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FEDERAL ELECTION
COMMISSION
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SENSITIVE

Federal Election Commission
Washington, DC 20463

MEMORANDUM

October 28, 2014

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TO: The Commission

THROUGH: Alec Palmer *W/H for*
Staff Director

FROM: Patricia C. Orrock *PCO*
Chief Compliance Officer

Lynn M. Fraser *DWJ*
Director, ADR Office

SUBJECT: ADR 726 Joe Kyrillos For US Senate, Inc. and Ronald
Gravino, Treasurer, Recommendation to Approve
Settlement Agreement

RESOLUTION TERMS: Certify the closure of the Committee's federal account and
work with Commission staff to terminate their political
committee status and reporting obligations with the
Commission; and pay a civil penalty of \$5,200.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 726 (RR 14L-03). The ADR Office received this referral from the Office of General Counsel on June 30, 2014.

SUMMARY: In this case, the Reports Analysis Division (RAD) referred Respondents for accepting excessive contributions totaling \$138,950 from two (2) individuals, eight (8) partnerships, and one (1) federal political action committee (PAC) not qualified for multicandidate status during the 2012 election cycle. Respondents failed to remedy these contributions within the permissible timeframe.

The Committee contends that the excessive contributions were accepted due to a misunderstanding of the FECA, specifically those provisions dealing with how to attribute a partnership contribution. Respondents further contend that they were able to refund all the excessive contributions, albeit untimely. The Committee requests to terminate its reporting obligations.

Recommendation to Approve
Settlement Agreement
ADR 726 (RR 14L-03)
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