

**FEDERAL ELECTION COMMISSION**  
**FIRST GENERAL COUNSEL'S REPORT**

RAD REFERRAL: 23L-25  
DATE OF REFERRAL: June 7, 2023  
DATE ACTIVATED: October 18, 2023  
██████████  
EXPIRATION OF SOL: November 6, 2027  
ELECTION CYCLE: 2022

**SOURCE:** Internally Generated

**RESPONDENT:** PA Lawyer Fund and Raymond G. Lahoud  
in his official capacity as treasurer

**RELEVANT STATUTES  
AND REGULATIONS:** 52 U.S.C. § 30101(17)  
52 U.S.C. § 30104(b), (g)  
11 C.F.R. § 100.22(a), (b)  
11 C.F.R. § 104.4  
11 C.F.R. § 109.10(d)  
11 C.F.R. § 111.44

**INTERNAL REPORTS CHECKED:** Disclosure Reports

**FEDERAL AGENCIES CHECKED:** None

**I. INTRODUCTION**

The Reports Analysis Division (“RAD”) referred PA Lawyer Fund and Raymond G. Lahoud in his official capacity as treasurer (the “Committee”) to the Office of General Counsel for failing to timely file one 24-Hour Report to support eight independent expenditures (“IEs”) totaling \$2,500,000.00.<sup>1</sup> On November 18, 2022, the Committee filed its 2022 30-Day Post-General Report that included a Schedule E (Itemized IE) disclosing the eight IEs at issue.<sup>2</sup>

<sup>1</sup> Referral at 1 (June 7, 2023).

<sup>2</sup> PA Lawyer Fund, 2022 30-Day Post-General Report, (Nov. 18, 2022), <https://docquery.fec.gov/pdf/734/202211189546831734/202211189546831734.pdf>.

1           The Committee acknowledges its inadvertent failure to timely file its 24-Hour Report,  
2           citing a misinterpretation of the 24-Hour Report requirement.<sup>3</sup> The Committee argues that it  
3           promptly responded to a Request for Additional Information (“RFAI”) regarding the missed 24-  
4           Hour Report and has implemented procedures to prevent future violations.<sup>4</sup> Furthermore, the  
5           Committee asserts that it has ceased operations, refunded all contributions on May 26, 2023, and  
6           has not solicited any contributions since that date.<sup>5</sup> The Committee intends to file a termination  
7           report once the matter at issue in this RAD Referral is closed.<sup>6</sup> In sum, the Committee requests  
8           that the Commission exercise its discretion to dismiss this matter and allow the Committee to  
9           terminate.<sup>7</sup>

10           Despite the Committee’s intention to terminate, the circumstances of the violation do not  
11           support dismissal of the matter. Accordingly, we recommend that the Commission find reason to  
12           believe that PA Lawyer Fund and Raymond G. Lahoud in his official capacity as treasurer  
13           violated 52 U.S.C. § 30104(g)(1) of the Federal Election Campaign Act of 1971, as amended  
14           (the “Act”), and 11 C.F.R. § 104.4(c) of the Commission’s regulations by failing to timely report  
15           IEs aggregating \$1,000 or more made after the 20th day, but more than 24 hours before an  
16           election. Additionally, we recommend that the Commission enter into pre-probable cause  
17           conciliation and approve a proposed conciliation agreement

18           .

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<sup>3</sup> Resp. at 1 (June 13, 2023).

<sup>4</sup> *Id.* at 2.

<sup>5</sup> *Id.* at 3.

