

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURs 7313, 7319 and 7379
Michael D. Cohen; Donald J. Trump;)
Donald J. Trump for President, Inc., and)
Bradley T. Crate in his official capacity)
as treasurer; Trump Organization, LLC)
Trump Tower Commercial, LLC)
Timothy Jost; Essential Consultants, LLC)

CERTIFICATION

I, Vicktoria J. Allen, recording secretary of the Federal Election Commission executive session, do hereby certify that on February 23, 2021, the Commission took the following actions in the above-captioned matter:

1. Failed by a vote of 2-2 to:

MURs 7313 and 7319

- a. Find reason to believe that Donald J. Trump knowingly and willfully violated 52 U.S.C. § 30116(f) by knowingly accepting excessive contributions from Michael D. Cohen.
- b. Find reason to believe that Donald J. Trump knowingly and willfully violated 52 U.S.C. § 30118(a) by knowingly accepting a corporate contribution from the Trump Organization OR knowingly and willfully violated 52 U.S.C. § 30116(f) by knowingly accepting an excessive contribution from the Trump Organization.
- c. Find reason to believe that Donald J. Trump for President, Inc., and Bradley T. Crate in his official capacity as treasurer knowingly and willfully violated 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(a) and (b) by filing false disclosure reports with the Commission.

- d. Find reason to believe that Donald J. Trump for President, Inc., and Bradley T. Crate in his official capacity as treasurer knowingly and willfully violated 52 U.S.C. § 30116(f) by knowingly accepting excessive contributions from Michael D. Cohen.
- e. Find reason to believe that Donald J. Trump for President, Inc., and Bradley T. Crate in his official capacity as treasurer knowingly and willfully violated 52 U.S.C. § 30118(a) by knowingly accepting a corporate contribution from the Trump Organization OR knowingly and willfully violated 52 U.S.C. § 30116(f) by knowingly accepting an excessive contribution from the Trump Organization.
- f. Find reason to believe that Trump Organization, LLC, knowingly and willfully violated 52 U.S.C. § 30118(a) by making a corporate contribution OR knowingly and willfully violated 52 U.S.C. § 30116(a)(1)(A) by making an excessive contribution.
- g. Authorize the use of compulsory process.

MUR 7319

- h. Take no action at this time with respect to Timothy Jost.
- i. Dismiss the allegations with respect to Trump Tower Commercial, LLC.

MUR 7379

- j. Dismiss the allegations that Michael D. Cohen, Donald J. Trump, and Donald J. Trump for President, Inc., and Bradley T. Crate in his official capacity as treasurer violated 52 U.S.C. § 30114(b) by converting campaign funds to personal use through payments for Michael Cohen's legal fees with respect to the activities with respect to Ms. Clifford.

MURs 7313, 7319, and 7379

- k. Direct the Office of General Counsel to draft an appropriate Factual and Legal Analyses that reflect these findings and in so doing omit reference to Advisory Opinion 2008-17 (KITPAC).
- l. Approve the appropriate letters.

Commissioners Broussard and Weintraub voted affirmatively for the motion.

Commissioners Cooksey and Trainor dissented. Commissioner Walther was not present and did not vote. Commissioner Dickerson was recused and did not vote.

2. Failed by a vote of 2-3 to:
 - a. Dismiss the allegations against all respondents.
 - b. Issue appropriate letters.
 - c. Close the file.

Commissioners Cooksey and Trainor voted affirmatively for the motion. Commissioners Broussard, Walther, and Weintraub dissented. Commissioner Dickerson was recused and did not vote.

Attest:



March 31, 2021

Date

Vicktoria Allen

Digitally signed by Vicktoria Allen
Date: 2021.03.31 10:57:58 -04'00'

Vicktoria J. Allen
Acting Deputy Secretary of the
Commission

BEFORE THE FEDERAL ELECTION COMMISSION

| | | |
|---|---|--------------------------------|
| In the Matter of |) | |
| |) | MURs 7324, 7332, 7364 and 7366 |
| Donald J. Trump for President, Inc and |) | |
| Bradley T. Crate in his official capacity |) | |
| as treasurer; Donald J. Trump; A360 |) | |
| Media, LLC f/k/a American Media, Inc.; |) | |
| David J. Pecker; Michael D. Cohen; |) | |
| Dylan Howard; Timothy Jost |) | |

CERTIFICATION

I, Vicktoria J. Allen, recording secretary of the Federal Election Commission executive session, do hereby certify that on March 11, 2021, the Commission took the following actions in the above-captioned matter:

MURs 7324, 7332, 7364, and 7366

1. Failed by a vote of 3-3 to:
 - a. Find reason to believe that A360 Media, LLC f/k/a American Media, Inc. and David J. Pecker knowingly and willfully violated 52 U.S.C. § 30118(a) by making and consenting to prohibited corporate in-kind contributions.
 - b. Find reason to believe that Donald J. Trump for President, Inc. and Bradley T. Crate in his official capacity as treasurer knowingly and willfully violated 52 U.S.C. § 30118(a) by knowingly accepting prohibited contributions.
 - c. Find reason to believe that Donald J. Trump for President, Inc. and Bradley T. Crate in his official capacity as treasurer knowingly and willfully violated 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(a) and (b) by failing to report the required information with the Commission.

Federal Election Commission
 Certification for MURs 7324, 7332, 7364, and 7366
 March 11, 2021

Page 2

- d. Find reason to believe that Donald J. Trump knowingly and willfully violated § 30118(a) by knowingly accepting prohibited contributions.
- e. Take no action at this time as to the allegations that Michael D. Cohen violated the Act and Commission regulations.

MURs 7324 and 7366

- f. Name and notify Dylan Howard as a Respondent.

MURs 7332 and 7364

- g. Find reason to believe that Dylan Howard knowingly and willfully violated 52 U.S.C. § 30118(a) by making and consenting to prohibited corporate in-kind contributions.

MUR 7366

- h. Take no action at this time as to the allegations that Timothy Jost violated the Act and Commission regulations.

MURs 7324, 7332, 7364, and 7366

- i. Approve the Factual and Legal Analyses, as recommended in the First General Counsel's Report dated December 4, 2020, subject to the edits circulated by Commissioner Weintraub's Office on February 22, 2021 at 12:41 p.m.
- j. Authorize the use of compulsory process.
- k. Approve the appropriate letters.

Commissioners Broussard, Walther, and Weintraub voted affirmatively for the motion.

Commissioners Cooksey, Dickerson, and Trainor dissented.

MURs 7324, 7332, and 7366

- 2. Decided by a vote of 6-0 to:
 - a. Find reason to believe that A360 Media, LLC f/k/a American Media, Inc. and David J. Pecker knowingly and willfully violated 52 U.S.C. § 30118(a) by making and consenting to prohibited corporate in-kind contributions with regard to payments related to Karen McDougal.

Federal Election Commission
Certification for MURs 7324, 7332, 7364, and 7366
March 11, 2021

Page 3

- b. Enter into conciliation with A360 Media, LLC f/k/a American Media, Inc. and David J. Pecker prior to a finding of probable cause to believe
- c. Direct the Office of General Counsel to circulate a proposed Conciliation Agreement.
- d. Approve the Factual and Legal Analysis, as recommended in the First General Counsel's Report dated December 4, 2020, subject to the edits circulated by Commissioner Cooksey's Office on March 8, 2021 at 4:39 p.m.
- e. Approve the appropriate letters.

Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

MURs 7324, 7332, and 7366

3. Failed by a vote of 3-3 to:

- a. Dismiss allegations that A360 Media, LLC f/k/a America Media, Inc. and David J. Pecker knowingly and willfully violated 52 U.S.C. § 30118(a) by making and consenting to prohibited corporate in-kind contributions with regard to payments related to Dino Sajudin.
- b. Dismiss the allegations against Donald J. Trump for President, Inc., Bradley T. Crate, in his official capacity as treasurer, Donald J. Trump, Dylan Howard, Michael Cohen, and Timothy Jost.
- c. Direct the Office of General Counsel to draft Factual and Legal Analyses dismissing the allegations.
- d. Approve the appropriate letters.
- e. Close the file as to Donald J. Trump for President, Inc., Bradley T. Crate, in his official capacity as treasurer, Donald J. Trump, Dylan Howard, Michael Cohen, and Timothy Jost.

