



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

April 28, 2025

BY EMAIL

E. Stewart Crosland
Jones Day
51 Louisiana Avenue, NW
Washington, DC 20001
scrosland@jonesday.com

RE: MUR 7994

Dear Mr. Crosland:

On May 6, 2022, the Federal Election Commission notified your clients, ML Organization, LLC, and William Pulte, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). On February 27, 2024, the Commission, on the basis of the information in the complaint, and information provided by your clients, voted to find no reason to believe that ML Organization, LLC, and William Pulte violated 52 U.S.C. § 30122. Accordingly, on March 26, 2025, the Commission voted to close its file in this matter effective April 28, 2025.

Documents related to the case will be placed on the public record today. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016). Any applicable Factual and Legal Analysis or Statements of Reasons available at the time of this letter's transmittal are enclosed.

If you have any questions, please contact Jacob Tully, the attorney assigned to this matter, at (202) 694-1404.

Sincerely,

Mark Shonkwiler

Mark D. Shonkwiler
Assistant General Counsel

**FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS**

Respondent: Make America Great Again, Again! Inc. and Charles MUR 7994
Gantt in his official capacity as treasurer

I. INTRODUCTION

The Complaint in this matter alleges that Make America Great Again, Again! Inc. and Charles Gantt in his official capacity as treasurer (“MAGA Again!” or the “Committee”) knowingly accepted a contribution made in the name of another from William Pulte when ML Organization, LLC (“ML Organization”), a limited liability corporation (“LLC”), was reported to have contributed \$500,000 to MAGA Again! on November 1, 2021. The Complaint also alleges that MAGA Again! failed to report required information regarding the attribution of this \$500,000 LLC contribution. After receiving the Complaint, MAGA Again! amended its disclosure reports to attribute the entire amount of ML Organization’s contribution to member Diana Pulte, which was consistent with contributor form information that MAGA Again! had previously received with the contribution.

Regarding the allegation that MAGA Again! accepted a contribution made in the name of another, there is no information in the record indicating that ML Organization received funds for the purpose of making a contribution on behalf of another. Accordingly, the Commission finds no reason to believe that MAGA Again! violated 52 U.S.C. § 30122 by knowingly accepting a contribution in the name of another.

Regarding the allegation that MAGA Again! did not properly report the contribution, the information provided in the Response establishes that ML Organization is a multimember LLC that does not elect to be taxed as a corporation and, therefore, its contribution should have been attributed pursuant to 11 C.F.R. § 110.1(g)(2) — which requires that such contributions be attributed to the LLC’s members either in proportion to their share of the LLC’s profits or by

1 other agreement of the members, subject to additional limitations. MAGA Again!, however,
2 reported the contribution as if ML Organization were a corporate LLC. MAGA Again! received
3 an attribution form indicating that the contribution was an LLC contribution, but the information
4 provided on that form did not explicitly identify the LLC's tax status. That form, however, listed
5 the "contributor" as Diana Pulte, one of the members of the LLC and its then-vice president.

6 Under these circumstances, the Committee failed to accurately report attribution
7 information. Further, it does not appear that the Committee made best efforts to attempt to
8 clarify the information it received or otherwise obtain attribution information. The Commission
9 therefore finds reason to believe that MAGA Again! violated 52 U.S.C. § 30104(b) and
10 11 C.F.R. § 110.1(e).

11 **II. FACTUAL BACKGROUND**

12 Make America Great Again, Again! is an independent expenditure-only political
13 committee ("IEOPC") that first registered with the Commission on October 1, 2021.¹ Its
14 treasurer is Charles Gantt.² In its original 2021 Year-End Report, MAGA Again! reported a
15 \$500,000 contribution which it received on November 1, 2021, from ML Organization, LLC, a
16 multimember LLC managing investments on behalf of the Pulte family.³ MAGA Again!
17 provided no attribution information associated with this contribution at the time.⁴ After
18 receiving the Complaint in this matter, MAGA Again! amended its 2021 Year-End Report to add

¹ MAGA Again!, Statement of Organization (Oct. 1, 2021).

² MAGA Again!, Amended Statement of Organization (May 12, 2022).

³ MAGA Again!, 2021 Year-End Report at 13 (Jan. 31, 2022), <https://docquery.fec.gov/pdf/926/202201319485556926/202201319485556926.pdf>.

