



FEDERAL ELECTION COMMISSION

Washington, DC 20463

June 1, 2021

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Charles Kitcher
Acting Associate General Counsel
for Enforcement

BY: Jin Lee *JL*
Acting Assistant General Counsel

Claudio Pavia *CP*
Acting Assistant General Counsel

Amanda Andrade *AA*
Attorney

SUBJECT: MURs 7207, 7268, 7274, and 7623 (Russian Federation, *et al.*) – Revised Factual & Legal Analyses for the Russian Federation, Internet Research Agency, and Unknown Congressional Candidate and Recommendation to Close the File

On April 22, 2021, the Commission voted, *inter alia*, to dismiss the Russian Federation and Internet Research Agency pursuant to *Heckler v. Chaney*, 470 U.S. 821 (1985), and find reason to believe that an Unknown Congressional Candidate violated 52 U.S.C. § 30121(a) and 11 C.F.R. § 110.20(g).¹ Further, the Commission directed the Office of General Counsel to draft the appropriate Factual and Legal Analyses for these Respondents.²

Attached are revised Factual and Legal Analyses for the Russian Federation and Internet Research Agency

¹ Certification ¶¶ 4(a), (c) (Apr. 26, 2021).

² *Id.* ¶ 4(e).

MURs 7207, 7268, 7274, and 7623 (Russian Federation, *et al.*)

Memorandum to the Commission

Page 2 of 2

Also attached is a draft Factual and Legal Analysis for the Unknown Congressional Candidate

Finally, because the Unknown Congressional Candidate is only a Respondent in MUR 7207 and represents a discrete piece of the overall allegations in these matters, the Office of the General Counsel recommends that the Commission sever the allegations as to the Unknown Congressional Candidate and open a new MUR as to him or her. We further recommend that the Commission close the file in MURs 7207, 7268, 7274, and 7623, and send the appropriate letters.

RECOMMENDATIONS:

- 1) Approve the attached Factual and Legal Analyses;
- 2) Open a new MUR with the Unknown Congressional Candidate as the Respondent;
- 3) Close the file in MURs 7207, 7268, 7274, and 7623; and
- 4) Send the appropriate letters.