



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

November 6, 2024

**MEMORANDUM**

**TO:** The Commission

**FROM:** Lisa J. Stevenson *LJS by wdb*  
Acting General Counsel

Adrienne Baranowicz *AB by wdb*  
Deputy Associate General Counsel for Enforcement

Claudio J. Pavia *CJP by wdb*  
Deputy Associate General Counsel for Enforcement

Wanda D. Brown *WDB*  
Assistant General Counsel  
Complaints Examination & Legal Administration

**SUBJECT:** Status of Enforcement  
Fourth Quarter FY 2024 (7/1/2024 to 09/30/2024)

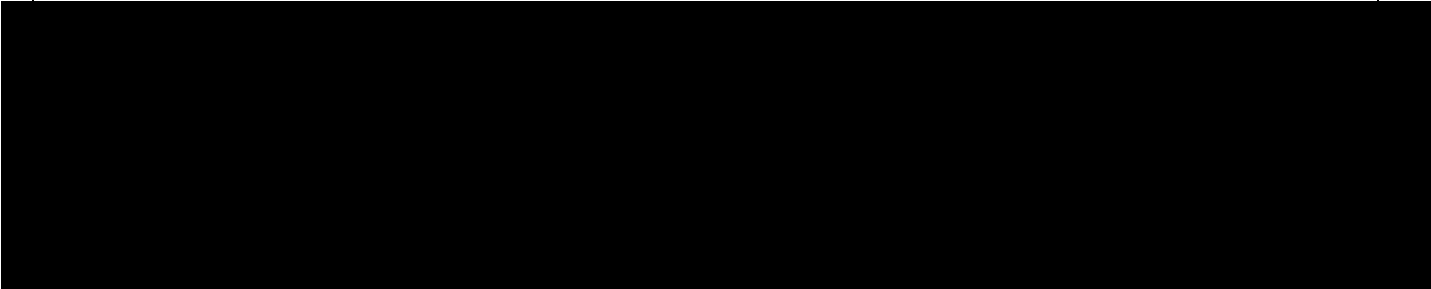
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To assist the Commission and the Office of General Counsel in assessing the current productivity of the Commission's enforcement program, we submit the Status of Enforcement for the fourth quarter (7/1/2024-9/30/2024) and the end of fiscal year 2024 (10/1/2023-9/30/2024). 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 229 matters — 90 active and 139 inactive. During fiscal year 2024, the Enforcement Division circulated First General Counsel's Reports ("FGCRs") in 82 matters in an average of 164 days, meeting the internal circulation goal 54% of the time. The Enforcement Division's Office of Complaints Examination & Legal Administration ("CELA") circulated EPS reports for 40 matters in an average of 71 days from assignment. Four new investigations commenced during the fiscal year and seven matters were pending in the investigation stage at the close of the fiscal year. The Commission closed 134 matters in fiscal year 2024 in an average of 584 days, thereby meeting its goal of closing within 15 months in 41% of these matters. Finally, the Commission assessed \$533,399.04 in civil penalties during the fiscal year.

Table 1. Caseload

<u>CASELOAD</u>	Inactive	Active	Total
Number of Cases	139	90	229
Number of Reports Pending w/Commission*	7	18	25
FGCR	N/A	59	59
Investigation	N/A	7	7
Pre-Probable Cause Conciliation	N/A	23	23
Probable Cause / PC Brief	N/A	1	1



\*As of 10/31/2024

**Table 2. CELA Statistics**

<b><u>CELA INITIAL CASE PROCESSING</u></b>	<b>Current Quarter</b>	<b>FY 2024</b>	<b>2023</b>	<b>2022</b>	<b>2021</b>	<b>2020</b>	<b>2019</b>	<b>2018</b>
Number of Cases Received	46	165	122	154	128	176	149	258
Number of Cases Rated	40	131	129	83	152	135	144	172
Average Days from Last Response to Rating (Goal: 30 days)	15	7	16	14	15	11	11	10
Ratings Meeting Goal	80% [32/40]	90% [118/131]	81% [104/129]	79% [85/108]	77% [117/152]	84% [114/135]	75% [108/144]	87% [149/172]
Number of Cases Activated	10	77	75	74	101	109	112	128
Average Days from Last Response to Activation (Goal: 90 Days)	73	108	86	99	77	39	47	44
Activations Meeting Goal	70% [7/10]	58% [45/77]	64% [48/75]	70% [52/74]	65% [66/101]	92% [100/109]	72% [81/112]	90% [115/128]
Number of Cases Dismissed Via EPS	8	40	26	20	42	18	44	76
Number of Cases Circulated Via EPS	4	39	15	27	34	24	49	50
Average Days from Assignment to Circulation of EPS Report	24	71	27	118	116	58	50	36
Number of Cases Transferred to ADRO	1	4	0	0	6	11	7	9
Average Days from Rating to Transfer to ADRO (Goal: 60 Days)	340	158	N/A	N/A	60	32	36	26
ADRO Transfers Meeting Goal	0% [0/1]	50% [2/4]	N/A [0/0]	N/A [0/0]	67% [4/6]	82% [9/11]	71% [5/7]	89% [8/9]