⁴ *Id.*

1 attribution information, attributing the full \$500,000 contribution to Diana Pulte, a member of
2 ML Organization.⁵

3 The Complaint alleges that ML Organization was not the true contributor of the \$500,000
4 contribution.⁶ It bases this allegation on ML Organization’s lack of publicly identifiable
5 activities or income since its registration as a Delaware domestic LLC in April 2018 and the fact
6 that William Pulte is the owner of the address — which appears to be a single-family home —
7 listed for ML Organization in MAGA Again!’s disclosures.⁷

8 In its Response, MAGA Again! contends that it exercised appropriate diligence in
9 determining the source of the contribution because the donor form it received indicated that the
10 contribution was from an LLC, and the contributor did not indicate that the LLC was taxed as a
11 partnership.⁸ It also contends that it took “prompt remedial action” by amending its report after
12 receiving notice of the Complaint in this matter.⁹ It further contends that there should be no civil
13 penalty in this matter if the Commission finds reason to believe that a violation occurred,
14 because it had not received adequate notice as to the requirements for attributing LLC
15 contributions.¹⁰

⁵ MAGA Again!, Amended 2021 Year-End Report at 13, 14 (May 20, 2022), <https://docquery.fec.gov/pdf/095/202205209512531095/202205209512531095.pdf>.

⁶ Compl. ¶ 1 (May 2, 2022).

⁷ *Id.* ¶¶ 3-4, 10-11, 14-15, 26-29.

⁸ MAGA Again! Resp. at 2-4 (June 17, 2022).

⁹ *Id.* at 4. It also represents that it amended its donor form before receiving the Complaint, and it attached the new form, which provides a clear space to list donor attribution information. *Id.*, Ex. C.

¹⁰ MAGA Again! Resp. at 5. The Response also contends that MAGA Again! should not have been added as a respondent because it is not named as a respondent in the Complaint. *Id.* at 2.

The Response also includes a copy of the donor form that Diana Pulte completed in connection with the \$500,000 contribution, the relevant portion of which is provided below:¹¹

III. LEGAL ANALYSIS

A. Contribution in the Name of Another

The Act provides that a contribution includes “any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.”¹² The term “person” for purposes of the Act and Commission regulations includes partnerships, corporations, and “any other organization or group of persons.”¹³ The Act prohibits a person from making a contribution in the name of another person, knowingly permitting his or her name to be used to effect such a contribution, or

¹¹ *Id.*, Ex. A.

¹² 52 U.S.C. § 30101(8)(A).

¹³ *Id.* § 30101(11); 11 C.F.R. § 100.10.

1 knowingly accepting such a contribution.¹⁴ The Commission's regulations include illustrations
2 of activities that constitute making a contribution in the name of another:

3 (i) Giving money or anything of value, all or part of which
4 was provided to the contributor by another person (the true
5 contributor) without disclosing the source of money or the
6 thing of value to the recipient candidate or committee at the
7 time the contribution is made; or

8 (ii) Making a contribution of money or anything of value and
9 attributing as the source of the money or thing of value
10 another person when in fact the contributor is the source.¹⁵

11 Both the Act and the Commission's implementing regulations provide that a person who
12 furnishes another with funds for the purpose of contributing to a candidate or committee "makes"
13 the resulting contribution.¹⁶

14 Here, the available information does not indicate that ML Organization operated as a
15 conduit for the \$500,000 contribution to MAGA Again!. Rather, it appears that ML
16 Organization was the true contributor. Moreover, there is also no information in the record
17 indicating that William Pulte or Diana Pulte sought to conceal their identities as the owners of
18 ML Organization, nor that Ms. Pulte sought to hide her identity as the true contributor. The
19 contributor form indicates that attribution information regarding Diana Pulte was provided at the
20 time of the contribution.¹⁷

21 The only available information to indicate that the contribution was made in the name of
22 another is the initial lack of attribution information in MAGA Again!'s disclosure report. As

¹⁴ 52 U.S.C. § 30122.

¹⁵ 11 C.F.R. § 110.4(b)(2)(i)-(ii).

¹⁶ See 52 U.S.C § 30122; 11 C.F.R. § 110.4.

¹⁷ *Supra* note 11 and accompanying text (reflecting information regarding Diana Pulte written on donor form).

