BEFORE THE FEDERAL ELECTION COMMISSION

CAMPAIGN LEGAL CENTER
1101 14th Street, NW, Suite 400
Washington, DC 20005
(202) 736-2200

v. MUR No. _______

MMR CONSTRUCTORS, INC.
15961 Airline Highway
Baton Rouge, LA 70817

COMPLAINT

1. While performing on a federal government contract, MMR Constructors, Inc. ("MMRC") made an illegal $100,000 political contribution to Hope in Action PAC ("Hope PAC"), a super PAC supporting Rep. Julia Letlow, who currently represents Louisiana's 5th congressional district—where MMRC is based—and is the Republican 2026 general election candidate for the U.S. Senate in Louisiana. By making this $100,000 contribution, MMRC violated federal campaign finance laws that expressly prohibit federal contractors from making political contributions—a prohibition that has for decades served as a crucial bulwark against "pay-to-play" arrangements and the appearance of such arrangements. Indeed, MMRC's actions illustrate why such contributions are prohibited: a federal contractor financially backing the Senate candidacy of their congressional representative in a transparent bid to secure access, influence, and future federal contracts presents the quintessential example of pay-to-play corruption, which fundamentally undermines voters' faith in the democratic process.

2. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that MMRC violated the Federal Election Campaign Act ("FECA") by contributing $100,000 to Hope PAC while performing on a federal contract.[1]

FACTS

3. Hope PAC is an independent-expenditure only political committee ("IEOPC"), commonly known as a "super PAC," which registered with the Federal Election Commission (the "FEC" or "Commission") on December 13, 2022. Its treasurer is Jodee Bruyninckx.[2]

4. During the 2026 election cycle, Hope PAC has made $74,130 in independent expenditures supporting Letlow.[3] Hope PAC also contributed $2,863,500 to Accountability Project, Inc.,[4] a super PAC that has exclusively backed Letlow during the 2026 election cycle, making $9,522,193 in independent expenditures supporting her Senate candidacy.[5]

5. Hope PAC reported receiving a $100,000 contribution from MMRC on March 31, 2026.[6] In connection with its contribution, MMRC disclosed an address of "15961 Airline Highway, Baton Rouge, Louisiana 70817."[7]

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[1] 52 U.S.C. § 30109(a)(1).

[2] Hope in Action PAC, Statement of Org. at 1 (Dec. 13, 2022), https://docquery.fec.gov/pdf/135/202212139557563135/202212139557563135.pdf. Hope PAC originally registered as a hybrid PAC—*i.e.*, a committee that maintains both a contribution and non-contribution account—but it later asserted that it "has been a SuperPAC from December 2022" and that its original statement of organization "checked the incorrect box." Hope in Action PAC, Miscellaneous Electronic Submission to the FEC (FEC Form 99) (Jun. 15, 2026), https://docquery.fec.gov/pdf/693/202606159870663693/202606159870663693.pdf; *see* Hope in Action PAC, Amend. Statement of Org. at 1 (Jun. 15, 2026), https://docquery.fec.gov/pdf/606/202606159870663606/202606159870663606.pdf.

[3] Hope in Action PAC, 24/48-Hour Report of Independent Expenditures (Apr. 2, 2026), https://docquery.fec.gov/cgi-bin/fecimg/?202604029856934868.

[4] Hope in Action PAC, Disbursements to "Accountability Project," 2025–2026, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00829952&recipient_name=Accountability+Project&two_year_transaction_period=2026 (last visited Aug. 20, 2026).

[5] Independent Expenditures, 2025-2026, Accountability Project, Inc., https://www.fec.gov/data/independent-expenditures/?two_year_transaction_period=2026&data_type=processed&q_spender=C00940957&cycle=2026 (last visited Aug. 18, 2026).

[6] Hope in Action PAC, 2026 Apr. Quarterly Report at 19 (Apr. 15, 2026), https://docquery.fec.gov/cgi-bin/fecimg/?202604159862413687.

[7] *Id.*

6. According to its website, MMR Group, MMRC's parent company, is a "world leader in electrical, instrumentation, construction, maintenance, management and technical services."[8] MMR Group also previously contributed $50,000 to Hope PAC on October 19, 2023.[9]

7. According to USASpending.gov, "the official open data source of federal spending information, including information about federal awards such as contracts, grants, and loans,"[10] MMRC was awarded a federal contract with the National Aeronautics and Space Administration (NASA) to provide services relating to "HPIW" or "High Pressure Industrial Water" between December 15, 2025, and April 17, 2026—a period covering MMRC's March 31, 2026, contribution to Hope PAC.[11] The address on MMRC's USASpending.gov profile matches the one that it provided in connection with its contribution to Hope PAC, and MMR Group's website indicates that MMRC is located at that address.[12]

8. Letlow has represented Louisiana's 5th congressional district since 2021.[13] The district encompasses parts of Baton Rouge, Louisiana, including the address where MMRC is located.[14]

9. Letlow and John Fleming defeated incumbent Sen. Bill Cassidy in Louisiana's May 16, 2026, Republican primary election, and Letlow then defeated Fleming in a June 27, 2026,

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[8] MMR Group, *Services*, https://mmrgrp.com/services (last visited Aug. 18, 2026).