**Table 3. Enforcement Statistics**

<b><u>ENFORCEMENT PROCESS</u></b>	<b>Current Quarter</b>	<b>FY 2024</b>	<b>2023</b>	<b>2022</b>	<b>2021</b>	<b>2020</b>	<b>2019</b>	<b>2018</b>
<b>First General Counsel’s Reports (“FGCRs”)</b>								
Cases with FGCRs Circulated	14	82	69	88	128	103	143	95
Average Days from Activation to Circulation	192	164	169	231	165	153	177	142
FGCRs Meeting Established Time Goal	36% [5/14]	54% [44/82]	70% [48/69]	68% [60/88]	73% [93/128]	68% [70/103]	68% [97/143]	76% [72/95]
<b>Pre-Probable Cause Conciliation (“PPCC”)</b>								
Negotiations Commenced	13	78	35	114	103	2	79	80
Negotiations Concluded	8	51	89	92	49	12	84	49
Average Days in PPCC (Goal: 60 Days)	165	111	179	119	122	221	127	163
Number of Negotiations Meeting Goal	25%	33%	19%	22%	65%	0%	30%	31%
<b>Investigations</b>								
Investigations Commenced	0	4	2	7	12	1	31	16
Investigations Closed	0	1	6	9	22	8	10	8
Average Days in Investigation	N/A	932	437	862	660	549	634	387
Active Investigations at Close of Quarter	7							
<b>Probable Cause</b>								
Hearing Requests/Number Granted	0/0	0/0	1/1	2/2	1/1	0/0	1/1	1/1
Cases with Probable Cause Findings	1	2	1	2	2	0	0	0
Negotiated PC Settlements Approved	0	2	0	3	1	0	0	0
Average Days in PC Conciliation	N/A	146	N/A	841	29	N/A	N/A	N/A
<b>Closed Cases</b>								
Matters Closed	39	134	116	245	194	37	189	169
Matters Closed Within 15 Months	19 (49%)	55 (41%)	62 (53%)	55 (34%)	66 (34%)	23 (62%)	106 (56%)	104 (62%)
Average Days from Receipt to Closing	521	584	632	811	852	530	630	436
Civil Penalties	\$14,500	\$533,399.04	\$1,482,300	\$2,062,128	\$803,878	\$702,000	\$2,123,436	\$635,200

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	<div></div>			<div></div>	07/26/23
2				08/22/24	04/19/23
3				08/22/24	04/19/23
4				(12/16/24)	06/04/24
5				<div></div>	06/27/24
6				(11/22/24)	10/02/24
7				<div></div>	11/13/23
8				<div></div>	10/26/23
9				(12/15/24)	10/02/24
10				(01/08/25)	01/09/24
11				<div></div>	N/A
12					N/A
13					04/10/24
14					01/17/24
15					01/17/24
16				(12/20/24)	01/23/24
17				<div></div>	02/01/24
18					04/10/24
19					02/13/24
20					02/13/24
21					N/A
22					02/16/24
23					03/05/24
24				(01/06/25)	04/23/24
25				(01/06/25)	04/23/24
26				N/A	N/A
27				<div></div>	N/A
28				(01/08/25)	07/22/24
29				N/A	N/A

