



FEDERAL ELECTION COMMISSION
Washington, DC 20463

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2 TO: The Commission
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4 FROM: Lisa J. Stevenson
5 Acting General Counsel
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7 Kathleen M. Guith
8 Associate General Counsel for Enforcement
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10 Stephen Gura
11 Deputy Associate General Counsel for Enforcement
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13 BY: Jin Lee *JL*
14 Acting Assistant General Counsel
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16 Nicholas O. Mueller *NOM*
17 Attorney
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19 SUBJECT: MUR 7256 (The Council of Insurance Agents & Brokers PAC)
20 Pre-Probable Cause Conciliation and Case Closing Memorandum
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22 This matter was generated as a result of a referral from the Reports Analysis Division
23 ("RAD"). RAD referred The Council of Insurance Agents & Brokers PAC and Ken A. Crerar in
24 his official capacity as treasurer ("Committee") for failing to timely disclose two \$700,000
25 transfers of funds to and from its connected organization, The Council of Insurance Agents &
26 Brokers. On June 22, 2017, the Commission found reason to believe that the Committee violated
27 52 U.S.C. § 30104(b)(3) and (4).¹ The Commission authorized pre-probable cause conciliation
28 and approved a conciliation agreement. We have
29 completed our negotiations with the Committee and recommend that the Commission accept the
30 signed agreement.
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¹ Cert. at 2, MUR 7256 (June 22, 2017).

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7 Therefore, we
8 believe these changes are acceptable and represent a reasonable compromise to settle the
9 violations, and we recommend that the Commission accept the signed agreement.

- 10 1. Accept the attached signed conciliation agreement with The Council of Insurance
11 Agents & Brokers PAC and Ken A. Crerar in his official capacity as treasurer;
12 2. Approve the appropriate letters; and
13 3. Close the file.
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³ See *id.* ¶ IV.8.

⁴ See *id.* ¶ IV.9.