



APPROVED MARCH 30, 2022

**MINUTES OF AN OPEN MEETING
OF THE
FEDERAL ELECTION COMMISSION
THURSDAY, DECEMBER 2, 2021¹**

PRESENT:

Shana M. Broussard, Chair, presiding

Allen Dickerson, Vice Chair

Sean J. Cooksey, Commissioner

James E. "Trey" Trainor III, Commissioner

Steven T. Walther, 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 Secretary²

Maureen Benitz, Management and Program Analyst³

¹ The meeting was conducted virtually.

² Acting Deputy Secretary Vicktoria Allen was the recording secretary for the meeting.

³ Management and Program Analyst Maureen Benitz moderated the meeting.

Chair Shana M. Broussard called the Federal Election Commission to order in an open meeting at 10:32 A.M. on Thursday, December 2, 2021 with a quorum present.

Chair Broussard recognized Vice Chair Dickerson who

MOVED that the Commission consider Audit Division Recommendation Memorandum on the Republican Party of Minnesota – Federal (A19-09) and that the Commission determine pursuant to 11 C.F.R. § 2.7(d)(1) that business so requires and that no earlier public announcement was possible.

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

I. DRAFT ADVISORY OPINION 2021-11

DSCC and DCCC by Marc E. Elias, Esq., Jacquelyn K. Lopez, Esq., Rachel L. Jacobs, Esq., Shanna M. Reulbach, Esq., and Elizabeth P. Poston, Esq.

Agenda Document No. 21-40-A (Draft A)

Agenda Document No. 21-40-B (Draft B)

(Held over from the meeting of November 10, 2021)

This matter was held over to a future meeting.

Mr. James Jones of the Information Division requested that the meeting be momentarily paused to address a technical issue. Chair Broussard consented.

**II. AUDIT DIVISION RECOMMENDATION MEMORANDUM ON THE
REPUBLICAN PARTY OF MINNESOTA – FEDERAL (A19-09)**

**Memorandum from the Chief Compliance Officer and Audit Division
dated November 10, 2021**

Agenda Document No. 21-42-A

Chair Broussard recognized Ms. Brenda Wheeler and Rickida Morcomb of the Audit Division. Ms. Wheeler highlighted the six findings within the Memorandum: 1) Recordkeeping for Employees; 2) Recordkeeping for Communications; 3) Reporting of Apparent Independent Expenditures; 4) Disclosure of Transfers and Allocation Ratios; 5) Excessive Coordinated Party Expenditures; and 6) Disclosure of Loans and Loan Repayments.

Chair Broussard recognized Commissioner Trainor who

MOVED to take the following actions:

- 1. Adopt the recommendations with the exception of Findings 3 and 5, as recommended in the Memorandum from the Chief Compliance Officer and the Audit Division dated November 10, 2021.**
- 2. Direct the Audit Division to make any necessary conforming edits.**

Discussion followed regarding the motion.

Commissioner Trainor withdrew his motion to allow Commissioner Weintraub to make a motion.

Chair Broussard recognized Commissioner Weintraub who

MOVED to approve the Audit Division Recommendation Memorandum on the Republican Party of Minnesota – Federal (A19-09), as recommended in the Memorandum from the Chief Compliance Officer and the Audit Division dated November 10, 2021

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.

Chair Broussard recognized Commissioner Trainor who

MOVED to take the following actions:

- 1. Adopt the recommendations with the exception of Findings 3 and 5, as recommended in the Memorandum from the Chief Compliance Officer and the Audit Division dated November 10, 2021.**
- 2. Direct the Audit Division to make any necessary conforming edits.**

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

III. MANAGEMENT AND ADMINISTRATIVE MATTERS

There being no further business to come before the Commission, the meeting adjourned at 10:38 A.M.

Signed:

A handwritten signature in blue ink that reads "Shana M. Broussard". The signature is written in a cursive style with a large initial 'S'.

**Shana M. Broussard
Chair of the Commission (2021)**

Attest:

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