



FEDERAL ELECTION COMMISSION

Washington, D.C. 20463

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Charles Kitcher
Associate General Counsel for Enforcement

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Acting Deputy Associate General Counsel for Enforcement

BY: Saurav Ghosh SG by NB
Acting Assistant General Counsel

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Attorney

SUBJECT: MUR 7923 (Friends of David Schweikert, *et al.*)
Recommendation to Accept Signed Conciliation Agreements

On August 11, 2021, the Commission found reason to believe that (1) Friends of David Schweikert and Valerie Giramberg in her official capacity as treasurer (the “Schweikert Committee”) knowingly and willfully violated 52 U.S.C. § 30104(b)(5) and (b)(6) and 11 C.F.R. § 104.3(b)(3) and (b)(4) by misreporting the purpose of disbursements; (2) the Schweikert Committee knowingly and willfully violated 52 U.S.C. § 30104(b)(5) and (b)(6) by misreporting payees; (3) the Schweikert Committee knowing and willfully violated 52 U.S.C. § 30114(b) and 11 C.F.R. § 113.1(g) by converting campaign funds to personal use; and (4) Richard Oliver Schwab violated 52 U.S.C. § 30102(c)(5) by failing to maintain records.¹ The Commission also authorized the Office of General Counsel to engage in pre-probable cause conciliation with Respondents and approved a separate conciliation agreement for each Respondent.²

Attached are signed conciliation agreements for each Respondent

¹ Certification ¶ 2.b.–e. (Aug. 11, 2021).

² *Id.* ¶ 2.h.–i.

We believe the signed agreements vindicate the Commission's enforcement interests and would provide a satisfactory resolution of this matter. Accordingly, we recommend that the Commission accept the signed agreements and close the file.

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RECOMMENDATIONS:

1. Accept the signed conciliation agreement with Friends of David Schweikert and Valerie Giramberg in her official capacity as treasurer;
2. Accept the signed conciliation agreement with Richard Oliver Schwab;
3. Approve the appropriate letters; and
4. Close the file.