MAGA Again!, and not the ML Organization or Ms. Pulte, was responsible for the contents of that report, and absent additional information indicating a conduit contribution scheme occurred, the Commission finds no reason to believe that MAGA Again! violated 52 U.S.C. § 30122 by knowingly accepting a contribution in the name of another.

B. Failure to Report Attribution Information

The treasurer of an unauthorized political committee is responsible for reporting the identification of each person whose aggregate contributions exceed \$200 per calendar year, together with the date and amount of any such contribution.¹⁸ Commission regulations require committees to report certain attribution information for contributions from limited liability companies.¹⁹ Commission regulations state that “[a] contribution by an LLC that elects to be treated as a partnership by the Internal Revenue Service pursuant to [26 C.F.R. §] 301.7701-3, or does not elect treatment as either a partnership or a corporation, pursuant to that section, shall be considered a contribution from a partnership pursuant to [11 C.F.R. §] 110.1(e).”²⁰ Thus, contributions by an LLC that does not elect to be treated as a corporation by the Internal Revenue Service and does not have a single natural-person member are treated as partnership contributions, which must be attributed to both the LLC and its member or members.²¹ Furthermore, when an LLC makes a contribution, it must affirm to the recipient, at the time the

¹⁸ 52 U.S.C. § 30104(b)(3)(A); 11 C.F.R. § 104.3(a)(4).

¹⁹ See 11 C.F.R. § 110.1(g).

²⁰ *Id.* § 110.1(g)(2). The regulations further specify that a “contribution by an LLC with a single natural[-]person member that does not elect to be treated as a corporation by the Internal Revenue Service . . . shall be attributed only to that single member.” *Id.* § 110.1(g)(4); see also *id.* § 110.1(g)(3) (governing contributions by LLCs electing IRS treatment as corporations and LLCs with publicly traded shares). The current record does not support a finding that ML Organization is a publicly traded LLC and it does not appear that ML Organization is a single-member LLC. See 11 C.F.R. § 110.1(g)(3), (4).

²¹ *Id.* § 110.1(e), (g). Commission regulations specify that contributions by partnerships are attributed to the partnership and to each partner in direct proportion to his or her share of the partnership profits unless otherwise agreed to by the partners. *Id.* § 110.1(e).

1 LLC makes the contribution, that it is eligible to make a contribution and “provide information to
2 the recipient committee as to how the contribution is to be attributed.”²²

3 Although the Commission’s regulations concerning the attribution of LLC contributions
4 were promulgated prior to developments in the law that led to the creation of IEOPCs (such as
5 the recipient committee in this matter), they apply on their face to all political committees and
6 neither Congress, courts nor the Commission has exempted IEOPCs from their application.²³
7 These regulations uphold the Act’s reporting framework and inhibit attempts to circumvent the
8 Act’s contribution source prohibitions and amount limitations, including prohibitions applicable
9 to IEOPCs.²⁴ The Commission has recognized that recipient committees must seek attribution
10 information so that the recipient committees can accurately disclose those contributions to the
11 public.²⁵

12 When a treasurer of a political committee shows that the committee used “best efforts” to
13 obtain, maintain, and submit the information required by the Act, the committee’s reports will be
14 considered in compliance with the Act.²⁶ Best efforts require, among other things, that all
15 written solicitations contain a clear request for the necessary information and that, “[f]or each

²² *Id.* § 110.1(g)(5).

²³ See Statement of Reasons of Chairman Dickerson, Vice Chair Walther, & Comm’rs Broussard & Weintraub at 2, MUR 7454 (Blue Magnolia, *et al.*); Factual & Legal Analysis (“F&LA”) at 14-15, MUR 7464 (LZP, LLC) (citing 52 U.S.C. §§ 30116(a)(1), 30118(a)); Treatment of Limited Liability Companies Under the Federal Election Campaign Act, 64 Fed. Reg. 37,397, 37,398-99 (July 12, 1999) (“LLC E&J”) (discussing role of LLC attribution rules in identifying prohibited contributions from foreign national or government contractor sources, concerns that apply to all LLC contributions, including contributions to IEOPCs).

²⁴ See 52 U.S.C. §§ 30116(a)(1), 30118(a); LLC E&J, 64 Fed. Reg. at 37,398-99.

²⁵ LLC E&J, 64 Fed. Reg. at 37,399 (“The Commission further notes that the recipient committee would have no way of knowing how to attribute a contribution made by an eligible multi-member or single member LLC, unless that information was provided.”); F&LA at 5, MUR7454 (DefendArizona) (finding that the recipient independent expenditure-only political committee failed to seek attribution information so that it could accurately disclose the contribution, as required under 11 C.F.R. § 110.1(e)).

