



FEDERAL ELECTION COMMISSION  
Washington, DC

February 7, 2025

**VIA ELECTRONIC MAIL**

butch@butchbowers.com  
Karl S. "Butch" Bowers Jr.  
Bowers Law Office  
1419 Pendleton Street  
Columbia, SC 29201

RE: MUR 8241  
William Timmons for Congress, *et al.*

Dear Mr. Bowers:

On April 19, 2024, the Federal Election Commission notified your clients, William Timmons, William Timmons for Congress, and Lisa Lisker, in her 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 clients at that time.

Upon further review of the allegations contained in the complaint, and information supplied by your clients, the Commission, on January 8, 2025, voted to dismiss this matter effective February 7, 2025. The General Counsel's Report, which more fully explains the Commission's decision, is enclosed for your information.

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).

Sincerely,

Lisa J. Stevenson  
Acting General Counsel

*Wanda D. Brown*

BY: Wanda D. Brown  
Assistant General Counsel

Enclosure  
General Counsel's Report

1 **BEFORE THE FEDERAL ELECTION COMMISSION**

2  
3 **ENFORCEMENT PRIORITY SYSTEM**  
4 **DISMISSAL REPORT**

5  
6 **MUR:** 8241

**Respondents:** William Timmons for Congress and  
Lisa Lisker in her official capacity as  
treasurer  
William Timmons

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12 **Complaint Receipt Date:** April 15, 2024  
13 [REDACTED]  
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15 **Alleged Statutory/  
16 Regulatory Violations:**

52 U.S.C. § 30120(a), (c)  
11 C.F.R. § 110.11

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19 The Complaint alleges that William Timmons for Congress and Lisa Lisker in her official  
20 capacity as treasurer (the “Committee”), the principal campaign committee for Congressman  
21 William Timmons, a 2024 candidate for South Carolina’s 4th Congressional District, sent public  
22 communications in the form of text messages without required disclaimers, in violation of the  
23 Federal Election Campaign Act of 1971, as amended (the “Act”).<sup>1</sup> The Complaint identifies the  
24 Committee as the source of these text messages by linking them, through a common phone number,  
25 to a prior text message containing a hyperlink to a fundraising web page bearing a Committee  
26 disclaimer.<sup>2</sup> The Committee filed a Response stating that the text messages were “perfectly legal”  
27 and compliant with the Commission’s disclaimer rules as applied to small digital advertisements.<sup>3</sup>

28 Based on its experience and expertise, the Commission has established an Enforcement  
29 Priority System using formal, pre-determined scoring criteria to allocate agency resources and  
30 assess whether particular matters warrant further administrative enforcement proceedings. These

<sup>1</sup> Compl. at 1 (Apr. 15, 2024).

<sup>2</sup> *Id.*, Ex. 1 at 2-3 (showing a text message containing a hyperlink to a WinRed page supporting the Committee).

<sup>3</sup> Resp. at 1 (July 15, 2024).

1 criteria include (1) the gravity of the alleged violation, taking into account both the type of activity  
2 and the amount in violation; (2) the apparent impact the alleged violation may have had on the  
3 electoral process; (3) the complexity of the legal issues raised in the matter; and (4) recent trends in  
4 potential violations and other developments in the law. This matter is rated as low priority for  
5 Commission action after application of these pre-established criteria. Given that low rating, and  
6 low apparent dollar amount at issue, we recommend that the Commission dismiss the Complaint  
7 consistent with the Commission's prosecutorial discretion to determine the proper ordering of its  
8 priorities and use of agency resources.<sup>4</sup> We also recommend that the Commission close the file  
9 effective 30 days from the date the certification of its vote is signed (or on the next business day  
10 after the 30th day, if the 30th day falls on a weekend or holiday) and send the appropriate letters.

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17 December 11, 2024  
18 Date

Lisa J. Stevenson  
Acting General Counsel

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BY:



Claudio J. Pavia  
Deputy Associate General Counsel

*Wanda D. Brown*

Wanda D. Brown  
Assistant General Counsel

*Jacob P. Tully*

Jacob P. Tully  
Attorney

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