In the Matter of	)	
	)	MUR 7450
AshBritt, Inc., et al.	)	

# **CERTIFICATION**

I, Vicktoria J. Allen, recording secretary for the Federal Election Commission executive session on January 26, 2021, do hereby certify that the Commission decided by a vote of 4-2 to authorize the Office of General Counsel to engage in pre-probable cause conciliation with Ashbritt, Inc. for a period not to exceed 21 days from the date in which a pre-probable cause conciliation agreement is authorized, or 3 months if the respondents agree to tolling, and to take no action at this time on the Office of General Counsel's request to circulate discovery documents.

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

Attest:

February 11, 2021

Date

Vicktoria Allen Digitally signed by Vicktoria Allen Date: 2021.02.11 16:01:43 -05'00'

In the Matter of	)	
	)	MUR 7450
AshBritt, Inc.: Circulation of	)	
Conciliation Agreement for AshBritt,	)	
Inc.	)	

# **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 6-0 to approve the conciliation agreement for AshBritt, Inc., as recommended in the Memorandum to the Commission dated March 10, 2021.

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

April 14, 2021

Date

Attest:

Vicktoria Allen Digitally signed by Vicktoria Allen Date: 2021.04.14 13:30:14 - 04'00'

In the Matter of	)	
	)	MUR 7450
AshBritt, Inc.: Recommendation to	)	
Accept Signed Conciliation Agreement	)	

# **CERTIFICATION**

- I, Vicktoria J. Allen, recording secretary for the Federal Election Commission executive session on July 13, 2021, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 7450:
  - 1. Accept the signed conciliation agreement with AshBritt, Inc., as recommended in the Memorandum to the Commission dated June 28, 2021.
  - 2. Dismiss the allegation that America First Action, Inc. and Jon Proch in his official capacity as treasurer violated 52 U.S.C. § 30119(a)(2) by knowingly soliciting a federal contractor contribution.
  - 3. Approve the appropriate letters, as recommended in the Memorandum to the Commission dated June 28, 2021.
  - 4. Close the file

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

Attest: July 15, 2021 Vicktoria J. Allen Date

Vicktoria Allen Digitally signed by Vicktoria Allen Date: 2021.07.15 20:20:19 -04'00'

Acting Deputy Secretary of the Commission

In the Matter of	)
	) MURs 7524, 7553 and 7558
National Rifle Association of America	)
Political Victory Fund and Robert	)
Owens, in his official capacity as	)
treasurer; National Rifle Association of	)
America Institute for Legislative Action	)
and Robert Owens, in his official	)
capacity as treasurer; Thom Tillis	)
Committee and Collin McMichael in his	)
official capacity as treasurer; Cotton for	)
Senate and Theodore V. Koch in his	)
official capacity as treasurer; Cory	)
Gardner for Senate and Lisa Lisker in	)
her official capacity as treasurer; Ron	)
Johnson for Senate, Inc. and James J.	)
Malczewski in his official capacity as	)
treasurer; Josh Hawley for Senate and	)
Salvatore Purpura in his official	)
capacity as treasurer; OnMessage, Inc.;	)
Starboard Strategic, Inc.; National	)
Media Research and Placement, LLC;	)
Red Eagle Media Group; American	)
Media & Advocacy Group, LLC;	)
Donald J. Trump for President, Inc. and	)
Bradley T. Crate in his official capacity	)
as treasurer; Donald J. Trump; Donald	)
J. Trump; National Media Research	)
Planning and Placement, LLC	)

# **CERTIFICATION**

I, Vicktoria J. Allen, recording secretary for the Federal Election Commission executive session on February 23, 2021, do hereby certify that the Commission failed by a vote of 2-3 to find no reason to believe in MURs 7524, 7553, and 7558.

Commissioners Dickerson and Trainor voted affirmatively for the motion.

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

April 12, 2021

Date

Attest:

Vicktoria Allen Digitally signed by Vicktoria Allen Date: 2021.04.12 14:10:25 -04'00'

In the Matter of	)	
	)	MURs 7558, 7560 and 7621
Donald J. Trump; Donald J. Trump for	)	
President, Inc. and Bradley T. Crate,	)	
treasurer in his official capacity;	)	
National Rifle Association of America	)	
Political Victory Fund and Robert	)	
Owens, treasurer in his official capacity;	)	
National Media Research Planning and	)	
Placement, LLC; Red Eagle Media	)	
Group; American Media & Advocacy	)	
Group, LLC; Richard Burr; The Richard	)	
Burr Committee and Timothy W.	)	
Gupton, treasurer in his official	)	
capacity; Joshua David Hawley; Josh	)	
Hawley for Senate and Salvatore	)	
Purpura, treasurer in his official	)	
capacity; Matt Rosendale; Matt	)	
Rosendale for Montana and Errol Galt,	)	
treasurer in his official capacity;	)	
National Rifle Association Institute for	)	
Legislative Action and Roger G.	)	
Owens, treasurer in his official capacity;	)	
National Rifle Association Institute for	)	
Legislative Action and Robert Owens,	)	
treasurer in his official capacity	)	

# **CERTIFICATION**

I, Vicktoria J. Allen, recording secretary for the Federal Election Commission executive session on February 23, 2021, do hereby certify that the Commission failed by a vote of 3-2 to take the following actions:

### **MUR 7558**

- 1. Find reason to believe that the National Rifle Association of America Political Victory Fund violated 52 U.S.C. §§ 30104(b), 30116(a) and 30118(a) by making an failing to report excessive and prohibited in-kind contributions to Donald J. Trump for President, Inc. and Bradley T. Crate in his official capacity as treasurer.
- 2. 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(f), and 30118(a).
- 3. Direct the Office of General Counsel to draft corresponding Factual and Legal Analyses and appropriate letters.
- 4. Approve the Factual and Legal Analysis, as recommended in the First General Counsel's Report dated September 18, 2019, subject to the edits circulated by Commissioner Weintraub's Office on January 25, 2021 and 6:05 p.m.
- 5. Authorize the use of compulsory process, including the issuance of appropriate interrogatories, document subpoenas, and deposition subpoenas, as necessary.

### **MUR 7560**

- Find reason to believe that the National Rifle Association of America Political Victory Fund violated 52 U.S.C. §§ 30104(b), 30116(a), and 30118(a) by making and failing to report excessive and prohibited in-kind contributions to The Richard Burr Committee and Timothy W. Gupton in his official capacity as treasurer.
- 2. Find reason to believe that the National Rifle Association of America Political Victory Fund violated 52 U.S.C. §§ 30104(b), 30116(a), and 30118(a) by making and failing to report excessive and prohibited in-kind contributions to Josh Hawley for Senate and Salvatore Purpura in his official capacity as treasurer.
- 3. Find reason to believe that the National Rifle Association Institute for Legislative Action violated 52 U.S.C. §§ 30104(b), 30116(a), and 30118(a) by making and failing to report excessive and prohibited in-kind contributions to Rosendale for Montana and Errol Galt in his official capacity as treasurer.
- 4. Find reason to believe that The Richard Burr Committee and Timothy W. Gupton in his official capacity as treasurer, Hawley for

Senate and Salvatore Purpura in his official capacity as treasurer, and Rosendale for Montana and Errol Galt in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b), 30116(f), and 30118(a).

