



FEDERAL ELECTION COMMISSION

1
2 **MEMORANDUM**
3
4 **TO:** The Commission
5
6 **FROM:** Lisa J. Stevenson
7 Acting General Counsel
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9 Charles Kitcher
10 Associate General Counsel for Enforcement
11
12 **BY:** Peter G. Blumberg *PGB*
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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21 On April 26, 2022, the Commission found reason to believe that Our American Century
22 and Cabell Hobbs in his official capacity as treasurer (the “Respondent”) violated 52 U.S.C.
23 § 30120(a) and 11 C.F.R. § 110.11 by failing to include valid disclaimers on advertising placed
24 on the Google platform.¹ On June 2, 2022, the Commission authorized the Office of the General
25 Counsel to engage in pre-probable cause conciliation with the Respondent to resolve this
26 violation.²

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28 Attached is a conciliation agreement that has been signed by the Respondent.
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35 We

¹ Certification (“Cert.”) (Apr. 28, 2022).

² Cert. (June 2, 2022).

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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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