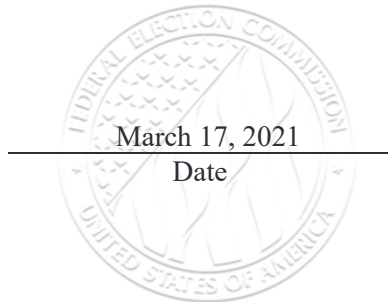
Commissioners Cooksey, Dickerson, and Trainor voted affirmatively for the motion.

Commissioners Broussard, Walther, and Weintraub dissented.

Federal Election Commission
Certification for MURs 7324, 7332, 7364, and 7366
March 11, 2021

Page 4

Attest:



Vicktoria Allen Digitally signed by Vicktoria Allen
Date: 2021.03.17 19:52:25 -04'00'

Vicktoria J. Allen
Acting Deputy Secretary of the
Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURs 7313, 7319 and 7379
Michael D. Cohen; Donald J. Trump;)
Donald J. Trump for President, Inc., and)
Bradley T. Crate in his official capacity)
as treasurer; Trump Organization, LLC)
Trump Tower Commercial, LLC)
Timothy Jost; Essential Consultants,)
LLC)

CERTIFICATION

I, Vicktoria J. Allen, recording secretary for the Federal Election Commission executive session on March 23, 2021, do hereby certify that the Commission decided by a vote of 4-1 to close the file in MURs 7313, 7319 and 7379:

Commissioners Broussard, Cooksey, Trainor, and Walther voted affirmatively for the decision. Commissioner Weintraub dissented. Commissioner Dickerson was recused and did not vote.

Attest:



Vicktoria Allen Digitally signed by Vicktoria Allen
Date: 2021.03.31 11:38:24 -04'00'

Vicktoria J. Allen
Acting Deputy Secretary of the Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURs 7324, 7332 and 7366
A360 Media, LLC and David J. Pecker:)
Proposed Pre-Probable Cause)
Conciliation Agreement)

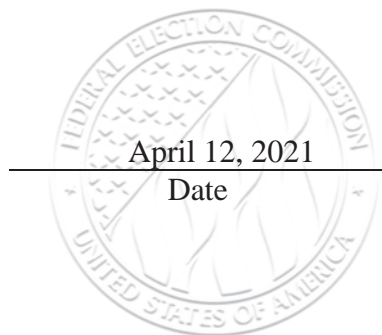
CERTIFICATION

I, Vicktoria J. Allen, recording secretary for the Federal Election Commission executive session on April 08, 2021, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MURs 7324, 7332, and 7366:

1. Approve the pre-probable cause conciliation agreement, as recommended in the Memorandum to the Commission dated March 18, 2021, and as circulated by Commissioner Weintraub's Office on Monday, April 5, 2021 at 4:56pm.
2. Send the appropriate letters.

Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

Attest:



Vicktoria Allen Digitally signed by Vicktoria Allen
Date: 2021.04.12 18:26:19 -04'00'

Vicktoria J. Allen
Acting Deputy Secretary of the Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURs 7324, 7332, 7364 and 7366
American Media, Inc. through its)
successor in interest, A360 Media, LLC,)
and David J. Pecker: Recommendation to)
Accept the Signed Pre-Probable Cause)
Conciliation Agreement)

CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on May 17, 2021, the Commission decided by a vote of 6-0 to take the following actions in MURs 7324, 7332, 7364, and 7366:

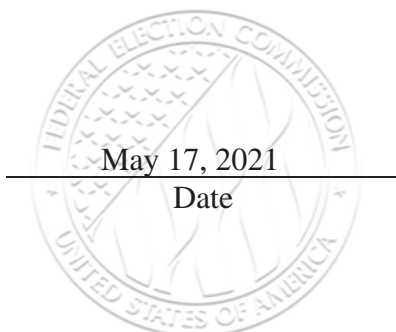
1. Accept the conciliation agreement with AMI, as recommended in the Memorandum to the Commission dated May 14, 2021.
2. Take no further action as to David J. Pecker.
3. Close the file in MURs 7324, 7332, 7364, and 7366 as to David J. Pecker and AMI.
4. Approve the appropriate letters.

Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

Attest:

**Laura
Sinram**

Digitally signed by
Laura Sinram
Date: 2021.05.17
18:11:46 -04'00'



Laura E. Sinram
Acting Secretary and Clerk of the
Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURs 7324, 7332, 7364 and 7366
Donald J. Trump, Make America Great)
Again PAC (formerly known as Donald)
J. Trump for President, Inc.) and)
Bradley T. Crate in his official capacity)
as treasurer; Michael D. Cohen; Dylan)
Howard; Timothy Jost)

CERTIFICATION

I, Vicktoria J. Allen, recording secretary for the Federal Election Commission executive session on May 20, 2021, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MURs 7324, 7332, 7364, and 7366:

1. Close the file.
2. Send the appropriate letters.

Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

Attest:



Vicktoria Allen Digitally signed by Vicktoria Allen
Date: 2021.05.27 11:59:41 -04'00'

Vicktoria J. Allen
Acting Deputy Secretary of the Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 7339
Trump Victory and Bradley T. Crate in)
his official capacity as treasurer;)
Republican National Committee and)
Anthony W. Parker in his official)
capacity as treasurer; Donald J. Trump)
for President, Inc. and Bradley T. Crate)
in his official capacity as treasurer;)
Donald J. Trump; Alabama Republican)
Party and Sallie Bryant in her official)
capacity as treasurer; Republican Party of)
Arkansas and Joel Pritchett in his official)
capacity as treasurer; California)
Republican Party and Mario Guerra in)
his official capacity as treasurer;)
Connecticut Republican Party and)
Warner C. Pyne, III in his official)
capacity as treasurer; Illinois Republican)
Party and Judy A. Diekelman in her)
official capacity as treasurer; Kansas)
Republican Party and Richard L. Todd in)
his official capacity as treasurer;)
Republican Party of Louisiana and)
Dexter Duhon in his official capacity as)
treasurer; Republican Party of)
Minnesota-Federal and Bron Scherer in)
his official capacity as treasurer;)
Mississippi Republican Party and Paul V.)
Breazeale in his official capacity as)
treasurer; Missouri Republican State)
Committee-Federal and Patricia Thomas)
in her official capacity as treasurer; New)
Jersey Republican State Committee and)
April Bengivenga in her official capacity)
as treasurer; NY Republican Federal)
Campaign Committee and Steven Wells)
in her official capacity as treasurer; North)

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Carolina Republican Party and Jason)
Lemons in his official capacity as)
treasurer; North Dakota Republican Party)
and Nicholas Hacker in his official)
capacity as treasurer; Republican Federal)
Committee of Pennsylvania and)
Dakshinamurthy Raja in his official)
capacity as treasurer; South Carolina)
Republican Party and Sharon Thompson)
in her official capacity as treasurer;)
Tennessee Republican Party Federal)
Election Account and Frank Colvett in)
his official capacity as treasurer;)
Republican Party of Virginia Inc. and)
John G. Selph in his official capacity as)
acting treasurer; West Virginia)
Republican Party, Inc. and Michelle L.)
Wilshere in her official capacity as)
treasurer; Republican Party of Wisconsin)
and Andrew Hitt in his official capacity)
as treasurer; Wyoming Republican Party,)
Inc. and Doug Chamberlain in his official)
capacity as treasurer)

CERTIFICATION

I, Laura E. Sinram, recording secretary of the Federal Election Commission executive session, do hereby certify that on April 25, 2019, the Commission took the following actions in the above-captioned matter:

1. Failed by a vote of 2-2 to:

a.

b.

c. Find reason to believe that Trump Victory and Bradley T. Crate in his official capacity as treasurer, Donald J. Trump For President, Inc. and Bradley T. Crate in his official capacity as treasurer, the Republican National Committee and Anthony W. Parker in his official capacity as treasurer, and the twenty-one state party committees violated 11 C.F.R. § 102.17(c)(1) and (2).

