



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**MEMORANDUM**

**TO:** The Commission

**FROM:** Lisa J. Stevenson  
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Charles Kitcher  
Associate General Counsel for Enforcement

Peter G. Blumberg  
Acting Deputy Associate General Counsel for Enforcement

**BY:** Anne B. Robinson *ABR*  
Acting Assistant General Counsel

Justine A. di Giovanni *JAG*  
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**SUBJECT:** MUR 7763 (Casper for Colorado, *et al.*)

**RE:** Amend Certification to Include Current Treasurer

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On December 14, 2021, the Commission decided by a vote of 6-0 to find reason to believe that Casper Wesley Stockham and Casper for Colorado and Matt Arnold in his official capacity as treasurer violated 52 U.S.C. § 30114(b) by converting campaign funds to personal use and Casper for Colorado and Matt Arnold in his official capacity as treasurer violated 52 U.S.C. § 30104(b)(6) and 11 C.F.R. § 104.3(b) by failing to accurately report disbursements.<sup>1</sup> The Commission further voted to enter into pre-probable cause conciliation with Casper Wesley Stockham and Casper for Colorado and Matt Arnold in his official capacity as treasurer, approve the Factual & Legal Analyses as circulated by the Commissioners' offices, and approve the Conciliation Agreement.<sup>2</sup>

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<sup>1</sup> Certification ¶ 2.a-b (Dec. 19, 2021).

<sup>2</sup> *Id.* ¶ 2.c-e (approving Factual and Legal Analyses subject to the edits as to Casper for Colorado and Matt Arnold in his official capacity as treasurer as last circulated by the Democratic Commissioners' offices on December 9, 2021 at 3:58 p.m. and subject to edits as to Casper Wesley Stockham as last circulated by Commissioner Cooksey's office on November 15, 2021 at 2:12 p.m.).

While preparing the reason to believe notification letter in this case, we discovered that Casper for Colorado changed its treasurer from Matt Arnold to Casper Stockham.<sup>3</sup> The treasurer change occurred subsequent to the circulation of the First General Counsel's Report in this matter but before the Commission's vote and the Office of the Commission Secretary's certification of that vote. Thus, we recommend that the Commission take the following actions:

- Rescind the Commission's certification in MUR 7763;
- Authorize the Office of the Commission Secretary to correct and reissue the certification in MUR 7763 to list Casper Stockham as treasurer of Casper for Colorado; and
- Authorize the Office of General Counsel to make conforming edits to the Factual and Legal Analyses and Conciliation Agreement to list Casper Stockham as treasurer of Casper for Colorado.

### **RECOMMENDATIONS**

1. Rescind the Commission's certification in MUR 7763 finding reason to believe as to Matt Arnold in his official capacity as treasurer of Casper for Colorado;
2. Amend the Commission's certification in MUR 7763 to reflect that Casper Stockham is the treasurer of Casper for Colorado; and
3. Authorize the Office of General Counsel to make conforming edits to the Factual and Legal Analyses and Conciliation Agreement to reflect that Casper Stockham is the treasurer of Casper for Colorado.

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<sup>3</sup> Casper for Colorado, Amended Statement of Organization at 1 (Sept. 2, 2021), <https://docquery.fec.gov/pdf/009/202109029466600009/202109029466600009.pdf>.