Matter	Case Name	Opened	Days Received to Close of Quarter	Circulation Date	Status Letter Date
30				(01/31/25)	07/29/24
31				(11/29/24)	10/18/24
32					07/16/24
33				(01/08/25)	07/22/24
34					05/13/24
35				(12/03/24)	07/30/24
36				(01/22/25)	07/23/24
37				(12/13/24)	10/21/24
38				(12/03/24)	07/30/24
39				(11/20/24)	09/17/24
40				08/20/24	10/21/24
41				(12/20/24)	10/21/24
42				(11/15/24)	10/21/24
43				(11/13/24)	N/A
44				(12/15/24)	10/21/24
45				(01/15/25)	10/21/24
46					09/30/24
47				(12/20/24)	10/21/24
48					09/27/24

*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	Latest SOL	Current Stage
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	Matter	Case Name	Tolling	Opened	Earliest SOL	Latest SOL	Current Stage
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39							



Table 6. Matters Beyond the Reason to Believe Stage

Matters	Case Name	Current Stage
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Table 7. First General Counsel’s Reports Pending with the Commission at the End of the Quarter (as of 9/30/24)

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		11/21//19	07/22/21	03/08/24		960	1775	1166	206	03/26/24; 03/27/24; 04/16/24; 04/18/24
2		07/26/23	12/15/23	08/20/24		249	432	290	41	
3		12/17/20	07/16/21	08/22/24		1133	1383	1172	39	
4		12/17/20	07/16/21	08/22/24		1133	1383	1172	39	
5		01/23/24	06/25/24	09/19/24		86	251	97	11	

Table 8. Foreign National Matters

Matter #	Primary Respondent	Complainant	Receipt	Assigned	Last Response	Status	To DOJ	Country	Earliest SOL
1				04/23/24					
2				12/15/23					



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

February 6, 2025

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**TO:** The Commission

**FROM:** Lisa J. Stevenson *LJS by*  
Acting General Counsel *WDB*

Adrienne Baranowicz *acb*  
Deputy Associate General Counsel for Enforcement

Claudio J. Pavia *CJP*  
Deputy Associate General Counsel for Enforcement

Wanda D. Brown *WDB*  
Assistant General Counsel  
Complaints Examination & Legal Administration

**SUBJECT:** Status of Enforcement  
First Quarter 2025 (10/1/2024 to 12/31/2024)

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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 first quarter (10/1/2024 to 12/31/2024). 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 229 matters — 107 active and 122 inactive. The Enforcement Division circulated First General Counsel's Reports ("FGCRs") in 22 matters in an average of 144 days, meeting the internal circulation goal 73% of the time. The Enforcement Division's Office of Complaints Examination & Legal Administration ("CELA") circulated EPS reports for 35 matters in an average of 29 days from assignment. No new investigations commenced, and five matters were pending in the investigation stage at the close of the quarter. The Commission closed 39 matters in the quarter in an average of 573 days, thereby meeting its goal of closing within 15 months in 49% of these matters. Finally, the Commission assessed \$329,500 in civil penalties during the quarter.

**Table 1. Caseload**

<b><u>CASELOAD</u></b>	<b>Inactive</b>	<b>Active</b>	<b>Total</b>
Number of Cases	122	107	229
Number of Reports Pending w/Commission*	11	10	21
FGCR	N/A	81	81
Investigation	N/A	6	6
Pre-Probable Cause Conciliation	N/A	20	20
Probable Cause/PC Brief	N/A	N/A	N/A

\*As of 1/31/2025

**Table 2. CELA Statistics**

<b><u>CELA INITIAL CASE PROCESSING</u></b>	<b>Current Quarter</b>	<b>2024</b>	<b>2023</b>	<b>2022</b>	<b>2021</b>	<b>2020</b>	<b>2019</b>	<b>2018</b>
Number of Cases Received	46	165	122	154	128	176	149	258
Number of Cases Rated	61	131	129	83	152	135	144	172
Average Days from Last Response to Rating (Goal: 30 days)	11	7	16	14	15	11	11	10
Ratings Meeting Goal	79% [48/61]	90% [118/131]	81% [104/129]	79% [85/108]	77% [117/152]	84% [114/135]	75% [108/144]	87% [149/172]
Number of Cases Activated	40	77	75	74	101	109	112	128
Average Days from Last Response to Activation (Goal: 90 Days)	215	108	86	99	77	39	47	44
Activations Meeting Goal	25% [10/40]	58% [45/77]	64% [48/75]	70% [52/74]	65% [66/101]	92% [100/109]	72% [81/112]	90% [115/128]
Number of Cases Dismissed Via EPS	13	40	26	20	42	18	44	76
Number of Cases Circulated Via EPS	35	39	15	27	34	24	49	50
Average Days from Assignment to Circulation of EPS Report	29	71	27	118	116	58	50	36
Number of Cases Transferred to ADRO	N/A	4	0	0	6	11	7	9
Average Days from Rating to Transfer to ADRO (Goal: 60 Days)	N/A	158	N/A	N/A	60	32	36	26
ADRO Transfers Meeting Goal	0% [0/0]	50% [2/4]	N/A [0/0]	N/A [0/0]	67% [4/6]	82% [9/11]	71% [5/7]	89% [8/9]

