



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

April 20, 2021

Dan Backer, Esq.  
441 North Lee Street, Suite 300  
Alexandria, VA 22314  
dan@political.law

RE: MURs 7165 & 7196

Dear Mr. Backer:

On March 2, 2021, the Federal Election Commission (the “Commission”) notified you that the Commission, on February 25, 2021, found reason to believe that Great America PAC and you in your official capacity as treasurer (“GAP”) knowingly and willfully violated 52 U.S.C. § 30121(a)(2), a provision of the Federal Election Campaign Act of 1971, as amended (the “Act”), and the Commission’s regulation at 11 C.F.R. § 110.20(g), and provided GAP with the Factual and Legal Analysis, which formed a basis for the Commission’s finding. At your request, on April 19, 2021, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you and your client agree with the provisions of the enclosed agreement, please sign and return it, to the Commission. In light of the fact that conciliation negotiations prior to a finding of probable cause to believe are limited to a maximum of 60 days, you should respond to this notification as soon as possible.

During conciliation, you may submit any factual or legal materials that you believe are relevant to the resolution of this matter. Because the Commission only enters into pre-probable cause conciliation in matters that it believes have a reasonable opportunity for settlement, we may proceed to the next step in the enforcement process if a mutually acceptable conciliation agreement cannot be reached within sixty days. *See* 52 U.S.C. § 30109(a), 11 C.F.R. Part 111

Dan Backer, Esq.  
MURs 7165 & 7196 (Great America PAC)  
Page 2

(Subpart A). Please note that once the Commission enters the next step in the enforcement process, it may decline to engage in further settlement discussions until after making a probable cause finding.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact me at [sghosh@fec.gov](mailto:sghosh@fec.gov) or (202) 251-3381.

Sincerely,



Saurav Ghosh  
Attorney