

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 7717
 Theresa Greenfield for Iowa and Theresa)
 L. Kehoe in her official capacity as)
 treasurer; Theresa Greenfield; SMP and)
 Rebecca Lambe in her official capacity)
 as treasurer)

CERTIFICATION

I, Viktoria J. Allen, recording secretary of the Federal Election Commission executive session, do hereby certify that on March 08, 2022, the Commission took the following actions in the above-captioned matter:

1. Failed by a vote of 3-3 to:
 - a. Find reason to believe that SMP and Rebecca Lambe in her official capacity as treasurer violated 52 U.S.C. §§ 30116(a)(1)(A) and 30118 (a) and 11 C.F.R. § 110.1(b)(1) by making excessive and prohibited in-kind contributions to Theresa Greenfield for Iowa and 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(b) by failing to report the in-kind contributions.
 - b. Direct the Office of General Counsel to draft an appropriate Factual and Legal Analysis
 - c.
 - d. Approve the appropriate letters.

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

Commissioners Cooksey, Dickerson, and Trainor dissented.

2. Failed by a vote of 2-4 to:

- a. Dismiss the allegations that SMP and Rebecca Lambe in her official capacity as treasurer violated 52 U.S.C. § 30116(a)(1)(A) and 11 C.F.R. § 110.1(b)(1) and 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(b) pursuant to the Commission's prosecutorial discretion under *Heckler v. Chaney*.
- b. Find no reason to believe that Theresa Greenfield and Theresa Greenfield for Iowa and Theresa L. Kehoe in her official capacity as treasurer violated 52 U.S.C § 30116(f) and 11 C.F.R. § 110.9 and 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(a).
- c. Close the file as to all respondents.
- d. Approve the appropriate letters.

Commissioners Dickerson and Trainor voted affirmatively for the motion.

Commissioners Broussard, Cooksey, Walther, and Weintraub dissented.

3. Failed by a vote of 2-4 to:

- a. Find no reason to believe that SMP and Rebecca Lambe in her official capacity as treasurer violated 52 U.S.C. § 30116(a)(1)(A) and 11 C.F.R. § 110.1(b)(1) and 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(b).
- b. Find no reason to believe that Theresa Greenfield and Theresa Greenfield for Iowa and Theresa L. Kehoe in her official capacity as treasurer violated 52 U.S.C § 30116(f) and 11 C.F.R. § 110.9 and 52 U.S.C. § 30104(b) and 11 C.F.R. § 104.3(a).
- c. Close the file.
- d. Issue appropriate letters.

Commissioners Cooksey and Trainor voted affirmatively for the motion. Commissioners

Broussard, Dickerson, Walther, and Weintraub dissented.

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

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

Attest:



Vicktoria J Allen Digitally signed by Vicktoria J Allen
Date: 2022.03.14 16:13:30 -04'00'

Vicktoria J. Allen
Acting Deputy Secretary of the
Commission