



**FEDERAL ELECTION COMMISSION**

Washington, D.C. 20463

February 23, 2022

**MEMORANDUM**

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4 **TO:** The Commission  
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6 **FROM:** Lisa J. Stevenson  
7 Acting General Counsel  
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9 Charles Kitcher  
10 Associate General Counsel for Enforcement  
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12 **BY:** Mark Allen *MA*  
13 Assistant General Counsel  
14  
15 Richard L. Weiss *MA for RW*  
16 Attorney  
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18 **SUBJECT:** MURs 7291 and 7449  
19 (DNC Services Corp./Democratic National Committee, *et al.*)  
20 Recommendation to Close the File  
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23 **I. DISCUSSION**  
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25 On February 17, 2022, the Commission accepted negotiated conciliation agreements  
26 with the DNC Services Corporation/Democratic National Committee and Virginia McGregor in  
27 her official capacity as treasurer (“the DNC”) and Hillary for America and Elizabeth Jones in  
28 her official capacity as treasurer (“HFA”).<sup>1</sup> At that time, we told the Commission that additional  
29 recommendations would be forthcoming regarding the remaining allegations and other  
30 respondents. We now make those recommendations.  
31

32 In addition to the Committees’ reporting violations that are the subject of the conciliation  
33 agreements, the Complaints made allegations regarding the solicitation, making and receipt of  
34 foreign national contributions by Christopher Steele, Fusion GPS, Perkins Coie, Marc Elias and  
35 HFA.<sup>2</sup> At the time the Commission found reason to believe as to the DNC and HFA regarding

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<sup>1</sup> See Certification (“Cert.”) ¶¶ 1-2 (Feb. 22, 2022).

<sup>2</sup> See First Gen. Counsel’s Rpt. at 29-40.

MURs 7291 and 7449 (DNC Services Corp./Democratic National Committee, *et al.*)

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1 the Committees' reporting, it took no action as the other allegations and respondents.<sup>3</sup> The First  
2 General Counsel's Report concluded that the record did not support the allegations,<sup>4</sup> 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.

## 6 **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);
- 10  
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);
- 14 3. Dismiss the allegation that Fusion GPS violated 52 U.S.C. § 30121 and 11 C.F.R.  
15 § 110.20;
- 16 4. Approve the appropriate letters; and
- 17 5. Close the files.

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<sup>3</sup> See Cert. ¶ 2.c-e, (July 23, 2019).

<sup>4</sup> *Id.* at 33-40.