



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

April 24, 2025

MEMORANDUM

TO: The Commission

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SUBJECT: Status of Enforcement
Second Quarter 2025 (1/1/2025 to 3/31/2025)

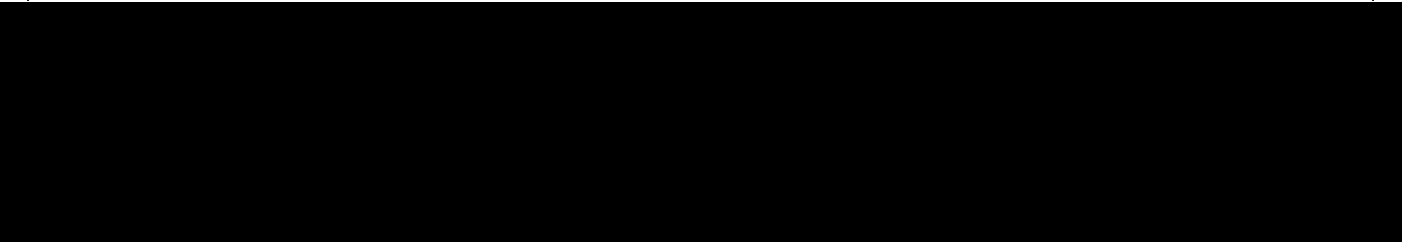
To assist the Commission and the Office of General Counsel in assessing the current productivity of the Commission's enforcement program, we submit the Status of Enforcement for the second quarter (01/1/2025 to 03/31/2025) of 2025. The tables that follow provide information to assist agency management in its review of the enforcement program.

At the close of the quarter, the total enforcement caseload was 161 matters — 123 active¹ and 38 inactive. The Enforcement Division circulated First General Counsel's Reports ("FGCRs") for 32 matters in an average of 148 days, meeting the internal circulation goal 69% of the time. The Enforcement Division's Office of Complaints Examination & Legal Administration ("CELA") circulated EPS reports for 31 matters in an average of 13 days from assignment. No new investigations commenced, and five matters were pending in the investigation stage at the close of the quarter. The Commission closed 62 matters in the quarter in an average of 482 days, thereby meeting its goal of closing matters within 15 months in 71% of these matters. The Commission assessed \$442,000 in civil penalties during the quarter. Finally, attorney staffing in the Enforcement Division at the close of the quarter stood at 19 staff attorneys, 5 team leaders (one in CELA), and 2 deputies.

¹ Starting with this report, we are listing active EPS matters within the Active column rather than part of the Inactive column to better reflect the status of our current caseload.

Table 1. Caseload

<u>CASELOAD</u>	Inactive	Active	Total
Number of Cases	38	123	161
Number of Reports Pending w/Commission*	0	36	36
FGCR	N/A	94	94
EPS	N/A	12	12
Investigation	N/A	4	4
Pre-Probable Cause Conciliation	N/A	13	13
Probable Cause/PC Brief	N/A	0	0



*As of 4/24/2025

Table 2. CELA Statistics

<u>CELA INITIAL CASE PROCESSING</u>	Current Quarter	YTD	2024	2023	2022	2021	2020	2019
Number of Cases Received	14	60	165	122	154	128	176	149
Number of Cases Rated	25	86	131	129	83	152	135	144
Average Days from Last Response to Rating (Goal: 30 days)	23	14	7	16	14	15	11	11
Ratings Meeting Goal	67% [18/27]	75% [66/88]	90% [118/131]	81% [104/129]	79% [85/108]	77% [117/152]	84% [114/135]	75% [108/144]
Number of Cases Activated	32	72	77	75	74	101	109	112
Average Days from Last Response to Activation (Goal: 90 Days)	105	166	108	86	99	77	39	47
Activations Meeting Goal	50% [16/32]	36% [26/72]	58% [45/77]	64% [48/75]	70% [52/74]	65% [66/101]	92% [100/109]	72% [81/112]
Number of Cases Dismissed Via EPS	35	48	40	26	20	42	18	44
Number of Cases Circulated Via EPS	31	66	39	15	27	34	24	49
Average Days from Assignment to Circulation of EPS Report	13	22	71	27	118	116	58	50
Number of Cases Transferred to ADRO	1	1	4	0	0	6	11	7
Average Days from Rating to Transfer to ADRO (Goal: 60 Days)	67	67	158	N/A	N/A	60	32	36
ADRO Transfers Meeting Goal	0% [0/1]	0% [0/1]	50% [2/4]	N/A [0/0]	N/A [0/0]	67% [4/6]	82% [9/11]	71% [5/7]

