



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Hon. Kieran Michael Lalor  
P.O. Box 334  
Hopewell Junction, NY 12533

JAN -5 2016

RE: MUR 6965

Dear Mr. Lalor:

On December 3, 2015, the Federal Election Commission accepted the signed conciliation agreement with Warriors for Liberty and you, in your official capacity as treasurer, to resolve violations of 52 U.S.C. § 30104(b), a provision of the Federal Election Campaign Act of 1971. Accordingly, the file in this matter is now closed.

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); Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66,132 (Dec. 14, 2009). Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. *See* 2 U.S.C. § 437g(a)(4)(B).

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that, as specified in the agreement, the \$7,150 civil penalty is due within 30 days of the agreement's effective date. If you have any questions, please do not hesitate to contact me at (202) 694-1372.

Sincerely,

A handwritten signature in black ink that reads "Roy Lockett" with a stylized flourish at the end.

Roy Q. Lockett  
Attorney, Enforcement Division

Enclosure  
Conciliation Agreement

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 )  
Warriors for Liberty and ) MUR 6965  
Kieran Lalor in his )  
official capacity as treasurer )  
 )

**CONCILIATION AGREEMENT**

This matter was initiated pursuant to information ascertained by the Federal Election Commission (the "Commission") in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that Warriors for Liberty and Scott B. Mackenzie in his official capacity as treasurer ("Respondent" or the "Committee") violated 52 U.S.C. § 30104(b).

NOW, THEREFORE, the Commission and the Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 52 U.S.C. § 30109(a)(4)(A)(i).

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. The Committee is a multicandidate political committee registered with the Commission. Kieran Lalor is the Committee's current treasurer of record.

2. The Federal Election Campaign Act of 1971, as amended (the "Act"), requires committee treasurers to file reports of receipts and disbursements in accordance with the provisions of 52 U.S.C. § 30104. *See* 52 U.S.C. § 30104(a)(1); 11 C.F.R. § 104.1(a). These reports must include, *inter alia*, the total amount of receipts and disbursements, including the appropriate itemizations, where required. *See* 52 U.S.C. § 30104(b); 11 C.F.R. § 104.3(a)-(b).

3. Additionally, the Act and Commission regulations require political committees to disclose the amount and nature of outstanding debts and obligations until those debts are extinguished. 52 U.S.C. § 30104(b)(8); 11 C.F.R. §§ 104.3(d), 104.11(a). A political committee must file separate schedules for debts owed by and to the committee with a statement explaining the circumstances and conditions under which each debt and obligation was incurred or extinguished. *See* 11 C.F.R. § 104.11(a). A debt or obligation of \$500 or less must be reported as of the time that payment is made or within sixty days of the date on which the political committee incurs the debt, whichever comes first, and a debt exceeding \$500 must be disclosed in the report that covers the date on which the debt was incurred. 11 C.F.R. § 104.11(b).

4. On January 31, 2014, the Committee timely filed its 2013 Year-End Report covering the period from July 1, 2013, through December 31, 2013. The report disclosed no receipts, disbursements, or debts.

5. On February 21, 2014, the Committee filed an Amended 2013 Year-End Report that disclosed an additional \$241,026.52 in receipts, \$225,995.28 in disbursements, and \$125,519.20 in debts.

V. Respondent violated 52 U.S.C. § 30104(b) by failing to accurately disclose receipts, disbursements, and debts on its original 2013 Year-End Report.

VI. 1. Respondent will pay a civil penalty to the Commission in the amount of Seven Thousand One Hundred and Fifty Dollars (\$7,150) pursuant to 52 U.S.C. § 30109(a)(5)(A).

2. Respondent will cease and desist from committing violations of 52 U.S.C. § 30104(b).

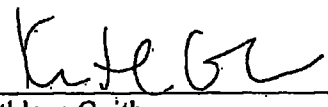
VII. The Commission, on request of anyone filing a complaint under 52 U.S.C. § 30109(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

IX. Respondent shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

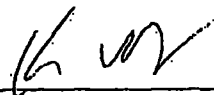
X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

BY:   
Kathleen Guith  
Acting Associate General Counsel  
for Enforcement

1-4-16  
Date

FOR THE RESPONDENT:

  
Kieran Lalor  
Treasurer

11/10/2015  
Date