



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson
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Charles Kitcher
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Stephen Gura
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SUBJECT: MUR 7048 (Cruz for President, *et al.*)
Pre-Probable Cause Conciliation Agreement
Close the File

I. Introduction

On April 9, 2019, the Commission found reason to believe that Cruz for President and Bradley S. Knippa in his official capacity as treasurer (the “Committee” or “Respondent”) violated 52 U.S.C. § 30125(e) and 11 C.F.R. § 300.61 by soliciting unlimited contributions to an independent-expenditure-only committee. The Commission also authorized pre-probable cause conciliation with the Committee and approved a conciliation agreement.¹

We recommend that the Commission

¹ Certification, MUR 7048 (Apr. 9, 2019).

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1 accept the signed agreement. A redlined version of the conciliation agreement highlighting
2 changes made to the agreement originally approved by the Commission is attached.³

3 In addition, at the time it made its reason-to-believe finding as to the Committee, the
4 Commission determined to take no action with respect to J. Keet Lewis (“Lewis”) — the
5 Committee’s agent who made the solicitation at issue — and Senator Ted Cruz (“Cruz”) as to the
6 allegation that either of those respondents violated 52 U.S.C. § 30125(e) and 11 C.F.R. § 300.61.
7 For the reasons discussed below, we recommend that the Commission dismiss the allegations as
8 to Lewis and Cruz and close the entire file.

3 Attach. 2.

III. Disposition of Remaining Respondents

At the time we recommended that the Commission take no action with respect to Lewis regarding the solicitation at issue, we explained that, should the Committee conciliate with the Commission, we would recommend dismissal as to Lewis.⁶ Similarly, in recommending that the Commission take no action against Cruz, we explained that, while we lacked information regarding his involvement in the solicitation or event at issue, it was conceivable that additional factual information would come to light during conciliation; and should the Committee conciliate with the Commission, we would recommend dismissal as to Cruz, as well.⁷

During the course of conciliation, no pertinent information has come to light about Cruz's involvement. Thus, we recommend dismissing the allegations as to Lewis and Cruz and closing the entire file.

RECOMMENDATIONS:

1. Accept the attached conciliation agreement;
2. Dismiss the allegation that J. Keet Lewis violated 52 U.S.C. § 30125(e) and 11 C.F.R. § 300.61;
3. Dismiss the allegation that Senator Ted Cruz violated 52 U.S.C. § 30125(e) and 11 C.F.R. § 300.61;
4. Approve the appropriate letters; and
5. Close the file.

⁶ FGCR, MUR 7048 (Cruz for President, *et al.*) at 14.

⁷ *Id.*