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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Highway 31 and Edward Still in his)
official capacity as treasurer; Senate)
Majority PAC ("SMP") and Rebecca)
Lambe in her official capacity as)
treasurer; Priorities USA Action and)
Greg Speed in his official capacity as)
treasurer; Bully Pulpit Interactive;)
Waterfront Strategies; Putnam Partners;)
Nutt Labs; ZUUR; Denise Nelson)
Voiceovers)

CERTIFICATION

I, Laura E. Sinram, recording secretary for the Federal Election Commission executive session on July 25, 2019, do hereby certify that the Commission decided by a vote of 4-0 to:

1. Find reason to believe Highway 31 and Edward Still in his official capacity as treasurer failed to report contributions in the form of extensions of credit in violation of 52 U.S.C. § 30104(b)(3)(A).
2. Find no reason to believe Bully Pulpit Interactive, Waterfront Strategies, Denise Nelson Voiceovers, Nutt Labs, Putnam Partners, and ZUUR violated the Act in this matter.
3. Take no action at this time as to the allegation that Highway 31 and Edward Still in his official capacity as treasurer and Senate Majority PAC and Rebecca Lambe in her official capacity as treasurer violated 52 U.S.C. § 30104 by failing to accurately report contributions in the form of a guarantee by SMP for Highway 31's debts.
4. Dismiss the allegation that Highway 31 violated 52 U.S.C. § 30104(b)(3) by misreporting the identity of a contributor and direct Highway 31 to work with the Reports Analysis Division to amend its reports.

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5. Find no reason to believe Priorities USA Action and Greg Speed in his official capacity as treasurer violated 52 U.S.C. § 30104.
6. Find no reason to believe Highway 31 and Edward Still in his official capacity as treasurer failed to properly report debts and obligations, or disbursements in violation of 52 U.S.C. § 30104(b)(4).
7. Approve the Factual and Legal Analysis, as recommended in the First General Counsel's Report dated March 8, 2019.
8. Authorize the use of compulsory process, including the issuance of appropriate interrogatories, document subpoenas, and deposition subpoenas, as necessary.
9. Close the file as to Bully Pulpit Interactive, Waterfront Strategies, Denise Nelson Voiceovers, Nutt Labs, Putnam Partners, ZUUR, and Priorities USA Action and Greg Speed in his official capacity as treasurer.
10. Approve the appropriate letters.

Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

Attest:

7/29/19

Date

Laura E. Sinram

Laura E. Sinram
Acting Secretary and Clerk of the Commission