



FEDERAL ELECTION COMMISSION

MEMORANDUM

May 7, 2024

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3 **TO:** The Commission
4
5 **FROM:** Lisa J. Stevenson
6 Acting General Counsel
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8 Charles Kitcher
9 Associate General Counsel for Enforcement
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11 Adrienne Baranowicz
12 Deputy Associate General Counsel for Enforcement
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14 **BY:** Mark D. Shonkwiler *MS*
15 Assistant General Counsel
16
17 Kimberly D. Hart *KH/ms*
18 Attorney
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20 **SUBJECT:** MUR 8080 (Pericle Communications Company, *et al.*)
21 Recommendation to Accept Signed Conciliation Agreement
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24 On January 11, 2024, the Commission found reason to believe that Pericle
25 Communications Company (“Pericle”), a federal government contractor, violated 52 U.S.C.
26 § 30119(a)(1) and 11 C.F.R. § 115.2(a), provisions of the Federal Campaign Election Act of
27 1971, as amended (the “Act”) and the Commission’s regulations by making a prohibited \$25,000
28 contribution to For Colorado’s Future, an independent expenditure only political committee.¹
29 The Commission also authorized the Office of General Counsel to engage in pre-probable cause
30 conciliation with Pericle and approved a conciliation agreement [REDACTED]
31 [REDACTED] The Commission took no action at that time as to For Colorado’s Future and
32 Paul Kilgore, in his official capacity as treasurer.³

1 Certification ¶¶ 1 and 4 (Pericle Communications Co.) Jan. 12, 2024).

2 *Id.* ¶¶ 2 and 5;

3 *Id.* ¶ 3.

1 We recommend that the Commission accept the attached signed agreement with Pericle,
2 which contains no changes from the agreement approved by the Commission.⁴

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4 Given that the conciliation negotiations produced no information regarding any knowing
5 solicitation of the government contractor contribution, we also recommend that the Commission
6 dismiss this matter as to For Colorado’s Future and Paul Kilgore, in his official capacity as
7 treasurer.

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9 We also recommend that the Commission approve the appropriate letters and close the
10 file effective 30 days from the date of the certification of this vote (or on the next business day
11 after the 30th day, if the 30th day falls on a weekend or holiday).

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13 **RECOMMENDATIONS**

- 14 1. Accept the attached signed conciliation agreement with Pericle Communications
15 Company;
- 16 2. Dismiss this matter as to For Colorado’s Future and Paul Kilgore, in his official
17 capacity as treasurer:
- 18 2. Approve the appropriate letters; and
- 19 3. Close the file effective 30 days from the date of certification of this vote (or on
20 the next business day after the 30th day, if the 30th day falls on a weekend or
21 holiday).



4 Attach. 1.