



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

**VIA ELECTRONIC MAIL**

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March 28, 2025

RE: [REDACTED]  
MUR 8303

Dear Messrs. Wilson and Morrison, and Ms. Sharma:

On August 20, 2024, the Federal Election Commission notified your client, Friends of Sherrod Brown and Judith Zamore in her official capacity as treasurer, of information obtained in the normal course of carrying out the Commission's supervisory responsibilities indicating that your client may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). On August 22, 2024, the Commission also notified your client of a Complaint alleging violations of certain sections of the Act. On February 25, 2025, based on the information provided in the [REDACTED] Complaint and information provided by your client, the Commission determined to exercise its prosecutorial discretion to [REDACTED] [REDACTED] dismiss the allegations contained in the Complaint in MUR 8303. Accordingly, the Commission closed its files in these matters. 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 MUR 8303 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**

**Respondent:** Friends of Sherrod Brown and  
Judith Zamore in her official  
capacity as treasurer

**Receipt Dates:** Aug. 20, 2024 (MUR 8303)

**Response Date:**

**Alleged Statutory and  
Regulatory Violation:** 52 U.S.C. § 30122  
11 C.F.R. § 110.4(b)

The Complaint in MUR 8303

allege that an unknown person made, and Friends of Sherrod Brown and Judith Zamore in her official capacity as treasurer (the “Committee”) knowingly accepted, a contribution in the name of another.<sup>1</sup> The Complaint make this allegation as to two contributions the Committee reported as made by Carol Ann Baker aggregating \$350 in May 2024, stating that these contributions cannot have been made by that individual because Baker died in December 2023.<sup>2</sup>

<sup>1</sup> Compl. at 1, MUR 8303 (Aug. 20, 2024) [hereinafter MUR 8303 Compl.].

<sup>2</sup> MUR 8303 Compl. at 1.

[REDACTED] MUR 8303 (Friends of Sherrod Brown)

EPS Dismissal Report

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1 [REDACTED]  
2 [REDACTED]  
3 Based on its experience and expertise, the Commission has established an Enforcement  
4 Priority System using formal, pre-determined scoring criteria to allocate agency resources and assess  
5 whether matters warrant further administrative enforcement proceedings. These criteria include  
6 (1) the gravity of the alleged violation, taking into account both the type of activity and the amount  
7 in violation; (2) the apparent impact the alleged violation may have had on the electoral process;  
8 (3) the complexity of the legal issues raised in the matter; and (4) recent trends in potential violations  
9 and other developments in the law. This matter is rated as low priority for Commission action after  
10 application of these pre-established criteria. Given that low rating, the apparent low dollar amount  
11 involved, and the Committee's amendment of its 2024 July Quarterly Report, we recommend that  
12 the Commission [REDACTED] dismiss the Complaint in MUR 8303  
13 consistent with the Commission's prosecutorial discretion to determine the proper ordering of its  
14 priorities and use of agency resources.<sup>6</sup> We also recommend that the Commission close the file  
15 effective 30 days from the date the certification of this vote is signed (or on the next business day

<sup>6</sup> *Heckler v. Chaney*, 470 U.S. 821, 831-32 (1985).

██████ MUR 8303 (Friends of Sherrod Brown)  
EPS Dismissal Report  
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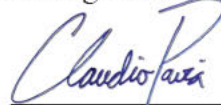
1 after the 30th day, if the 30th day falls on a weekend or holiday) as to all Respondents and send the  
2 appropriate letters.

3 Lisa J. Stevenson  
4 Acting General Counsel

5 January 28, 2025

6 Date

BY:



Claudio J. Pavia

Deputy Associate General Counsel



Wanda Brown

Assistant General Counsel

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Justine A. di Giovanni

Attorney