



FEDERAL ELECTION COMMISSION

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Charles Kitcher
Acting Associate General Counsel for Enforcement

Stephen Gura
Deputy Associate General Counsel for Enforcement

DATE: January 29, 2021

BY: Mark Shonkwiler *MS*
Assistant General Counsel

Kimberly D. Hart *KH/ms*
Attorney

SUBJECT: MUR 7102 (Keefe, Keefe & Unsell, P.C) Probable Cause Conciliation

On January 12, 2021, the Commission found probable cause to believe that Keefe, Keefe & Unsell, P.C. (the "Firm"), violated 52 U.S.C. §§ 30122 and 30118(a), and 11 C.F.R. §§ 110.4(b)(1)(i), 114.2(b) and (f) by making \$18,900 in prohibited corporate contributions in the names of others, and by using corporate resources to facilitate such prohibited contributions. The Commission authorized the Office of the General Counsel to engage in probable cause conciliation with the Firm.

. We recommend that the Commission accept the signed agreement, take no further action as to the individual partners who were the subject of reason to believe findings, and close the file in this matter.

MUR 7102 (Keefe, Keefe & Unsell, P.C.)

Memorandum to the Commission

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16 We believe this negotiated settlement represents an acceptable resolution of the matter.
17 We therefore recommend that the Commission accept the signed conciliation agreement with the
18 Firm. We also recommend that the Commission take no further action as to the three individual
19 partners in the Firm that previously were the subject of reason to believe findings: Thomas Q.
20 Keefe, Jr., Thomas Q. Keefe III, and Samantha Unsell. Finally, we recommend that the
21 Commission close the file.
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24 **RECOMMENDATIONS:**

- 25 1. Accept the attached conciliation agreement.
26 2. Take no further action as to Thomas Q. Keefe, Jr., Thomas Q Keefe III, and
27 Samantha Unsell.
28 3. Approve the appropriate letters.
29 4. Close the file.
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