

23L-25

REPORTS ANALYSIS DIVISION REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: June 7, 2023

ANALYST: Michael Adamsky

- I. COMMITTEE: PA Lawyer Fund
C00827659
Raymond Gabriel Lahoud, Treasurer
2063 Flint Hill Road Coopersburg,
PA 18036
- II. RELEVANT STATUTE: 52 U.S.C. § 30104(g)(1)
11 C.F.R. § 104.4(c)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Timely File 24-Hour Reports)

PA Lawyer Fund (“the Committee”) failed to timely file one (1) 24-Hour Report to support eight (8) independent expenditures totaling \$2,500,000.00 disclosed on the 2022 30-Day Post-General Report, made after the 20th day but more than 24 hours before the election (Attachment 1).

On November 18, 2022, the Committee filed the [2022 30-Day Post-General Report](#) covering the period from October 20, 2022, to November 28, 2022. The report included a [Schedule E \(Itemized Independent Expenditures\)](#) disclosing eight (8) independent expenditures totaling \$2,500,000.00 made in support of or opposition to eight (8) Federal candidates.

On March 6, 2023, a [Request for Additional Information \(RFAI\)](#) was sent to the Committee referencing the 2022 30-Day Post-General Report. The RFAI noted that the Committee may have failed to timely file one (1) or more of the required 24-Hour Reports of independent expenditures. A chart was included with the RFAI identifying eight (8) independent expenditures, totaling \$2,500,000.00, for which a 24-Hour Report had not been filed (Attachment 1).

On March 7, 2023, the Committee filed one (1) 24-Hour Report to support eight (8) independent expenditures totaling \$2,500,000.00 disseminated on November 5, 2022.

On May 17, 2023, the Committee filed a [FEC Form 99 \(Miscellaneous Electronic Submission\)](#) in response to the RFAI referencing the 2022 30-Day Post-General Report. The Committee stated:

“As an initial matter, PALF respectfully apologizes to the Federal Election Commission (the FEC) for not filing the 24-hour report noted in the RFAI, and submits that this initial failure to file the 24-hour report was the result of an incorrect determination and inadvertent error in said determination as to whether a 24-hour report was due, given that PALF was only formed on October 28, 2022 with the FEC.

PALF timely filed the 30 Day Post-General Report. Further, PALF received the noted RFAI on March 6, 2023 and filed the 24-hour report that the RFAI requested on March 7, 2023, without any delay.

To ensure that no further reporting compliance issues arise, PALF has taken affirmative steps, since receiving the RFAI, to prevent any reoccurrence. Specifically, PALF has developed an integral reporting calendaring system, that contains tickler dates for all required reports as well as dates for when any 24-hour or 48-hour reports would be due prior to any future election. Moreover, PALC has designated a specific compliance team member to review all filing deadlines, expenditures, and ensure that all necessary reports are timely filed. Finally, as treasurer, I read, for a third time, all the FECs campaign finance reporting rules and regulations, to ensure that PALF that all necessary obligations, reporting and other, are well established, known, and strictly adhered to.

Finally, PALF has updated campaign financial reporting software that is used to enter all financial information related to PALF, with filing triggers that are consistent with and in adherence to all FEC reporting rules, requirements, and regulations.

PALF again submits that the failure to file the 24-hour report was unintentional and truly an inadvertent error, which was remedied without delay, and followed by PALFs institution of strict campaign finance compliance measures and safeguards.”

Since May 17, 2023, the Reports Analysis Division (RAD) logged two (2) communications with a representative of the Committee which reflect efforts to help the Committee voluntarily comply with the Act regarding the matters referenced above. RAD was able to speak with the Committee on both of these occasions and notified Raymond G. Lahoud, Treasurer, that the Committee may be referred to another Commission office for further review. RAD advised the Committee to file an FEC Form 99 with any clarifying

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information for the public record (Attachment 2). To date, no further communications have been received from the Committee regarding this matter.

Filings and correspondence related to the Committee can be found here: [PA Lawyer Fund](#).

PA Lawyer Fund (C00827659)
[2022 30-Day Post-General Report](#)

24-Hour Report Not Timely Filed

Name of Payee	Date of Dissemination (Schedule E)	Expenditure Amount	Candidate Supported/Opposed	Election	24-Hour Report Received
NPG Group	11/5/2022	\$185,000.00 <i>24-Hour Report Required</i>	BOLDUC, DONALD C.	G2022	3/7/2023
NPG Group	11/5/2022	\$350,000.00 <i>24-Hour Report Required</i>	HASSAN, MARGARET WOOD	G2022	3/7/2023
NPG Group	11/5/2022	\$15,000.00 <i>24-Hour Report Required</i>	LAHOOD, DARIN MCKAY	G2022	3/7/2023
NPG Group	11/5/2022	\$500,000.00 <i>24-Hour Report Required</i>	MALONEY, SEAN PATRICK	G2022	3/7/2023
NPG Group	11/5/2022	\$250,000.00 <i>24-Hour Report Required</i>	MURKOWSKI, LISA	G2022	3/7/2023
NPG Group	11/5/2022	\$500,000.00 <i>24-Hour Report Required</i>	SCHUMER, CHARLES E.	G2022	3/7/2023
NPG Group	11/5/2022	\$500,000.00 <i>24-Hour Report Required</i>	VANCE, J D	G2022	3/7/2023
NPG Group	11/5/2022	\$200,000.00 <i>24-Hour Report Required</i>	WILD, SUSAN	G2022	3/7/2023