



**FEDERAL ELECTION COMMISSION**

Washington, D.C. 20463

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2 **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

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12 **BY:** Jin Lee *JK*  
13 Acting Assistant General Counsel

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15 Amanda Andrade *AA*  
16 Attorney

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18 **SUBJECT:** MUR 7577 (Ander PAC, *et al.*)  
19 Recommendation to Accept Signed Conciliation Agreement  
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22 On February 25, 2021, the Commission found reason to believe that Ander PAC and  
23 Benjamin Ottenhoff in his official capacity as treasurer (the “Committee”) and Ander Crenshaw  
24 (collectively, “Respondents”) violated 52 U.S.C. § 30114(b) by expending campaign funds for  
25 Crenshaw’s personal use and authorized pre-probable cause conciliation.<sup>1</sup> Because the  
26 Committee had already terminated,<sup>2</sup> the Commission approved a Conciliation Agreement  
27 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).

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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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