Table 3. Enforcement Statistics

<u>ENFORCEMENT PROCESS</u>	Current Quarter	YTD	2024	2023	2022	2021	2020	2019
First General Counsel’s Reports (“FGCRs”)								
Cases with FGCRs Circulated	32	54	82	69	88	128	103	143
Average Days from Activation to Circulation	148	146	164	169	231	165	153	177
FGCRs Meeting Established Time Goal	69% [22/32]	70% [38/54]	54% [44/82]	70% [48/69]	68% [60/88]	73% [93/128]	68% [70/103]	68% [97/143]
Pre-Probable Cause Conciliation (“PPCC”)								
Negotiations Commenced	11	25	78	35	114	103	2	79
Negotiations Concluded	22	33	51	89	92	49	12	84
Average Days in PPCC (Goal: 60 Days)	78	118	111	179	119	122	221	127
Number of Negotiations Meeting Goal	64%	53%	33%	19%	22%	65%	0%	30%
Investigations								
Investigations Commenced	0	0	4	2	7	12	1	31
Investigations Closed	0	0	1	6	9	22	8	10
Average Days in Investigation	N/A	N/A	932	437	862	660	549	634
Active Investigations at Close of Quarter	5							
Probable Cause								
Hearing Requests/Number Granted	0/0	0/0	0/0	1/1	2/2	1/1	1/1	1/1
Cases with Probable Cause Findings	0	0	2	1	2	2	0	0
Negotiated PC Settlements Approved	0	0	2	0	3	1	0	0
Average Days in PC Conciliation	N/A	N/A	146	N/A	841	29	N/A	N/A
Closed Cases								
Matters Closed	62	101	134	116	245	194	37	189
Matters Closed Within 15 Months	44 (71%)	63 (63%)	55 (41%)	62 (53%)	55 (34%)	66 (34%)	23 (62%)	106 (56%)
Average Days from Receipt to Closing	482	472	584	632	811	852	530	630
Civil Penalties	\$442,000	\$771,500	\$533,399.04	\$1,482,300	\$2,062,128	\$803,878	\$702,000	\$2,123,436

Table 4. Cases Pending Without a Commission Vote for 12 Months*

Matter	Case Name	Opened	Days Received to Close of Quarter	Circulation Date	Status Letter Date
1				(05/27/25)	11/14/24
2					N/A
3				(07/03/25)	N/A
4				(04/30/25)	04/10/24
5				(05/16/25)	01/17/24
6				(05/16/25)	01/17/24
7				(05/23/25)	04/15/25
8				(04/30/25)	04/10/24
9				(05/23/25)	02/13/24
10				(05/16/25)	02/13/24
11				04/11/25	04/03/25
12				(05/23/25)	04/03/25
13				(06/15 /25)	04/23/24
14				(06/15 /25)	04/23/24
15				(05/09/25)	N/A
16				04/07/25	04/29/24
17				01/31/25	07/16/24
18				(05/15/25)	07/22/24
19				03/21/25	05/13/24
20				(06/30/25)	07/30/24
21				(06/30/25)	07/30/24
22				(05/06/25)	10/21/24
23				(05/29/25)	10/23/24
24				(05/29/25)	10/23/24
25				(04/11/25)	09/27/24
26				(06/30/25)	N/A
27				(06/01/25)	04/16/25
28				02/27/25	04/03/25
29				12/19/24	02/12/25

Matter	Case Name	Opened	Days Received to Close of Quarter	Circulation Date	Status Letter Date
30				(05/09/25)	N/A
31				01/27/25	03/27/25
32				(04/30/25)	03/28/25
33				03/26/25	04/03/25
34				(06/12/25)	N/A
35				02/14/25	04/08/25
36				(07/03/25)	N/A
37				04/09/25	03/28/25
38				N/A	N/A
39				02/10/25	03/27/25
40				(05/09/25)	N/A

**A date in parenthesis is the date FGCR is expected to circulate*

	Matter	Case Name	Tolling	Opened	Earliest SOL	Latest SOL	Current Stage
1							
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29							

Table 6. Matters Beyond the Reason to Believe Stage

Matters	Case Name	Current Stage
1	<div></div>	
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16		

Table 7. First General Counsel's Reports Pending with the Commission at the End of the Quarter

Matter	Case Name	Receipt	Assigned	Circ.	# of Days Receipt to Circ.	# of Days Assigned to Circ.	# of Days Receipt to Close of Quarter	# of Days Assigned to Close of Quarter	# of Days Circ. to Close of Quarter	Held Over
1		02/06/24	09/24/24	12/19/24		86	419	188	102	01/28/25; 01/30/25
2		05/07/24	10/15/24	01/13/25		90	328	167	77	
3		02/09/24	12/10/24	01/27/25		48	416	111	63	
4		03/27/24	10/30/24	02/10/25		103	369	152	49	
5		02/26/24	10/17/24	02/14/25		120	399	165	45	
6		05/21/24	09/25/24	02/18/25		146	314	187	41	
7		01/02/24	07/02/24	02/27/25		240	454	272	32	03/25/25; 03/27/25
8		04/24/24	11/01/24	02/27/25		118	341	150	32	
9		05/13/24	11/01/24	02/27/25		118	322	150	32	
10		08/16/24	02/20/25	03/19/25		27	227	39	12	
11		05/10/23	12/12/24	03/21/25		99	691	109	10	
12		06/05/24	01/13/25	03/24/25		70	299	77	7	
13		08/21/24	12/31/24	03/24/25		83	222	90	7	
14		08/22/24	12/31/24	03/24/25		83	221	90	7	
15		10/02/24	01/16/25	03/24/25		67	180	74	7	
16		02/20/24	12/31/24	03/26/25		85	405	90	5	
17		04/22/24	11/07/24	03/27/25		140	343	144	4	
18		04/22/24	10/15/24	03/31/25		167	343	167	0	
19		08/13/24	02/11/25	03/31/25		48	230	48	0	

Table 8. Foreign National Matters

Matter #	Primary Respondent	Complainant	Receipt	Assigned	Last Response	Status	To DOJ	Country	Earliest SOL
1				03/20/25					
2				02/14/25					
3				03/18/25					