



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

1 **MEMORANDUM**

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3 **TO:** The Commission

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

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8 Kathleen M. Guith  
9 Associate General Counsel for Enforcement

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11 Stephen Gura  
12 Deputy Associate General Counsel for Enforcement

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14 **BY:** Lynn Y. Tran *LNT*  
15 Assistant General Counsel

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17 Jonathan A. Peterson *JAP*  
18 Attorney

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20 **SUBJECT:** MUR 7411 (Mary Thomas for Congress) – Recommendation to Accept  
21 Signed Conciliation Agreement

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24 On June 7, 2018, the Commission found reason to believe that Mary Thomas for  
25 Congress and Roxane Nickeo in her official capacity as treasurer (the “Committee”) violated  
26 52 U.S.C. § 30116(f) by accepting \$2,150 in excessive primary election contributions and  
27 \$69,645.12 in general election contributions after the candidate lost the 2016 primary election.<sup>1</sup>  
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<sup>1</sup> Commission Certification at ¶ 3, (June 7, 2018); Factual & Legal Analysis at 4.

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We believe that the terms of the negotiated agreement are acceptable and represent a reasonable compromise under the circumstances. Therefore, we recommend that the Commission accept the attached conciliation agreement and close the file in this matter.

**RECOMMENDATIONS:**

1. Accept the attached conciliation agreement with Mary Thomas for Congress and Roxane Nickeo in her official capacity as treasurer;
2. Approve the appropriate letters; and
3. Close the file.