



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 (HFA)

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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
24 Hillary for America and Elizabeth Jones in her official capacity as treasure ("HFA"). The
25 proposed agreement is for the Commission's consideration along with the Office of General
26 Counsel's Notice to the Commission Following the Submission of Probable Cause Brief in
27 MURs 7291 and 7449 ("OGC Notice"), which is being submitted to the Commission
28 simultaneously with this Memorandum. The OGC Notice informs the Commission that this
29 Office intends to proceed with the recommendation that the Commission find probable cause to
30 believe that HFA violated 52 U.S.C. § 30104(b)(5)(A) and 11 C.F.R. § 104.3(b)(4)(i) by failing
31 to report the proper purpose of the funds HFA paid to Perkins Coie for opposition research
32 performed by Fusion GPS.
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MURs 7291 and 7449 (HFA)
Memorandum to Commission RE: Probable Cause Conciliation
Page 2 of 2

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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