



FEDERAL ELECTION COMMISSION
Washington, DC 20463

June 11, 2021

VIA EMAIL

Eric Levine, Esq.
Eiseman Levine Lehrhaupt & Kakoyiannis, P.C.
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RE: MUR 7207
H. Russell Taub

Dear Mr. Levine:

On May 18, 2021, the Federal Election Commission (the "Commission") notified your client, H. Russell Taub, of alleged violations of the Federal Election Campaign Act of 1971, as amended (the "Act"), arising from a complaint filed with the Commission and provided your client with a copy of the complaint. Previously, on April 22, 2021, the Commission found reason to believe that an Unknown Congressional Candidate violated 52 U.S.C. § 30121(a) of the Act and 11 C.F.R. § 110.20(g) of the Commission's regulations, by knowingly soliciting, accepting, or receiving, a prohibited in-kind foreign national contribution. The Commission's notification letter of May 18, 2021, stated that the Commission was in possession of information indicating that H. Russell Taub may be the Unknown Congressional Candidate.

On June 10, 2021, the Commission voted to substitute the name H. Russell Taub in the place of Unknown Congressional Candidate in the Commission's previous findings in this matter. The Factual and Legal Analysis, which formed a basis for the Commission's finding with respect to your client, is enclosed for your information.

In order to expedite the resolution of this matter, the Commission has authorized the Office of the General Counsel to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Pre-probable cause conciliation is not mandated by the Act or the Commission's regulations, but is a voluntary step in the enforcement process that the Commission is offering to your client as a way to resolve this matter at an early stage and without the need for briefing the issue of whether or not the Commission should find probable cause to believe that your client violated the law.

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If your client is interested in engaging in pre-probable cause conciliation, please contact Amanda Andrade, the attorney assigned to this matter, at (202) 694-1343 within seven days of receipt of this letter. During conciliation, you may submit any factual or legal materials that you believe are relevant to the resolution of this matter. Because the Commission only enters into pre-probable cause conciliation in matters that it believes have a reasonable opportunity for settlement, we may proceed to the next step in the enforcement process if a mutually acceptable conciliation agreement cannot be reached within sixty days. *See* 52 U.S.C. § 30109(a), 11 C.F.R. Part 111 (Subpart A). Conversely, if your client is not interested in pre-probable cause conciliation, the Commission may conduct formal discovery in this matter or proceed to the next step in the enforcement process. Please note that once the Commission enters the next step in the enforcement process, it may decline to engage in further settlement discussions until after making a probable cause finding.

Please note that your client has 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. Pre-probable cause conciliation, extensions of time, and other enforcement procedures and options are discussed more comprehensively in the Commission's "Guidebook for Complainants and Respondents on the FEC Enforcement Process," which is available on the Commission's website at http://www.fec.gov/respondent_guide.pdf. Please be advised that, although the Commission cannot disclose information regarding an investigation to the public, it may share information on a confidential basis with other law enforcement agencies.¹ This matter will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) unless you notify the Commission in writing that your client wishes the matter to be made public.

¹ The Commission has the statutory authority to refer knowing and willful violations of the Act to the Department of Justice for potential criminal prosecution, 52 U.S.C. § 30109(a)(5)(C), and to report information regarding violations of law not within its jurisdiction to appropriate law enforcement authorities. *Id.* § 30107(a)(9).

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We look forward to your response.

On behalf of the Commission,

A handwritten signature in blue ink, reading "Shana M. Broussard". The signature is fluid and cursive, with the first name "Shana" and last name "Broussard" clearly legible.

Shana M. Broussard
Chair

Enclosures
Factual and Legal Analysis

FEDERAL ELECTION COMMISSION**FACTUAL AND LEGAL ANALYSIS**

RESPONDENT: H. Russell Taub

MUR: 7207

I. INTRODUCTION

On April 22, 2021, the Commission found reason to believe that an Unknown Congressional Candidate violated 52 U.S.C. § 30121(a) of the Federal Election Campaign Act of 1971, as amended (the “Act”), and 11 C.F.R. § 110.20(g) of the Commission’s regulations, by knowingly soliciting, accepting, or receiving a prohibited in-kind foreign national contribution in the form of opposition research related to the candidate’s opponent.

