



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

1 **MEMORANDUM**

February 6, 2025

2 **TO:** The Commission

3 **FROM:** Lisa J. Stevenson
4 Acting General Counsel

5 Claudio J. Pavia
6 Deputy Associate General Counsel for Enforcement

7 **BY:** Aaron Rabinowitz *AR*
8 Assistant General Counsel

9 Tiferet Unterman *TU*
10 Attorney

11 **SUBJECT:** MUR 7981 (The Freedom Forward Fund, *et al.*) Pre-Probable Cause Conciliation
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13 On February 27, 2024, the Commission found reason to believe that The Freedom
14 Forward Fund and Mike McCauley in his official capacity as treasurer (the “Committee”)
15 violated 52 U.S.C. § 30104(b) and 11 C.F.R. § 110.1(e) by failing to report attribution
16 information and that Teeter Jay, LLC violated 11 C.F.R. § 110.1(g)(5) by failing to provide
17 required attribution information, authorized the Office of General Counsel (“OGC”) to engage in
18 pre-probable cause conciliation with the Committee and Teeter Jay, and directed OGC to draft
19 Conciliation Agreements.¹ On January 16, 2025, the Commission approved the Agreements.²
20 Attached are Agreements signed by the Committee and Teeter Jay. There are no changes to
21 either Agreement from the versions approved by the Commission.

22 We believe this settlement represents an acceptable resolution of the matter. Therefore,
23 we recommend that the Commission accept the signed Conciliation Agreements with the
24 Committee and Teeter Jay and close the file.

1 Cert. ¶ 4 (Mar. 1, 2024).

2 Cert. ¶ 2 (Jan. 16, 2025).

MUR 7981 (The Freedom Forward Fund, *et al.*)

Memorandum to the Commission

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1 **RECOMMENDATIONS:**

- 2 1. Accept the attached signed Conciliation Agreements;
- 3 2. Approve the appropriate letters; and
- 4 3. Close the file effective 30 days from the date the certification of this vote is
- 5 signed (or on the next business day after the 30th day, if the 30th day falls on a
- 6 weekend or holiday).

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