



## FEDERAL ELECTION COMMISSION

Washington, D.C. 20463

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### MEMORANDUM

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4 **TO:** The Commission

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

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9 Charles Kitcher  
10 Associate General Counsel for Enforcement

11 **BY:** Jin Lee *JL*

12 Acting Assistant General Counsel

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14 Amanda Andrade *AA*  
15 Attorney

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17 **SUBJECT:** MUR 7577 (Ander PAC, *et al.*)  
18 Recommendation to Accept Signed Conciliation Agreement

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20 On February 25, 2021, the Commission found reason to believe that Ander PAC and  
21 Benjamin Ottenhoff in his official capacity as treasurer (the “Committee”) and Ander Crenshaw  
22 (collectively, “Respondents”) violated 52 U.S.C. § 30114(b) by expending campaign funds for  
23 Crenshaw’s personal use and authorized pre-probable cause conciliation.<sup>1</sup> Because the  
24 Committee had already terminated,<sup>2</sup> the Commission approved a Conciliation Agreement  
25 circulated by this Office

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<sup>1</sup> Cert. ¶ 4a, 4c, MUR 7577 (Ander PAC, *et al.*) (Apr. 1, 2021).

<sup>2</sup> On January 30, 2019, prior to the filing of the Complaint in this matter, the Commission’s Reports Analysis Division approved Ander PAC’s termination. *See* Termination Report (Jan. 30, 2019).

MUR 7577 (Ander PAC, *et al.*)  
Memorandum to the Commission  
Page 2 of 3

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MUR 7577 (Ander PAC, *et al.*)  
Memorandum to the Commission  
Page 3 of 3

1        We believe that the negotiated agreement represents an acceptable resolution of the  
2 matter and we recommend that the Commission accept the signed conciliation agreement.  
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4 **RECOMMENDATIONS:**

5        1. Accept the signed conciliation agreement with Ander Crenshaw;  
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7        2. Approve the appropriate letters; and  
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9        3. Close the file.  
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