

1 Committee in error.⁵ The Commission approved the Committees termination request in December
2 of 2022, approximately two years before the Complaint was filed.⁶

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

⁵ Resp. at 1 (Dec. 12, 2024).

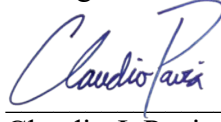
⁶ Culp for Congress, Termination Approval 2022 at 1 (Dec. 6, 2022), <https://docquery.fec.gov/pdf/623/202212060300162623/202212060300162623.pdf>.

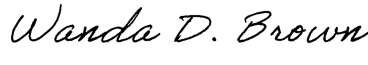
⁷ *Heckler v. Chaney*, 470 U.S. 821, 831-32 (1985).

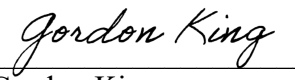
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February 28, 2025
Date

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