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**BEFORE THE FEDERAL ELECTION COMMISSION****CAMPAIGN LEGAL CENTER****v.****MEI SERVICES, INC.****MUR: 8022****PATRIOTS PAC, LLC'S AND MEI SERVICES, INC.'S RESPONSE TO COMPLAINT**

COMES NOW, PATRIOTS PAC, LLC (the "PAC") and MEI SERVICES, INC. ("MEI"; collectively, the "Respondents"), by and through undersigned counsel, file this their joint response to the Complaint as follows:

1.

This matter arose because of various contributions made by MEI to the PAC (the "Contributions").

2.

A complaint was filed on July 5, 2022 (the "Complaint") with the Federal Election Commission (the "FEC") alleging that the Contributions violated the Federal Election Campaign Act of 1971, as amended ("FECA").

3.

The crux of the Complaint alleges that the Respondents violated FECA because the Contributions came from MEI, a federal contractor.

4.

After the filing of the Complaint, the PAC reviewed all the relevant materials and due to the lack of experience by the undersigned and the PAC treasurer, the PAC did identify that there are problems that needed to be addressed.

5.

Consequently, the PAC has since taken action to rectify the issues alleged in the Complaint.

6.

Specifically, the PAC promptly refunded all the Contributions to MEI after being notified of these issues.

7.

As a result of these issues, the PAC has since implemented better compliance procedures to avoid further complications.

7.

Moreover, as the PAC is in the process of winding down, it is unlikely that there will be further violations in the future.

8.

Accordingly, the Respondents asked that the FEC consider the cooperation and swift action taken by the Respondents in its ultimate decision.

Respectfully submitted this the 22nd day of August, 2022.

**KAN CLARK LLP**

/s/ Alan Kan  
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**FEDERAL ELECTION COMMISSION  
1050 First Street, NE  
Washington, DC 20463**

## **STATEMENT OF DESIGNATION OF COUNSEL**

Provide one form for each Respondent/Witness

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AR/MUR/RR/P-MUR# 8022

Name of Counsel: Alan Kan

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The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

11/16/22  
Date

Date \_\_\_\_\_

*Walt Johnson*  
(Signature - Respondent/Agent/Treasurer)

MELVIN JOHNSON

## VP of Operations

**Title**

**RESPONDENT:** MEI Services, Inc.  
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 2951 Piedmont Rd NE Suite B  
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This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.