



FEDERAL ELECTION COMMISSION

MEMORANDUM


TO: The Commission


FROM: Lisa J. Stevenson
Acting General Counsel

Charles Kitcher
Acting Associate General Counsel for Enforcement

Stephen Gura
Deputy Associate General Counsel for Enforcement

DATE: February 24, 2021

BY: Jin Lee 
Acting Assistant General Counsel

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Attorney

SUBJECT: MUR 7878 (Crystal Run Healthcare, LLP, *et al.*) Pre-Probable Cause Conciliation

On January 28, 2021, the Commission found reason to believe that Crystal Run Healthcare, LLP (“Crystal Run”) violated 52 U.S.C. §§ 30116(a)(1) and 30122 by making excessive contributions and contributions in the name of another. The Commission also found reason to believe that Hal Teitelbaum and Michelle Koury violated 52 U.S.C. § 30122 by permitting their names to be used for reimbursed contributions. The Commission authorized the Office of the General Counsel to engage in pre-probable cause conciliation with the Respondents.

We

therefore recommend that the Commission accept the signed conciliation agreements with the respondents and close the file.

MUR 7878 (Crystal Run Healthcare, LLP, *et al.*)

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RECOMMENDATIONS:

1. Accept the attached conciliation agreements;
2. Approve the appropriate letters; and
3. Close the file.