

1 The Committee, in response, generally denies the allegations and states that the
2 Complaint “invented an amount and story that somehow people were being defrauded.”⁵ Since
3 the May 22, 2024 Complaint, the Committee filed an Amended Statement of Organization on
4 June 9, 2024, and two disclosure reports,⁶ a July 2024 Quarterly Report and an October 2024
5 Quarterly Report.⁷ In the July 2024 Quarterly Report, the Committee disclosed \$14,090 in total
6 receipts and \$14,469.40 in total disbursements during the period of August 5, 2022, through June
7 30, 2024, which includes the period at issue in the Complaint after the Committee’s
8 administrative termination up through and past its Amended Statement of Organization.⁸ In its
9 October 2024 Quarterly Report, the Committee disclosed \$15 in total receipts and no
10 disbursements during the period of July 1, 2024 to September 30, 2024.⁹

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

⁵ *See Resp.* at 1 (Oct. 16, 2024).

⁶ New Coalition PAC, Amended Statement of Organization.

⁷ New Coalition PAC, July 2024 Quarterly Report (July 3, 2024), <https://docquery.fec.gov/pdf/845/202407039652558845/202407039652558845.pdf>; New Coalition PAC, October 2024 Quarterly Report, <https://docquery.fec.gov/pdf/084/202410169698538084/202410169698538084.pdf>.

⁸ New Coalition PAC, July 2024 Quarterly Report at 2.

⁹ New Coalition PAC, October 2024 Quarterly Report at 2.

1 rating, and the low apparent dollar amount at issue, we recommend that the Commission dismiss
2 the Complaint consistent with the Commission's prosecutorial discretion to determine the proper
3 ordering of its priorities and use of agency resources.¹⁰ We also recommend that the
4 Commission close the file effective 30 days from the date the certification of this vote is signed
5 (or on the next business day after the 30th day, if the 30th day falls on a weekend or holiday),
6 and send the appropriate letters.

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November 20, 2024
Date

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¹⁰ See *Heckler v. Chaney*, 470 U.S. 821, 831-32 (1985).