



FEDERAL ELECTION COMMISSION
Washington, DC 20463

1 December 15, 2021

MEMORANDUM

4 TO: The Commission

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

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

12 Mark Allen *MA*
13 Assistant General Counsel

15 Richard L. Weiss *RLW*
16 Attorney

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

20 **RE:** Proposed Conciliation Agreement for Probable Cause Conciliation

Attached is a proposed conciliation agreement for probable cause conciliation with Hillary for America and Elizabeth Jones in her official capacity as treasure (“HFA”). 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 MURs 7291 and 7449 (“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 HFA violated 52 U.S.C. § 30104(b)(5)(A) and 11 C.F.R. § 104.3(b)(4)(i) by failing to report the proper purpose of the funds HFA 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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