



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

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2 TO: The Commission  
3  
4 FROM: Lisa J. Stevenson  
5 Acting General Counsel  
6  
7 BY: Kathleen M. Guith *KMG*  
8 Associate General Counsel  
9  
10 Mark Shonkwiler *MS*  
11 Assistant General Counsel  
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13 Peter Reynolds *PTR*  
14 Attorney  
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16 SUBJECT: MUR 7248 (Cancer Treatment Centers of America, *et al.*)  
17 Pre-Probable Cause Conciliation  
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19 I. INTRODUCTION  
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21 On May 9, 2017, the Commission found reason to believe that Cancer Treatment Centers  
22 of America Global, Inc. ("CTCA") and the Regional Medical Centers,<sup>1</sup> violated 52 U.S.C.  
23 §§ 30118 and 30122 by making prohibited corporate contributions in the name of another person  
24 based on a *sua sponte* submission by CTCA. The Commission also found reason to believe that  
25 CTCA executives Stephen Bonner and Robert Mayo violated 52 U.S.C. §§ 30118 and 30122 by  
26 knowingly assisting others in making contributions in the name of another person and consenting  
27 to the making of prohibited corporate contributions; and that CTCA Chairman Richard  
28 Stephenson violated 52 U.S.C. § 30118 by consenting to prohibited corporate contributions.<sup>2</sup> On  
29 May 24, 2017, the Commission authorized the Office of the General Counsel to settle the  
30 violations through pre-probable cause conciliation and approved a single joint conciliation  
31 agreement for all four respondents.<sup>3</sup> Attached is a revised agreement negotiated with the  
32 respondents which would resolve the violations. For the reasons set forth below, we believe the

<sup>1</sup> Eastern Regional Medical Center, Inc., Midwestern Regional Medical Center, Inc., Southeastern Regional Medical Center, Inc., Southwestern Regional Medical Center, Inc., and Western Regional Medical Center, Inc.

<sup>2</sup> Certification, MUR 7248 (formerly P-MUR 581) (Cancer Treatment Centers of America Global, Inc., *et al.*) (May 9, 2017) (amended).

<sup>3</sup> Certification, MUR 7248 (May 24, 2017); *see* Memorandum to the Commission, MUR 7248 (May 16, 2017).



1 **III. RECOMMENDATIONS**  
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- 3 1. Find no reason to believe that Richard Stephenson violated 52 U.S.C. § 30122.  
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5 2. Accept the attached signed joint conciliation agreement with Cancer Treatment  
6 Centers of America Global, Inc., the Regional Medical Centers, Stephen Bonner,  
7 Robert Mayo, and Richard Stephenson.  
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9 3. Approve the appropriate letters.  
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11 4. Close the file.  
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