



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

April 30, 2024

**MEMORANDUM**

**TO:** The Commission

**FROM:** Lisa J. Stevenson *LJS*  
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Charles Kitcher *CK*  
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for Enforcement

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**SUBJECT:** Status of Enforcement – Second Quarter 2024 (01/01/24-03/31/24)

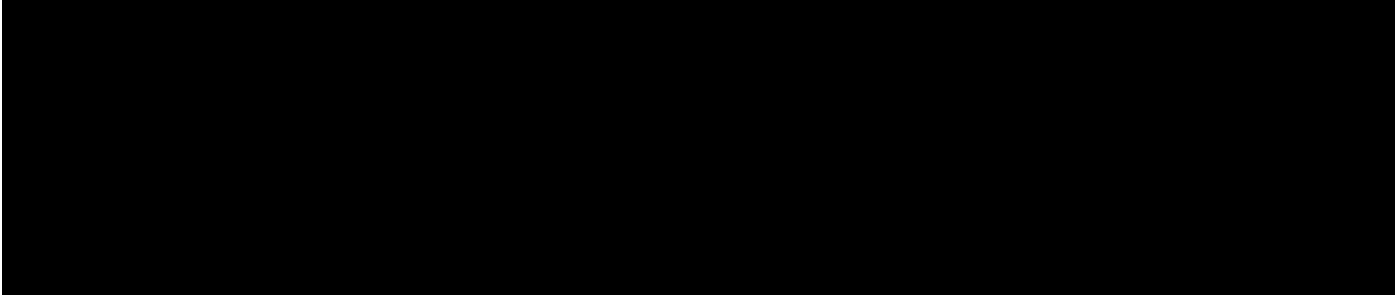
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To assist the Commission and the Office of General Counsel in assessing the current productivity of the Commission's enforcement program, we submit the Status of Enforcement for the second quarter of fiscal year 2024 (01/01/2024-03/31/2024). The tables 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 207 matters — 110 active and 97 inactive. During the second quarter of fiscal year 2024, the Enforcement Division circulated First General Counsel's Reports ("FGCRs") in 12 matters in an average of 136 days, meeting the internal circulation goal 58% of the time. The Enforcement Division's Office of Complaints Examination & Legal Administration ("CELA") circulated EPS reports for 21 matters in an average of 86 days. No new investigations commenced during the second quarter and three matters were pending in the investigation stage at the close of the quarter. The Commission closed 33 matters in an average of 620 days, thereby meeting its goal of closing within 15 months in 36% of these matters. Finally, the Commission assessed \$174,000 in civil penalties during the second quarter.

**Table 1. Caseload**

<b><u>CASELOAD</u></b>	<b>Inactive</b>	<b>Active</b>	<b>Total</b>
Number of Cases	97	110	207
Number of Reports Pending w/Commission*	3	17	20
FGCR	N/A	86	86
Investigation	N/A	3	3
Pre-Probable Cause Conciliation	N/A	18	18
Probable Cause / PC Brief	N/A	2	2



