



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

July 30, 2025

MEMORANDUM

TO: The Commission

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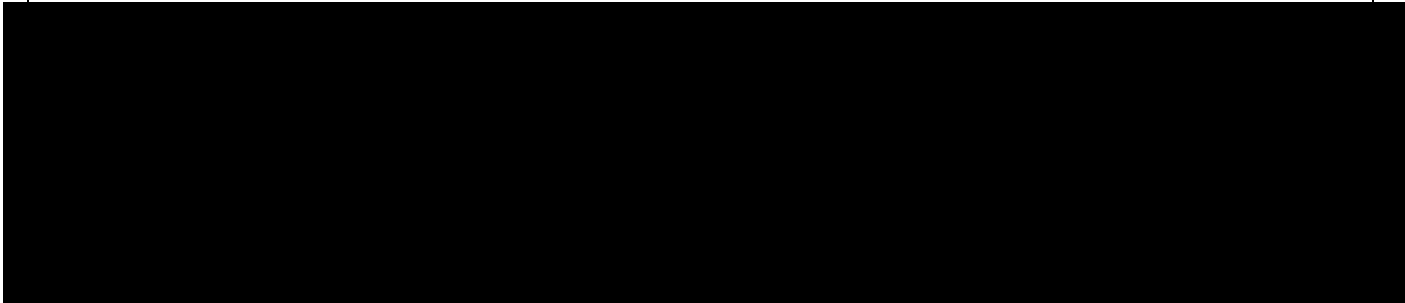
SUBJECT: Status of Enforcement
Third Quarter 2025 (4/1/2025 to 6/30/2025)

To assist the Commission and the Office of General Counsel in assessing the current productivity of the Commission's enforcement program, we submit the Status of Enforcement for the third quarter (4/1/2025 to 6/30/2025) of 2025. The tables that follow provide information to assist agency management in its review of the enforcement program.

At the close of the quarter, the total enforcement caseload was 154 matters — 129 active and 25 inactive. The Enforcement Division circulated First General Counsel's Reports ("FGCRs") for 49 matters in an average of 115 days, meeting the internal circulation goal 82% of the time. The Enforcement Division's Office of Complaints Examination & Legal Administration ("CELA") circulated EPS reports for seven matters in an average of eight days from assignment. No new investigations commenced, and two matters were pending in the investigation stage at the close of the quarter. The Commission closed 52 matters in the quarter in an average of 483 days, thereby meeting its goal of closing matters within 15 months in 58% of these matters. The Commission assessed \$274,000 in civil penalties during the quarter. Finally, attorney staffing in the Enforcement Division at the close of the quarter stood at 18 staff attorneys, five team leaders (one in CELA), and two deputies.

Table 1. Caseload

<u>CASELOAD</u>	Inactive	Active	Total
Number of Cases	25	129	154
Number of Reports Pending w/Commission*	N/A	63	63
FGCR	N/A	108	108
EPS	N/A	6	6
Investigation	N/A	4	4
Pre-Probable Cause Conciliation	N/A	9	9
Probable Cause/PC Brief	N/A	2	2



*As of 7/29/2025

Table 2. CELA Statistics

<u>CELA INITIAL CASE PROCESSING</u>	Current Quarter	YTD	2024	2023	2022	2021	2020	2019
Number of Cases Received	20	80	165	122	154	128	176	149
Number of Cases Rated	18	106	131	129	83	152	135	144
Average Days from Last Response to Rating (Goal: 30 days)	1	12	7	16	14	15	11	11
Ratings Meeting Goal	94% [17/18]	76% [81/108]	90% [118/131]	81% [104/129]	79% [85/108]	77% [117/152]	84% [114/135]	75% [108/144]
Number of Cases Activated	27	99	77	75	74	101	109	112
Average Days from Last Response to Activation (Goal: 90 Days)	40	132	108	86	99	77	39	47
Activations Meeting Goal	74% [20/27]	46% [46/99]	58% [45/77]	64% [48/75]	70% [52/74]	65% [66/101]	92% [100/109]	72% [81/112]
Number of Cases Dismissed Via EPS	20	68	40	26	20	42	18	44
Number of Cases Circulated Via EPS	7	73	39	15	27	34	24	49
Average Days from Assignment to Circulation of EPS Report	8	20	71	27	118	116	58	50
Number of Cases Transferred to ADRO	0	1	4	0	0	6	11	7
Average Days from Rating to Transfer to ADRO (Goal: 60 Days)	N/A	67	158	N/A	N/A	60	32	36
ADRO Transfers Meeting Goal	0% [0/0]	0% [0/1]	50% [2/4]	N/A [0/0]	N/A [0/0]	67% [4/6]	82% [9/11]	71% [5/7]

