



**APPROVED OCTOBER 26, 2022**

**MINUTES OF AN OPEN MEETING  
OF THE  
FEDERAL ELECTION COMMISSION  
THURSDAY, AUGUST 11, 2022<sup>1</sup>**

**PRESENT:**

**Allen Dickerson, Chairman, presiding**

**Dara Lindenbaum, Vice Chair**

**Shana M. Broussard, Commissioner**

**Sean J. Cooksey, Commissioner**

**James E. "Trey" Trainor III, Commissioner**

**Ellen L. Weintraub, Commissioner**

**Alec Palmer, Staff Director**

**Lisa Stevenson, Acting General Counsel<sup>2</sup>**

**Laura E. Sinram, Acting Secretary and Clerk**

**Vicktoria J. Allen, Acting Deputy Secretary<sup>3</sup>**

**Zainab Smith, Program Management Analyst<sup>4</sup>**

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<sup>1</sup> This meeting was conducted as a hybrid meeting with virtual and in-person participants.

<sup>2</sup> Greg Baker, Deputy General Counsel – Administration, represented Acting General Counsel Lisa Stevenson.

<sup>3</sup> Acting Deputy Secretary Vicktoria Allen was the recording secretary for the meeting.

<sup>4</sup> Program Management Analyst Zainab Smith moderated the meeting.

**Chairman Allen Dickerson called the Federal Election Commission to order in an open meeting at 10:05 A.M. on Thursday, August 11, 2022 with a quorum present.**

**\*\*\*\*\***

**Chairman Dickerson recognized Vice Chair Lindenbaum who**

**MOVED to suspend the rules on the timely submission of agenda documents in order that the Commission may consider the late submission of Agenda Documents No. 22-37-B and 22-38-A.**

**The motion carried by a vote of 6-0 with Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voting affirmatively for the decision.**

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**Chairman Dickerson took a moment of personal privilege to welcome Vice Chair Dara Lindenbaum.**

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**I. DRAFT ADVISORY OPINION 2022-12**

**Ready for Ron by Lilian Rodriguez-Baz, Esq.**

**Agenda Document No. 22-36-A (Draft A)**

**Agenda Document No. 22-36-B (Draft B)**

**This matter was held over to a future meeting.**

**II. DRAFT ADVISORY OPINION 2022-13**

**Dr. Alan Gross and Northern Leadership PAC by Lindsay M. Nathan, Esq. and Meredith C. McCoy, Esq.**

**Agenda Document No. 22-35-A (Draft A)**

**Chairman Dickerson recognized Mr. Joseph Wenzinger of the General Counsel's Office and Ms. Lindsay Nathan on behalf of the requestors. Mr. Wenzinger presented the matter.**

**Dr. Alan Gross was a candidate for the U.S. Senate in Alaska in 2020, and a candidate for the U.S. House of Representatives in Alaska in 2022. Northern Leadership PAC is a leadership PAC sponsored by Dr. Gross. The requestors ask whether the committee may convert to an authorized committee of Dr. Gross's campaign for the U.S. House of Representatives, or alternatively, to its previous designation as the principal campaign committee of Dr. Gross's 2020 campaign for the U.S. Senate. The draft concludes that the committee may choose either option.**

**Ms. Nathan participated in the discussion that followed.**

**Chairman Dickerson recognized Vice Chair Lindenbaum who**

**MOVED to approve Agenda Document No. 22-35-A, which is Draft A.**

**The motion carried by a vote of 6-0 with Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voting affirmatively for the decision.**

**III. DRAFT ADVISORY OPINION 2022-14**

**Google LLC by Claire Rajan, Esq.**

**Agenda Document No. 22-37-A (Draft A)**

**Agenda Document No. 22-37-B (Draft B)  
(Submitted Late)**

**Chairman Dickerson recognized Ms. Claire Rajan on behalf of the requestor, and Mr. Wenzinger of the General Counsel's Office. Mr. Wenzinger presented the matter.**

**The requestor asks whether it may offer a pilot program to test new Gmail design features at no cost on a nonpartisan basis to authorized candidate committees, political party committees, and leadership PACs. Draft A concludes that the proposed pilot program would be permissible under the Act and Commission regulations and would not result in the making of prohibited in-kind contributions by a corporation. Draft B concludes that the proposed pilot program would not be permissible under the Act and Commission regulations and would result in the making of prohibited in-kind contributions. The Commission received 2,641 comments on the request and 104 comments on the drafts. Mr. Wenzinger noted that supplementary material from the requestor**