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

1 **II. FACTUAL BACKGROUND**

2 PA Lawyer Fund is an independent expenditure-only political committee (“IEOPC”) that  
3 registered with the Commission on October 28, 2022.<sup>8</sup> Mr. Raymond G. Lahoud is both the  
4 Committee’s treasurer and its sole contributor.<sup>9</sup> After receiving the RFAI from RAD, the  
5 Committee refunded its remaining cash on hand of \$500,000 to Mr. Lahoud.<sup>10</sup> The Committee  
6 has no other active or pending referable matters, has one audit point for the 2021-2022 election  
7 cycle, and has no audit points thus far in the 2023-2024 election cycle.<sup>11</sup>

8 On November 18, 2022, the Committee filed its 30-Day Post-General Report that  
9 disclosed eight IEs totaling \$2,500,000.00, all of which were disseminated on November 5,  
10 2022. On March 6, 2023, RAD sent an RFAI to the Committee referencing the 30-Day Post-  
11 General Report.<sup>12</sup> The RFAI noted that the Committee may have failed to file one or more of the  
12 required 24-Hour Reports of IEs.<sup>13</sup> The RFAI included a chart identifying eight IEs, totaling  
13 \$2,500,000, for which a 24-Hour Report had not been timely filed.<sup>14</sup>

14 On May 17, 2023, the Committee filed a Form 99 in response to the RFAI stating that it  
15 had inadvertently failed to file the 24-Hour Report disclosing the IEs.<sup>15</sup> It further stated that it

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<sup>8</sup> PA Lawyer Fund, Statement of Organization (Oct. 28, 2022),  
<https://docquery.fec.gov/pdf/240/202210289546667240/202210289546667240.pdf>.

<sup>9</sup> PA Lawyer Fund, 2023 Mid-Year Report (June 13, 2023),  
<https://docquery.fec.gov/pdf/940/202306139582142940/202306139582142940.pdf>.

<sup>10</sup> *Id.*; PA Lawyer Fund, Request for Additional Info. (“RFAI”) at 1 (Mar. 6, 2023),  
<https://docquery.fec.gov/pdf/167/202303060300175167/202303060300175167.pdf>.

<sup>11</sup> Referral at 1.

<sup>12</sup> PA Lawyer Fund, RFAI at 1 (Mar. 6, 2023),  
<https://docquery.fec.gov/pdf/167/202303060300175167/202303060300175167.pdf>.

<sup>13</sup> *Id.*

<sup>14</sup> *Id.*, Attach. 1.

<sup>15</sup> PA Lawyer Fund, Form 99 (Miscellaneous Text) (May 17, 2023),  
<https://docquery.fec.gov/pdf/969/202305179581533969/202305179581533969.pdf>.

1 had erroneously believed the 24-Hour reporting requirement did not apply and that it had  
2 installed procedures to avoid future violations.<sup>16</sup>

3 On June 8, 2023, the Committee was notified of the referral.<sup>17</sup> On June 13, 2023, the  
4 Committee filed a Response acknowledging its inadvertent failure to timely file the 24-Hour  
5 Report at issue, noting that it responded immediately to the RFAI, and highlighting that it had  
6 installed procedures to avoid future violations.<sup>18</sup> Moreover, the Response asserts that the  
7 Committee had since decided to cease operations, refunded all contributions on May 26, 2023,  
8 and has not since solicited any contributions.<sup>19</sup> Finally, the Committee expressed its intention to  
9 terminate and requests that the Commission dismiss this matter, after which the Committee  
10 intends to file a termination report.<sup>20</sup> The Committee's latest disclosure report, its 2023 Mid-  
11 Year Report, indicates that it has no debts or obligations and an ending cash-on-hand balance of  
12 \$0.<sup>21</sup>

### 13 **III. LEGAL ANALYSIS**

14 Political committees must file periodic reports disclosing their receipts and  
15 disbursements.<sup>22</sup> An independent expenditure is an expenditure that expressly advocates the  
16 election or defeat of a clearly identified federal candidate, and is not made in concert or  
17 cooperation with or at the request of such candidate, the candidate's authorized political

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<sup>16</sup> *Id.*

<sup>17</sup> Notif. Letter (June 8, 2023).

<sup>18</sup> Resp. at 1, 2 (June 13, 2023).

