

FEDERAL ELECTION COMMISSION
FIRST GENERAL COUNSEL’S REPORT

RAD REFERRAL 23L-40

DATE OF REFERRAL: August 10, 2023

DATE ACTIVATED: January 30, 2024

EXPIRATION OF SOL: March 20, 2028 –
April 20, 2028

ELECTION CYCLE: 2024

SOURCE:

Internally Generated

RESPONDENT:

Michigan Republican Party and Jennifer Standerfer
in her official capacity as treasurer

**RELEVANT STATUTES
AND REGULATIONS:**

52 U.S.C. § 30104(b)

11 C.F.R. § 104.1(a)

11 C.F.R. § 104.3(a), (b)

INTERNAL REPORTS CHECKED:

Disclosure Reports

FEDERAL AGENCIES CHECKED:

None

I. INTRODUCTION

The Reports Analysis Division (“RAD”) referred Michigan Republican Party and Jennifer Standerfer in her official capacity as treasurer (the “Committee”) for failure to disclose all receipts and disbursements in its 2023 March Monthly Report, in accordance with the 2023-2024 RAD Review and Referral Procedures (Standard 7).¹ According to the Referral, on April 20, 2023, the Committee filed an Amended 2023 March Monthly Report which disclosed receipts totaling \$166,162.80, an increase of \$164,016.80 from what had been reported in the original 2023 March Monthly Report, and additional disbursements totaling \$2,023,423.92, that

¹ Referral at 1 (Aug. 10, 2023).

had not been previously disclosed.² The Referral states that no corrective action is required at this time.³ The Committee has not submitted a response to the Referral.

Because there is no dispute as to whether the Committee failed to timely disclose all of its financial activity on its 2023 March Monthly Report, and further investigation is not necessary to establish the violation or its size, consistent with our recommendations in prior MURs, we recommend that the Commission find reason to believe that Michigan Republican Party and Jennifer Standerfer in her official capacity as treasurer violated 52 U.S.C. § 30104(b)(2) and (4) and enter into pre-probable cause conciliation.

II. FACTUAL AND LEGAL ANALYSIS

A. Background

The Michigan Republican Party is the state party committee for the Republican Party in Michigan.⁴ The Committee reported having three different treasurers from February 1-28, 2023, the time period covered by the 2023 March Monthly Report.⁵ The treasurer named in the Referral, Marcus Cairns, signed the 2023 March Monthly Report and served as treasurer from April 19, 2023, to September 6, 2023.⁶

² *Id.*

³ *Id.*

⁴ Michigan Republican Party, Amended Statement of Org. (Sept. 7, 2023), <https://docquery.fec.gov/pdf/707/202309079596998707/202309079596998707.pdf>.

⁵ Carl Meyers served as the Committee's treasurer from November 18, 2005, to February 12, 2023, Stuart Foster served from February 13, 2023, to February 17, 2023, and Matt Johnson served from February 18, 2023, to April 18, 2023. *See* Michigan Republican Party, Amended Statement of Org. (Nov. 18, 2005), <https://docquery.fec.gov/pdf/677/25971487677/25971487677.pdf>; Michigan Republican Party, Amended Statement of Org. (Feb. 13, 2023), <https://docquery.fec.gov/pdf/666/202302139578210666/202302139578210666.pdf>; Michigan Republican Party, Amended Statement of Org. (Feb. 18, 2023), <https://docquery.fec.gov/pdf/246/202302189578674246/202302189578674246.pdf>.

⁶ Referral at 1; Michigan Republican Party, Amended Statement of Org. (Apr. 19, 2023), <https://docquery.fec.gov/pdf/231/202304199581051231/202304199581051231.pdf>. The current treasurer, Jennifer Standerfer, became treasurer on September 7, 2023. *See* Michigan Republican Party, Amended Statement of Org. (Sept. 7, 2023), <https://docquery.fec.gov/pdf/707/202309079596998707/202309079596998707.pdf>.