[9] Hope in Action PAC, Amend. 2023 Year-End Report at 6 (Jul. 15, 2024), https://docquery.fec.gov/cgi-bin/fecimg/?202407159659933145.

[10] USASpending.gov, *Mission*, https://www.usaspending.gov/#/about (last visited Aug. 18, 2026).

[11] USASpending.gov, Purchase Order Contract to MMR Constructors, Inc., https://www.usaspending.gov/award/CONT_AWD_80NSSC26P0076_8000_-NONE-_-NONE- (last visited Aug. 18, 2026).

[12] USAspending.gov, *Recipient Profile*, MMR Constructors, Inc., https://www.usaspending.gov/recipient/63dce590-dfb9-b020-c5fc-9e5d5101b82d-C (last visited Aug. 18, 2026); *see* MMR Group – Locations, https://mmrgrp.com/locations (last visited Aug. 18, 2026) (indicating that the MMR Group's Baton Rouge, LA, location "includes the following subsidiaries: MMR Constructors, Inc.").

[13] Representative Julia Letlow, Congress.gov, https://www.congress.gov/member/julia-letlow/L000595 (last visited Aug. 18, 2026).

[14] *See supra* note 11 (indicating that MMRC is in "Congressional District: LA-05").

primary runoff.[15] As such, Letlow is the Republican candidate for the U.S. Senate in Louisiana in the November 2026 general election.

Summary of the Law

10. Under FECA, if the Commission receives a complaint and determines that there is "reason to believe that a person has committed . . . a violation" of the Act, the Commission "shall make an investigation of such alleged violation."[16] The reason-to-believe finding is a threshold determination and "does not establish that the law has been violated."[17] The Commission uses the ensuing investigation "to determine whether a violation in fact occurred and, if so, its exact scope."[18] Accordingly, the Commission will find reason to believe when the "available evidence" is "sufficient to warrant conducting an investigation, and where the seriousness of the alleged violation warrants" further action.[19]

11. Under FECA, a "contribution" is defined as "any gift . . . of money or anything of value made by any person for the purpose of influencing any election for Federal office."[20]

12. FECA prohibits a federal contractor from making any "contribution to any political party, committee, or candidate for public office" at any time between the commencement of negotiations for a federal contract and the completion of performance or termination of

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[15] *United States Senate Election in Louisiana, 2026*, Ballotpedia, https://ballotpedia.org/United_States_Senate_election_in_Louisiana,_2026 (last visited Aug. 18, 2026).

[16] 52 U.S.C. § 30109(a)(2); *see* 11 C.F.R. § 111.10(a).

[17] Statement of Policy Regarding Commission Action in Matters at the Initial Stage in the Enforcement Process, 89 Fed. Reg. 19,729, 19,730 (Mar. 20, 2024), https://www.fec.gov/resources/cms-content/documents/fedreg_notice_2024-08.pdf.

[18] *Id.*

[19] *Id.*

[20] 52 U.S.C. § 30101(8)(A)(i).

negotiations for the contract.[21] FECA additionally prohibits any person from knowingly soliciting such a contribution from a federal contractor.[22]

13. The contractor contribution ban applies to any "person"—defined to include "an individual, partnership, committee, association, corporation, labor organization, or any other organization or group of persons"[23]—who "enters into any contract with the United States or any department or agency thereof" for "the rendition of personal services" or for "furnishing any material, supplies, or equipment," or for "selling any land or building," if "payment for the performance of such contract or payment for such material, supplies, equipment, land, or building is to be made in whole or in part from funds appropriated by the Congress."[24] In MUR 8021, the Commission emphasized that "the plain language of section 30119 covers 'any contract with the United States or any department or agency thereof.'"[25]

14. The contractor contribution ban applies from when a request for proposals is sent out (or when contractual negotiations commence, whichever is earlier) until the completion of performance of the contract or the termination of negotiations.[26]

15. The Commission made clear over fifteen years ago that the federal contractor contribution ban applies to super PACs. In MUR 6403, the Commission emphasized that a contractor making a contribution to a political committee to fund independent expenditures is not itself

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21 *Id.* § 30119(a)(1).
22 *Id.* § 30119(a)(2).
23 *Id.* § 30101(11).
24 *Id.* § 30119(a)(1); 11 C.F.R. § 115.1(a).
25 Factual and Legal Analysis at 8, MUR 8021 (Ohio Ordnance Works) (May 1, 2023), https://www.fec.gov/files/legal/murs/8021/8021_11.pdf.
26 52 U.S.C. § 30119(a)(1); 11 C.F.R. § 115.1(b).

making an expenditure; therefore, a contribution to such a committee falls "squarely within the statute's prohibitions."[27]

