



**THE FEDERAL ELECTION COMMISSION**  
Washington, DC 20002

1 **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 Acting Associate General Counsel for Enforcement

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12 **BY:** Stephen Gura *SG*  
13 Deputy Associate General Counsel

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15 Jin Lee *JL*  
16 Acting Assistant General Counsel

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18 Ray Wolcott *RLW*  
19 Attorney

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21 **SUBJECT:** MUR 7437 (Randy Bryce for Congress, *et al.*)  
22 Revised Factual and Legal Analysis and Proposed Conciliation Agreement  
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25 On May 6, 2021, the Commission found reason to believe that Randy Bryce and Randy  
26 Bryce for Congress and John Tate, III, in his official capacity as treasurer violated 52 U.S.C.  
27 § 30114(b)(1).<sup>1</sup> The Commission was equally divided on whether to exercise its prosecutorial  
28 discretion to dismiss the remaining allegations related to a loan that Bryce received from his  
29 campaign manager.<sup>2</sup> The Commission authorized the Office of General Counsel (“OGC”) to  
30 enter into pre-probable cause conciliation with Respondents and directed OGC to revise the  
31 Factual and Legal Analysis (“F&LA”) and proposed Conciliation Agreement (“CA”).<sup>3</sup>

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<sup>1</sup> MUR 7347 Cert. (May 12, 2021).

<sup>2</sup> MUR 7437 Cert. (May 18, 2021).

<sup>3</sup> MUR 7347 Cert. (May 12, 2021).

MUR 7437 (Randy Bryce for Congress, et al.)

Memorandum to the Commission

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3 **RECOMMENDATIONS**

- 4           1. Approve the attached revised Factual and Legal Analysis; and  
5           2. Approve the attached revised proposed Conciliation Agreement.

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