- 5. Direct the Office of General Counsel to draft corresponding Factual and Legal Analyses and appropriate letters.
- 6. Approve the Factual and Legal Analysis, as recommended in the First General Counsel's Report dated September 18, 2019, subject to the edits circulated by Commissioner Weintraub's Office on January 25, 2021 at 6:05 p.m.
- 7. Authorize the use of compulsory process, including the issuance of appropriate interrogatories, document subpoenas, and deposition subpoenas, as necessary.
- 8. Approve the appropriate letters.

#### **MUR 7621**

- 1. Find reason to believe that the National Rifle Association Institute for Legislative Action violated 52 U.S.C. §§ 30104(b), 30116(a), and 30118(a) by making and failing to report excessive and prohibited in-kind contributions to Rosendale for Montana and Errol Galt in his official capacity as treasurer.
- 2. Find reason to believe that Matt Rosendale for Montana and Errol Galt in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b), 30116(f), and 30118(a);
- 3. Direct the Office of General Counsel to draft a corresponding Factual and Legal Analysis and appropriate letter.
- 4. Approve the Factual and Legal Analysis, as recommended in the First General Counsel's Report dated September 18, 2019, subject to the edits circulated by Commissioner Weintraub's Office on January 25, 2021 at 6:05 p.m.
- 5. Authorize the use of compulsory process, including the issuance of appropriate interrogatories, document subpoenas, and deposition subpoenas, as necessary.
- 6. Approve the appropriate letter.

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

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



Attest:

Vicktoria Allen Digitally signed by Vicktoria Allen Date: 2021.04.12 13:08:51 -04'00'

In the Matter of	)	
	)	MURs 7427, 7497, 7524, 7553 and 7621
National Rifle Association of America	)	
Political Victory Fund and Sonya B.	)	
Rowling, in her official capacity as	)	
treasurer; National Rifle Association of	)	
America Institute for Legislative Action	)	
and Robert Owens, in his official	)	
capacity as treasurer; OnMessage, Inc.;	)	
Starboard Strategic, Inc.; Thom Tillis	)	
Committee and Collin McMichael in his	)	
official capacity as treasurer; Cotton for	)	
Senate and Theodore V. Koch in his	)	
official capacity as treasurer; Cory	)	
Gardner for Senate and Lisa Lisker in	)	
her official capacity as treasurer; Ron	)	
Johnson for Senate, Inc. and James J.	)	
Malczewski in his official capacity as	)	
treasurer; Matt Rosendale for Montana	)	
and Errol Galt in his official capacity as	)	
treasurer; Josh Hawley for Senate and	)	
Salvatore Purpura in his official	)	
capacity as treasurer; National Media	)	
Research and Placement, LLC; Red	)	
Eagle Media Group; American Media &	)	
Advocacy Group, LLC; Make America	)	
Great Again PAC f/k/a Donald J.	)	
Trump for President, Inc. and Bradley	)	
T. Crate in his official capacity as	)	
treasurer; Matt Rosendale	)	

**CERTIFICATION** 

I, Vicktoria J. Allen, recording secretary for the Federal Election Commission executive session on October 26, 2021, do hereby certify that the Commission failed by a vote of 2-3 to take the following actions in MURs 7427, 7497, 7524, 7553, and 7621:

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

Commissioners Dickerson and Trainor voted affirmatively for the motion.

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

October 27, 2021
Date

Attest:

Vicktoria J Allen Allen

Digitally signed by Vicktoria J

Date: 2021.10.27 18:11:56 -04'00'

In the Matter of	)
	) MURs 7427, 7497, 7524, 7553, 7558,
National Rifle Association of America	) 7560, 7621, 7654 and 7660
Political Victory Fund, et al.; America	)
First Action, Inc., et al.: Waiver of	)
Confidentiality	)

# **CERTIFICATION**

I, Vicktoria J. Allen, recording secretary for the Federal Election Commission executive session on December 02, 2021, do hereby certify that the Commission failed by a vote of 2-1 to approve the appropriate letters acknowledging waivers by Respondents (to be sent to counsel of record), as recommended in the Memorandum to the Commission dated November 9, 2021.

Commissioners Dickerson and Trainor voted affirmatively for the motion.

Commissioner Walther dissented. Commissioners Broussard and Weintraub abstained.

Commissioner Cooksey was recused and did not vote.

December 9, 2021

Date

Vicktoria J Allen
Date: 2021.12.09 22:26:38 -05'00'

Vicktoria J. Allen
Acting Deputy Secretary of the Commission

In the Matter of	)	
	) ]	MURs 7427, 7497, 7524, 7553, 7558,
National Rifle Association of America	) ′	7560, 7621, 7654 and 7660
Political Victory Fund; National Rifle	)	
Association of America Institute for	)	
Legislative Action; OnMessage, Inc.,;	)	
Starboard Strategic, Inc.; National Media	)	
Research and Placement, LLC; Red	)	
Eagle Media Group; American Media &	)	
Advocacy Group, LLC; Richard Burr;	)	
Richard Burr Committee; Josh Hawley	)	
for Senate; Thom Tillis Committee; Ron	)	
Johnson for Senate; Make America Great	)	
Again PAC, f/k/a Donald J. Trump for	)	
President; Cory Gardner for Senate;	)	
Cotton for Senate; Matt Rosendale for	)	
Montana: Waiver of Confidentiality	)	
	)	

## **CERTIFICATION**

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on January 11, 2022, the Commission decided by a vote of 5-0 to approve the appropriate letters acknowledging waivers by Respondents (to be sent to counsel of record), as recommended in the Memorandum to the Commission dated November 9, 2021.

Commissioners Broussard, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision. Commissioner Cooksey recused himself with respect to this matter and did not vote.

January 12, 2022

Date

Laura e Sinram

Digitally signed by Laura e Sinram

Date: 2022.01.12 13:26:30

-05'00'

Laura E. Sinram

Acting Secretary and Clerk of the Commission

In the Matter of	)
	) MURs 7427, 7497, 7524 and 7553
National Rifle Association of America	
Political Victory Fund and Robert	
Owens, in his official capacity as	)
treasurer; National Rifle Association of	
America Institute for Legislative Action	
and Robert Owens, in his official	
capacity as treasurer; OnMessage, Inc.;	
Starboard Strategic, Inc.; Thom Tillis	
Committee and Collin McMichael in his	
official capacity as treasurer; Cotton for	)
Senate and Theodore V. Koch in his	)
official capacity as treasurer; Cory	)
Gardner for Senate and Lisa Lisker in	)
her official capacity as treasurer; Ron	)
Johnson for Senate, Inc. and James J.	)
Malczewski in his official capacity as	)
treasurer; Matt Rosendale for Montana	)
and Errol Galt in his official capacity as	)
treasurer; Josh Hawley for Senate and	)
Salvatore Purpura in his official	)
capacity as treasurer; National Media	)
Research and Placement, LLC; Red	)
Eagle Media Group; American Media &	)
Advocacy Group, LLC; Donald J.	)
Trump for President, Inc. and Bradley	)
T. Crate in his official capacity as	)
treasurer	)

# **CERTIFICATION**

I, Vicktoria J. Allen, recording secretary for the Federal Election Commission executive session on January 11, 2022, do hereby certify that the Commission failed by a vote of 2-3 to take the following actions in MURs 7427, 7497, 7524, and 7553:

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

Commissioners Dickerson and Trainor voted affirmatively for the motion.