**regarding a technical feature of the proposed pilot program was reflected in Draft B but not in Draft A. Mr. Wenzinger requested that any motion on Draft A include these technical edits.**

**Ms. Rajan participated in the discussion that followed.**

**Chairman Dickerson recognized Commissioner Cooksey who**

**MOVED to approve Agenda Document No. 22-37-A, which is Draft A, subject to the technical and conforming edit to the sentence and associated footnote on page 5, line 15-16 as set out in the requestor's August 10, 2022 Supplemental request submission.**

**Discussion followed regarding whether Commissioner Cooksey would consider withdrawing his motion so that Commissioner Weintraub could make a preliminary motion. Commissioner Cooksey consented and withdrew his motion.**

**Chairman Dickerson recognized Commissioner Weintraub who**

**MOVED to approve Agenda Document No. 22-37-B, which is described as Draft B.**

**The motion failed by a vote of 1-4 with Commissioner Weintraub voting affirmatively for the motion. Commissioners Cooksey, Dickerson, Lindenbaum, and Trainor dissented. Commissioner Broussard abstained.**

**Chairman Dickerson recognized Commissioner Cooksey who**

**MOVED to approve Agenda Document No. 22-37-A, which is Draft A, subject to the technical and conforming edit to the sentence and associated footnote on page 5, line 15-16 as set out in the**

**requestor's August 10, 2022 Supplemental request submission.**

**The motion carried by a vote of 4-1 with Commissioners Cooksey, Dickerson, Lindenbaum, and Trainor voting affirmatively for the decision. Commissioner Weintraub dissented. Commissioner Broussard abstained.**

**IV. DRAFT ADVISORY OPINION 2022-18**

**Bridget Fleming for Congress, Jackie Gordon for Congress, Conole for Congress, and Max Rose for Congress (“House Committees”)**

**Agenda Document No. 22-38-A (Draft A)  
(Submitted Late)**

**Chairman Dickerson recognized Ms. Joanna Waldstreicher of the General Counsel's Office, and Ms. Rachel Jacobs who appeared on behalf of the requestors. Ms. Waldstreicher presented the matter.**

**The requestors are the authorized principal campaign committees of candidates running for nomination in the August 23, 2022 Democratic Primary for the U.S. House of Representatives in New York. New York's Democratic Primary Election was previously scheduled for June 28, 2022, but a series of court decisions culminated in the adoption of new congressional maps, and a primary election was scheduled for August 23, 2022. In light of the Commission's determination in Advisory Opinion 2022-08 (NRCC), that candidates in the August primary election are entitled to a contribution limit separate from the limit for the June primary election, the requestors ask**

**whether they may receive redesignations of general election contributions to the August 23, 2022 primary, even if the redesignations are received more than 60-days after receipt of the contributions. The draft concludes that the requestors may receive redesignations as proposed.**

**Chairman Dickerson recognized Commissioner Cooksey who noted that the matter was an expedited advisory opinion request and thanked the Policy Division for the speed with which it handled the matter.**

**Ms. Jacobs participated in the discussion that followed.**

**Chairman Dickerson recognized Commissioner Broussard who took a moment of personal privilege to recognize counsel for the requestors and former FEC staff, Mr. Jonathan Peterson. Chairman Dickerson echoed those comments.**

**Chairman Dickerson recognized Vice Chair Lindenbaum who**

**MOVED to approve Agenda Document No. 22-38-A,  
which is Draft A.**

**The motion carried by a vote of 6-0 with Commissioners Broussard, Cooksey, Dickerson, Lindenbaum, Trainor, and Weintraub voting affirmatively for the decision.**

**V. MANAGEMENT AND ADMINISTRATIVE MATTERS**

**There being no further business to come before the Commission, the meeting adjourned at 10:57 A.M.**

**Signed:**

A handwritten signature in blue ink, appearing to read "Allen Dickerson", written over a horizontal line.

**Allen Dickerson  
Chairman of the Commission (2022)**

**Attest:**

**Laura E. Sinram  
Secretary and Clerk of the Commission**