



THE FEDERAL ELECTION COMMISSION
Washington, DC

November 8, 2024

MEMORANDUM

To: The Commission

From: Lisa J. Stevenson
Acting General Counsel

Adrienne Baranowicz
Deputy Associate General Counsel
for Enforcement

By: Anne B. Robinson *ABR*
Assistant General Counsel

Rachel Coll *RC*
Attorney

Re: MUR 7680 (Palazzo for Congress, *et al.*) – Pre-Probable Cause Conciliation
Counteroffer

I. BACKGROUND

The Commission previously found reason to believe that Steven Palazzo and Palazzo for Congress and Paul V. Breazeale in his official capacity as treasurer (the “Committee”) violated 52 U.S.C. § 30114(b) by converting campaign funds to personal use.¹ On December 15, 2023, the Commission authorized pre-probable cause conciliation and approved a conciliation agreement [REDACTED]

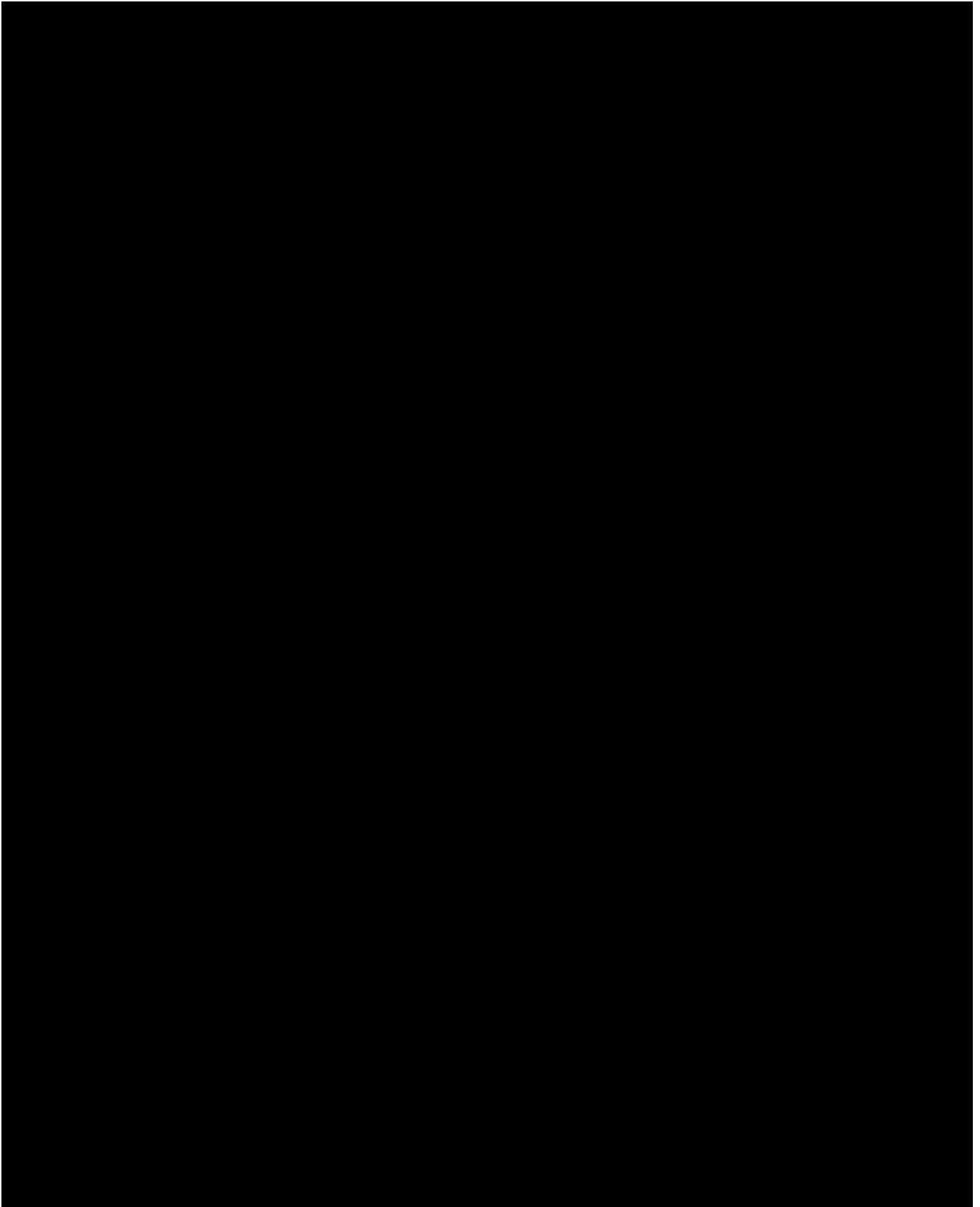
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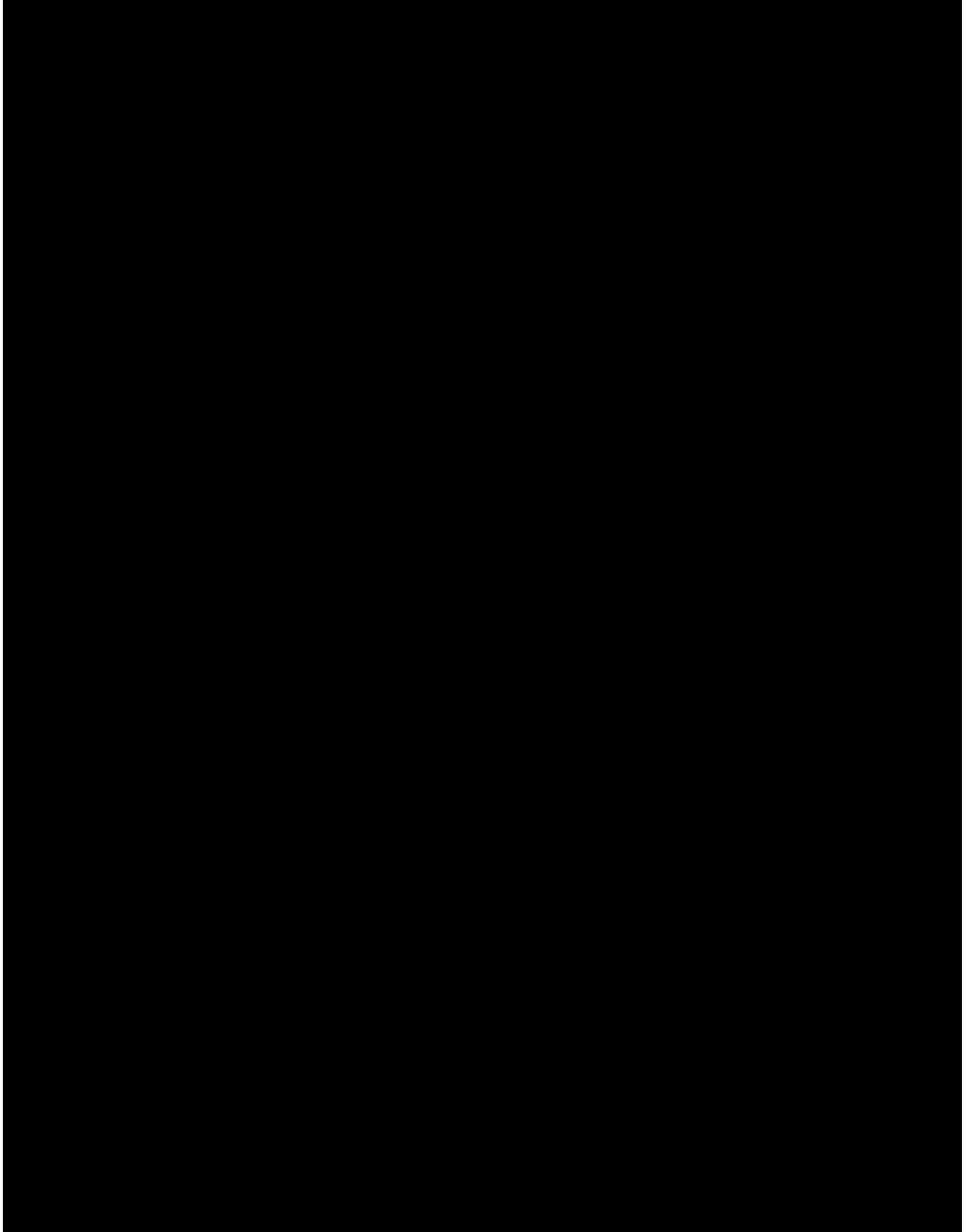
¹ Certification (“Cert.”), §§ 2.a., b., c. (Feb. 10, 2021).

