



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

November 15, 2024

**By Electronic Mail**

[anthony@SabatiniLegal.com](mailto:anthony@SabatiniLegal.com)

Anthony Sabatini  
Sabatini Law Firm P.A.  
411 N Donnelly St Suite #313  
Mount Dora, FL 32757

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

Dear Mr. Sabatini:

On August 24, 2023, the Federal Election Commission notified Sabatini for Congress and Elizabeth Curtis in her official capacity as treasurer (the "Committee") and you, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on October 16, 2024, voted to dismiss this matter effective November 15, 2024.

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.

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

Sincerely,

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

Aaron Rabinowitz  
Assistant General Counsel

1 **BEFORE THE FEDERAL ELECTION COMMISSION**  
 2 **ENFORCEMENT PRIORITY SYSTEM**  
 3 **DISMISSAL REPORT**

4 **MUR:** 8158

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

8 **Complaint Receipt Date:** August 21, 2023

9 **Response Dates:** August 25, 2023



11 **Alleged Statutory and**  
 12 **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

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

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<sup>1</sup> 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).

<sup>2</sup> 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.<sup>3</sup>

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.”<sup>4</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, 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 resources<sup>5</sup> and close the file as to all Respondents effective 30 days from the date the

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<sup>3</sup>       *Id.*, Ex. 1 at 3.

<sup>4</sup>       Resp. at 1 (Aug. 25, 2023).

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

MUR 8158 (Sabatini for Congress, *et al.*)  
EPS Dismissal Report  
Page 3 of 3

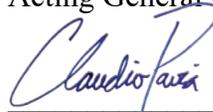
1 certification of this vote is signed (or on the next business day after the 30th day, if the 30th day  
2 falls on a weekend or holiday) and send the appropriate letters.

3 Lisa J. Stevenson  
4 Acting General Counsel

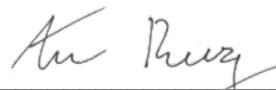
5 October 2, 2024

6 Date

BY:



\_\_\_\_\_  
Claudio J. Pavia  
Deputy Associate General Counsel



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Aaron Rabinowitz  
Assistant General Counsel

11 *Kenneth E. Sealls*  
12 \_\_\_\_\_  
13 Kenneth E. Sealls  
Attorney