<sup>19</sup> *Id.*; see also PA Lawyer Fund, 2023 Mid-Year Report at 4 (June 13, 2023),  
<https://docquery.fec.gov/pdf/940/202306139582142940/202306139582142940.pdf>.

<sup>20</sup> Resp. at 3.

<sup>21</sup> PA Lawyer Fund, 2023 Mid-Year Report at 2 (June 13, 2023),  
<https://docquery.fec.gov/pdf/940/202306139582142940/202306139582142940.pdf>.

<sup>22</sup> 52 U.S.C. § 30104(a).

1 committee, or their agents.<sup>23</sup> Additionally, committees that make independent expenditures  
2 aggregating \$1,000 or more with respect to a given election after the 20th day, but more than 24  
3 hours before the date of that election, must file a 24-Hour Report to disclose such independent  
4 expenditures by 11:59 p.m. Eastern Standard/Daylight Time on the day following the date on  
5 which a communication is publicly distributed or otherwise publicly disseminated.<sup>24</sup>

6 Here, the independent expenditures were made after the 20th day, but more than 24 hours  
7 before the election,<sup>25</sup> and the aggregate amount was over \$1,000.<sup>26</sup> As such, the Committee was  
8 required to file a 24-Hour Report. However, the Committee failed to do so, and acknowledged  
9 its failure in stating that it did not believe the 24-Hour reporting requirement applied to  
10 IEOPCs.<sup>27</sup>

11 Although the Committee's failure to file was inadvertent, it is still responsible for its  
12 reporting obligations.<sup>28</sup> As such, dismissing this matter would be inappropriate, particularly  
13 given that \$2,500,000 of independent expenditures were not timely disclosed. Consistent with  
14 our recommendations in prior MURs with similar violations,<sup>29</sup> we recommend that the  
15 Commission find reason to believe that PA Lawyer Fund and Raymond G. Lahoud in his official  
16 capacity as treasurer violated 52 U.S.C. § 30104(g)(1) and 11 C.F.R. § 104.4(c).

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<sup>23</sup> *Id.* § 30101(17); *see also* 11 C.F.R. § 100.22(a), (b) (definition of "expressly advocating").

<sup>24</sup> 52 U.S.C. § 30104(g)(1); 11 C.F.R. § 104.4(c).

<sup>25</sup> Referral at 1.

