



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

December 5, 2025

MEMORANDUM

TO: The Commission

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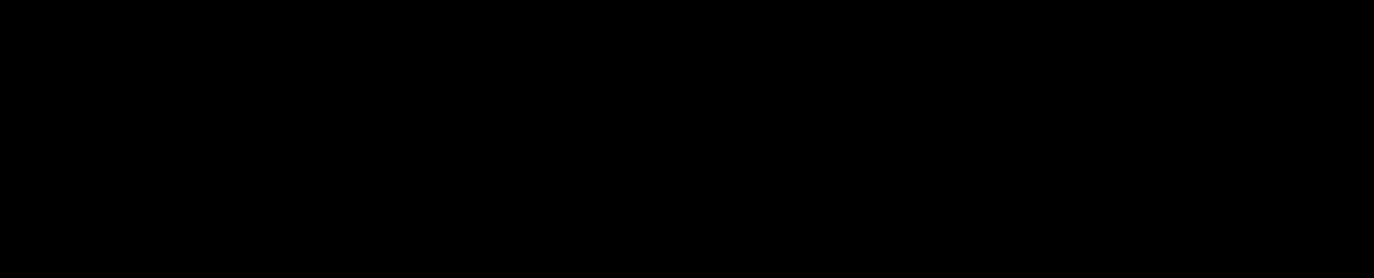
SUBJECT: Status of Enforcement
Fourth Quarter FY 2025 (7/1/2025 to 9/30/2025)

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 fourth quarter (7/1/2025 to 9/30/2025) and the end of fiscal year 2025 (10/1/2024 to 9/30/2025). 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 190 matters — 154 active and 36 inactive. During fiscal year 2025, the Enforcement Division circulated First General Counsel's Reports ("FGCRs") in 121 matters in an average of 128 days, meeting the internal circulation goal 78% of the time. The Enforcement Division's Office of Complaints Examination & Legal Administration ("CELA") circulated EPS reports for 75 matters in an average of 20 days from assignment. No new investigations commenced during the fiscal year, and two matters were pending in the investigation stage at the close of the fiscal year. The Commission closed 154 matters in the fiscal year in an average of 502 days, thereby meeting its goal of closing within 15 months in 61% of these matters. The Commission assessed \$1,045,500 in civil penalties during the fiscal year. Finally, attorney staffing in the Enforcement Division at the close of the quarter stood at 17 staff attorneys, five team leaders (one in CELA), and two deputies.

Table 1. Caseload

<u>CASELOAD</u>	Inactive	Active	Total
Number of Cases	36	154	190
Number of Reports Pending w/Commission*	0	82	82
FGCR	N/A	128	128
EPS	0	11	11
Investigation	N/A	2	2
Pre-Probable Cause Conciliation	N/A	9	9
Probable Cause/PC Brief	N/A	2	2



*As of 12/1/2025

Table 2. CELA Statistics

<u>CELA INITIAL CASE PROCESSING</u>	Current Quarter	FY 2025	2024	2023	2022	2021	2020	2019
Number of Cases Received	34	114	165	122	154	128	176	149
Number of Cases Rated	22	128	131	129	83	152	135	144
Average Days from Last Response to Rating (Goal: 30 days)	7	11	7	16	14	15	11	11
Ratings Meeting Goal	91% [20/22]	80% [103/128]	90% [118/131]	81% [104/129]	79% [85/108]	77% [117/152]	84% [114/135]	75% [108/144]
Number of Cases Activated	10	109	77	75	74	101	109	112
Average Days from Last Response to Activation (Goal: 90 Days)	14	132	108	86	99	77	39	47
Activations Meeting Goal	100% [10/10]	46% [46/109]	58% [45/77]	64% [48/75]	70% [52/74]	65% [66/101]	92% [100/109]	72% [81/112]
Number of Cases Dismissed Via EPS	0	68	40	26	20	42	18	44
Number of Cases Circulated Via EPS	2	75	39	15	27	34	24	49
Average Days from Assignment to Circulation of EPS Report	9	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	FY 2025	2024	2023	2022	2021	2020	2019
First General Counsel’s Reports (“FGCRs”)								
Cases with FGCRs Circulated	18	121	82	69	88	128	103	143
Average Days from Activation to Circulation	109	128	164	169	231	165	153	177
FGCRs Meeting Established Time Goal	89% [16/18]	78% [94/121]	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	0	27	78	35	114	103	2	79
Negotiations Concluded	2	51	51	89	92	49	12	84
Average Days in PPCC (Goal: 60 Days)	134	127	111	179	119	122	221	127
Number of Negotiations Meeting Goal	0%	47%	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	1	154	134	116	245	194	37	189
Matters Closed Within 15 Months	1 (100%)	94 (61%)	55 (41%)	62 (53%)	55 (34%)	66 (34%)	23 (62%)	106 (56%)
Average Days from Receipt to Closing	9	502	584	632	811	852	530	630
Civil Penalties	\$0	\$1,045,500	\$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	11/18/25
2				(02/12/26)	N/A
3				12/03/25	N/A
4				06/05/25	05/06/25
5				09/26/25	01/15/25
6				09/26/25	04/15/25
7				06/05/25	06/17/25
8				06/27/25	02/11/25
9				(1/30/2026)	04/03/25
10				(02/04/26)	05/01/25
11				(02/04/26)	05/01/25
12				05/09/25	07/24/25
13				04/07/25	07/24/25
14				(12/15/25)	08/08/25
15				(12/03/25)	11/24/25
16				(12/03/25)	11/24/25
17				09/24/25	10/23/24
18				05/14/25	11/24/25
19				05/29/25	11/24/25
20				(1/30/2026)	09/25/25
21				07/29/25	07/30/25
22				07/18/25	12/01/25
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				09/04/25	07/31/25
29				02/14/25	04/08/25
30				06/26/25	06/06/25

