



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

May 29, 2025

**VIA EMAIL**

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[awoodson@wiley.law](mailto:awoodson@wiley.law)

Caleb P. Burns, Esq.

Andrew G. Woodson, Esq.

Wiley Rein LLP

2050 M Street NW

Washington, DC 20036

RE: MUR 8316  
Microsoft Corporation Stakeholders  
Voluntary PAC – MSVPAC and  
Frank Cavaliere in his official  
capacity as treasurer

Dear Messrs. Burns and Woodson:

On September 24, 2024, the Federal Election Commission notified your client, Microsoft Corporation Stakeholders Voluntary PAC – MSVPAC and Frank Cavaliere in his official capacity as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. 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 respondents, the Commission, on April 29, 2025, voted to dismiss this matter effective May 29, 2025. A copy of the General Counsel's Report, which more fully explains the Commission's decision, is enclosed for your information.

Documents related to the case 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).

If you have any questions, please contact Camilla Jackson Jones, the attorney assigned to this matter, at (202) 694-1507 or [cjacksonjones@fec.gov](mailto:cjacksonjones@fec.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "A.B.R.", with a stylized flourish at the end.

Anne B. Robinson  
Assistant General Counsel

**BEFORE THE FEDERAL ELECTION COMMISSION**

**ENFORCEMENT PRIORITY SYSTEM**

**DISMISSAL REPORT**

**MUR:** 8316

**Respondents:** Terri Sewell for Congress and Lindsay Angerholzer in her official capacity as treasurer  
Microsoft Corporation Stakeholders Voluntary PAC – MSVPAC and Frank Cavaliere in his official capacity as treasurer  
Google LLC NetPAC and Anne Wall in her official capacity as treasurer  
AT&T Inc. Employee Federal Political Action Committee and George B. Goeke in his official capacity as treasurer  
Amazon.com Services LLC Separate Segregated Fund and Brian Huseman in his official capacity as treasurer

**Complaint Receipt Date:** September 17, 2024

**Response Date:** October 10, 2024

**EPS Rating:** 15

**Alleged Statutory and  
Regulatory Violations:**

52 U.S.C. §§ 30104(b), 30118(a)  
11 C.F.R. §§ 104.3, 110.11, 114.5

The Complaint alleges that Terri Sewell for Congress and Lindsay Angerholzer in her official capacity as treasurer (the “Sewell Committee”) violated the Federal Election Campaign Act of 1971, as amended (the “Act”), by inaccurately reporting a \$25,000 disbursement to American Airlines for “polling.”<sup>1</sup> The Complaint also alleges that the Sewell Committee, a candidate committee, violated the Act by making \$1,591.80 in contributions to four separate segregated funds: \$24.00 to Microsoft Corporation Stakeholders Voluntary PAC – MSVPAC

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<sup>1</sup> Compl. at 1 (Sept. 17, 2024); *see also* Terri Sewell for Congress, 2022 Post General Election Report at 79, (Dec. 8, 2022), <https://docquery.fec.gov/pdf/927/202212089547794927/202212089547794927.pdf>.

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1 and Frank Cavaliere in his official capacity as treasurer (“MSVPAC”); \$333.53 to Google LLC  
 2 NetPAC and Anne Wall in her official capacity as treasurer (“NetPAC”), \$240.75 to AT&T Inc.  
 3 Employee Federal Political Action Committee and George B. Goeke in his official capacity as  
 4 treasurer (“AT&T PAC”); and \$993.52 to Amazon.com Services LLC Separate Segregated Fund  
 5 and Brian Huseman in his official capacity as treasurer (“Amazon PAC”).<sup>2</sup> Finally, the  
 6 Complaint alleges that the Sewell Committee failed to include adequate disclaimers on the  
 7 following communications: (1) the campaign website which states “Paid for by Sewell for  
 8 Congress” instead of “Paid for by Terri Sewell for Congress” and is not enclosed in a box; (2)  
 9 billboards which state “Paid For By Terri Sewell for Congress” but did not include a box; and (3)  
 10 social media posts which state “Sewell for Congress” instead of “Terri Sewell for Congress.”<sup>3</sup>

