

## BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 7442  
 Global Energy Producers, LLC; Igor )  
 Fruman; Lev Parnas; America First )  
 Action, Inc. and Jon Proch in his official )  
 capacity as treasurer; Aaron Investments )  
 I, LLC; The Jacobs Law Group; Russell )  
 S. Jacobs; Unknown Respondents )

CERTIFICATION

I, Vicktoria J. Allen, recording secretary of the Federal Election Commission executive session, do hereby certify that on May 24, 2022, the Commission took the following actions in the above-captioned matter:

1. Failed by a vote of 2-4 to:
  - a. Find reason to believe that Global Energy Producers, LLC, Igor Fruman, and Lev Parnas knowingly and willfully violated 52 U.S.C. § 30122 by making the AFA and Protect the House contributions in the name of another or knowingly permitting their names to be used to effect such a contribution.
  - b. Take no action at this time as to the allegations that Unknown Respondents, the Jacobs Law Group, Russell S. Jacobs, and Aaron LLC violated 52 U.S.C. § 30122 by making contributions in the name of another.
  - c. Take no action at this time that America First Action, Inc. and Jon Proch in his official capacity as treasurer violated 52 U.S.C. § 30122 by knowingly accepting a contribution in the name of another.
  - d. Take no action at this time that American First Action, Inc. and Jon Proch in his official capacity as treasurer violated 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(a) by filing inaccurate disclosure reports.

- e. Take no action at this time that Global Energy Producers, LLC violated 52 U.S.C. §§ 30102, 30103, and 30104 by failing to register and report as a political committee.
- f. Authorize OGC to name and notify Igor Fruman, Steven Fruman, GEP, and FD Import as respondents for potential knowing and willful violations of 52 U.S.C. §§ 30118 and 30122 for contributions charged to FD Import's American Express credit card between February and May 2018.
- g. Authorize OGC to name and notify Parnas, Igor Fruman, Steven Fruman, David Correia, Andrey Kukushkin, Andrey Muraviev, FD Import, and GEP as respondents for potential knowing and willful violations of 52 U.S.C. §§ 30121 and 30122 and 11 C.F.R. § 110.20 in connection with the transfers of funds from Muraviev to FD Import to make contributions in the names of Parnas, Fruman, and GEP.
- h. Approve the Factual and Legal Analyses, as recommended in the First General Counsel's Report dated May 4, 2022.
- i. Approve compulsory process.
- j. Approve the appropriate letters.

Commissioners Broussard and Weintraub voted affirmatively for the motion.

Commissioners Cooksey, Dickerson, Trainor, and Walther dissented.

2. Failed by a vote of 3-3 to:
  - a. Dismiss the allegations pursuant to *Heckler v. Chaney*.
  - b. Close the file.
  - c. Issue the appropriate letters.

Commissioners Cooksey, Dickerson, and Trainor voted affirmatively for the motion.

Commissioners Broussard, Walther, and Weintraub dissented.

3. Decided by a vote of 6-0 to:
  - a. Close the file.
  - b. Issue appropriate letters

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Commissioners Broussard, Cooksey, Dickerson, Trainor, Walther, and Weintraub voted affirmatively for the decision.

Attest:



May 27, 2022

Date

**Vicktoria J Allen**

Digitally signed by Vicktoria J  
Allen  
Date: 2022.05.27 10:27:46 -04'00'

Vicktoria J. Allen  
Acting Deputy Secretary of the  
Commission