



FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Charles Kitcher
Associate General Counsel for Enforcement

BY: Mark Allen *MA*
Assistant General Counsel

Christine C. Gallagher *Cg*
Attorney

SUBJECT: MUR 7406 (Heller for Senate)
Recommendation to Accept Signed Conciliation Agreement

On May 6, 2021, the Commission found reason to believe that Heller for Senate and Chrissie Hastie in her official capacity as treasurer (the "Committee") violated 52 U.S.C. §§ 30118 and 30122 by knowingly accepting corporate contributions made in the name of another.¹ The Commission also authorized pre-probable cause to believe conciliation and approved a conciliation agreement

Attached is a proposed conciliation agreement signed by the Committee's treasurer that resolves the Commission's prior reason to believe finding.

The Committee has paid the civil penalty and made the disgorgement to the U.S. Treasury.³

RECOMMENDATIONS:

1. Accept the attached conciliation agreement.
2. Approve the appropriate letters.
3. Close the file.

¹ Certification (May 12, 2021).

³ See Two-Way Memorandum from Anh Vuong, Financial Analyst to OGC Docket, Account Determination For Funds Received (Aug.23, 2021); see also Email from Chrissie Hastie, Treasurer, to Christine C. Gallagher, Attorney, FEC (Aug. 24, 2021 3:08 PM EST) (attaching copy of cleared disgorgement check to U.S. Treasury).