The Commission has established that the Unknown Congressional Candidate is H. Russell Taub, a 2016 candidate for Rhode Island’s 1st Congressional District. A screenshot of a Twitter direct message exchange shows that Taub contacted Guccifer 2.0 – a hacking persona claiming, at the time, to be Romanian but in fact controlled by the Russian Federation’s military intelligence agency – to request a “list of Republican donors” and explained that he would use the donor information to “raise some money to put against [his general election opponent David Cicilline].” Guccifer 2.0 instead responded with an offer to send a “dossier on cicilline . . . via email.” Taub provided his email address for receipt. Guccifer 2.0 sent ten documents relating to Cicilline, including professional research reports.

Taub did not submit a response to these allegations.

II. FACTUAL BACKGROUND

Official government reports, including those issued by the United States Intelligence Community and the Special Counsel for the Department of Justice, have uniformly concluded

1 that the Russian Federation engaged in a campaign to influence the 2016 election.¹ Allegations
 2 of Russian efforts to influence the 2016 election garnered significant attention and media
 3 coverage beginning around June 14, 2016, when the Democratic National Committee (“DNC”)
 4 publicly announced that it had been hacked and identified Russian military intelligence as the
 5 most likely culprit.² The next day, June 15, 2016, “Guccifer 2.0,” an online persona that
 6 purported to be a lone Romanian hacker,³ opened a WordPress blog and claimed responsibility
 7 for the DNC hacking.⁴ On its blog, Guccifer 2.0 published select documents hacked from the
 8 DNC, including an opposition research file on Donald Trump.⁵ Thereafter, Guccifer 2.0 posted
 9 thousands of additional stolen documents on its blog over several months.⁶ Also on June 15,
 10 2016, Guccifer 2.0 stated it had given the “main part” of the hacked documents to WikiLeaks.⁷
 11 About a month later, on July 22, 2016, WikiLeaks released a tranche of over 20,000 documents
 12 stolen from the DNC.⁸ On August 12, 2016, Guccifer 2.0 announced on its blog that it had

¹ See, e.g., OFFICE OF THE DIR. OF NAT’L INTELLIGENCE, INTELLIGENCE COMMUNITY ASSESSMENT: ASSESSING RUSSIAN ACTIVITIES AND INTENTIONS IN RECENT US ELECTIONS at ii, 1 (Jan. 6, 2017) (“Intelligence Community Assessment”); SPECIAL COUNSEL ROBERT S. MUELLER, III, U.S. DEP’T OF JUSTICE, REPORT ON THE INVESTIGATION INTO RUSSIAN INTERFERENCE IN THE 2016 PRESIDENTIAL ELECTION at 1, 4 (Mar. 22, 2019) (redactions partially removed on June 19 and November 2, 2020) (“Special Counsel’s Report”) (citations reference Volume 1); see also Indictment, *United States v. Netyksho, et al.*, 1:18-cr-00215 (D.D.C. July 13, 2018) (“Netyksho Indictment”).

² See Special Counsel’s Report at 42; Ellen Nakashima, *Russian Government Hackers Penetrated DNC, Stole Opposition Research on Trump*, WASH. POST, June 14, 2016; David E. Sanger and Nick Corasaniti, *D.N.C. Says Russian Hackers Penetrated its Files, Including Dossier on Donald Trump*, N.Y. TIMES, June 14, 2016.

³ Intelligence Community Assessment at 3; Special Counsel’s Report at 42; Lorenzo Franceschi-Bicchierai, *Here’s the Full Transcript of Our Interview with DNC Hacker ‘Guccifer 2.0,’* VICE, June 21, 2016 (“[Vice] ‘And where are you from?’ [Guccifer 2.0] ‘From Romania’”).

⁴ Special Counsel’s Report at 41, 43; Intelligence Community Assessment at 3.

⁵ Guccifer 2.0, *DNC’s Servers Hacked by Lone Hacker*, <https://web.archive.org/web/20160615212154/https://guccifer2.wordpress.com/2016/06/15/dnc/> (archived version from June 15, 2016) [hereinafter Guccifer 2.0, June 15, 2016 Blog Post].

⁶ Special Counsel’s Report at 43 n.147; Intelligence Community Assessment at 2-3.

⁷ Guccifer 2.0, June 15, 2016 Blog Post.

