



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 ) MUR 6540  
Rick Santorum for President and )  
Nadine Maenza in her )  
official capacity as treasurer, et al. )

**STATEMENT OF REASONS OF  
COMMISSIONER MATTHEW S. PETERSEN**

I concur with the statement of reasons from then-Vice Chairman Donald McGahn and Commissioner Caroline Hunter regarding alleged coordination between Rick Santorum's 2012 presidential campaign and the Michigan Faith and Family Coalition ("MFFC"). The MFFC forum at which Santorum spoke focused on faith-based issues and policies and included several non-candidate speakers, including members of the clergy and the health care community. No evidence was presented indicating that campaign contributions were solicited or accepted at the event or that the event included express advocacy or the dissemination of campaign materials. Thus, the MFFC forum was materially similar to other events the Commission has previously concluded do not constitute in-kind contributions to participating candidates.<sup>1</sup>

As to the allegation that MFFC coordinated with the Santorum campaign on other disbursements, there is insufficient evidence to justify finding reason to believe that these respondents violated the law. As the Office of General Counsel concedes, aside from the forum discussed above (which I concluded was not a campaign event), there is no evidence that MFFC spent any money in connection with the 2012 election. The mere fact that the MFFC president also served as a Santorum campaign volunteer does not, by itself, provide an adequate basis for pursuing the coordination allegation. For these reasons, I voted to close the file in this matter.

  
MATTHEW S. PETERSEN  
Commissioner

FEB. 15, 2017  
Date

<sup>1</sup> See Advisory Opinions 1996-11 (National Right to Life Conventions, Inc.); 1980-22 American Iron and Steel Institute).

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