

BEFORE THE FEDERAL ELECTION COMMISSION

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FEDERAL ELECTION  
COMMISSION

2010 DEC -3 PM 12: 58

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In the Matter of )  
 )  
 John Callahan; John Callahan for )  
 Congress and John V. Filipos, in his )  
 official capacity as treasurer; Friends of ) MUR 6257  
 John Callahan and John V. Filipos, in )  
 his official capacity as treasurer )

AMENDED CERTIFICATION

I, Shawn Woodhead Werth, recording secretary for the Federal Election Commission executive session on October 19, 2010, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 6257:

1. Find reason to believe that John Callahan, Friends of John Callahan and John V. Filipos, in his official capacity as treasurer, and John Callahan for Congress and John V. Filipos, in his official capacity as treasurer, violated 2 U.S.C. § 441i(e) and 11 C.F.R. § 110.3(d).
2. Find reason to believe that John Callahan for Congress and John V. Filipos, in his official capacity as treasurer, violated 2 U.S.C. § 434(b)(3) and (4).
3. Approve the Factual and Legal Analysis, as recommended in the General Counsel's Report dated August 16, 2010, subject to the amendments previously circulated.
4.
5. Approve the appropriate letter.

Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

December 3, 2010  
Date

Shawn Woodhead Werth  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**VIA FACSIMILE AND FIRST CLASS MAIL**

Neil Reiff, Esq.  
Sandler, Reiff & Young, P.C.  
300 M St. SE, Suite 1102  
Washington, DC 20003  
Facsimile: (202) 479-1115

DEC 08 2010

RE: MUR 6257  
John Callahan, *et al.*

Dear Mr. Reiff:

On March 3, 2010, the Federal Election Commission (the "Commission") notified your clients of a complaint alleging that they violated the Federal Election Campaign Act of 1971, as amended (the "Act"), and provided a copy of the complaint to your clients.

After reviewing the allegations contained in the complaint, your clients' response, and publicly available information, the Commission, on October 19, 2010, found reason to believe that John Callahan, Friends of John Callahan and John V. Filipos, in his official capacity as treasurer, and John Callahan for Congress and John V. Filipos, in his official capacity as treasurer, violated 2 U.S.C. § 441i(e) and 11 C.F.R. § 110.3(d), provisions of the Act and the Commission's regulations. In addition, the Commission found reason to believe that John Callahan for Congress and John V. Filipos, in his official capacity as treasurer, violated 2 U.S.C. § 434(b)(3) and (4). Enclosed is the Factual and Legal Analysis that sets forth the basis for the Commission's determination.

Please note that you have a legal obligation to preserve all documents, records and materials relating to this matter until such time as you are notified that the Commission has closed its file in this matter. See 18 U.S.C. § 1519.

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On behalf of the Commission,



Matthew S. Petersen  
Chairman

Enclosures  
Factual and Legal Analysis

1 **FEDERAL ELECTION COMMISSION**

2  
3 **FACTUAL AND LEGAL ANALYSIS**

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6 **RESPONDENTS: John Callahan MUR: 6257**  
7 **John Callahan for Congress and**  
8 **John V. Filipos, in his official capacity as treasurer**  
9 **Friends of John Callahan and John V. Filipos,**  
10 **in his official capacity as treasurer**  
11

12 **I. INTRODUCTION**

13 This matter was generated by a complaint filed with the Federal Election Commission by  
14 Robert A. Gleason, Jr., alleging violations of the Federal Election Campaign Act of 1971, as  
15 amended (the "Act"), by John Callahan, Friends of John Callahan and John V. Filipos, in his  
16 official capacity as treasurer, ("Mayoral Committee") and John Callahan for Congress and John  
17 V. Filipos, in his official capacity as treasurer ("Federal Committee").

