



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

May 12, 2025

Via Electronic Mail Only

samuel.brown@hklaw.com

Samuel C. Brown
Holland & Knight, LLP
800 17th Street N.W., Suite 100
Washington, D.C. 20006

RE: MUR 8363 (Calspan Corporation)

Dear Mr. Brown:

On April 9, 2025, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of violations of 52 U.S.C. §§ 30122, 30118(a), and 30119(a) and 11 C.F.R. §§ 110.4(b)(1)(i), 114.2(d), and 115.2(a), provisions of the Federal Election Campaign Act of 1971, as amended and Commission regulations. Accordingly, the file has been closed in this matter, effective today.

Documents related to the case will be placed on the public record today. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016). Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. *See* 52 U.S.C. § 30109(a)(4)(B).

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. Payment can be made online by debit, credit card, or automated clearing house (ACH) withdrawal, using this link to the government's secure portal for online collections: <https://www.pay.gov/public/form/start/316805379>. Payment can also be made by check or money order payable to the Federal Election Commission and sent via regular mail to the Federal Election Commission, 1050 First Street NE, Washington, DC 20463, or by courier or overnight delivery to the same address but with a different zip code (20002). Please write the matter number "MUR 8363 civil penalty" on the memo line of the check. If you have any questions, please contact me at (202) 694-1650.

Sincerely,

Kimberly D. Hart

Kimberly D. Hart
Attorney

Enclosure
Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Calspan Corporation)	MUR 8363
David Meier)	
Peter Sauer)	

CONCILIATION AGREEMENT

This matter was initiated by a *sua sponte* submission (“the Submission”) made to the Federal Election Commission (the “Commission”) by Calspan Corporation (“Calspan”), David Meier (“Meier”) and Peter Sauer (“Sauer”). *See* 52 U.S.C. § 30109(a)(1). The Commission found reason to believe that Calspan violated 52 U.S.C. §§ 30122, 30119(a), and 30118(a), and 11 C.F.R. §§ 110.4(b)(1)(i), 114.5(a) and 114.2(e), provisions of the Federal Election Campaign Act (the “Act”) and Commission regulations, by making prohibited contributions in the names of others while holding active government contracts. In addition, the Commission found reason to believe that Peter Sauer, former Chief Executive Officer of Calspan, violated 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b)(1)(ii) by knowingly permitting his name to be used to make contributions in the name of another; and violated 52 U.S.C. § 30118(a) and 11 C.F.R. § 114.2(e) by consenting to the making of prohibited corporate contribution. Further, the Commission found reason to believe that David Meier, former Vice-President of Calspan Aero Systems Engineering (“Calspan ASE”), violated 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b)(1)(ii) by knowingly permitting his name to be used to make contributions in the name of another; and violated 52 U.S.C. § 30118(a) and 11 C.F.R. § 114.2(e) by consenting to the making of prohibited corporate contributions.

NOW, THEREFORE, the Commission and Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 52 U.S.C. § 30109(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts and law in this matter are as follows:

1. Calspan, headquartered in Buffalo, New York, provides engineered testing and technology development services and systems for the aerospace and defense industries.

Between 2019 and 2023, Calspan held multiple active government contracts.

2. Peter Sauer served as the CEO of Calspan until August 18, 2023, when he left the company.

3. In 2020, Calspan acquired Aero Systems Engineering ("ASE"), a company headquartered in St. Paul, Minnesota that became known as Calspan ASE.

4. David Meier was the President of Calspan ASE at the time of this acquisition and remained in the same position until mid-2024 when he left the company.

5. Michael D. Blakeslee, Kristal Gillespie, David J. Myren, Allen T. Rivers and Gregory Swanson were executives of Calspan ASE recruited by Meier to act as conduits for federal contributions. Meier, relying on assurances from Sauer, encouraged the conduits to contribute and seek reimbursement from Calspan.

6. Between September 2019 and February 2023, seven Calspan executives, Michael Blakeslee, Kristal Gillespie, David Meier, David Myren, Allen Rivers, Peter D. Sauer, and Gregory Swanson, made the following federal contributions, totaling \$14,900, to various federal committees:

Date	Contributor	Recipient Committee	Amount
09/22/2019	Peter Sauer	Jacobs for Congress	\$500
03/30/2022	David Meier	McCollum for Congress	\$1,000
06/03/2022	David Meier	McCollum for Congress	\$1,900
06/03/2022	Peter Sauer	McCollum for Congress	\$2,900
06/03/2022	Michael Blakeslee	McCollum for Congress	\$1,000
06/03/2022	Kristal Gillespie	McCollum for Congress	\$1,100
06/03/2022	David Myren	McCollum for Congress	\$1,000
06/03/2022	Allen Rivers	McCollum for Congress	\$1,000
06/03/2022	Gregory Swanson	McCollum for Congress	\$1,100
08/26/2022	David Meier	McCollum for Congress	\$900
10/11/2022	David Meier	McCollum for Congress	\$500
02/13/2023	David Meier	Wicker for Senate	\$500
02/13/2023	Peter Sauer	Wicker for Senate	\$1,000
TOTAL CONTRIBUTION AMOUNT			\$14,900

7. During the same time, Sauer approved the reimbursement of the contributions from Calspan funds to the conduits in the form of “grossed up” non-salary compensation.

