



FEDERAL ELECTION COMMISSION

Washington, D.C. 20463

February 17, 2022

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

Richard L. Weiss *RLW*
Attorney

SUBJECT: MURs 7291 and 7449
(DNC Services Corp./Democratic National Committee, *et al.*)
Recommendation to Accept Signed Conciliation Agreements

I. INTRODUCTION

On December 16, 2021, the Commission found probable cause to believe that DNC Services Corporation/Democratic National Committee and Virginia McGregor in her official capacity as treasurer (the “DNC”) violated 52 U.S.C. § 30104(b)(5)(A) and (b)(6)(B)(v) and 11 C.F.R. § 104.3(b)(3)(i) of the Federal Election Campaign Act of 1971, as amended (the “Act”) and its regulations, by failing to report the proper purpose of the funds the DNC paid to Perkins Coie for work performed by Fusion GPS.¹ The Commission also found probable cause to believe that Hillary for America and Elizabeth Jones in her official capacity as treasurer (“HFA”) violated 52 U.S.C. § 30104(b)(5)(A) and 11 C.F.R. § 104.3(b)(4)(i) of the Act and its regulations, by failing to report the proper purpose of the funds HFA paid to Perkins Coie for work performed by Fusion GPS.² On December 16, 2021, the Commission approved conciliation agreements for the DNC and HFA.³

¹ Certification (“Cert.”) (DNC) (Dec. 17, 2021).

² Cert. (Hillary for America) (Dec. 17, 2021).

³ Cert. ¶ 1 (Proposed CA for PC) (Dec. 17, 2021).

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1 Attached are negotiated conciliation agreements signed by counsel.

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26 We believe these settlements represent an acceptable resolution of these matters. We
27 therefore recommend that the Commission accept the signed conciliation agreements with the
28 DNC and HFA.

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30 **II. RECOMMENDATIONS**

31 1. Accept the attached conciliation agreement with DNC Services
32 Corporation/Democratic National Committee and Virginia McGregor in her official
33 capacity as treasurer ;

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35 2. Accept the attached conciliation agreement with Hillary for America and Elizabeth
36 Jones in her official capacity as treasurer; and

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1 3. Approve the appropriate letters.

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