



FEDERAL ELECTION COMMISSION
Washington, DC 20463

June 17, 2021

VIA ELECTRONIC MAIL

Graham M. Wilson
Perkins Coie
700 13th Street, NW
Suite 600
Washington, DC 20005-3960
(202) 654-6200
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RE: MUR 7895

Dear Mr. Wilson:

On June 14, 2021, the Federal Election Commission (“Commission”) accepted the signed conciliation agreement submitted on behalf of your client, DNC Services Corp./Dem. Nat’l Committee and Virginia McGregor in her official capacity as treasurer, of violations of 52 U.S.C. § 30104(b)(8) of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. §§ 104.3(d) and 104.11(a)-(b) of the Commission’s regulations. 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) 694-1476.

Sincerely,

A handwritten signature in black ink, appearing to read "Aaron Rabinowitz".

Aaron Rabinowitz
Attorney

BEFORE THE FEDERAL ELECTION COMMISSION

In the matter of)	
)	MUR 7895
DNC Services Corp./Dem. Nat'l)	
Committee and Virginia)	
McGregor in her official)	
capacity as treasurer)	

CONCILIATION AGREEMENT

This matter was initiated pursuant to information ascertained by the Federal Election Commission ("Commission") in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that DNC Services Corp./Dem. Nat'l Committee and Virginia McGregor in her official capacity as treasurer ("Respondent" or "Committee") violated 52 U.S.C. § 30104(b)(8) and 11 C.F.R. §§ 104.3(d), 104.11(a), and 104.11(b).

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

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

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

III. Respondent enters voluntarily into this agreement with the Commission.

IV. The pertinent facts and law in this matter are as follows:

Facts

1. The Committee is the national committee for the Democratic Party, initially having registered with the Commission on March 10, 1975.
2. Virginia McGregor is the treasurer of the Committee.
3. On January 30, 2018, the Committee filed its 2017 Year-End Report disclosing \$6,107,821.95 in outstanding debts and obligations. On September 10, 2018, the Committee filed a Second Amended 2017 Year-End Report that disclosed additional debts, resulting in the disclosure of \$1,406,549.70 in outstanding debts not previously disclosed.

Applicable Law

4. The Federal Election Campaign Act of 1971, as amended (the "Act"), requires committee treasurers to file reports disclosing the amount and nature of outstanding debts and obligations owed in accordance with the provisions of 52 U.S.C. § 30104. 52 U.S.C. § 30104(b)(8); 11 C.F.R. § 104.3(d). Committees must report debts and obligations over \$500 as of the date they are incurred and must continuously report such debt until extinguished. 52 U.S.C. § 30104(b); 11 C.F.R. §§ 104.11(a), 104.11(b).

V. Respondent violated 52 U.S.C. § 30104(b)(8) and 11 C.F.R. §§ 104.3(d), 104.11(a), and 104.11(b) by failing to report \$1,406,549.70 in outstanding debts on its 2017 Year-End Report.

VI. Respondent will take the following actions:

1. Respondent will pay a civil penalty to the Commission in the amount of Twenty One Thousand Six Hundred Dollars (\$21,600), pursuant to 52 U.S.C. § 30109(a)(5)(A).

2. Respondent will cease and desist from committing violations of 52 U.S.C. § 30104(b)(8) and 11 C.F.R. §§ 104.3(d), 104.11(a), and 104.11(b).

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 the same and the Commission has approved the entire agreement.

IX. Respondent shall have no more than 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 within this written agreement shall be enforceable.

MUR 7895 (DNC Services Corp.)
Conciliation Agreement
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FOR THE COMMISSION:

Lisa J. Stevenson
Acting General Counsel

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

6/17/21
Date

FOR THE RESPONDENT:

GRAHAM M. WILSON
Counsel to DNC Services Corp./
Democratic National Committee

May 14, 2021
Date