




FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463


MEMORANDUM


TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Charles Kitcher
Acting Associate General Counsel for Enforcement

BY: Stephen Gura 
Deputy Associate General Counsel

Jin Lee 
Acting Assistant General Counsel

Justine A. di Giovanni 
Attorney

SUBJECT: MUR 7468 (Progressive Priorities PAC)

RE: Circulation of Discovery Document

As part of the investigation in the above-referenced matter, we are circulating the attached subpoenas directed to Matthew Tunstall and Kyle Davies for the Commission's approval on a 48-hour no-objection basis. On August 7, 2018, the Commission found reason to believe that Progressive Priorities PAC ("PPP") failed to properly itemize any of its contributions and expenditures on any of its filings with the Commission and listed sham treasurers on each of those filings.¹

Over the course of multiple conversations with Tunstall, he made numerous statements regarding its treasurers and PPP's operation that conflict with those made by other third-party witnesses, including Michelle Pautin and Henok Tedla, two of the alleged sham treasurers, and Josiah Cammer, an individual the PAC paid \$500. We therefore seek to depose Tunstall and obtain relevant documents regarding the the PAC's operations, its financial practices, and the identity of the PAC's true treasurer.

¹ Cert., MUR 7468 (Progressive Priorities PAC) (Aug. 9, 2018).

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In addition, we have learned that Davies is Tunstall's cousin and has made untrue statements regarding how much he was paid by PPP. We therefore seek to depose Davies and obtain documents regarding his role in the operation of PPP.

Accordingly, we ask that the Commission approve the attached Subpoenas to Matthew Tunstall and Kyle Davies.