



FEDERAL ELECTION COMMISSION

MEMORANDUM

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4 **TO:** The Commission
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6 **FROM:** Lisa J. Stevenson
7 Acting General Counsel
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9 Kathleen M. Guith
10 Associate General Counsel for Enforcement
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12 Stephen Gura
13 Deputy Associate General Counsel for Enforcement
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15 **BY:** Mark Shonkwiler *MS*
16 Assistant General Counsel
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18 Saurav Ghosh *Sg*
19 Attorney
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21 **SUBJECT:** MUR 7223 (Applegate for Congress) Pre-Probable Cause Conciliation
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24 On March 6, 2018, the Commission found reason to believe that Applegate for Congress
25 and Jane Leiderman in her official capacity as treasurer ("Committee"), violated 52 U.S.C.
26 § 30104(b) by failing to report \$373,530.14 in disbursements prior to the 2016 general election.
27 The Commission authorized the Office of the General Counsel to engage in pre-probable cause
28 conciliation with the Committee. Attached is a negotiated conciliation agreement that has been
29 signed by counsel for the Committee. Attachment I. We recommend that the Commission
30 accept this agreement and close the file in this matter.
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1 We believe this negotiated settlement represents an acceptable resolution of the matter.
2 We therefore recommend that the Commission accept the signed conciliation agreement with the
3 Committee and close the file.

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5 **RECOMMENDATIONS:**

6 1. Accept the attached conciliation agreement.

7 2. Approve the appropriate letter.

8 3. Close the file.

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