Table 3. Enforcement Statistics

<u>ENFORCEMENT PROCESS</u>	Current Quarter	YTD	2024	2023	2022	2021	2020	2019
First General Counsel’s Reports (“FGCRs”)								
Cases with FGCRs Circulated	49	103	82	69	88	128	103	143
Average Days from Activation to Circulation	115	132	164	169	231	165	153	177
FGCRs Meeting Established Time Goal	82% [40/49]	76% [78/103]	54% [44/82]	70% [48/69]	68% [60/88]	73% [93/128]	68% [70/103]	68% [97/143]
Pre-Probable Cause Conciliation (“PPCC”)								
Negotiations Commenced	2	27	78	35	114	103	2	79
Negotiations Concluded	12	48	51	89	92	49	12	84
Average Days in PPCC (Goal: 60 Days)	151	126	111	179	119	122	221	127
Number of Negotiations Meeting Goal	0%	50%	33%	19%	22%	65%	0%	30%
Investigations								
Investigations Commenced	0	0	4	2	7	12	1	31
Investigations Closed	0	4	1	6	9	22	8	10
Average Days in Investigation	N/A	560	932	437	862	660	549	634
Active Investigations at Close of Quarter	2							
Probable Cause								
Hearing Requests/Number Granted	0/0	0/0	0/0	1/1	2/2	1/1	1/1	1/1
Cases with Probable Cause Findings	0	0	2	1	2	2	0	0
Negotiated PC Settlements Approved	0	0	2	0	3	1	0	0
Average Days in PC Conciliation	N/A	N/A	146	N/A	841	29	N/A	N/A
Closed Cases								
Matters Closed	52	153	134	116	245	194	37	189
Matters Closed Within 15 Months	30 (58%)	93 (61%)	55 (41%)	62 (53%)	55 (34%)	66 (34%)	23 (62%)	106 (56%)
Average Days from Receipt to Closing	483	505	584	632	811	852	530	630
Civil Penalties	\$274,000.00	\$1,04500.00	\$533,399.04	\$1,482,300	\$2,062,128	\$803,878	\$702,000	\$2,123,436

Table 4. Cases Pending Without a Commission Vote for 12 Months*

Matter	Case Name	Opened	Days Received to Close of Quarter	Circulation Date	Status Letter Date
1				06/30/25	11/14/24
2					N/A
3				(08/31/25)	N/A
4				06/05/25	05/06/25
5				(08/29/25)	01/15/25
6				(08/29/25)	04/15/25
7				06/05/25	06/17/25
8				06/27/25	02/11/25
9				(08/29/25)	04/03/25
10				(08/29/25)	05/01/25
11				(08/29/25)	05/01/25
12				05/09/25	07/24/25
13				04/07/25	07/24/25
14				(08/31/25)	07/22/24
15				(08/31/25)	07/30/24
16				(08/31/25)	07/30/24
17				(8/29/25)	10/23/24
18				05/14/25	10/23/24
19				05/29/25	10/23/24
20				(08/31/25)	09/27/24
21				07/29/25	07/30/25
22				07/18/25	04/30/25
23				02/27/25	04/03/25
24				12/19/24	02/12/25
25				05/07/25	07/24/25
26				01/27/25	03/27/25
27				05/02/25	03/28/25
28				(08/31/25)	N/A
29				02/14/25	04/08/25
30				06/26/25	06/06/25
31				05/30/25	05/01/25

Matter	Case Name	Opened	Days Received to Close of Quarter	Circulation Date	Status Letter Date
32				04/09/25	03/28/25
33				N/A	N/A
34				02/10/25	03/27/25
35				05/07/25	07/24/25
36				(09/03/25)	07/30/25
37				03/31/25	05/14/25
38				06/27/25	07/29/25
39				01/10/25	07/29/25
40				01/13/25	07/29/25
41				06/26/25	07/30/25
42				02/18/25	07/30/25
43				(09/19/25)	07/29/25
44				(09/19/25)	07/29/25
45				05/06/25	07/30/25
46				05/28/25	07/30/25
47				06/27/25	07/28/25
48				06/25/25	07/29/25
49				(09/19/25)	07/29/25
50				(09/19/25)	07/08/25
51				07/03/25	07/29/25
52				07/29/25	07/30/25

