



FEDERAL ELECTION COMMISSION

Washington, D.C. 20463

1

October 10, 2023

MEMORANDUM

5 **TO:** The Commission

6
7 **FROM:** Lisa J. Stevenson
8 Acting General Counsel
9

10 Charles Kitcher
11 Associate General Counsel for Enforcement
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13 **BY:** Mark Shonkwiler *MS*
14 Assistant General Counsel
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16 Kimberly D. Hart *KDH*
17 Attorney
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19 **SUBJECT:** MUR 8022 (MEI Services, Inc.)
20 Recommendation to Accept Signed Conciliation Agreement
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23 On February 9, 2023, the Commission found reason to believe that MEI Services, Inc.
24 violated 52 U.S.C. § 30119(a) and 11 C.F.R. § 115.2(a) by making prohibited federal contractor
25 contributions and authorized an investigation limited to a document request seeking records in
26 MEI Services, Inc.'s possession reflecting any refunds that it received from Patriots PAC, LLC
27 during the period relevant to the transactions at issue.¹ On July 13, 2023, the Commission
28 authorized the Office of General Counsel to engage in pre-probable cause conciliation with the
29 Committee.²
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¹ Certification ("Cert.") ¶ 2.a., 2.c. (Feb. 13, 2023).

² Cert. ¶ 1.a. (July 14, 2023).

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3 In addition, at the time the Commission found reason to believe as to MEI Services, Inc.,
4 it took no action as to the recipient committee, Patriots PAC, LLC and Melvin Johnson in his
5 official capacity as treasurer (“Committee”).⁵ The record in this matter contains no information
6 regarding any Committee solicitation of MEI. Further, the Committee, which has reported no
7 activity since its Amended October 2022 Quarterly Report reflecting the refunds to MEI, has
8 requested termination.⁶ Accordingly, we now recommend that the Commission dismiss the
9 allegation as to the Committee.

10 We recommend that the Commission accept the signed agreement and close the file in
11 this matter.

12 **RECOMMENDATIONS:**

13 1. Accept the attached conciliation agreement;
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15 2. Dismiss the allegation that Patriots PAC, LLC and Melvin Johnson in
16 his official capacity as treasurer violated 52 U.S.C. § 30119(a) and
17 11 C.F.R. § 115.2(c) by knowingly soliciting a federal contractor contribution;
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19 3. Approve the appropriate letters; and
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21 4. Close the file.

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4 Attach. 1.

5 Cert. ¶ 2.b. (Feb. 13, 2023).

6 Termination Report, Patriots PAC, LLC (Mar. 27, 2023); Amended 2022 October Quarterly Report,
Patriots PAC, LLC (June 21, 2023).