⁸ Special Counsel’s Report at 46.

hacked the Democratic Congressional Campaign Committee (“DCCC”).⁹ In addition to its blog, Guccifer 2.0 operated a Twitter account to communicate about its hacking activities.¹⁰ Guccifer 2.0’s Twitter page stated “my DM [Direct Message] is OPEN for EVERYONE!”¹¹

On May 17, 2017, the Deputy Attorney General appointed Robert S. Mueller III as Special Counsel to investigate the Russian Federation’s “efforts to interfere in the 2016 presidential election” and “links and/or coordination between the Russian government and individuals associated with the campaign of President Donald Trump.”¹² The Special Counsel determined, *inter alia*, that the Russian Federation’s Main Intelligence Directorate of the General Staff (“GRU”) hacked the computers and email accounts of various organizations related to the 2016 U.S. election, including the DNC and DCCC, and disseminated stolen materials through fictitious online personas, including Guccifer 2.0.¹³

The Special Counsel’s Report states that “on August 15, 2016, the Guccifer 2.0 persona sent a candidate for the U.S. Congress documents related to the candidate’s opponent.”¹⁴ More details on the interaction between Guccifer 2.0 and the unnamed candidate are described in the *Netyksho* indictment, which states: “On or about August 15, 2016, the Conspirators, posing as

⁹ Guccifer 2.0, *Guccifer 2.0 Hacked DCCC*, <https://web.archive.org/web/20160912021619/https://guccifer2.wordpress.com/2016/08/12/guccifer-2-0-hacked-dccc/> (archived version from September 12, 2016) [hereinafter Guccifer 2.0, August 12, 2016 Blog Post].

¹⁰ Guccifer 2.0 (@GUCCIFER_2) | Twitter, https://web.archive.org/web/20160815231439if_/https://twitter.com/GUCCIFER_2 (archived version of Twitter feed from August 15, 2016) [hereinafter Guccifer 2.0 Twitter Page]; see *Netyksho* Indictment ¶¶ 45(a), 64(b); Guccifer 2.0 August 12, 2016 Blog Post (providing link to Twitter account).

¹¹ Guccifer 2.0 Twitter Page (June 22, 2016).

¹² See Office of Deputy Att’y Gen., Order No. 3915-2017: *Appointment of Special Counsel to Investigate Russian Interference with the 2016 Presidential Election and Related Matters* (May 17, 2017).

¹³ Special Counsel’s Report at 36; see also *id.* at 42 (explaining factual circumstances that support the Department of Justice’s assessment that the GRU controlled the Guccifer 2.0 persona).

¹⁴ *Id.* at 43.

1 Guccifer 2.0, received a request for stolen documents from a candidate for the U.S. Congress.
 2 The Conspirators responded using the Guccifer 2.0 persona and sent the candidate stolen
 3 documents related to the candidate's opponent."¹⁵

4 The Commission has obtained documents establishing that H. Russell Taub was the
 5 candidate who contacted and received stolen documents from Guccifer 2.0 related to his
 6 opponent. Taub was the 2016 Republican candidate for Rhode Island's 1st Congressional
 7 District, and Russell Taub for Congress was his authorized committee.¹⁶ On August 15, 2016,
 8 Taub contacted the Guccifer 2.0 persona via Twitter direct message.

9 A transcript of the Twitter direct message conversation between Taub and Guccifer 2.0 is
 10 provided below. The original transcript indicates that the conversation was between Twitter ID
 11 numbers 1470814424 and 744912907515854848. Source code available for archived versions of
 12 their Twitter pages shows that the Twitter ID numbers belonged to @htaub814 or "H. Russell
 13 Taub" and @Guccifer_2 or "Guccifer 2.0."¹⁷ The "H. Russell Taub" account, which joined
 14 Twitter in May 2013, displayed a headshot of Taub as the profile picture, identified Taub as a
 15 "Candidate for 2016," and linked to "russforcongress2016.com."¹⁸ The "Guccifer 2.0" account

¹⁵ *Netyksho* Indictment ¶ 43(a) (charging Russian GRU officers with conspiracy to commit an offense against the United States).

¹⁶ H. Russell Taub, Statement of Candidacy (Feb. 11, 2015); Russell Taub for Congress, Statement of Org. (May 21, 2015).

