



FEDERAL ELECTION COMMISSION

MEMORANDUM

1 **MEMORANDUM**
 2
 3 **TO:** The Commission
 4
 5 **FROM:** Lisa J. Stevenson
 6 Acting General Counsel
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 8 Charles Kitcher
 9 Associate General Counsel for Enforcement
 10
 11 **BY:** Mark D. Shonkwiler *MS*
 12 Assistant General Counsel
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 14 Kimberly D. Hart *KDH*
 15 Attorney
 16
 17 **SUBJECT:** MUR 7629 (Spano, *et al.*)
 18 Recommendation to Accept Signed Conciliation Agreement
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 21 On February 9, 2023, the Commission found reason to believe that: (1) Vincent Ross
 22 Spano (“Spano”) violated 52 U.S.C. § 30116(f) by accepting excessive contributions; (2) Ross Spano
 23 for Congress and Robert Phillips, III in his official capacity as treasurer (“Committee”) violated
 24 52 U.S.C. §§ 30116(f) and 30104(b)(3) by accepting excessive contributions and misreporting loans,
 25 and violated 11 C.F.R. § 103.3(b)(3) by failing to make timely refunds of excessive contributions.¹
 26 The Commission also authorized pre-probable cause conciliation for Vincent Ross Spano and Ross
 27 Spano for Congress and its treasurer.²

28 Attached is the revised conciliation agreement (“CA”) signed by Respondents Vincent
 29 Ross Spano and the Committee’s treasurer, Robert Phillips, III, that would settle the violations in
 30 this matter and a redlined version of the signed conciliation agreement.³ We recommend that the
 31 Commission accept the attached signed conciliation agreement and close the file as to all
 32 respondents in this matter.⁴

1 Cert., MUR 7629.

2 *Id.* The Commission also dismissed allegations as to donors Cary Carreno and Karen Hunt. *Id.*

3 *See* Attachs. 1-2.

4 The statute of limitations for this matter will begin to expire on June 28, 2023 through November 30, 2023.

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Therefore, we recommend that the Commission accept the signed conciliation agreement with the parties and close the file.

RECOMMENDATIONS

1. Accept the attached signed conciliation agreement;
2. Approve the appropriate letters; and
3. Close the file.