- 10074763001
- d. Find reason to believe that the Republican National Committee and Anthony W. Parker in his official capacity as treasurer violated 52 U.S.C. § 30116(f).
 - e. Find reason to believe that Trump Victory and Bradley T. Crate in his official capacity as treasurer, the Republican National Committee and Anthony W. Parker in his official capacity as treasurer, and the twenty-one state party committees violated 52 U.S.C § 30104(a) and (b) and 11 C.F.R. § 104.3(a) and (b).
 - f.
 - g. Find reason to believe that the Republican National Committee and Anthony W. Parker in his official capacity as treasurer violated 52 U.S.C. § 30116(a) and 11 C.F.R. §§ 109.20(a) and 109.32.
 - h. Find reason to believe that Donald J. Trump For President, Inc. and Bradley T. Crate in his official capacity as treasurer violated 52 U.S.C. § 30116(f) and 11 C.F.R. §§ 109.20(a) and 109.32.
 - i. Take no action at this time with regard to the alleged violations of 52 U.S.C. §§ 30116(a)(8) and 30122 and 11 C.F.R. §§ 110.4 and 110.6 against all Respondents.
 - j. Direct the Office of General Counsel to draft an appropriate Factual and Legal Analysis based on the findings made in this motion.
 - k. Approve the appropriate letters.

Commissioners Walther and Weintraub voted affirmatively for the motion.

Commissioners Hunter and Petersen dissented.

**Federal Election Commission
Certification for MUR 7339
April 25, 2019**

Page 4

NOTED 04/24/2019

5. Failed by a vote of 3-1 to:

MUR 7339 (Trump Victory)

- a. Close the file.
- b. Approve defense of suit in the event Complainant in this matter subsequently files suit pursuant to 52 U.S.C. §30109(a)(8).
- c. Send the appropriate letters.

Commissioners Hunter, Petersen, and Walther voted affirmatively for the motion.

Commissioner Weintraub dissented.

6. Decided by a vote of 4-0 to:

MUR 7339 (Trump Victory)

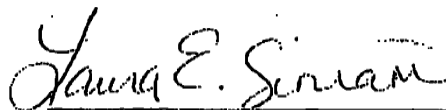
- a. Close the file.
- b. Send the appropriate letters.

Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

4/29/19

Date



Laura E. Sinram
Deputy Secretary of the Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURs 7340 and 7609
Great America Committee and Cabell)
Hobbs in his official capacity as)
treasurer; America First Policies, Inc.;)
America First Action, Inc. and Jon Proch)
in his official capacity as treasurer;)
President Donald J. Trump; Donald J.)
Trump for President, Inc. and Bradley T.)
Crate in his official capacity as treasurer;)
Vice President Michael R. Pence;)
Republican National Committee and)
Ronald C. Kaufman in his official)
capacity as treasurer; Parscale Strategy,)
LLC; Bradley J. Parscale; MO Strategies,)
Inc.; Marty Obst)

CERTIFICATION

I, Vicktoria J. Allen, recording secretary of the Federal Election Commission executive session, do hereby certify that on April 20, 2021, the Commission took the following actions in the above-captioned matter:

1. Failed by a vote of 3-2 to:
 - a. Find reason to believe that Donald J. Trump and Donald J. Trump for President, Inc. and Bradley T. Crate in his official capacity as treasurer violated 52 U.S.C. § 30125 by establishing, financing, maintaining, or controlling America First Policies, Inc. and America First Action, Inc., which raised and spent soft money.
 - b. Find reason to believe that America First Policies, Inc. and America First Action, Inc. and Jon Proch in his official capacity as treasurer violated 52 U.S.C. § 30125 by accepting soft money contributions as

organizations established, financed, maintained, or controlled by a federal candidate or office holder.

- c. Find reason to believe that Donald J. Trump; Donald J. Trump for President, Inc. and Bradley T. Crate in his official capacity as treasurer, though their agent, Brad Parscale, violated 52 U.S.C. § 30125 by raising soft money for America First Policies, Inc. and America First Action, Inc.
- d. Take no action at this time regarding the allegation that the Republican National Committee and Ronald C. Kaufman in his official capacity as treasurer violated 52 U.S.C. § 30125.
- e. Take no action at this regarding the allegation that Michael R. Pence, and Great America Committee and Cabell Hobbs in his official capacity as treasurer violated 52 U.S.C. § 30125.
- f. Find reason to believe that America First Policies, Inc. violated 52 U.S.C. §§ 30116 and 30118 by making excessive and prohibited contributions in the form of coordinated expenditures.
- g. Find reason to believe that Donald J. Trump for President, Inc. and Bradley T. Crate in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b), 30116, and 30118 by receiving and failing to report excessive and prohibited contributions in the form of coordinated expenditures.
- h. Find reason to believe that Donald J. Trump for President, Inc. and Bradley T. Crate in his official capacity as treasurer violated 52 U.S.C. § 30125(e) and 11 C.F.R. § 300.61 by soliciting soft money.
- i. Direct the Office of General Counsel to draft appropriate Factual and Legal Analyses consistent with these findings.
- j. Authorize the use of compulsory process.
- k. Approve the appropriate letters.

Commissioners Broussard, Walther, and Weintraub voted affirmatively for the motion.

Commissioners Cooksey and Dickerson dissented. Commissioner Trainor was recused and did not vote.

2. Failed by a vote of 2-2 to:

- a. Dismiss the allegation that Donald J. Trump and Donald J. Trump for President, Inc. and Bradley T. Crate in his official capacity as treasurer violated 52 U.S.C. § 30125 by establishing, financing, maintaining, or controlling America First Policies, Inc. and America First Action, Inc., which raised and spent soft money.
- b. Dismiss the allegation that America First Policies, Inc. and America First Action, Inc. and Jon Proch in his official capacity as treasurer violated 52 U.S.C. § 30125 by accepting soft money contributions as organizations established, financed, maintained, or controlled by a federal candidate or office holder.
- c. Dismiss the allegation that Donald J. Trump; Donald J. Trump for President, Inc. and Bradley T. Crate in his official capacity as treasurer; or the Republican National Committee and Ronald C. Kaufman in his official capacity as treasurer, though their agent, Brad Parscale, violated 52 U.S.C. § 30125 by raising soft money for America First Policies, Inc. and America First Action, Inc.
- d. Dismiss the allegation that Michael R. Pence, and Great America Committee and Cabell Hobbs in his official capacity as treasurer, through their agent, Marty Obst, violated 52 U.S.C. § 30125 by raising soft money for America First Policies, Inc. and America First Action, Inc.
- e. Dismiss the allegation that America First Policies, Inc. violated 52 U.S.C. §§ 30116 and 30118 by making excessive and prohibited contributions in the form of coordinated expenditures.
- f. Dismiss the allegation that Donald J. Trump for President, Inc. and Bradley T. Crate in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b), 30116, and 30118 by receiving and failing to report excessive and prohibited contributions in the form of coordinated expenditures.
- g. Approve the Factual and Legal Analyses, as recommended in the First General Counsel's Report dated November 24, 2020, that correspond to those dismissed respondents.
- h. Close the file as to America First Policies, Inc.; America First Action, Inc. and Jon Proch in his official capacity as treasurer; Republican National Committee and Ronald C. Kaufman in his official capacity as treasurer; Parscale Strategy, LLC; Bradley J. Parscale; Great America Committee and Cabell Hobbs in his official capacity as treasurer;

President Donald J. Trump; Vice President Michael R. Pence; MO
Strategies, Inc.; and Marty Obst.

