



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

VIA ELECTRONIC MAIL

Joseph A. Bondy
1776 Broadway, Ste. 2000
New York, NY 10019
josephbondy@mac.com

March 12, 2025

RE: MUR 8283

Dear Mr. Bondy:

On July 12, 2024, the Federal Election Commission notified your clients, Paula Collins for Congress and Jacqueline Manuel in her official capacity as treasurer and Paula Collins, of a Complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. On February 5, 2025, based on the information provided in the Complaint and information provided by your clients, the Commission determined to exercise its prosecutorial discretion to dismiss the allegations contained in the Complaint. Accordingly, the Commission closed its file in this matter. Enclosed for your information is a copy of the General Counsel's Report, which more fully explains the Commission's decision.

The Commission will place documents related to the case 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 Justine A. di Giovanni, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,

Lisa J. Stevenson
Acting General Counsel

Wanda D. Brown

BY: Wanda D. Brown
Assistant General Counsel

Enclosure:
General Counsel's Report

BEFORE THE FEDERAL ELECTION COMMISSION

ENFORCEMENT PRIORITY SYSTEM

DISMISSAL REPORT

MUR 8283

Respondent: Paula Collins for Congress and Jacqueline Manuel in her official capacity as treasurer
Paula Collins

Complaint Receipt Date: July 5, 2024

Response Date: July 31, 2024

EPS Rating:

Alleged Statutory Violation: 52 U.S.C. § 30114(b)

12 The Complaint alleges that Paula Collins for Congress and Jacqueline Manuel in her official
13 capacity as treasurer (the “Committee”) and Paula Collins converted campaign funds to personal use,
14 in violation of the Federal Election Campaign Act of 1971, as amended (the “Act”).¹ According to
15 the Complaint, the Committee made two payments totaling \$2,700 to White Pillars, a former bed and
16 breakfast located in Canton, New York now catering to long-term guests, for the rent of a residential
17 property called the Amish Country Inn.² The Complaint alleges that these payments were for
18 Collins’s personal residence.³

19 Collins and the Committee deny the allegations.⁴ While their Response does not specifically
20 state that Collins does not reside at the Amish Country Inn, and notes that the Committee “may have
21 misunderstood” the Act, it states that the Amish Country Inn was used as a “combined office and a

¹ Compl. at 1-2 (July 5, 2024).

² *Id.* The Committee's disclosure reports show a third payment \$1,350, raising the total to \$4,050. *FEC Disbursements: Filtered Results*, FEC.GOV, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00869123&recipient_name=white+pillars (last visited Jan. 21, 2025) [hereinafter White Pillars Disbursements] (reflecting all disbursements by the Committee to White Pillars).

³ Compl. at 1-2.

4 Resp. at 1 (July 31, 2024).

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1 place to sleep . . . for staffers . . . when campaigning in that part of the district.”⁵ The Response also
2 states that the rent for the Amish Country Inn will be “paid from personal funds” moving forward.⁶
3 The Committee has reported no additional payments to White Pillars.⁷

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

⁵ *Id.* at 1-3.

⁶ *Id.* at 2.

⁷ White Pillars Disbursements.

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

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1 the date the certification of this vote is signed (or on the next business day after the 30th day, if the
2 30th day falls on a weekend or holiday) as to all Respondents and send the appropriate letters.

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Lisa J. Stevenson
Acting General Counsel

5 January 22, 2025

6 Date

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BY:

Claudio J. Pavia

Deputy Associate General Counsel

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Wanda D. Brown

Wanda Brown

Assistant General Counsel

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