



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

March 17, 2025

VIA UPS DELIVERY AND ELECTRONIC MAIL

zuhdi@zliberty.com

M. Zuhdi Jasser, MD

[REDACTED]
Scottsdale, AZ 85259

RE: MUR 8337
Dave Giles for Congress, *et al.*

Dear Dr. Jasser:

This is in reference to the complaint filed with the Federal Election Commission on October 25, 2024, concerning Dave Giles for Congress, *et al.* Based on that complaint, and after considering the circumstances of this matter and information provided in response to the complaint, the Commission determined to dismiss this matter and close the file effective March 17, 2025.

The General Counsel's Report, which more fully explains the basis for the Commission's decision, is enclosed. 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).

The Federal Election Campaign Act of 1971, as amended, allows a complainant to seek judicial review of the Commission's dismissal of this action within 60 days of the dismissal, which became effective today. *See* 52 U.S.C. § 30109(a)(8).

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 8337

Respondents: Dave Giles for Congress and Douglas Wolfe in his official capacity as treasurer
David V. Giles

Complaint Receipt Date: Oct. 25, 2024

Response Dates: Nov. 4, 2024; Nov. 12, 2024

[REDACTED]

**Alleged Statutory/
Regulatory Violations:**

52 U.S.C. § 30104(b)
11 C.F.R. §§ 104.3(a)(4)

The Complaint alleges that Dave Giles for Congress and Douglas Wolfe in his official capacity as treasurer (the “Committee”), the principal campaign committee of David V. Giles,¹ a 2024 candidate in Arizona’s 4th Congressional District,² did not disclose complete identifying information for several contributors and did not make best efforts to obtain, maintain, and submit the same, totaling \$8,469, in violation of the Federal Election Campaign Act of 1971, as amended (the “Act”).³ The Complaint characterizes 134 contributions from contributors with the same first and last name and an address outside of Arizona as “suspiciously irregular” and “illegitimate,” alleging that the Committee’s disclosures “appear to be incomplete” and the contributors’ names appear to be “inconsistently spelled.”⁴

¹ Dave Giles for Congress, Amended Statement of Organization at 2 (Dec. 12, 2017), <https://docquery.fec.gov/pdf/767/201712129089180767/201712129089180767.pdf>.

² David V. Giles, Amended Statement of Candidacy (Jan. 16, 2023), <https://docquery.fec.gov/pdf/123/202301169574765123/202301169574765123.pdf>.

³ Compl. at 1-2, 5-6, 13, 19, 23, 25, 26, 29, 33 (Oct. 25, 2024).

⁴ *Id.* at 1. All of the contributions by contributors with the same first and last name referenced in the Complaint were disclosed in the Committee’s 2024 July Quarterly Report. Dave Giles for Congress, 2024 July Quarterly Report at 5-20, 28-34, 53, 140-149, 161-162, 174-175, 266-280, 288-297, 434-439 (July 15, 2024), <https://docquery.fec.gov/pdf/577/202407159653320577/202407159653320577.pdf>. The Committee submitted its 2024 July Quarterly Report on

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In Response, Giles and the Committee both state that the Committee’s disclosure reports contain contributor information “extracted from credit card processing agents” and state that the Committee “reported the contributions as provided by the processing agents.”⁵ The Committee filed a Termination Report which was accepted as a termination prior to the submission of the Complaint.⁶

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, and apparent low dollar amount 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.⁷ We also recommend that the Commission close the file

July 15, 2024. Later the same day the Committee amended its 2024 July Quarterly Report. Dave Giles for Congress, Amended 2024 July Quarterly Report (July 15, 2024), <https://docquery.fec.gov/pdf/464/202407159653406464/202407159653406464.pdf>. The contributions by contributors with the same first and last name referenced in the Complaint do not appear on the amended disclosure report.

⁵ Giles Resp. at 1 (Nov. 4, 2024); Committee Resp. at 1 (Nov. 12, 2024).

⁶ Dave Giles for Congress, Termination Report at 1 (Oct. 1, 2024), <https://docquery.fec.gov/pdf/220/202410019684770220/202410019684770220.pdf>; Dave Giles for Congress, Termination Approval 2024 at 1 (Oct. 3, 2024), <https://docquery.fec.gov/pdf/819/202410030300222819/202410030300222819.pdf>.

⁷ *Heckler v. Chaney*, 470 U.S. 821, 831-32 (1985).

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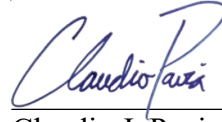
effective 30 days from the date the certification of this vote is signed (or on the next business day after the 30th day, if the 30th day falls on a weekend or holiday) and send the appropriate letters.

January 31, 2025

Date

Lisa J. Stevenson
Acting General Counsel

BY:



Claudio J. Pavia
Deputy Associate General Counsel



Wanda D. Brown
Assistant General Counsel



Gordon King
Attorney