



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

**VIA UPS SIGNATURE REQUESTED**

James P. Curran  
Counsel to NYRSC  
315 State Street  
Albany, NY 12210

March 12, 2025

RE: MUR 8283

Dear Mr. Curran:

On February 5, 2025, the Federal Election Commission reviewed the allegations in your Complaint received July 5, 2024, and based on the information provided therein and information provided by the respondents, determined to exercise its prosecutorial discretion to dismiss the allegations contained in the Complaint. Accordingly, the Commission closed the file in this matter.

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). Enclosed is a copy of the General Counsel's Report, which more fully explains the Commission's decision.

The Federal Election Campaign Act of 1971, as amended, allows a complainant to seek judicial review of the Commission's dismissal of this action. *See* 52 U.S.C. § 30109(a)(8). 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”).<sup>1</sup> 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.<sup>2</sup> The Complaint alleges that these payments were for  
18 Collins’s personal residence.<sup>3</sup>

19 Collins and the Committee deny the allegations.<sup>4</sup> 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

<sup>1</sup> Compl. at 1-2 (July 5, 2024).

<sup>2</sup> *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](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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EPS Dismissal Report

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

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.<sup>8</sup> We also recommend that the Commission close the file effective 30 days from

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<sup>5</sup> *Id.* at 1-3.

<sup>6</sup> *Id.* at 2.

<sup>7</sup> White Pillars Disbursements.

<sup>8</sup> *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

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Wanda Brown

## Assistant General Counsel

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Justine A. di Giovanni

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Attorney