



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

April 4, 2025

**VIA ELECTRONIC MAIL**

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Robert F. Kennedy, Jr.

[REDACTED]

Los Angeles, CA 90049

RE: MUR 8323  
Team Kennedy, et al.

Dear Mr. Kennedy,

On October 9, 2024, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint and information supplied in response, on March 5, 2025, the Commission voted to dismiss this matter and close the file effective April 4, 2025. 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).

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:** 8323

**Respondents:** Team Kennedy and Ellie Cox in her  
official capacity as treasurer  
IMPG Advocates, Inc.  
Paul A. Rossi

**Complaint Receipt Date:** October 2, 2024

**Response Dates:** October 24, 2024; December 4, 2024



**Alleged Statutory and  
Regulatory Violations:**

52 U.S.C. §§ 30104; 30116(a)(1)(A), (f); 30118(a)  
11 C.F.R. §§ 104.3; 114.2

The Complaint alleges that Team Kennedy and Ellie Cox in her official capacity as treasurer, the principal campaign committee for 2024 presidential candidate Robert F. Kennedy, Jr., (the “Committee”),<sup>1</sup> violated the Federal Election Campaign Act of 1971, as amended (the “Act”), by knowingly accepting and failing to report excessive and/or prohibited corporate in-kind contributions in the form of unpaid legal and communication services from Paul A. Rossi and IMPG Advocates, Inc. (“IMPG”) or else, if these services were not in-kind contributions, failing to report the debt incurred by not paying for those services.<sup>2</sup>

In response, the Committee denies the allegations and states that because Rossi never billed the campaign for his services (despite the Committee entering a payment agreement with Rossi and reaching out to him several times to encourage him to send a bill),<sup>3</sup> his services fall

<sup>1</sup> Team Kennedy, Amended Statement of Organization at 1-2 (July 23, 2024), <https://docquery.fec.gov/pdf/392/202407239665718392/202407239665718392.pdf>.

<sup>2</sup> Compl. at 2-3, 11-15 (Oct. 2, 2024).

<sup>3</sup> Team Kennedy Resp., Ex. 3 ¶¶ 7-8 (Declaration of Robyn Ross) (Oct. 24, 2024).

1 within the volunteer services exemption, and therefore his services do not constitute a  
2 contribution.<sup>4</sup> In support, the Committee argues that its agreement with Rossi provides that  
3 Rossi can volunteer without the value of the work being considered a donation.<sup>5</sup> The Committee  
4 also asserts that because Rossi's services were for ballot access litigation, they were not provided  
5 for the purpose of influencing a federal election and for that reason do not constitute a  
6 contribution within the meaning of the Act.<sup>6</sup> Finally, the Committee argues that because it  
7 contracted with Rossi individually rather IMPG, even if the legal services did amount to a  
8 contribution, it would not have knowingly accepted a corporate contribution or loan.<sup>7</sup>

9 In a separate response, Rossi and IMPG indicate that Rossi now intends to remit an  
10 invoice to the Committee for his services at the conclusion of the representation in accordance  
11 with his normal billing procedure.<sup>8</sup> Rossi argues that because counsel can volunteer their time to  
12 presidential candidates, he was not required to remit an invoice for payment to the Committee at  
13 all, and the Committee was not required to report a debt until receiving an invoice.<sup>9</sup>

14 Based on its experience and expertise, the Commission has established an Enforcement  
15 Priority System using formal, pre-determined scoring criteria to allocate agency resources and  
16 assess whether particular matters warrant further administrative enforcement proceedings. These  
17 criteria include (1) the gravity of the alleged violation, taking into account both the type of  
18 activity and the amount in violation; (2) the apparent impact the alleged violation may have had

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<sup>4</sup> *Id.* at 2-3.

<sup>5</sup> *Id.* at 2; *id.*, Ex. 2 at 10 (Team Kennedy Consultant Agreement).

<sup>6</sup> *Id.* at 3-4.

<sup>7</sup> *Id.* at 4-5.

<sup>8</sup> Rossi Resp. at 1-2, ¶¶ 8-9 (Dec. 4, 2024). Neither the Complaint nor the Responses provide adequate information to determine the value of the legal and other services that Rossi provided to the Committee.

<sup>9</sup> *Id.* ¶¶ 10-12.

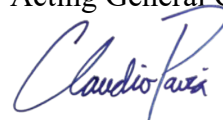
1 on the electoral process; (3) the complexity of the legal issues raised in the matter; and (4) recent  
2 trends in potential violations and other developments in the law. This matter is rated as a low  
3 priority for Commission action after application of these pre-established criteria. Given that low  
4 rating, we recommend that the Commission dismiss the Complaint consistent with the  
5 Commission's prosecutorial discretion to determine the proper ordering of its priorities and use  
6 of agency resources.<sup>10</sup> We also recommend that the Commission close the file effective 30 days  
7 from the date the certification of this vote is signed (or on the next business day after the 30th  
8 day, if the 30th day falls on a weekend or holiday), and send the appropriate letters.

9  
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12  
13 February 25, 2025

14 Date

Lisa J. Stevenson  
Acting General Counsel

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BY:



Claudio J. Pavia  
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Mark Shonkwiler  
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Kenneth C. Daines  
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<sup>10</sup> See *Heckler v. Chaney*, 470 U.S. 821, 831-32 (1985).