



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

1 **MEMORANDUM**  
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3 **TO:** The Commission  
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5 **FROM:** Lisa J. Stevenson  
6 Acting General Counsel  
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8 Charles Kitcher  
9 Acting Associate General Counsel for Enforcement  
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11 **BY:** Stephen Gura *SG*  
12 Deputy Associate General Counsel for Enforcement  
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14 Lynn Y. Tran *Lgt by SG*  
15 Assistant General Counsel  
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17 Saurav Ghosh *SG*  
18 Attorney  
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20 **SUBJECT:** MURs 7350 and 7351 (Christopher Wylie, *et al.*)  
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22 **RE:** Circulation of Discovery Documents  
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25 On July 24, 2019, the Commission found reason to believe that Christopher Wylie  
26 violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(i) by directly or indirectly participating in  
27 the administration of a U.S. political committee or in a decision-making process in connection  
28 with a committee's election-related spending, and authorized the use of compulsory process.<sup>1</sup>

29 Our investigation in this matter is focused on determining whether Cambridge  
30 Analytica LLC ("Cambridge"), while providing services to U.S. political committees,  
31 employed foreign nationals in roles that involved directly or indirectly participating in the  
32 administration of a U.S. political committee or in a decision-making process in connection  
33 with a committee's election-related spending. Cambridge has declared bankruptcy in the U.S.,  
34 and its affiliated/parent company, SCL Group LTD, is analogously "in administration" in the  
35 United Kingdom; neither company has records or former employees that we can readily access.

<sup>1</sup> Certification ¶¶ 2 and 8, MURs 7350 and 7351 (July 24, 2019).

1 We therefore do not expect to be able to obtain information from Cambridge directly, within  
2 the time we have remaining under the statute of limitations.<sup>2</sup>

3 Wylie, however, was reportedly part of Cambridge from its inception and has publicly  
4 claimed to have first-hand knowledge regarding Cambridge's activities during the 2014  
5 election cycle, when he was employed there. We therefore believe we can obtain information  
6 from him to further the investigation into his and Cambridge's alleged violations of the Act  
7 and Commission regulations. To that end, the attached subpoena seeks information from  
8 Wylie to allow us to determine the extent to which foreign nationals working for Cambridge  
9 provided services to U.S. political committees.

10 We have attempted to locate Wylie to request this information voluntarily, but we have  
11 not been able to reach him. We believe that Wylie is represented by counsel in connection with  
12 U.K. and U.S. investigations into Cambridge's activity — although he did not designate counsel  
13 in these matters before the Commission — but numerous messages to his counsel have not been  
14 returned. As such, we are still in the process of finding a current mailing address, contact email,  
15 or phone number for Wylie.<sup>3</sup> However, because this matter is seriously imperiled by the statute  
16 of limitations, even as we continue our efforts to find Wylie, we request that the Commission  
17 approve the attached subpoena for him on a 48-hour no objection basis.

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<sup>2</sup> The statute of limitations began running on June 10, 2019.

<sup>3</sup> Publicly available information indicates that Wylie is employed as Director of Research for the Stockholm-based fashion retailer Hennes & Mauritz (H&M), and spends time in multiple cities, including London, New York, Los Angeles, and Stockholm.