



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

October 27, 2021

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2 **TO:** The Commission  
3  
4 **FROM:** Lisa J. Stevenson *LJS*  
5 Acting General Counsel  
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7 Charles Kitcher *CK*  
8 Associate General Counsel for Enforcement  
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10 Jin Lee *JL*  
11 Acting Assistant General Counsel  
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13 Justine A. di Giovanni *JAG*  
14 Attorney  
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16 **SUBJECT:** MUR 7465 (Freedom Vote, Inc.)  
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18 **RE:** Office of General Counsel's Notice to the Commission  
19 Following the Submission of Probable Cause Brief  
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22 **I. INTRODUCTION**

23 On September 20, 2021, the Office of General Counsel ("OGC") notified counsel for  
24 Freedom Vote, Inc., ("Freedom Vote" or "Respondent") that it was prepared to recommend that  
25 the Commission find probable cause to believe that Freedom Vote violated 52 U.S.C. §§ 30102,  
26 30103, and 30104(a), (b), and (g)(2) by failing to organize, register, and report as a political  
27 committee.<sup>1</sup> OGC's notification included a General's Counsel's Brief setting forth the factual  
28 and legal basis for the recommendation.<sup>2</sup> Respondent submitted a Reply Brief on October 5,  
29 2021, in which it requested a Probable Cause Hearing,<sup>3</sup> which was held on October 14, 2021.<sup>4</sup>  
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31 Pursuant to the *Agency Procedure Following the Submission of Probable Cause Briefs by*  
32 *the Office of General Counsel*, 76 Fed. Reg. 63,570 (Oct. 13, 2011), OGC is hereby notifying the  
33 Commission that it intends to proceed with the recommendation to find probable cause to believe

<sup>1</sup> Letter from Justine A. di Giovanni, Att'y, FEC, to Charles Spies, Couns. for Freedom Vote (Sept. 20, 2021) (enclosing GC Br.).

<sup>2</sup> *Id.*

<sup>3</sup> Reply Br. (Oct. 5, 2021).

<sup>4</sup> PC Hr'g Tr. (Oct. 14, 2021).

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OGC Notice

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1 that Freedom Vote violated the Federal Election Campaign Act of 1971, as amended, based on  
2 the factual and legal analysis set forth in the General Counsel's Brief. A copy of this Notice is  
3 being provided to the Respondent at the same time that it is circulated to the Commission.  
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5 For the reasons set forth in the General Counsel's Brief, the Commission should proceed  
6 with finding probable cause to believe that Freedom Vote failed to organize, register, and report  
7 as a political committee.  
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9 **II. RECOMMENDATION:**

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11 Find probable cause to believe that Freedom Vote violated 52 U.S.C. §§ 30102,  
12 30103, and 30104(a), (b), and (g)(2) by failing to organize, register, and report as  
13 a political committee.