



FEDERAL ELECTION COMMISSION
Washington, DC 20463

December 15, 2021

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2 **MEMORANDUM**

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4 **TO:** The Commission

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

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9 Charles Kitcher *CK*
10 Associate General Counsel for Enforcement

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12 Mark Allen *MA*
13 Assistant General Counsel

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15 Richard L. Weiss *RLW*
16 Attorney

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18 **SUBJECT:** MURs 7291 & 7449 (DNC)

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20 **RE:** Proposed Conciliation Agreement for Probable Cause Conciliation
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23 Attached is a proposed conciliation agreement for probable cause conciliation with DNC
24 Services Corporation/Democratic National Committee and Virginia McGregor in her official
25 capacity as treasurer (the "DNC"). The proposed agreement is for the Commission's
26 consideration along with the Office of General Counsel's Notice to the Commission Following
27 the Submission of Probable Cause Brief in MURs 7291 and 7449 ("OGC Notice"), which is
28 being submitted to the Commission simultaneously with this Memorandum. The OGC Notice
29 informs the Commission that this Office intends to proceed with the recommendation that the
30 Commission find probable cause to believe that the DNC violated 52 U.S.C. § 30104(b)(5)(A)
31 and (b)(6)(B)(v) and 11 C.F.R. § 104.3(b)(3)(i) by failing to report the proper purpose of the
32 funds the DNC paid to Perkins Coie for opposition research performed by Fusion GPS.
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1 We recommend that the Commission approve the attached conciliation agreement.

2 **RECOMMENDATIONS**

3 1. Approve the attached conciliation agreement; and

4 2. Approve the appropriate letter.

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