



FEDERAL ELECTION COMMISSION
Washington, DC 20463

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Charles Kitcher
Associate General Counsel for Enforcement

BY: Mark Shonkwiler *MS*
Assistant General Counsel

SUBJECT: MUR 7454 (DefendArizona) - Pre-Probable Cause Conciliation

DATE: February 9, 2022

On May 20, 2021, the Commission found reason to believe that DefendArizona and Benjamin Ottenhoff in his official capacity as treasurer (“DefendArizona”) violated 52 U.S.C. 30104(b) and 11 C.F.R. § 110.1(g)(2) and (4) in connection with how it reported contributions from Blue Magnolia LLC and Highway 76 LLC, and authorized pre-probable cause conciliation (“PPCC”) in this matter

MUR 7454 (DefendArizona)
Memorandum to the Commission re: Pre-Probable Cause Conciliation
Page 2 of 2

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29

We therefore recommend that the Commission accept the attached signed agreement and close the file as to DefendArizona.

RECOMMENDATIONS

1. Accept the attached signed conciliation agreement with DefendArizona and Benjamin Ottenhoff in in his official capacity as treasurer.
2. Close the file as to DefendArizona and Benjamin Ottenhoff in in his official capacity as treasurer.
3. Approve the appropriate letter.