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FEDERAL ELECTION COMMISSION
Washington, DC 20463**MEMORANDUM**

TO: The Commission

FROM: Daniel A. Petalas *DAP*
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SUBJECT: MUR 6850 (Swallow)

RE: Proposed Conciliation Agreement for Probable Cause Conciliation

Attached is a proposed conciliation agreement for probable cause conciliation with Respondent John Swallow. It contains a summary of the relevant facts, Swallow's admission to the violation, a cease and desist clause, The proposed conciliation agreement is intended for the Commission's consideration along with the Office of the General Counsel's Notice to the Commission Following the Submission of Probable Cause Brief ("OGC Notice"). The OGC Notice, which is circulating simultaneously with this memorandum, informs the Commission that OGC intends to proceed with the recommendation to find probable cause to believe that Swallow knowingly and willfully violated 52 U.S.C. § 30122 based on the factual and legal analysis set forth in the General Counsel's Brief.
