



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

**MEMORANDUM**

1  
2  
3  
4  
5 **TO:** The Commission  
6  
7 **FROM:** Lisa J. Stevenson LJS /by CK  
8 Acting General Counsel  
9  
10 Charles Kitcher CK  
11 Acting Associate General Counsel for Enforcement  
12  
13 Mark Shonkwiler MS  
14 Assistant General Counsel  
15  
16 Kimberly D. Hart KDH  
17 Staff Attorney  
18  
19 **DATE:** February 3, 2021  
20  
21 **SUBJECT:** MUR 7284 (AB PAC (formerly known as American Bridge 21<sup>st</sup> Century *et al*))  
22  
23 **RE:** Proposed Conciliation Agreement for Probable Cause Conciliation  
24

---

25  
26 Attached is a proposed conciliation agreement for probable cause conciliation with AB  
27 PAC (formerly known as American Bridge 21<sup>st</sup> Century) and Rodell Mollineau in his official  
28 capacity as treasurer ("AB PAC"). The proposed agreement is for the Commission's  
29 consideration along with the Office of General Counsel's Notice to the Commission Following  
30 the Submission of Probable Cause Brief in MUR 7284 ("OGC Notice"), which is being  
31 submitted to the Commission simultaneously with this Memorandum. The OGC Notice informs  
32 the Commission that this Office intends to proceed with the recommendation that the  
33 Commission find probable cause to believe that AB PAC violated 52 U.S.C. § 30104(b) by  
34 failing to report \$610,800 in debt to AB Foundation, failing to report the receipt of the  
35 contractual rights to a mailing list that AB Foundation leased for \$150,000, and misreporting the  
36 purpose of a portion of a \$400,000 payment that it received from Correct the Record as  
37 compensation for the contractual rights to the mailing list.<sup>1</sup>  
38

---

<sup>1</sup> See Certification, MUR 7284 (American Bridge 21<sup>st</sup> Century) (Apr. 25, 2019).

MUR 7284 (American Bridge 21<sup>st</sup> Century)  
Memorandum to Commission with Proposed  
Conciliation Agreement  
Page 2 of 2

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36

We recommend that the Commission approve the attached conciliation agreement.

**RECOMMENDATIONS**

1. Approve the attached conciliation agreement.
2. Approve the appropriate letter.