



Federal Election Commission
Office of General Counsel
999 E Street NW
Washington, DC 20463

RECEIVED

By Office of General Counsel at 5:02 pm, Feb 18, 2021

RECEIVED

By Office of the Commission Secretary at 7:33 am, Feb 19, 2021

To Whom It May Concern:

We write to respectfully request an Advisory Opinion regarding the application of the Federal Election Campaign Act and Commission regulations to prospective activities of Members of Congress who provide content to our website. We would like to ask Members of Congress to provide audio, and in some cases video, content to our platform on the subject of prayer using unofficial or campaign devices. The questions we seek to resolve is whether any of this anticipated activity would constitute “coordinated communications” or a “corporate in-kind contribution” under applicable regulations.

Pray.com is a leading digital destination for faith and a for-profit Delaware C Corporation. It is a free mobile application that gives people the ability to connect directly with faith leaders and explore faith communities. While 60% of the site is free to access for anyone, 40% of the site requires a subscription, but none of the content from the Members would be included in this section of the website.

[Pray.com](https://www.pray.com)'s platform allows anyone to download the app for free and consume free faith-based audio content as well as the option to subscribe to a premium experience if they choose.

The app and web based Freemium product delivers *faith at your fingertips* to millions worldwide, providing a cinematic audio experience across all genres that allows its members to hear the Bible come to life anytime, anywhere.

All elected members of Congress are invited to participate no matter which party they are affiliated with. Introductions to members of Congress will be made through a 3rd party consultant that Pray.com currently has on retainer. Guests of the Pray.com free online streaming broadcast are granted full creative approval of their self-narrated segment. The questions that the Members may answer are:

Record a 5-minute video answering the following questions:

1. Who are you, where are you from, and where do you live today?
2. Give us a quick high-level overview of what you do.
3. What does the power of prayer mean to you and how has it helped in your daily life?
4. Why is faith a requirement for successful leadership?
5. What is your favorite Bible verse and why?
6. What positive message of hope and encouragement can you give to people during these challenging times?

Members can discuss other topics in their message, however, Pray.com will reserve the right to edit the message if the Member deviates from the topic of the script regarding prayer. Members will also have access to their content via a Pray.com webpage hyperlink.

Pray.com currently promotes its product on many different advertising mediums including social media, television, podcasts, and many other platforms. Pray.com may or may not include audio/video clips of the

content from members of Congress in those advertising mediums as a way to showcase the breadth of content offered on the Pray.com platform.

We appreciate your attention to this matter and appreciate your response.

Sincerely,

A handwritten signature in black ink that reads "Michael Lynn". The signature is written in a cursive style with a large, stylized "M" and "L".

Michael Lynn
CFO, Pray.com