¹⁷ <https://web.archive.org/web/20161111073521/https://twitter.com/htaub814> (archived version of @htaub814 Twitter page with metadata: data-user-id= "1470814424" data-screen-name="htaub814" data-name="H. Russell Taub") [hereinafter "H. Russell Taub Twitter Page"]; https://web.archive.org/web/20160815231439if/https://twitter.com/GUCCIFER_2 (archived version of @Guccifer_2 Twitter page with metadata: data-user-id= "744912907515854848" data-screen-name=" GUCCIFER_2" data-name="GUCCIFER 2.0").

¹⁸ Russell Taub Twitter Page.

is the same account identified by the Special Counsel as having been operated by the GRU, and it is the same account linked to in Guccifer 2.0's WordPress blog posts.¹⁹

As shown below, Taub sent a Twitter direct message to Guccifer 2.0, asking: "Can you get a list of Republican donors for me. I am running for office myself." Taub said, "I could use your help to defeat cicilline." He further explained that a donor list would help to "raise some money to put against [Cicilline] . . . if I had the resources I can win." Guccifer 2.0 replied, "it seems i have a dossier on cicilline . . . I can send u a dossier via email." Taub then provided the email address, info@russforcongress2016.com for receipt of the dossier.²⁰

Transcript of Taub/Guccifer 2.0 Twitter Conversation

User	Date/Time	Message
@htaub814 – "H. Russell Taub"	2016-08-15 12:54:08 PM (EST)	Can you get a list of Republican donors for me. I am running for office myself.
@Guccifer_2 – "Guccifer 2.0"	2016-08-15 02:19:38 PM (EST)	r u from rhode island?
@htaub814 – "H. Russell Taub"	2016-08-15 02:30:47 PM (EST)	Originally no nj
	2016-08-15 02:31:02 PM (EST)	But I could use your help to defeat cicilline
@Guccifer_2 – "Guccifer 2.0"	2016-08-15 02:34:19 PM (EST)	how republican donors list would help u?
	2016-08-15 02:34:38 PM (EST)	i'll have a look at what i have
@htaub814 – "H. Russell Taub"	2016-08-15 02:36:25 PM (EST)	I raise some money to put against him. He think he is a God and he thinks he is unbeatable but if I had the resources I can win. And I am only 28 to.
@Guccifer_2 – "Guccifer 2.0"	2016-08-15 02:37:59 PM (EST)	ho, it seems i have a dossier on cicilline
	2016-08-15 03:35:13 PM (EST)	i can send u a dossier via email
	2016-08-15 03:35:24 PM (EST)	do u have a pgp key?
@htaub814 – "H. Russell Taub"	2016-08-15 03:54:14 PM (EST)	Sept 13, info@russforcongress2016.com

About 15 minutes later, "Guccifer2 <guccifer2@protonmail.com>" sent an email to info@russforcongress2016.com with a zipped file named "Cicilline_David.7z.". Two days later,

¹⁹ Guccifer 2.0 August 12, 2016 Blog Post; Special Counsel's Report at 46; *Netyksho* Indictment ¶ 45(a).

²⁰ The Commission is in possession of information that the email address "info@russforcongress2016" was registered to "Harold Taub" with the recovery email: htaub814@gmail.com.

1 on August 17, 2016, guccifer2@protonmail.com sent the files again but not in the compressed
2 format.

3 The August 17, 2016 email from Guccifer 2.0 to Taub included 10 attachments, all of
4 which were documents related to Cicilline, apparently stolen from the GRU's various election-
5 related hacking targets. Among the attached documents were three professionally-produced
6 opposition research reports on Cicilline. The first was a 206-page self-opposition "Research
7 Report" prepared by Walsworth Landset Research for "Team Cicilline," which highlighted
8 "vulnerabilities that Cicilline may encounter during his re-election campaign in 2012."²¹ It
9 provided an overview of Cicilline's political career, described his voting patterns, and analyzed
10 Cicilline's background and position on nearly three dozen major issues. The second was a 45-
11 page self-opposition research "Vulnerability Report" prepared for Cicilline for Congress by 3rd
12 Coast Research in May 2010.²² It analyzed "Top Attacks" against Cicilline on numerous issues
13 and provided in-depth background information about Cicilline. The report states that it is "an
14 internal document and is not intended for public review or circulation." The third is a 68-page
15 "Polling Memo," dated April 26, 2010 and addressed to the "Lynch campaign." In 2010,