\*As of 04/19/2024

**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	72	122	154	128	176	149	258
Number of Cases Rated	34	52	129	83	152	135	144	172
Average Days from Last Response to Rating (Goal: 30 days)	9	6	16	14	15	11	11	10
Ratings Meeting Goal	83% [15/18]	90% [47/52]	81% [104/129]	79% [85/108]	77% [117/152]	84% [114/135]	75% [108/144]	87% [149/172]
Number of Cases Activated	21	48	75	74	101	109	112	128
Average Days from Last Response to Activation (Goal: 90 Days)	70	115	86	99	77	39	47	44
Activations Meeting Goal	67% [14/21]	57% [26/46]	64% [48/75]	70% [52/74]	65% [66/101]	92% [100/109]	72% [81/112]	90% [115/128]
Number of Cases Dismissed Via EPS	16	16	26	20	42	18	44	76
Number of Cases Circulated Via EPS	21	29	15	27	34	24	49	50
Average Days from Assignment to Circulation of EPS Report	86	84	27	118	116	58	50	36
Number of Cases Transferred to ADRO	1	2	0	0	6	11	7	9
Average Days from Rating to Transfer to ADRO (Goal: 60 Days)	211	3	N/A	N/A	60	32	36	26
ADRO Transfers Meeting Goal	0% [0/1]	67% [2/3]	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	12	29	69	88	128	103	143	95
Average Days from Activation to Circulation	136	187	169	231	165	153	177	142
FGCRs Meeting Established Time Goal	58% [7/12]	41% [12/29]	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	27	50	35	114	103	2	79	80
Negotiations Concluded	18	33	89	92	49	12	84	49
Average Days in PPCC (Goal: 60 Days)	130	95	179	119	122	221	127	163
Number of Negotiations Meeting Goal	22%	45%	19%	22%	65%	0%	30%	31%
<b>Investigations</b>								
Investigations Commenced	0	0	2	7	12	1	31	16
Investigations Closed	1	1	6	9	22	8	10	8
Average Days in Investigation	932	932	437	862	660	549	634	387
Active Investigations at Close of Quarter	3							
<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	1	1	2	2	0	0	0
Negotiated PC Settlements Approved	0	0	0	3	1	0	0	0
Average Days in PC Conciliation	N/A	N/A	N/A	841	29	N/A	N/A	N/A
<b>Closed Cases</b>								
Matters Closed	33	55	116	245	194	37	189	169
Matters Closed Within 15 Months	12 (36%)	18 (33%)	62 (53%)	55 (34%)	66 (34%)	23 (62%)	106 (56%)	104 (62%)
Average Days from Receipt to Closing	620	639	632	811	852	530	630	436
Civil Penalties	\$174,000	\$286,999	\$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**

