



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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MEMORANDUM


TO: The Commission

FROM: Daniel A. Petalas
Acting General Counsel

Kathleen Guith
Acting Associate General Counsel for Enforcement

Stephen Gura
Deputy Associate General Counsel for Enforcement

BY: Mark Shonkwiler 
Assistant General Counsel

Kamau Philbert 
Attorney

SUBJECT: MUR 6964 (Afghanistan and Iraq Veterans for Congress PAC)
Pre-Probable Cause Conciliation Agreement

Attached is a conciliation agreement signed by Kieran Lalor in his official capacity as treasurer, on behalf of Afghanistan and Iraq Veterans for Congress PAC (the "Committee"). *See* Attachment 1. We recommend the Commission accept this agreement to settle a violation of 52 U.S.C. § 30104(b) stemming from the Committee's failure to accurately disclose receipts and disbursements on its original 2012 30-Day Post-General Report. *See* Certification, MUR 6964 (Sept. 16, 2015) (finding reason to believe that the Committee violated 52 U.S.C. § 30104(b) and authorizing pre-probable cause conciliation).

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8 We believe that this agreement sufficiently vindicates the Commission's
9 enforcement interests under the circumstances presented in this matter. Therefore, we
10 recommend that the Commission accept the attached signed conciliation agreement and close the
11 file in this matter.
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13 **RECOMMENDATIONS:**
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- 15 1. Accept the attached signed conciliation agreement with Afghanistan and Iraq
16 Veterans for Congress PAC and Kieran Lalor in his official capacity as treasurer.
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18 2. Approve the appropriate letter.
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20 3. Close the file.
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