



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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MEMORANDUM

TO: The Commission

FROM: Christopher Hughey
Deputy General Counsel

Daniel A. Petalas
Associate General Counsel for Enforcement

Kathleen Guith
Deputy Associate General Counsel for Enforcement

BY: Susan L. Lebeaux *SLL*
Assistant General Counsel

Delbert K. Rigsby *DKR*
Attorney

SUBJECT: MUR 6539 (Joe Green) – Pre-Probable Cause
Conciliation Agreement

2012 APR 25 A 9:18

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SECRETARIAT

Attached is a conciliation agreement signed by Joe Green. The agreement, which we recommend that the Commission accept, would settle Joe Green's knowing and willful violations of 2 U.S.C. §§ 432(c), 434(b) and 439a(b) for failing to maintain proper records of disbursements of Geoff Davis for Congress ("Committee"), failing to file accurate reports of disbursements on the Committee's disclosure reports, and converting Committee funds for his personal use.

The agreement also requires Green to refund \$1,443.03 to the Committee, which is the remaining amount of the unauthorized payments to himself from Committee funds that have yet to be refunded. We believe that the civil penalty is sufficient to reflect the seriousness of the violations and to deter future violations. Therefore, we recommend that the Commission accept the conciliation agreement and close the file.

RECOMMENDATIONS

1. Accept the attached signed conciliation agreement with Joe Green;
2. Approve the appropriate letter; and
3. Close the file.

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