Commissioners Broussard, Walther, and Weintraub dissented. Commissioner Cooksey is recused and did not vote.

January 14, 2022
Date

Attest:

Vicktoria J Allen Date: 2022.01.14 10:13:40 -05'00'

In the Matter of	)	
	)	MURs 7427, 7497, 7524 and 7553
National Rifle Association of America	)	
Political Victory Fund, et al:	)	
Memorandum from Chairman Dickerson	)	
dated August 29, 2022	)	

# **CERTIFICATION**

I, Vicktoria J. Allen, Acting Deputy Secretary of the Federal Election Commission, do hereby certify that on August 29, 2022, the Commission decided by a vote of 4-1 to close the file and send the appropriate letters, as recommended in the Memorandum from Chairman Dickerson dated August 29, 2022.

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

August 31, 2022 Date

Attest:

Vicktoria J Allen Date: 2022.08.31 15:14:50

Digitally signed by Vicktoria J -04'00'

In the Matter of	)	
	)	MURs 7560, 7621 and 7558
National Rifle Association of America	)	
Political Victory Fund, et al.:	)	
Memorandum from Chairman Dickerson	)	
dated September 6, 2022	)	

# **CERTIFICATION**

I, Vicktoria J. Allen, Acting Deputy Secretary of the Federal Election Commission, do hereby certify that on September 06, 2022, the Commission decided by a vote of 4-1 to close the file and send the appropriate letters, as recommended in the Memorandum from Chairman Dickerson dated September 6, 2022.

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

September 6, 2022
Date

Attest:

Vicktoria J Allen Date: 2022.09.06 19:07:38 -04'00'

In the Matter of	)	
	)	MUR 7571
Donald J. Trump for President, Inc., and	)	
Bradley T. Crate in his official capacity	)	
as treasurer; Donald J. Trump	)	

### **CERTIFICATION**

I, Vicktoria J. Allen, recording secretary for the Federal Election Commission executive session on April 20, 2021, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 7571:

- 1. Dismiss the allegation that Donald J. Trump, Donald J. Trump for President, Inc., and Bradley T. Crate in his official capacity as treasurer violated 52 U.S.C. § 30114.
- 2. Approve the Factual and Legal Analysis, as recommended in the First General Counsel's Report dated January 16, 2020, subject to the edits last circulated by Commissioner Weintraub's Office on April 14, 2021 at 3:54 p.m.
- 3. Approve the appropriate letters.
- 4. Close the file.

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

May 3, 2021
Date

Attest:

Vicktoria Allen

Digitally signed by Vicktoria Allen
Date: 2021.05.03 18:20:06 -04'00'

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.

May 5, 2021 Date

Attest:

Vicktoria Allen Date: 2021.05.05 17:00:28 -04'00'

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.

May 5, 2021 Date

Attest:

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

In the Matter of	)	
	)	MURs 7581 and 7614
Li Juan "Cindy" Gong f/k/a Li Juan	)	
"Cindy" Yang; Bingbing Peranio;	)	
Katrina Eggertsson; Gong Haizhen;	)	
Unknown Respondents; Xinyue "Daniel"	)	
Lou; Sun Changchun; Jingzhu	)	
"Margaret" Yang; Jiusi Yao; Ma Jin; Li	)	
Jing; Jon Deng; Hui Liu; Ryan Xu; Li	)	
Xiaohua; Republican Party of Palm	)	
Beach County and Jane C. Pike in her	)	
official capacity as treasurer; 45th	)	
Presidential Inaugural Committee; Make	)	
America Great Again PAC f/k/a Donald	)	
J. Trump for President, Inc. and Bradley	)	
T. Crate in his official capacity as	)	
treasurer; Republican National	)	
Committee and Ronald C. Kaufman in	)	
his official capacity as treasurer; Trump	)	
Victory and Bradley T. Crate in his	)	
official capacity as treasurer	)	

# **CERTIFICATION**

- I, Vicktoria J. Allen, recording secretary of the Federal Election Commission executive session, do hereby certify that on July 28, 2022, the Commission took the following actions in the above-captioned matter:
  - 1. Failed by a vote of 3-3 to:
    - a. Find reason to believe that Li Juan "Cindy" Gong f/k/a Li Juan "Cindy" Yang violated 52 U.S.C. § 30122 by making contributions in the name of another.
    - b. Find reason to believe that Li Juan "Cindy" Gong f/k/a Li Juan "Cindy" Yang violated 52 U.S.C. § 30116(a)(1) by making excessive contributions.

- c. Find reason to believe that Li Juan "Cindy" Gong f/k/a Li Juan "Cindy" Yang violated 52 U.S.C. § 30121(a) and 11 C.F.R. § 110.20(h)(1) by providing substantial assistance in the making of foreign national contributions.
- d. Dismiss the allegations that Li Jing, Jon Deng, Hui Liu, and Unknown Respondents violated 52 U.S.C. § 30122 by making contributions in the name of another.
- e. Dismiss the allegations that Xinyue "Daniel" Lou, Sun Changchun, Jingzhu "Margaret" Yang, Jiusi Yao, Ma Jin, Li Jing, and Unknown Respondents violated 52 U.S.C. § 30121(a) and 11 C.F.R. § 110.20(h)(1) by providing substantial assistance to foreign nationals making prohibited contributions.
- f. Dismiss the allegations that Ryan Xu, Li Xiaohua, and Unknown Respondents violated 52 U.S.C. § 30121 by making foreign national contributions.
- g. Close the file as to Xinyue "Daniel" Lou, Sun Changchun, Jingzhu "Margaret" Yang, Jiusi Yao, Ma Jin, Li Jing, Jon Deng, Hui Liu, Ryan Xu, Li Xiaohua and Unknown Respondents.
- h. Dismiss the allegation that Trump Victory and Bradley T. Crate in his official capacity as treasurer, the Republican National Committee and Ronald C. Kaufman in his official capacity as treasurer, Make American Great Again PAC f/k/a Donald J. Trump for President, Inc. and Bradley T. Crate in his official capacity as treasurer, the Republican Party of Palm Beach County and Jane C. Pike in her official capacity as treasurer violated 52 U.S.C.
  § 30121 by accepting foreign national contributions and close the file as to these respondents.
- i. Dismiss the allegation that the 45<sup>th</sup> Presidential Inaugural Committee violated 11 C.F.R. § 110.20(j) by accepting foreign national donations and close the file as to this respondent.
- j. Dismiss the allegations that Bingbing Peranio, Katrina Eggertsson, Gong Haizhen and Unknown Respondents violated 52 U.S.C. § 30122 by permitting their names to be used to effect contributions in the name of another and close the file as to these respondents.
- k. Approve the Factual and Legal Analyses, as recommended in the First General Counsel's Report dated June 28, 2022.