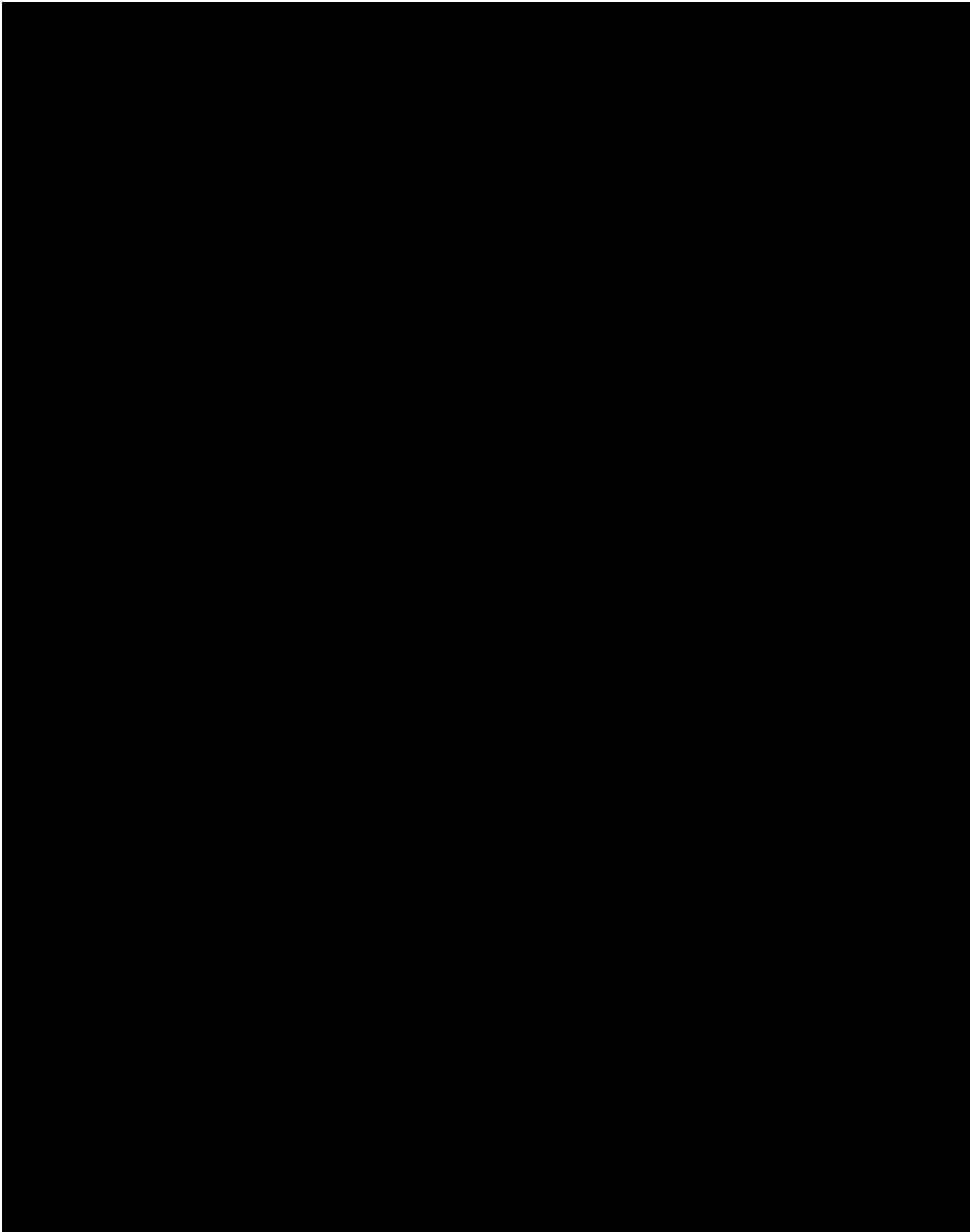
<sup>26</sup> *Id.*

<sup>27</sup> Resp. at 3.

<sup>28</sup> *Supra* note 24.

<sup>29</sup> *See* First General Counsel's Report ("First GCR") at 5-6, MUR 8012 (Black Voters Matter); Certification ("Cert.") (June 9, 2022), MUR 8012 (Black Voters Matter); First GCR at 5, MUR 7436 (Warrior PAC); Cert. (July 18, 2018), MUR 7436 (Warrior PAC); First GCR at 5, MUR 7276 (Right to Rise USA); Cert. (Sept. 13, 2017), MUR 7276 (Right to Rise USA).

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**V. RECOMMENDATIONS**

- 1. Open a Matter Under Review;
- 2. Find reason to believe that PA Lawyer Fund and Raymond G. Lahoud in his official capacity as treasurer violated 52 U.S.C. § 30104(g)(1) and 11 C.F.R. § 104.4(c);
- 3. Enter into conciliation with PA Lawyer Fund and Raymond G. Lahoud in his official capacity as treasurer prior to a finding of probable cause to believe;
- 4. Approve the attached Factual and Legal Analysis;
- 5. Approve the attached Conciliation Agreement; and
- 6. Approve the appropriate letter.

