



FEDERAL ELECTION COMMISSION
Washington, DC 20463

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2 TO: The Commission
3
4 FROM: Lisa J. Stevenson
5 Acting General Counsel
6
7 Charles Kitcher
8 Associate General Counsel for Enforcement
9
10 BY: Mark Shonkwiler *MS*
11 Assistant General Counsel
12
13 Saurav Ghosh *SG/ms*
14 Acting Assistant General Counsel
15
16 SUBJECT: MUR 7454 (Highway 76 LLC) - Pre-Probable Cause Conciliation
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18 DATE: December 1, 2021

19 On May 20, 2021, the Commission found reason to believe that Highway 76 LLC
20 (“Highway 76”) violated 11 C.F.R. § 110.1(g)(5), and authorized pre-probable cause conciliation
21 (“PPCC”) in this matter with an instruction to the Office of the General Counsel (“OGC”) not to
22 seek a monetary penalty.¹ The Commission, on October 13, 2021, further directed OGC to
23 incorporate specific language in the conciliation agreement with another Respondent in this
24 matter,
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¹ Certification ¶¶ 2, 8, MUR 7454 (May 20, 2021); *see also* Certification, MUR 7454 (July 26, 2021) (approving Factual and Legal Analyses, as edited by the Commission).

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Memorandum to the Commission re: Pre-Probable Cause Conciliation
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We therefore recommend that the Commission accept the attached signed agreement and close the file as to Highway 76.

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1 **RECOMMENDATIONS**

- 2 1. Accept the attached signed conciliation agreement with Highway 76 LLC.
- 3 2. Close the file as to Highway 76 LLC.
- 4 3. Approve the appropriate letter.

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