RECEIVED FEDERAL ELECTION COMMISSION
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1	FEDERAL ELECTION COMMISSION
2 3 4 5 6	In the Matter of  Aristotle International, Inc.  2015 APR 30 APR
7	THIRD GENERAL COUNSEL'S REPORT
8	I. ACTIONS RECOMMENDED
9	We recommend that the Commission: (1)
10	("Aristotle" or "Respondent") and
11	(2) approve the appropriate letters.
12	II. INTRODUCTION
13	On May 26, 2011, the Commission found reason to believe that Aristotle violated
14	52 U.S.C. § 30111(a)(4) (formerly 2 U.S.C. § 438(a)(4)), the Act's "sale and use" provision, by
15	incorporating FEC data into its Aristotle 360 Relationship Viewer software program
16	("Relationship Viewer") for the purpose of soliciting contributions or for commercial purposes.
17	See Factual and Legal Analysis, MUR 6334 (Aristotle Int'l, Inc.) ("F&LA"); Certification, MUR
18	6334 (Aristotle Int'l, Inc.) (May 26, 2011). Following investigation, on November 20, 2012, the
19	Office of General Counsel ("OGC") circulated a Second General Counsel's Report
20	recommending that the Commission approve pre-probable cause conciliation
21	On November 19, 2013, the Commission voted to approve the
22	proposed conciliation agreement

On September 1, 2014, the Federal Election Campaign Act, as amended, (the "Act") was transferred from Title 2 to new Title 52 of the United States Code.

At that time, the Commission also authorized the use of its compulsory process to investigate further the extent of Aristotle's violation.

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See

Certification, MUR 6334 (Aristotle Int'l, Inc.) (Nov. 19, 2013).

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## IV. **RECOMMENDATIONS**

2. Approve the appropriate letters.

BY: Daniel A. Petalas

Associate General Counsel for Enforcement

Assistant General Counsel for Enforcement

Allison T. Steinle

Attorney