



FEDERAL ELECTION COMMISSION
Washington, DC 20463

July 25, 2023

VIA EMAIL

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Charles R. Spies, Esq.
Katherine N. Reynolds, Esq.
Dickinson Wright PLLC
1825 Eye Street, NW Suite 900
Washington, DC 20006

RE: MUR 7938
Greitens for US Senate and Eric Greitens
in his official capacity as treasurer
Greitens for Missouri
Eric R. Greitens

Dear Mr. Spies and Ms. Reynolds:

On November 3, 2021, the Federal Election Commission notified your clients, Greitens for US Senate and Eric Greitens in his official capacity as treasurer (the "Committee"), Greitens for Missouri, Eric R. Greitens, of a complaint alleging violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was included in that notification. On December 8, 2021, we received your clients' response to the complaint.

On July 13, 2023, the Commission found, on the basis of the information in the complaint, and information provided by your clients, no reason to believe that the Committee, Greitens for Missouri, and Greitens violated 52 U.S.C. § 30125 and 11 C.F.R. § 110.3(d) by using state committee funds to pay for federal testing-the-waters expenses with respect to the disbursements identified in the complaint other than those to the Octavian Group. The Commission also found no reason to believe that the Committee violated 52 U.S.C. § 30104(b) by failing to report federal testing-the-waters expenses with respect to the disbursements identified in the complaint other than those to the Octavian Group.

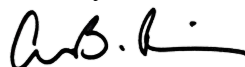
Further, the Commission exercised its prosecutorial discretion and dismissed the allegations that the Committee, Greitens for Missouri, and Greitens violated 52 U.S.C. § 30125 and 11 C.F.R. § 110.3(d) by using state committee funds to pay for federal testing-the-waters expenses with respect to the disbursements to the Octavian Group and exercised its prosecutorial discretion and dismissed the allegations that the Committee violated 52 U.S.C. § 30104(b) by failing to report federal testing-the-waters expenses with respect to the disbursements to the Octavian Group.

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The Commission also found no reason to believe that Greitens, the Committee, and Greitens for Missouri violated 52 U.S.C. § 30125(e) and 11 C.F.R. § 110.3(d) by transferring the Greitens website from Greitens for Missouri to the Committee without paying fair market value and found no reason to believe that the Committee violated 52 U.S.C. § 30104(b) by misreporting the transfer of the Greitens Website as an in-kind contribution from Greitens in disclosure reports filed with the Commission. Finally, the Commission found no reason to believe that the Committee, Greitens, and Greitens for Missouri violated 52 U.S.C. § 30122 by making, allowing, and knowingly accepting a contribution in the name of another related to the transfer of the Greitens website. Accordingly, the Commission closed the file in this matter. A Statement of Reasons providing a basis for the Commission's decision will follow.

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). If you have any questions, please contact me at (202) 694-1650.

Sincerely,



Anne B. Robinson
Assistant General Counsel