**Table 3. Enforcement Statistics**

<b><u>ENFORCEMENT PROCESS</u></b>	<b>Current Quarter</b>	<b>2024</b>	<b>2023</b>	<b>2022</b>	<b>2021</b>	<b>2020</b>	<b>2019</b>	<b>2018</b>
<b>First General Counsel’s Reports (“FGCRs”)</b>								
Cases with FGCRs Circulated	22	82	69	88	128	103	143	95
Average Days from Activation to Circulation	144	164	169	231	165	153	177	142
FGCRs Meeting Established Time Goal	73% [16/22]	54% [44/82]	70% [48/69]	68% [60/88]	73% [93/128]	68% [70/103]	68% [97/143]	76% [72/95]
<b>Pre-Probable Cause Conciliation (“PPCC”)</b>								
Negotiations Commenced	14	78	35	114	103	2	79	80
Negotiations Concluded	14	51	89	92	49	12	84	49
Average Days in PPCC (Goal: 60 Days)	186	111	179	119	122	221	127	163
Number of Negotiations Meeting Goal	14%	33%	19%	22%	65%	0%	30%	31%
<b>Investigations</b>								
Investigations Commenced	0	4	2	7	12	1	31	16
Investigations Closed	0	1	6	9	22	8	10	8
Average Days in Investigation	N/A	932	437	862	660	549	634	387
Active Investigations at Close of Quarter	5							
<b>Probable Cause</b>								
Hearing Requests/Number Granted	0/0	0/0	1/1	2/2	1/1	0/0	1/1	1/1
Cases with Probable Cause Findings	0	2	1	2	2	0	0	0
Negotiated PC Settlements Approved	0	2	0	3	1	0	0	0
Average Days in PC Conciliation	N/A	146	N/A	841	29	N/A	N/A	N/A
<b>Closed Cases</b>								
Matters Closed	39	134	116	245	194	37	189	169
Matters Closed Within 15 Months	19 (49%)	55 (41%)	62 (53%)	55 (34%)	66 (34%)	23 (62%)	106 (56%)	104 (62%)
Average Days from Receipt to Closing	573	584	632	811	852	530	630	436
Civil Penalties	\$329,500	\$533,399.04	\$1,482,300	\$2,062,128	\$803,878	\$702,000	\$2,123,436	\$635,200

**Table 4. Cases Pending for 12 without a Commission Vote**

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

Matter	Case Name	Opened	Days Received to Close of Quarter	Circulation Date	Status Letter Date
30				(03/15/25)	10/23/24
31				(03/15/25)	10/23/24
32				(02/28/25)	09/30/24
33				(04/11/25)	09/27/24
34				(02/07/25)	01/22/25
35					N/A
36				(02/19/25)	01/31/25
37				12/19/24	12/02/24
38				(02/28/25)	02/03/25

*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	Latest SOL	Current Stage
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	Matter	Case Name	Tolling	Opened	Earliest SOL	Latest SOL	Current Stage
30							
31							
32							

Table 6. Matters Beyond the Reason to Believe Stage

Matters	Case Name	Current Stage
1	<div></div>	
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**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		06/22/23	10/24/24	12/20/24		57	558	68	11	01/28/25; 01/30/25
2		11/30/23	09/24/24	12/19/24		86	397	98	12	01/28/25; 01/30/25
3		02/06/24	09/24/24	12/19/24		86	329	98	12	01/28/25; 01/30/25

**Table 8. Foreign National Matters**

Matter #	Primary Respondent	Complainant	Receipt	Assigned	Last Response	Status	To DOJ	Country	Earliest SOL
1				12/15/23					
2				N/A					