

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURs 7654 and 7660
 America First Action, Inc. and Jon)
 Proch in his official capacity as)
 treasurer; OnMessage, Inc.; Starboard)
 Strategic, Inc.; Josh Hawley for Senate)
 and Salvatore Purpura in his official)
 capacity as treasurer; Matt Rosendale)
 for Montana and Errol Galt in his)
 official capacity as treasurer; Pete)
 Sessions for Congress and Steve)
 Hargrove in his official capacity as)
 treasurer; National Media Research,)
 Planning and Placement, LLC; National)
 Rifle Association of America Political)
 Victory 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; Corey Gardner for Senate and)
 Lisa Lisker in her official capacity as)
 treasurer; Corey Gardner)

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 7654 and 7660:

1. Merge MUR 7660 into MUR 7427.
2. Find reason to believe that America First Action, Inc. and Jon Proch, in his official capacity as treasurer 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 and Purpura in his official capacity as treasurer by coordinating communications through National Media.
3. Find reason to believe that America First Action, Inc. and Jon Proch, in his official capacity as treasurer 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 Matt Rosendale for Montana and Errol Galt in his official capacity as treasurer by coordinating communications through National Media.
 4. Find reason to believe that America First Action, Inc. and Jon Proch, in his official capacity as treasurer 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 Pete Sessions for Congress and Steve Hargrove in his official capacity as treasurer by coordinating communications through National Media.
 5. Find reason to believe that Hawley for Senate and Salvatore Purpura in his official capacity as treasurer, Rosendale for Montana and Errol Galt in his official capacity as treasurer, Pete Sessions for Congress and Steve Hargrove in his official capacity as treasurer violated 52 U.S.C. §§ 30104(b), 30116(f), and 30118(a).
 6. Direct the Office of General Counsel to draft corresponding Factual and Legal Analyses and send the appropriate letters.
 7. Approve the Factual and Legal Analysis, as recommended in the First General Counsel's Report dated August 7, 2020, subject to the edits circulated by Commissioner Weintraub's Office on January 25, 2021 at 5:57 p.m.
 8. Authorize the use of compulsory process, including the issuance of appropriate interrogatories, document subpoenas, and deposition subpoenas, as necessary.
 9. Approve the appropriate letter.

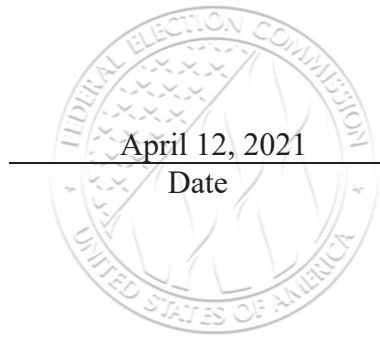
Commissioners Broussard, Walther, and Weintraub voted affirmatively for the motion.

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

Federal Election Commission
Certification for MURs 7554 and 7660
February 23, 2021

Page 3

Attest:



Vicktoria Allen Digitally signed by Vicktoria Allen
Date: 2021.04.12 15:18:40 -04'00'

Vicktoria J. Allen
Acting Deputy Secretary of the Commission