BEFORE THE FEDERAL ELECTION COMMISSION

| In the Matter of |) | |
|--|---|---------------------------|
| |) | AO 2005-20 |
| Pillsbury Winthrop Shaw Pittman by Ms. |) | Agenda Document No. 06-02 |
| Kathryn E. Donovan |) | |
| | | |

CERTIFICATION

I, Mary W. Dove, recording secretary for the Federal Election Commission open meeting on January 19, 2006, do hereby certify that the Commission decided by a vote of 6-0 to approve Draft A of Advisory Opinion 2005-20, as set forth in Agenda Document No. 06-02, subject to revisions pursuant to the meeting discussion.

Commissioners Lenhard, Mason, Toner, von Spakovsky, Walther, and Weintraub voted affirmatively for the decision.

Attest:

January 19, 2006

W. Dove

Secretary of the Commission