



**FEDERAL ELECTION COMMISSION**  
Washington, DC

October 10, 2024

**MEMORANDUM**

**TO:** The Commission

**FROM:** Lisa J. Stevenson  
Acting General Counsel

Claudio J. Pavia  
Deputy Associate General Counsel for Enforcement

**BY:** Mark Allen *MA*  
Assistant General Counsel

Constantine Soupis *CS*  
Attorney

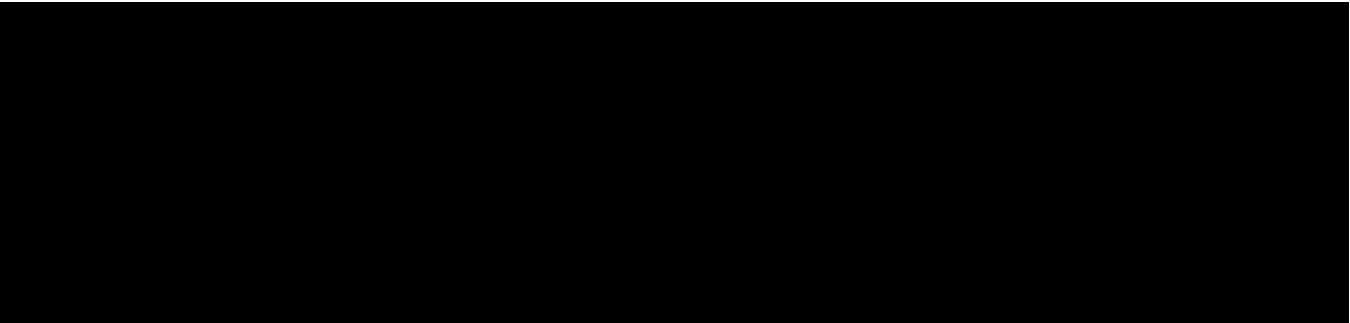
**SUBJECT:** MUR 8212 (Country Over Party PAC) Pre-Probable Cause Conciliation

On February 6, 2024, the Commission opened a MUR and found reason to believe that Country Over Party PAC (f/k/a Kinzinger for Congress) and Paul Kilgore in his official capacity as treasurer violated 52 U.S.C. § 30116(f) and 11 C.F.R. § 102.9(e)(3) by failing to timely remedy general election contributions.<sup>1</sup> The Commission authorized the Office of General Counsel (“OGC”) to engage in pre-probable cause conciliation with Country Over Party PAC.<sup>2</sup> Attached is a signed Conciliation Agreement signed by Country Over Party PAC’s treasurer and a redlined version as compared to the opening offer approved by the Commission. We recommend that the Commission accept the signed agreement and close the file in this matter.

<sup>1</sup> Certification ¶ 2.b (Feb. 8, 2024).

<sup>2</sup> *Id.* ¶ 2.d.

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In sum, we believe this settlement represents an acceptable resolution of the matter. Therefore, we recommend that the Commission accept the signed Conciliation Agreement with Country Over Party PAC and close the file.

**RECOMMENDATIONS:**

1. Accept the attached signed Conciliation Agreement;
2. Approve the appropriate letter; and
3. Close the file effective 30 days from the date the certification of this vote is signed (or on the next business day after the 30th day, if the 30th day falls on weekend or holiday).

