



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

VIA ELECTRONIC AND CERTIFIED MAIL

SEP 21 2017

Charles R. Spies, Esq.
Elizabeth B. White, Esq.
Clark Hill
1001 Pennsylvania Avenue, NW, Suite 1300
Washington, DC 20004
cspies@clarkhill.com

RE: MUR 6920

Dear Mr. Spies and Ms. Beacham:

On September 20, 2017, the Federal Election Commission found that there is probable cause to believe your client, American Conservative Union, violated 52 U.S.C. § 30122, a provision of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 110.4(b)(1)(ii), by knowingly permitting its name to be used to effect a contribution in the name of another.

The Commission has a duty to attempt to correct such violations for a period of at least 30 days and no more than 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement after 30 days, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty. Due to the upcoming statute of limitations in this matter, we will not be able to engage in more than 30 days of tolling unless ACU agrees to toll the statute of limitations.

We have sent to you, under separate cover, the probable cause conciliation offer approved by the Commission.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting to discuss the Commission's settlement offer, please contact me at (202) 694-1634 or afuoto@sec.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "AFuoto".

Antoinette Fuoto
Attorney