[REDACTED]

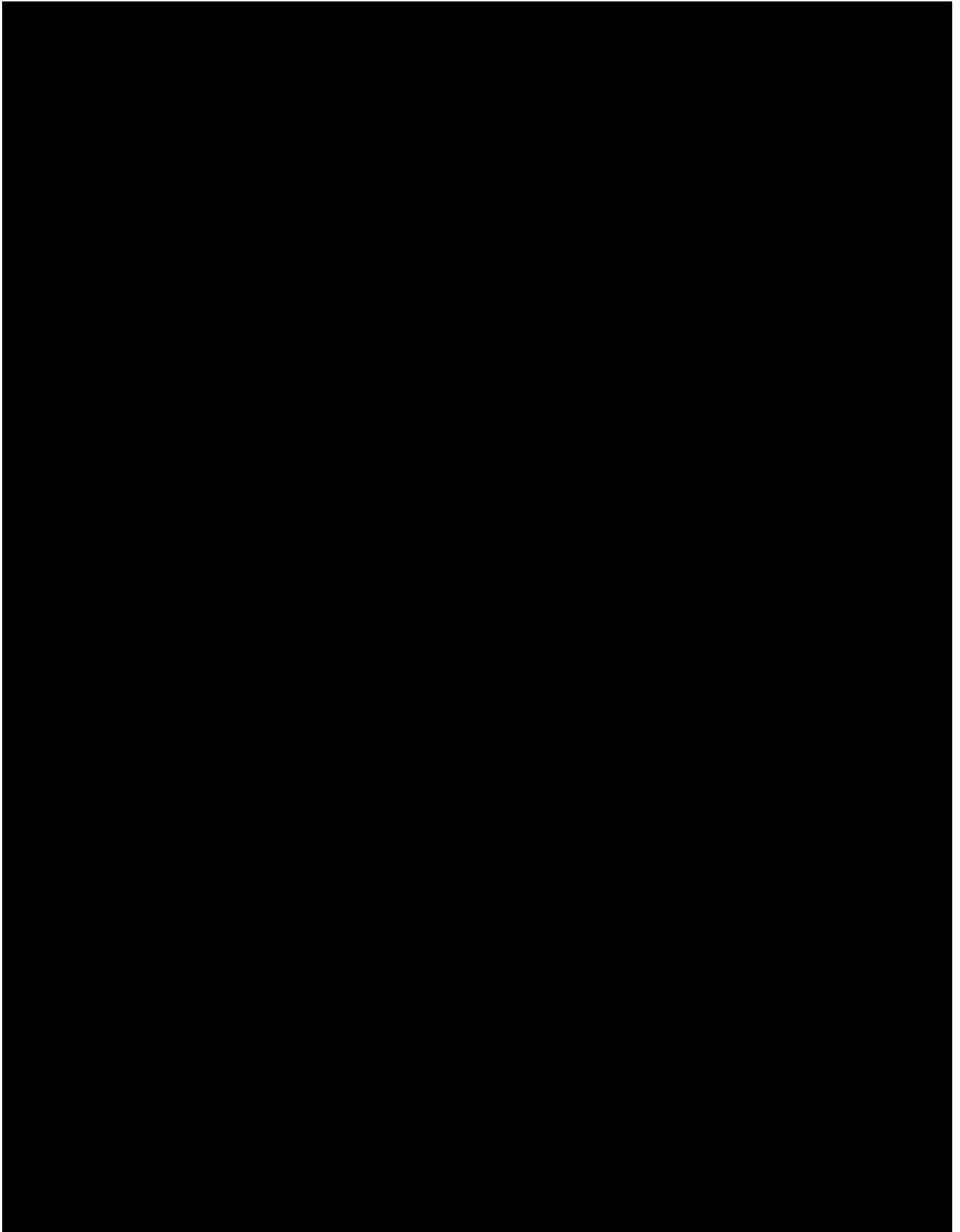
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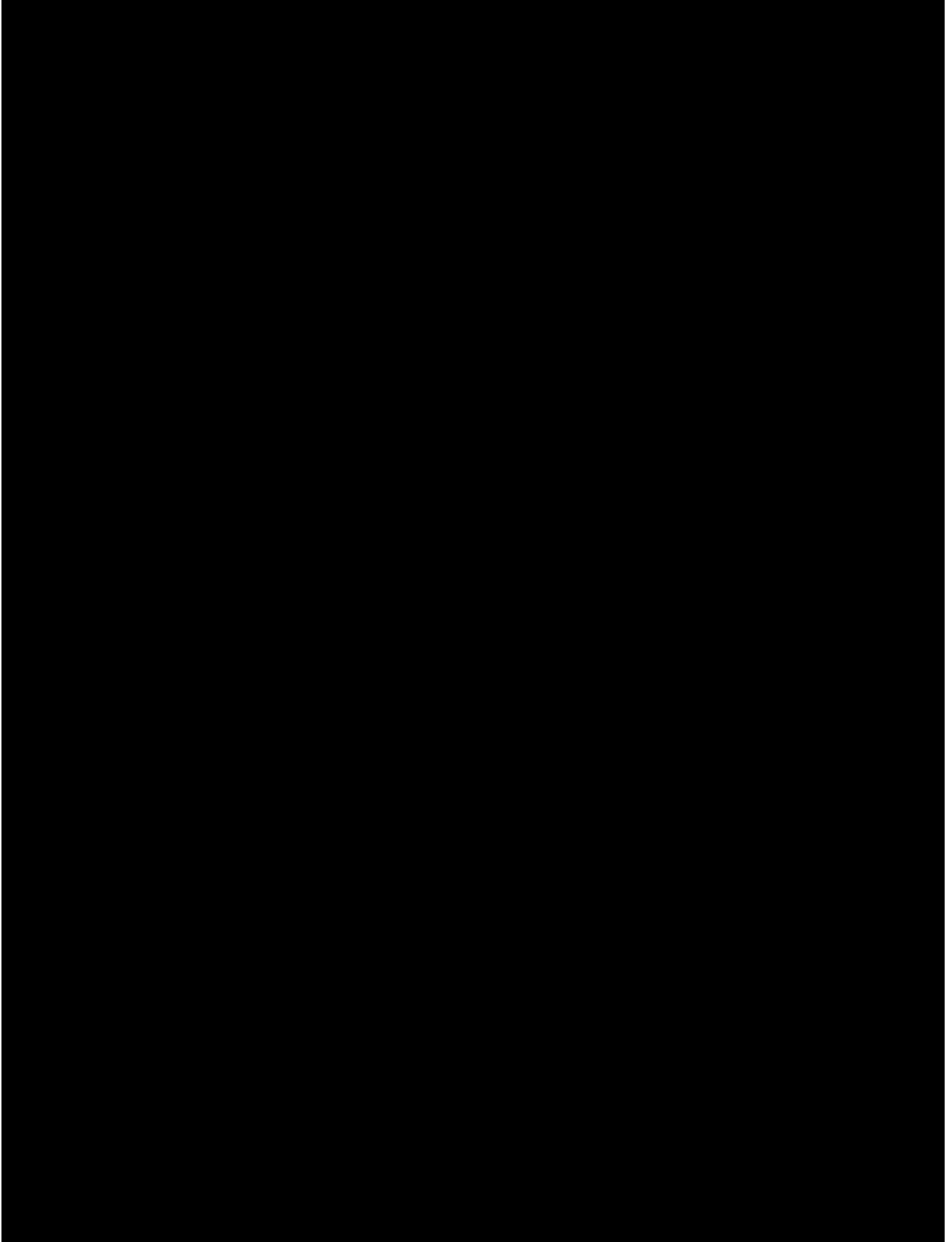
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