- 1. Enter into conciliation with Li Juan "Cindy" Gong f/k/a Li Juan "Cindy" Yang prior to a finding of probable cause.
- m. Approve the conciliation agreement for Li Juan "Cindy" Gong f/k/a Li Juan "Cindy" Yang, as recommended in the First General Counsel's Report dated June 28, 2022.
- n. Approve the appropriate letters.

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

Commissioners Cooksey, Dickerson, and Trainor dissented.

- 2. Decided by a vote of 4-2 to:
  - a. Dismiss as a matter of prosecutorial discretion based on *Heckler v. Chaney* the allegations that Li Juan "Cindy" Gong f/k/a Li Juan "Cindy" Yang violated 52 U.S.C. § 30122 by making contributions in the name of another.
  - b. Dismiss as a matter of prosecutorial discretion based on *Heckler v. Chaney* the allegations that Li Juan "Cindy" Gong f/k/a Li Juan "Cindy" Yang violated 52 U.S.C. § 30116(a)(1) by making excessive contributions.
  - c. Dismiss as a matter of prosecutorial discretion based on *Heckler v. Chaney* the allegations that Li Juan "Cindy" Gong f/k/a Li Juan "Cindy" Yang violated 52 U.S.C. § 30121(a) and 11 C.F.R. § 110.20(h)(1) by providing substantial assistance in the making of foreign national contributions.
  - d. Dismiss as a matter of prosecutorial discretion based on *Heckler v*. *Chaney* the allegations that Li Jing, Jon Deng, Hui Liu, and Unknown Respondents violated 52 U.S.C. § 30122 by making contributions in the name of another.
  - e. Dismiss as a matter of prosecutorial discretion based on *Heckler v. Chaney* the allegations that Xinyue "Daniel" Lou, Sun Changchun, Jingzhu "Margaret" Yang, Jiusi Yao, Ma Jin, Li Jing, and Unknown Respondents violated 52 U.S.C. § 30121(a) and 11 C.F.R. § 110.20(h)(1) by providing substantial assistance to foreign nationals making prohibited contributions.

- f. Dismiss as a matter of prosecutorial discretion based on *Heckler v. Chaney* the allegations that Ryan Xu, Li Xiaohua, and Unknown Respondents violated 52 U.S.C. § 30121 by making foreign national contributions.
- g. Dismiss as a matter of prosecutorial discretion based on *Heckler v. Chaney* the allegation that Trump Victory and Bradley T. Crate in his official capacity as treasurer, the Republican National Committee and Ronald C. Kaufman in his official capacity as treasurer, Make American Great Again PAC f/k/a Donald J. Trump for President, Inc. and Bradley T. Crate in his official capacity as treasurer, the Republican Party of Palm Beach County and Jane C. Pike in her official capacity as treasurer violated 52 U.S.C. § 30121 by accepting foreign national contributions.
- h. Dismiss as a matter of prosecutorial discretion based on *Heckler v. Chaney* the allegation that the 45<sup>th</sup> Presidential Inaugural Committee violated 11 C.F.R. § 110.20(j) by accepting foreign national donations.
- Dismiss as a matter of prosecutorial discretion based on *Heckler v. Chaney* the allegations that Bingbing Peranio, Katrina Eggertsson, Gong Haizhen and Unknown Respondents violated 52 U.S.C. § 30122 by permitting their names to be used to effect contributions in the name of another.
- i. Close the file.
- k. Send the appropriate letters.

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

August 1, 2022
Date

Attest:

Vicktoria J Allen
Date: 2022.08.01 14:28:13

In the Matter of )	
, )	MUR 7637
National Rifle Association Institute for )	
Legislative Action; National Rifle )	
Association Political Victory Fund and )	
Robert G. Owens in his official capacity	
as treasurer; Donald J. Trump; Donald J.	
Trump for President and Bradley T.	
Crate in his official capacity as treasurer )	

### **CERTIFICATION**

I, Vicktoria J. Allen, recording secretary of the Federal Election Commission executive session, do hereby certify that on February 09, 2021, the Commission took the following actions in the above-captioned matter:

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

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 allegation that Donald J. Trump and Donald J. Trump for President and Bradley T. Crate in his official capacity as treasurer, violated 52 U.S.C. § 30121 (a) and 11 C.F.R. § 110.20(g) by knowingly soliciting, accepting, or receiving a prohibited foreign national contribution or donation in connection with an election.

- b. Dismiss the allegation that the National Rifle Association Institute for Legislative Action and the National Rifle Association Political Victory Fund and Robert G. Owens in his official capacity as treasurer violated 52 U.S.C. § 30121(a) and 11 C.F.R. § 110.20(g) by knowingly soliciting, accepting, or receiving a prohibited foreign national contribution or donation in connection with an election.
- c. Dismiss the allegation that the National Rifle Association Institute for Legislative Action and the National Rifle Association Political Victory Fund and Robert G. Owens in his official capacity as treasurer violated 11 C.F.R. § 110.20(h) by knowingly providing substantial assistance in the making or receipt of a prohibited foreign national contribution or donation.
- d. Adopt the Factual and Legal Analysis, as recommended in the First General Counsel's Report dated September 25, 2020.
- e. Close the file.
- f. Send the appropriate letters.

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

Commissioners Broussard, Walther, and Weintraub dissented.

- 3. Decided by a vote of 6-0 to:
  - a. Close the file.
  - b. Issue appropriate letters.

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

March 12, 2021
Date

Attest:

Vicktoria Allen Date: 2021.03.12 15:52:57 -05'00'

In the Matter of	)	
	)	MURs 7645, 7663 and 7705
Donald J. Trump; Donald J. Trump for	)	
President, Inc. and Bradley T. Crate in	)	
his official capacity as treasurer;	)	
Rudolph "Rudy" Giuliani; Lev Parnas;	)	
Igor Fruman; Victoria Toensing	)	

## **CERTIFICATION**

I, Vicktoria J. Allen, recording secretary for the Federal Election Commission executive session on April 28, 2022, do hereby certify that the Commission decided by a vote of 5-1 to authorize the Office of General Counsel to contact the Department of State to apprise them of the complaint in this matter and to seek the Department's position as to whether Commission's action would have any effect on the conduct of the United States government's foreign policy or any other collateral consequences they would like to make the Commission aware of.

