



FEDERAL ELECTION COMMISSION
Washington, DC 20463

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2 TO: The Commission
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4 FROM: Lisa J. Stevenson
5 Acting General Counsel
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7 Charles Kitcher
8 Associate General Counsel for Enforcement
9
10 BY: Mark Shonkwiler *MS*
11 Assistant General Counsel
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13 SUBJECT: MUR 7454 (DefendArizona) - Pre-Probable Cause Conciliation
14
15 DATE: February 9, 2022

16 On May 20, 2021, the Commission found reason to believe that DefendArizona and
17 Benjamin Ottenhoff in his official capacity as treasurer (“DefendArizona”) violated 52 U.S.C.
18 30104(b) and 11 C.F.R. § 110.1(g)(2) and (4) in connection with how it reported contributions
19 from Blue Magnolia LLC and Highway 76 LLC, and authorized pre-probable cause conciliation
20 (“PPCC”) in this matter
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MUR 7454 (DefendArizona)
Memorandum to the Commission re: Pre-Probable Cause Conciliation
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19 We therefore recommend that the Commission
20 accept the attached signed agreement and close the file as to DefendArizona.

21 RECOMMENDATIONS

22 1. Accept the attached signed conciliation agreement with DefendArizona and
23 Benjamin Ottenhoff in in his official capacity as treasurer.

24 2. Close the file as to DefendArizona and Benjamin Ottenhoff in in his official
25 capacity as treasurer.

26 3. Approve the appropriate letter.

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