- i. Issue appropriate letters.

Commissioners Cooksey and Dickerson voted affirmatively for the motion.

Commissioners Broussard and Weintraub dissented. Commissioner Walther abstained.

Commissioner Trainor was recused and did not vote.

Attest:



May 5, 2021

Date

Vicktoria Allen Digitally signed by Vicktoria Allen
Date: 2021.05.05 17:00:28 -04'00'

Vicktoria J. Allen
Acting Deputy Secretary of the
Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURs 7340 and 7609
Great America Committee and Cabell)
Hobbs in his official capacity as)
treasurer; America First Policies, Inc.;)
America First Action, Inc. and Jon Proch)
in his official capacity as treasurer;)
President Donald J. Trump; Donald J.)
Trump for President, Inc. and Bradley T.)
Crate in his official capacity as treasurer;)
Vice President Michael R. Pence;)
Republican National Committee and)
Ronald C. Kaufman in his official)
capacity as treasurer; Parscale Strategy,)
LLC; Bradley J. Parscale; MO Strategies,)
Inc.; Marty Obst)

CERTIFICATION

I, Vicktoria J. Allen, recording secretary of the Federal Election Commission executive session, do hereby certify that on April 22, 2021, the Commission took the following actions in the above-captioned matter:

1. Failed by a vote of 2-3 to:
 - a. Dismiss under *Heckler v. Chaney* the allegation that Donald J. Trump for President, Inc. and Bradley T. Crate in his official capacity as treasurer violated 52 U.S.C. § 30125(e) and 11 C.F.R. § 300.61 by soliciting soft money.
 - b. Approve the Factual and Legal Analysis, as recommended in the First General Counsel's Report dated November 24, 2020, subject to the edits last circulated by Commissioner Cooksey's Office on March 24, 2021 at 12:44 p.m.

Commissioners Cooksey and Dickerson voted affirmatively for the motion.

Commissioners Broussard, Walther, and Weintraub dissented. Commissioner Trainor was recused and did not vote.

2. Decided by a vote of 5-0 to:

- a. Close the file.
- b. Issue appropriate letters.

Commissioners Broussard, Cooksey, Dickerson, Walther, and Weintraub voted affirmatively for decision. Commissioner Trainor was recused and did not vote.

Attest:



May 5, 2021
Date

Vicktoria Allen Digitally signed by Vicktoria Allen
Date: 2021.05.05 17:16:36 -04'00'

Vicktoria J. Allen
Acting Deputy Secretary of the
Commission

RECEIVED
FEDERAL ELECTION
COMMISSION

2019 APR 12 AM 2:36

CELA

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURs 7350, 7351, 7357 and 7382
Cambridge Analytica LLC; SCL Group)
LTD; Donald J. Trump; Donald J.)
Trump for President, Inc., and Bradley)
T. Crate in his official capacity as)
treasurer; Make America Number 1 and)
Jacquelyn James in her official capacity)
as treasurer; Alexander Nix; Mark)
Turnbull; Stephen K. Bannon; Bradley)
J. Parscale; Christopher Wylie; Rebekah)
Mercer; Nigel Oaks; Alexander Tayler;)
Jared Kushner; Steve K. Bannon; Cruz)
for President and Bradley S. Knippa in)
his official capacity as treasurer; Thom)
Tillis Committee and Collin McMichael)
in his official capacity as treasurer; Art)
Robinson for Congress and Art)
Robinson in his official capacity as)
treasurer; John Bolton Super PAC and)
Cabell Hobbs in his official capacity as)
treasurer; North Carolina Republican)
Party and Jason Lemons in his official)
capacity as treasurer; Tim Glister)

CERTIFICATION

I, Dayna C. Brown, recording secretary for the Federal Election Commission executive session on April 11, 2019, do hereby certify that the Commission failed by a vote of 2-0, subject to the Notice of Errata Memorandum dated March 7, 2019, to:

1. Find reason to believe that Cambridge Analytica LLC violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(i) (MURs 7350, 7351, and 7382).

2. Find reason to believe that Alexander Nix violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(i) (MURs 7350, 7351, and 7382).
3. Find reason to believe that Donald J. Trump for President, Inc., and Bradley T. Crate in his official capacity as treasurer violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(i) (MURs 7350 and 7351).
4. Find reason to believe that Make America Number 1 and Jacquelyn James in her official capacity as treasurer violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(i) (MURs 7350 and 7351).
5. Find reason to believe that Christopher Wylie violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(i) (MURs 7350 and 7351).
6. Find reason to believe that Mark Turnbull violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(i) (MURs 7350 and 7351).
7. Find reason to believe that the John Bolton Super PAC and Cabell Hobbs in his official capacity as treasurer violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(i) (MURs 7351 and 7382).
8. Find reason to believe that Art Robinson for Congress and Art Robinson in his official capacity as treasurer violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(i) (MUR 7351).
9. Find reason to believe that Cruz for President and Bradley S. Knippa in his official capacity as treasurer violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(i) (MUR 7351).
10. Find reason to believe that the Thom Tillis Committee and Collin McMichael in his official capacity as treasurer violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(i) (MURs 7351 and 7382).
11. Find reason to believe that the North Carolina Republican Party and Jason Lemons in his official capacity as treasurer violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(i) (MUR 7382).
12. Find reason to believe that the John Bolton Super PAC and Cabell Hobbs in his official capacity as treasurer violated 52 U.S.C. §§ 30116(a), 30118(a), and 11 C.F.R. § 109.21 (MURs 7357 and 7382).

13. Take no action at this time as to the remaining Respondents (MURs 7350, 7351, 7357, and 7382).
14. Approve the Factual and Legal Analyses as recommended in the First General Counsel's Report dated December 14, 2018 (MURs 7350, 7351, 7357, and 7382).
15. Authorize the use of compulsory process (MURs 7350, 7351, 7357, and 7382).
16. Approve the appropriate letters (MURs 7350, 7351, 7357, and 7382).

Commissioners Walther and Weintraub voted affirmatively for the motion.

Commissioners Hunter and Petersen abstained.

Attest:

April 12, 2019

Date

Dayna C. Brown

Dayna C. Brown

Secretary and Clerk of the Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURs 7350, 7351, 7357 and 7382
Cambridge Analytica LLC; SCL Group)
LTD; Donald J. Trump; Donald J. Trump)
for President, Inc., and Bradley T. Crate)
in his official capacity as treasurer; Make)
America Number 1 and Jacquelyn James)
in her official capacity as treasurer;)
Alexander Nix; Mark Turnbull; Stephen)
K. Bannon; Bradley J. Parscale;)
Christopher Wylie; Rebekah Mercer;)
Nigel Oaks; Alexander Tayler; Jared)
Kushner; Steve K. Bannon; Cruz for)
President and Bradley S. Knippa in his)
official capacity as treasurer; Thom Tillis)
Committee and Collin McMichael in his)
official capacity as treasurer; Art)
Robinson for Congress and Art Robinson)
in his official capacity as treasurer; John)
Bolton Super PAC and Cabell Hobbs in)
his official capacity as treasurer; North)
Carolina Republican Party and Jason)
Lemons in his official capacity as)
treasurer; Tim Glister)

2019 JUL 31 AM 10:16
CELA

CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on July 24, 2019, the Commission decided by a vote of 4-0 to:

1. Find reason to believe that Cambridge Analytica LLC violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(i) (MURs 7350, 7351, and 7382).
2. Find reason to believe that Christopher Wylie violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(i) (MURs 7350 and 7351).

