



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Gould for Congress) MUR 6624
)
)

**STATEMENT OF REASONS OF
VICE CHAIR CAROLINE C. HUNTER AND
COMMISSIONERS LEE E. GOODMAN AND MATTHEW S. PETERSEN¹**

In this matter, we voted to find reason to believe that respondent violated the Act and to accept a conciliation agreement between the Commission and respondent. We did not, however, agree with all of the Office of General Counsel's recommendations. Specifically, we disagreed that there was reason to believe that respondent transferred funds from his state campaign committee to a federal committee. In response to the allegation that his state campaign committee paid for federal testing-the-waters activities, the respondent asserted that the payment represented the balance due for state-level services that were provided earlier in 2011, and we credited that explanation.

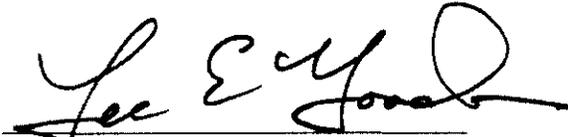
¹ We further note that although we present this clarification of our position in this matter, statements of reasons in these circumstances likely are not required by the Act. Section 30109(8)(A) gives "[a]ny party aggrieved by an order of the Commission dismissing a complaint" a cause of action to challenge the Commission's action. However, this Complaint was not dismissed: The Commission received a complaint, made a reason-to-believe finding, and conciliated with respondent.



Caroline C. Hunter
Vice Chair

2/16/17

Date



Lee E. Goodman
Commissioner

Feb. 16, 2017

Date



Matthew S. Petersen
Commissioner

FEB. 16, 2017

Date