



FEDERAL ELECTION COMMISSION

**MEMORANDUM**

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4 **TO:** The Commission  
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6 **FROM:** Lisa J. Stevenson  
7 Acting General Counsel  
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9 Charles Kitcher  
10 Associate General Counsel for Enforcement  
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12 **BY:** Peter G. Blumberg PGB<sup>AR</sup>  
13 Assistant General Counsel  
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15 Aaron Rabinowitz AR  
16 Attorney  
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18 **SUBJECT:** MUR 7867 (Our American Century) Recommendation to Accept the Signed  
19 Conciliation Agreement  
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22 On April 26, 2022, the Commission found reason to believe that Our American Century  
23 and Cabell Hobbs in his official capacity as treasurer (the "Respondent") violated 52 U.S.C.  
24 § 30120(a) and 11 C.F.R. § 110.11 by failing to include valid disclaimers on advertising placed  
25 on the Google platform.<sup>1</sup> On June 2, 2022, the Commission authorized the Office of the General  
26 Counsel to engage in pre-probable cause conciliation with the Respondent to resolve this  
27 violation.<sup>2</sup>

28 Attached is a conciliation agreement that has been signed by the Respondent.  
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<sup>1</sup> Certification ("Cert.") (Apr. 28, 2022).

<sup>2</sup> Cert. (June 2, 2022).

MUR 7867 (Our American Century)

Memorandum to the Commission

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1 therefore recommend that the Commission accept the signed conciliation agreement with Our  
2 American Century and Cabell Hobbs in his official capacity as treasurer and close the file.

3 **RECOMMENDATIONS:**

4 1. Accept the attached conciliation agreement;

5 2. Approve the appropriate letters; and

6 3. Close the file.

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