



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

**MEMORANDUM**

**TO:** The Commission

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

Charles Kitcher  
Acting Associate General Counsel for Enforcement

Stephen Gura  
Deputy Associate General Counsel for Enforcement

**BY:** Mark Shonkwiler *MS*  
Assistant General Counsel

Kristina M. Portner *KP*  
Attorney

**SUBJECT:** MUR 7767 (Hall for Congress)  
Pre-Probable Cause Conciliation Agreement

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On June 30, 2020, the Commission found reason to believe that Hall for Congress and David Gould in his official capacity as treasurer (the "Committee") violated 52 U.S.C. § 30106(f) by accepting excessive contributions and violated 11 C.F.R. § 102.9 by using general election contributions for primary election expenses.<sup>1</sup> The Commission authorized pre-probable cause conciliation with the Committee

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<sup>1</sup> Certification, AR 19-02 (July 29, 2020).

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17 Therefore, we recommend that the Commission  
18 accept the attached conciliation agreement and close the file in this matter.

19 **RECOMMENDATIONS:**

- 20 1. Accept the attached signed conciliation agreement with Hall for Congress  
21 and David Gould in his official capacity as treasurer;
- 22 2. Approve the appropriate letter; and
- 23 3. Close the file.

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