



FEDERAL ELECTION COMMISSION
Washington, DC 20463

VIA ELECTRONIC AND CERTIFIED MAIL
RETURN RECEIPT REQUESTED

robyn@c2gstrategies.com

October 17, 2022

Robyn Cain
C2G Strategies, LLC
7410 Waterfall Drive
McKinney, TX 75072

RE: MUR 7950

Dear Ms. Cain:

On October 12, 2022, the Federal Election Commission reviewed the allegations in your complaint received December 23, 2021, and on the basis of the information provided in the complaint, and information provided by respondents, decided to exercise its prosecutorial discretion to dismiss the allegations as to Friends of Jessica Mason and Kevin Jagnarain in his official capacity as treasurer; Jessica Mason. Accordingly, on October 12, 2022, the Commission closed the file in this matter.

Documents related to the case will be placed on the public record within 30 days. *See Disclosure of Certain Documents in Enforcement and Other Matters*, 81 Fed. Reg. 50,702 (Aug. 2, 2016), effective September 1, 2016. A copy of the General Counsel's Report, which more fully explains the Commission's finding, is enclosed.

The Federal Election Campaign Act of 1971, as amended, allows a complainant to seek judicial review of the Commission's dismissal of this action. *See* 52 U.S.C. § 30109(a)(8).

Sincerely,

Lisa J. Stevenson
Acting General Counsel

Roy Q. Luckett

BY: Roy Q. Luckett
Acting Assistant General Counsel

Enclosure
General Counsel's Report

BEFORE THE FEDERAL ELECTION COMMISSION
ENFORCEMENT PRIORITY SYSTEM
DISMISSAL REPORT

MUR: 7950

Respondents: Friends of Jessica Mason
and Kavın Jagnarain in his
official capacity as treasurer
Jessica Mason

Complaint Receipt Date: December 23, 2021

Response Date: January 3, 2022

Alleged Statutory

52 U.S.C. § 30104(b)(8);

Regulatory Violations:

11 C.F.R. §§ 104.3(d), 104.11

The Complaint alleges that Friends of Jessica Mason and Kavın Jagnarain in his official capacity as treasurer (the “Committee”) did not pay a \$665 invoice billed by C2G Strategies, LLC (“C2G”), on September 14, 2021, for services provided by C2G to the Committee.¹ The Complaint further alleges that the Committee failed to report the debt on its FEC disclosure reports.²

The Response states that the Committee notified C2G on December 28, 2021, that it intended to pay the outstanding invoice despite disputing the alleged debt in question.³ The Response asserts that the Committee issued an electronic payment to C2G with an effective date of January 4, 2022.⁴

Based on its experience and expertise, the Commission has established an Enforcement Priority System using formal, pre-determined scoring criteria to allocate agency resources and

¹ Compl. at 1 (Dec. 23, 2021). The Complaint states that the Committee’s treasurer indicated on November 18, 2021, that the Committee intended to pay the invoice, but that C2G did not receive any payment. *Id.*

² *Id.*

³ Friends of Jessica Mason Resp. at 1 (Jan. 3, 2022).

⁴ *Id.* The Committee did not report the debt on any of its reports with the Commission, disputed or otherwise, but its 2022 Pre-Primary Report disclosed a \$665 disbursement to C2G on January 4, 2022. Friends of Jessica Mason 2022 Pre-Primary Report at 66 (February 16, 2022). <https://docquery.fec.gov/cgi-bin/fecimg/?202202169491744639>.

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


11 Lisa J. Stevenson
12 Acting General Counsel
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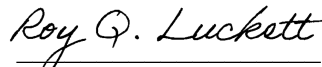
15 Charles Kitcher
16 Associate General Counsel
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18
19 9/29/2022

20 Date

21 BY:

22 
23 Claudio J. Pavia
24 Deputy Associate General Counsel
25

26 
27 Roy Q. Luckett
28 Acting Assistant General Counsel
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30 
Donald E. Campbell
Attorney

⁵ *Heckler v. Chaney*, 470 U.S. 821, 831-32 (1985).