16. Moreover, in 2017, the Commission noted that there is no de minimis exception to the federal contractor contribution, finding that even if a contributor's federal contract work is only a "small fraction" of its overall business, this "does not negate the company's status as a federal contractor."[28]

17. Even when the prohibited contractor contribution has been refunded, the Commission has pursued enforcement action. In 2019, the Commission found reason to believe federal contractor Ring Power Corporation violated Section 30119 when it contributed $50,000 to an IEOPC, finding that Ring Power's remedial measures, including obtaining a refund of the illegal contribution from the IEOPC, "do not excuse the violation."[29]

18. The federal contractor ban applies in circumstances where there is "a very specific quo for which the contribution may serve as the quid," and it was upheld unanimously by the en banc U.S. Court of Appeals for the D.C. Circuit in *Wagner v. FEC*, where the court stated that "the record offers every reason to believe that, if the dam barring contributions were broken, more money in exchange for contracts would flow through the same channels already on display."[30]

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[27] Factual and Legal Analysis at 5, 9, MUR 6403 (Alaskans Standing Together) (Nov. 10, 2011), https://www.fec.gov/files/legal/murs/6403/11044304929.pdf.

[28] Factual and Legal Analysis at 4–5, MUR 7099 (Suffolk Construction Co., Inc.) (May 31, 2017), https://www.fec.gov/files/legal/murs/7099/17044430509.pdf (finding reason to believe that federal contractor Suffolk Construction Company, Inc. violated 52 U.S.C. § 30119(a)(1) by contributing $200,000 to an IEOPC).

[29] Factual and Legal Analysis at 4, MUR 7451 (Ring Power Corp.) (May 21, 2019), https://www.fec.gov/files/legal/murs/7451/19044471622.pdf; *see* Factual and Legal Analysis at 2–3, MUR 7568 (Alpha Marine Servs., Inc.) (Aug. 22, 2019), https://www.fec.gov/files/legal/murs/7568/7568_12.pdf (same).

[30] *Wagner v. FEC*, 793 F.3d 1, 18, 22 (D.C. Cir. 2015) (en banc).

CAUSE OF ACTION

I. MMR CONSTRUCTORS, INC. VIOLATED THE FEDERAL CONTRACTOR CONTRIBUTION BAN, 52 U.S.C. § 30119

19. FECA and Commission regulations prohibit a federal contractor from making a contribution to any political committee during the period in which it is negotiating or performing on a federal contract.[31]

20. According to USAspending.gov, MMRC was a federal government contractor when it made a $100,000 contribution to Hope PAC on March 31, 2026.[32] Specifically, on March 31, 2026, when it made the contribution at issue, MMRC had an active contract—that ran from December 15, 2025, through April 17, 2026—to "furnish[] any material, supplies, or equipment to the United States or any department or agency thereof," in particular, NASA.[33]

21. By contributing $100,000 while holding an active federal contract, MMRC's conduct illustrates how the federal contractor contribution ban works to prevent actual or perceived pay-to-play corruption. MMRC is based in Letlow's congressional district and thus in the state (Louisiana) that Letlow would represent in the U.S. Senate if she were to prevail in the November 2026 general election.[34] The recipient of MMRC's contribution, Hope PAC, has spent close to $3 million supporting Letlow's Senate campaign—by directly making independent expenditures, and contributing to another super PAC that has made independent expenditures, supporting Letlow's candidacy.[35] As such, there is ample basis to conclude that

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31 52 U.S.C. § 30119(a)(1); 11 C.F.R. Part 115.

32 *See supra* notes 11–12 and accompanying text.

33 52 U.S.C. § 30119(a)(1).

34 *See supra* notes 13–15 and accompanying text.

35 *See supra* notes 3–7 and accompanying text.

MMRC's contribution to help elect Letlow to the Senate "may serve as the quid" for "a very specific quo"—Letlow's support for MMRC's federal contract work.[36]

22. Accordingly, there is reason to believe that MMRC, a federal contractor, violated FECA's federal contractor contribution ban at 52 U.S.C. § 30119(a) by making a $100,000 contribution during the period it was performing on a federal contract.

PRAYER FOR RELIEF

23. Wherefore, the Commission should find reason to believe that MMRC violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).

24. The Commission should seek appropriate sanctions for any and all violations, including civil penalties sufficient to deter future violations and an injunction prohibiting the respondents from any and all violations in the future, and should seek such additional remedies as are necessary and appropriate to ensure compliance with FECA.

Respectfully submitted,

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August 26, 2026

[36] *Wagner*, *supra* note 30.

VERIFICATION

The complainant listed below hereby verifies that the statements made in the attached Complaint are, upon their information and belief, true.

Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Campaign Legal Center

Saurav Ghosh

Saurav Ghosh, Esq.

Sworn to and subscribed before me this 26 day of August 2026.

Notary Public

David Amezola Barrera
NOTARY PUBLIC
STATE OF NEVADA
Appt. No. 25-0942-01
Expires February 12, 2029

Notarized remotely using audio-video communication technology via Proof.