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Public Comments on Request for Comment on Enforcement Process:=====

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Comment: I am very pleased the FEC is looking to revamp its enforcement procedures. The following are positives and negatives I found with the current and/or proposed process:

1. I strongly support continuing to use outside information easily available in both the RTB stage and probable cause stage. Information such as FEC campaign statements, websites, statements made by candidates publicly, and newspaper reports should all be used to establish violations. However, only certain websites should be used, like newspapers. Blogs and gossip websites may leave the door open for hearsay or unproven allegations that may verge on untruths.

2. I really like the idea of providing settlement options prior to probable cause hearings for violators. 98% of civil cases are settled in America, often because it is simply more cost effective to settle than to try a case. The same is true with the FEC-it may be more cost effective for BOTH the FEC and violators to settle, particularly when it comes to time. Anything that may speed up the enforcement process should be supported.

3. The FEC worries that legal theories not supported in the OGC's RTC recommendations should not be used in violations not alleged in the complaint. There are positives and negatives to this point. I strongly support the idea that if information is found supporting new violations not alleged in the complaint, they should be researched and looked into carefully. However, there needs to be a stoppage point when the FEC looks no further. An alleged violator cannot present a defense if he has no idea what the allegations are.

4. My final point focuses on the timeliness of cases before the FEC. One of my biggest problems with the FEC is how slowly cases wind their way through the agency. I strongly support shortening the time period evidence may be searched for, particularly when candidates for elected office lose. Many first time offenders committed low level offenses and deserve the right to move on with their lives.