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COMMISSION

2015 JUN 25 PM 2:18



FEDERAL ELECTION COMMISSION
Washington, DC 20463

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3 TO: The Commission
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5 FROM: Daniel A. Petalas *DAP*
6 Associate General Counsel for Enforcement
7
8 BY: Peter G. Blumberg *PKB*
9 Assistant General Counsel
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11 Michael A. Columbo *MAC*
12 Attorney
13
14 SUBJECT: MUR 6850 (Arvin Black)
15 Probable Cause Conciliation
16

17 **I. INTRODUCTION**
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19 On April 16, 2015, the Commission found probable cause to believe that Arvin Black
20 ("Respondent") violated 52 U.S.C. §§ 30122 and 30116(a) by making excessive contributions in
21 the names of others in the amount of \$9,600 to Friends of Mike Lee (the "Committee"). The
22 Commission authorized the Office of General Counsel to attempt to settle these violations
23 through probable cause conciliation and approved a proposed conciliation agreement. Attached
24 is a revised agreement negotiated with Respondent which would resolve the violations. We
25 recommend that the Commission accept the negotiated agreement and close the file as to Arvin
26 Black.
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MUR 6919 (Rod Lewis)
Memorandum to the Commission
Page 2 of 2

1 We believe this agreement sufficiently vindicates the Commission's enforcement
2 interests under the circumstances presented in this matter. Therefore, we recommend that the
3 Commission accept the attached signed conciliation agreement with Respondent Arvin Black,
4 approve the appropriate letter, and close the file as to Black.

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6 **III. RECOMMENDATIONS**

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8 1. Accept the attached signed conciliation agreement with Arvin Black.
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10 2. Approve the appropriate letter.
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12 3. Close the file as to Arvin Black.
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