



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

Stuart A. Sears  
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March 17, 2021

RE: MUR 7878  
Michelle Koury

Dear Mr. Sears,

On March 12, 2021, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 52 U.S.C. § 30122, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed 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). Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. *See* 52 U.S.C. § 30109(a)(4)(B).

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 694-1574 or [jdigiovanni@fec.gov](mailto:jdigiovanni@fec.gov).

Sincerely,

A handwritten signature in black ink that reads "Justine A. di Giovanni".

Justine A. di Giovanni  
Attorney, Federal Election Commission

Enclosure:  
Conciliation Agreement

1 **BEFORE THE FEDERAL ELECTION COMMISSION**

2  
3 In the Matter of )  
4 ) MUR 7878  
5 Michelle Koury )  
6 )

7 **CONCILIATION AGREEMENT**

8 This matter was initiated by a *sua sponte* submission (the “Submission”) made to the  
9 Federal Election Commission (the “FEC” or “Commission”) by Crystal Run Healthcare, LLP  
10 (“Crystal Run”). The Commission found reason to believe that Michelle Koury (“Respondent”)   
11 violated 52 U.S.C. § 30122 of the Federal Election Campaign Act of 1971, as amended (the  
12 “Act”).

13 NOW, THEREFORE, the Commission and Respondent, having participated in informal  
14 methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as  
15 follows:

16 I. The Commission has jurisdiction over Respondent and the subject matter of this  
17 proceeding, and this Agreement has the effect of an agreement entered pursuant to 52 U.S.C.  
18 § 30109(a)(4)(A)(i).

19 II. Respondent has had a reasonable opportunity to demonstrate that no action should  
20 be taken in this matter.

21 III. Respondent enters voluntarily into this Agreement with the Commission.

22 IV. The pertinent facts and legal provisions in this matter are as follows:

23 Applicable Law

24 1. The Act prohibits any person from making a contribution in the name of another  
25 or knowingly permitting his or her name to be used to effect such a contribution. 52 U.S.C.  
26 § 30122; *see also* 11 C.F.R. § 110.4(b)(1)(i)-(ii). The term “person,” for purposes of the Act and

Commission regulations, includes partnerships, corporations, and other organizations, including partnerships. 52 U.S.C. § 30101(11); *see also* 11 C.F.R. § 110.10.

### Facts

3. Crystal Run is a multi-specialty physician partnership that has operated in the Hudson Valley and lower Catskill region of New York State since 1996. Michelle Koury is its Chief Operating Officer.

4. In 2010, Crystal Run began reimbursing its doctors' contributions to federal political candidates that Koury and other executives determined to be beneficial to Crystal Run. Between September 22, 2010, and September 6, 2016, Crystal Run reimbursed thirty-eight contributions made by seventeen doctors and one doctor's spouse totaling \$46,500. \$12,000 was reimbursed to Koury.

5. Crystal Run became aware that its practice of reimbursing federal campaign contributions was unlawful in December 2017. On March 8, 2018, Crystal Run filed its Initial Submission with the Commission.

V. Respondent violated 52 U.S.C. § 30122 by permitting her name to be used for contributions made by Crystal Run.

VI. Respondent will take the following actions:

1. Pay a civil penalty to the Commission in the amount of one thousand dollars (\$1,000), pursuant to 52 U.S.C. § 30109(a)(5)(A).

2. Cease and desist from violating 52 U.S.C. § 30122.

3. Waive the right to any refund from the recipient committees of any and all of its contributions referenced in this Agreement, and request that the recipient committees disgorge to the United States Treasury all such contributions.

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VII. The Commission, on request of anyone filing a complaint under 52 U.S.C. § 30109(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This Agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire Agreement.

IX. Respondent shall have no more than thirty (30) days from the date this Agreement becomes effective to comply with and implement the requirements contained in this Agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written Agreement shall be enforceable.

FOR THE COMMISSION:

Lisa J. Stevenson  
Acting General Counsel

BY: Charles Kitcher  
Charles Kitcher  
Acting Associate General Counsel for Enforcement

3/16/21  
Date

FOR THE RESPONDENT:

Stuart A. Sears  
Attorney for Michelle Koury

2/17/21  
Date