The Referral alleges the Committee failed to disclose all of its financial activity on its 2023 March Monthly Report.⁷ On March 20, 2023, the Committee timely filed the original 2023 March Monthly Report (“Original Report”) covering the period of February 1-28, 2023, and disclosing a total of \$2,146 in receipts and no disbursements for the reporting period.⁸ Specifically, the Original Report disclosed receipts totaling \$865 on Line 11(a)(i) (Itemized Contributions from Individuals) and \$981 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals).⁹ It also disclosed \$300 in receipts on Line 11(b) (Contributions from Political Party Committees).¹⁰ The Original Report disclosed no receipts on Line 11(c) (Contributions From Other Political Committees), no receipts on Line 18(a) (Transfers from Non-Federal Account for Allocated Activity) of the Detailed Summary Page, and no disbursements on the Detailed Summary Page.¹¹

On April 20, 2023, the Committee filed two Amended 2023 March Monthly Reports approximately 1.5 hours apart.¹² The reports were identical but the first was signed by the former treasurer, Carl Meyers, and the second amended report was signed by the new treasurer Marcus Cairns.¹³ The Referral is based on the Second Amended 2023 March Monthly Report

⁷ Referral at 2.

⁸ Michigan Republican Party, 2023 March Monthly Report (Mar. 20, 2023), <https://docquery.fec.gov/pdf/305/202303209579436305/202303209579436305.pdf>.

⁹ *Id.*

¹⁰ *Id.*

¹¹ *Id.*

¹² See Michigan Republican Party, First Amended 2023 March Monthly Report (Apr. 20, 2023, 15:27 EST), <https://docquery.fec.gov/pdf/695/202304209581201695/202304209581201695.pdf> [hereinafter “First Amended Report”]; Michigan Republican Party, Second Amended 2023 March Monthly Report (Apr. 20, 2023, 17:03 EST), <https://docquery.fec.gov/pdf/926/202304209581216926/202304209581216926.pdf> [hereinafter “Second Amended Report”].

¹³ See First Amended Report; Second Amended Report. Although the Request for Additional Information (“RFAI”) does not specify whether it was sent in reference to the First or Second Amended Reports, the two

(“Second Amended Report”) because it is the most recent amended version of the report.■ The Second Amended Report disclosed an increase of \$164,016.80 in receipts and \$2,023,423.92 in disbursements from the original report.¹⁵

The receipts disclosed in the Second Amended Report, totaling \$166,162.80, were comprised of: \$6,668.10 on Line 11(a)(i) (Itemized Contributions from Individuals) (an increase of \$5,803.10), \$639.84 on Line 11(a)(ii) (Unitemized Contributions from Individuals) (a decrease of \$341.16), \$0 in receipts on Line 11(b) (Contributions from Political Party Committees) (a decrease of \$300).¹⁶ The report disclosed \$5,000 on Line 11(c) (Contributions From Other Political Committees) and \$153,854.86 on Line 18(a) (Transfers from Non-Federal Account for Allocated Activity), where the Committee had previously disclosed zero receipts.¹⁷

The additional disbursements disclosed in the Second Amended Report totaling \$2,023,423.92 were comprised of \$1,673.60 on Line 21(a)(i) (Allocated Federal / Non-Federal Activity (Federal Share)), \$9,483.71 on Line 21(a)(ii) (Allocated Federal / Non-Federal Activity (Non-Federal Share)), \$17,587.77 on Line 21(b) (Other Federal Operating Expenses), and \$1,994,678.84 on Line 22 (Transfers to Affiliated/Other Party Committees).¹⁸

amended reports are identical but for the treasurer's name and signature. The First Amended Report, filed on April 20, 2023, at 3:27 p.m., is signed by former treasurer Carl Meyers, and the Second Amended Report, filed at 5:03 p.m., is signed by Marcus Cairns, who became treasurer on April 19, 2023. *See* First Amended Report at 1; Second Amended Report at 1. There is no explanation provided as to why former treasurer Carl Meyers was signing disclosure reports after he had ceased being treasurer on February 13, 2023, according to the Amended Statement of Organization filed February 13, 2023, and Matt Johnson was treasurer, according to the Amended Statement of Organization filed February 18, 2023. *See supra* note 5 and accompanying text.

¹⁵ Referral at 1; Second Amended Report at 3; *see also* First Amended Report at 3.

¹⁶ Second Amended Report at 3; *see also* First Amended Report at 3.

¹⁷ Second Amended Report at 3; *see also* First Amended Report at 3.

¹⁸ Second Amended Report at 4; *see also* First Amended Report at 4.

