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FEDERAL ELECTION COMMISSION  
Washington, DC 20463

CELA

SENSITIVE

**MEMORANDUM**

**TO:** The Commission

**FROM:** Anthony Herman  
General Counsel

Kathleen Guith  
Deputy Associate General Counsel for Enforcement

**BY:** Peter Blumberg *PLB*  
Assistant General Counsel

Dominique Dillenseger *dd*  
Attorney

**SUBJECT:** MUR 6716 (National Campaign Fund)  
Pre-Probable Cause Conciliation

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Attached is a revised conciliation agreement which settles violations of 2 U.S.C. § 434(b) and (g) and 11 C.F.R. § 104.4(a), (b) and (c) by the National Campaign Fund and James Lacy in his official capacity as treasurer ("Committee") involving the failure to timely file 24- and 48-hour notices of independent expenditures, the failure to properly disclose independent expenditures on Schedule E of disclosure reports filed with the Commission, and the misstatement of financial activity. Attachment 1.

Therefore, we recommend that the Commission accept the attached conciliation agreement and close the file.

**RECOMMENDATIONS:**

1. Accept the attached conciliation agreement with the National Campaign Fund and James Lacy in his official capacity as treasurer.
2. Approve the appropriate letter.
3. Close the file.