



## FEDERAL ELECTION COMMISSION

Washington, DC 20463

1 August 30, 2022

2 **MEMORANDUM**

3       **TO:**       The Commission

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

6                    Charles Kitcher *CK*  
7                    Associate General Counsel for Enforcement

8                    Claudio J. Pavia *CP*  
9                    Deputy Associate General Counsel for Enforcement

10                  Mark Allen *MA*  
11                  Assistant General Counsel

12                  Delbert K. Rigsby *DKR*  
13                  Attorney

14       **RE:**       MUR 7337 (Debbie Lesko, *et al.*) Proposed Conciliation Agreement for Probable  
15                  Cause Conciliation

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16                  Attached is a proposed conciliation agreement for probable cause conciliation with  
17                  Debbie Lesko and Re-Elect Debbie Lesko for Senate (the "State Committee"). The proposed  
18                  agreement is for the Commission's consideration along with the Office of General Counsel's  
19                  Notice to the Commission Following the Submission of Probable Cause Brief in MUR 7337  
20                  ("OGC Notice") which is being submitted to the Commission simultaneously with this  
21                  Memorandum. The OGC Notice informs the Commission that this Office intends to proceed  
22                  with the recommendation that the Commission find probable cause to believe that Debbie Lesko  
23                  and the State Committee violated 52 U.S.C. § 30125(e)(1)(A) by transferring funds in the  
24                  amount of \$50,000 to Conservative Leadership for Arizona, an independent expenditure-only  
25                  political committee, that were used in connection with a federal election but were not subject to  
26                  the reporting requirements of the Act.

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MUR 7337 (Debbie Lesko, *et al.*)

Memo to the Commission

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12        We recommend that the Commission approve the attached conciliation agreement.

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14        **RECOMMENDATIONS**

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16        1.        Approve the attached conciliation agreement.

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18        2.        Approve the appropriate letter.

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<sup>1</sup>        11 C.F.R. § 111.24(a)(1); *see* Civil Monetary Penalties Annual Inflation Adjustments, 86 Fed. Reg. 73,658 (Dec. 28, 2021). For pre-probable cause conciliation, the Commission approved a civil penalty calculated at the statutory penalty minus a 25% discount for pre-probable cause conciliation. Certification ¶ 1.a (Apr. 1, 2021).

<sup>2</sup>        Certification ¶ 4.b (July 29, 2019); Gen. Counsel's Brief at 14.