Federal Election Commission
Certification for MURs 7350, 7351, 7357, and 7382
July 24, 2019

3. Find reason to believe that the John Bolton Super PAC and Cabell Hobbs in his official capacity as treasurer violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(i) (MURs 7351 and 7382).
4. Find reason to believe that Art Robinson for Congress and Art Robinson in his official capacity as treasurer violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(i) (MUR 7351).
5. Find reason to believe that the Thom Tillis Committee and Collin McMichael in his official capacity as treasurer violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(i) (MURs 7351 and 7382).
6. Find reason to believe that the North Carolina Republican Party and Jason Lemons in his official capacity as treasurer violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(i) (MUR 7382).
7. Approve the Factual and Legal Analyses for Cambridge Analytica LLC; Christopher Wylie; John Bolton Super PAC and Cabell Hobbs in his official capacity as treasurer; Art Robinson for Congress and Art Robinson in his official capacity as treasurer; Thom Tillis Committee and Collin McMichael in his official capacity as treasurer; and North Carolina Republican Party and Jason Lemons in his official capacity as treasurer, as recommended in the Memorandum to the Commission from Chair Ellen L. Weintraub dated July 24, 2019.
8. Authorize the use of compulsory process.
9. Approve the appropriate letters.

Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

7/30/19

Date



Laura E. Sinram
Acting Secretary and Clerk of the
Commission

2019 AUG 23 PM 1:02

CELA

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURs 7350, 7351 and 7382
Cambridge Analytica LLC; SCL Group)
LTD; Donald J. Trump; Donald J.)
Trump for President, Inc., and Bradley)
T. Crate in his official capacity as)
treasurer; Make America Number 1 and)
Jacquelyn James in her official capacity)
as treasurer; Alexander Nix; Mark)
Turnbull; Stephen K. Bannon; Bradley)
J. Parscale; Christopher Wylie; Rebekah)
Mercer; Nigel Oaks; Alexander Tayler;)
Jared Kushner; Steve K. Bannon; Cruz)
for President and Bradley S. Knippa in)
his official capacity as treasurer; Thom)
Tillis Committee and Collin McMichael)
in his official capacity as treasurer; Art)
Robinson for Congress and Art)
Robinson in his official capacity as)
treasurer; John Bolton Super PAC and)
Cabell Hobbs in his official capacity as)
treasurer; North Carolina Republican)
Party and Jason Lemons in his official)
capacity as treasurer; Tim Glister)

AMENDED CERTIFICATION

I, Vicktoria J. Allen, recording secretary for the Federal Election Commission executive session on August 20, 2019, do hereby certify that the Commission decided by a vote of 4-0, subject to the Notice of Errata Memorandum dated March 7, 2019, to:

1. Find reason to believe that Alexander Nix violated 11 C.F.R. § 110.20(i) and 52 U.S.C. § 30121.

2. Approve the Factual and Legal Analysis for Alexander Nix, as recommended in the First General Counsel's Report dated December 14, 2018, and edited by the Offices of Vice Chairman Petersen and Commissioner Hunter and last circulated by Chair Weintraub's Office on August 20, 2019.
3. Authorize the use of compulsory process.
4. Approve the appropriate letters.

Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

8/23/19
Date

Vicktorija J. Allen
Vicktorija J. Allen
Acting Deputy Secretary of the Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURs 7350 and 7351
Christopher Wylie: Circulation of)
Discovery Documents)

CERTIFICATION

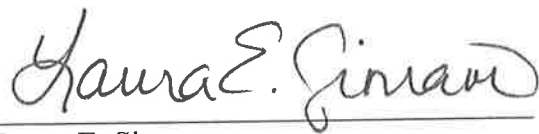
I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on August 30, 2019, the Commission decided by a vote of 4-0 to approve the Subpoena to Produce Documents and Order to Submit Written Answers to Christopher Wylie, as recommended in the Memorandum from the Acting General Counsel dated August 28, 2019.

Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

9/3/19

Date



Laura E. Sinram
Acting Secretary and Clerk of the
Commission

BEFORE THE FEDERAL ELECTION COMMISSION

| | | |
|---|---|--------------------------------|
| In the Matter of |) | |
| |) | MURs 7350, 7351, 7357 and 7382 |
| Cambridge Analytica LLC; SCL Group |) | |
| LTD; Alexander Nix; Mark Turnbull; |) | |
| Christopher Wylie; Donald J. Trump; |) | |
| Donald J. Trump for President, Inc., and |) | |
| Bradley T. Crate in his official capacity |) | |
| as treasurer; Make America Number 1 |) | |
| and Jacquelyn James in her official |) | |
| capacity as treasurer; Cruz for President |) | |
| and Bradley S. Knippa in his official |) | |
| capacity as treasurer; Thom Tillis |) | |
| Committee and Collin McMichael in his |) | |
| official capacity as treasurer; Art |) | |
| Robinson for Congress and Art Robinson |) | |
| in his official capacity as treasurer; John |) | |
| Bolton Super PAC and Cabell Hobbs in |) | |
| his official capacity as treasurer; North |) | |
| Carolina Republican Party and Jason |) | |
| Lemons in his official capacity as |) | |
| treasurer ; Stephen K. Bannon; Bradley J. |) | |
| Parscale; Rebekah Mercer; Nigel Oaks; |) | |
| Alexander Tayler; Tim Glister; Jared |) | |
| Kushner |) | |

CERTIFICATION

I, Vicktoria J. Allen, recording secretary of the Federal Election Commission executive session, do hereby certify that on September 30, 2021, the Commission took the following actions in the above-captioned matter:

1. Failed by a vote of 3-2 to:
 - a. Dismiss the allegations due to the expiration of the statute of limitations.

- b. Close the file.
- c. Send the appropriate letters.

Commissioners Cooksey, Dickerson, and Trainor voted affirmatively for the motion.

Commissioners Broussard and Weintraub dissented. Commissioner Walther abstained

2. Decided by a vote of 5-0 to:

- a. Close the file.
- b. Send appropriate letters.

Commissioners Broussard, Cooksey, Dickerson, Trainor, and Weintraub voted affirmatively for the decision. Commissioner Walther abstained.

Attest:



October 4, 2021

Date

Vicktoria Allen Digitally signed by Vicktoria Allen
Date: 2021.10.04 14:16:16 -04'00'

Vicktoria J. Allen
Acting Deputy Secretary of the
Commission

RECEIVED
FEDERAL ELECTION
COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION

2019 MAY -7 PM 3:56

CELA

| | | |
|---|---|----------|
| In the Matter of |) | |
| |) | MUR 7376 |
| Republican Party of Florida and Mike |) | |
| Moberley in his official capacity as |) | |
| treasurer; Charlotte County Republican |) | |
| Executive Committee; Charlotte County |) | |
| Republican Club; West Charlotte County |) | |
| Republican Club; Friends of Connie |) | |
| Mack/Mack PAC and David Satterfield |) | |
| in his official capacity as treasurer; |) | |
| Douglas Curtis; Raymond Corcoran; Bill |) | |
| Folchi; Donald J. Trump for President, |) | |
| Inc. and Bradley T. Crate in his official |) | |
| capacity as treasurer |) | |

CERTIFICATION

I, Dayna C. Brown, Secretary and Clerk of the Federal Election

Commission, do hereby certify that on May 07, 2019, the Commission decided

by a vote of 4-0 to take the following actions in MUR 7376:

1. Dismiss the allegations that Charlotte County Republican Executive Committee, West Charlotte Republican Club, and Charlotte County Republican Club violated 52 U.S.C. §§ 30102, 30103 and 30104.
2. Dismiss the allegations that Charlotte County Republican Executive Committee, West Charlotte Republican Club, Charlotte County Republican Club, Douglas Curtis, and Bill Folchi violated 52 U.S.C. § 30116(a) by making excessive contributions to Donald J. Trump for President, Inc.
3. Dismiss the allegations that Donald J. Trump for President, Inc. and Bradley T. Crate in his official capacity as treasurer violated 52 U.S.C. § 30116(f).


