



FEDERAL ELECTION COMMISSION
Washington, DC 20463

March 23, 2021

MEMORANDUM

TO: The Commission

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

Charles Kitcher *CK* by SG
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SUBJECT: MUR 7271 (DNC, *et al.*)

RE: Proposed Probable Cause Conciliation Agreements

Attached are (1) a proposed conciliation agreement for probable cause conciliation with the Democratic National Committee and Virginia McGregor in her official capacity as treasurer (the "DNC") and (2) a proposed conciliation agreement for probable cause conciliation with Alexandra Chalupa and Chalupa & Associates, LLC ("C&A").

The proposed agreements contain a summary of the relevant facts and admissions by the DNC, Chalupa, and C&A to violations of 52 U.S.C. § 30121(a)(2) and 11 C.F.R. § 110.20(g). The proposed agreements are for the Commission's consideration along with the Office of General Counsel's Notices to the Commission Following the Submission of Probable Cause Briefs ("OGC Notices"), which are being submitted to the Commission simultaneously with this Memorandum. The OGC Notices inform the Commission that this Office intends to proceed with the recommendation that the Commission find probable cause to believe that the DNC,

Chalupa, and C&A violated 52 U.S.C. § 30121(a)(2) and 11 C.F.R. § 110.20(g) by knowingly soliciting an in-kind contribution from a foreign national.

RECOMMENDATIONS:

1. Approve the attached conciliation agreement with the Democratic National Committee and Virginia McGregor in her official capacity as treasurer;
2. Approve the attached conciliation agreement with Alexandra Chalupa and Chalupa & Associates, LLC; and
3. Approve the appropriate letters.