²⁶ 52 U.S.C. § 30102(i); 11 C.F.R. § 104.7(a).

1 contribution . . . which lacks required contributor information,” the recipient committee must
2 make at least one effort to obtain the missing information within 30 days after the receipt of the
3 contribution, in either a written request or a documented oral request.²⁷ If the treasurer receives
4 missing contributor information after submitting a report, the treasurer either files an amendment
5 to the report originally disclosing the contribution to provide the missing contributor information
6 or includes the missing contributor information on an amended memo Schedule A with the next
7 regularly scheduled report.²⁸ Best efforts require political committees and their treasurers to
8 “show[] that best efforts have been used to obtain, maintain, and submit the information
9 required”²⁹

10 Here, the available information indicates that ML Organization’s contribution should
11 have been attributed to Diana Pulte because ML Organization is not taxed as a corporation and
12 Diana Pulte appears to be the member to whom the contribution should be attributed. After
13 receiving the Complaint in this matter, five months after filing its original 2021 Year-End
14 Report, MAGA Again! amended its report to attribute the contribution to Diana Pulte.³⁰ It did
15 not, however, do so at the outset. MAGA Again! thus failed to report the attribution information
16 required under 52 U.S.C. § 30104(b) and 11 C.F.R. § 110.1(g)(2).

17 The available information also does not establish that MAGA Again! satisfied the
18 requirements of the “best efforts” provisions of the Act and Commission regulations, which may

²⁷ 11 C.F.R. § 104.7(b).

²⁸ *Id.* § 104.7(b)(4)(i).

²⁹ 52 U.S.C. § 30102(i); *see also* Statement of Policy Regarding Treasurers’ Best Efforts to Obtain, Maintain, and Submit Information as Required by the Federal Election Campaign Act, 72 Fed. Reg. 31,438, 31,440 (June 7, 2007).

³⁰ MAGA Again! Resp. at 3-4 (stating that the Committee “took prompt remedial actions” by, *inter alia*, “fil[ing] an amended report with the Commission to correct the public record”).

1 cause an otherwise deficient report to be deemed in compliance with the Act.³¹ Those provisions
2 require, among other things, that when a reporting Committee receives a contribution that lacks
3 required contributor information “the treasurer make[] at least one effort after the receipt of the
4 contribution to obtain the missing information” within 30 days.³² The request “must clearly ask
5 for the missing information, and must include the statement set forth” in 11 C.F.R.
6 § 104.7(b)(1).³³ MAGA Again! does not contend that it made any efforts to obtain attribution
7 information for ML Organization’s contribution except to “provide[] a mechanism for the
8 contributor to attribute their contribution” in the form of the donor card.³⁴ It contends that it did
9 so because a contributor could indicate that an LLC was taxed as a partnership by checking the
10 box marked “partnership” as well as the box marked “LLC” on its donor form.³⁵ But the
11 contributor also did not check the box marked “corporation” to indicate that the LLC was taxed
12 as a corporation, nor did the attribution form include any check boxes clearly indicating whether
13 a given LLC was taxed as a corporation or otherwise. Accordingly, MAGA Again! lacked
14 contributor information, namely, the fact that ML Corporation is an LLC taxed as a partnership,
15 and failed to “clearly ask” for that information “after the receipt of the contribution,” as required
16 by the Commission’s best efforts regulation.³⁶

17 Accordingly, the Commission finds reason to believe that MAGA Again! violated
18 52 U.S.C. § 30104(b) and 11 C.F.R. § 110.1(e) by failing to report attribution information.

³¹ *Supra* note 27 and accompanying text.

³² 11 C.F.R. § 104.7(b)(2).

³³ *Id.*

³⁴ MAGA Again! Resp. at 4.

³⁵ *Id.* at 3-4.

³⁶ 11 C.F.R. § 104.7(b)(2).



