



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

**MEMORANDUM**

**TO:** The Commission

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

Charles Kitcher  
Acting Associate General Counsel for Enforcement

**BY:** Stephen Gura *sg*  
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Attorney

**RE:** MUR 7587 (Sanders *et al.*) – Recommendation to Approve Factual and Legal Analysis – 48 Hour Tally

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On March 9, 2021, the Commission found reason to believe that Senator Bernard Sanders, Bernie 2016 and Susan Jackson in her official capacity as treasurer, and Bernie 2020 and Lora Haggard in her official capacity as treasurer violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(g) and (i).<sup>1</sup> The Commission also approved a conciliation agreement and authorized this Office to enter into pre-probable cause conciliation with Sanders and his committees.<sup>2</sup>

Part 3.d. of the Certification reflects that the Commission approved the Factual and Legal Analyses circulated by the Vice Chair's office on March 8. Those F&LAs concerned other respondents who were to be dismissed from MUR 7587 and the related matter, 7712. The F&LA for Sanders and his committees, however, was not included in that email.

<sup>1</sup> Certification, MUR 7587, Part 3.a. (April 7, 2021).

<sup>2</sup> *Id.*, Part 3.b, c.

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In order to proceed to pre-probable cause conciliation with Sanders and his committees, we recommend that the Commission approve the attached Factual and Legal Analysis for Sanders and his committees, originally circulated November 1, 2019, as revised.

**RECOMMENDATION:**

1. Approve the attached Factual and Legal Analysis for Senator Bernard Sanders, Bernie 2016 and Susan Jackson in her official capacity as treasurer, and Bernie 2020 and Lora Haggard in her official capacity as treasurer.