

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) PRE-MUR 607
Crystal Run Healthcare, LLP; Hal)
Teitelbaum; Michelle Koury; Eric)
Barbanel; Zewditu Bekele-Arcuri; Rosa)
Cirillo; Robert Dinsmore; Wael)
Fakhoury; William Gotsis; Lezode)
Kipoliongo; Florence Lazaroff; Michael)
Miller; Jonathan Nassar; Laura Nicoll;)
Manuel Perry; Emmanuel Schenkman;)
Gurvinder Sethi; Sandeep Singh)

CERTIFICATION

I, Vicktoria J. Allen, recording secretary of the Federal Election Commission executive session, do hereby certify that on January 28, 2021, the Commission took the following actions in the above-captioned matter:

1. Failed by a vote of 3-3 to:
 - a. Open a MUR.
 - b. Find reason to believe that Crystal Run Healthcare, LLP, violated 52 U.S.C. § 30122 by making contributions in the names of others.
 - c. Find reason to believe that Crystal Run Healthcare, LLP, violated 52 U.S.C. § 30116(a) by making excessive contributions.
 - d. Find reason to believe that Hal Teitelbaum and Michelle Koury violated 52 U.S.C. § 30122 by allowing their names to be used to make reimbursed contributions.
 - e. Dismiss the allegations that Eric Barbanel, Zewditu Bekele-Arcuri, Rosa Cirillo, Robert Dinsmore, Wael Fakhoury, William Gotsis, Lezode Kipoliongo, Florence Lazaroff, Michael Miller, Jonathan

Nassar, Laura Nicoll, Manuel Perry, Emmanuel Schenkman, Gurvinder Sethi, and Sandeep Singh violated 52 U.S.C. § 30122 by allowing names to be used to make reimbursed contributions, but issue letters of caution.

- f. Enter into conciliation with Crystal Run Healthcare, LLP, Hal Teitelbaum, and Michelle Koury prior to a finding of probable cause.
- g. Approve the Factual and Legal Analyses, as recommended in the First General Counsel's Report dated December 19, 2019, subject to edits circulated by the Office of General Counsel on January 25, 2021 at 5:46pm.
- h. Approve the Conciliation Agreements, as recommended in the First General Counsel's Report dated December 19, 2019.
- i. Approve the appropriate letters.

Commissioners Broussard, Walther, and Weintraub voted affirmatively for the motion.

Commissioners Cooksey, Dickerson, and Trainor dissented.

2. **Decided by a vote of 5-0** to:

- a. Open a MUR. **MUR 7878**
- b. Find reason to believe that Crystal Run Healthcare, LLP, violated 52 U.S.C. § 30122 by making contributions in the names of others.
- c. Find reason to believe that Crystal Run Healthcare, LLP, violated 52 U.S.C. § 30116(a) by making excessive contributions.
- d. Find reason to believe that Hal Teitelbaum and Michelle Koury violated 52 U.S.C. § 30122 by allowing their names to be used to make reimbursed contributions.
- e. Dismiss the allegations that Eric Barbanel, Zewditu Bekele-Arcuri, Rosa Cirillo, Robert Dinsmore, Wael Fakhoury, William Gotsis, Lezode Kipoliongo, Florence Lazaroff, Michael Miller, Jonathan Nassar, Laura Nicoll, Manuel Perry, Emmanuel Schenkman, Gurvinder Sethi, and Sandeep Singh violated 52 U.S.C. § 30122 by allowing names to be used to make reimbursed contributions.

- f. Enter into conciliation with Crystal Run Healthcare, LLP, Hal Teitelbaum, and Michelle Koury prior to a finding of probable cause.
- g. Approve the Factual and Legal Analyses, as recommended in the First General Counsel's Report dated December 19, 2019, subject to edits circulated by the Office of General Counsel on January 25, 2021 at 5:46pm.
- h. Approve the Conciliation Agreements, as recommended in the First General Counsel's Report dated December 19, 2019.
- i. Approve the appropriate letters.

Commissioners Broussard, Cooksey, Dickerson, Trainor, and Weintraub voted affirmatively for the decision. Commissioner Walther abstained.

Attest:



Vicktoria Allen

Digitally signed by Vicktoria Allen
Date: 2021.02.11 19:35:43 -05'00'

Vicktoria J. Allen
Acting Deputy Secretary of the
Commission