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matters of)	
)	
The Freedom Forward Fund, <i>et al.</i>)	MUR 7981
Make America Great Again, Again! Inc., <i>et al.</i>)	MUR 7994
Tread Standard, LLC, <i>et al.</i>)	MUR 8002
Ala. Conservatives Fund, <i>et al.</i>)	MUR 8008
Snow Goose, LLC, <i>et al.</i>)	MUR 8019
Passionforest, LLC, <i>et al.</i>)	MUR 8150

**SUPPLEMENTAL STATEMENT OF REASONS OF COMMISSIONERS
SHANA M. BROUSSARD, ALLEN J. DICKERSON, DARA LINDENBAUM, AND
JAMES E. “TREY” TRAINOR**

On February 27, 2024, the Commission considered several matters with complaints that generally alleged the making of conduit contributions to various committees through limited liability companies (“LLCs”), in violation of the Federal Election Campaign Act’s prohibition on the making of contributions in the name of another.¹ We rejected the premise that the contributions were made in the name of another and instead identified the issue as whether the respondents correctly attributed the contributions made by LLCs. Specifically, we voted to find reason to believe as to some of the LLCs for failing to provide, and as to some of the recipient committees for failing to report, the required attribution information, and directed the Office of

¹ Certification (“Cert.”) (Feb. 27, 2024), MUR 7981 (The Freedom Forward Fund, *et al.*); Cert. (Feb. 27, 2024), MUR 7994 (Make America Great Again, Again!, *et al.*); Amended Cert. (Feb. 27, 2024), MUR 8002 (Tread Standard, LLC, *et al.*); Second Amended Cert. (Feb. 27, 2024), MUR 8008 (Ala. Conservatives Fund, *et al.*); Amended Cert. (Feb. 27, 2024), MUR 8019 (Snow Goose, LLC, *et al.*).

General Counsel to draft appropriate Factual and Legal Analyses and Conciliation Agreements reflecting those findings.²

Additionally, in a September 14, 2024 Statement of Reasons by the four Commissioners that currently comprise the Commission, we outlined our approach to these matters and how we planned to proceed in similar matters going forward.³ On January 14, 2025, the Commission adopted Factual and Legal Analyses and Conciliation Agreements explaining how our approach applied to the facts of these matters.⁴ And finally, at the Commission’s January 30, 2025 Open Meeting, we adopted a sample donor response form as an example of how a recipient committee that receives contributions from LLC may exercise best efforts in collecting and correctly reporting LLC attribution information.⁵

² Cert. ¶¶ 3-4 (Feb. 27, 2024), MUR 7981 (The Freedom Forward Fund, *et al.*) (finding RTB against both the LLC and recipient committee); Cert. ¶ 2 (Feb. 27, 2024), MUR 7994 (Make America Great Again, Again!, *et al.*) (finding RTB against recipient committee); Amended Cert. ¶¶ 2-3 (Feb. 27, 2024), MUR 8002 (Tread Standard, LLC, *et al.*) (finding RTB against both recipient committees and the LLC); Second Amended Cert. ¶¶ 4-6 (Feb. 27, 2024), MUR 8008 (Ala. Conservatives Fund, *et al.*) (finding RTB against the recipient committee but dismissing the LLC); Amended Cert. ¶¶ 2-3 (Feb. 27, 2024), MUR 8019 (Snow Goose, LLC, *et al.*) (dismissing the LLC but finding RTB against the recipient committee). For one of the above-captioned matters, the Commission found reason to believe simultaneous with its adoption of Factual and Legal Analyses and Conciliation Agreement on January 14, 2025. Cert. ¶ 1, MUR 8150 (Passionforest, LLC, *et al.*) (finding RTB against the LLC); *infra* note 4 and accompanying text.

³ Statement of Reasons (“SOR”), Comm’rs Shana M. Broussard, Allen J. Dickerson, Dara Lindenbaum, and James E. “Trey” Trainor, III (Sept. 13, 2024), MURs 7981 (Freedom Forward Fund, *et al.*), 8002 (Tread Standard, LLC, *et al.*), 8008 (Ala. Conservatives Fund, *et al.*), and 8019 (Snow Goose, LLC, *et al.*) (stating that in these and future matters concerning single-member and partnership LLCs, the Commission will proceed against the LLC if it failed to provide correct attribution information; excuse the contributor if the LLC provided correct attribution information within 30 days; dismiss where a recipient committee demonstrates best efforts to obtain attribution information; or pursue a committee that neither exercises best efforts nor accurately reports LLC contributions).

