



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

August 26, 2021

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3 **TO:** The Commission  
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5 **FROM:** Lisa J. Stevenson *LS* by SG  
6 Acting General Counsel  
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8 Charles Kitcher *CK* by SG  
9 Associate General Counsel for Enforcement  
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11 Claudio J. Pavia *CP*  
12 Acting Assistant General Counsel  
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14 Saurav Ghosh *SG*  
15 Attorney  
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17 **SUBJECT:** MURs 7165 and 7196 (Jesse Benton)  
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19 **RE:** Office of General Counsel's Notice to the Commission  
20 Following the Submission of Probable Cause Briefs  
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23 On August 10, 2021, the Office of General Counsel ("OGC") notified counsel for Jesse  
24 Benton ("Respondent") that it was prepared to recommend that the Commission find probable  
25 cause to believe that Respondent knowingly and willfully violated 52 U.S.C. § 30121(a)(2) and  
26 11 C.F.R. § 110.20(g) by knowingly soliciting a contribution from a foreign national.<sup>1</sup> OGC's  
27 notification included a General Counsel's Brief setting forth the factual and legal basis for the  
28 recommendation. On August 26, 2021, Respondent 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 Respondent violated the Federal Election Campaign Act of 1971, as amended, based on the  
34 factual and legal analysis set forth in the General Counsel's Brief. A copy of this Notice is being  
35 provided to Respondent at the same time that it is circulated to the Commission.  
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37 For the reasons set forth in the General Counsel's Brief, the Commission should proceed  
38 with finding probable cause to believe that Respondent knowingly solicited a contribution from a  
39 foreign national.  
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<sup>1</sup> Email from Claudio Pavia, FEC, to Michael Columbo and David Warrington, Dhillon Law Group, Counsel for Jesse Benton (Aug. 10, 2021).

MURs 7165 and 7196 (Jesse Benton)  
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41 **RECOMMENDATION:**

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43 Find probable cause to believe that Jesse Benton knowingly and willfully violated  
44 52 U.S.C. § 30121(a)(2) and 11 C.F.R. § 110.20(g) by knowingly soliciting a  
45 contribution from a foreign national.