18 In 2009, John Callahan was simultaneously an unopposed candidate for mayor of  
19 Bethlehem, Pennsylvania and a federal candidate for Pennsylvania's 15<sup>th</sup> Congressional District.  
20 The complaint in this matter alleges that Callahan's mayoral campaign paid for research used to  
21 determine the feasibility of Callahan running for Congress. Callahan's mayoral committee,  
22 Friends of John Callahan and John V. Filipos, in his official capacity as treasurer, ("Mayoral  
23 Committee") made two payments totaling \$9,932 to vendor Stanford Campaigns, the first on  
24 May 6, 2009 for \$4,500 and the second on June 22, 2009, for opposition self-research.<sup>1</sup> The  
25 complaint alleges that the research was for the purpose of "testing the waters" in connection with  
26 a possible federal candidacy, and therefore constituted an impermissible in-kind contribution to  
27 John Callahan and Callahan for Congress and John V. Filipos, in his official capacity as treasurer

<sup>1</sup> According to their website, Stanford Research, an entity in Austin, Texas, performs a wide variety of campaign-related services, including opposition research, for various organizations, including local, state and Federal candidates. <http://www.oppresearch.com>.

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1 ("Federal Committee"). Complaint at 3. The complaint further alleges that the Federal  
2 Committee did not disclose the contribution.

3 The Respondents deny that the research was "testing the waters" activity related to  
4 Callahan's federal candidacy. Instead, they state that the research commissioned by the Mayoral  
5 Committee had "inherent value" and was "procured, and originally used" by Callahan's mayoral  
6 campaign, and was therefore properly paid for with funds from the Mayoral Committee.  
7 Response at 1, 2. The Respondents also state that when the Federal Committee eventually  
8 utilized the research to further Callahan's federal candidacy in January 2010, it paid the Mayoral  
9 Committee what it believed to be the fair market value of the research and timely disclosed the  
10 disbursement. *Id* at 2.

11 Based on the complaint, the response, and other available information, the Commission  
12 found reason to believe that John Callahan, Friends of John Callahan and John V. Filipos, in his  
13 official capacity as treasurer, and John Callahan for Congress and John V. Filipos, in his official  
14 capacity as treasurer, violated 2 U.S.C. § 441i(e) and 11 C.F.R. § 110.3(d), and that John  
15 Callahan for Congress and John V. Filipos, in his official capacity as treasurer, violated 2 U.S.C.  
16 § 434(b)(3) and (4).

17 **II. FACTUAL AND LEGAL ANALYSIS**

18 **A. Factual Summary**

19 John Callahan is a candidate for the United States House of Representatives for  
20 Pennsylvania's 15<sup>th</sup> Congressional District. Callahan officially announced his federal candidacy  
21 on July 27, 2009. He filed his Statement of Candidacy with the Commission on July 31, 2009,  
22 and his Federal Committee filed its Statement of Organization on the same day. Before that time  
23 he had made no official statements indicating that he had decided to run and raised no funds for a

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1 Congressional race.<sup>2</sup> The Federal Committee timely filed its first disclosure report, the 2009  
2 October Quarterly Report, on October 15, 2009.

3 Callahan is also the current mayor of Bethlehem, Pennsylvania. He was first elected to  
4 the office in November 2003, and ran for and won re-election in 2005 and 2009. See  
5 <http://www.bethlehem-pa.gov/about/mayor>. He ran unopposed in the 2005 general election, as  
6 well as in the May 19, 2009, primary and the November 3, 2009, general election. *Id.*

7 The complaint alleges that disbursements made by Callahan's Mayoral Committee to  
8 Stanford Campaigns funded "testing the waters" activity related to Callahan's federal candidacy,  
9 and that "[c]ertainly the results of this research were used in determining whether or not  
10 Callahan should become a candidate," and therefore constituted an impermissible in-kind  
11 contribution to the Federal Committee. In support of the allegation, the complaint points to an  
12 October 22, 2009, article ("*Morning Call* article") regarding the opposition research tactics of  
13 Callahan and Representative Charlie Dent, the leading Democratic and Republican candidates  
14 for the 15<sup>th</sup> District Congressional seat, respectively. Complaint, Attachment 3. The article  
15 reports that, "Callahan, before he even announced a run, hired a Democratic research firm to find  
16 out what criminal background checks in the name John Callahan would dig up, according to  
17 campaign manager Justin Schall." *Id.* The article also states that Callahan was curious to know  
18 "what a check of contractors who had done business with the city would reveal." *Id.*