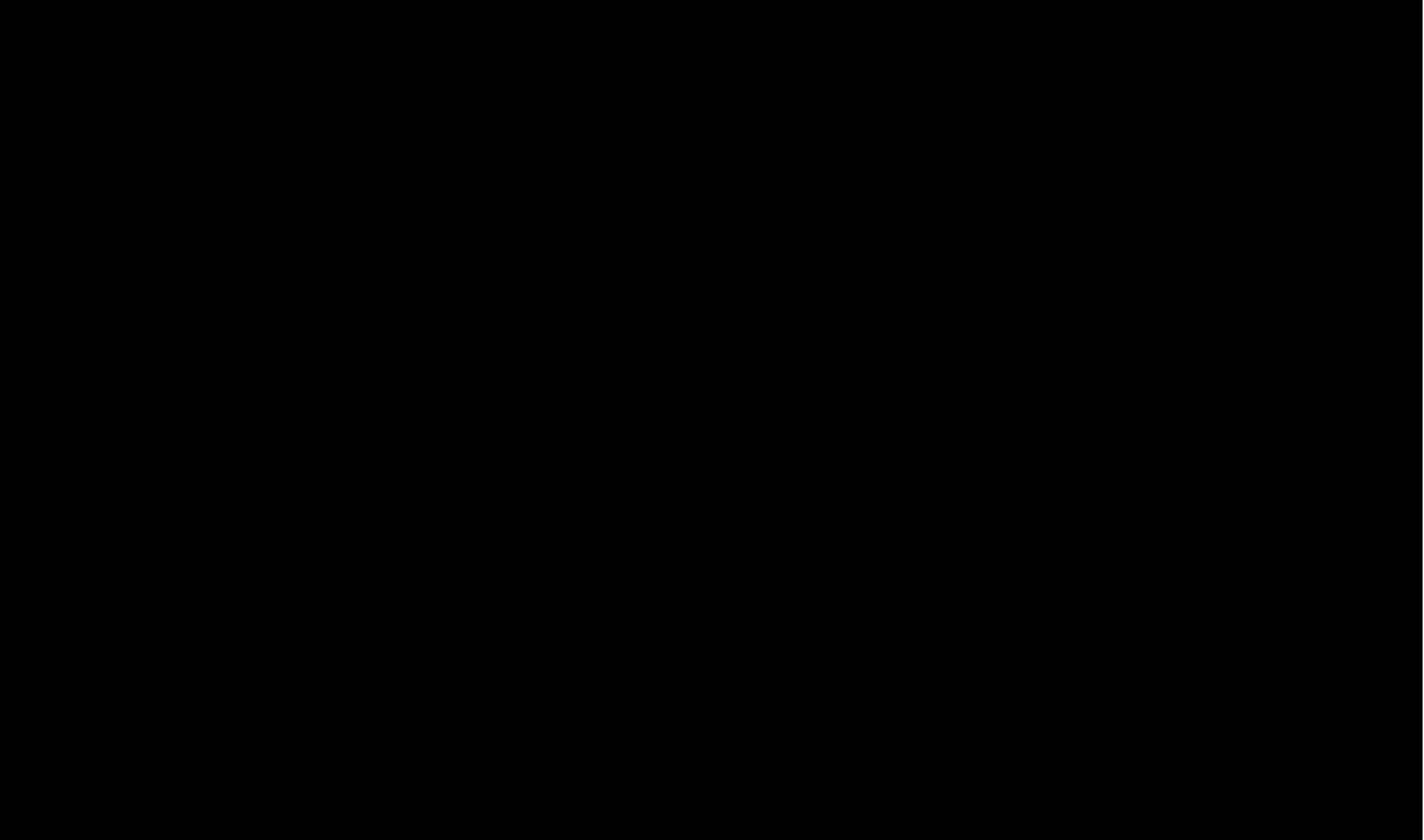
Matter	Case Name	Opened	Days Received to Close of Quarter	Circulation Date	Status Letter Date
1				04/10/24	11/08/23
2				04/02/24	10/19/23
3					09/21/21
4					04/19/23
5					04/19/23
6				(05/15/24)	07/25/23
7				10/31/23	07/17/23
8				(05/15/24)	07/25/23
9				(06/28/24)	06/02/23
10				12/13/22	10/25/23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

Matter	Case Name	Opened	Days Received to Close of Quarter	Circulation Date	Status Letter Date
29				(05/31/24)	11/01/23
30				04/10/24	11/08/23
31					N/A
32				(05/16/24)	N/A
33					N/A
34				(08/01/24)	04/10/24
35				04/18/24	12/21/23
36					01/17/24
37					01/17/24
38				(06/28/24)	01/23/24
39				(06/28/24)	04/18/24
40				(05/09/24)	02/06/24
41					02/01/24
42				(08/02/24)	04/10/24
43				04/26/24	10/25/23
44					02/13/24
45					02/13/24
46				(05/15/24)	N/A
47					N/A
48				(06/28/24)	N/A
49					02/16/24
50				(05/09/24)	N/A
51				(08/02/24)	N/A
52					03/05/24
53					04/22/24
54				(05/30/24)	04/16/24
55				(05/30/24)	04/16/24
56					04/22/24
57				N/A	N/A
58				(07/12/24)	N/A

