



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 ) MUR 7897  
Ted Cruz for Senate, *et al.* )  
 )

**STATEMENT OF REASONS OF CHAIR DARA LINDENBAUM, VICE CHAIRMAN  
SEAN J. COOKSEY, AND COMMISSIONERS ALLEN J. DICKERSON AND  
JAMES E. "TREY" TRAINOR, III**

On April 12, 2023, the Commission found reason to believe that Senator Ted Cruz and his campaign committee, Ted Cruz for Senate, converted campaign funds to personal use by purchasing advertisements to promote Cruz's book, *One Vote Away*.<sup>1</sup> Following that vote, the Respondents provided an affidavit from Senator Cruz stating that he directed his publisher to donate all past and future royalties from his book to charity and that neither he nor any member of his family has received any financial benefit from sales of the book or taken any tax deductions from the subsequent charitable donations.<sup>2</sup> In response, the Office of General Counsel recommended that the Commission take no further action with respect to the allegations, and we agreed.<sup>3</sup>

As set out in the Second General Counsel's Report, the developed factual record credibly establishes that the Respondents did not violate 52 U.S.C. § 30114(b) because Cruz did not personally benefit from the book's promotion. Instead, the conduct at issue is analogous to proposals the Commission has deemed permissible in previous advisory opinions.<sup>4</sup>

\_\_\_\_\_  
Dara Lindenbaum  
Chair

August 14, 2023

\_\_\_\_\_  
Date

<sup>1</sup> Certification (April 12, 2023), MUR 7897 (Ted Cruz for Senate, *et al.*).

<sup>2</sup> Reason to Believe Response (May 5, 2023), MUR 7897 (Ted Cruz for Senate, *et al.*).

<sup>3</sup> Second General Counsel's Report (July 17, 2023), MUR 7897 (Ted Cruz for Senate, *et al.*); Certification (August 8, 2023), MUR 7897 (Ted Cruz for Senate, *et al.*).


<sup>4</sup> Second General Counsel's Report at 4–6 (July 17, 2023), MUR 7897 (Ted Cruz for Senate, *et al.*) (citing Advisory Op. 2006-18 (Granger)).

  
\_\_\_\_\_  
Sean J. Cooksey  
Vice Chairman

August 14, 2023  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Allen Dickerson  
Commissioner

August 14, 2023  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
James E. "Trey" Trainor, III  
Commissioner

August 14, 2023  
\_\_\_\_\_  
Date