



FEDERAL ELECTION COMMISSION

Washington, D.C. 20463

1 February 23, 2022

2 **MEMORANDUM**

3 **TO:** The Commission

4 **FROM:** Lisa J. Stevenson
5 Acting General Counsel

6 Charles Kitcher
7 Associate General Counsel for Enforcement

8 **BY:** Mark Allen *MA*
9 Assistant General Counsel

10 Richard L. Weiss *MA for RW*
11 Attorney

12 **SUBJECT:** MURs 7291 and 7449
13 (DNC Services Corp./Democratic National Committee, *et al.*)
14 Recommendation to Close the File

22 **I. DISCUSSION**

23 On February 17, 2022, the Commission accepted negotiated conciliation agreements
24 with the DNC Services Corporation/Democratic National Committee and Virginia McGregor in
25 her official capacity as treasurer ("the DNC") and Hillary for America and Elizabeth Jones in
26 her official capacity as treasurer ("HFA").¹ At that time, we told the Commission that additional
27 recommendations would be forthcoming regarding the remaining allegations and other
28 respondents. We now make those recommendations.

29 In addition to the Committees' reporting violations that are the subject of the conciliation
30 agreements, the Complaints made allegations regarding the solicitation, making and receipt of
31 foreign national contributions by Christopher Steele, Fusion GPS, Perkins Coie, Marc Elias and
32 HFA.² At the time the Commission found reason to believe as to the DNC and HFA regarding

1 See Certification ("Cert.") ¶¶ 1-2 (Feb. 22, 2022).

2 See First Gen. Counsel's Rpt. at 29-40.

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1 the Committees' reporting, it took no action as the other allegations and respondents.³ The First
2 General Counsel's Report concluded that the record did not support the allegations,⁴ and we did
3 not learn any additional information during our investigation or conciliation negotiations.
4 Therefore, we recommend that the Commission dismiss the remaining allegations and close the
5 files.

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7 **II. RECOMMENDATIONS**

- 8 1. Dismiss the allegation that Christopher Steele violated 52 U.S.C. § 30121 and
9 11 C.F.R. § 110.20(b), (f) (g), and (i);
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11 2. Dismiss the allegation that Marc Elias and Perkins Coie LLP and Hillary for America
12 and Elizabeth Jones in her official capacity as treasurer violated 52 U.S.C. § 30121
13 and 11 C.F.R. § 110.20(b) and (h)(1);
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15 3. Dismiss the allegation that Fusion GPS violated 52 U.S.C. § 30121 and 11 C.F.R.
16 § 110.20;
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16 4. Approve the appropriate letters; and
17
17 5. Close the files.

³ See Cert. ¶ 2.c-e, (July 23, 2019).

⁴ *Id.* at 33-40.