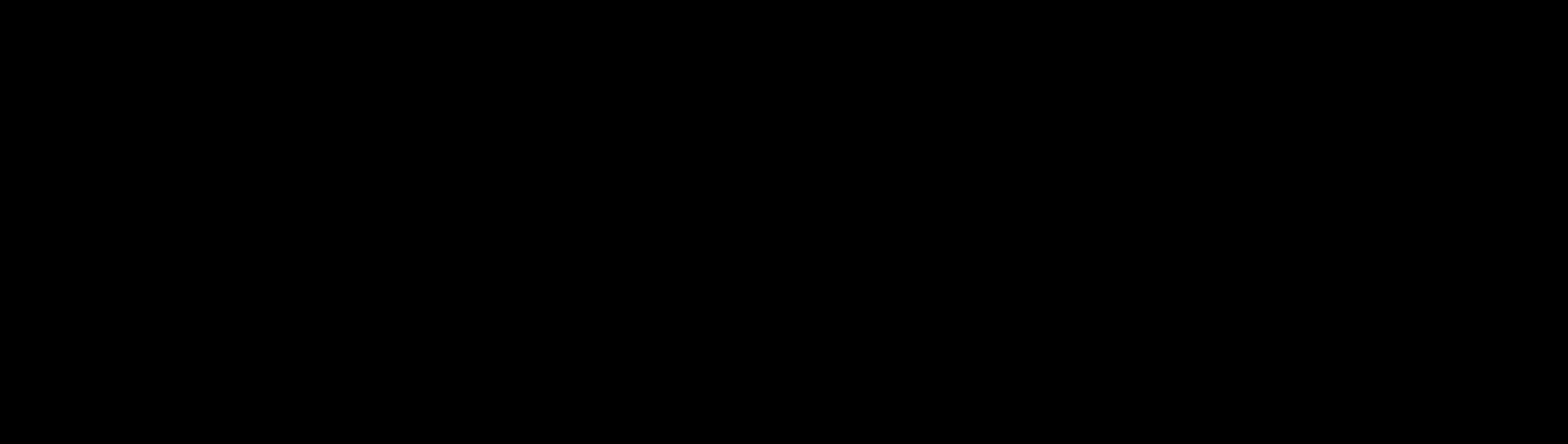
Matter	Case Name	Opened	Days Received to Close of Quarter	Circulation Date	Status Letter Date
59	[Redacted]			(06/28/24)	04/22/24
60				(06/13/24)	N/A

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

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

	<b>Matter</b>	<b>Case Name</b>	<b>Tolling</b>	<b>Opened</b>	<b>Earliest SOL</b>	<b>Latest SOL</b>	<b>Current Stage</b>
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
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28							
29							



	<b>Matter</b>	<b>Case Name</b>	<b>Tolling</b>	<b>Opened</b>	<b>Earliest SOL</b>	<b>Latest SOL</b>	<b>Current Stage</b>
30							
31							
32							
33							
34							
35							
36							
37							
38							
39							
40							
41							
42							

**Table 6. Matters Beyond the Reason to Believe Stage**

Matters	Case Name	Current Stage
1		
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9		
10		
11		
12		
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15		
16		
17		
18		
19		
20		
21		
22		
23		
24		

**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	Held Over
1	[REDACTED]	05/06/22	08/16/22	12/13/22	[REDACTED]	119	695	593	474	01/24/23; 01/26/23; 02/07/23; 02/09/23; 03/28/23; 03/30/23; 03/31/23; 04/18/23; 04/19/23; 05/02/23; 06/21/23; 06/22/23; 07/11/23; 07/13/23
2	[REDACTED]	03/23/21	07/08/21	10/31/23	[REDACTED]	845	1104	997	152	12/12/23; 12/14/23; 03/12/24; 03/14/24; 03/12/24; 03/14/24; 04/16/24; 04/18/24
3	[REDACTED]	07/28/22	03/07/23	01/09/24	[REDACTED]	308	612	390	82	03/12/24; 03/14/24; 03/26//24;03/27/24; 04/16/24; 04/18/24
4	[REDACTED]	04/18/23	10/13/23	02/09/24	[REDACTED]	119	348	170	51	03/12/24; 03/14/24
5	[REDACTED]	05/01/23	10/13/23	03/19/24	[REDACTED]	158	335	170	12	

**Table 8. Foreign National Matters**

Matter #	Primary Respondent	Complainant	Receipt	Assigned	Last Response	Status	To DOJ	Country	Earliest SOL
1				01/28/19					
2				01/03/24					
3				12/15/23					
4				12/08/23					