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Matter	Case Name	Opened	Days Received to Close of Quarter	Circulation Date	Status Letter Date
31				05/30/25	05/01/25
32				04/09/25	03/28/25
33				(01/13/26)	N/A
34				02/10/25	03/27/25
35				05/07/25	07/24/25
36				(12/31/25)	08/18/25
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				(01/31/26)	08/04/25
44				(01/31/26)	08/04/25
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				(01/31/26)	08/04/25
50				(01/31/26)	08/04/25
51				07/03/25	07/08/25
52				07/29/25	07/30/25
53					N/A
54				04/03/25	07/10/25
55				05/07/25	7/24/2025
56					N/A
57				07/25/25	07/30/25
58				(12/29/25)	12/5/2025
59				07/01/25	09/25/25
60				(12/31/2025)	09/23/25
61				(12/31/2025)	09/23/25

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Matter	Case Name	Opened	Days Received to Close of Quarter	Circulation Date	Status Letter Date
62				07/15/25	N/A
63				04/22/25	09/26/25
64				(12/29/25)	12/5/2025
65				05/01/25	09/12/25
66				(01/28/26)	
67				(12/31/2025)	09/23/25
68				03/24/25	08/22/25
69				03/24/25	08/22/25
70				(12/03/25)	01/18/27
71				06/25/25	N/A
72				05/21/25	11/26/2025
73				05/08/25	09/30/25
74				06/18/25	09/30/25
75				06/25/25	N/A
76				11/24/25	12/5/2025
77				(12/23/2025)	12/5/2025
78				06/25/25	N/A
79				08/14/25	08/26/25

**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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	Matter	Case Name	Tolling	Opened	Earliest SOL Date	Latest SOL Date	Current Stage
32							
33							
34							
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42							
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46							

Table 6. Matters Beyond the Reason to Believe Stage

Matters	Case Name	Current Stage
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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		02/06/24	08/27/24	12/19/24		90	511	350	260	01/28/25; 01/30/25
2		05/07/24	10/15/24	01/13/25		48	599	294	246	
3		02/09/24	12/10/24	01/27/25		103	552	335	232	
4		03/27/24	10/30/24	02/10/25		120	582	348	228	
5		02/26/24	10/17/24	02/14/25		146	497	370	224	04/29/25; 05/01/25
6		05/21/24	09/25/24	02/18/25		240	637	455	215	
7		01/02/24	07/02/24	02/27/25		83	405	273	190	03/25/25; 03/27/25
8		08/21/24	12/31/24	03/24/25		83	404	273	190	04/29/25; 05/01/25
9		08/22/24	12/31/24	03/24/25		67	363	257	190	04/29/25; 05/01/25
10		10/02/24	01/16/25	03/24/25		167	526	350	183	04/29/25; 05/01/25
11		04/22/24	10/15/24	03/31/25		83	447	263	180	04/29/25; 05/01/25
12		07/10/24	01/10/25	04/03/25		580	897	756	176	
13		04/17/23	09/05/23	04/07/25		119	572	293	174	
14		03/07/24	12/11/24	04/09/25		55	286	221	166	
15		12/18/24	02/21/25	04/17/25		55	307	221	166	
16		11/27/24	02/21/25	04/17/25		66	349	228	162	
17		10/16/24	02/14/25	04/21/25		112	425	273	161	
18		08/01/24	12/31/24	04/22/25		56	313	214	158	
19		11/21/24	02/28/25	04/25/25		121	419	273	152	
20		08/07/24	12/31/24	05/01/25		122	593	273	151	
21		02/15/24	12/31/24	05/02/25		18	484	165	147	
22		06/03/24	04/18/25	05/06/25		117	442	263	146	
23		07/15/24	01/10/25	05/07/25		117	601	263	146	
24		02/07/24	01/10/25	05/07/25		117	551	263	146	
25		03/28/24	01/10/25	05/07/25		86	386	231	145	
26		09/09/24	02/11/25	05/08/25		119	930	263	144	
27		03/15/23	01/10/25	05/09/25		75	769	214	139	
28		08/23/23	02/28/25	05/14/25		85	334	222	137	
29		10/31/24	02/20/25	05/16/25		4	211	138	134	

