



FEDERAL ELECTION COMMISSION
Washington, DC

March 17, 2025

VIA ELECTRONIC MAIL

VRPitta@Pittalaw.com

Vito R. Pitta, Esq.

Pitta LLP

120 Broadway, 28th Floor

New York, NY 10271

RE: MUR 8249

Dear Mr. Pitta:

On April 30, 2024, the Federal Election Commission notified your client, MartinDolanforCongress and Martin W. Dolan 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 in response, the Commission, on February 12, 2025, voted to dismiss this matter and close the file effective March 17, 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). If you have any questions, please contact Dominique Dillenseger, the attorney assigned to the matter, at (202) 694-1650.

Sincerely,

Aaron Rabinowitz

Aaron Rabinowitz
Assistant General Counsel

Enclosure
General Counsel's Report

1 In response, the Committee acknowledges making errors in its original 2024 April
2 Quarterly Report, states that it has filed an amended report, and explains that the errors resulted
3 from confusion following the changing of district lines during the election cycle and the
4 Committee’s inexperience with using FECfile to submit reports.⁴ The Committee also states that
5 it has since retained counsel and hired experienced staff to assist with filing reports.⁵ The
6 Committee’s Response also addresses each of the reporting errors listed in the Complaint,
7 acknowledging the error and explaining how it was corrected.⁶ A review of the Committee’s
8 amended 2024 April Quarterly Reports reflect the corrections addressed in the response.⁷

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

⁴ Resp. at 2 (June 17, 2024). The Committee filed two amendments to its original 2024 April Quarterly Report filed on April 15, 2024: First Amended 2024 April Quarterly Report (June 7, 2024), Second Amended 2024 April Quarterly Report (Aug. 19, 2024).

⁵ Resp. at 2.

⁶ *Id.* at 2-4.

⁷ First Amended 2024 April Quarterly Report (June 7, 2024); Second Amended 2024 April Quarterly Report (Aug. 19, 2024).

MUR 8249 (MartinDolanforCongress)
EPS Dismissal Report
Page 3 of 3

1 of agency resources.⁸ We also recommend that the Commission close the file effective 30 days
2 from the date the certification of this vote is signed (or on the next business day after the 30th
3 day, if the 30th day falls on a weekend or holiday), and send the appropriate letters.

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January 31, 2025

Date

Lisa J. Stevenson
Acting General Counsel

BY:



Claudio J. Pavia
Deputy Associate General Counsel

Aaron Rabinowitz

Aaron Rabinowitz
Assistant General Counsel

Dominique Dillenseger

Dominique Dillenseger
Attorney

⁸ See *Heckler v. Chaney*, 470 U.S. 821, 831-32 (1985).