



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson *LJS*
Acting General Counsel

Charles Kitcher *CK*
Acting Associate General Counsel for Enforcement

Stephen Gura *SG*
Deputy Associate General Counsel

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Attorney

SUBJECT: MUR 7102 (Keefe, Keefe & Unsell, P.C.)

RE: Proposed Conciliation Agreement for Probable Cause Conciliation

Attached is a proposed conciliation agreement for probable cause conciliation with Keefe, Keefe & Unsell, P.C. (the "Firm") and Thomas Q. Keefe, Jr. ("Keefe"). The proposed agreement is for the Commission's consideration along with the Office of General Counsel's Notice to the Commission Following the Submission of Probable Cause Brief in MUR 7102 ("OGC Notice"), which is being submitted to the Commission simultaneously with this Memorandum. The OGC Notice informs the Commission that this Office intends to proceed with the recommendation that the Commission find probable cause to believe that Keefe, Keefe & Unsell, P.C. violated 52 U.S.C. §§ 30122 and 30118(a), and 11 C.F.R. §§ 110.4(b)(1)(i), 114.2(b) and (f); and that Thomas W. Keefe, Jr. violated 52 U.S.C. §§ 30122, 30118(a), and 11 C.F.R. §§ 110.4(b)(1)(i), and 114.2(e) in connection with the \$18,900 in Firm employee contributions to the congressional campaign of CJ Baricevic, and the \$10,800 in Firm employee contributions to the Hillary Clinton campaign.¹

¹ See Certification, MUR 7102 (Keefe, Keefe & Unsell, P.C.) (June 25, 2019).

We recommend that the Commission approve the attached conciliation agreement.

RECOMMENDATIONS

1. Approve the attached conciliation agreement.
2. Approve the appropriate letter.