



FEDERAL ELECTION COMMISSION
Washington, DC 20463

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Montcalm LLC, *et al.*) MUR 7833
)

STATEMENT OF REASONS OF COMMISSIONERS ALLEN J. DICKERSON, DARA LINDENBAUM AND JAMES E. “TREY” TRAINOR, III

The Complaint in this matter alleged that unknown individuals made a contribution in the name of Montcalm LLC to Congressional Leadership Fund (“CLF”) in violation of 52 U.S.C. § 30122.¹ Ten days after its formation, on October 8, 2020, Montcalm made a \$150,000 contribution to CLF, which CLF disclosed in a report filed with the Commission on October 22, 2020.² The next day, on October 23, 2020, the Complaint was filed and, in response to the Complaint, CLF amended its disclosure report the same day to attribute the contribution to Montcalm’s single member, Hendrik “Hank” Meijer.³ The Office of General Counsel (“OGC”) recommended that the Commission find reason to believe that Meijer made, and Montcalm knowingly permitted its name to be used to make, a contribution in the name of another.⁴ OGC further recommended that the Commission find reason to believe that CLF knowingly accepted a contribution in the name of another.⁵ However, given that CLF corrected the public record one day after the report was filed and 15 days after receipt of the contribution, we did not believe that this matter warranted further devotion of scarce enforcement resources. Therefore, we voted to dismiss the allegations as an exercise of prosecutorial discretion.⁶

5/1/24
Date


Allen J. Dickerson
Commissioner

¹ Compl. ¶¶ 1-2 (Oct. 23, 2020). This Statement addresses only the Section 30122 allegations. The Commission issued Factual and Legal Analyses addressing the other allegations and Respondents in this matter. Certification ¶ 2c (Feb. 27, 2024).

² Compl. ¶ 5; CLF, 2020 12-Day Pre-General Report at 192 (Oct. 22, 2020).

³ CLF, Amended 2020 12-Day Pre-General Report at 193 (Oct. 23, 2020); CLF Resp. at 1 (Dec. 15, 2020); Montcalm LLC Resp. at 2 (Dec. 15, 2020).

⁴ First Gen. Counsel’s Rpt. at 25 (Dec. 22, 2023).

⁵ *Id.*

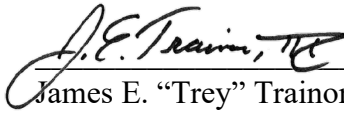
⁶ Certification ¶¶ 1, 3a, 4 (Feb. 27, 2024); *Heckler v. Chaney*, 470 U.S. 821 (1985).

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5/1/24
Date


Dara Lindenbaum
Commissioner

5/1/24
Date


James E. "Trey" Trainor, III
Commissioner