



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

March 17, 2025

**VIA UPS DELIVERY AND EMAIL**

Joseph Ahearn  
AM Strategy Group, LLC  
508 N. Greenbrier Street  
Arlington, VA 22203

RE: MUR 8081  
J. R. Majewski for Congress

Dear Mr. Ahearn:

This is in reference to the complaint filed with the Federal Election Commission on October 26, 2022, concerning J. R. Majewski for Congress. Based on that complaint, and after considering the circumstances of this matter and information provided in response to the complaint, the Commission determined to dismiss this matter and close the file. Through an administrative oversight this letter and associated enclosure were not sent, and you were not timely notified of the Commission's determination. We apologize for the inconvenience.

The General Counsel's Report, which more fully explains the basis for the Commission's decision, is enclosed. Documents related to the case were placed on the public record when the file was closed. *See Disclosure of Certain Documents in Enforcement and Other Matters*, 81 Fed. Reg. 50,702 (Aug. 2, 2016).

The Federal Election Campaign Act of 1971, as amended, allows a complainant to seek judicial review of the Commission's dismissal of this action within 60 days of the dismissal. *See* 52 U.S.C. § 30109(a)(8).

Sincerely,

Lisa J. Stevenson  
Acting General Counsel

*Wanda D. Brown*

BY: Wanda D. Brown  
Assistant General Counsel

Enclosure  
General Counsel's Report

## SENSITIVE

**BEFORE THE FEDERAL ELECTION COMMISSION**

**ENFORCEMENT PRIORITY SYSTEM**

**DISMISSAL REPORT**

**MUR:** 8081

**Respondent:** J.R. Majewski for Congress and J.R. Majewski in his official capacity as treasurer

**Complaint Receipt Date:** October 26, 2022

**Response Date:** December 8, 2022

**Alleged Statutory and Regulatory Violations:** 52 U.S.C. § 30104(b); 11 C.F.R. §§ 104.3(a) and (b), 116.2(c)

17 The Complaint alleges that J.R. Majewski for Congress and J.R. Majewski in his official  
18 capacity as treasurer (the “Committee”), the principal campaign committee of 2022 candidate for  
19 Ohio’s 9th Congressional district, J.R. Majewski, violated the Federal Election Campaign Act of  
20 1971, as amended, by failing to report a debt in the amount of \$10,000 to AM Strategy Group for  
21 fundraising consulting services.<sup>1</sup> According to the Complaint, Majewski, on behalf of the  
22 Committee, signed a contract with AM Strategy Group on March 7, 2022, for fundraising  
23 consulting services and AM Strategy Group rendered services according to the terms of the  
24 agreement.<sup>2</sup> The Complaint alleges, however, that despite sending invoices to the Committee on  
25 multiple occasions, the Committee has failed to pay what it owes and, therefore, should have  
26 listed a debt to AM Strategy Group in the amount of \$10,000 on the relevant disclosure report.<sup>3</sup>

<sup>1</sup> Compl. ¶¶ 1, 3 (Oct. 26, 2022); *id.*, Attach. C (letter from AM Strategy Group to Majewski dated June 28, 2022, notifying Majewski of the debt and asking the Committee to either pay the debt or else report it on its FEC disclosure report).

<sup>2</sup> *Id.* ¶ 1. The Complaint states that, per the terms of the agreement, payment was supposed to be remitted within 10 days of receipt of the first invoice on April 1, 2022. Compl. ¶ 5; *id.*, Attach. D (contract between AM Strategy Group and J.R. Majewski for Congress dated March 7, 2022).

3 *Id.* ¶¶ 5-10.

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EPS Dismissal Report

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1        The Committee’s Response, submitted by the former treasurer, characterizes the debt as  
2        “disputed” and asserts that the treasurer was unaware of the disputed debt until the Complaint  
3        was filed, and that the Committee’s reports have been amended to reflect the debt.<sup>4</sup> A review of  
4        the Committee’s 2022 Pre-General Report confirms that on November 11, 2022, the Committee  
5        disclosed a debt to AM Strategy Group in the amount of \$10,000.<sup>5</sup> Finally, the Response  
6        contends that the matter is a “contract dispute” over which the Commission has no jurisdiction.<sup>6</sup>

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

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<sup>4</sup>        Resp. at 1 (Dec. 8, 2022). The Response was submitted by Sean Tarnowski, Committee treasurer at the time of the Complaint. J.R. Majewski for Congress, Statement of Organization (Apr. 14, 2023), <https://docquery.fec.gov/pdf/684/202304149580426684/202304149580426684.pdf>.

<sup>5</sup>        J.R. Majewski for Congress, 2022 Amended Pre-General Report at 74 (Nov. 11 2022), <https://docquery.fec.gov/pdf/844/20221109546751844/20221109546751844.pdf>.

<sup>6</sup>        Resp. at 1.

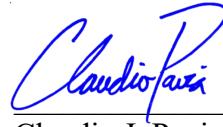
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1 ordering of its priorities and use of agency resources.<sup>7</sup> We also recommend that the Commission  
2 close the file as to the Respondent and send the appropriate letters.

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4 Lisa J. Stevenson  
5 Acting General Counsel  
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13  
14 12/20/2023  
15  
16 Date

17 Charles Kitcher  
18 Associate General Counsel for  
19 Enforcement  
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BY:

  
Claudio J. Pavia  
Deputy Associate General Counsel  
for Enforcement

  
Wanda D. Brown  
Wanda Brown  
Assistant General Counsel

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