



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

November 15, 2024

By UPS

Michael J. Trainor

[REDACTED]
Tavares, FL 32775

RE: MUR 8158
Sabatini for Congress and
Elizabeth Curtis in her official
capacity as treasurer
Anthony Sabatini

Dear Mr. Trainor:

On October 16, 2024, the Federal Election Commission reviewed the allegations in your Complaint received August 21, 2023, and on the basis of the information provided in the Complaint and information provided by the respondents, determined to exercise its prosecutorial discretion to dismiss the allegations contained in the Complaint. Accordingly, the Commission closed the file in this matter.

Documents related to the case will be placed on the public record today. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 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 within 60 days of the dismissal, which became effective today. *See* 52 U.S.C. § 30109(a)(8).

MUR 8158 (Sabatini for Congress, *et al.*)

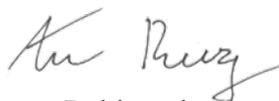
Letter to the Complainant

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If you have any questions, please contact Kenneth Sealls, the attorney assigned to this matter, at (202) 694-1210.

Sincerely,

Lisa J. Stevenson
Acting General Counsel

A handwritten signature in cursive script, appearing to read "Aaron Rabinowitz".

BY: Aaron Rabinowitz
Assistant General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

ENFORCEMENT PRIORITY SYSTEM

DISMISSAL REPORT

MUR: 8158

Respondents: Sabatini for Congress and
Elizabeth Curtis in her official
capacity as treasurer
Anthony Sabatini

Complaint Receipt Date: August 21, 2023

Response Dates: August 25, 2023

**Alleged Statutory and
Regulatory Violations:**

52 U.S.C. § 30124(b)(1)

52 U.S.C. § 30125(e)(1)(A)

11 C.F.R. § 110.16(b)(1)

11 C.F.R. § 300.61

The Complaint alleges that 2024 congressional candidate Anthony Sabatini and his principal campaign committee, Sabatini for Congress and Elizabeth Curtis in her official capacity as treasurer,¹ violated the Federal Election Campaign Act of 1971, as amended (the “Act”), when Sabatini sent an email inviting recipients to the Lake County Republican Party Annual Lincoln Reagan Dinner that “gives the reader the strong impression that [the Dinner] is an event for ‘Team Sabatini,’ which is not the case,” thus raising allegations under the Act’s fraudulent misrepresentation provision.² The email also raises allegations that Sabatini solicited soft money both on behalf of the Lake County Republican Party, a subordinate committee of the Republican Party, when he invited recipients to purchase tickets to the Dinner as well as on

¹ Sabatini withdrew from the race and did not participate in the primary election. Greg Fox, *Anthony Sabatini Drops Out of Republican Primary for House District 11 After Trump Endorses Opponent*, WESH2 (June 14, 2024), <https://www.wesh.com/article/anthony-sabatini-drops-out-of-race/61102775> (reporting that Sabatini withdrew from the race for Florida’s 11th Congressional District on June 13, 2024).

² Compl. at 1 (Aug. 21, 2023).

1 behalf of Save America, a leadership PAC, when he asked recipients to make contribution of
2 “any amount” to the PAC.³

3 Respondents deny that they diverted “sales of tickets into donations” and contend that
4 “the email was sent from a private campaign-controlled/owned email list . . . list[ing] a link to an
5 entirely separate event, solely because members of the campaign team will be in attendance at
6 said event and it’s an opportunity to meet and say hello.”⁴

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, we recommend that the Commission dismiss the Complaint consistent with the
16 Commission’s prosecutorial discretion to determine the proper ordering of its priorities and use
17 of agency resources⁵ and close the file as to all Respondents effective 30 days from the date the

³ *Id.*, Ex. 1 at 3.

⁴ Resp. at 1 (Aug. 25, 2023).

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

1 certification of this vote is signed (or on the next business day after the 30th day, if the 30th day
2 falls on a weekend or holiday) and send the appropriate letters.

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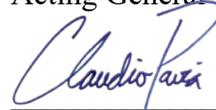
Lisa J. Stevenson
Acting General Counsel

5 October 2, 2024

6 Date

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BY:



Claudio J. Pavia
Deputy Associate General Counsel

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Aaron Rabinowitz
Assistant General Counsel

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Kenneth E. Sealls
Attorney