



FEDERAL ELECTION COMMISSION
Washington, DC

May 12, 2025

VIA ELECTRONIC MAIL ONLY

[REDACTED]
David L. Engler, Esq.
Attorney for Respondent
[REDACTED]
Warren, OH 44483

RE: MUR 8280
(TCR Grassroots PAC)

Dear Mr. Engler:

On July 1, 2024, the Federal Election Commission notified your client, TCR Grassroots PAC and Regina McManus, 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 client at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on April 9, 2025, voted to dismiss the matter effective May 12, 2025. The General Counsel's Report, which more fully explains the Commission's decision, is enclosed for your information.

Documents related to the cases 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,

Aaron Rabinowitz

Aaron Rabinowitz
Assistant General Counsel

Enclosure:
Enforcement Priority System Dismissal Report

BEFORE THE FEDERAL ELECTION COMMISSION
ENFORCEMENT PRIORITY SYSTEM
DISMISSAL REPORT

MUR 8280

Respondent: TCR Grassroots PAC and
Regina McManus in her
official capacity as treasurer

Complaint Receipt Date: June 24, 2024

Response Date: Aug. 9, 2024

Alleged Statutory/

Regulatory Violations: 52 U.S.C. §§ 30103, 30104(a), 30120(a), 30124
11 C.F.R. §§ 102.1(d), 104.1, 110.11(a)-(c), 110.16

The Complaint [REDACTED] allege that TCR Grassroots PAC and Regina McManus in her official capacity as treasurer, a multi-candidate political action committee, violated the Federal Election Campaign Act of 1971, as amended (the “Act”), and Commission regulations when it: (1) failed to timely register with the Commission as a political committee in March 2024; (2) disseminated campaign literature and social media posts without disclaimers; (3) failed to file disclosure reports for the period between January 1, 2024, and March 1, 2024; and (4) apparently fraudulently misrepresented that it acted on behalf of the Trumbull County Republican Party.¹

¹ Compl. at 1-2, MUR 8280 (May 26, 2024); [REDACTED]

Respondent states that it filed its Statement of Organization on March 11, 2024, and represents that it began operations on February 1, 2024.² Regarding its financial activities and disclosures, Respondent states that its total receipts and disbursements for the period in question was \$1,543 which were in-kind contributions from its treasurer and used to produce slate cards.³ This activity was apparently reported on TCR Grassroots PAC's 2024 April Quarterly Report, dated April 15, 2024, covering the period January 1, 2024, to March 1, 2024.⁴ Regarding the disclaimer issue, Respondent states that the Complaint "conflated other personal/protected speech by Regina McManus [the committee's treasurer] as PAC activity."⁵ Regarding the apparent fraudulent misrepresentation violation, again, Respondent states that the activity in question, online social media posts, were not the committee's activity and that its only activity was to produce slate cards.⁶

Based on its experience and expertise, the Commission has established an Enforcement Priority System using formal, pre-determined scoring criteria to allocate agency resources and assess whether particular matters warrant further administrative enforcement proceedings. These criteria include (1) the gravity of the alleged violation, taking into account both the type of activity and the amount in violation; (2) the apparent impact the alleged violation may have had on the electoral process; (3) the complexity of the legal issues raised in the matter; and (4) recent

² Resp. at 1, MUR 8280 (Aug. 12, 2024); TCR Grassroots PAC, Statement of Organization (March 11, 2024), <https://www.fec.gov/data/committee/C00872960/?tab=filings>.

³ Resp. at 1.

⁴ *Id.*; TCR Grassroots PAC, FEC Form 3x, (Apr. 15, 2024). The committee initially filed its 2024 April Quarterly Report by mail, dated April 15, 2024, without itemizing its receipts and disbursements. On April 30, 2024, the Commission's Reports Analysis Division issued a Request for Additional Information instructing the PAC to file its report electronically. On June 3, 2024, the PAC electronically filed its report, itemizing its receipts and disclosures, as well as a Form 99, explaining its receipt of in-kind contribution from its treasurer and its expenditures.

⁵ Resp. at 1, MUR 8280.

⁶ *Id.*

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EPS Dismissal Report
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1 trends in potential violations and other developments in the law. This matter is rated as low
2 priority for Commission action after application of these pre-established criteria. Given that low
3 rating, and the low dollar amount at issue, we recommend that the Commission dismiss the
4 Complaint consistent with the Commission's prosecutorial discretion to determine the proper
5 ordering of its priorities and use of agency resources.⁷ We also recommend that the Commission
6 close the file in MUR 8280 effective 30 days from the date the certification of this vote is signed
7 (or on the next business day after the 30th day, if the 30th day falls on a weekend or holiday),
8 [REDACTED] and send the appropriate letters.

9 Lisa J. Stevenson
10 Acting General Counsel

11
12
13
14 March 31, 2025
15 Date

16 BY:

17 *AR*
18 Claudio J. Pavia
19 Claudio J. Pavia
20 Deputy Associate General Counsel for
21 Enforcement

22 *Aaron Rabinowitz*
23 Aaron Rabinowitz
24 Assistant General Counsel

25 *Rocelyn Halili*
26 Rocelyn Halili
27 Attorney

⁷ *Heckler v. Chaney*, 470 U.S. 821, 831-32 (1985).