

**FEDERAL ELECTION COMMISSION**

Washington, DC

January 18, 2024

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Charles Kitcher
Associate General Counsel for Enforcement

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

Aaron Rabinowitz *AR*
Assistant General Counsel for Enforcement

Dominique Dillenseger *DD*
Attorney

RE: MUR 7678 (Keisha Carter) Proposed Conciliation Agreement for Probable Cause Conciliation

Attached is a proposed conciliation agreement for probable cause conciliation with Keisha Carter. The proposed agreement is for the Commission's consideration along with the Office of General Counsel's Notice to the Commission Following the Submission of Probable Cause Brief in MUR 7678 ("OGC Notice") which is being submitted to the Commission simultaneously with this Memorandum. The OGC Notice informs the Commission that this Office intends to proceed with the recommendation that the Commission find probable cause to believe that Keisha Carter in her personal capacity knowingly and willfully violated 52 U.S.C. § 30102(h)(1) and 11 C.F.R. § 103.3 by failing to deposit receipts in or make disbursements from an account at a properly designated campaign depository, and knowingly and willfully violated 52 U.S.C. § 30102(b)(3) and 11 C.F.R. § 102.15 by failing to keep campaign funds segregated from the personal funds of any individual.

MUR 7678 (Keisha Carter)

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We recommend that the Commission approve the attached conciliation agreement.

RECOMMENDATIONS

1. Approve the attached conciliation agreement.
2. Approve the appropriate letter.

