



FEDERAL ELECTION COMMISSION
Washington, DC 20463

March 15, 2022

BY ELECTRONIC MAIL ONLY

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Marc E. Elias, Esq.
Ezra W. Reese, Esq.
Rebecca K. Mears, Esq.
Elias Law Group, LLP
10 G Street, NE
Suite 600
Washington, DC 20002

RE: MUR 7717
SMP and Rebecca Lambe in her
official capacity as treasurer

Dear Messrs. Elias and Reese and Ms. Mears:

On March 18, 2020, and June 9, 2020, the Federal Election Commission notified your client, SMP and Rebecca Lambe in her official capacity as treasurer, of complaints alleging violations of the Federal Election Campaign Act of 1971, as amended. Copies of the complaints were forwarded to your client at the time. On March 8, 2022, the Commission considered the complaints, but was equally divided on whether to find reason to believe that your client 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 your client 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). Accordingly, the Commission closed its file in the 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.

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Letter to Marc E. Elias, Esq., Ezra W. Reese, Esq., & Rebecca K. Mears, Esq.

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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,

Mark Allen

Mark Allen
Assistant General Counsel