



**Federal Election Commission
Washington, DC 20463**

November 3, 2015

Craig Engle, Esq.
Arent Fox
1717 K Street NW
Washington, DC 20006

Re: ADR 780 (MUR 6921)
Committee to Elect Gwendolyn Beck to Congress and John A. Saylor, Treasurer,
Coalition of Independent Voices in Congress (CIVIC) and Cesar Augusto del
Aguila, Jr., Treasurer, Eagles Party PAC and Gwendolyn Joyce Beck, Treasurer,
Richard Kramer, Jeffrey Epstein, and Ginger Vuich

Dear Mr. Engle:

On March 11, 2015 the Federal Election Commission ("FEC" or "Commission") notified your client of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with the notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and take no further action against the Respondents the Eagles Party PAC and Gwendolyn J. Beck, Treasurer. In its memorandum to the Commission, dated October 16, 2015, this office stated:

Summary and Analysis of Case: The complaint filed by Christopher M. Marston (Complainant) alleges that the Committee to Elect Gwendolyn Beck to Congress and John A. Saylor, Treasurer (Beck Committee) and Ginger Vuich, former Treasurer (Respondent Vuich), the Coalition of Independent Voices in Congress and Cesar Augusto del Aguila, Jr., Treasurer (Respondent CIVIC), the Eagles Party PAC and Gwendolyn Joyce Beck, Treasurer, (Respondent EPP), Richard Kramer (Respondent Kramer), and Jeffrey Epstein (Respondent Epstein) (collectively Respondents), violated contribution limits due to the fact that the Beck Committee, Respondent CIVIC and Respondent EPP were affiliated, and thus shared a single contribution limit. Specifically, Respondents CIVIC and EPP each registered as non-connected political committees with the Commission. The Complainant asserts that although Respondents CIVIC and EPP failed to note any affiliation, it appears

the two are affiliated committees, and as such share a single contribution limit. According to the complaint, both committees were established and controlled by Gwendolyn Joyce Beck (Respondent Beck), while Respondent CIVIC was financed by Respondent Epstein and Respondent EPP was financed by Respondent Epstein and Respondent Kramer.

The complaint also alleges that CIVIC received only one contribution - a \$5,000 contribution by Epstein on July 11, 2014. In turn, CIVIC contributed \$2,600 to the Beck Committee on November 5, 2014. EPP received all its funds from Respondent Beck (\$1,700), Epstein (\$5,000) and Kramer (\$5,000), and made a single \$2,600 contribution to the Beck Committee on November 5, 2014. According to the complaint, CIVIC and EPP, as affiliated committees, shared a single contribution limit of \$2,600, which they exceeded when they each contributed \$2,600 to the Beck Committee on November 5, 2014.

The Beck Committee contends that the registration error of the Respondents CIVIC and EPP committees was due to inexperience, and that Respondents worked with the Commission to make refunds and file amended reports to correct the record. Respondents Epstein and Kramer contend that they made legal contributions and had no knowledge of any affiliation between the committees. In addition, both confirmed they received refunds of their contributions.

While a violation occurred, there appears to have been a lack of understanding of the reporting requirements, and the amount in violation is *de minimis*. Thus, it may not be worth Commission resources to pursue this matter, and a dismissal is recommended.

Accordingly, the Commission closed its file in this matter on November 2, 2015.

The FEC is obligated by federal regulations to make a finding to terminate its proceedings public, as well as the basis therefore. 11 C.F.R. § 111.20(b). In addition, the Commission will also place on the record copies of the complaint, correspondence exchanged between Respondent(s) and the Commission, and reports prepared for the Commission by this office to assist in its consideration of this matter. Accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC's Public Information Office.

If you have any questions regarding this matter please be in touch. My telephone number is 202-694-1665.

Sincerely,

Lynn M. Fraser, Director,
Alternative Dispute Resolution Office