



FEDERAL ELECTION COMMISSION
Washington, DC

SENSITIVE

December 4, 2023

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Charles Kitcher
Associate General Counsel for Enforcement

Adrienne Baranowicz
Deputy Associate General Counsel for Enforcement

BY: Mark Allen
Assistant General Counsel

Wanda D. Brown *wdb*
Assistant General Counsel

SUBJECT: MUR 7982 (LUPE Votes)
Recommendation to Accept Signed Conciliation Agreement

On October 17, 2023, the Commission found reason to believe that LUPE Votes violated 52 U.S.C. §§ 30104(g) and 30120(a) and 11 C.F.R. §§ 104.4(b) and (c) and 110.11 by failing to timely file 24- and 48-hour Reports of Independent Expenditures and failing to include sufficient disclaimers on communications.¹ The Commission authorized the Office of General Counsel to engage in pre-probable cause conciliation with LUPE Votes and approved a conciliation agreement.²

Attached is a conciliation agreement, signed by counsel, that would settle the violations in this matter.

¹ Certification ¶ 2.a-2.b (Oct. 18, 2023). The Commission also found no reason to believe that LUPE Votes made prohibited in-kind contributions in the form of coordinated communications. *Id.* ¶ 2.e.

² *Id.* ¶ 2.g.

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We recommend that the Commission accept the attached signed conciliation agreement and close the file in this matter.

RECOMMENDATIONS

1. Accept the signed conciliation agreement with LUPE Votes;
2. Approve the appropriate letters; and
3. Close the file.