



FEDERAL ELECTION COMMISSION

Washington, D.C. 20463

March 24, 2022

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Charles Kitcher
Associate General Counsel for Enforcement

Claudio J. Pavia
Acting Deputy General Counsel for Enforcement

BY: Mark Allen *MA*
Assistant General Counsel

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SUBJECT: MUR 7727 (Sara Gideon, *et al.*)
Recommendation to Reopen the File to Include Respondent Candidate in Findings
and Factual and Legal Analysis

I. DISCUSSION

On March 8, 2022, the Commission found no reason to believe that Majority Forward violated 52 U.S.C. § 30116(a) and 11 C.F.R. § 110.2(b) by making an excessive contribution.¹ The Commission further found no reason to believe that Sara Gideon for Maine and Lisa Lunn in her official capacity as treasurer violated 52 U.S.C. § 30116(f) and 11 C.F.R. § 110.9 by knowingly accepting an excessive contribution.² The Commission approved the Factual and Legal Analysis, as recommended in the First General Counsel's Report dated October 19, 2020, subject to the edits last circulated by Chairman Dickerson's Office on March 1, 2022, at 3:36 p.m. and accordingly approved the appropriate letters and closed the file.³

¹ Certification ¶ 2(a) (Mar. 14, 2022).

² *Id.* ¶ 2(b).

³ *Id.* ¶ 2(c-e).

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1 While preparing the closing letters and reviewing the certification of the vote, the Office
2 of General Counsel noticed an oversight in that we failed to include Respondent Sara Gideon in
3 the recommendations, or the findings as stated in Factual and Legal Analysis. Therefore, we
4 recommend that the Commission reopen the file, find no reason to believe that Sara Gideon
5 violated 52 U.S.C. § 30116(f) and 11 C.F.R. § 110.9 by knowingly accepting an excessive
6 contribution, rescind the Factual and Legal Analysis, and approve the attached revised Factual
7 and Legal Analysis.

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9 **II. RECOMMENDATIONS**

- 10 1. Reopen MUR 7727;
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12 2. Find no reason to believe that Sara Gideon violated 52 U.S.C. § 30116(f) and
13 11 C.F.R. § 110.9 by knowingly accepting an excessive contribution;
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15 3. Rescind the Factual and Legal Analysis approved on March 8, 2022;
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17 4. Approve the attached Factual and Legal Analysis;
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19 5. Approve the appropriate letters; and
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21 6. Close the file.
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