



FEDERAL ELECTION COMMISSION  
Washington, DC

**VIA ELECTRONIC MAIL ONLY**

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Kristina S. Heuser, Esq.  
Attorney for Respondents  
305 5th Avenue South, Suite 204-K  
Naples, FL 34102

January 2, 2025

RE: MUR 8234 (Keith Gross for Florida)

Dear Ms. Heuser:

On April 1, 2024, the Federal Election Commission notified your client, Keith Gross for Florida and Jason Boles, in his official capacity as treasurer, 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 your client at that time.

Upon further review of the allegations contained in the complaint and information supplied by you, the Commission, on November 27, 2024, voted to dismiss this matter effective January 2, 2025. Any applicable Factual and Legal Analysis or Statements of Reasons available at the time of this letter’s transmittal are enclosed.

Sincerely,

*Wanda D. Brown*

Wanda D. Brown  
Assistant General Counsel

Enclosure:  
Enforcement Priority System Dismissal Report



1           Based on its experience and expertise, the Commission has established an Enforcement  
2 Priority System using formal, pre-determined scoring criteria to allocate agency resources and  
3 assess whether particular matters warrant further administrative enforcement proceedings. These  
4 criteria include (1) the gravity of the alleged violation, taking into account both the type of  
5 activity and the amount in violation; (2) the apparent impact the alleged violation may have had  
6 on the electoral process; (3) the complexity of the legal issues raised in the matter; and (4) recent  
7 trends in potential violations and other developments in the law. This matter is rated as low  
8 priority for Commission action after application of these pre-established criteria. Given that low  
9 rating, and the apparent low dollar amount at issue, we recommend that the Commission dismiss  
10 the Complaints consistent with the Commission's prosecutorial discretion to determine the  
11 proper ordering of its priorities and use of agency resources.<sup>4</sup> We also recommend that the  
12 Commission close the file effective 30 days from the date the certification of this vote is signed  
13 (or on the next business day after the 30th day, if the 30th day falls on a weekend or holiday),  
14 and send the appropriate letters.

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<sup>4</sup> *Heckler v. Chaney*, 470 U.S. 821, 831-32 (1985).

