



FEDERAL ELECTION COMMISSION

Washington, D.C. 20463

1 February 17, 2022

2 **MEMORANDUM**

3 **TO:** The Commission

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

6 Charles Kitcher
7 Associate General Counsel for Enforcement

8 **BY:** Mark Allen *MA*
9 Assistant General Counsel

10 Richard L. Weiss *RLW*
11 Attorney

12 **SUBJECT:** MURs 7291 and 7449
13 (DNC Services Corp./Democratic National Committee, *et al.*)
14 Recommendation to Accept Signed Conciliation Agreements

15 **I. INTRODUCTION**

16 On December 16, 2021, the Commission found probable cause to believe that DNC
17 Services Corporation/Democratic National Committee and Virginia McGregor in her official
18 capacity as treasurer (the “DNC”) violated 52 U.S.C. § 30104(b)(5)(A) and (b)(6)(B)(v) and
19 11 C.F.R. § 104.3(b)(3)(i) of the Federal Election Campaign Act of 1971, as amended (the
20 “Act”) and its regulations, by failing to report the proper purpose of the funds the DNC paid to
21 Perkins Coie for work performed by Fusion GPS.¹ The Commission also found probable cause
22 to believe that Hillary for America and Elizabeth Jones in her official capacity as treasurer
23 (“HFA”) violated 52 U.S.C. § 30104(b)(5)(A) and 11 C.F.R. § 104.3(b)(4)(i) of the Act and its
24 regulations, by failing to report the proper purpose of the funds HFA paid to Perkins Coie for
25 work performed by Fusion GPS.² On December 16, 2021, the Commission approved
26 conciliation agreements for the DNC and HFA.³

1 Certification (“Cert.”) (DNC) (Dec. 17, 2021).

2 Cert. (Hillary for America) (Dec. 17, 2021).

3 Cert. ¶ 1 (Proposed CA for PC) (Dec. 17, 2021).

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1 Attached are negotiated conciliation agreements signed by counsel.

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26 We believe these settlements represent an acceptable resolution of these matters. We
27 therefore recommend that the Commission accept the signed conciliation agreements with the
28 DNC and HFA.

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30 **II. RECOMMENDATIONS**

31 1. Accept the attached conciliation agreement with DNC Services
32 Corporation/Democratic National Committee and Virginia McGregor in her official
33 capacity as treasurer ;

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35 2. Accept the attached conciliation agreement with Hillary for America and Elizabeth
36 Jones in her official capacity as treasurer; and

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1 3. Approve the appropriate letters.

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