²¹ The Cicilline Committee paid Walsworth Landset Research \$15,000 during the 2012 cycle, shortly before and after the date of this report, for "Research" and "Research Services." Cicilline Committee, April 2012 Quarterly Rpt. at 172 (Apr. 15, 2012); Cicilline Committee, July 2012 Quarterly Rpt. at 204 (July 15, 2012). Between 2011 and 2020, 57 federal political committees reported numerous disbursements totaling \$1,233,259 to Walsworth Landset Research for "Research Consulting," "Research," "Research Services," "Opposition Research," among other similar purposes. https://www.fec.gov/data/disbursements/?data_type=processed&recipient_name=Walsworth+Landset+Research+.

²² The Cicilline Committee paid 3rd Coast Research \$19,313 during the 2010 cycle, shortly before or after the date of this report, for "Research." Cicilline Committee, July 2010 Quarterly Rpt. at 193 (July 15, 2010); Cicilline Committee, 2012 Pre-Primary Rpt. at 102 (Dec. 8, 2010). Between 2007 and 2013, 24 federal political committees reported disbursements totaling \$325,686 to 3rd Coast Research for "Research," "Research Fees," "Opposition Research," and "Campaign Research," among other similar purposes. https://www.fec.gov/data/disbursements/?data_type=processed&recipient_name=3rd+Coast+Research

Cicilline faced several candidates in the Democratic primary, including Bill Lynch.²³ The report summarizes Cicilline’s background and provides commentary on where Cicilline might be vulnerable to attacks.

The remaining materials consist of three documents with polling data from the 2010 election cycle, including the results of a “Master Questionnaire” apparently conducted by The Feldman Group, Inc. on behalf of the Cicilline Committee in September 2010.²⁴ There are also news articles related to Cicilline and one of Cicilline’s U.S. House of Representatives Financial Disclosure Statements.

III. LEGAL ANALYSIS

The Act and Commission regulations prohibit any “foreign national” from directly or indirectly making a contribution or donation of money or other thing of value in connection with a federal, state, or local election.²⁵ Moreover, the Act and Commission regulations prohibit any person from knowingly soliciting, accepting, or receiving any such contribution or donation from a foreign national.²⁶ A “contribution” includes “any gift, subscription, loan, advance, or deposit

²³ The report also identifies Cicilline as Lynch’s opponent. *See also* William J. Lynch, Statement of Candidacy (Feb. 22, 2010) (listing Democratic party affiliation and candidacy in Rhode Island’s 1st Congressional District). During the 2010 election cycle, Bill Lynch for Congress paid \$25,000 for “Research” and “Research Services” to The Maccabee Group. Bill Lynch for Congress, 2010 Pre-Primary Rpt. at 38 (Sept. 2, 2010); Bill Lynch for Congress, April 2010 Quarterly Rpt. at 54 (Apr. 15, 2010); Bill Lynch for Congress, 2010 July Quarterly Rpt. at 44-45 (July 15, 2010). The primary election for Rhode Island’s First Congressional District was held on September 14, 2010.

²⁴ The Cicilline Committee paid \$338,940 to The Feldman Group during the 2010 cycle, including payments of \$15,330 for “Research Expense” and \$33,842 for “Benchman (Polling)” shortly before and after the date of the polling data. Cicilline Committee, Amended 2010 Pre-Primary Rpt. at 158 (Dec. 8, 2010); Cicilline Committee, 2010 October Quarterly Rpt. at 166 (Oct. 15, 2010); https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00476564&recipient_name=the+feldman+group.

²⁵ 52 U.S.C. § 30121(a)(1)(A); 11 C.F.R. § 110.20(b); *see also* 52 U.S.C. § 30121(b) (defining “foreign national” to include an individual who is not a citizen or national of the United States and who is not lawfully admitted for permanent residence, as well as a “foreign principal” as defined at 22 U.S.C. § 611(b), which, in turn, includes “a government of a foreign country”).

²⁶ 52 U.S.C. § 30121(a)(2); 11 C.F.R. § 110.20(g).