11 First, the Sewell Committee admits that it misreported the \$25,000 disbursement which  
 12 was for polling but made to a different payee; the Committee contends this was due to a database  
 13 error and that it amended the disclosure report.<sup>4</sup> Second, the Sewell Committee, MSVPAC,  
 14 NetPAC, AT&T PAC, and Amazon PAC each submitted separate Responses explaining that the  
 15 Sewell Committee mistakenly reported disbursements to separate segregated funds whereas it  
 16 actually made disbursements to the corporations themselves for operating expenditures.<sup>5</sup> The

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<sup>2</sup> Compl. at 1-2; *see also* Ex. B (Terri Sewell for Congress, 2024 July Quarterly Report at 197-199, 204, 208, 219, 227, 240-241, 266, 295-296, 307, 312 (July, 15, 2024), <https://docquery.fec.gov/pdf/211/202407159660066211/202407159660066211.pdf>).

<sup>3</sup> Compl. at 2; Ex. C, D, and E.

<sup>4</sup> Sewell Committee Resp. at 1 (Oct. 10, 2024); *see* Terri Sewell for Congress, Amended 2022 Post-General Report at 70-71, 73-76 (Oct. 9, 2024), <https://docquery.fec.gov/pdf/010/202410099684835010/202410099684835010.pdf>.

<sup>5</sup> Sewell Committee Resp. at 2-3; MSVPAC Resp. at 1 (Oct. 10, 2024); NetPAC Resp. at 1 (Oct. 10, 2024); AT&T PAC Resp. at 1 (Oct. 10, 2024); Amazon PAC Resp. at 1 (Oct. 10, 2024).

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Sewell Committee amended its report to correct the payees.<sup>6</sup> Finally, the Sewell Committee argues that the failure to include the candidate's first name "Terri" in disclaimers or to place the disclaimers inside a box are minor, technical omissions and that the identity of the communications' sponsor was sufficiently clear.<sup>7</sup>

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 trends in potential violations and other developments in the law. This matter is rated as low priority for Commission action after application of these pre-established criteria. Given that low rating, apparent low dollar amount at issue, the Sewell Committee's amended disclosure reports, and the unlikelihood that the general public would have been confused as to whether the Sewell Committee paid for and Sewell authorized the communications at issue, we recommend that the Commission dismiss the Complaint, consistent with the Commission's prosecutorial discretion to determine the proper ordering of its priorities and use of agency resources.<sup>8</sup> We also recommend that the Commission close the file effective 30 days after the date the certification of this vote is

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<sup>6</sup> See Terri Sewell for Congress, Amended 2024 July Quarterly Report at 197-199, 205, 208, 220, 229, 242-243, 269 298-299, 310, 315-316 (Oct. 9, 2024), <https://docquery.fec.gov/pdf/576/202410099684836576/202410099684836576.pdf>. The Sewell Committee also states that it is working with the external firm that prepares and files its reports to strengthen the review procedures for reports before filing, so that similar errors can be identified and corrected before future reports are submitted. Sewell Committee Resp. at 3.

<sup>7</sup> Sewell Committee Resp. at 3-4.

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

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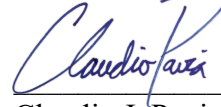
signed (or on the next business day after the 30th day, if the 30th day falls on a weekend or holiday) and send the appropriate letters.

April 15, 2025

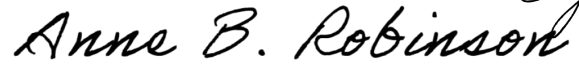
Date

Lisa J. Stevenson  
Acting General Counsel

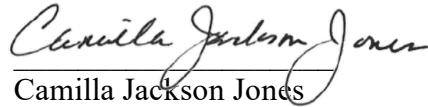
BY:



Claudio J. Pavia  
Deputy Associate General Counsel



Anne B. Robinson  
Assistant General Counsel



Camilla Jackson Jones  
Attorney