



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

JUL 26 2019

Stacy Bullock
Friends of Vangie Williams
P.O. Box 7572
Fredericksburg, VA 22401

RE: MUR 7604
Friends of Vangie Williams
and Stacy Bullock, as treasurer

Dear Ms. Bullock:

On May 6, 2019, the Federal Election Commission ("Commission") notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). On July 24, 2019, based upon the information contained in the complaint and information provided by respondents, the Commission decided to dismiss allegations that Friends of Vangie Williams and you, in your 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) 694-1650.

Sincerely,

Lisa J. Stevenson
Acting General Counsel

BY: Jeff S. Jordan
Assistant General Counsel

Enclosure:
General Counsel's Report

1408444-2418

BEFORE THE FEDERAL ELECTION COMMISSION

**ENFORCEMENT PRIORITY SYSTEM
DISMISSAL REPORT**

MUR: 7604

Respondents: Friends of Vangie Williams
and Stacy Bullock, as Treasurer
("Committee")¹

Complaint Receipt Date: May 6, 2019

Response Date: May 29, 2019

EPS Rating:

**Alleged Statutory
Regulatory Violations:**

**52 U.S.C. § 30104(b)(8)
11 C.F.R. §§ 104.3(d), 104.11(b), 116.6 (c)**

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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.² 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.³ The Response states that the Committee's new treasurer⁴ will be working with a compliance consultant to ensure that the Committee's next disclosure report and any amended reports are accurate.⁵

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

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

² Compl. at 2 (May 6, 2019).

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

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

⁵ 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.⁶ 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

BY: Stephen Gura
Stephen Gura
Deputy Associate General Counsel

Jeff S. Jordan
Jeff S. Jordan
Assistant General Counsel

Heather McGuire
Heather McGuire
Legal Intern

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

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