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

May 4, 2022
Date

Attest:

Vicktoria J Allen Allen Date:

Digitally signed by Vicktoria J

Date: 2022.05.04 10:56:09 -04'00

In the Matter of	)	
	)	MURs 7645, 7663 and 7705
Donald J. Trump; Donald J. Trump for	)	
President, Inc. and Bradley T. Crate in	)	
his official capacity as treasurer;	)	
Rudolph "Rudy" Giuliani; Lev Parnas;	)	
Igor Fruman; Victoria Toensing	)	

### CERTIFICATION

I, Vicktoria J. Allen, recording secretary for the Federal Election Commission executive session on July 14, 2022, do hereby certify that the Commission failed by a vote of 3-3 to take the following actions in MURs 7645, 7663, and 7705:

### MURs 7645, 7663, and 7705

1. 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. § 30121(a)(2) and 11 C.F.R. § 110.20(g) by knowingly soliciting a prohibited foreign national contribution from Ukrainian President Volodymyr Zelensky.

### **MUR 7645**

- 2. Find reason to believe that Rudolph "Rudy" Giuliani violated 52 U.S.C. § 30121(a)(2) by knowingly soliciting a prohibited foreign national contribution under 11 C.F.R. § 110.20(g), OR knowingly providing substantial assistance in soliciting a prohibited foreign national under 11 C.F.R. § 110.20(h), from Ukrainian President Volodymyr Zelensky.
- 3. Find reason to believe that Lev Parnas violated 52 U.S.C. § 30121(a)(2) by knowingly soliciting a prohibited a foreign national contribution under 11 C.F.R. § 110.20(g), OR knowingly providing substantial assistance in soliciting a prohibited foreign national contribution under 11 C.F.R. § 110.20(h) from Ukrainian President Volodymyr Zelensky.

- 4. Dismiss the allegation that Igor Fruman violated 52 U.S.C. § 30121(a)(2) by knowingly soliciting a prohibited a foreign national contribution under 11 C.F.R. § 110.20(g) OR knowingly providing substantial assistance in soliciting a prohibited foreign national contribution under 11 C.F.R. § 110.20(h).
- 5. Dismiss the allegation that Victoria Toensing violated 52 U.S.C. § 30121(a)(2) by knowingly soliciting a prohibited a foreign national contribution under 11 C.F.R. § 110.20(g) OR knowingly providing substantial assistance in soliciting a prohibited foreign national contribution under 11 C.F.R. § 110.20(h).
- 6. Close the file as to Igor Fruman and Victoria Toensing.

### **MUR 7705**

7. 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. § 30121(a)(2) and 11 C.F.R. § 110.20(g) by knowingly soliciting a prohibited foreign national contribution from China.

# MURs 7645, 7663, and 7705

- 8. Approve the Factual and Legal Analyses and direct OGC to make technical edits conforming the language to the Commission's findings, as recommended in the First General Counsel's Report dated March 23, 2021.
- 9. Enter into conciliation with Donald J. Trump, Donald J. Trump for President, Inc. and Bradley T. Crate in his official capacity as treasurer, Rudolph "Rudy" Giuliani, and Lev Parnas prior to a finding of probable cause to believe
- 10. Approve the proposed Conciliation Agreements and direct OGC to make technical edits conforming the language to the Commission's findings, as recommended in the First General Counsel's Report dated March 23,2021, subject to increasing the civil penalty in each agreement to \$30,000.
- 11. Approve the appropriate letters.

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

Commissioners Cooksey, Dickerson, and Trainor dissented.

July 18, 2022
Date

Attest:

Vicktoria J Allen
Date: 2022.07.18 16:42:24 -04'00'

In the Matter of	)	
	)	MURs 7645, 7663 and 7705
Donald J. Trump; Donald J. Trump for	)	
President, Inc. and Bradley T. Crate in	)	
his official capacity as treasurer; Rudolph	)	
"Rudy" Giuliani; Lev Parnas; Igor	)	
Fruman; Victoria Toensing	)	

### CERTIFICATION

- I, Vicktoria J. Allen, recording secretary of the Federal Election Commission executive session, do hereby certify that on July 26, 2022, the Commission took the following actions in the above-captioned matter:
  - 1. Failed by a vote of 2-4 to:

## MURs 7645, 7663, and 7705

a. Find no 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. § 30121(a)(2) and 11 C.F.R. § 110.20(g) by knowingly soliciting a prohibited foreign national contribution from Ukrainian President Volodymyr Zelensky.

### **MUR 7645**

- b. Find no reason to believe that Rudolph "Rudy" Giuliani violated 52 U.S.C. § 30121(a)(2) and 11 C.F.R. § 110.20(g) by knowingly soliciting a prohibited foreign national contribution from Ukrainian President Volodymyr Zelensky.
- c. Find no reason to believe that Lev Parnas violated 52 U.S.C. § 30121(a)(2) and 11 C.F.R. § 110.20(g) by knowingly soliciting a prohibited foreign national contribution from Ukrainian President Volodymyr Zelensky.

- d. Dismiss the allegation that Igor Fruman violated 52 U.S.C. § 30121(a)(2) by knowingly soliciting a prohibited foreign national contribution under 11 C.F.R. § 110.20(g) OR knowingly providing substantial assistance in soliciting a prohibited foreign national contribution under 11 C.F.R. § 110.20(h).
- e. Dismiss the allegation that Victoria Toensing violated 52 U.S.C. § 30121(a)(2) by knowingly soliciting a prohibited foreign national contribution under 11 C.F.R. § 110.20(g) OR knowingly providing substantial assistance in soliciting a prohibited foreign national contribution under 11 C.F.R. § 110.20(h).

### **MUR 7705**

f. 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. § 30121(a)(2) and 11 C.F.R. § 110.20(g) by knowingly soliciting a prohibited foreign national contribution from China.

# MURs 7645, 7663, and 7705

- g. Close the file.
- h. Issue appropriate letters.

Commissioners Cooksey and Trainor voted affirmatively for the motion. Commissioners

Broussard, Dickerson, Walther, and Weintraub dissented.

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

### MURs 7645, 7663, and 7705

a. Find no 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. § 30121(a)(2) and 11 C.F.R. § 110.20(g) by knowingly soliciting a prohibited foreign national contribution from Ukrainian President Volodymyr Zelensky.

### **MUR 7645**

b. Find no reason to believe that Rudolph "Rudy" Giuliani violated 52 U.S.C. § 30121(a)(2) by knowingly soliciting a prohibited

foreign national contribution under 11 C.F.R. § 110.20(g), OR knowingly providing substantial assistance in soliciting a prohibited foreign national contribution under 11 C.F.R. § 110.20(h), from Ukrainian President Volodymyr Zelensky.

- c. Find no reason to believe that Lev Parnas violated 52 U.S.C. § 30121(a)(2) by knowingly soliciting a prohibited foreign national contribution under 11 C.F.R. § 110.20(g), OR knowingly providing substantial assistance in soliciting a prohibited foreign national contribution under 11 C.F.R. § 110.20(h), from Ukrainian President Volodymyr Zelensky.
- d. Find no reason to believe that the allegation that Victoria Toensing violated 52 U.S.C. § 30121(a)(2) by knowingly soliciting a prohibited foreign national contribution under 11 C.F.R. § 110.20(g) OR knowingly providing substantial assistance in soliciting a prohibited foreign national contribution under 11 C.F.R. § 110.20(h).

