

**BEFORE THE FEDERAL ELECTION COMMISSION**

**ENFORCEMENT PRIORITY SYSTEM  
DISMISSAL REPORT**

**MUR: 7604**

**Respondents: Friends of Vangie Williams  
and Stacy Bullock, as Treasurer  
("Committee")<sup>1</sup>**

**Complaint Receipt Date: May 6, 2019**

**Response Date: May 29, 2019**

**EPS Rating:**

**Alleged Statutory**

**52 U.S.C. § 30104(b)(8)**

**Regulatory Violations:**

**11 C.F.R. §§ 104.3(d), 104.11(b), 116.6 (c)**

The Complaint alleges that the Committee violated reporting requirements of the Act when it failed to report certain debts and obligations, including Complainant's unpaid wages for work performed between November 1-6, 2018, and the wages owed to other individuals who worked for the Committee.<sup>2</sup> Without directly addressing the Complaint's allegations, the Response included a copy of a check issued to the Complainant purportedly for her final week of service.<sup>3</sup> The Response states that the Committee's new treasurer<sup>4</sup> will be working with a compliance consultant to ensure that the Committee's next disclosure report and any amended reports are accurate.<sup>5</sup>

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

<sup>1</sup> Vangie Williams was a 2018 candidate for the U.S. House of Representatives in Virginia's 1<sup>st</sup> Congressional District. Friends of Vangie Williams was her principal campaign committee.

<sup>2</sup> Compl. at 2 (May 6, 2019).

<sup>3</sup> Resp. at 1, 3 (May 29, 2019). Check #50050 was disbursed to Complainant on May 1, 2019 for \$365.44.

<sup>4</sup> On September 28, 2018, the Committee filed an Amended Statement of Organization identifying a new treasurer.

<sup>5</sup> Resp. at 1 (May 29, 2019).

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 Commission action after application of these pre-established criteria. Given that low rating, the modest amount at issue, and the partial remedial actions taken by the Committee, we recommend that the Commission dismiss the Complaint consistent with the Commission's prosecutorial discretion to determine the proper ordering of its priorities and use of agency resources.<sup>6</sup> We also recommend that the Commission close the file and send the appropriate letters.

Lisa J. Stevenson  
Acting General Counsel

Charles Kitcher  
Acting Associate General Counsel

7.8.19  
Date

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<sup>6</sup> See *Heckler v. Chaney*, 470 U.S. 821, 831-32 (1985).