



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

VIA E-Mail and U.S. Mail

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DEC 09 2019

RE: MURs 7337 and 7344
Conservative Leadership for Arizona
and Tim Sifert in his official
capacity as treasurer

Dear Mr. Wang:

We received your response dated October 8, 2019, on behalf of your clients, Conservative Leadership for Arizona and Tim Sifert in his official capacity as treasurer (“Committee”), to the Commission’s reason to believe finding and requests for written answers and production of documents.

You have provided no written answers or documents in response to the Commission’s requests. Instead, you state circumstances such that “obtaining responses to the Commission’s broad requests . . . would be difficult, to say the least.” It is not clear based upon your response what specific difficulties exist for the Committee and what efforts, if any, the Committee has made to collect responsive information and documents. To the extent the Committee needs an extension of time in which to provide written answers and documents in response to the Commission’s requests, such an extension would be available in exchange for the Committee tolling the statute of limitations.

In the meantime, as stated in the Commission’s complaint notification letter and reason to believe notification letter, the Committee has a legal obligation to preserve all documents, records, and materials relating to the subject matter of the complaint until such time it is notified that the Commission has closed its file in this matter. *See* 18 U.S.C. § 1519. In addition, political committees are subject to recordkeeping requirements under the Federal Election Campaign Act of 1971, as amended (the “Act”) and Commission regulations. *See* 52 U.S.C. § 30102(d); 11 C.F.R. § 104.14(b).

Your October 8, 2019, response also includes a request that the Commission enter into pre-probable cause conciliation with the Committee, and a proposed conciliation agreement to be presented to the Commission for its consideration. As you may be aware, the Commission

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currently lacks a quorum to approve a conciliation agreement. Please advise whether the Committee continues to request pre-probable cause conciliation in light of these circumstances and, if so, whether the Committee is willing to toll the statute of limitations until the Commission has enough members to act on your request.

If you have any questions, or would like to discuss this matter further, please contact me at (202) 694-1616.

Sincerely,

Delbert K. Rigsby
Delbert K. Rigsby
Attorney