



FEDERAL ELECTION COMMISSION  
 1150 FIRST STREET, N.E.  
 WASHINGTON, D.C. 20463

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 ) MUR 7807  
 Snap, Inc., *et al.* )  
 )

**SUPPLEMENTAL STATEMENT OF REASONS OF  
 VICE CHAIR ALLEN DICKERSON  
 AND COMMISSIONER JAMES E. "TREY" TRAINOR, III**

These Matters presented similar questions to those in Matters Under Review ("MUR") 7821, 7827, and 7868 (Twitter, Inc., *et al.*). We joined in full our Office of General Counsel's legal conclusions to recommend against enforcement. However, for substantially similar reasons to those we articulated in regard to MURs 7821, 7827, and 7868, we believe that Respondents' alleged conduct is also shielded by both the Federal Election Campaign Act's media exemption and the Press Clause of the First Amendment to the federal Constitution.<sup>1</sup>

Allen Dickerson  
 Vice Chair

October 13, 2021

Date

James E. "Trey" Trainor, III  
 Commissioner

October 13, 2021

Date

<sup>1</sup> See Supp. Statement of Reasons of Vice Chair Dickerson and Comm'r Trainor, MURs 7821/7827/7868, Sept. 13, 2021.