



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

Citizens for Trump  
Patriotic Warriors, LLC  
Timothy Selaty, Sr.

May 5, 2022

Spring, Texas 77382

RE: MUR 7401

Dear Mr. Selaty:

On June 11, 2018, the Federal Election Commission notified you, Patriotic Warriors, LLC, and Citizens for Trump of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended (“the Act”). A copy of the complaint was forwarded to you at that time.

On July 11, 2019, the Commission voted to find reason to believe that Citizens for Trump violated 52 U.S.C. §§ 30102, 30103, and 30104 by failing to register and report as a political committee. Further, the Commission dismissed the allegations you, Patriotic Warriors, LLC, and Citizens for Trump 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. The Factual and Legal Analysis for Citizens for Trump was provided to you at that time. The Factual and Legal Analyses for you and Patriotic Warriors, LLC, which more fully explains the Commission’s decision, are enclosed for your information.

After an investigation, on April 28, 2022, the Commission voted to take no further action against Citizens for Trump. Accordingly, the Commission closed the file as to all respondents in this matter.

Documents related to the case will be placed on the public record within 30 days. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016). If you have any questions, please contact Nicholas Bamman, the attorney assigned to this matter, at (202) 694-1650 or [nbamman@fec.gov](mailto:nbamman@fec.gov).

Sincerely,

A handwritten signature in cursive script that reads "Theodore Lutz".

Theodore Lutz  
Assistant General Counsel

Enclosure  
Factual and Legal Analyses

1 **FEDERAL ELECTION COMMISSION**

2 **FACTUAL AND LEGAL ANALYSIS**

3 RESPONDENT: Patriotic Warriors LLC MUR: 7401

4  
5 **I. FACTUAL BACKGROUND**

6 The Complaint generally alleges that various individuals and organizations coordinated  
7 communications with Donald J. Trump and his principal campaign committee, Donald J. Trump  
8 for President, Inc. and Bradley T. Crate in his official capacity as treasurer (“Trump  
9 Committee”). Based on alleged meetings between various individuals and organizations, the  
10 substance of which is vague and unsubstantiated by the Complaint’s attachments, the Complaint  
11 concludes that various individuals and organizations coordinated communications with the  
12 Trump Committee.<sup>1</sup>

13 **II. LEGAL ANALYSIS**

14 The Act prohibits corporations from making, and candidates or their committees from  
15 knowingly accepting, contributions in connection with any election to political office.<sup>2</sup>  
16 Expenditures made by any person “in cooperation, consultation, or concert with, or at the request  
17 or suggestion of” a candidate or his authorized committee or agent qualify as an in-kind  
18 contribution to the candidate and must be reported as expenditures made by the candidate’s  
19 authorized committee.<sup>3</sup>

20 A communication that is coordinated with a candidate or his authorized committee is  
21 considered an in-kind contribution and is subject to the limits, prohibitions, and reporting

---

<sup>1</sup> See Compl. at 1, 3.

<sup>2</sup> 52 U.S.C. § 30118(a).

<sup>3</sup> 52 U.S.C. § 30116(a)(7)(B); 11 C.F.R. § 109.20(a), (b).

1 requirements of the Act.<sup>4</sup> A communication is coordinated with a candidate, his authorized  
2 committee, or agent of either, if it meets a three-prong test set forth in the Commission's  
3 regulations: (1) it is paid for, in whole or in part, by a person other than the candidate or  
4 authorized committee; (2) it satisfies a content standard in 11 C.F.R. § 109.21(c); and (3) it  
5 satisfies a conduct standard in 11 C.F.R. § 109.21(d). All three prongs must be satisfied for a  
6 communication to be considered coordinated under Commission regulations.<sup>5</sup>

7       Here, the Complaint does not identify any specific communications with which to  
8 conduct a coordination analysis. Nor do the conclusory allegations of meetings between various  
9 individuals and organizations, indicate, based on the available information in the record, any  
10 impermissible coordination under the Act or Commission regulations. Because the allegations  
11 fail to indicate that a violation occurred, the Commission dismisses the allegations that various  
12 individuals and organizations made, and the Trump Committee accepted, prohibited  
13 contributions in the form of coordinated communications or expenditures in violation of  
14 52 U.S.C. §§ 30116 and 30118 and 11 C.F.R. § 109.21.

