


FEDERAL ELECTION COMMISSION

Washington, DC 20463

August 30, 2022

MEMORANDUM
TO: The Commission

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

 Charles Kitcher *CK*
 Associate General Counsel for Enforcement

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

 Mark Allen *MA*
 Assistant General Counsel

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 Attorney

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

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

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

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We recommend that the Commission approve the attached conciliation agreement.

RECOMMENDATIONS

1. Approve the attached conciliation agreement.
2. Approve the appropriate letter.

¹ 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).

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