



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

**VIA CERTIFIED AND ELECTRONIC MAIL**  
**RETURN RECEIPT REQUESTED**

October 4, 2022

[klma@factdc.org](mailto:klma@factdc.org)

Kendra Arnold, Executive Director  
Foundation for Accountability & Civic Trust  
1717 K Street NW, Suite 900  
Washington, D.C. 20006

RE: MUR 7670

Dear Ms. Arnold:

This is in reference to the complaint you filed with the Federal Election Commission on December 13, 2019. Upon further review of the allegations contained in the complaint, information supplied by respondents, and after considering the circumstances of the matter, the Commission, on September 28, 2022, voted to dismiss the allegations that Hickenlooper for Colorado and Mark Turnage in his official capacity as treasurer (the "Hickenlooper Committee") violated 52 U.S.C. §§ 30116(f) or 30118(a) by knowingly accepting an excessive or prohibited in-kind contribution and 52 U.S.C. § 30104(b) by failing to disclose an in-kind contribution; that Putnam Partners, LLC violated 52 U.S.C. §§ 30116(a) or 30118(a) by making an excessive or prohibited in-kind contribution; that Hickenlooper for Colorado (State Committee) violated 11 C.F.R. § 110.3(d) by making an impermissible transfer of an asset to a federal committee; and that the Hickenlooper Committee violated 11 C.F.R. § 110.3(d) by receiving an impermissible transfer of a state committee's asset. The Commission further found no reason to believe that Hickenlooper 2020 and Blanca Uzeta O'Leary in her official capacity as treasurer and Giddy Up PAC and Stephanie Donner in her official capacity as treasurer violated the Act in connection with the allegations in this matter.

Documents related to the case will be placed on the public record within 30 days. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016). If a Statement of Reasons is issued by one or more Commissioners, it will be provided to you.

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The Federal Election Campaign Act of 1971, as amended, allows a complainant to seek judicial review of the Commission's dismissal of this action. *See* 52 U.S.C. § 30109(a)(8). If you have any questions, please contact Thaddeus H. Ewald, the attorney assigned to this matter, at (202) 694-1650 or [tewald@fec.gov](mailto:tewald@fec.gov).

Sincerely,

Lisa J. Stevenson  
Acting General Counsel

*Mark Allen*

By: Mark Allen  
Assistant General Counsel