FEDERAL ELECTION COMMISSION

Washington, DC 20463

June 1, 2021

<u>MEMORANDUM</u>

TO: The Commission

FROM: Lisa J. Stevenson
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                  Charles Kitcher
                  Acting Associate General Counsel
                    for Enforcement

BY: Jin Lee
                  Acting Assistant General Counsel

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SUBJECT: MURs 7207, 7268, 7274, and 7623 (Russian Federation, *et al.*) – Revised Factual
                  & Legal Analyses for the Russian Federation, Internet Research Agency, and
                  Unknown Congressional Candidate and Recommendation to Close the File

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On April 22, 2021, the Commission voted, *inter alia*, to dismiss the Russian Federation and Internet Research Agency pursuant to *Heckler v. Chaney*, 470 U.S. 821 (1985), and find reason to believe that an Unknown Congressional Candidate violated 52 U.S.C. § 30121(a) and 11 C.F.R. § 110.20(g).[1] Further, the Commission directed the Office of General Counsel to draft the appropriate Factual and Legal Analyses for these Respondents.[2]

Attached are revised Factual and Legal Analyses for the Russian Federation and Internet Research Agency

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[1]   Certification ¶¶ 4(a), (c) (Apr. 26, 2021).

[2]   *Id.* ¶ 4(e).

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Also attached is a draft Factual and Legal Analysis for the Unknown Congressional Candidate

Finally, because the Unknown Congressional Candidate is only a Respondent in MUR 7207 and represents a discrete piece of the overall allegations in these matters, the Office of the General Counsel recommends that the Commission sever the allegations as to the Unknown Congressional Candidate and open a new MUR as to him or her. We further recommend that the Commission close the file in MURs 7207, 7268, 7274, and 7623, and send the appropriate letters.

RECOMMENDATIONS:

1) Approve the attached Factual and Legal Analyses;

2) Open a new MUR with the Unknown Congressional Candidate as the Respondent;

3) Close the file in MURs 7207, 7268, 7274, and 7623; and

4) Send the appropriate letters.