---

<sup>4</sup> 52 U.S.C. § 30116; 11 C.F.R. § 109.21(b).

<sup>5</sup> 11 C.F.R. § 109.21(a); *see also* Explanation and Justification, *Coordinated and Independent Expenditures*, 68 Fed. Reg. 421, 453 (Jan. 3, 2003).

1 **FEDERAL ELECTION COMMISSION**

2 **FACTUAL AND LEGAL ANALYSIS**

3 RESPONDENT: Timothy Selaty, Sr.

MUR: 7401

4  
5 **I. FACTUAL BACKGROUND**

6 The Complaint generally alleges that various individuals and organizations coordinated  
7 communications with Donald J. Trump and his principal campaign committee, Donald J. Trump  
8 for President, Inc. and Bradley T. Crate in his official capacity as treasurer (“Trump  
9 Committee”). Based on alleged meetings between various individuals and organizations, the  
10 substance of which is vague and unsubstantiated by the Complaint’s attachments, the Complaint  
11 concludes that various individuals and organizations coordinated communications with the  
12 Trump Committee.<sup>1</sup>

13 **II. LEGAL ANALYSIS**

14 The Act prohibits corporations from making, and candidates or their committees from  
15 knowingly accepting, contributions in connection with any election to political office.<sup>2</sup>  
16 Expenditures made by any person “in cooperation, consultation, or concert with, or at the request  
17 or suggestion of” a candidate or his authorized committee or agent qualify as an in-kind  
18 contribution to the candidate and must be reported as expenditures made by the candidate’s  
19 authorized committee.<sup>3</sup>

20 A communication that is coordinated with a candidate or his authorized committee is  
21 considered an in-kind contribution and is subject to the limits, prohibitions, and reporting

---

<sup>1</sup> See Compl. at 1, 3.

<sup>2</sup> 52 U.S.C. § 30118(a).

<sup>3</sup> 52 U.S.C. § 30116(a)(7)(B); 11 C.F.R. § 109.20(a), (b).

1 requirements of the Act.<sup>4</sup> A communication is coordinated with a candidate, his authorized  
2 committee, or agent of either, if it meets a three-prong test set forth in the Commission's  
3 regulations: (1) it is paid for, in whole or in part, by a person other than the candidate or  
4 authorized committee; (2) it satisfies a content standard in 11 C.F.R. § 109.21(c); and (3) it  
5 satisfies a conduct standard in 11 C.F.R. § 109.21(d). All three prongs must be satisfied for a  
6 communication to be considered coordinated under Commission regulations.<sup>5</sup>

7       Here, the Complaint does not identify any specific communications with which to  
8 conduct a coordination analysis. Nor do the conclusory allegations of meetings between various  
9 individuals and organizations, indicate, based on the available information in the record, any  
10 impermissible coordination under the Act or Commission regulations. Because the allegations  
11 fail to indicate that a violation occurred, the Commission dismisses the allegations that various  
12 individuals and organizations made, and the Trump Committee accepted, prohibited  
13 contributions in the form of coordinated communications or expenditures in violation of  
14 52 U.S.C. §§ 30116 and 30118 and 11 C.F.R. § 109.21.

---

<sup>4</sup> 52 U.S.C. § 30116; 11 C.F.R. § 109.21(b).

<sup>5</sup> 11 C.F.R. § 109.21(a); *see also* Explanation and Justification, *Coordinated and Independent Expenditures*, 68 Fed. Reg. 421, 453 (Jan. 3, 2003).