1 of money or anything of value made by any person for the purpose of influencing any election
 2 for Federal office.”²⁷ Under Commission regulations, “anything of value” includes all in-kind
 3 contributions, which include “the provision of any goods or services without charge or at a
 4 charge that is less than the usual and normal charge for such goods or services.”²⁸

5 Based on the available information, it appears that Taub solicited, accepted, and received
 6 prohibited in-kind foreign national contributions. First, the information Taub initially solicited,
 7 but did not receive, from Guccifer 2.0, “a list of Republican donors,” is a thing of value. The
 8 Commission has long recognized that “mailing lists are assets that have value,” and therefore the
 9 “list of Republican donors” solicited by Taub is a thing of value falling within that precedent.²⁹

10 Second, the information that Taub ultimately accepted and received from Guccifer 2.0,
 11 namely three research reports, were also things of value. In MUR 6414 (Carnahan), the
 12 Commission found that a committee’s receipt of investigative or opposition research services
 13 without paying the usual or normal charge may result in an in-kind contribution.³⁰ As described
 14 above, Guccifer 2.0 sent Taub three research reports, two of which were prepared by commercial
 15 research services at the Cicilline campaign’s expense.³¹ The third may have also been prepared
 16 by a commercial research service and was nonetheless of professional quality.³² These
 17 documents, which provide in-depth analysis on how Cicilline might be vulnerable to attacks and

²⁷ 52 U.S.C. § 30101(8)(A).

²⁸ 11 C.F.R. § 100.52(d).

²⁹ Advisory Op. 2014-06 (Ryan, *et al.*) at 8; *see* Advisory Op. 2014-09 (REED Marketing) at 4 n.6; Advisory Opinion 2011-02 (Brown) at 7-8; Advisory Op. 2002-14 (Libertarian Nat’l Comm.) at 5; Advisory Op. 1982-46 (Dellums) at 2.

³⁰ *See* Factual & Legal Analysis at 13-20, MUR 6414 (Carnahan) (dismissing because of the low amount in violation).

³¹ *Supra* notes 21-22 and accompanying text.

³² *Supra* note 23 and accompanying text.

1 summarize Cicilline’s background, are commercial products of the sort routinely prepared by
2 professional vendors on behalf of Congressional campaigns. Indeed, Commission reports
3 suggest that the vendors who originally prepared these reports were compensated for their
4 work.³³ Additionally, the materials included polling data, which the Commission has also
5 determined to be a thing of value.³⁴

6 Commission regulations require that a person must “knowingly” solicit a foreign
7 national, and define knowingly to mean, *inter alia*, that a person must “[b]e aware of facts that
8 would lead a reasonable person to conclude that there is a substantial probability” that the person
9 being solicited is a foreign national.³⁵ It appears that the facts known to Taub at the time of his
10 solicitation, acceptance, and receipt of the stolen documents should have led him to reasonably
11 conclude he was communicating with a foreign national. By August 2016, when Taub contacted
12 Guccifer 2.0, there had been widespread public reports attributing election hacking to Russian
13 state-sponsored actors, specifically the DNC hacking — for which Guccifer 2.0 had claimed
14 responsibility.³⁶ Guccifer 2.0 denied a Russian connection, but claimed to be Romanian,³⁷ and
15 thus was presumptively a foreign national and a prohibited source. Under these circumstances,

³³ *Supra* notes 21-23.

³⁴ See 11 C.F.R. § 106.4(b) (“The purchase of opinion poll results by a political committee or other person not authorized by a candidate to make expenditures and the subsequent acceptance of the poll results by a candidate or a candidate’s authorized political committee or agent or by another unauthorized political committee is a contribution in-kind by the purchaser to the candidate or other political committee and an expenditure by the candidate or other political committee.”).

³⁵ 11 C.F.R. § 110.20(a)(4)(ii).

³⁶ *Supra* notes 3-7 and accompanying text.

³⁷ *Supra* note 3 and accompanying text.

1 any person seeking out Guccifer 2.0 for assistance would have likely concluded that there was a
2 substantial probability the source was a foreign national.³⁸

3 Therefore, based on record before the Commission, it appears that Taub violated
4 52 U.S.C. § 30121(a) and 11 C.F.R. § 110.20(g) by knowingly soliciting, accepting, and
5 receiving, prohibited in-kind foreign national contributions.

³⁸ 11 C.F.R. § 110.20(a)(4)(ii).