



**FEDERAL ELECTION COMMISSION**

1 **MEMORANDUM**

2  
3 **TO:** The Commission

4  
5 **FROM:** Lisa J. Stevenson  
6 Acting General Counsel

7  
8 Charles Kitcher  
9 Acting Associate General Counsel for Enforcement

10  
11 Stephen Gura  
12 Deputy Associate General Counsel for Enforcement

13  
14 **DATE:** June 23, 2021

15  
16 **BY:** CJ Pavia *CP*  
17 Acting Assistant General Counsel

18  
19 Justine A. di Giovanni *JAG*  
20 Attorney

21  
22 **SUBJECT:** MUR 7877 (Tennessee Democratic Party) Pre-Probable Cause Conciliation  
23

---

24  
25 On January 28, 2021, the Commission found reason to believe that the Tennessee  
26 Democratic Party and Carol V. Abney in her official capacity as treasurer ("TDP") violated  
27 52 U.S.C. § 30104(b)(2), (4) by failing to report total receipts and disbursements; 52 U.S.C.  
28 § 30104(b)(3)(A) and 11 C.F.R. § 102.17(c)(8)(i)(B) by failing to itemize receipts received via  
29 joint fundraising transfers; and 11 C.F.R. § 106.7(d)(1) by failing to maintain monthly payroll  
30 logs.<sup>1</sup> The Commission authorized the Office of General Counsel to engage in pre-probable  
31 cause conciliation with TDP  
32

33 Attached is a negotiated conciliation agreement that has been signed by counsel for TDP  
34  
35  
36

---

<sup>1</sup> Certification ¶ 2.b-d (Feb. 10, 2021).

MUR 7877 (Tennessee Democratic Party)

Memorandum to the Commission

Page 2 of 3

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

MUR 7877 (Tennessee Democratic Party)

Memorandum to the Commission

Page 3 of 3

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19

We therefore recommend that the Commission accept the signed conciliation agreement with the respondent and close the file.

**RECOMMENDATIONS:**

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