



FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

1 **MEMORANDUM**

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3 **TO:** The Commission

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5 **FROM:** Lisa J. Stevenson
6 Acting General Counsel
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8 Charles Kitcher
9 Associate General Counsel for Enforcement
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11 Adrienne Baranowicz
12 Deputy Associate General Counsel for Enforcement
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14 **BY:** Ana Peña-Wallace *APW*
15 Assistant General Counsel
16
17 Christine C. Gallagher *CG*
18 Attorney
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20 **DATE:** September 19, 2023

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22 **SUBJECT:** MUR 8043 (Women Vote Smart)
23 Recommendation to Accept Signed Conciliation Agreement

24 The Commission previously found reason to believe that Women Vote Smart and Amy S.
25 Kremer in her official capacity as treasurer (the “Committee”) violated 52 U.S.C. § 30118(a) by
26 knowingly accepting \$37,575.74 in prohibited contributions.¹ At that time, the Commission
27 authorized pre-probable cause conciliation and approved a conciliation agreement
28 ² Attached is a negotiated conciliation agreement signed by
29 the Committee’s treasurer with a civil penalty of \$5,000 payable in two equal installments over
30 six months. We recommend that the Commission accept the negotiated agreement and close the
31 file.³

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¹ Certification ¶ 2 (July 29, 2022).

² *Id.* ¶¶ 4, 5; *see also* Commission-Approved Conciliation Agreement ¶ VI.1.

³ The statute of limitations in this matter begins to run on February 7, 2024, and ends June 30, 2024. Counsel declined all of our requests to toll the statute of limitations in exchange for extensions of time given to provide a response to the Commission’s reason-to-believe finding and a counterproposal. *See infra* note 6.

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1 conduct and the clarification of the public record seriously.²² We therefore recommend that the
2 Commission accept the signed conciliation agreement with the Committee. Finally, we
3 recommend that the Commission close the file in this matter.

4 **RECOMMENDATIONS:**

- 5 1. Accept the attached signed conciliation agreement;
- 6 2. Approve the appropriate letter; and
- 7 3. Close the file.

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²² The remedial measures in the agreement are likewise important should the treasurer continue to work with federal political committees. Notably, in addition to the Committee in this matter, Kremer was previously treasurer of her own campaign committee when she ran for Congress. *See* Friends to Elect Amy Kremer, Inc., Statement of Organization (Mar. 2, 2017).