



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
30
31

MEMORANDUM

September 9, 2021

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Charles Kitcher CK by ep
Associate General Counsel for Enforcement

BY: Elena Paoli *ep*
Attorney

SUBJECT: MUR 7587 (Sanders, *et al.*) – Pre-Probable Cause Conciliation Counteroffer

On March 9, 2021, the Commission found reason to believe that Bernard Sanders and Bernie 2016 and Susan Jackson in her official capacity as treasurer and Bernie 2020 and Lora Haggard in her official capacity as treasurer (“Committees” and collectively “Respondents”) violated 52 U.S.C. § 30121 and 11 C.F.R. §§ 110.20(g) and (i) by allowing foreign nationals to participate in election-related decisions of the Committees.¹

¹ Certification, MUR 7587 (April 7, 2021).

MUR 7587 (Sanders *et al.*)
Memo to the Commission
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
30
31
32
33
34
35
36

We recommend that the Commission reject Respondents’ August 26, 2021, conciliation offer, for the reasons stated above.

RECOMMENDATIONS:

1. Reject Respondents’ Redlined Conciliation Agreement dated August 26, 2021; and
2. Approve the appropriate letter.