## **MUR 7705**

e. Find no reason to believe that 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. § 30121(a)(2) and 11 C.F.R. § 110.20(g) by knowingly soliciting a prohibited foreign national contribution from China.

## MURs 7645, 7663, and 7705

- f. Close the file.
- g. Issue appropriate letters

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

Commissioners Broussard, Walther, and Weintraub dissented.

- 3. Decided by a vote of 5-1 to:
  - a. Close the file.
  - b. Send the appropriate letters.

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

July 31, 2022
Date

Attest:

Vicktoria J Allen
Digitally signed by Vicktoria J
Allen
Date: 2022.07.31 18:31:18 -04'00'

Vicktoria J. Allen Acting Deputy Secretary of the Commission

In the Matter of	)	
	)	MUR 7650
Donald J. Trump for President, Inc. and	)	
Bradley Crate, as Treasurer (EPS	)	
Dismissal Report)	)	

### CERTIFICATION

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on December 13, 2021, the Commission decided by a vote of 6-0 to take the following actions in MUR 7650:

- 1. Dismiss the Complaint consistent with the Commission's prosecutorial discretion to determine the proper ordering of its priorities and use of agency resources. *Heckler v. Chaney*, 470 U.S. 821, 831-32 (1985), as recommended in the EPS Dismissal Report dated March 3, 2020, subject to the removal of footnote 3.
- 2. Close the file as to all respondents.
- 3. Send the appropriate letters.

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



Attest:

Laura e Sinram Digitally signed by Laura e Sinram Date: 2021.12.22 13:43:43 -05'00'

Laura E. Sinram
Acting Secretary and Clerk of the
Commission

In the Matter of	)	
	)	MUR 7736
Donald J. Trump for President, Inc. and	)	
Bradley T. Crate, as Treasurer	)	
("Committee"): EPS Dismissal Report	)	

## **CERTIFICATION**

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on April 09, 2021, the Commission decided by a vote of 6-0 to take the following actions in MUR 7736:

- 1. Dismiss the Complaint consistent with the Commission's prosecutorial discretion to determine the proper ordering of its priorities and use of agency resources. *Heckler v. Chaney*, 470 U.S. 821, 831-32 (1985), as recommended in the EPS Dismissal Report dated November 16, 2020.
- 2. Close the file as to all Respondents.
- 3. Send 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: 2021.04.14 17:59:13

-04'00'

Laura E. Sinram
Acting Secretary and Clerk of the

Commission

In the Matter of	)	
	)	MUR 7758
Make America Great Again PAC f/k/a	)	
Donald J. Trump for President and	)	
Bradley Crate in his official capacity as	)	
treasurer; America First Action and Jon	)	
Proch in his official capacity as	)	
treasurer; Committee to Defeat the	)	
President f/k/a Committee to Defend the	)	
President and Ted Harvey in his official	)	
capacity as treasurer; Cory Gardner for	)	
Senate and Lisa Lisker in her official	)	
capacity as treasurer; Cotton for Senate	)	
and Theodore V. Koch in his official	)	
capacity as treasurer; Jason Lewis for	)	
Senate and Bradley Crate in his official	)	
capacity as treasurer; Joni for Iowa and	)	
Cabell Hobbs in his official capacity as	)	
treasurer; Marco Rubio for Senate and	)	
Lisa Lisker in her official capacity as	)	
treasurer; McConnell Senate Committee	)	
and Larry J. Steinberg in his official	)	
capacity as treasurer; Republican	)	
National Committee and Ronald C.	)	
Kaufman in his official capacity as	)	
treasurer; Republican State Leadership	)	
Committee; Scalise for Congress and	)	
Benjamin Ottenhoff in his official	)	
capacity as treasurer; Trump Make	)	
America Great Again Committee and	)	
Bradley Crate in his official capacity as	)	
treasurer	)	

# **CERTIFICATION**

I, Vicktoria J. Allen, recording secretary for the Federal Election Commission executive session on March 08, 2022, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 7758:

- 1. Find no reason to believe that America First Action and Jon Proch in his official capacity as treasurer, Committee to Defeat the President f/k/a Committee to Defend the President and Ted Harvey in his official capacity as treasurer, Cory Gardner for Senate and Lisa Lisker in her official capacity as treasurer, Cotton for Senate and Theodore V. Koch in his official capacity as treasurer, Make America Great Again PAC f/k/a Donald J. Trump for President and Bradley Crate in his official capacity as treasurer, Jason Lewis for Senate and Bradley Crate in his official capacity as treasurer, Joni for Iowa and Cabell Hobbs in his official capacity as treasurer, Marco Rubio for Senate and Lisa Lisker in her official capacity as treasurer, McConnell Senate Committee and Larry J. Steinberg in his official capacity as treasurer, Republican National Committee and Ronald C. Kaufman in his official capacity as treasurer, Republican State Leadership Committee, Scalise for Congress and Benjamin Ottenhoff in his official capacity as treasurer, and Trump Make America Great Again Committee and Bradley Crate in his official capacity as treasurer violated 52 U.S.C. § 30116(a) and (f) by making and receiving excessive contributions.
- 2. Find no reason to believe that America First Action and Jon Proch in his official capacity as treasurer, Committee to Defeat the President f/k/a Committee to Defend the President and Ted Harvey in his official capacity as treasurer, Cory Gardner for Senate and Lisa Lisker in her official capacity as treasurer, Cotton for Senate and Theodore V. Koch in his official capacity as treasurer, Make America Great Again PAC f/k/a Donald J. Trump for President and Bradley Crate in his official capacity as treasurer, Jason Lewis for Senate and Bradley Crate in his official capacity as treasurer, Joni for Iowa and Cabell Hobbs in his official capacity as treasurer, Marco Rubio for Senate and Lisa Lisker in her official capacity as treasurer, McConnell Senate Committee and Larry J. Steinberg in his official capacity as treasurer, Republican National Committee and Ronald C. Kaufman in his official capacity as treasurer, Scalise for Congress and Benjamin Ottenhoff in his official capacity as treasurer, and Trump Make America Great Again Committee and Bradley Crate in his official capacity as treasurer violated 52 U.S.C. § 30104(b)(3) and (b)(6) by failing to report in-kind contributions.
- 3. Approve the Factual and Legal Analysis, as recommended in the First General Counsel's Report dated December 28, 2020, subject to the edits as last circulated by Commissioner Weintraub's Office on March 7, 2022 at 2:15 p.m. and subject to the correction of names as described by counsel at the table.
- 4. Approve the appropriate letters.