Federal Election Commission
MUR 7376
May 07, 2019

4. Dismiss the allegations that Charlotte County Republican Executive Committee, West Charlotte Republican Club, and Charlotte County Republican Club violated 52 U.S.C. § 30125(b)(1) and 11 C.F.R. §§ 102.5, 300.32(a)(2), 300.36(a).
5. Dismiss the allegations that Donald J. Trump for President, Inc. and Bradley T. Crate in his official capacity as treasurer violated 52 U.S.C. § 30125(e).
6. Dismiss the allegations that Charlotte County Republican Executive Committee violated 52 U.S.C. § 30120 and 11 C.F.R. § 110.11.
7. Dismiss the allegations as to Republican Party of Florida.
8. Find no reason to believe that Friends of Connie Mack/Mack PAC and David Satterfield in his official capacity as treasurer violated 52 U.S.C. § 30116(f).
9. Approve the Factual and Legal Analysis, as recommended in the First General Counsel's Report dated March 22, 2019, subject to the edits circulated via email by Vice Chairman Petersen's office on May 6, 2019 at 6:31 p.m.
10. Approve the appropriate letters.
11. Close the file.

Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

May 7, 2019
Date


Dayna C. Brown
Secretary and Clerk of the Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 7390
Donald J. Trump; Make America Great)
Again PAC f/k/a Donald J. Trump for)
President and Bradley T. Crate in his)
official capacity as treasurer;)
Republican National Committee and)
Ronald C. Kaufman in his official)
capacity as treasurer)

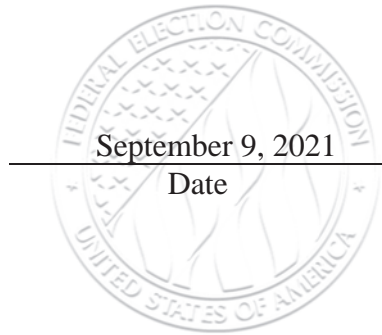
CERTIFICATION

I, Vicktoria J. Allen, recording secretary for the Federal Election Commission executive session on September 02, 2021, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions for MUR 7390:

1. Find no reason to believe that Make America Great Again PAC f/k/a Donald J. Trump for President and Bradley T. Crate in his official capacity as treasurer and Donald J. Trump violated 52 U.S.C. § 30114(b) and 11 C.F.R. § 113.2(e) by converting campaign funds to personal use.
2. Dismiss the allegation that the Republican National Committee and Ronald C. Kaufman in his official capacity as treasurer made prohibited expenditures in violation of 52 U.S.C. § 30116(f).
3. Approve the Factual and Legal Analyses, as recommended in the First General Counsel's Report dated June 23, 2021, subject to the edits circulated by the Office of General Counsel on Wednesday, September 1, 2021 at 9:52 a.m.
4. Approve the appropriate letters.
5. Close the file.

Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

Attest:



Vicktoria Allen Digitally signed by Vicktoria Allen
Date: 2021.09.09 20:54:40 -04'00'

Vicktoria J. Allen
Acting Deputy Secretary of the Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 7401
 George G. Lombardi; America First-)
 Team Manatee, Inc.; Citizens for Trump;)
 Coalition for Trump; Coalition for Trump)
 Superstore; Corey Lewandowski; Donald)
 J. Trump; Donald J. Trump for President,)
 Inc. and Bradley T. Crate in his official)
 capacity as treasurer; Jack Posobiec;)
 Latinos for Trump (aka Latinos with)
 Trump); Madeline Moreira; Michael)
 Cernovich; Patriotic Warriors LLC;)
 Reince Priebus; Robert Jeter; Sam)
 Clovis; Tim Clark; Tim Selaty, Sr.)

CERTIFICATION

I, Laura E. Sinram, recording secretary of the Federal Election Commission executive session, do hereby certify that on July 11, 2019, the Commission took the following actions in the above-captioned matter, subject to the Notice of Errata Memorandum dated April 2, 2019:

1. Failed by a vote of 2-2 to:

- a. Find reason to believe that Citizens for Trump violated 52 U.S.C. §§ 30102, 30103, and 30104.
- b. Take no action at this time with regard to the allegations that George G. Lombardi, Patriotic Warriors, and Tim Selaty, Sr. violated 52 U.S.C. §§ 30102, 30103, and 30104.
- c. Find reason to believe that Coalition for Trump, Coalition for Trump Superstore, and Robert Jeter violated 52 U.S.C. § 30124(b).
- d. Take no action at this time with regard to whether George G. Lombardi violated 52 U.S.C. § 30124(b).

- e. Find no reason to believe that Jack Posobiec and Michael Cernovich violated 52 U.S.C. § 30121.
- f. Dismiss the allegations that America First-Team Manatee, Inc., Citizens for Trump, Coalition for Trump, Coalition for Trump Superstore, Corey Lewandowski, Donald J. Trump, Donald J. Trump for President, Inc., and Bradley T. Crate in his official capacity as treasurer, George G. Lombardi, Jack Posobiec, Latinos for Trump (aka Latinos with Trump), Madeline Moreira, Michael Cernovich, Patriotic Warriors LLC, Reince Priebus, Robert Jeter, Sam Clovis, Tim Clark, and Tim Selaty, Sr. violated 52 U.S.C. §§ 30116 and 30118 and 11 C.F.R. § 109.21 by making and accepting prohibited contributions in the form of coordinated communications or expenditures.
- g. Take no action at this time against Coalition for Trump regarding the foreign national allegations.
- h. Approve the Factual and Legal Analyses, as recommended in the First General Counsel's Report dated February 28, 2019,
 - i. subject to the edits last circulated by Chair Weintraub's Office for the Citizens for Trump, Jack Posobiec, and Michael Cernovich Factual and Legal Analyses, and
 - ii. the corresponding edit of adding "under Commission Regulations" to page 8, line 12 to the Coalition for Trump Factual and Legal Analysis and to page 2, line 1 of the sample Factual and Legal Analysis for George G. Lombardi, and all respondents in similar situations, dismissing the coordination allegations.
- i. Authorize the use of compulsory process, including the issuance of appropriate interrogatories, document subpoenas, and deposition subpoenas, as necessary.
- j. Approve the appropriate letters.

Commissioners Walther and Weintraub voted affirmatively for the motion.

Commissioners Hunter and Petersen dissented.

2. Decided by a vote of 4-0 to:

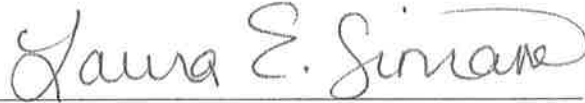
- a. Find reason to believe that Citizens for Trump violated 52 U.S.C. §§ 30102, 30103, and 30104 and approve the Office of General Counsel's corresponding Factual and Legal Analysis, subject to the edits last circulated by Chair Weintraub's Office on July 9, 2019.
- b. Take no action at this time with regard to the allegations that George G. Lombardi, Patriotic Warriors, and Tim Selaty, Sr. violated 52 U.S.C. §§ 30102, 30103, and 30104.
- c. Take no action at this time against Coalition for Trump regarding the foreign national allegations.
- d. Take no action at this time with regard to whether George G. Lombardi violated 52 U.S.C. § 30124(b).
- e. Find no reason to believe that Jack Posobiec and Michael Cernovich violated 52 U.S.C. § 30121 and approve the Office of General Counsel's Factual and Legal Analyses subject to the edits last circulated by the Office of General Counsel on Wednesday, July 10, 2019 at 3:19 p.m.
- f. Dismiss the allegations that America First-Team Manatee, Inc., Citizens for Trump, Coalition for Trump, Coalition for Trump Superstore, Corey Lewandowski, Donald J. Trump, Donald J. Trump for President, Inc., and Bradley T. Crate in his official capacity as treasurer, George G. Lombardi, Jack Posobiec, Latinos for Trump (aka Latinos with Trump), Madeline Moreira, Michael Cernovich, Patriotic Warriors LLC, Reince Priebus, Robert Jeter, Sam Clovis, Tim Clark, and Tim Selaty, Sr. violated 52 U.S.C. §§ 30116 and 30118 and 11 C.F.R. § 109.21 by making and accepting prohibited contributions in the form of coordinated communications or expenditures and direct the Office of General Counsel to prepare corresponding Factual and Legal Analyses that confirm to the edits last circulated by Chair Weintraub's Office on July 9, 2019.
- g. Authorize the use of compulsory process, including the issuance of appropriate interrogatories, document subpoenas, and deposition subpoenas, as necessary.
- h. Approve the appropriate letters.

Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

7/15/19

Date

A handwritten signature in cursive script, reading "Laura E. Sinram", written over a horizontal line.

Laura E. Sinram

Acting Secretary and Clerk of the
Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 7401
 George G. Lombardi; America First-)
 Team Manatee, Inc.; Citizens for Trump;)
 Coalition for Trump; Coalition for Trump)
 Superstore; Corey Lewandowski; Donald)
 J. Trump; Donald J. Trump for President,)
 Inc. and Bradley T. Crate in his official)
 capacity as treasurer; Jack Posobiec;)
 Latinos for Trump (aka Latinos with)
 Trump); Madeline Moreira; Michael)
 Cernovich; Patriotic Warriors LLC;)
 Reince Priebus; Robert Jeter; Sam)
 Clovis; Tim Clark; Tim Selaty, Sr.)

CERTIFICATION

I, Laura E. Sinram, recording secretary of the Federal Election Commission executive session, do hereby certify that on July 11, 2019, the Commission took the following actions in the above-captioned matter, subject to the Notice of Errata Memorandum dated April 2, 2019:

1. Failed by a vote of 2-2 to:
 - a. Find reason to believe that Citizens for Trump violated 52 U.S.C. §§ 30102, 30103, and 30104.
 - b. Take no action at this time with regard to the allegations that George G. Lombardi, Patriotic Warriors, and Tim Selaty, Sr. violated 52 U.S.C. §§ 30102, 30103, and 30104.
 - c. Find reason to believe that Coalition for Trump, Coalition for Trump Superstore, and Robert Jeter violated 52 U.S.C. § 30124(b).
 - d. Take no action at this time with regard to whether George G. Lombardi violated 52 U.S.C. § 30124(b).

Federal Election Commission
Certification for MUR 7401
July 11, 2019

Page 2

- e. Find no reason to believe that Jack Posobiec and Michael Cernovich violated 52 U.S.C. § 30121.
- f. Dismiss the allegations that America First-Team Manatee, Inc., Citizens for Trump, Coalition for Trump, Coalition for Trump Superstore, Corey Lewandowski, Donald J. Trump, Donald J. Trump for President, Inc., and Bradley T. Crate in his official capacity as treasurer, George G. Lombardi, Jack Posobiec, Latinos for Trump (aka Latinos with Trump), Madeline Moreira, Michael Cernovich, Patriotic Warriors LLC, Reince Priebus, Robert Jeter, Sam Clovis, Tim Clark, and Tim Selaty, Sr. violated 52 U.S.C. §§ 30116 and 30118 and 11 C.F.R. § 109.21 by making and accepting prohibited contributions in the form of coordinated communications or expenditures.
- g. Take no action at this time against Coalition for Trump regarding the foreign national allegations.
- h. Approve the Factual and Legal Analyses, as recommended in the First General Counsel's Report dated February 28, 2019,
- i. Authorize the use of compulsory process, including the issuance of appropriate interrogatories, document subpoenas, and deposition subpoenas, as necessary.
- j. Approve the appropriate letters.

Commissioners Walther and Weintraub voted affirmatively for the motion.

Commissioners Hunter and Petersen dissented.

2. Decided by a vote of 4-0 to:

Federal Election Commission
 Certification for MUR 7401
 July 11, 2019

Page 3

- a. Find reason to believe that Citizens for Trump violated 52 U.S.C. §§ 30102, 30103, and 30104 and approve the Office of General Counsel's corresponding Factual and Legal Analysis, subject to the edits last circulated by Chair Weintraub's Office on July 9, 2019.
- b. Take no action at this time with regard to the allegations that George G. Lombardi, Patriotic Warriors, and Tim Selaty, Sr. violated 52 U.S.C. §§ 30102, 30103, and 30104.
- c. Take no action at this time against Coalition for Trump regarding the foreign national allegations.
- d. Take no action at this time with regard to whether George G. Lombardi violated 52 U.S.C. § 30124(b).
- e. Find no reason to believe that Jack Posobiec and Michael Cernovich violated 52 U.S.C. § 30121 and approve the Office of General Counsel's Factual and Legal Analyses subject to the edits last circulated by the Office of General Counsel on Wednesday, July 10, 2019 at 3:19 p.m.
- f. Dismiss the allegations that America First-Team Manatee, Inc., Citizens for Trump, Coalition for Trump, Coalition for Trump Superstore, Corey Lewandowski, Donald J. Trump, Donald J. Trump for President, Inc., and Bradley T. Crate in his official capacity as treasurer, George G. Lombardi, Jack Posobiec, Latinos for Trump (aka Latinos with Trump), Madeline Moreira, Michael Cernovich, Patriotic Warriors LLC, Reince Priebus, Robert Jeter, Sam Clovis, Tim Clark, and Tim Selaty, Sr. violated 52 U.S.C. §§ 30116 and 30118 and 11 C.F.R. § 109.21 by making and accepting prohibited contributions in the form of coordinated communications or expenditures and direct the Office of General Counsel to prepare corresponding Factual and Legal Analyses that confirm to the edits last circulated by Chair Weintraub's Office on July 9, 2019.
- g. Authorize the use of compulsory process, including the issuance of appropriate interrogatories, document subpoenas, and deposition subpoenas, as necessary.
- h. Approve the appropriate letters.

Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

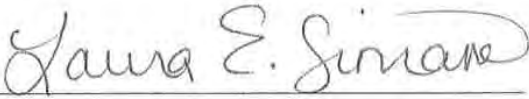
Federal Election Commission
Certification for MUR 7401
July 11, 2019

Page 4

Attest:

7/15/19

Date



Laura E. Sinram
Acting Secretary and Clerk of the
Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 7401
Citizens for Trump: Circulation of)
Discovery Documents)

CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on September 04, 2019, the Commission decided by a vote of 4-0 to approve the Subpoena to Produce Documents and Order to Submit Written Answers to Citizens for Trump, as recommended in the Memorandum from the Acting General Counsel dated August 27, 2019, subject to the edits circulated by Commissioner Hunter's Office on August 30, 2019 at 11:04 a.m.

Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

9/5/19
Date

Laura E. Sinram
Laura E. Sinram
Acting Secretary and Clerk of the
Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 7401
Citizens for Trump: Circulation of)
Discovery Documents – Subpoenas to)
Rally Piryx LLC and PayPal Holdings,
Inc.

CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on July 02, 2020, the Commission decided by a vote of 4-0 to approve the Subpoenas to Produce Documents and Orders to Submit Written Answers to Rally Piryx LLC and PayPal Holdings, Inc., as recommended in the Memorandum from the Acting General Counsel dated June 30, 2020.

Commissioners Hunter, Trainor, Walther, and Weintraub voted affirmatively for the decision.



