



**THE FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

November 9, 2022

**MEMORANDUM**

**TO:** The Commission

**FROM:** Lisa J. Stevenson  
Acting General Counsel

Charles Kitcher  
Associate General Counsel for Enforcement

**BY:** Anne B. Robinson *ABR*  
Assistant General Counsel

Elena Paoli *eip*  
Attorney

**SUBJECT:** MUR 7527 (News for Democracy) – Proposed Conciliation Agreement

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**I. INTRODUCTION**

On October 18, 2022, the Commission voted to find reason to believe that News for Democracy violated 52 U.S.C. § 30104(c)(1) by failing to report two Facebook ads as independent expenditures and 52 U.S.C. § 30120(a) by failing to include required disclaimers on those ads.<sup>1</sup> The Commission also voted to approve a Factual and Legal Analysis (“F&LA”), authorized pre-probable cause conciliation with News for Democracy, and directed the Office of General Counsel to draft a pre-probable cause conciliation agreement that is consistent with the F&LA

Attached for the Commission’s approval is a proposed conciliation agreement in accordance with the Commission’s instructions.

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<sup>1</sup> Certification ¶ 3 (Oct. 19, 2022).

<sup>2</sup> *Id.* ¶ 3-4.

1 **II. RECOMMENDATIONS**

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1. Approve the attached Conciliation Agreement; and
2. Send the appropriate letters.