



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

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MEMORANDUM

TO: The Commission

FROM: Daniel A. Petalas *DAP*  
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BY: Kathleen Guith *KG*  
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SUBJECT: MUR 6528 (Michael Grimm for Congress, *et al.*)  
Close Entire File

This matter was generated by a complaint alleging that former U.S. Representative Michael Grimm and Michael Grimm for Congress and Nancy H. Watkins in her official capacity as treasurer (the "Committee") solicited and received contributions that violated various provisions of the Federal Election Campaign Act of 1971, as amended (the "Act"). On April 22, 2015, the Commission found reason to believe that the Committee violated 52 U.S.C. §§ 30104(b), 30116(f), and 30122. On October 5, 2015, the Commission found reason to believe that the Committee and Michael Grimm knowingly and willfully violated 11 C.F.R. § 110.20, and entered into pre-probable cause conciliation with Grimm and the Committee. In addition, the Commission took no action on the allegations that Grimm knowingly and willfully violated 52 U.S.C. §§ 30116(f) and 30122, and took no further action on the previous reason to believe findings that the Committee violated 52 U.S.C. §§ 30104(b), 30116(f), and 30122.

At that time, the Commission also took no action on the allegations that Ofer Biton, Rabbi Yoshiyahu Yosef Pinto, Mosdot Shuva Israel Synagogue, and Unknown Respondents A, B, and C violated the Act and closed the file as to them.

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4 In light of the imminent expiration of the statute of limitations regarding the allegations  
5 in the complaint, and in consideration of the Commission's priorities and limited resources, we  
6 now recommend that the Commission close the file in MUR 6528 in its entirety.  
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8 **RECOMMENDATIONS:**  
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- 10 1. Close the entire file.  
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12 2. Approve the appropriate letters.

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