



FEDERAL ELECTION COMMISSION
Washington, DC 20463

VIA FIRST CLASS MAIL

August 18, 2021

LaMonica Herbst & Maniscalco, LLP
3305 Jerusalem Avenue
Wantagh, NY 11793

RE: MUR 7268
Cambridge Analytica, LLC

Dear Sir/Madam:

On July 2, 2020, the Federal Election Commission notified you of a complaint alleging that your client, Cambridge Analytica, LLC, had violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on April 22, 2021, voted to dismiss the allegations as they pertain to your client. The Factual and Legal Analysis, which more fully explains the Commission's decision, is enclosed for your information.

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 Nicholas Bamman, the attorney assigned to this matter, at (202) 694-1650 or nbamman@fec.gov.

Sincerely,

A handwritten signature in blue ink that reads "Claudio Pavia".

Claudio Pavia
Acting Assistant General Counsel

Enclosure:
Factual and Legal Analysis

1 **FEDERAL ELECTION COMMISSION**
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3 **FACTUAL AND LEGAL ANALYSIS**
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7 RESPONDENT: Cambridge Analytica, LLC

MUR: 7268

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9 **I. INTRODUCTION**

10 The Complaint in this matter alleges that Cambridge Analytica, LLC, a former political
11 consulting company, provided illegally sourced social profiles to the Russian Federation.¹ The
12 allegation here is vague, speculative, and unsupported by the available information. Therefore,
13 the Commission dismisses the allegation that Cambridge Analytica, LLC, violated the Act, as
14 alleged.

15 **II. FACTUAL BACKGROUND**

16 Cambridge Analytica, LLC was a limited liability company organized in Delaware on
17 December 31, 2013.² Its parent company, SCL Group LTD, was based in England and
18 registered in the United Kingdom on July 20, 2005.³ Cambridge reportedly began working for
19 political committees in the United States during the 2014 election cycle, which continued
20 through the 2016 election cycle.⁴

21 The Supplemental Complaint in MUR 7268 alleges that “Cambridge Analytica . . .
22 provided illegally sourced social profiles to the Russians as reported in the British investigation

¹ Supp. Compl. at 1, MUR 7268 (Jan. 16, 2020) (“Supp. Compl.”).

² Cambridge Analytica LLC, Delaware Div. of Corps., <https://icis.corp.delaware.gov/ecorp/entitysearch/NameSearch.aspx> (viewed Feb. 18, 2021).

³ SCL Group Limited, U.K. Companies House Registration, Company No. 05514098, <https://beta.companieshouse.gov.uk/company/05514098> (last visited Feb. 18, 2021).

⁴ Craig Timberg and Tom Hamburger, *Former Cambridge Analytica Workers Say Firm Sent Foreigners to Advise U.S. Campaigns*, WASH. POST (Mar. 25, 2018).

1 of Cambridge Analytica.”⁵ The Supplemental Complaint does not provide any additional
2 information regarding the allegation or cite to a particular source.⁶

3 **III. LEGAL ANALYSIS**

4 The Supplemental Complaint in MUR 7268 does not provide any factual basis in support
5 of its allegation that Cambridge Analytica “provided illegally sourced social profiles to the
6 Russians”⁷ and we are not aware of any source that otherwise supports this allegation.

7 Therefore, because the Supplemental Complaint is vague, speculative, and unsupported by the
8 available information, the Commission dismisses the allegation that Cambridge Analytica, LLC
9 violated the Act, as alleged.

⁵ Supp. Compl. at 1.

⁶ The term “British investigation” may be a reference to an investigation conducted by the Information Commissioner’s Office of the United Kingdom into Cambridge Analytica, LLC. *See* Ltr from Elizabeth Denham CBE, UK Information Commissioner, to Julian Knight MP, Chair, Digital, Cultural and Media Sport Select Comm., House of Commons (Oct. 2, 2020) (announcing the findings of investigation into Cambridge Analytica, LLC’s alleged “use of personal information and political influence”), *available at* https://ico.org.uk/media/action-weve-taken/2618383/20201002_ico-o-ed-l-rtl-0181_to-julian-knight-mp.pdf. The Information Commissioner’s Office “referred details of reported possible Russia-located activity to access data linked to the investigation to the National Crime Agency,” but the findings as stated in the October 2, 2020, report do not describe any specifics or otherwise corroborate the Supplemental Complaint’s claim that Cambridge Analytica provided illegally sourced social profiles to Russian actors. *See id.* at 3.

⁷ Supp. Compl. at 1.