

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 8021
 Ohio Ordnance Works, Inc.; Club for)
 Growth Action and Adam Rozansky in)
 his official capacity as treasurer)

CERTIFICATION

I, Vicktoria J. Allen, recording secretary of the Federal Election Commission executive session, do hereby certify that on April 18, 2023, the Commission took the following actions in the above-captioned matter:

1. Failed by a vote of 2-4 to:
 - a. Find reason to believe that Ohio Ordnance Works, Inc. violated 52 U.S.C. § 30119(a)(1) and 11 C.F.R. § 115.2(a) by making a prohibited federal contractor contribution.
 - b. Enter into conciliation with Ohio Ordnance Works, Inc. prior to a finding of probable cause to believe.
 - c. Take no action at this time as to Club for Growth Action and Adam Rozansky in his official capacity as treasurer.
 - d. Approve the Factual and Legal Analysis, as recommended in the First General Counsel's Report dated March 2, 2023.
 - e. Approve the proposed Conciliation Agreement, as recommended in the First General Counsel's Report dated March 2, 2023.
 - f. Approve the appropriate letter.

Commissioners Broussard and Weintraub voted affirmatively for the motion.

Commissioners Cooksey, Dickerson, Lindenbaum, and Trainor dissented.

2. Failed by vote of 3-3 to:

Find no reason to believe that Club for Growth Action and Adam Rozansky in his official capacity as treasurer violated 52 U.S.C. § 30119(a)(2) and 11 C.F.R. § 115.2(c) and direct the Office of General Counsel to draft a conforming Factual and Legal Analysis for Commission approval.

Commissioners Cooksey, Dickerson, and Trainor voted affirmatively for the motion. Commissioners Broussard, Lindenbaum, and Weintraub dissented.

3. Decided by a vote of 6-0 to:

- a. Find reason to believe that Ohio Ordnance Works, Inc. violated 52 U.S.C. § 30119(a)(1) and 11 C.F.R. § 115.2(a) by making a prohibited federal contractor contribution.
- b. Enter into conciliation with Ohio Ordnance Works, Inc. prior to a finding of probable cause to believe.
- c. Approve the Factual and Legal Analysis for Ohio Ordnance Works, Inc., as recommended in the First General Counsel's Report dated March 2, 2023.
- d. Approve the proposed Conciliation Agreement, as recommended in the First General Counsel's Report dated March 2, 2023, subject to the edits circulated by Vice Chairman Cooksey's Office on Friday, April 14, 2023 at 9:35 a.m.
- e. Approve the appropriate letter.

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



Attest:

**Vicktoria J
Allen**

Digitally signed by Vicktoria J
Allen
Date: 2023.04.20 13:36:22
-04'00'

Vicktoria J. Allen
Deputy Secretary of the Commission