**A date in parenthesis is the date FGCR is expected to circulate*

Table 5. Statute of Limitations Sensitive Matters (18 Months)

	Matter	Case Name	Tolling	Opened	Earliest SOL Date	Latest SOL Date	Current Stage
1							
2							
3							
4							
5							
6							
7							
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31							

Table 6. Matters Beyond the Reason to Believe Stage

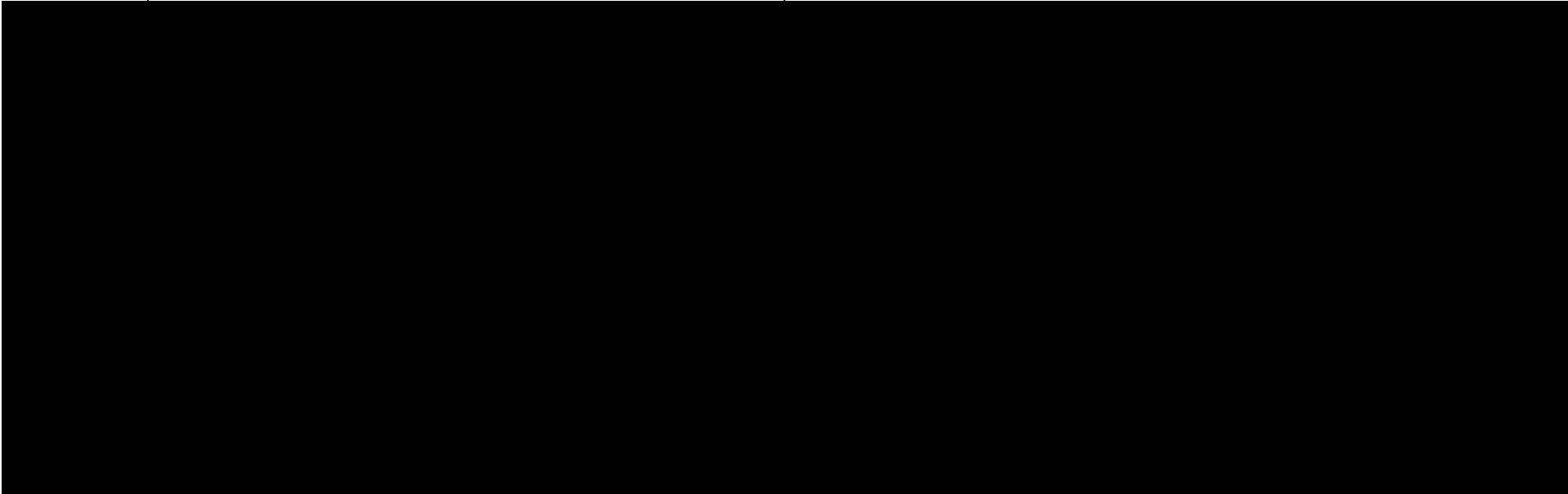
Matters	Case Name	Current Stage
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		

Table 7. First General Counsel’s Reports Pending with the Commission at the End of the Quarter

Matter	Case Name	Receipt	Assigned	Circ.	# of Days Receipt to Circ.	# of Days Assigned to Circ.	# of Days Receipt to Close of Quarter	# of Days Assigned to Close of Quarter	# of Days Circ. to Close of Quarter	Held Over	
1		08/10/23	03/11/24	12/19/24			283	690	476	193	
2		02/06/24	08/27/24	12/19/24			114	510	307	193	01/28/25; 01/30/25
3		05/07/24	10/15/24	01/13/25			90	419	258	168	
4		02/09/24	12/10/24	01/27/25			48	507	202	154	
5		03/27/24	10/30/24	02/10/25			103	460	243	140	
6		02/26/24	10/17/24	02/14/25			120	490	256	136	04/29/25; 05/01/25
7		05/21/24	09/25/25	02/18/25			-219	405	-87	132	
8		01/02/24	07/02/24	02/27/25			240	545	363	123	03/25/25; 03/27/25
9		08/21/24	12/31/24	03/24/25			83	313	181	98	04/29/25; 05/01/25
10		08/22/24	12/31/24	03/24/25			83	312	181	98	04/29/25; 05/01/25
11		10/02/24	01/16/25	03/24/25			67	271	165	98	04/29/25; 05/01/25
12		04/22/24	10/15/24	03/31/25			167	434	258	91	04/29/25; 05/01/25
13		07/10/24	01/10/25	04/03/25			83	355	171	88	
14		04/17/23	09/05/23	04/07/25			580	805	664	84	
15		03/07/24	12/11/24	04/09/25			119	480	201	82	
16		12/18/24	02/21/25	04/17/25			55	194	129	74	
17		11/27/24	02/21/25	04/17/25			55	215	129	74	
18		10/16/24	02/14/25	04/21/25			66	257	136	70	
19		08/01/24	12/31/24	04/22/25			112	333	181	69	
20		11/21/24	02/28/25	04/25/25			56	221	122	66	
21		08/07/24	12/31/24	05/01/25			121	327	181	60	
22		02/15/24	12/31/24	05/02/25			122	501	181	59	
23		06/03/24	04/18/25	05/06/25			18	392	73	55	
24		07/15/24	01/10/25	05/07/25			117	350	171	54	
25		02/07/24	01/10/25	05/07/25			117	509	171	54	
26		03/28/24	01/10/25	05/07/25			117	459	171	54	
27		09/09/24	02/11/25	05/08/25			86	294	139	53	
28		03/15/23	01/10/25	05/09/25			119	838	171	52	
29		08/23/23	02/28/25	05/14/25			75	677	122	47	

