

# WINSTON & STRAWN

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OFFICE OF THE  
GENERAL COUNSEL

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**VIA OVERNIGHT MAIL**

Mr. Leonard Evans  
Attorney, Enforcement Division  
Office of the General Counsel  
Federal Election Commission  
999 East Street N.W.  
Washington, D.C. 20463

**Re: MUR 6766**

Dear Mr. Evans:

This letter is on behalf of Sandi Jackson and is in response to Commissioner Ellen L. Weintraub's letter of December 12, 2013 regarding MUR 6766. Commissioner Weintraub's letter stated that on December 3, 2013 the Federal Election Commissions ("Commission") found reason to believe that Mrs. Jackson violated 2 U.S.C. § 439a and Commission regulations by diverting campaign committee funds for personal uses.

Pursuant to a plea agreement with the United States Attorney for the District of Columbia, Mrs. Jackson pleaded guilty and was convicted of a criminal offense covering the conduct described in Ms. Weintraub's letter and in the Commission's Factual and Legal Analysis. On August 14, 2013, Mrs. Jackson was sentenced to twelve months incarceration by Judge Amy Berman Jackson of the United States District Court for the District of Columbia.

Judge Berman Jackson also ordered Mrs. Jackson to pay to the United States Treasury \$22,000 in restitution. Her and her husband, Jesse Jackson Jr., made a substantial payment on October 25, 2013 and have entered into an agreement with the United States Attorney's Office whereby the remainder of the money judgment against both of them (over \$750,000) will be satisfied by June 1, 2014.

Mrs. Jackson has been sufficiently punished for her violations of the law by criminal proceedings that resulted in a substantial term of imprisonment and a large money judgment. The continuation of any civil proceedings against her can serve no legitimate purpose. Therefore, we respectfully request that the Commission decline to pursue this matter further against Mrs. Jackson.

Very truly yours,



Thomas L. Kirsch

TLK/slb

Delacy - I am following up on my voicemail left for you Monday morning. I understand that you represent Ms. Pasley, and I would be interested in talking or meeting with you once you have formally entered your appearance. I have attached the designation of counsel form I referenced in my message. To speed things along, you may email me a PDF of the completed form with the original sent by U.S. Mail. My contact information is below.  
Regards - Le Evans

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