



FEDERAL ELECTION COMMISSION
Washington, DC 20463

CERTIFIED AND ELECTRONIC MAIL
RETURN RECEIPT REQUESTED

March 15, 2022

klma@factdc.org

Kendra Arnold
Foundation for Accountability and Civic Trust
1717 K Street, NW
Suite 900
Washington, DC 20006

RE: MUR 7717

Dear Ms. Arnold:

The Federal Election Commission has considered the allegations contained in your complaint dated March 18, 2020, and amendment thereto dated June 9, 2020, but was equally divided on whether to find reason to believe that SMP and Rebecca Lambe in her official capacity as treasurer violated 52 U.S.C. §§ 30116(a)(1)(A) and 30118(a) and 11 C.F.R. § 110.1(b)(1) by making excessive and prohibited in-kind contributions to Theresa Greenfield for Iowa and 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(b) by failing to report the in-kind contributions. There was also an insufficient number of votes to dismiss pursuant to the Commission's prosecutorial discretion under *Heckler v. Chaney* the allegations, and an insufficient number of votes to find no reason to believe, that SMP and Rebecca Lambe in her official capacity as treasurer violated 52 U.S.C. § 30116(a)(1)(A) and 11 C.F.R. § 110.1(b)(1), and 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(b). Finally, there was an insufficient number of votes to find no reason to believe that Theresa Greenfield and Theresa Greenfield for Iowa and Theresa Kehoe in her official capacity as treasurer violated 52 U.S.C. § 30116(f) and 11 C.F.R. § 110.9 and 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(a). Accordingly, on March 8, 2022, the Commission closed its file in this matter.

Documents related to the case will be placed on the public record within 30 days. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016). A Statement of Reasons providing a basis for the Commission's decision will follow.

MUR 7717
Letter to Kendra Arnold
Page 2

The Federal Election Campaign Act of 1971, as amended, allows a complainant to seek judicial review of the Commission's dismissal of this action. *See* 52 U.S.C. § 30109(a)(8). If you have any questions, please contact Thaddeus H. Ewald, the attorney assigned to this matter, at (202) 694-1650 or tewald@fec.gov.

Sincerely,

Lisa J. Stevenson
Acting General Counsel

Mark Allen

By: Mark Allen
Assistant General Counsel