



FEDERAL ELECTION COMMISSION
Washington, DC 20463

1 **MEMORANDUM**

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3 **TO:** The Commission

4
5 **FROM:** Lisa J. Stevenson
6 Acting General Counsel

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8 **BY:** Kathleen M. Guith *kg*
9 Associate General Counsel for Enforcement

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11 Mark Shonkwiler *MS*
12 Assistant General Counsel

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14 Peter Reynolds *PTR*
15 Attorney

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17 **RE:** MUR 7248 (Cancer Treatment Centers of America Global, Inc., *et al.*) –
18 Recommendation to Revise Conciliation Agreement to Include Regional Medical
19 Centers – 48 Hour Tally
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22 On May 9, 2017, the Commission voted to find reason to believe that Cancer Treatment
23 Centers of America Global, Inc. (“CTCA”), Eastern Regional Medical Center, Inc., Midwestern
24 Regional Medical Center, Inc., Southeastern Regional Medical Center, Inc., Southwestern
25 Regional Medical Center, Inc., and Western Regional Medical Center, Inc. (together, the
26 “Regional Medical Centers”), violated 52 U.S.C. § 30118(a) and 30122.¹ On the
27 recommendation of the Office of the General Counsel (“OGC”), the Commission also voted to
28 enter into conciliation and approve the proposed Conciliation Agreement with respect to CTCA,
29 Stephen Bonner, Robert Mayo, and Richard Stephenson.

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31 OGC’s recommendations in the First General Counsel’s Report regarding conciliation²
32 inadvertently omitted the Regional Medical Centers.³ We would like to correct this omission by
33 recommending that the Commission revise the prior authorization of conciliation and the
34 previously authorized Conciliation Agreement to include the Regional Medical Centers. We

1 Certification, P-MUR 581 (Cancer Treatment Centers of America Global, Inc.) (May 9, 2017).

2 First Gen. Counsel’s Rpt. at 28, P-MUR 581 (Mar. 22, 2017) (recommendations #6 and #7).

3 See Certification ¶¶ 2.f, 2.g., P-MUR 581.

1 have attached a markup of the Conciliation Agreement that was approved by the Commission on
2 May 9, 2017, which includes the Regional Medical Centers.
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4 **RECOMMENDATIONS:**
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- 6 1. Revise the prior authorization of conciliation to include the following additional
7 respondents: Eastern Regional Medical Center, Inc., Midwestern Regional Medical
8 Center, Inc., Southeastern Regional Medical Center, Inc., Southwestern Regional
9 Medical Center, Inc., and Western Regional Medical Center, Inc.
10 2. Revise the previously approved Conciliation Agreement to include the following
11 additional respondents: Eastern Regional Medical Center, Inc., Midwestern Regional
12 Medical Center, Inc., Southeastern Regional Medical Center, Inc., Southwestern
13 Regional Medical Center, Inc., and Western Regional Medical Center, Inc.
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