



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.


March 13, 2024


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3 **MEMORANDUM**  
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5 **TO:** The Commission  
6

7 **FROM:** Lisa J. Stevenson  
8 Acting General Counsel  
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10 Charles Kitcher  
11 Associate General Counsel for Enforcement  
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13 **BY:** Claudio J. Pavia   
14 Deputy Associate General Counsel for Enforcement  
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16 Jacob Tully   
17 Attorney  
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19 **SUBJECT:** MUR 7833 (Montcalm LLC, *et al.*)  
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22 On February 27, 2024, the Commission voted to find no reason to believe that Montcalm  
23 LLC violated 52 U.S.C. §§ 30102, 30103, or 30104 by failing to register and report as a political  
24 committee and voted to approve the relevant portions of the Factual and Legal Analyses. The  
25 Commission also dismissed the allegation that Congressional Leadership Fund and Caleb Crosby  
26 in his official capacity as treasurer violated 52 U.S.C. § 30122 by knowingly accepting  
27 contributions made in the name of another. Finally, the Commission was unable to secure  
28 sufficient votes to find reason to believe that Hendrik G. Meijer and Montcalm LLC violated  
29 52 U.S.C. § 30122 by making or knowingly permitting one's name to be used to effect a  
30 contribution in the name of another. As a result, the Commission voted to close the file in this  
31 matter.  
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33 Because the "relevant portions" of the Factual and Legal Analysis for Montcalm LLC  
34 (those concerning the Complaint's political committee registration and reporting allegations)  
35 were premised on findings concerning 52 U.S.C. § 30122, *i.e.*, that Meijer made the contribution  
36 at issue and Montcalm LLC merely acted as a conduit and did not itself make any contribution,  
37 the Office of General Counsel was required to make substantive edits and adjustments to the  
38 Factual & Legal Analysis to create a cogent standalone argument supporting those approved

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1 portions, requiring further Commission approval. Because the file is closed, in order to approve  
2 the edited Factual and Legal Analysis as to Montcalm LLC, we recommend that the Commission  
3 reopen the MUR 7833 file, approve the Factual and Legal Analysis, and then close the file.  
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5 **RECOMMENDATIONS**  
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- 7 1. Reopen MUR 7833;  
8 2. Approve the attached Factual and Legal Analysis;  
9 3. Close the file effective 30 days from the date of certification of this vote (or on the  
10 next business day after the 30th day, if the 30th day falls on a weekend or holiday);  
11 and  
12 4. Send the appropriate letters.  
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