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<sup>2</sup> Although Callahan declared his candidacy on July 25, 2009, he reportedly "confirmed his interest" in a Federal candidacy as early as June 24, 2009, when he stated that he was "seriously considering a run." See Lynn Olanoff, *U.S. Rep. Charlie Dent's Campaign Manager Calls for Bethlehem Mayor John Callahan to Drop his Mayoral bid if he runs for Congress* (June 25, 2009), at <http://www.lehighvalleylive.com/bethlehem/index.ssf?/base/news-1/12459027875130.xml&coll=3> (last visited August 3, 2010). See also Bill Wichert, *Bethlehem Mayor John Callahan announces Congressional Bid*, (July 25, 2009), at [http://www.lehighvalleylive.com/bethlehem/index.ssf?2009/07/bethlehem\\_mayor\\_john\\_callahan\\_2.html](http://www.lehighvalleylive.com/bethlehem/index.ssf?2009/07/bethlehem_mayor_john_callahan_2.html) (Callahan announces his Congressional candidacy).

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1 Respondents deny that the research was “testing the waters” activity in relation to  
2 Callahan’s federal candidacy, and instead maintain that it had “inherent value” to the mayoral  
3 campaign and therefore was properly paid for with funds from the Mayoral Committee.  
4 Response at 2. Respondents also maintain that background self-research, unlike a poll, does not  
5 clearly indicate that a candidate is considering a run for office, but “may be used for a variety of  
6 purposes not related to federal elections.” *Id.* at 3. They also assert that at the time of the  
7 payments, Callahan had made no decision regarding a possible Congressional run and was in fact  
8 still raising funds for his mayoral election. *Id.* at 2.

9 Respondents point out that the *Morning Call* article does not directly quote Callahan’s  
10 federal campaign manager, and that he never stated that the research was to benefit the federal  
11 campaign, or even to “test the waters” for a possible federal candidacy. *Id.* at 3. Respondents  
12 also state that the federal campaign manager “made clear to the reporter several times that the  
13 research had intrinsic value to the ongoing mayoral campaign and therefore had to be paid for  
14 with funds from the mayoral campaign committee.” *Id.* In addition, Respondents maintain that  
15 the federal campaign manager informed the reporter that “the federal campaign was not using the  
16 research but that, when and if the mayoral campaign was over, and a potential federal campaign  
17 decided to utilize the research, the federal committee would pay the Mayoral committee the fair  
18 market value for use of the research.” *Id.* According to Respondents, the Federal Committee  
19 paid \$5,000 to the Mayoral Committee on January 15, 2010 “for the pro-rated cost to purchase  
20 the research,” before it used the research. *Id.* at 4. The Federal Committee reported that \$5,000  
21 payment on its 2010 April Quarterly Report filed with the Commission.

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1           **B. Legal Analysis**

2           The Act prohibits a federal candidate, a candidate's agent and entities established,  
3           financed, maintained or controlled by them from soliciting, receiving, directing, transferring or  
4           spending funds in connection with a federal election, unless those funds are subject to the  
5           limitations, prohibitions and reporting requirements of the Act. 2 U.S.C. § 441i(e)(1)(A).

6           Likewise, transfers of funds or assets from a candidate's non-federal campaign committee or  
7           account to his or her principal campaign committee for a federal election are prohibited.

8           11 C.F.R. § 110.3(d). A candidate's federal campaign committee may, however, purchase  
9           goods and services from its non-federal campaign committee so long as the federal campaign  
10          committee pays the "usual and normal charge" for such goods and services. 2 U.S.C.

11          §§ 431(8)(A)(i); 441b(b)(2); 11 CFR 100.52(d)(1).

12          In 2009, the Mayoral Committee paid \$9,932 for opposition self-research by Stanford  
13          Campaigns. On January 15, 2010, the Federal Committee paid the Mayoral Committee \$5,000  
14          for "the pro-rated cost to purchase the research." Response at 3. However, it is unclear on what  
15          basis the Federal Committee calculated its pro-rated share of the research that it purchased. If  
16          the Federal Committee used the entire file that Stanford Campaigns compiled for the Mayoral  
17          Committee in the middle of 2009 for \$9,932, then the \$5,000 that the Federal Committee paid for  
18          the research in January 2010, may not have been the usual and normal charge for that research,  
19          which would be in violation of the Act and Commission regulations.

