

## BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MURs 7427, 7497, 7524 and 7553
National Rifle Association of America	)	
Political Victory Fund and Robert	)	
Owens, in his official capacity as	)	
treasurer; National Rifle Association of	)	
America Institute for Legislative Action	)	
and Robert Owens, in his official	)	
capacity as treasurer; OnMessage, Inc.;	)	
Starboard Strategic, Inc.; Thom Tillis	)	
Committee and Collin McMichael in his	)	
official capacity as treasurer; Cotton for	)	
Senate and Theodore V. Koch in his	)	
official capacity as treasurer; Cory	)	
Gardner for Senate and Lisa Lisker in	)	
her official capacity as treasurer; Ron	)	
Johnson for Senate, Inc. and James J.	)	
Malczewski in his official capacity as	)	
treasurer; Matt Rosendale for Montana	)	
and Errol Galt in his official capacity as	)	
treasurer; Josh Hawley for Senate and	)	
Salvatore Purpura in his official	)	
capacity as treasurer; National Media	)	
Research and Placement, LLC; Red	)	
Eagle Media Group; American Media &	)	
Advocacy Group, LLC; Donald J.	)	
Trump for President, Inc. and Bradley	)	
T. Crate in his official capacity as	)	
treasurer	)	

CERTIFICATION

I, Vicktoria J. Allen, recording secretary for the Federal Election Commission executive session on February 23, 2021, do hereby certify that the Commission failed by a vote of 3-2 to take the following actions in MURs 7427, 7497, 7524, and 7553:

**MUR 7553**

1. Find reason to believe that the National Rifle Association of America Political Victory Fund and the Nation Rifle Association of America Institute for Legislative Action violated 52 U.S.C. §§ 30104(b), 30116(a) and 30118(a) by making and failing to report excessive and prohibited in-kind contributions to Donald J. Trump for President, Inc. and Bradley T. Crate in his official capacity as treasurer by coordinating communications through National Media.
2. Find reason to believe that Donald J. Trump for President, Inc. and Bradley T. Crate in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b), 30116(f), and 30118(a) and direct the Office of General Counsel to draft a corresponding Factual and Legal Analysis and appropriate letter.
3. Approve the Factual and Legal Analysis, as recommended in the First General Counsel's Report dated May 10, 2019, subject to the edits circulated by Commissioner Weintraub's Office on Monday, January 25, 2021 at 6:11 P.M.
4. Authorize the use of compulsory process, including the issuance of appropriate interrogatories, document subpoenas, and deposition subpoenas, as necessary.
5. Approve the appropriate letter.

**MUR 7524**

1. Find reason to believe that the National Rifle Association of America Political Victory Fund violated 52 U.S.C. §§ 30104(b), 30116(a), and 30118(a) by making and failing to report excessive and prohibited in-kind contributions to Josh Hawley for Senate and Salvatore Purpura in his official capacity as treasurer by coordinating communications through National Media.
2. Find reason to believe that Josh Hawley for Senate and Salvatore Purpura in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b), 30116(f), and 30118(a) and direct the Office of General Counsel to draft a corresponding Factual and Legal Analysis and appropriate letter.
3. Find reason to believe that the National Rifle Association of America Political Victory Fund and the National Rifle Association of America Institute of Legislative Action coordinated communications with the Thom Tillis Committee and Collin McMichael in his official capacity as

treasurer, Cotton for Senate and Theodore V. Koch in his official capacity as treasurer, Cory Gardner for Senate and Lisa Lisker in her official capacity as treasurer, Ron Johnson for Senate, Inc. and James J. Malczewski in his official capacity as treasurer, and Josh Hawley for Senate and Salvatore Purpura in his official capacity as treasurer through OnMessage and Starboard; and direct the Office of General Counsel to draft a corresponding Factual and Legal Analysis and appropriate letter.

4. Find reason to believe that the Thom Tillis Committee and Collin McMichael in his official capacity as treasurer, Cotton for Senate and Theodore V. Koch in his official capacity as treasurer, Cory Gardner for Senate and Lisa Lisker in her official capacity as treasurer, Ron Johnson for Senate, Inc. and James J. Malczewski in his official capacity as treasurer, and Josh Hawley for Senate and Salvatore Purpura in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b), 30116(f), and 30118(a) (through OnMessage and Starboard); and direct the Office of General Counsel to draft a corresponding Factual and Legal Analysis and appropriate letter.
5. Approve the Factual and Legal Analysis, as recommended in the First General Counsel's Report dated May 10, 2019, subject to the edits circulated by Commissioner Weintraub's Office on Monday, January 25, 2021 at 6:11 P.M.
6. Authorize the use of compulsory process, including the issuance of appropriate interrogatories, document subpoenas, and deposition subpoenas, as necessary.
7. Approve the appropriate letter.

#### **MUR 7497**

1. Find reason to believe that the National Rifle Association of America Institute for Legislative Action and Robert G. Owens in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b), 30116(a), and 30118(a).
2. Find reason to believe that the Thom Tillis Committee and Collin McMichael in his official capacity as treasurer, Cotton for Senate and Theodore V. Koch in his official capacity as treasurer, Cory Gardner for Senate and Lisa Lisker in her official capacity as treasurer, and Ron Johnson for Senate, Inc. and James J. Malczewski in his official capacity as treasurer and Matt Rosendale for Montana and Errol Galt in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b), 30116(f), and 30118(a).

3. Direct the Office of General Counsel to draft appropriate Factual and Legal Analyses and appropriate letters.
4. Approve compulsory process.

**MUR 7427**

1. Find reason to believe that the National Rifle Association of America Political Victory Fund and Robert G. Owens in his official capacity as treasurer and the National Rifle Association of America Institute for Legislative Action and Robert G. Owens in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b), 30116(a), and 30118(a).
2. Find reason to believe that the Thom Tillis Committee and Collin McMichael in his official capacity as treasurer, Cotton for Senate and Theodore V. Koch in his official capacity as treasurer, Cory Gardner for Senate and Lisa Lisker in her official capacity as treasurer, and Ron Johnson for Senate, Inc. and James J. Malczewski in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b), 30116(f), and 30118(a).
3. Direct the Office of General Counsel to draft appropriate Factual and Legal Analyses and appropriate letters.
4. Approve compulsory process.

Commissioners Broussard, Walther, and Weintraub voted affirmatively for the motion.

Commissioners Dickerson and Trainor dissented. Commissioner Cooksey was recused and did not vote.

Attest:



**Vicktoria Allen**

Digitally signed by Vicktoria Allen  
Date: 2021.04.12 17:40:01 -04'00'

---

Vicktoria J. Allen  
Acting Deputy Secretary of the Commission