



**APPROVED OCTOBER 26, 2022**

**MINUTES OF AN OPEN MEETING  
OF THE  
FEDERAL ELECTION COMMISSION  
THURSDAY, JULY 28, 2022<sup>1</sup>**

**PRESENT:**

**Allen Dickerson, Chairman**

**Steven T. Walther, Vice Chair**

**Shana M. Broussard, Commissioner**

**Sean J. Cooksey, Commissioner**

**James E. "Trey" Trainor III, Commissioner**

**Ellen L. Weintraub, Commissioner**

**Alec Palmer, Staff Director**

**Lisa Stevenson, Acting General Counsel**

**Laura E. Sinram, Acting Secretary and Clerk**

**Vicktoria J. Allen, Acting Deputy Secretary<sup>2</sup>**

**Maureen Benitz, Program Management Analyst<sup>3</sup>**

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<sup>1</sup> This meeting was conducted as a hybrid meeting with virtual and in-person participants.

<sup>2</sup> Acting Deputy Secretary Vicktoria Allen was the recording secretary for the meeting.

<sup>3</sup> Program Management Analyst Maureen Benitz moderated the meeting.

**Chairman Allen Dickerson called the Federal Election Commission to order in an open meeting at 10:05 A.M. on Thursday, July 28, 2022 with a quorum present.**

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**Chairman Dickerson stated that there were late submitted documents and recognized Vice Chair Walther who**

**MOVED to suspend the rules on the timely submission of agenda documents in order that the Commission may consider the late submission of Agenda Documents No. 22-28-C and 22-34-A.**

**The motion carried by a vote of 6-0 with Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voting affirmatively for the decision.**

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**I. DRAFT ADVISORY OPINION 2022-06**

**Hispanic Leadership Trust by Chris K. Gober, Esq. and Eric Wang, Esq.**

**Agenda Document No. 22-28-A (Draft A)**

**Agenda Document No. 22-28-B (Draft B)**

**Agenda Document No. 22-28-C (Draft C)  
(Submitted Late)**

**(Held over from the meetings of June 23, 2022 and July 14, 2022)**

**Chairman Dickerson recognized Mr. Eric Wang on behalf of the requestor.**

**Mr. Wang participated in the discussion that followed.**

**Chairman Dickerson recognized Commissioner Cooksey who**

**MOVED to approve Agenda Document No. 22-28-C,  
which is Draft C.**

**Discussion followed.**

**Chairman Dickerson called the vote. The motion carried by a vote of 5-1 with Commissioners Broussard, Cooksey, Dickerson, Trainor, and Walther voting affirmatively for the decision. Commissioner Weintraub dissented.**

**II. DRAFT ADVISORY OPINION 2022-10**

**Sprinkle by David Lazarus, Esq.**

**Agenda Document No. 22-34-A (Draft A)  
(Submitted Late)**

**Chairman Dickerson recognized Mr. Tony Buckley of the General Counsel's Office and Mr. David Lazarus on behalf of the requestor. Mr. Buckley presented the matter. Sprinkle asks if its proposed web-based contribution platform would result in prohibited contributions by Sprinkle and whether its proposed use of Commission data to supplement its services to contributors is permissible. The draft concludes that, consistent with prior advisory opinions, Sprinkle's services**

**will not result in prohibited contributions by Sprinkle to any candidate and that Sprinkle's proposed use of Commission data is permissible.**

**Chairman Dickerson recognized Commissioner Cooksey who**

**MOVED to approve Agenda Document No. 22-34-A,  
which is Draft A.**

**Chairman Dickerson stated, for the record, that he "will not be able to support the motion."**

**Discussion followed.**

**Chairman Dickerson called the vote. The motion carried by a vote of 5-1 with Commissioners Broussard, Cooksey, Trainor, Walther, and Weintraub voting affirmatively for the decision. Commissioner Dickerson dissented.**

**III. RESUBMISSION - AUDIT DIVISION RECOMMENDATION MEMORANDUM ON THE KENTUCKY STATE DEMOCRATIC CENTRAL EXECUTIVE COMMITTEE (A19-13)**

**Memorandum from the Chief Compliance Officer and the Audit Division dated May 25, 2022**

**Agenda Document No. 22-31-A**

**Chairman Dickerson recognized Mr. Terry O'Brien of the Audit Division who presented the matter. Mr. O'Brien highlighted the five (5) findings within the Memorandum: 1) Misstatement of Financial Activity; 2) Receipt of Contributions in Excess of the Limit; 3) Recordkeeping for Employees; 4)**

