FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

May 29, 2025

VIA EMAIL
elama@politicomlaw.com
Erin Lama, Esq.
Politicom Law LLP
28 Liberty Ship Way, Suite 2815
Sausalito, CA 94965

RE: MUR 8316
Google LLC NetPAC and Anne Wall in her official capacity as treasurer

Dear Ms. Lama:

On September 24, 2024, the Federal Election Commission notified your client, Google LLC NetPAC and Anne Wall in her 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.

Sincerely,

Anne B. Robinson
Assistant General Counsel

1 **BEFORE THE FEDERAL ELECTION COMMISSION**

2 **ENFORCEMENT PRIORITY SYSTEM**
3 **DISMISSAL REPORT**

4 **MUR:** 8316 **Respondents**: Terri Sewell for Congress and Lindsay
5 Angerholzer in her official capacity as
6 treasurer
7 Microsoft Corporation Stakeholders
8 Voluntary PAC – MSVPAC and
9 Frank Cavaliere in his official
10 capacity as treasurer
11 Google LLC NetPAC and Anne Wall in
12 her official capacity as treasurer
13 AT&T Inc. Employee Federal Political
14 Action Committee and George B.
15 Goeke in his official capacity as
16 treasurer
17 Amazon.com Services LLC Separate
18 Segregated Fund and Brian Huseman
19 in his official capacity as treasurer
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21 **Complaint Receipt Date:** September 17, 2024
22 **Response Date:** October 10, 2024
23
24 **EPS Rating:** 15

25 **Alleged Statutory and**
26 **Regulatory Violations:** 52 U.S.C. §§ 30104(b), 30118(a)
27 11 C.F.R. §§ 104.3, 110.11, 114.5
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29 The Complaint alleges that Terri Sewell for Congress and Lindsay Angerholzer in her
30 official capacity as treasurer (the "Sewell Committee") violated the Federal Election Campaign
31 Act of 1971, as amended (the "Act"), by inaccurately reporting a $25,000 disbursement to
32 American Airlines for "polling."[1] The Complaint also alleges that the Sewell Committee, a
33 candidate committee, violated the Act by making $1,591.80 in contributions to four separate
34 segregated funds: $24.00 to Microsoft Corporation Stakeholders Voluntary PAC – MSVPAC

[1] 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.

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").[2] 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."[3]
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.[4] 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.[5] The

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[2] 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).

[3] Compl. at 2; Ex. C, D, and E.

[4] 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.

[5] 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).

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

5 Based on its experience and expertise, the Commission has established an Enforcement
6 Priority System using formal, pre-determined scoring criteria to allocate agency resources and
7 assess whether particular matters warrant further administrative enforcement proceedings. These
8 criteria include (1) the gravity of the alleged violation, taking into account both the type of
9 activity and the amount in violation; (2) the apparent impact the alleged violation may have had
10 on the electoral process; (3) the complexity of the legal issues raised in the matter; and (4) recent
11 trends in potential violations and other developments in the law. This matter is rated as low
12 priority for Commission action after application of these pre-established criteria. Given that low
13 rating, apparent low dollar amount at issue, the Sewell Committee's amended disclosure reports,
14 and the unlikeliness that the general public would have been confused as to whether the Sewell
15 Committee paid for and Sewell authorized the communications at issue, we recommend that the
16 Commission dismiss the Complaint, consistent with the Commission's prosecutorial discretion to
17 determine the proper ordering of its priorities and use of agency resources.[8] We also recommend
18 that the Commission close the file effective 30 days after the date the certification of this vote is

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[6] *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.

[7] Sewell Committee Resp. at 3-4.

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

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.

Lisa J. Stevenson
Acting General Counsel

April 15, 2025
Date

BY: Claudio Pavia
Claudio J. Pavia
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Anne B. Robinson
Anne B. Robinson
Assistant General Counsel

Camilla Jackson Jones
Camilla Jackson Jones
Attorney