## 5. Close the file.

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

March 14, 2022

Date

Attest:

Vicktoria J Allen Digitally signed by Vicktoria J Allen Date: 2022.03.14 15:28:38 -04'00'

Vicktoria J. Allen Acting Deputy Secretary of the Commission

In the Matter of	)	
	)	MUR 7765
Councilwoman Michele Fiore; Donald J.	)	
Trump for President, Inc. and Bradley T.	)	
Crate in his official capacity as treasurer:	)	
Withdrawal and Resubmission of EPS	)	
Dismissal Report	)	

## **CERTIFICATION**

- I, Vicktoria J. Allen, Acting Deputy Secretary of the Federal Election Commission, do hereby certify that on May 11, 2022, the Commission decided by a vote of 6-0 to take the following actions in MUR 7765:
  - 1. Dismiss the Complaint consistent with the Commission's prosecutorial discretion to determine the proper ordering of its priorities and use of agency resources. *Heckler v. Chaney*, 470 U.S. 821, 831-32 (1985), as recommended in the EPS Dismissal Report dated April 27, 2022.
  - 2. Close the file.
  - 3. Send the appropriate letters.

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



Attest:

Vicktoria J Allen Digitally signed by Vicktoria J Allen Date: 2022.05.11 20:15:08 -04'00'

Vicktoria J. Allen Acting Secretary and Clerk of the Commission

In the Matter of	)	
	)	MUR 7784
Make America Great Again PAC f/k/a	)	
Donald J. Trump for President, Inc. and	)	
Bradley T. Crate in his official capacity	)	
as treasurer; Trump Make America Great	)	
Again Committee and Bradley T. Crate	)	
in his official capacity as treasurer;	)	
American Made Media Holding	)	
Corporation, Inc.; American Made Media	)	
Consultants, LLC; Parscale Strategy,	)	
LLC; Sean Dollman; Kimberly	)	
Guilfoyle; Jared Kushner; Bradley J.	)	
Parscale; John Pence; Lara Trump	)	

### CERTIFICATION

I, Vicktoria J. Allen, recording secretary of the Federal Election Commission executive session, do hereby certify that on May 10, 2022, the Commission took the following actions in the above-captioned matter:

- 1. Failed by a vote of 3-3 to:
  - a. Find reason to believe that the Make America Great Again PAC f/k/a Donald J. Trump for President and Bradley T. Crate in his official capacity as treasurer violated 52 U.S.C. § 30104(b)(5)(A) and 11 C.F.R. § 104.3(b) by misreporting the payees of payments made to America Made Media Consultants, LLC., and Parscale Strategy, LLC.
  - b. Find reason to believe that the Trump Make America Great Again Committee and Bradly T. Crate in his official capacity as treasurer violated 52 U.S.C. § 30104(b)(5)(A) and 11 C.F.R. § 104.3(b) by misreporting the payees of payments made to America Made Media Consultants, LLC.

- c. Find reason to believe that the Make America Great Again PAC f/k/a Donald J. Trump for President and Bradley T. Crate in his official capacity as treasurer violated 52 U.S.C. § 30104(b)(5)(A) and 11 C.F.R. § 104.3(b) by misreporting the purpose of payments made to Parscale Strategy.
- d. Take no action at this time with regard to whether the Make America Great Again PAC f/k/a Donald J. Trump for President and Bradley T. Crate in his official capacity as treasurer violated 52 U.S.C. § 30104(b)(5)(A) and 11 C.F.R. § 104.3(b) by misreporting the purpose of payments made to America Made Media Consultants, LLC.
- e. Find no reason to believe the allegation that American Made Media Holding Corporation, Inc., America Made Media Consultants, LLC, Parscale Strategy, LLC, Sean Dollman, Kimberly Guilfoyle, Jared Kushner, Bradley Parscale, John Pence, and Lara Trump violated 52 U.S.C. § 30104(b)(5)(A) and 11 C.F.R. § 104.3(b) and close the file as to these Respondents.
- f. Approve the Factual and Legal Analyses, as recommended in the First General Counsel's Report dated April 6, 2022, subject to the edits circulated by Commissioner Weintraub's Office on April 25, 2022 at 10:16 p.m.
- g. Authorize compulsory process.
- 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 pursuant to *Heckler v. Chaney*.
  - b. Close the file.
  - c. Issue the appropriate letters.

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

Commissioners Broussard, Walther, and Weintraub dissented.

- 3. Failed by a vote of 3-3 to:
  - a. Find reason to believe that the Make America Great PAC f/k/a Donald J. Trump for President and Bradley T. Crate in his official capacity as treasurer violated 52 U.S.C. § 30104(b)(5)(A) and 11 C.F.R. § 104.3(b) by misreporting the purpose of payments made to Parscale Strategy.
  - b. Approve the corresponding section of the Factual and Legal Analyses, as recommended in the First General Counsel's Report dated April 6, 2022.

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

Commissioners Cooksey, Dickerson, and Trainor dissented.

- 4. Decided by a vote of 4-2 to:
  - a. Close the file.
  - b. Send the appropriate letters.

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



Attest:

Vicktoria J Allen Allen Date:

Digitally signed by Vicktoria J Allen

Date: 2022.05.11 17:57:23 -04'00'

Vicktoria J. Allen Acting Deputy Secretary of the Commission

In the Matter of	)	
	)	MUR 7787
Republican National Committee and	)	
Ronald Kaufman, as Treasurer; Donald J.	)	
Trump for President, Inc. and Bradley	)	
Crate, as Treasurer; Trump Make	)	
America Great Again Committee and	)	
Bradley Crate, as Treasurer (EPS	)	
Dismissal Report)	)	

## **CERTIFICATION**

I, Laura E. Sinram, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on May 26, 2021, the Commission decided by a vote of 6-0 to take the following actions in MUR 7787:

- 1. Dismiss the complaint consistent with the Commission's prosecutorial discretion to determine the proper ordering of its priorities and use of agency resources. *Heckler v. Chaney*, 470 U.S. 821, 831-32 (1985), as recommended in the EPS Dismissal Report dated May 12, 2021.
- 2. Close the file as to all respondents.
- 3. Send 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: 2021.05.27 14:31:13 -04'00'

Laura E. Sinram
Acting Secretary and Clerk of the
Commission

In the Matter of	)	
	)	MUR 7867
Our American Century PAC and Cabell	)	
Hobbs in his official capacity as	)	
treasurer; Make America Great Again	)	
PAC and Bradley T. Crate in his official	)	
capacity as treasurer	)	

#### CERTIFICATION

I, Vicktoria J. Allen, recording secretary of the Federal Election Commission executive session, do hereby certify that on March 22, 2022, the Commission took the following actions in the above-captioned matter:

- 1. Failed by a vote of 3-3 to:
  - a. Find reason to believe that Our American Century PAC and Cabell Hobbs in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b) and 30116(a) and 11 C.F.R. §§ 104.3(b) and 110.1(b) by making and failing to report prohibited and excessive contributions.
  - Find reason to believe that Our American Century PAC and Cabell Hobbs in his official capacity as treasurer violated 52 U.S.C.
     § 30120(a) and 11 C.F.R. § 110.11 by failing to include valid disclaimers.
  - c. Dismiss the allegation that Make America Great Again PAC and Bradley T. Crate in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b) and 30116(f) and 11 C.F.R. §§ 104.3(a) and 110.9 by knowingly accepting and failing to report excessive contributions.
  - d. Dismiss as a matter of prosecutorial discretion the allegation that Our American Century PAC and Cabell Hobbs in his official