July 30, 2020

Date

Attest:

**Laura
Sinram**

Laura E. Sinram
Acting Secretary and Clerk of the
Commission

 Digitally signed by
Laura Sinram
Date: 2020.07.30
20:00:55 -04'00'

BEFORE THE FEDERAL ELECTION COMMISSION

| | | |
|--|---|----------|
| In the Matter of |) | |
| |) | MUR 7401 |
| Citizens for Trump; George G. |) | |
| Lombardi; America First-Term Manatee, |) | |
| Inc.; Coalition for Trump; Coalition for |) | |
| Trump Superstore; Corey Lewandowski; |) | |
| Donald J. Trump; Donald J. Trump for |) | |
| President, Inc. and Bradley T. Crate in |) | |
| his official capacity as treasurer; Jack |) | |
| Posobiec; Latinos for Trump (aka |) | |
| Latinos with Trump); Madeline Moreira; |) | |
| Michael Cemovich; Patriotic Warriors |) | |
| LLC; Reince Priebus; Robert Jeter; Sam |) | |
| Clovis; Tim Clark; and Tim Selaty, Sr. |) | |

CERTIFICATION

I, Vicktoria J. Allen, recording secretary of the Federal Election Commission executive session, do hereby certify that on April 28, 2022, the Commission took the following actions in the above-captioned matter:

1. Failed by a vote of 3-3 to:
 - a. Take no further action as to Citizens for Trump.
 - b. Dismiss the allegations that George G. Lombardi violated 52 U.S.C. §§ 30102, 30103, and 30104.
 - c. Dismiss the allegations that George G. Lombardi violated 52 U.S.C. § 30124(b).

Federal Election Commission
Certification for MUR 7401
April 28, 2022

Page 2

- e. Approve the appropriate letters.
- f. Close the file as to all respondents.

Commissioners Broussard, Walther, and Weintraub voted affirmatively for the motion.

Commissioners Cooksey, Dickerson, and Trainor dissented.

2. Decided by a vote of 6-0 to:

- a. Take no further action as to Citizens for Trump.
- b. Dismiss the allegations that George G. Lombardi violated 52 U.S.C. §§ 30102, 30103, and 30104.
- c. Dismiss the allegations that George G. Lombardi violated 52 U.S.C. § 30124(b).
- d. Approve the appropriate letters.
- e. Close the file to all respondents.

Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

Attest:



Vicktoria J Allen

Digitally signed by Vicktoria J
Allen
Date: 2022.05.04 10:37:05 -04'00'

Vicktoria J. Allen
Acting Deputy Secretary of the
Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) PRE-MURs 611 and MUR 7425
Donald J. Trump Foundation; Donald J.)
Trump for President, Inc. and Bradley T.)
Crate in his official capacity as treasurer;)
Donald J. Trump; Trump Organization;)
Corey Lewandowski; Allen Weisselberg;)
Jeff McConney; Madeline Campbell)
Burr; Hope Hicks; Stuart Jolly; Brad)
Parscale; Ivanka Trump; Eric Trump;)
Donald Trump, Jr.)

CERTIFICATION

I, Vicktoria J. Allen, recording secretary of the Federal Election Commission executive session, do hereby certify that on January 14, 2021, the Commission took the following actions in the above-captioned matter:

1. Failed by a vote of 3-3 to:
 - a. Open a Matter Under Review with respect to Pre-MUR 611 and merge it into MUR 7425
 - b. Find reason to believe that Donald J. Trump, Donald J. Trump for President, Inc. and Bradley T. Crate in his official capacity as treasurer, and the Donald J. Trump Foundation violated 52 U.S.C. § 30125(e) by soliciting, receiving, directing, transferring, or spending soft money in connection with the Fundraiser during the 2016 election cycle.
 - c. Take no action at this time with respect to the allegations that Corey Lewandowski, Madeline Campbell Burr, Hope Hicks, Stuart Jolly, Brad Parscale, Ivanka Trump, Eric Trump, Donald Trump, Jr., Allen Weisselberg, Jeff McConney, and the Trump Organization violated 52 U.S.C. § 30125(e) by soliciting, receiving, directing, transferring, or

spending soft money in connection with the Fundraiser during the 2016 election cycle.

- d. Find no reason to believe that Donald J. Trump and Donald J. Trump Foundation violated the Act in connection with the \$25,000 donation to And Justice for All.
- e. Approve the Factual and Legal Analysis, as recommended in the First General Counsel's Report dated May 30, 2019.
- f. Direct the Office of General Counsel to revise the Factual and Legal Analysis circulated on May 31, 2019, as recommended in the Supplemental Submission dated March 24, 2020.
- g. Authorize pre-probable cause conciliation with Donald J. Trump for President and Bradley T. Crate in his official capacity as treasurer, and Donald J. Trump Foundation, and Donald J. Trump.
- h. Approve the appropriate letters.

Commissioners Broussard, Walther, and Weintraub voted affirmatively for the motion.

Commissioners Cooksey, Dickerson, and Trainor dissented.

2. Failed by a vote of 3-3 to:

- a. Dismiss the allegations that Donald J. Trump, Donald J. Trump for President, Inc. and Bradley T. Crate in his official capacity as treasurer, the Donald J. Trump Foundation, Trump Organization, Corey Lewandowski, Allen Weisselberg, Jeff McConney, Madeline Campbell Burr, Hope Hicks, Stuart Jolly, Brad Parscale, Ivanka Trump, Eric Trump, and Donald Trump, Jr. violated 52 U.S.C. § 30116 (a) and (f), 52 U.S.C. § 30118 (a) and 52 U.S.C. §30125 (e).
- b. Send the appropriate letters.
- c. Close the file.

Commissioners Cooksey, Dickerson, and Trainor voted affirmatively for the motion.

Commissioners Broussard, Walther, and Weintraub dissented.



Attest:

Vicktoria Allen Digitally signed by Vicktoria Allen
Date: 2021.01.26 22:22:41 -05'00'

Vicktoria J. Allen
Acting Deputy Secretary of the
Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) PRE-MUR 611 and MUR 7425
Donald J. Trump Foundation; Donald J.)
Trump for President, Inc. and Bradley)
T. Crate in his official capacity as)
treasurer; Donald J. Trump; Trump)
Organization; Corey Lewandowski;)
Allen Weisselberg; Jeff McConney;)
Madeline Campbell Burr; Hope Hicks;)
Stuart Jolly; Brad Parscale; Ivanka)
Trump; Eric Trump; Donald Trump, Jr.;)
and Supplemental Submissions)

CERTIFICATION

I, Vicktoria J. Allen, recording secretary for the Federal Election Commission executive session on January 11, 2022, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in Pre-MUR 611 and MUR 7425:

1. Close the file.
2. Issue the appropriate letters.

Commissioners Broussard, Cooksey, Dickerson, Trainor, and Weintraub voted affirmatively for the decision. Commissioner Walther dissented.

Attest:



Vicktoria J Allen  Digitally signed by Vicktoria J Allen
Date: 2022.01.14 09:51:58 -05'00'

Vicktoria J. Allen
Acting Deputy Secretary of the Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 7450
Ashbritt, Inc.; America First Action, Inc.)
and Jon Proch in his official capacity as)
treasurer)

CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on July 23, 2019, the Commission decided by a vote of 4-0 to take the following actions in MUR 7450:

1. Find reason to believe that Ashbritt, Inc. violated 52 U.S.C. § 30119(a)(1) and 11 C.F.R. § 115.2(a).
2. Take no action at this time as to America First Action, Inc.
3. Approve the Factual and Legal Analysis, as recommended in the First General Counsel's Report dated May 6, 2019, subject to the edits last circulated by Commissioner Walther's Office dated July 23, 2019 at 9:59 a.m.
4. Approve the appropriate letter.

Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

7/24/19
Date

Laura E. Sinram
Laura E. Sinram
Acting Secretary and Clerk of the
Commission

AR/m

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 7450
Ashbritt, Inc.; America First Action,)
Inc. and Jon Proch in his official)
capacity as treasurer)

CERTIFICATION

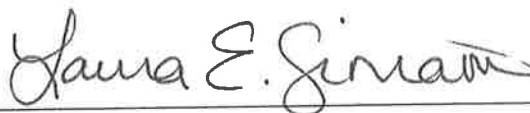
I, Laura E. Sinram, recording secretary for the Federal Election Commission executive session on July 25, 2019, do hereby certify that the Commission decided by a vote of 4-0 to authorize compulsory process.

Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

7/29/19

Date



Laura E. Sinram
Acting Secretary and Clerk of the Commission