



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

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4 **TO:** The Commission
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6 **FROM:** Lisa J. Stevenson
7 Acting General Counsel
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9 Kathleen M. Guith
10 Associate General Counsel for Enforcement
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12 Stephen Gura
13 Deputy Associate General Counsel for Enforcement
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15 **BY:** Mark Allen *MA*
16 Assistant General Counsel
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18 Nicholas O. Mueller *NOM*
19 Attorney
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21 **SUBJECT:** MUR 7398 (Jack Graham for U.S. Senate)
22 Pre-Probable Cause Conciliation Agreement
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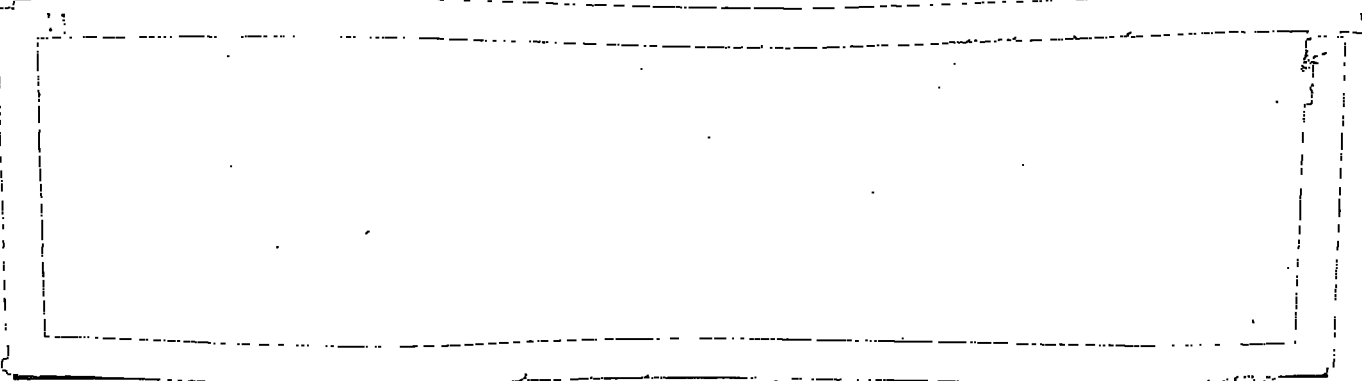
24 On May 22, 2018, the Commission found reason to believe that Jack Graham for U.S.
25 Senate and Cheryl S. Klein in her official capacity as treasurer ("Committee") violated 52 U.S.C.
26 § 30104(b) and 11 C.F.R. § 104.3(b) by failing to disclose disbursements totaling \$252,571 on its
27 original 2016 12-Day Pre-Primary Report.

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1 MUR 7398 Commission Certification at ¶ 2b (May 22, 2018).

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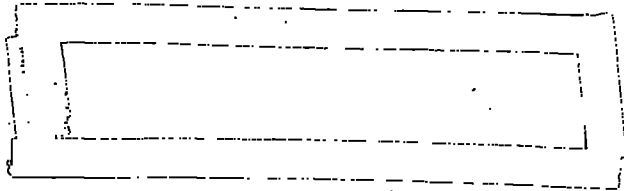


10 we recommend that the Commission accept the signed agreement.

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12 **RECOMMENDATIONS:**

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14 1. Accept the attached signed conciliation agreement with Jack Graham for U.S.
15 Senate and Cheryl S. Klein in her official capacity as treasurer;
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17 2. Approve the appropriate letter; and
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19 3. Close the file.

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4 See Attach 1 ¶ VI.1.

5 See, e.g., MUR 7374 (Wright 2016) (Commission accepted \$5,000 civil penalty – reduced from \$43,000 opening offer – from defunct committee that had no cash on hand); MUR 6887 (McCotter Congressional Committee) (Commission accepted \$5,000 civil penalty – reduced from \$23,000 opening offer – from defunct committee that had no cash on hand).

6 See Attach 1 ¶ IV.7.

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