- capacity as treasurer accepted excessive contributions in violation of 52 U.S.C. § 30116(f) and 11 C.F.R. § 110.9.
- e. Authorize the use of compulsory process.
- f. Approve the Factual and Legal Analyses, as recommended in the First General Counsel's Report dated October 27, 2021, subject to the edits as last circulated by Commissioner Weintraub's Office on March 22, 2022 at 12:54 p.m.
- g. 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 2-4 to:
  - a. Find no reason to believe that Our American Century PAC and Cabell Hobbs in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b) and 30116(a) and 11 C.F.R. §§ 104.3(b) and 110.1(b) by making and failing to report prohibited and excessive contributions.
  - b. Dismiss as a matter of prosecutorial discretion the allegation that Our American Century PAC and Cabell Hobbs in his official capacity as treasurer violated 52 U.S.C. § 30120(a) and 11 C.F.R. § 110.11 by failing to include valid disclaimers.
  - c. Find no reason to believe that Make America Great Again PAC and Bradley T. Crate in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b) and 30116(f) and 11 C.F.R. §§ 104.3(a) and 110.9 by knowingly accepting and failing to report excessive contributions.
  - d. Find no reason to believe that Our American Century PAC and Cabell Hobbs in his official capacity as treasurer accepted excessive contributions in violation of 52 U.S.C. § 30116(f) and 11 C.F.R. § 110.9.
  - e. Close the file.
  - f. Approve the appropriate letters.

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

March 24, 2022 Date Attest:

Vicktoria J Allen Digitally signed by Vicktoria J Allen Date: 2022.03.24 20:14:49 -04'00'

Vicktoria J. Allen Acting Deputy Secreta of the Commission

In the Matter of	)	
	)	MUR 7867
Our American Century PAC and Cabell	)	
Hobbs in his official capacity as	)	
treasurer; Make America Great Again	)	
PAC and Bradley T. Crate in his official	)	
capacity as treasurer	)	

### **CERTIFICATION**

I, Vicktoria J. Allen, recording secretary for the Federal Election Commission executive session on April 05, 2022, do hereby certify that the Commission failed by a vote of 2-4 to take the following actions in MUR 7867:

- 1. Dismiss as a matter of prosecutorial discretion the allegation that Our American Century PAC and Cabell Hobbs in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b) and 30116(a) and 11 C.F.R. §§ 104.3(b) and 110.1(b) by making and failing to report prohibited and excessive contributions.
- Find reason to believe that Our American Century PAC and Cabell Hobbs in his official capacity as treasurer violated 52 U.S.C. § 30120(a) and 11 C.F.R. § 110.11 by failing to include valid disclaimers.
- 3. Find no reason to believe that Make America Great Again PAC and Bradley T. Crate in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b) and 30116(f) and 11 C.F.R. §§ 104.3(a) and 110.9 by knowingly accepting and failing to report excessive contributions.
- 4. Find no reason to believe that Our American Century PAC and Cabell Hobbs in his official capacity as treasurer accepted excessive contributions in violation of 52 U.S.C. § 30116(f) and 11 C.F.R. § 110.9.

- 5. Approve the Factual and Legal Analyses as circulated by the Office of General Counsel on April 4 at 9:24 a.m.
- 6. Authorize conciliation prior to a finding of probable cause to believe with Our American Century PAC and Cabell Hobbs in his official capacity as treasurer.
- 7. Instruct the Office of General Counsel to draft a conciliation agreement consistent with the Factual and Legal Analysis
- 8. Approve the appropriate letters.

Commissioners Dickerson and Trainor voted affirmatively for the motion.

Commissioners Broussard, Cooksey, Walther, and Weintraub dissented.

Attest:

Vicktoria J Allen Allen

Digitally signed by Vicktoria J Allen Date: 2022.04.08 13:17:59 -04'00'

Vicktoria J. Allen Acting Deputy Secretary of the Commission



In the Matter of	)	
	)	MUR 7867
Our American Century PAC and Cabell	)	
Hobbs in his official capacity as	)	
treasurer; Make America Great Again	)	
PAC and Bradley T. Crate in his official	)	
capacity as treasurer	)	

### **CERTIFICATION**

I, Vicktoria J. Allen, recording secretary for the Federal Election Commission executive session on April 26, 2022, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions in MUR 7867:

- Find reason to believe that Our American Century PAC and Cabell Hobbs in his official capacity as treasurer violated 52 U.S.C. § 30120(a) and 11 C.F.R. § 110.11 by failing to include valid disclaimers.
- 2. Approve the Factual and Legal Analysis as circulated by the Office of General Counsel on April 4, 2022 at 9:24 a.m., and subject to the edit made at the table to revise page 1, line 26 which refers to "then president candidate Joseph R. Biden" to refer to "then candidate Joseph R. Biden."
- 3. Authorize conciliation prior to a finding of probable cause to believe in Our American Century PAC and Cabell Hobbs in his official capacity as treasurer.
- 4. Instruct the Office of General Counsel to draft a conciliation agreement consistent with the Factual and Legal Analysis
- 5. Approve the appropriate letters.

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

April 28, 2022
Date

Attest:

Vicktoria J Allen Date: 2022.04.28 19:08:39 -04'00'

Vicktoria J. Allen Acting Deputy Secretary of the Commission

In the Matter of	)	
	)	MUR 7867
Proposed Conciliation Agreement for	)	
(Our American Century)	)	

## **CERTIFICATION**

- I, Vicktoria J. Allen, Acting Deputy Secretary of the Federal Election Commission, do hereby certify that on June 02, 2022, the Commission decided by a vote of 4-2 to take the following actions in MUR 7867:
  - 1. Approve the conciliation agreement, as recommended in the Memorandum to the Commission dated May 19, 2022.
  - 2. Send the appropriate letters.

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

June 2, 2022

Vicktoria J Allen

Allen

Date: 2022.06.02 11:17:51 -04'00'

Vicktoria J. Allen

Acting Deputy Secretary of the

Commission

In the Matter of	)	
	)	MUR 7867
Our American Century	)	
(Recommendation to Accept the Signed	)	
Conciliation Agreement)	)	

## **CERTIFICATION**

I, Vicktoria J. Allen, Acting Deputy Secretary of the Federal Election Commission, do hereby certify that on August 08, 2022, the Commission decided by a vote of 4-2 to take the following actions in MUR 7867:

- 1. Accept the conciliation agreement, as recommended in the Memorandum to the Commission dated July 1, 2022.
- 2. Approve the appropriate letters.
- 3. Close the file.

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

August 8, 2022

Vicktoria J Allen
Date: 2022.08.08 17:10:47
-04'00'

Vicktoria J. Allen
Acting Deputy Secretary of the
Commission