



FEDERAL ELECTION COMMISSION  
Washington, DC

**TO:** The Commission

**FROM:** Lisa Stevenson  
Acting General Counsel

Charles Kitcher  
Associate General Counsel for Enforcement

**BY:** Adrienne Baranowicz *acb*  
Deputy Associate General Counsel  
for Enforcement

Dominique Dillenseger *DD*  
Attorney

**DATE:** September 19, 2024

**SUBJECT:** MUR 7892 (Turning Point Action)  
Recommendation to Accept Pre-Probable Cause Conciliation Agreement

---

On May 1, 2024, the Commission found reason to believe that Turning Point Action (“TPA”) violated 52 U.S.C. § 30104(b)(3)(A), (c)(1), and (c)(2)(C), by failing to disclose contributions totaling \$33,795, and directed the Office of General Counsel (“OGC”) to prepare a Conciliation Agreement for Commission approval.<sup>1</sup> On June 25, 2024, the Commission approved the Conciliation Agreement with TPA.<sup>2</sup> Attached is a negotiated conciliation agreement signed by Respondent<sup>3</sup> and a redlined version as compared to the agreement originally approved by the Commission.<sup>4</sup> We recommend that the Commission accept the signed agreement.

---

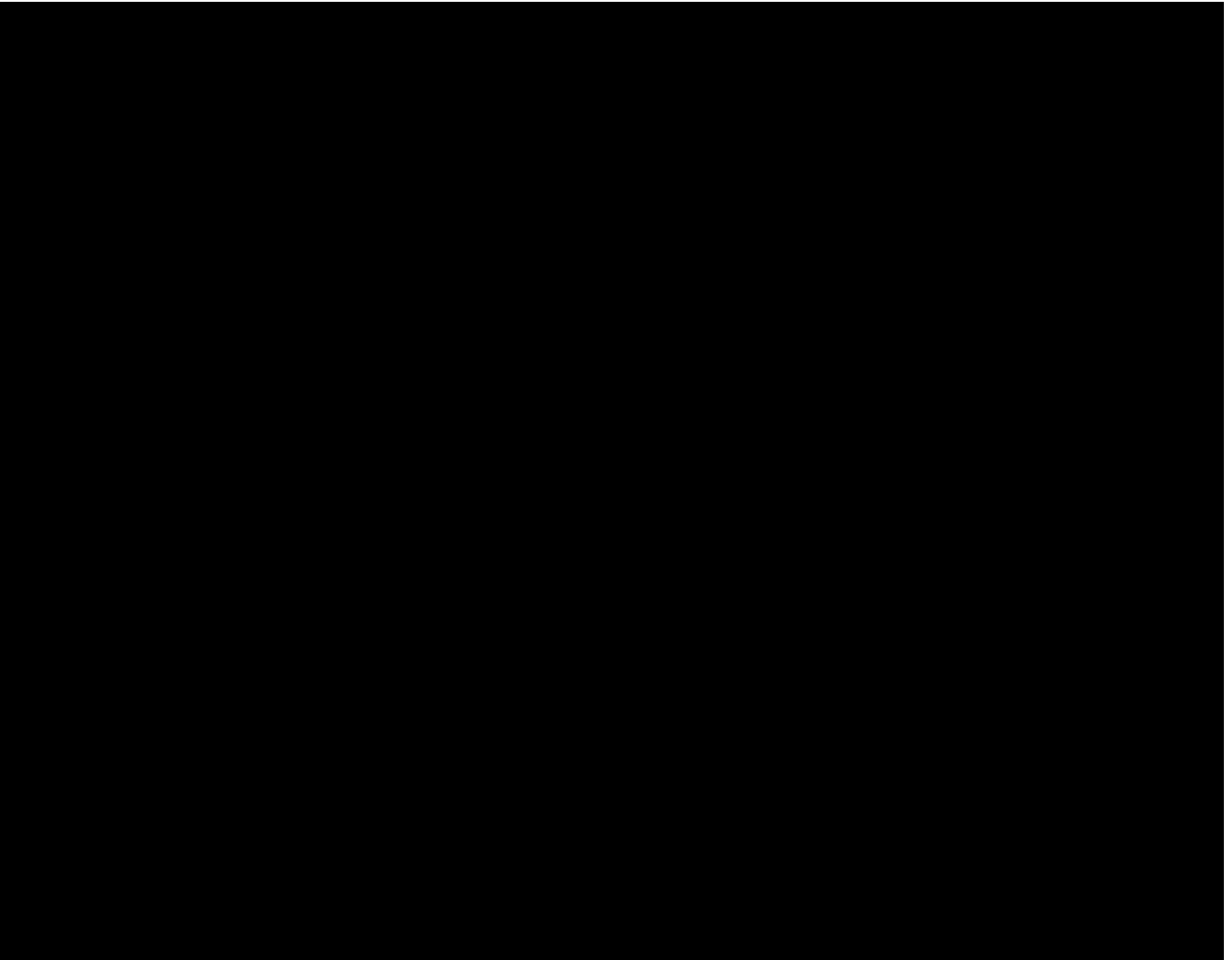
<sup>1</sup> Certification (“Cert.”) ¶¶ 1.a (May 2, 2024).

<sup>2</sup> Cert. ¶ 3 (July 2, 2024).

<sup>3</sup> Attach. 1.

<sup>4</sup> Attach. 2.

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  
27  
  
28



29           We believe that the settlement represents an acceptable resolution of this matter.  
30   Therefore, we recommend that the Commission accept the signed conciliation agreement.

31   **RECOMMENDATIONS:**

- 32           1.   Accept the attached conciliation agreement with Turning Point Action.
- 33           2.   Approve the appropriate letter; and
- 34           3.   Close the file effective 30 days from the date the certification of this vote is signed (or  
35               on the next business day after the 30th day, if the 30th day falls on a weekend or  
36               holiday).

37  
38  
39  
40