20          Based on the above, the Commission found reason to believe that John Callahan, Friends  
21          of John Callahan and John V. Filipos, in his official capacity as treasurer, and John Callahan for  
22          Congress and John V. Filipos, in his official capacity as treasurer, violated 2 U.S.C. § 441i(e)  
23          and 11 C.F.R. § 110.3(d). The Commission also found reason to believe that John Callahan for

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- 1 Congress and John V. Filipos, in his official capacity as treasurer, violated 2 U.S.C. § 434(b)(3)**
- 2 and (4).**

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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**MEMORANDUM**

**TO:** The Commission

**FROM:** Christopher Hughey  
Acting General Counsel

Kathleen M. Guith  
Acting Associate General Counsel for Enforcement

Susan L. Lebeaux  
Acting Deputy Associate General Counsel for Enforcement

**BY:** Peter G. Blumberg *PGB*  
Assistant General Counsel

Wanda D. Brown *WB*  
Attorney

**SUBJECT:** MUR 6257 (Callahan, *et al.*)

**RE:** Pre-Probable Cause Conciliation Agreement

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At the July 19, 2011 Executive Session, the Commission considered a recommendation from this Office to accept a conciliation agreement negotiated with the respondents in MUR 6257.

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Therefore, we recommend that the Commission accept the signed conciliation agreement, approve the appropriate letters, and close the file. We are circulating this memorandum on an expedited 72-hour tally vote

1 **RECOMMENDATIONS**

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1. Accept the signed conciliation agreement;
  2. Approve the appropriate letters; and
  3. Close the file.
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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
 Callahan, et al. (Pre-Probable Cause ) MUR 6257  
 Conciliation Agreement) )

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on August 17, 2011, the Commission decided by a vote of 6-0 to take the following actions in MUR 6257:

1. Accept the conciliation agreement, as recommended in the General Counsel's Memorandum dated July 26, 2011.
2. Approve the appropriate letters.
3. Close the file.

Commissioners Bauerly, Hunter, McGahn II, Petersen, Walther and Weintraub voted affirmatively for the decision.

Attest:

August 17, 2011  
 Date

Shawn Woodhead Werth  
 Shawn Woodhead Werth  
 Secretary and Clerk of the Commission

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

SEP - 8 2011

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Robert A. Gleason, Jr.  
P.O. Box 8  
Johnstown, PA 15907

RE: MUR 6257  
Callahan, *et al.*

Dear Mr. Gleason:

This is in reference to the complaint you filed with the Federal Election Commission (the "Commission") on February 25, 2010, concerning John Callahan, Friends of John Callahan and John V. Filipos, in his official capacity as treasurer, and Callahan for Congress and John V. Filipos, in his official capacity as treasurer. The Commission found reason to believe that John Callahan, Friends of John Callahan and John V. Filipos, in his official capacity as treasurer, and John Callahan for Congress and John V. Filipos, in his official capacity as treasurer, violated 2 U.S.C. § 441i(e) and 11 C.F.R. § 110.3(d), and reason to believe that John Callahan for Congress and John V. Filipos, in his official capacity as treasurer, violated 2 U.S.C. § 434(b)(3) and (4), provisions of the Federal Election Campaign Act of 1971, as amended. On August 17, 2011, a conciliation agreement signed by the respondents was accepted by the Commission. Accordingly, the Commission closed the file in this matter.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66132 (Dec. 14, 2009). A copy of the agreement with the Respondents is enclosed for your information.

If you have any questions, please contact me at (202) 694-1650.

