



FEDERAL ELECTION COMMISSION

Washington, D.C. 20463

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Charles Kitcher
Acting Associate General Counsel for Enforcement

Stephen Gura
Deputy Associate General Counsel for Enforcement

BY: Mark Allen *MA*
Assistant General Counsel

Roy Q. Luckett *RQL*
Attorney

SUBJECT: MUR 7586 (International Council of Shopping Centers, Inc., *et al.*)
Recommendation to Accept Signed Conciliation Agreement

On March 20, 2019, the Commission found reason to believe that International Council of Shopping Centers, Inc. ("ICSC") violated 52 U.S.C. §§ 30118(a) and 30102(b)(2) and 11 C.F.R. §§ 102.6(c)(4) and 102.8(b) and found reason to believe that the International Council of Shopping Centers, Inc. Political Action Committee ("ICSC PAC") violated 52 U.S.C. §§ 30118(a), 30102(b)(2) and 30104(b) and 11 C.F.R. § 102.6(c)(1). The Commission found that ICSC improperly deposited corporate funds into ICSC PAC's federal account, ICSC did not timely transfer PAC contributions, and ICSC PAC inaccurately reported its cash-on-hand. The Commission authorized the Office of the General Counsel to engage in pre-probable cause conciliation with Respondents.

We
recommend that the Commission accept this agreement and close the file in this matter.

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19 We believe this negotiated settlement represents a reasonable resolution of the matter.
20 We therefore recommend that the Commission accept the signed conciliation agreement with
21 Respondents and close the file.
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23 **RECOMMENDATIONS:**

- 24 1. Accept the attached conciliation agreement.
25 2. Approve the appropriate letter.
26 3. Close the file.
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¹ Laird remains identified as the ICSC PAC treasurer in the caption and the preamble statement of the Commission's reason-to-believe findings.