



FEDERAL ELECTION COMMISSION
Washington, DC 20463

1 **MEMORANDUM**

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3 **TO:** The Commission

4
5 **FROM:** Lisa J. Stevenson
6 Acting General Counsel

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8 Charles Kitcher
9 Acting Associate General Counsel for Enforcement

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11 **BY:** Stephen Gura *SG*
12 Deputy Associate General Counsel for Enforcement

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14 Jin Lee *JL*
15 Acting Assistant General Counsel

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17 Amanda Andrade *AA by JL*
18 Attorney

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20 Jonathan Peterson *JAP*
21 Attorney

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23 **SUBJECT:** MUR 6538R (Americans for Job Security)

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26 On October 18, 2016, the Commission found reason to believe that Americans for Job
27 Security ("AJS") violated 52 U.S.C. §§ 30102, 30103, and 30104 by failing to organize, register,
28 and report with the Commission as a political committee in 2010.¹ On March 26, 2019,
29 following an investigation and Second General Counsel's Report, the Commission authorized
30 pre-probable cause conciliation with AJS
31 and a requirement for AJS to register as a political committee and
32 file disclosure reports.² These actions were the culmination of a years-long process, including a
33 remand from the U.S. District Court for the District of Columbia.³ Since the Complaint in this

¹ Certification, MUR 6538R (AJS) (Oct. 18, 2016) (finding reason to believe AJS violated 52 U.S.C. §§ 30102, 30103, and 30104); Certification, MUR 6538R (AJS) (Apr. 26, 2017) (approving Factual and Legal Analysis making clear that violation stems from activity in 2010).

² Certification, MUR 6538R (AJS) (Mar. 26, 2019).

³ *Citizens for Responsibility and Ethics in Washington v. FEC*, 209 F. Supp. 3d 77 (D.D.C. 2016).

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In sum, we believe that, under the circumstances, this agreement is a reasonable resolution of this matter, and we recommend that the Commission accept it.

RECOMMENDATIONS:

1. Accept the attached conciliation agreement with Americans for Job Security;
2. Approve the appropriate letter; and
3. Close the file.

⁹ See, e.g., Conciliation Agreement ¶ VI.1, MUR 5646 (Cohen for New Hampshire).