



THE FEDERAL ELECTION COMMISSION
Washington, DC 20463

January 26, 2022

To: The Commission

From: Lisa J. Stevenson
Acting General Counsel

Charles Kitcher
Associate General Counsel for Enforcement

Claudio Pavia
Acting Deputy Associate General Counsel for Enforcement

By: Mark Allen
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Re: MUR 7948 (Grassroots Victory PAC) – Pre-Probable Cause Conciliation

I. INTRODUCTION

On December 16, 2021, the Commission voted to open a MUR and found reason to believe that Grassroots Victory PAC and John Skic in his official capacity as treasurer (“GVP” or the “Committee”) violated 52 U.S.C. § 30104(b) by failing to accurately report disbursements.¹ The Commission authorized the Office of General Counsel to engage in pre-probable cause conciliation and approved a conciliation agreement.² Attached is a signed negotiated agreement which would resolve the matter. Also attached is a redlined version as compared to the opening offer approved by the Commission. We recommend that the Commission accept the attached negotiated agreement and close the file.

¹ Amended Certification (“Cert.”) ¶ 2.a-b, Audit Referral 19-14 (Dec. 21, 2021).

² *Id.* ¶ 2.d, e.

We believe that this agreement sufficiently vindicates the Commission's enforcement interests under the circumstances presented in this matter. Therefore, we recommend that the Commission accept the attached signed conciliation agreement with GVP, approve the appropriate letter, and close the file.

III. RECOMMENDATIONS

1. Accept the Conciliation Agreement with Grassroots Victory PAC and Heather Kashner in her official capacity as treasurer;
2. Approve the appropriate letter; and
3. Close the file.

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Memo to the Commission

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