Matter	Case Name	Receipt	Assigned	Circ.	# of Days Receipt to Circ.	# of Days Assigned to Circ.	# of Days Receipt to Close of Quarter	# of Days Assigned to Close of Quarter	# of Days Circ. to Close of Quarter	Held Over
30		10/31/24	02/20/25	05/16/25		85	242	130	45	
31		03/03/25	05/15/25	05/19/25		4	119	46	42	
32		09/09/24	03/05/25	05/21/25		77	294	117	40	
33		01/23/25	05/06/25	05/22/25		16	158	55	39	
34		06/05/24	05/20/25	05/28/25		8	390	41	33	
35		08/23/23	02/28/25	05/29/25		90	677	122	32	
36		11/19/24	02/28/25	05/29/25		90	223	122	32	
37		03/04/24	03/10/25	05/30/25		81	483	112	31	
38		10/16/24	05/27/25	06/03/25		7	257	34	27	
39		01/17/23	10/29/24	06/05/25		219	895	244	25	
40		12/14/22	10/29/24	06/05/25		219	929	244	25	
41		02/18/25	03/18/25	06/16/25		90	132	104	14	
42		09/13/24	03/05/25	06/18/25		105	290	117	12	
43		10/08/24	04/16/25	06/18/25		63	265	75	12	
44		10/08/24	03/20/25	06/18/25		90	265	102	12	
45		12/12/24	04/25/25	06/24/25		60	200	66	6	
46		06/14/24	06/10/25	06/25/25		15	381	20	5	
47		09/06/24	05/02/25	06/25/25		54	297	59	5	
48		09/13/24	05/05/25	06/25/25		51	290	56	5	
49		11/15/24	05/02/25	06/25/25		54	227	59	5	
50		09/17/24	05/02/25	06/25/25		54	286	59	5	
51		10/10/24	05/05/25	06/25/25		51	263	56	5	
52		11/13/24	05/02/25	06/25/25		54	229	59	5	
53		03/27/25	05/02/25	06/25/25		54	95	59	5	
54		04/08/25	05/14/25	06/25/25		42	83	47	5	
55		04/15/25	05/02/25	06/25/25		54	76	59	5	
56		06/24/25	06/24/25	06/25/25		1	6	5	5	
57		03/04/24	03/05/25	06/26/25		113	483	117	4	

Matter	Case Name	Receipt	Assigned	Circ.	# of Days Receipt to Circ.	# of Days Assigned to Circ.	# of Days Receipt to Close of Quarter	# of Days Assigned to Close of Quarter	# of Days Circ. to Close of Quarter	Held Over
58	[REDACTED]	12/06/24	03/14/25	06/26/25	[REDACTED]	104	206	108	4	
59		05/14/24	03/27/25	06/26/25		91	412	95	4	
60		10/10/24	03/27/25	06/26/25		91	263	95	4	
61		03/06/25	04/25/25	06/27/25		63	116	66	3	
62		02/02/23	12/12/24	06/27/25		197	879	200	3	
63		05/02/24	12/31/24	06/27/25		178	424	181	3	
64		06/06/24	03/06/25	06/27/25		113	389	116	3	
65		08/24/22	02/17/23	06/30/25		864	1041	864	0	

Table 8. Foreign National Matters

Matter #	Primary Respondent	Complainant	Receipt	Assigned	Last Response	Status	To DOJ	Country	Earliest SOL
1				03/20/25					
2				02/14/25					
3				06/30/25					