The Second Amended Report includes a memo text entry stating:

This report is being amended to correct the original March Monthly Report filed on March 20, 2023. The original March Monthly Report was filed using the FEC free filing software with no previous or current committee data as the compliance and staff was undergoing an administrative transition. The committee has retained a professional compliance firm to ensure all activity is properly reported going forward.¹⁹

On June 1, 2023, an RFAI was sent to the Committee, referencing the “Amended 2023 March Monthly Report, received 04/20/2023.”²⁰ The RFAI requested clarification regarding the substantial increase in receipts and disbursements disclosed by the Committee.²¹ On July 6, 2023, the Committee filed an FEC Form 99 in response to the RFAI, restating what it had submitted in the memo text attached to the First and Second Amended Reports:

As stated in memo language in the Amended March Monthly Report, the original report was filed using the FEC free filing software. The individual filing the report did not have access to Aristotle, the Committee’s compliance software. This was due to a change in the administration of the Committee, a state party. The Committee wanted to be able to file a timely report, however, [it] did not have any transaction data available to them at that time to enter into the report. The Committee has since hired a compliance firm and the original report was amended as soon as all access was either restored or granted to the compliance software.²²

The Referral states that since July 10, 2023, RAD has logged one communication with the Committee’s Assistant Treasurer, Liz Curtis, during which she was informed of the possibility of referral to another Commission office for further review. ■ Ms. Curtis indicated

¹⁹ Second Amended Report at 6; *see also* First Amended Report at 6.

²⁰ Michigan Republican Party, RFAI (June 1, 2023), <https://docquery.fec.gov/pdf/979/202306010300182979/202306010300182979.pdf>. The RFAI was linked to the Second Amended Report. *See supra* note 14.

²¹ *Id.*

²² *Id.*

1 that the Committee had no additional information to provide at that time.■ The Committee did
 2 not respond to the Referral.

3 **B. Analysis**

4 The Act requires committee treasurers to file reports of receipts and disbursements in
 5 accordance with the provisions of 52 U.S.C. § 30104.²⁵ These reports must include, *inter alia*,
 6 the total amount of receipts and disbursements, including the appropriate itemizations, where
 7 required.²⁶

8 Though the Committee has not filed a response to the Referral, the Form 99 it filed on
 9 July 6, 2023, in response to the RFAI asserts that the reporting errors occurred due to a change in
 10 administration because “the individual filing the report did not have access to Aristotle, the
 11 Committee’s compliance software” and therefore “did not have any transaction data available to
 12 them at that time to enter into the [disclosure] report.”²⁷ The Committee does not explain why
 13 the new treasurer did not have access to the compliance software that was presumably in the
 14 Committee’s possession, or why it took one month to amend the disclosure report and provide
 15 the correct information. The Committee asserts that since the erroneous filing, it has “hired a
 16 compliance firm and the original report was amended as soon as all access was either restored or
 17 granted to the compliance software.”²⁸

18 In circumstances involving committees that made reporting errors by omitting receipts
 19 and disbursements, including where such errors may have been inadvertent, the Commission has

²⁵ 52 U.S.C. § 30104(a)(1); 11 C.F.R. § 104.1(a).

²⁶ 52 U.S.C. § 30104(b)(2), (4); 11 C.F.R. § 104.3(a), (b).

²⁷ Michigan Republican Party, FEC Form 99, (July 6, 2023),
<https://docquery.fec.gov/pdf/677/202307069582438677/202307069582438677.pdf>.

²⁸ *Id.*

1 consistently found reason to believe and engaged in pre-probable cause conciliation,
2 incorporating the self-reported nature of the reporting violations.²⁹ Because there is no dispute
3 that the Committee failed to accurately disclose the increase in receipts totaling \$164,016.80 and
4 disbursements totaling \$2,023,423.92 in its 2023 March Monthly Report, we recommend that the
5 Commission find reason to believe that the Michigan Republican Party and Jennifer Standerfer
6 in her official capacity as treasurer violated 52 U.S.C. § 30104(b)(2) and (4) and enter into pre-
7 probable cause conciliation.

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²⁹ See, e.g., Conciliation Agreement, MUR 8178 (Spencer Toder for Senate) (conciliating failure to timely and accurately report disbursements); Conciliation Agreement, MUR 8061 (Republican Party of Minnesota – Federal) (conciliating failure to timely and accurately report receipts and disbursements); Conciliation Agreement, MUR 8050 (Montana Democratic Party) (same).