⁴ Cert. ¶¶ 1-2 (Jan. 14, 2025), MUR 7981 (Freedom Forward Fund, *et al.*); Cert. ¶¶ 1-2, MUR 7994 (Make America Great Again, Again!, *et al.*); Cert. ¶¶ 1-2 (Jan. 14, 2025), MUR 8002 (Tread Standard, LLC, *et al.*); Amended Cert. ¶¶ 1-2 (Jan. 14, 2025), MUR 8008 (Ala. Conservatives Fund, *et al.*); Amended Cert. ¶¶ 1-2 (Jan. 14, 2025), MUR 8019 (Snow Goose, LLC, *et al.*); Cert. ¶¶ 1.i, 2, MUR 8150 (Passionforest, LLC, *et al.*).

⁵ Memorandum to the Commission Regarding Sample Donor Response Form for Contributions by LLCs, Agenda Doc.24-53-A (Nov. 21, 2024), <https://www.fec.gov/resources/cms-content/documents/mtgdoc-24-53-A.pdf> (describing the attached sample donor response form to be “used as an example for committees that seek and accept contributions from LLCs,” which “will satisfy the recipient committee’s ‘best efforts’ obligations”).

However, we declined to assess a civil penalty in these matters out of concern that the public lacked sufficient notice regarding this approach and in the interest of fairness by treating matters that the Commission was considering simultaneously in a consistent manner.⁶ With the conclusion of these matters, we no longer consider there to be a risk of insufficient notice or inconsistent treatment. Accordingly, we intend to pursue civil penalties in future matters presented where single-member or partnership LLCs fail to provide attribution information when making contributions, and where those recipient committees fail to exercise best efforts and inaccurately attribute an LLC contribution.

March 12, 2025

Date



Shana M. Broussard
 Commissioner

March 12, 2025

Date



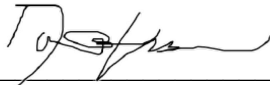
Allen J. Dickerson
 Commissioner

⁶ Cert. ¶ 2 (Jan. 14, 2025), MUR 7981 (Freedom Forward Fund, *et al.*); Cert. ¶ 2, MUR 7994 (Make America Great Again, Again!, *et al.*); Cert. ¶ 2 (Jan. 14, 2025), MUR 8002 (Tread Standard, LLC, *et al.*); Amended Cert. ¶ 2 (Jan. 14, 2025), MUR 8008 (Ala. Conservatives Fund, *et al.*); Amended Cert. ¶ 2 (Jan. 14, 2025), MUR 8019 (Snow Goose LLC, *et al.*); Cert. ¶ 2, MUR 8150 (Passionforest, LLC, *et al.*). Arguably, the regulated community was on sufficient notice that the Commission would pursue civil penalties for these types of violations, at latest, as of April 2022 when the four-Commissioner Statement of Reasons in MUR 7454 (Blue Magnolia Investments, LLC, *et al.*) was released. See SOR at 2-3, Chairman Allen Dickerson, Vice Chair Steven T. Walther, Comm'r Shana M. Broussard, and Comm'r Ellen L. Weintraub (Apr. 15, 2022), MUR 7454 (Blue Magnolia Investments, LLC, *et al.*) (clarifying that "there is no longer a lack of clarity concerning the application of LLC reporting rules and conduit contribution rules in these circumstances" and that "going forward" the Commission would apply its understanding that "contributions from LLCs to committees must be attributed pursuant to Commission regulations, and those regulations apply to all committees, including IEOPCs" and "seek civil penalties in appropriate future cases"). However, these matters almost exclusively involved contributions made prior to April 2022, which informed our concerns about sufficient notice and consistent treatment. Factual & Legal Analysis ("F&LA") at 2, MUR 7981 (Teeter Jay, LLC, *et al.*) (May 2021 contributions); F&LA at 2, MUR 7994 (Make America Great Again, Again! Inc.) (November 2021 contribution); F&LA at 2, MUR 8002 (Tread Standard, LLC) (November 2022 and March 2022 contributions); F&LA at 2, MUR 8008 (Ala. Conservatives Fund) (January 2022 contribution); F&LA at 2, MUR 8019 (Wyoming Values) (February 2022 contribution). But see F&LA at 3, MUR 8150 (Passionforest, LLC) (October 2022 contribution).

MURs 7981, 7994, 8002, 8008, 8019, 8150
Supplemental Statement of Reasons
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March 12, 2025
Date



Dara Lindenbaum
Commissioner

March 12, 2025
Date



James E. "Trey" Trainor, III
Commissioner