BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

American Ethane Co., LLC; John Houghtaling; Konstantin Nikolaev; Conservative Louisiana and Charles R. Spies in his official capacity as treasurer; Mike Johnson for Louisiana and William Vanderbrook in his official capacity as treasurer; Bold Strategies, LLC and Kyle Ruckert

CERTIFICATION

I, Laura E. Sinram, recording secretary for the Federal Election Commission executive session on July 23, 2019, do hereby certify that the Commission decided by a vote of 4-0 to:

1. Find reason to believe that American Ethane Co., LLC and John Houghtaling violated 52 U.S.C. § 30121(a)(1)(A) by making prohibited foreign national contributions; or in the alternative, find reason to believe that American Ethane Co., LLC and John Houghtaling violated 52 U.S.C. § 30118(a) by making prohibited corporate contributions.

2. Take no action at this time as to the allegation that American Ethane Co., LLC and John Houghtaling 52 U.S.C. § 30122 by making contributions in the name of another.

3. Take no action at this time as to Conservative Louisiana and Charles R. Spies in his official capacity as treasurer, Mike Johnson for Louisiana and William Vanderbrook in his official capacity as treasurer, Konstantin Nikolaev; Bold Strategies, LLC, and Kyle Ruckert.

4. Approve the Factual and Legal Analysis, as recommended in the First General Counsel's Report dated June 13, 2019 and last circulated by Vice Chairman Petersen's Office on July 21, 2019; and
Federal Election Commission  
Certification for MUR 7491  
July 23, 2019

a. Further instruct the Office of General Counsel to include a footnote in that Factual and Legal Analysis putting the respondent on notice about the possibility of an investigation unearthing further information related to a giving in the name of another scheme in violation of 52 U.S.C. § 30122.

5. Approve the use of compulsory process.

6. **Approve the appropriate letters.**

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

Attest:

Laura E. Sinram  
Acting Secretary and Clerk of the Commission