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7 **V. RECOMMENDATIONS**

- 8 1. Open a Matter Under Review;
- 9 2. Find reason to believe that Michigan Republican Party and Jennifer Standerfer in
10 her official capacity as treasurer violated 52 U.S.C. § 30104(b)(2) and (4) by
11 failing to accurately disclose receipts and disbursements;
- 12 3. Enter into conciliation with Michigan Republican Party and Jennifer Standerfer in
13 her official capacity as treasurer prior to a finding of probable cause to believe;
- 14 4. Approve the attached Factual and Legal Analysis;
- 15 5. Approve the attached Conciliation Agreement; and

6. Approve the appropriate letter.

Lisa J. Stevenson
Acting General Counsel

Charles Kitcher
Associate General Counsel for Enforcement

5/24/2024

Date

Adrienne C. Baranowicz
Adrienne C. Baranowicz
Deputy Associate General Counsel
for Enforcement

A.B.R.
Anne B. Robinson
Assistant General Counsel

Camilla Jackson Jones
Camilla Jackson Jones
Attorney

Attachments:

1. Factual and Legal Analysis

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Michigan Republican Party and Jennifer Standerfer **MUR** _____
in her official capacity as treasurer

I. INTRODUCTION

The Reports Analysis Division (“RAD”) referred Michigan Republican Party and Jennifer Standerfer in her official capacity as treasurer (the “Committee”) for failure to disclose all receipts and disbursements in its 2023 March Monthly Report, in accordance with the 2023-2024 RAD Review and Referral Procedures (Standard 7).¹ According to the Referral, on April 20, 2023, the Committee filed an Amended 2023 March Monthly Report which disclosed receipts totaling \$166,162.80, an increase of \$164,016.80 from what had been reported in the original 2023 March Monthly Report, and additional disbursements totaling \$2,023,423.92, that had not been previously disclosed.² The Referral states that no corrective action is required at this time.³ The Committee has not submitted a response to the Referral.

Because there is no dispute as to whether the Committee failed to timely disclose all of its financial activity on its 2023 March Monthly Report, the Commission finds reason to believe that Michigan Republican Party and Jennifer Standerfer in her official capacity as treasurer violated 52 U.S.C. § 30104(b)(2) and (4).

¹ Referral at 1 (Aug. 10, 2023).

² *Id.*

³ *Id.*

II. FACTUAL AND LEGAL ANALYSIS

A. Background

The Michigan Republican Party is the state party committee for the Republican Party in Michigan.⁴ The Committee reported having three different treasurers from February 1-28, 2023, the time period covered by the 2023 March Monthly Report.⁵ The treasurer named in the Referral, Marcus Cairns, signed the 2023 March Monthly Report and served as treasurer from April 19, 2023, to September 6, 2023.⁶

The Referral alleges the Committee failed to disclose all of its financial activity on its 2023 March Monthly Report.⁷ On March 20, 2023, the Committee timely filed the original 2023 March Monthly Report (“Original Report”) covering the period of February 1-28, 2023, and disclosing a total of \$2,146 in receipts and no disbursements for the reporting period.⁸ Specifically, the Original Report disclosed receipts totaling \$865 on Line 11(a)(i) (Itemized Contributions from Individuals) and \$981 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals).⁹ It also disclosed \$300 in receipts on Line 11(b) (Contributions

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⁵ Carl Meyers served as the Committee’s treasurer from November 18, 2005, to February 12, 2023, Stuart Foster served from February 13, 2023, to February 17, 2023, and Matt Johnson served from February 18, 2023, to April 18, 2023. *See* Michigan Republican Party, Amended Statement of Org. (Nov. 18, 2005), <https://docquery.fec.gov/pdf/677/25971487677/25971487677.pdf>; Michigan Republican Party, Amended Statement of Org. (Feb. 13, 2023), <https://docquery.fec.gov/pdf/666/202302139578210666/202302139578210666.pdf>; Michigan Republican Party, Amended Statement of Org. (Feb. 18, 2023), <https://docquery.fec.gov/pdf/246/202302189578674246/202302189578674246.pdf>.

⁶ Referral at 1; Michigan Republican Party, Amended Statement of Org. (Apr. 19, 2023), <https://docquery.fec.gov/pdf/231/202304199581051231/202304199581051231.pdf>. The current treasurer, Jennifer Standerfer, became treasurer on September 7, 2023. *See* Michigan Republican Party, Amended Statement of Org. (Sept. 7, 2023), <https://docquery.fec.gov/pdf/707/202309079596998707/202309079596998707.pdf>.

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⁸ Michigan Republican Party, 2023 March Monthly Report (Mar. 20, 2023), <https://docquery.fec.gov/pdf/305/202303209579436305/202303209579436305.pdf>.