Sincerely,

  
Wanda D. Brown  
Attorney

Enclosure  
Conciliation Agreement

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**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of	)	
	)	MUR 6257
John Callahan	)	
	)	
Callahan for Congress and John V. Filipos,	)	
in his official capacity as Treasurer;	)	
	)	
Friends of John Callahan and John V. Filipos,	)	
in his official capacity as Treasurer	)	

**CONCILIATION AGREEMENT**

This matter was initiated by an externally-generated complaint. The Federal Election Commission ("Commission") found reason to believe that John Callahan, Callahan for Congress and John V. Filipos, in his official capacity as Treasurer, (the "Federal Committee") and Friends of John Callahan and John V. Filipos, in his official capacity as Treasurer, (the "Mayoral Committee") (collectively "Respondents") violated 2 U.S.C. § 441i(e)(1)(A) and 11 C.F.R. § 110.3(d). The Commission also found reason to believe that the Federal Committee violated 2 U.S.C. § 434(b)(3) and (4).

NOW, THEREFORE, the Commission and Respondents, having participated in informal methods of conciliation prior to a finding of probable cause to believe, pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), do hereby agree as follows:

- I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding.
- II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. Respondents voluntarily enter into this agreement with the Commission.

1           IV.    The pertinent facts in this matter are as follows:

2                   1.    During 2009-2010, John Callahan was a candidate for the United  
3 States House of Representatives for Pennsylvania's 15<sup>th</sup> Congressional District. Callahan  
4 officially announced his federal candidacy on July 27, 2009. He filed his Statement of  
5 Candidacy with the Commission and designated his principal campaign committee on  
6 July 31, 2009. In 2009, John Callahan was simultaneously an unopposed candidate for  
7 mayor of Bethlehem, Pennsylvania, in both the primary and general elections.

8                   2.    Callahan for Congress and John V. Filipos, in his official capacity  
9 as treasurer, (the "Federal Committee") is a political committee within the meaning of  
10 2 U.S.C. § 431(4) and is Callahan's principal authorized federal committee.

11                  3.    Friends of John Callahan and John V. Filipos, in his official  
12 capacity as treasurer, (the "Mayoral Committee") is Callahan's mayoral campaign  
13 committee.

14                  4.    The Mayoral Committee made two payments totaling \$9,932 to  
15 vendor Stamford Campaigns for "opposition self-research." It made the first payment on  
16 May 6, 2009 for \$4,500 and the second payment on June 23, 2009 for \$5,432.

17                  5.    On January 15, 2010, the Federal Committee paid \$5,000 to  
18 the Mayoral Committee for the research and reported the disbursement on its 2010 April  
19 Quarterly Report.

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1                   6.     The Federal Election Campaign Act of 1971, as amended, (the  
2 "Act") prohibits a federal candidate, a candidate's agent and entities established,  
3 financed, maintained or controlled by them from soliciting, receiving, directing,  
4 transferring or spending funds in connection with a federal election, unless those funds  
5 are subject to the limitations, prohibitions and reporting requirements of the Act.  
6 2 U.S.C. § 441i(e)(1)(A).

7                   7.     The Act also prohibits transfers of funds or assets from a  
8 candidate's campaign committee or account for a non-federal election to his or her  
9 principal campaign committee or other authorized committee for a federal election.  
10 11 C.F.R. § 110.3(d). A candidate's federal campaign committee may, however,  
11 purchase goods from its non-federal campaign committee so long as the federal campaign  
12 committee pays the "usual and normal charge" for such goods. The Commission's  
13 regulations define "usual and normal charge" as the "price of those goods in the market  
14 from which they would have been purchased at the time of the contribution." 11 C.F.R.  
15 § 100.52(d)(2).

16                   8.     Each treasurer of a political committee shall file reports of receipts  
17 and disbursements which shall disclose the identification of each person or political  
18 committee whose contribution or contributions have an aggregate amount or value in  
19 excess of \$200 within the election cycle, together with the date and amount of any such  
20 contribution; and for the reporting period and the election cycle, the total amount of all  
21 disbursements. 2 U.S.C. § 434(b)(3) and (4).

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1                   9.     The Commission found reason to believe that the Mayoral  
2     Committee's provision of the research to the Federal Committee for \$5,000 was less than  
3     the usual and normal charge of \$9,932. As a result, the Commission found reason to  
4     believe that the Mayoral Committee made, and the Federal Committee accepted, a \$4,932  
5     contribution to the Federal Committee, which the Federal Committee did not disclose on  
6     its 2010 April Quarterly report filed with the Commission.

