



**APPROVED OCTOBER 18, 2023**

**MINUTES OF AN OPEN MEETING  
OF THE  
FEDERAL ELECTION COMMISSION  
WEDNESDAY, AUGUST 30, 2023<sup>1</sup>**

**PRESENT:**

**Dara Lindenbaum, Chair, presiding**

**Sean J. Cooksey, Vice Chairman**

**Shana M. Broussard, Commissioner**

**Allen J. Dickerson, Commissioner**

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

**Ellen L. Weintraub, Commissioner**

**Alec Palmer, Staff Director**

**Lisa Stevenson, Acting General Counsel**

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

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

**Maureen Benitz, Management and Program 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> Deputy Secretary Vicktoria Allen was the recording secretary for the meeting.

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

**Chair Dara Lindenbaum called the Federal Election Commission to order in an open meeting at 10:32 A.M. on Wednesday, August 30, 2023 with a quorum present.**

**I. PROPOSED DIRECTIVE REGARDING INVESTIGATIONS CONDUCTED BY THE OFFICE OF GENERAL COUNSEL**

**Memorandum from Commissioner Allen J. Dickerson dated August 23, 2023**

**Agenda Document No. 23-21-A**

**This matter was held over to a future meeting.**

**II. PROPOSED FINAL AUDIT REPORT ON THE COMMUNICATIONS WORKERS OF AMERICA – COPE POLITICAL CONTRIBUTIONS COMMITTEE (A21-09)**

**Memorandum to the Commission dated July 6, 2023**

**Agenda Document No. 23-18-A**

**(Held over from the meeting of August 10, 2023)**

**Chair Lindenbaum recognized Chief Compliance Officer Patricia Orrock.**

**Chair Lindenbaum also recognized Ms. Dayna Brown and Mr. Christopher Carrell of the Audit Division. Mr. Carrell highlighted the two findings within the Memorandum: 1) Misstatement of Financial Activity and 2) Disclosure of Occupation and/or Name of Employer.**

**Ms. Brown participated in the discussion that followed.**

**Chair Lindenbaum recognized Commissioner Weintraub who**

**MOVED to approve the Proposed Final Audit Report on the Communications Workers of America – COPE Political Contributions Committee (A21-09), as recommended in the Memorandum from the Chief Compliance Officer and the Audit Division dated July 6, 2023, subject to the deletion of the line “As such, CWA did not materially correct the public record.” on pages 3, 6, and 12.**

**Discussion followed.**

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

**III. AUDIT DIVISION RECOMMENDATION MEMORANDUM ON STEVE DAINES FOR MONTANA (A21-04)**

**Memorandum to the Commission dated May 25, 2023**

**Agenda Document No. 23-15-A**

**(Held over from the meetings of July 13, 2023 and August 10, 2023)**

**Chair Lindenbaum recognized Mr. Kendrick Smith, Ms. Camilla Reminsky, and Ms. Erica Lee of the Audit Division. Ms. Reminsky highlighted the three findings within the Memorandum: 1) Receipt of Contributions in Excess of the Limit, 2) Disclosure of Debts and Obligations, and 3) Disclosure of Receipts.**

**Ms. Lee, Ms. Brown, Ms. Reminsky, and Mr. Smith of the Audit Division participated in the discussion that followed.**

**Chair Lindenbaum recognized Commissioner Weintraub who**

**MOVED to approve the Audit Division Recommendation Memorandum on Steve Daines for Montana (A21-04), as recommended in the Memorandum from the Chief Compliance Officer and the Audit Division dated May 25, 2023.**

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

**Discussion continued.**

**Chair Lindenbaum recognized Commissioner Weintraub who**

**MOVED to find that SDFM failed to disclose debts and obligations totaling \$373,967.**

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

**Discussion continued.**

**Chair Lindenbaum recognized Vice Chairman Cooksey who**

**MOVED to approve Finding 2: Disclosure of Debts and Obligations subject to reducing in the ADRM's amount in violation by \$108,750 for a new amount in violation of \$265,217 and making any corresponding technical and conforming changes in the proposed final audit report.**

**Discussion continued.**

**Vice Chairman Cooksey withdrew his motion.**

**Chair Lindenbaum recognized Vice Chairman Cooksey who**

**MOVED to approve Finding 2: Disclosure of Debts and Obligations with an amount in violation of \$265,217.**

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

**Discussion continued.**

**Chair Lindenbaum recognized Commissioner Weintraub who**

**MOVED to find that SDFM failed to correctly disclose receipts totaling \$948,218.**

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

**Ms. Brown participated in the continuing discussion.**

**IV. AUDIT DIVISION RECOMMENDATION MEMORANDUM ON CITIZENS FOR WATERS (A21-01)**

**Memorandum to the Commission dated July 21, 2023**

**Agenda Document No. 23-17-A**

**(Held over from the meeting of August 10, 2023)**

**This matter was held over to a future meeting.**

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**Chair Lindenbaum recognized Commissioner Dickerson for a point of personal privilege. Commissioner Dickerson acknowledged the passing of**

**former Senator James L. Buckley and his influence on campaign finance regulations.**

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**V. MANAGEMENT AND ADMINISTRATIVE MATTERS**

**There being no further business to come before the Commission, the meeting adjourned at 11:05 A.M.**

**Signed:**

A handwritten signature in black ink, appearing to read 'Dara Lindenbaum', written in a cursive style.

**Dara Lindenbaum  
Chair of the Commission**

**Attest:**

**Vicktoria J. Allen  
Deputy Secretary of the Commission**

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