



**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 Kathleen M. Guith  
9 Associate General Counsel for Enforcement

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11 **BY:** Mark D. Shonkwiler *MS*  
12 Assistant General Counsel

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14 Christopher Edwards  
15 Attorney

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17 **SUBJECT: MUR 7122 (Right to Rise USA) – Pre-Probable Cause Conciliation Agreement**

18 On October 11, 2018, the Commission found reason to believe that Right to Rise USA  
19 and Charles Spies in his official capacity as treasurer violated 52 U.S.C. § 30121(a)(2) and  
20 11 C.F.R. § 110.20(g) in connection with soliciting and accepting \$1.3 million in contributions  
21 from American Pacific International Capital, Inc. ("APIC") that were directed by foreign  
22 nationals.<sup>1</sup> The Commission authorized pre-probable cause conciliation and approved a  
23 conciliation agreement <sup>2</sup>

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<sup>1</sup> Amend. Certification, MUR 7122 (Oct. 17, 2018).

<sup>2</sup> *Id.*

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Thus, we recommend that the Commission accept the negotiated conciliation agreement and close the file.<sup>10</sup>

**RECOMMENDATIONS:**

1. Accept the attached conciliation agreement with Right to Rise USA and Charles Spies, in his official capacity as treasurer;

<sup>10</sup> The Commission previously accepted a separate conciliation agreement with APIC, its foreign national board members, and its Executive Director. Certification, MUR 7122 (Dec. 14, 2018). At that time, these Respondents were notified that the file had been closed as to them, but remained open with regard to other parties.

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2. Approve the appropriate letters; and
3. Close the file.

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