8. Under Section 30122 of the Act, no person shall make a contribution in the name of another. 52 U.S.C. § 30122; *see also* 11 C.F.R. § 110.4(b)(1)(i). The term “person” for purposes of the Act and Commission regulations includes partnerships, corporations, and other organizations, including LLCs. *See* 52 U.S.C. § 30101(11); 11 C.F.R. § 100.10; Advisory Op. 2009-02 at 3 (True Patriot Network). A person also may not knowingly permit one’s name to be used to effect the making of a contribution in the name of another. 11 C.F.R. § 110.4(b)(1)(ii).

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9. The Act and Commission regulations prohibit a corporation from making a contribution to a federal committee (other than an independent-expenditure-only committee). 52 U.S.C. § 30118(a); 11 C.F.R. § 114.2(d). Further, the Act prohibits an officer or director of a corporation from consenting to the making of a corporate contribution. *Id.* § 30118(a); *Id.* § 114.2(e).

10. The Act and the Commission's regulations prohibit contributions to political committees by any person who enters into a contract with the United States or its departments or agencies for "furnishing any material, supplies, or equipment," if payment on such contract "is to be made in whole or in part from funds appropriated by Congress." 52 U.S.C. § 30119(a)(1); 11 C.F.R. § 115.2(a). Such contributions are barred for the period between (1) the earlier of commencement of negotiations or when requests for proposal are sent out, and (2) the later of the completion of performance on or termination of negotiations for the contract. 11 C.F.R. § 115.1(b). The prohibition covers contributions to any political party, political committee, federal candidate, or "any person for any political purpose or use." *Id.* § 115.2(a). The Act also bars any person from knowingly soliciting a contribution from a federal contractor during the prohibited period. 52 U.S.C. § 30119(a)(2); 11 C.F.R. § 115.2(c).

11. A principal is liable vicariously for the acts of its agent committed within the scope of agency. RESTATEMENT (THIRD) OF AGENCY § 7.07.

V. Respondent Calspan Corporation violated 52 U.S.C. §§ 30122, 30119(a), and 30118(a), and 11 C.F.R. § 110.4(b)(1)(i), 115.2(a), and 114.2(d) by making prohibited contributions in the names of others while holding active federal contributions.

VI. Respondent Peter Sauer violated 52 U.S.C. §§ 30122 and 30118(a) and 11 C.F.R. §§ 110.4(b)(1)(ii) and 114.2(e) by consenting to the making of a prohibited contribution in the names of others.

VII. Respondent David Meier violated 52 U.S.C. §§ 30122 and 30118(a) and 11 C.F.R. §§ 110.4(b)(1)(ii) and 114.2(e).

VIII. Respondents will take the following actions:

1. Respondent Calspan Corporation will cease and desist from violations of 52 U.S.C. §§ 30122, 30119(a), and 30118(a) and 11 C.F.R. § 110.4(b)(1)(i), 115.2(a), 114.2(d).
2. Respondent Peter Sauer will cease and desist from violations of 52 U.S.C. § 30122 and 30118(a) and 11 C.F.R. §§ 110.4(b)(1)(iii) and 114.2(e).
3. Respondent David Meier will cease and desist from violations of 52 U.S.C. §§ 30122 and 30118(a) and 11 C.F.R. §§ 110.4(b)(1)(iii) and 114.2(e).
4. Respondents will pay a joint civil penalty of Twenty-Five Thousand Dollars (\$25,000), pursuant to 52 U.S.C. § 30109(a)(5)(A).
5. Respondent Calspan Corporation will notify each of the recipient political committees that the contributions made in the names of Michael Blakeslee, Kristal Gillespie, David Meier, David Myren, Allen Rivers, Peter Sauer, and Gregory Swanson were illegal contributions made in the name of another, and that Calspan Corporation is waiving its right to a refund from the recipient committees.

IX. The Commission, on request of anyone filing a complaint under 52 U.S.C. § 30109(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any

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requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

X. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

XI. Except as otherwise provided, Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XII. This conciliation agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained within this written agreement shall be enforceable.

