



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

**VIA ELECTRONIC MAIL**

March 24, 2021

Amanda La Forge, Esq.  
Sandler Reiff Lamb Rosenstein & Birkenstock, P.C.  
1090 Vermont Avenue, NW, Suite 750  
Washington, DC 20005  
laforge@sandlerreiff.com

RE: MUR 7271

Dear Ms. La Forge:

On January 13, 2021, the Office of General Counsel (“OGC”) sent you a General Counsel’s Brief setting forth the factual and legal basis upon which OGC was prepared to recommend that the Federal Election Commission (the “Commission”) find probable cause to believe that your clients, Alexandra Chalupa and Chalupa & Associates, LLC, violated the Federal Election Campaign Act of 1971, as amended. Specifically, the Brief recommended that the Commission find probable cause to believe that your clients violated 52 U.S.C. § 30121(a)(2) and 11 C.F.R. § 110.20(g). You filed a Reply Brief on March 15, 2021.

Pursuant to the *Agency Procedure Following the Submission of Probable Cause Briefs by the Office of General Counsel*, 76 Fed. Reg. 63,570 (Oct. 13, 2011), OGC is notifying the Commission that it intends to proceed with the probable cause recommendation based on the factual and legal analysis set forth in the General Counsel’s Brief. I have enclosed a copy of OGC’s Notice to the Commission for your records.

Should you have any questions, please contact me at (202) 694-1475.

Sincerely,

*Laura Conley*  
Laura Conley  
Attorney

Enclosure

Office of General Counsel’s Notice to the Commission



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

March 23, 2021

**TO:** The Commission

**FROM:** Lisa J. Stevenson *LJS* by SG  
Acting General Counsel

Charles Kitcher *CK* by SG  
Acting Associate General Counsel for Enforcement

Jin Lee *JL*  
Acting Assistant General Counsel

Claudio J. Pavia *CP*  
Acting Assistant General Counsel

Saurav Ghosh *Sg*  
Attorney

Laura Conley *LC*  
Attorney

**SUBJECT:** MUR 7271 (Chalupa, *et al.*)

**RE:** Office of General Counsel's Notice to the Commission  
Following the Submission of Probable Cause Briefs

On January 13, 2021, the Office of General Counsel (“OGC”) notified counsel for Alexandra Chalupa and Chalupa & Associates, LLC (“Respondents”) that it was prepared to recommend that the Commission find probable cause to believe that Respondents violated 52 U.S.C. § 30121(a)(2) and 11 C.F.R. § 110.20(g) by knowingly soliciting an in-kind contribution from a foreign national.<sup>1</sup> OGC’s notification included a General Counsel’s Brief setting forth the factual and legal basis for the recommendation. On March 15, 2021, Respondents submitted a Reply Brief.

Pursuant to the *Agency Procedure Following the Submission of Probable Cause Briefs by the Office of General Counsel*, 76 Fed. Reg. 63,570 (Oct. 13, 2011), OGC is hereby notifying the Commission that it intends to proceed with the recommendation to find probable cause to believe that Respondents violated the Federal Election Campaign Act of 1971, as amended, based on the

<sup>1</sup> Email from Saurav Ghosh, FEC, to Amanda La Forge, Sandler Reiff Lamb Rosenstein & Birkenstock, P.C., Counsel for Chalupa and Chalupa & Associates, LLC (Jan. 13, 2021).

MUR 7271 (Chalupa, *et al.*)

OGC Notice

Page 2 of 2

41 factual and legal analysis set forth in the General Counsel's Brief. A copy of this Notice is being  
42 provided to Respondents at the same time that it is circulated to the Commission.

43

44 For the reasons set forth in the General Counsel's Brief, the Commission should proceed  
45 with finding probable cause to believe that Respondents knowingly solicited an in-kind  
46 contribution from a foreign national.

47

48 **RECOMMENDATION:**

49

50 Find probable cause to believe that Alexandra Chalupa and Chalupa & Associates, LLC,  
51 violated 52 U.S.C. § 30121(a)(2) and 11 C.F.R. § 110.20(g) by knowingly soliciting an  
52 in-kind contribution from a foreign national.