

FEB 10 2005

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COMMISSION  
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of:

Bill Shehan, Jr.

MUR 5335R

2005 FEB 10 A 11: 33

**SENSITIVE**

GENERAL COUNSEL'S REPORT # 4

**I. ACTIONS RECOMMENDED**

Accept the attached conciliation agreement with Bill Shehan, Jr., close the entire file and approve the appropriate letters.

**II. BACKGROUND AND DISCUSSION**

This matter involves campaign contributions made on behalf of minor children. On February 12, 2004, the Commission found reason to believe that Bill Shehan, Jr. knowingly and willfully violated 2 U.S.C. §§ 441a(a)(1)(A) and 441f.<sup>1</sup> At Mr. Shehan's request, on November 9, 2004, the Commission determined to enter into negotiations directed toward reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe

Based on the foregoing, this Office recommends that the Commission accept the attached conciliation agreement and close the file in this matter.

<sup>1</sup> The events that are the subject of this complaint occurred prior to November 6, 2002, the effective date of the Bipartisan Campaign Reform Act of 2002 ("BCRA"), Pub L 107-155, 116 Stat 81 (2002). Therefore, unless noted to the contrary, all references to statutes and regulations in this report pertain to those that were in effect prior to the implementation of BCRA.

III. RECOMMENDATIONS

1. Accept the attached conciliation agreement as signed by Bill Shehan, Jr.
2. Close the entire file.
3. Approve the appropriate letters.

Lawrence H. Norton  
General Counsel

2/9/05  
Date

BY:

Rhonda J. Vosdingh  
Rhonda J. Vosdingh  
Associate General Counsel  
for Enforcement

Sidney Locke  
Sidney Locke  
Assistant General Counsel

Ana Peña-Wallace  
Ana Peña-Wallace  
Attorney

Attachment:

1. Signed conciliation agreement and copy of civil penalty check