



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Russell Turner, CEO  
Turner Strategic Technologies, LLC  
7440 Central Business Park Drive, Suite 100  
Norfolk, VA 23513

**JUL 10 2018**

RE: MURs 7078 and 7084

Dear Mr. Turner:

On June 15, 2016, the Federal Election Commission (the "Commission") notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. On June 28, 2018, the Commission found that there is no reason to believe that Turner Strategic Technologies, LLC, violated 52 U.S.C. § 30119(a)(1). Accordingly, the Commission closed its file in this matter.

Documents related to the case will be placed on the public record within 30 days. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016). The Factual and Legal Analysis, which explains the Commission's finding, is enclosed for your information.

If you have any questions, please contact me at (202) 694-1650.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Shonkwiler", with a long horizontal line extending to the right.

Mark Shonkwiler  
Assistant General Counsel

Enclosure  
Factual and Legal Analysis

**FEDERAL ELECTION COMMISSION**

**FACTUAL AND LEGAL ANALYSIS**

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3 **RESPONDENTS:** Stephen Baggs MUR: 7084  
4 Systems Technology Forum, Ltd.  
5 Thomas Bates  
6 RK Chevrolet, Buick, Subaru, Inc.  
7 Darek Dabbs  
8 Sera-Brynn LLC  
9 Eric Kimble  
10 Kimble Companies/Penn-Ohio Coal Co.  
11 Ronald Kramer  
12 Kramer Management Enterprises, Inc.  
13 Shawn Kuhle  
14 Turner Strategic Technologies  
15 Tactical Defense Solutions LLC  
16 William W. Lee, Jr.  
17 National Research Group, LLC  
18 Bob Miller  
19 Miller-Stephenson & Associates, P.C.  
20 David H. Mutzabaugh  
21 ThunderCat Technology, LLC  
22 Richard D. Roberts  
23 Norfolk Southern Corporation  
24 Eric Sisco  
25 Virginia International Gateway, Inc.  
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27 **I. INTRODUCTION**  
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29 This matter was generated by a Complaint filed with the Federal Election Commission by  
30 Lisa Clarkson. The Complaint alleges multiple federal contractors violated the Federal Election  
31 Campaign Act of 1971, as amended (the "Act") and Commission regulations, by contributing to  
32 Scott Taylor for Congress (the "Committee"). For the reasons set forth below, the Commission  
33 finds no reason to believe that the alleged federal contractors violated the Act or regulations.

1    **II.    FACTUAL AND LEGAL ANALYSIS**

2            Scott Taylor was a Member of the Virginia House of Delegates, and ran for Congress in  
3    Virginia's Second District in 2010 and 2016.<sup>1</sup> The Complaint alleges multiple federal  
4    contractors contributed to Taylor's congressional committee.<sup>2</sup>

5            Federal contractors may not make contributions to political committees, and a Committee  
6    may not knowingly solicit donations from federal contractors.<sup>3</sup> This prohibition does not apply  
7    to individual employees of a federal contractor who are not themselves contractors.<sup>4</sup> Employees  
8    of federal contractors may contribute to federal political committees using personal funds.<sup>5</sup>

9            The Committee alleges that the contributors identified by the Complaint are employees of  
10   federal contractors, not contractors themselves, and may contribute. Nearly all of the named  
11   contributors submitted responses affirming that they are not contractors, and that the funds used  
12   were personal and not directed by a contractor firm. One contributor did not respond, but the  
13   Commission has no information indicating that he is a federal contractor. The Commission  
14   therefore finds no reason to believe that the individuals named in the Complaint are federal  
15   contractors, and no reason to believe that they violated 52 U.S.C. § 30119(a)(1).

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<sup>1</sup> Taylor lost the Republican Primary in 2010, and won election to Congress in 2016.

<sup>2</sup> Compl. at II (June 14, 2016).

<sup>3</sup> 52 U.S.C. § 30119(a)(1)-(2); 11 C.F.R. § 115.2.

<sup>4</sup> 11 C.F.R. § 115.6.

<sup>5</sup> *Id.* Additionally, if a sole proprietorship is a federal contractor, the owner of that entity may not donate to federal campaigns using business, personal or other funds. *Id.* § 115.5.