



FEDERAL ELECTION COMMISSION
Washington, DC 20463

1 **MEMORANDUM**

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3 **TO:** The Commission

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5 **FROM:** Lisa Stevenson *LJS/kg*
6 Acting General Counsel

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8 Kathleen Guith *kmg*
9 Associate General Counsel for Enforcement

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11 Mark Shonkwiler *MS*
12 Assistant General Counsel

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14 Antoinette Fuoto *AF*
15 Staff Attorney

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17 **SUBJECT:** MUR 6920 (Government Integrity, LLC)

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19 **RE:** Office of the General Counsel's Notice to Commission and Respondents
20 Following the Submission of Probable Cause Briefs
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23 On September 21, 2017, the Office of the General Counsel ("OGC") notified
24 Government Integrity, LLC ("GI LLC") that it was prepared to recommend that the Commission
25 find probable cause to believe that GI LLC knowingly and willfully violated
26 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b)(1)(i) by making a contribution in the name of
27 another.¹ OGC's notification included a General Counsel's Brief setting forth the factual and
28 legal basis for the recommendation. On October 6, 2017, GI LLC submitted a reply brief.
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30 Pursuant to the Agency Procedure Following the Submission of Probable Cause Briefs by
31 the Office of General Counsel, 76 Fed. Reg. 63,570 (Oct. 13, 2011), OGC is hereby notifying the
32 Commission that it intends to proceed with the recommendation to find probable cause to believe
33 that GI LLC violated 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b)(1)(i) based on the factual and
34 legal analysis set forth in the General Counsel's Brief.
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36 A copy of this Notice is being provided to the Respondents at the same time that it is
37 circulated to the Commission.

¹ See 52 U.S.C. § 30109(a)(3); 11 C.F.R. § 111.16(a); see also Agency Procedure Following the Submission
of Probable Cause Briefs by the Office of General Counsel, 76 Fed. Reg. 63,570 (Oct. 13, 2011).

1 **RECOMMENDATION**

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Find probable cause to believe that Government Integrity, LLC knowingly and willfully violated 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b)(1)(i).

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