



**FEDERAL ELECTION COMMISSION**  
Washington, D.C. 20463

November 10, 2021

**VIA CERTIFIED**  
**AND ELECTRONIC MAIL**  
**RETURN RECEIPT REQUESTED**

Stuart McPhail  
Citizens for Responsibility and Ethics in Washington  
1101 K Street, NW, Suite 201  
Washington, DC 20005  
smcphail@citizensforethics.org

RE: MUR 7859

Dear Mr. McPhail:

The Federal Election Commission considered the allegations contained in your complaint dated November 20, 2020, but was equally divided on whether to dismiss the matter pursuant to the expiration of the statute of limitations. The Commission also was divided on whether to dismiss, as a matter of prosecutorial discretion, the allegations that Citizens for a Working America violated 52 U.S.C. §§ 30102, 30103, and 30104 and find no reason to believe that Joel Riter and Norman Cummings violated 52 U.S.C. §§ 30102, 30103, and 30104. Accordingly, on October 28, 2021, the Commission closed the 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). One or more Statement of Reasons explaining the Commission's decision may follow.

The Federal Election Campaign Act of 1971, as amended, allows a complainant to seek judicial review of the Commission's action. *See* 52 U.S.C. § 30109(a)(8). If you have any questions, please contact Ray Wolcott, the attorney assigned to this matter, at (202) 694-1302 or [rwolcott@fec.gov](mailto:rwolcott@fec.gov).

Sincerely,

Lisa Stevenson  
Acting General Counsel

*Anne B. Robinson*

BY: Anne B. Robinson  
Acting Assistant General Counsel