

1 disclosed \$10,515 in receipts and \$7,597.31 in disbursements.⁵ The 2021 Mid-Year Report
2 disclosed \$7,530 in disbursements related to billboards and newspaper advertisements.⁶

3 Based on its experience and expertise, the Commission has established an Enforcement
4 Priority System using formal, pre-determined scoring criteria to allocate agency resources and
5 assess whether particular matters warrant further administrative enforcement proceedings. These
6 criteria include (1) the gravity of the alleged violation, taking into account both the type of activity
7 and the amount in violation; (2) the apparent impact the alleged violation may have had on the
8 electoral process; (3) the complexity of the legal issues raised in the matter; and (4) recent trends in
9 potential violations and other developments in the law. This matter is rated as low priority for
10 Commission action after application of these pre-established criteria. Given that low rating, the
11 remedial actions of the Respondent, and the low dollar amount involved, we recommend that the
12 Commission dismiss the Complaint consistent with the Commission's prosecutorial discretion to
13 determine the proper ordering of its priorities and use of agency resources.⁷ We also recommend

⁵ Citizen Facts PAC 2021 Mid-Year Report at 2 (Nov. 8, 2021),
<https://docquery.fec.gov/pdf/207/202111089468444207/202111089468444207.pdf>.


⁶ *Id.* at 12.

⁷ *Heckler v. Chaney*, 470 U.S. 821, 831-32 (1985).

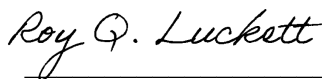
1 that the Commission close the file as to the Respondent and send the appropriate letters.


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