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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		03/03/25	05/15/25	05/19/25		77	386	209	132	
31		09/09/24	03/05/25	05/21/25		16	250	147	131	
32		01/23/25	05/06/25	05/22/25		8	482	133	125	
33		06/05/24	05/20/25	05/28/25		90	769	214	124	
34		08/23/23	02/28/25	05/29/25		90	315	214	124	
35		11/19/24	02/28/25	05/29/25		81	575	204	123	
36		03/04/24	03/10/25	05/30/25		7	349	126	119	
37		10/16/24	05/27/25	06/03/25		219	987	336	117	
38		01/17/23	10/29/24	06/05/25		219	1021	336	117	
39		12/14/22	10/29/24	06/05/25		90	224	196	106	
40		02/18/25	03/18/25	06/16/25		105	382	209	104	
41		09/13/24	03/05/25	06/18/25		63	357	167	104	
42		10/08/24	04/16/25	06/18/25		90	357	194	104	
43		10/08/24	03/20/25	06/18/25		60	292	158	98	
44		12/12/24	04/25/25	06/24/25		15	473	112	97	
45		06/14/24	06/10/25	06/25/25		54	389	151	97	
46		09/06/24	05/02/25	06/25/25		51	382	148	97	
47		09/13/24	05/05/25	06/25/25		54	319	151	97	
48		11/15/24	05/02/25	06/25/25		54	378	151	97	
49		09/17/24	05/02/25	06/25/25		51	355	148	97	
50		10/10/24	05/05/25	06/25/25		54	321	151	97	
51		11/13/24	05/02/25	06/25/25		54	187	151	97	
52		03/27/25	05/02/25	06/25/25		42	175	139	97	
53		04/08/25	05/14/25	06/25/25		54	168	151	97	
54		04/15/25	05/02/25	06/25/25		1	98	98	97	
55		06/24/25	06/24/25	06/25/25		113	575	209	96	
56		03/04/24	03/05/25	06/26/25		104	298	200	96	
57		12/06/24	03/14/25	06/26/25		91	504	187	96	

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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		05/14/24	03/27/25	06/26/25		91	355	187	96	
59		10/10/24	03/27/25	06/26/25		63	208	158	95	
60		03/06/25	04/25/25	06/27/25		197	971	292	95	
61		02/02/23	12/12/24	06/27/25		178	516	273	95	
62		05/02/24	12/31/24	06/27/25		113	481	208	95	
63		06/06/24	03/06/25	06/27/25		864	1133	956	92	
64		08/24/22	02/17/23	06/30/25		114	602	399	285	
65		07/23/24	03/21/25	07/01/25		102	434	193	91	
66		06/28/24	03/05/25	07/03/25		120	459	209	89	
67		12/18/23	09/04/24	07/18/25		317	652	391	74	
69		07/15/24	03/27/25	07/22/25		117	442	187	70	
70		10/19/23	03/31/25	07/29/25		120	712	183	63	
71		06/28/24	03/31/25	07/29/25		120	459	183	63	
72		09/20/24	04/28/25	08/14/25		108	375	155	47	
73		11/26/24	06/30/25	08/15/25		46	308	92	46	
74		11/05/24	07/30/25	08/15/25		16	329	62	46	
75		05/02/24	01/10/25	09/02/25		235	516	263	28	
76		05/20/25	08/08/25	09/03/25		26	133	53	27	
77		07/10/25	09/02/25	09/03/25		1	82	28	27	
78		04/07/25	05/27/25	09/03/25		99	176	126	27	
79		02/23/24	07/09/25	09/04/25		57	585	83	26	
80		04/15/25	05/27/25	09/12/25		108	168	126	18	
81		08/10/23	03/11/24	09/24/25		562	782	568	6	
82		10/21/24	06/30/25	09/25/25		87	344	92	5	
83		11/12/24	06/30/25	09/25/25		87	322	92	5	
84		01/09/23	12/12/24	09/26/25		288	995	292	4	

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					