



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

**Kory Langhofer  
Statecraft PLLC  
649 North Fourth Avenue, First Floor  
Phoenix, Arizona 85003**

FEB 26 2019

**RE: MUR 7458**  
**Arizona Republican Party**  
**and Bob Lettieri, as treasurer,**  
**Debbie Lesko for Congress**  
**and Ashley Ragan, Treasurer**

**Dear Mr. Langhofer:**

On August 10, 2018, the Federal Election Commission ("Commission") notified your clients of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). On February 21, 2019, based upon the information contained in the complaint and information provided by respondents, the Commission decided to dismiss allegations that Arizona Republican Party and Bob Lettieri in his official capacity as treasurer and Debbie Lesko for Congress and Ashley Ragan in her official capacity as treasurer violated provisions of the Act. The Commission then closed its file in this matter. A copy of the General Counsel's Report, which more fully explains the basis for the Commission's decision, is enclosed.

Documents related to the case will be placed on the public record within 30 days. See Statement of Policy Regarding Disclosure of Closed Enforcement and Related Files, 68 Fed. Reg. 70,426 (Dec. 18, 2003) and Statement of Policy Regarding Placing First General Counsel's Reports on the Public Record, 74 Fed. Reg. 66132 (Dec. 14, 2009). If you have any questions, please contact Kristina Portner, the attorney assigned to this matter, at (202) 694-1518.

Sincerely,

**Lisa J. Stevenson**  
**Acting General Counsel**

BY: Jeff S. Jordan  
Assistant General Counsel

**Enclosure:**  
**General Counsel's Report**

**BEFORE THE FEDERAL ELECTION COMMISSION**

**ENFORCEMENT PRIORITY SYSTEM  
DISMISSAL REPORT**

**MUR: 7458**

**Respondents:** Arizona Republican Party  
and Bob Lettieri, Treasurer;  
Debbie Lesko for Congress  
and Ashley Ragan, Treasurer  
("the Committee")<sup>1</sup>

**Complaint Receipt Date:** August 6, 2018

**Response Date:** September 25, 2018

**EPS Rating:**

**Alleged Statutory**

**52 U.S.C. § 30104(b)(2)-(5), (8)**

**Regulatory Violations:**

**11 C.F.R. §§ 104.3(a)(3), (b)(2), 104.9(a), 104.11(b)**

The Complaint alleges that the Committee used space at the Arizona Republican Party's office, but failed to report in-kind contributions or expenditures for such use. Respondents assert that the Committee leased the space for a fair market value of \$250 a month starting in July 2018, and that the rental payments were disclosed in the Committee's Reports. Respondents also deny that the Committee maintained any space in the Arizona Republican Party's office prior to the start of the lease, but acknowledge that Committee personnel would hold occasional impromptu meetings there before the start of the lease.

Based on its experience and expertise, the Commission has established an Enforcement Priority System using formal, pre-determined scoring criteria to allocate agency resources and assess whether particular matters warrant further administrative enforcement proceedings. These criteria include (1) the gravity of the alleged violation, taking into account both the type of activity and the amount in violation; (2) the apparent impact the alleged violation may have had on the electoral process; (3) the complexity of the legal issues raised in the matter; and (4) recent trends in potential violations and other developments in the law. This matter is rated as low priority for

---

<sup>1</sup> Debbie Lesko was a candidate for the U.S. House of Representatives for Arizona's Eighth Congressional District. Debbie Lesko for Congress is her principal campaign committee.


**appropriate letters.**


**Lisa J. Stevenson**  
**Acting General Counsel**

**Kathleen M. Guith**  
**Associate General Counsel**

Date \_\_\_\_\_

**BY:**

  
Stephen Gura  
Deputy Associate General Counsel

  
Jeff S. Jordan  
Assistant General Counsel

Kristina Portner  
Kristina M. Portner  
Attorney