⁹ *Id.*

from Political Party Committees).¹⁰ The Original Report disclosed no receipts on Line 11(c) (Contributions From Other Political Committees), no receipts on Line 18(a) (Transfers from Non-Federal Account for Allocated Activity) of the Detailed Summary Page, and no disbursements on the Detailed Summary Page.¹¹

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¹⁴ Referral at 1; Second Amended Report at 3; see also First Amended Report at 3.

decrease of \$341.16), \$0 in receipts on Line 11(b) (Contributions from Political Party Committees) (a decrease of \$300).¹⁵ The report disclosed \$5,000 on Line 11(c) (Contributions From Other Political Committees) and \$153,854.86 on Line 18(a) (Transfers from Non-Federal Account for Allocated Activity), where the Committee had previously disclosed zero receipts.¹⁶

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On June 1, 2023, an RFAI was sent to the Committee, referencing the “Amended 2023 March Monthly Report, received 04/20/2023.”¹⁹ The RFAI requested clarification regarding the substantial increase in receipts and disbursements disclosed by the Committee.²⁰ On July 6,

¹⁵ Second Amended Report at 3; *see also* First Amended Report at 3.

¹⁶ Second Amended Report at 3; *see also* First Amended Report at 3.

¹⁷ Second Amended Report at 4; *see also* First Amended Report at 4.

¹⁸ Second Amended Report at 6; *see also* First Amended Report at 6.

¹⁹ Michigan Republican Party, RFAI (June 1, 2023), <https://docquery.fec.gov/pdf/979/202306010300182979/202306010300182979.pdf>. The RFAI was linked to the Second Amended Report.

²⁰ *Id.*

2023, the Committee filed an FEC Form 99 in response to the RFAI, restating what it had submitted in the memo text attached to the First and Second Amended Reports:

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The Referral states that since July 10, 2023, RAD has logged one communication with the Committee's Assistant Treasurer, Liz Curtis, during which she was informed of the possibility of referral to another Commission office for further review.²² Ms. Curtis indicated that the Committee had no additional information to provide at that time.²³ The Committee did not respond to the Referral.

B. Analysis

The Act requires committee treasurers to file reports of receipts and disbursements in accordance with the provisions of 52 U.S.C. § 30104.²⁴ These reports must include, *inter alia*, the total amount of receipts and disbursements, including the appropriate itemizations, where required.²⁵

Though the Committee has not filed a response to the Referral, the Form 99 it filed on July 6, 2023, in response to the RFAI asserts that the reporting errors occurred due to a change in

²¹ *Id.*

²² Referral at 3.

²³ *Id.*

²⁴ 52 U.S.C. § 30104(a)(1); 11 C.F.R. § 104.1(a).

²⁵ 52 U.S.C. § 30104(b)(2), (4); 11 C.F.R. § 104.3(a), (b).

administration because “the individual filing the report did not have access to Aristotle, the Committee’s compliance software” and therefore “did not have any transaction data available to them at that time to enter into the [disclosure] report.”²⁶ The Committee does not explain why the new treasurer did not have access to the compliance software that was presumably in the Committee’s possession, or why it took one month to amend the disclosure report and provide the correct information. The Committee asserts that since the erroneous filing, it has “hired a compliance firm and the original report was amended as soon as all access was either restored or granted to the compliance software.”²⁷

In circumstances involving committees that made reporting errors by omitting receipts and disbursements, including where such errors may have been inadvertent, the Commission has consistently found reason to believe and engaged in pre-probable cause conciliation, incorporating the self-reported nature of the reporting violations.²⁸ Because there is no dispute that the Committee failed to accurately disclose the increase in receipts totaling \$164,016.80 and disbursements totaling \$2,023,423.92 in its 2023 March Monthly Report, the Commission finds reason to believe that the Michigan Republican Party and Jennifer Standerfer in her official capacity as treasurer violated 52 U.S.C. § 30104(b)(2) and (4).

²⁶ Michigan Republican Party, FEC Form 99, (July 6, 2023), <https://docquery.fec.gov/pdf/677/202307069582438677/202307069582438677.pdf>.

²⁷ *Id.*

²⁸ *See, e.g.*, Conciliation Agreement, MUR 8178 (Spencer Toder for Senate) (conciliating failure to timely and accurately report disbursements); Conciliation Agreement, MUR 8061 (Republican Party of Minnesota – Federal) (conciliating failure to timely and accurately report receipts and disbursements); Conciliation Agreement, MUR 8050 (Montana Democratic Party) (same).