

Holtzman Vogel

HOLTZMAN VOGEL BARAN TORCHINSKY & JOSEFIAK PLLC

December 29, 2023

VIA EMAIL

Wanda D. Brown
Assistant General Counsel
Office of Complaints Examination
& Legal Administration
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

Re: MUR 8111

Dear Ms. Brown:

This response is submitted by the undersigned counsel on behalf of Pacem Solutions International LLC; Pacem Defense LLC; Pacem Estate Holdings LLC; 1198 Windrock LLC; and ALS, Inc. (the “PACEM Respondents”), in response to your letter dated December 19, 2023, with respect to additional information filed by the Complainant in MUR 8111 (the “Supplemental Notification Letter”).

As we initially expressed in our response to your February 22, 2023 Notification Letter, the Complainant has utterly failed to articulate any coherent allegation of a campaign finance violation by any PACEM Respondent. Nothing in the additional information referenced in your Supplemental Notification Letter changes that assessment. Rather, the 189 pages of supplemental information appear to be nothing more than the same recycled and unsupported claims against Congressman Cory Mills contained in the initial complaint with only tangential and erroneous references to any of the PACEM Respondents.¹

In light of the Complainants lack of any credible allegations—or seemingly any allegation at all—against the PACEM Respondents, this appears to be nothing more than an effort by Complainant to harass our clients using the Federal Election Commission complaint process.²

¹ It is also troubling that the Amended Complaint appears to purport to add additional named Respondents, including PACEM executives Andrew Knaggs, Tarun Handa, and Joseph Schmitz. However, the Amended Complaint does not make any allegations regarding these named respondents except to note that they are listed on public records filed by PACEM Respondents.

² Additionally, it appears the Complainant inadvertently attached two complaints filed with other governmental agencies against Congressman Mills and others in the supplemental information he submitted (*see* Am. Compl. at pages 60-126 and 127-189). This is further evidence of the Complainants harassing behavior.

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Accordingly, we request that the Commission expeditiously find that there is no allegation against the PACEM Respondents and dismiss the Complaint against our clients.

Sincerely,

A handwritten signature in black ink, appearing to be 'Jason B. Torchinsky', written in a cursive style.

Jason B. Torchinsky
Michael Bayes
Andrew D. Watkins
Counsel to PACEM Respondents