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By Office of the Commission Secretary at 3:33 pm, Oct 03, 2024



FEDERAL ELECTION COMMISSION
Washington, DC

SENSITIVE**MEMORANDUM**

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Claudio J. Pavia
Deputy Associate General Counsel for Enforcement

BY: Mark Allen *MA*
Assistant General Counsel

Dominique Dillenseger *DD*
Attorney

DATE: October 3, 2024

SUBJECT: MUR 8285 (Pat Dowell for Congress)
Pre-Probable Cause Conciliation Agreement

On July 9, 2024, the Commission found reason to believe that Pat Dowell for Congress and Mattie Lacy in her official capacity as treasurer (the “Committee”) violated: (1) 52 U.S.C. § 30116(f) and 11 C.F.R. § 110.9 by knowingly accepting excessive contributions during the 2022 primary election; (2) 52 U.S.C. § 30118(a) and 11 C.F.R. § 114.2(d) by knowingly accepting corporate contributions; (3) 11 C.F.R. § 103.3(b) by accepting contributions from unregistered organizations without ascertaining whether the underlying funds complied with the limitations and prohibitions of the Act; (4) 52 U.S.C. § 30116(f) and 11 C.F.R. § 102.9(e) by failing to timely remedy 2022 general election contributions; and (5) 52 U.S.C. § 30104(b)(1) and 11 C.F.R. § 104.3(a)(1) by failing to accurately report its cash-on-hand.¹ The Commission also voted to enter into pre-probable cause conciliation with the Committee.² Attached is a negotiated conciliation agreement with the Committee, signed by the Committee’s counsel, which would resolve the violations.³ We recommend that the Commission accept the signed

¹ Amended Certification ¶¶ 3-6 (July 15, 2024).

² *Id.* ¶ 8.

³ Attach. 1.

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[REDACTED]

⁴ Attach. 2.

[REDACTED]

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RECOMMENDATIONS:

1. Accept the attached conciliation agreement with Pat Dowell for Congress and Mattie Lacy in her official capacity as treasurer;
2. Approve the appropriate letter; and
3. Close the file effective 30 days after the date the certification of this vote is signed (or on the next business day after the 30th day, if the 30th day falls on a weekend or holiday).

[REDACTED]

[REDACTED]