



FEDERAL ELECTION COMMISSION
Washington, DC

March 5, 2025

VIA ELECTRONIC MAIL

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Jacquelyn Lopez & Emma Anspach
Elias Law Group LLP
250 Massachusetts Ave NW, Suite 400
Washington, DC 20001

RE: MUR 8197
Schiff for Senate, *et al.*

Dear Counsel:

On January 22, 2024, the Federal Election Commission notified your clients, Adam Schiff, Schiff for Senate, and Jeremy Begun, in his official capacity as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time.

Upon further review of the allegations contained in the complaint, and information supplied by your clients, the Commission, on January 30, 2025, voted to dismiss this matter effective March 5, 2025. The General Counsel's Report, which more fully explains the Commission's decision, is enclosed for your information.

Documents related to the case will be placed on the public record today. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016).

Sincerely,

Lisa J. Stevenson
Acting General Counsel

Wanda D. Brown

BY: Wanda D. Brown
Assistant General Counsel

Enclosure
General Counsel's Report

BEFORE THE FEDERAL ELECTION COMMISSION

ENFORCEMENT PRIORITY SYSTEM

DISMISSAL REPORT

MUR: 8197

Respondents: Schiff for Senate and Jeremy Begun in
his official capacity as treasurer
Adam Schiff
City of Pasadena

Complaint Receipt Date: January 12, 2024

**Alleged Statutory/
Regulatory Violations:**

52 U.S.C. §§ 30104, 30116
11 C.F.R. §§ 110.1, 104.3(a)

The Complaint alleges that Victor Gordo, mayor of Pasadena, California, invited 2024 Senate candidate Adam Schiff to ride in the mayor's float in the Pasadena Tournament of Roses parade (the "Rose Parade") held on January 1, 2024, and that this invitation constituted an excessive in-kind contribution from the City of Pasadena (the "City") to Schiff for Senate and Jeremy Begun in his official capacity as treasurer, Schiff's principal campaign committee, in violation of the Federal Election Campaign Act of 1971, as amended (the "Act").¹ The Complaint alleges that the mayor's invitation provided Schiff with free television coverage viewable by a national audience and the apparent endorsement of the City which, when taken together, had value in excess of applicable contribution limits.²

In its Response, Schiff for Senate argues that Schiff attended the Rose Parade in his official capacity as a U.S. Representative.³ The Response states that Schiff's official office received an invitation requesting the Congressman's attendance at the Rose Parade, that Schiff's official Chief

¹ Compl. at 1-2 (Jan. 17, 2024).

² *Id.* at 2.

³ Schiff for Senate Resp. at 1-2 (Mar. 7, 2024).

1 of Staff joined Schiff at the Rose Parade, and that Schiff posted a photograph taken at the Rose
2 Parade on his official House of Representatives account on the social media platform X.⁴ The
3 Response further notes that Schiff did not organize any campaign events in connection with his
4 appearance at the Rose Parade, nor did Schiff make any fundraising solicitations in connection with
5 the event, and there were no communications advocating for Schiff's election made during the Rose
6 Parade.⁵ The Response argues that because Schiff appeared as an incumbent congressman in his
7 official role, rather than in his role as a candidate, this appearance was not regulated by the Act.⁶
8 The City's Response notes that a separate nonprofit entity, and not the City, is responsible for the
9 Rose Parade, and that the fire truck that Gordo and his guests rode in is not owned by the City.⁷
10 The Response further states that "[t]he City had no role in determining to use the fire truck during
11 the Parade, nor who rode in the vehicle."⁸

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

⁴ *Id.* at 2.

⁵ *Id.*

⁶ *Id.* at 3.

⁷ City of Pasadena Resp. at 1 (Sept. 30, 2024).

⁸ *Id.*

1 recommend that the Commission dismiss the Complaint consistent with the Commission's
2 prosecutorial discretion to determine the proper ordering of its priorities and use of agency
3 resources.⁹ We also recommend that the Commission close the file effective 30 days from the date
4 the certification of its vote is signed (or on the next business day after the 30th day, if the 30th day
5 falls on a weekend or holiday) and send the appropriate letters.

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12 December 11, 2024
13 Date

Lisa J. Stevenson
Acting General Counsel

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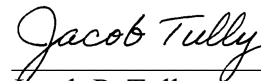
BY:



Claudio J. Pavia
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Wanda D. Brown

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Jacob P. Tully
Attorney

⁹ *Heckler v. Chaney*, 470 U.S. 821, 831-32 (1985).