



FEDERAL ELECTION COMMISSION
Washington, DC 20463

August 14, 2019

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Charles Kitcher
Acting Associate General Counsel
for Enforcement

Stephen Gura
Deputy Associate General Counsel
for Enforcement

BY: Mark Shonkwiler *MS*
Assistant General Counsel

SUBJECT: MUR 7467 (Freedom's Defense Fund)

RE: Pre-Probable Cause Conciliation Agreement

The Commission found reason to believe that Freedom's Defense Fund and Paul Kilgore in his official capacity as treasurer ("FDF") violated 52 U.S.C. §§ 30104(b)(4)(H)(iii), 30104(b)(8), and 30104(g)(2) and 11 C.F.R. §§ 104.3(d), 104.4, and 104.11 by failing to properly report its independent expenditures, failing to file 48-hour reports of expenditures, and failing to properly report its debts and obligations.¹ The Commission also authorized pre-probable cause conciliation and approved a conciliation agreement

In response to the Commission's reason to believe finding, FDF, which did not respond to Requests for Additional Information ("RFAI") or the notification that it had been referred,

¹ MUR 7467, Certification ¶ 2 (Aug. 8, 2018).

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Under the circumstances, including the change in treasurer and the recent efforts to work with RAD to correct its reporting, we believe that the negotiated agreement represents an acceptable resolution of this matter and we recommend that the Commission approve it.

RECOMMENDATIONS

1. Approve the attached conciliation agreement with Freedom's Defense Fund and Paul Kilgore in his official capacity as treasurer;
 2. Approve the appropriate letter;
 3. Close the file.
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