



THE FEDERAL ELECTION COMMISSION
Washington, DC 20002

September 5, 2023

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2 **MEMORANDUM**

3 **TO:** The Commission

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

6 Charles Kitcher
7 Associate General Counsel for Enforcement

8 **BY:** Claudio J. Pavia
9 Deputy Associate General Counsel for Enforcement

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11 Aaron Rabinowitz
12 Assistant General Counsel

13 Dominique Dillenseger *DD*
14 Attorney

15 **SUBJECT:** MUR 7678 (Keisha Carter) — Pre-Probable Cause Conciliation Agreement

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18 On August 30, 2023, the Commission voted to find reason to believe that Keisha Carter
19 in her personal capacity knowingly and willfully violated 52 U.S.C. § 30102(h)(1) and 11 C.F.R.
20 § 103.3 by failing to deposit receipts in or make disbursements from an account at a properly
21 designated campaign depository and knowingly and willfully violated 52 U.S.C. § 30102(b)(3)
22 and 11 C.F.R § 102.15. by failing to keep campaign funds segregated from the personal funds of
23 any individual.¹ The Commission further approved the Factual and Legal Analysis, authorized
24 conciliation prior to a finding of probable cause to believe and directed the Office of General
25 Counsel to draft a Conciliation Agreement that includes a knowing and willful finding and
26 admission of the Commission's reason to believe finding with an appropriately calculated
27 penalty based on the knowing and willful finding, and to circulate the draft agreement on tally.²

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¹ Certification ¶ 1 (Sept. 1, 2023), MUR 7678 (Keisha Carter, et al.).

² *Id.* ¶¶ 2-4.

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