

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 7401
 George G. Lombardi; America First-)
 Team Manatee, Inc.; Citizens for Trump;)
 Coalition for Trump; Coalition for Trump)
 Superstore; Corey Lewandowski; Donald)
 J. Trump; Donald J. Trump for President,)
 Inc. and Bradley T. Crate in his official)
 capacity as treasurer; Jack Posobiec;)
 Latinos for Trump (aka Latinos with)
 Trump); Madeline Moreira; Michael)
 Cernovich; Patriotic Warriors LLC;)
 Reince Priebus; Robert Jeter; Sam)
 Clovis; Tim Clark; Tim Selaty, Sr.)

CERTIFICATION

I, Laura E. Sinram, recording secretary of the Federal Election Commission executive session, do hereby certify that on July 11, 2019, the Commission took the following actions in the above-captioned matter, subject to the Notice of Errata Memorandum dated April 2, 2019:

1. Failed by a vote of 2-2 to:
 - a. Find reason to believe that Citizens for Trump violated 52 U.S.C. §§ 30102, 30103, and 30104.
 - b. Take no action at this time with regard to the allegations that George G. Lombardi, Patriotic Warriors, and Tim Selaty, Sr. violated 52 U.S.C. §§ 30102, 30103, and 30104.
 - c. Find reason to believe that Coalition for Trump, Coalition for Trump Superstore, and Robert Jeter violated 52 U.S.C. § 30124(b).
 - d. Take no action at this time with regard to whether George G. Lombardi violated 52 U.S.C. § 30124(b).

- e. Find no reason to believe that Jack Posobiec and Michael Cernovich violated 52 U.S.C. § 30121.
- f. Dismiss the allegations that America First-Team Manatee, Inc., Citizens for Trump, Coalition for Trump, Coalition for Trump Superstore, Corey Lewandowski, Donald J. Trump, Donald J. Trump for President, Inc., and Bradley T. Crate in his official capacity as treasurer, George G. Lombardi, Jack Posobiec, Latinos for Trump (aka Latinos with Trump), Madeline Moreira, Michael Cernovich, Patriotic Warriors LLC, Reince Priebus, Robert Jeter, Sam Clovis, Tim Clark, and Tim Selaty, Sr. violated 52 U.S.C. §§ 30116 and 30118 and 11 C.F.R. § 109.21 by making and accepting prohibited contributions in the form of coordinated communications or expenditures.
- g. Take no action at this time against Coalition for Trump regarding the foreign national allegations.
- h. Approve the Factual and Legal Analyses, as recommended in the First General Counsel's Report dated February 28, 2019,
- i. Authorize the use of compulsory process, including the issuance of appropriate interrogatories, document subpoenas, and deposition subpoenas, as necessary.
- j. Approve the appropriate letters.

Commissioners Walther and Weintraub voted affirmatively for the motion.

Commissioners Hunter and Petersen dissented.

2. Decided by a vote of 4-0 to:

- a. Find reason to believe that Citizens for Trump violated 52 U.S.C. §§ 30102, 30103, and 30104 and approve the Office of General Counsel's corresponding Factual and Legal Analysis, subject to the edits last circulated by Chair Weintraub's Office on July 9, 2019.
- b. Take no action at this time with regard to the allegations that George G. Lombardi, Patriotic Warriors, and Tim Selaty, Sr. violated 52 U.S.C. §§ 30102, 30103, and 30104.
- c. Take no action at this time against Coalition for Trump regarding the foreign national allegations.
- d. Take no action at this time with regard to whether George G. Lombardi violated 52 U.S.C. § 30124(b).
- e. Find no reason to believe that Jack Posobiec and Michael Cernovich violated 52 U.S.C. § 30121 and approve the Office of General Counsel's Factual and Legal Analyses subject to the edits last circulated by the Office of General Counsel on Wednesday, July 10, 2019 at 3:19 p.m.
- f. Dismiss the allegations that America First-Team Manatee, Inc., Citizens for Trump, Coalition for Trump, Coalition for Trump Superstore, Corey Lewandowski, Donald J. Trump, Donald J. Trump for President, Inc., and Bradley T. Crate in his official capacity as treasurer, George G. Lombardi, Jack Posobiec, Latinos for Trump (aka Latinos with Trump), Madeline Moreira, Michael Cernovich, Patriotic Warriors LLC, Reince Priebus, Robert Jeter, Sam Clovis, Tim Clark, and Tim Selaty, Sr. violated 52 U.S.C. §§ 30116 and 30118 and 11 C.F.R. § 109.21 by making and accepting prohibited contributions in the form of coordinated communications or expenditures and direct the Office of General Counsel to prepare corresponding Factual and Legal Analyses that confirm to the edits last circulated by Chair Weintraub's Office on July 9, 2019.
- g. Authorize the use of compulsory process, including the issuance of appropriate interrogatories, document subpoenas, and deposition subpoenas, as necessary.
- h. Approve the appropriate letters.

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

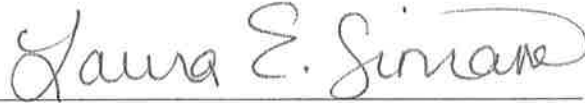
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Attest:

7/15/19

Date



Laura E. Sinram
Acting Secretary and Clerk of the
Commission