7                   10.    The Respondents contend that they acted on their good-faith  
8     belief and advice of counsel that because both the Mayoral Committee and the Federal  
9     Committee used the research, the Commission's regulations addressing the allocation of  
10    expenses made on behalf of more than one political committee were applicable to this  
11    expenditure. The Respondents further contend that they believed because the research  
12    had to be updated when the Federal Committee used it, the "usual and normal charge"  
13    was less than the full price paid by the Mayoral Committee. However, in order to resolve  
14    this matter without additional proceedings before the Commission and the additional  
15    expenditure of funds, Respondents will not contest the Commission's findings and have  
16    agreed to settle this matter.

17                V.     Respondents violated the Act in the following ways:

18                   1.     John Callahan and Friends of John Callahan and John V. Filipos,  
19     in his official capacity as treasurer, violated 2 U.S.C. § 441i(e) and 11 C.F.R. § 110.3(d)  
20     by receiving a payment of less than the usual and normal charge for research sold to  
21     Callahan for Congress and John V. Filipos, in his official capacity as treasurer.

22                   2.     John Callahan and Callahan for Congress and John V. Filipos, in  
23     his official capacity as treasurer, violated 2 U.S.C. § 441i(e)(1)(A) and 11 C.F.R.

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1 § 110.3(d) by paying less than the usual and normal charge for research purchased from  
2 Friends of John Callahan and John V. Filipos, in his official capacity as treasurer.

3 3. Callahan for Congress and John V. Filipos, in his official capacity  
4 as treasurer, violated 2 U.S.C. § 434(b)(3) and (4) by failing to disclose the contribution  
5 of \$4,932 that it received from John Callahan and Friends of John Callahan and John V.  
6 Filipos, in his official capacity as treasurer.

7 VI. Respondents will cease and desist from violating 2 U.S.C. § 441i(e)(1)(A)  
8 and 11 C.F.R. § 110.3(d), and Callahan for Congress and John V. Filipos, in his official  
9 capacity as treasurer, will cease and desist from violating 2 U.S.C. § 434(b)(3) and (4).

10 VII. Callahan for Congress and John V. Filipos, in his official capacity as  
11 treasurer, will reimburse \$4,932 to Friends of John Callahan and John V. Filipos, in his  
12 official capacity as treasurer, and will amend its disclosure reports filed with the  
13 Commission to accurately reflect such activity.

14 VIII. Respondents will pay a civil penalty of \$1,200 pursuant to 2 U.S.C.  
15 § 437g(a)(5)(A).

16 IX. The Commission, on request of anyone filing a complaint under  
17 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may  
18 review compliance with this agreement. If the Commission believes that this agreement  
19 or any requirement thereof has been violated, it may institute a civil action for relief in  
20 the United States District Court for the District of Columbia.

21 X. This agreement shall become effective as of the date that all parties hereto  
22 have executed same and the Commission has approved the entire agreement.

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1 XI. Respondents shall have no more than thirty (30) days from the date this  
2 agreement becomes effective to comply with and implement the requirements contained  
3 in this agreement and to so notify the Commission.

4 XII. This Conciliation Agreement constitutes the entire agreement between the  
5 parties on the matters raised herein, and no other statement, promise, or agreement, either  
6 written or oral, made by either party or by agents of either party, that is not contained in  
7 this written agreement shall be enforceable.

8 FOR THE COMMISSION:

9 Christopher Hughey  
10 Acting General Counsel

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13 BY: K. M. Guith  
14 Kathleen M. Guith  
15 Acting Associate General Counsel  
16 for Enforcement

8-19-11  
Date

19 FOR THE RESPONDENTS:

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Stephen Horowitz, Esq. Neil Reiff  
Counsel for John Callahan,  
Friends of John Callahan and John V. Filipos,  
in his official capacity as treasurer, and  
John Callahan for Congress and John V. Filipos,  
in his official capacity as treasurer

7/29/11  
Date

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