



**FEDERAL ELECTION COMMISSION**  
Washington, DC

December 11, 2023

**MEMORANDUM**

**TO:** The Commission

**FROM:** Lisa J. Stevenson  
Acting General Counsel

Charles Kitcher  
Associate General Counsel  
for Enforcement

Adrienne Baranowicz  
Deputy Associate General Counsel  
for Enforcement

Mark Allen  
Assistant General Counsel

**BY:** Aaron Rabinowitz  
Assistant General Counsel *AR*

**Subject:** MUR 7894R (Georgia Republican Party)  
Recommendation to Authorize Limited Investigation

On October 17, 2023, the Commission found reason to believe that the Georgia Republican Party, Inc., and Laurie L. McClain in her official capacity as treasurer (the “Committee”), violated 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(a) (b) by failing to report receipts and disbursements.<sup>1</sup> On October 19, 2023, the Commission directed the Office of the General Counsel (“OGC”) to “prepare a draft conciliation agreement for the Committee

<sup>2</sup> The Commission then approved a proposed Conciliation Agreement on November 1, 2023.<sup>3</sup>

<sup>1</sup> Cert. (Oct. 17, 2023).

<sup>2</sup> Cert. ¶ 3 (Oct. 23, 2023).

<sup>3</sup> Cert. (Nov. 2, 2023).

MUR 7894R (Georgia Republican Party)

Memorandum to the Commission

Page 2

[REDACTED] OGC believes we have exhausted all reasonable avenues to obtain an accurate estimate of the costs at issue directly from the Committee. OGC has also engaged in its own independent efforts to understand the costs at issue based on publicly available information, including materials submitted by TTV in connection with various lawsuits, but we have been unable to generate a reasonable estimate. Given the importance of ensuring accurate disclosure of the expenditures at issue here in conformity with the district court's order [REDACTED]

[REDACTED] OGC is recommending that the Commission authorize a limited investigation for the sole purpose of directly contacting TTV to ask that it disclose the amounts spent in connection with its activities in the 2021 Georgia Senate runoff election.

Given TTV's representations to the Committee, we further recommend that the Commission approve the attached subpoena to TTV that requests this information. However, should the Commission prefer, OGC could also proceed through an informal request to TTV in the first instance. Given the limited nature of the proposed investigation and the unique disposition of this matter, OGC requests that the Commission waive the requirement to submit an investigation plan pursuant to Directive 74. While OGC does not foresee a reason to need to expand the investigation beyond this question, OGC will not do so in any case before requesting approval to expand the scope of the investigation from the Commission.

### **RECOMMENDATIONS**

1. Authorize the use of compulsory process;

MUR 7894R (Georgia Republican Party)

Memorandum to the Commission

Page 3

2. Approve the attached subpoena;
3. Waive the requirement to submit an investigation plan pursuant to Directive 74.