**Excessive Coordinated Party Expenditures; and 5) Failure to File a 24-Hour Report.**

**Discussion followed.**

**Chairman Dickerson recognized Commissioner Trainor who**

**MOVED to approve Findings 1 and 3 of the Resubmission – Audit Division Recommendation Memorandum on the Kentucky State Democratic Central Executive Committee, as recommended in the Memorandum from the Chief Compliance Officer and the Audit Division dated May 25, 2022.**

**The motion carried by a vote of 6-0 with Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voting affirmatively for the decision.**

**Chairman Dickerson recognized Commissioner Weintraub who**

**MOVED to approve Findings 2 and 5 of the Resubmission – Audit Division Recommendation Memorandum on the Kentucky State Democratic Central Executive Committee, as recommended in the Memorandum from the Chief Compliance Officer and the Audit Division dated May 25, 2022.**

**The motion failed by a vote of 3-3 with Commissioners Broussard, Walther, and Weintraub voting affirmatively for the motion. Commissioners Cooksey, Dickerson, and Trainor dissented.**

**Ms. Dayna Brown of the Audit Division participated in the discussion that followed.**

**IV. RESUBMISSION - AUDIT DIVISION RECOMMENDATION MEMORANDUM ON THE DEMOCRATIC PARTY OF ARKANSAS (A19-15)**

**Memorandum from the Chief Compliance Officer and the Audit Division dated May 27, 2022**

**Agenda Document No. 22-30-A**

**Chairman Dickerson recognized Mr. David Butler of the Audit Division and Mr. Kendrick Smith of the Audit Division. Mr. Smith highlighted the four (4) findings within the Memorandum: 1) Reporting of Debts and Obligations; 2) Recordkeeping for Employees; 3) Reporting of Media-Related Expenditures; and 4) Disclosure of Loans and Loan Repayments.**

**Discussion followed.**

**Chairman Dickerson recognized Commissioner Trainor who**

**MOVED to approve Findings 1, 2, and 4 of the Resubmission – Audit Division Recommendation Memorandum on the Democratic Party of Arkansas, as recommended in the Memorandum from the Chief Compliance Officer and the Audit Division dated May 27, 2022.**

**The motion carried by a vote of 6-0 with Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voting affirmatively for the decision.**

**V. PROPOSED FINAL AUDIT REPORT ON THE ASSOCIATION FOR EMERGENCY RESPONDERS AND FIREFIGHTERS, PAC (A19-21)**

**Memorandum from the Chief Compliance Officer and the Audit Division dated June 16, 2022**

**Agenda Document No. 22-32-A**

**Chairman Dickerson recognized Ms. Zuzana Pacious of the Audit Division who presented the matter. Ms. Pacious highlighted the one (1) finding within the Memorandum: Increased Activity (Corrected). The Additional Issue section consists of Recordkeeping for Disbursements and Use of Designated Depository.**

**Discussion followed.**

**Chairman Dickerson recognized Commissioner Weintraub who**

**MOVED to approve the Proposed Final Audit Report on the Association for Emergency Responders and Firefighters, PAC (A19-21), as recommended in the Memorandum from the Chief Compliance Officer and the Audit Division dated June 16, 2022.**

**The motion carried by a vote of 6-0 with Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voting affirmatively for the decision.**

**VI. PROPOSED FINAL AUDIT REPORT ON THE US VETERANS ASSISTANCE FOUNDATION, PAC (A19-06)**

**Memorandum from the Chief Compliance Officer and the Audit Division dated June 21, 2022**

**Agenda Document No. 22-33-A**

**Chairman Dickerson recognized Ms. Michelle Grant of the Audit Division who presented the matter. Ms. Grant highlighted the four (4) findings in the Memorandum: 1) Misstatement of Financial Activity; 2) Increased Activity; 3)**

**Disclosure of Occupation and Name of Employer; and 4) Failure to File 24/48 – Hour reports. The Additional Issues section consists of Issue 1: Disclosure of Disbursements and Issue 2: Recordkeeping for Disbursements and Use of Designated Depository.**

**Chairman Dickerson recognized Commissioner Weintraub who**

**MOVED to approve the Proposed Final Audit Report on the US Veterans Assistance Foundation, PAC (A19-06), as recommended in the Memorandum from the Chief Compliance Officer and the Audit Division dated June 21, 2022.**

**The motion carried by a vote of 6-0 with Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voting affirmatively for the decision.**

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**Chairman Dickerson and Commissioners Broussard and Weintraub took a moment of personal privilege to recognize Vice Chair Walther for his many years of service to the Commission and to wish him well in his retirement.**

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**VII. MANAGEMENT AND ADMINISTRATIVE MATTERS**

**There being no further business to come before the Commission, the meeting adjourned at 10:35 A.M.**



**Signed:**

A handwritten signature in blue ink, appearing to read "Allen J. Dickerson", written over a horizontal line.

**Allen J. Dickerson  
Chairman of the Commission (2022)**

**Attest:**

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