



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

April 14, 2025

**VIA ELECTRONIC MAIL**

[agaona@cblawyers.com](mailto:agaona@cblawyers.com)

D. Andrew Gaona, Esquire  
Coppersmith Brockelman  
2800 N. Central Avenue, Suite 1900  
Phoenix, AZ 85004

RE: MUR 8344  
Arizona Republicans Who Believe In Treating Others With Respect

Dear Mr. Gaona:

On November 13, 2024, the Federal Election Commission notified your client Arizona Republicans Who Believe In Treating Others With Respect (the "Committee,"), and Jeff Webster in his official capacity as treasurer, 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 the Committee at that time.

Upon further review of the allegations contained in the complaint, and information supplied in response, the Commission, on March 12, 2025, voted to dismiss this matter and close the file effective April 14, 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

1 **BEFORE THE FEDERAL ELECTION COMMISSION**  
2  
3 **ENFORCEMENT PRIORITY SYSTEM**  
4 **DISMISSAL REPORT**  
5

6 **MUR 8344**

**Respondent:** Arizona Republicans Who Believe In  
Treating Others With Respect and  
John Webster in his official capacity  
as treasurer

10  
11 **Complaint Receipt Date:** Nov. 6, 2024

12 **Response Date:** Dec. 12, 2024



15  
16 **Alleged Statutory/**

17 **Regulatory Violations:**

52 U.S.C. § 30120(a)  
11 C.F.R. § 110.11(c)

18  
19 The Complaint alleges that Arizona Republicans Who Believe In Treating Others With  
20 Respect and John Webster in his official capacity as treasurer (the “Committee”), an independent  
21 expenditure-only political committee,<sup>1</sup> paid to run an advertising campaign on billboards in the  
22 Phoenix, Arizona metropolitan area which contained express advocacy for a 2024 candidate for  
23 president, and which lacked adequate disclaimers, in violation of the Federal Election Campaign  
24 Act of 1971, as amended.<sup>2</sup> The Complaint argues that the disclaimers displayed on the billboards  
25 were unreadable “when accounting for digital pixelation and drivers’ inability to see the disclaimer  
26 at high rates of speed.”<sup>3</sup>

27 In Response, the Committee argues that the disclaimers as originally displayed on the  
28 billboards in question were adequate, that the Complainant had no apparent difficulty discovering  
29 that the Committee paid for the billboards, and that once the Committee was made aware of the

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<sup>1</sup> Arizona Republicans Who Believe In Treating Others With Respect, Amended Statement of Organization at 2 (July 10, 2024), <https://docquery.fec.gov/pdf/667/202407109652762667/202407109652762667.pdf>.

<sup>2</sup> Compl. at 4 (Nov. 6, 2024).

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

1 Complaint, prior to it being filed with the Commission, the Committee worked with its vendor to  
2 nonetheless increase the size of the disclaimer on the billboards.<sup>4</sup> The Committee therefore requests  
3 that the Commission dismiss the Complaint.<sup>5</sup>

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

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<sup>4</sup> Committee Resp. at 2 (Dec. 12, 2024). The Committee provides invoices to show that it paid its vendor \$116,117.18 to run the advertisements on the billboards. *Id.* at 1; *id.* Ex. 1 (vendor invoices).

<sup>5</sup> *Id.* at 3.

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

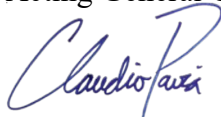
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February 27, 2025  

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Date

Lisa J. Stevenson  
Acting General Counsel

BY:   

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Claudio J. Pavia  
Deputy Associate General Counsel

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Wanda D. Brown  
Assistant General Counsel

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Gordon King  
Attorney