



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

August 8, 2019

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Charles Kitcher
Acting Associate General Counsel

BY: Peter Blumberg *PGB*
Acting Deputy Associate General Counsel

Mark Shonkwiler *MS*
Assistant General Counsel

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Attorney

RE: MURs 6960 & 6991 (SW Technologies, LLC)
Pre-Probable Cause Conciliation

I. INTRODUCTION

On July 11, 2017, the Commission found reason to believe that SW Technologies, LLC d/b/a Advocacy Data ("SWT") violated 52 U.S.C. § 30111(a)(4) by compiling a commercial mailing list with the names and addresses of contributors obtained from Complainants' FEC disclosure reports and authorized the use of compulsory process.¹ Following an investigation, on June 25, 2019, the Commission decided to enter into pre-probable cause conciliation with SWT and approved a proposed conciliation agreement.²

¹ Certification ¶ 2(a), (d), MURs 6960 & 6991 (SWT, *et al.*) (July 12, 2017).

² Certification ¶¶ 1-2, MURs 6960 & 6991 (SWT, *et al.*) (June 26, 2019).

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Accordingly, we find the inclusion of this contention
language to be acceptable, especially given that SWT agreed to pay the full civil penalty amount.

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III. RECOMMENDATIONS

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1. Accept the signed conciliation agreement with SW Technologies, LLC;

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2. Approve the appropriate letter; and

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3. Close the file.

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