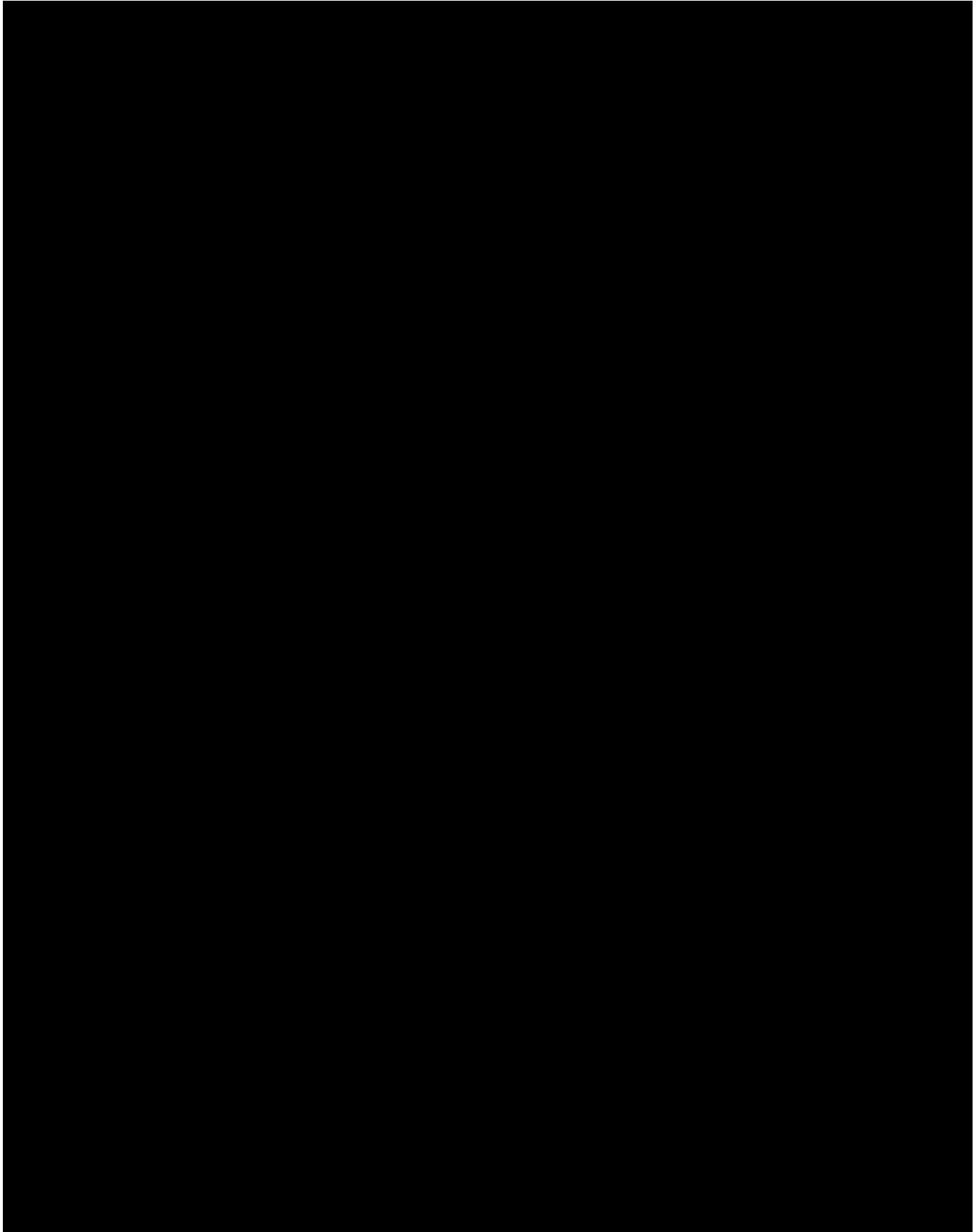
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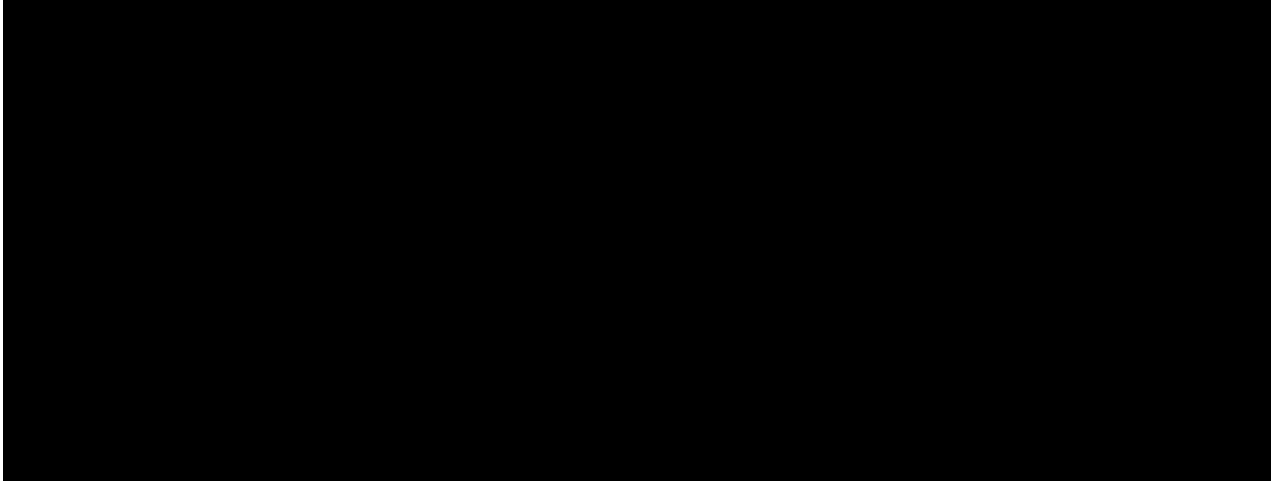
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D. Conclusion

For the reasons stated above, we recommend that the Commission reject Respondents' counteroffer dated October 24, 2024.



III. RECOMMENDATION

1. Reject Respondents' redlined counteroffer dated October 24, 2024.

