



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

August 27, 2021

**TO:** The Commission

**FROM:** Lisa J. Stevenson *LS* by SG  
Acting General Counsel

Charles Kitcher *CK* by SG  
Associate General Counsel for Enforcement

Claudio J. Pavia *CP*  
Acting Assistant General Counsel

Saurav Ghosh *SG*  
Attorney

**SUBJECT:** MURs 7165 and 7196 (Jesse Benton)

**RE:** Proposed Probable Cause Conciliation Agreement

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Attached is a proposed conciliation agreement for probable cause conciliation in these matters with Jesse Benton ("Respondent").

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 Briefs ("OGC Notice"), which is being submitted to the Commission 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 Respondent knowingly and willfully violated 52 U.S.C. § 30121(a)(2) and 11 C.F.R. § 110.20(g) by knowingly soliciting a contribution from a foreign national.

MURs 7165 and 7196 (Jesse Benton)  
Probable Cause Conciliation Memo  
Page 2 of 2

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3    **RECOMMENDATIONS:**

- 4           1.     Authorize conciliation with Jesse Benton;  
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6           2.     Approve the attached conciliation agreement; and  
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8           3.     Approve the appropriate letter.

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