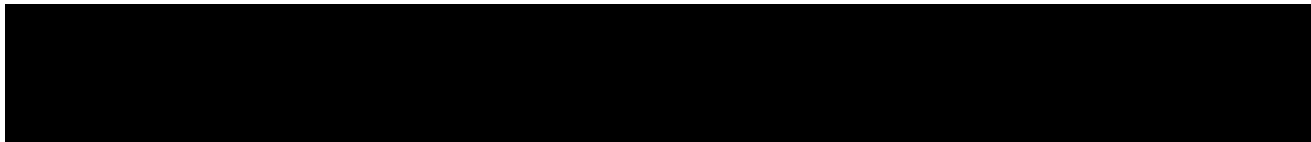
Lisa Stevenson  
Acting General Counsel

Charles Kitcher  
Associate General Counsel  
for Enforcement

1/4/2024  
\_\_\_\_\_  
Date

*Adrienne C. Baranowicz*  
\_\_\_\_\_  
Adrienne Baranowicz  
Associate Deputy General Counsel  
for Enforcement

*Mark Shonkwiler*  
\_\_\_\_\_  
Mark Shonkwiler  
Assistant General Counsel



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Matthew Lupo  
Matthew Lupo  
Attorney

Attachments:

1. Factual and Legal Analysis





**FEDERAL ELECTION COMMISSION****FACTUAL AND LEGAL ANALYSIS**

**RESPONDENT:** PA Lawyer Fund and Raymond G. Lahoud in **MUR** \_\_\_\_\_  
his official capacity as treasurer

**I. INTRODUCTION**

The Reports Analysis Division (“RAD”) referred PA Lawyer Fund and Raymond G. Lahoud in his official capacity as treasurer (the “Committee”) to the Office of General Counsel for failing to timely file one 24-Hour Report to support eight independent expenditures (“IEs”) totaling \$2,500,000.00.<sup>1</sup> On November 18, 2022, the Committee filed its 2022 30-Day Post-General Report that included a Schedule E (Itemized IE) disclosing the eight IEs at issue.<sup>2</sup>

The Committee acknowledges its failure to timely file the required 24-Hour Report, but requests that the Commission dismiss the matter.<sup>3</sup> The Committee argues that it promptly responded to a Request for Additional Information (“RAI”) regarding the missed 24-Hour Report and has implemented procedures to prevent future violations.<sup>4</sup> Furthermore, the Committee asserts that since receiving the RAI, it has ceased operations, refunded its remaining contributions on May 26, 2023, and has not solicited any contributions since that date.<sup>5</sup> The Committee states that it intends to file a termination report once the matter at issue in this RAD Referral is closed.<sup>6</sup>

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1           Despite the Committee’s stated intention to terminate, the circumstances of the violation  
2 do not support dismissal of the matter. Accordingly, the Commission finds reason to believe that  
3 PA Lawyer Fund and Raymond G. Lahoud in his official capacity as treasurer violated 52 U.S.C.  
4 § 30104(g)(1) of the Federal Election Campaign Act of 1971, as amended (the “Act”), and  
5 11 C.F.R. § 104.4(c) of the Commission’s regulations by failing to timely report IEs aggregating  
6 \$1,000 or more made after the 20th day, but more than 24 hours before an election.

## 7 **II. FACTUAL BACKGROUND**

8           PA Lawyer Fund is an independent expenditure-only political committee (“IEOPC”) that  
9 registered with the Commission on October 28, 2022.<sup>7</sup> Mr. Raymond G. Lahoud is both the  
10 Committee’s treasurer and its sole contributor.<sup>8</sup> After receiving the RFAI from RAD, the  
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13 disclosed eight IEs totaling \$2,500,000.00, all of which were disseminated on November 5,  
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3 On May 17, 2023, the Committee filed a Form 99 in response to the RFAI stating that it  
4 had inadvertently failed to file the 24-Hour Report disclosing the IEs.<sup>13</sup> It further stated that it  
5 had erroneously believed the 24-Hour reporting requirement did not apply and that it had  
6 installed procedures to avoid future violations.<sup>14</sup> On May 26, 2023, the Committee refunded its  
7 remaining \$500,000 cash on hand to its sole donor and treasurer, Raymond Lahoud.

8 On June 8, 2023, the Committee was notified of the referral.<sup>15</sup> On June 13, 2023, the  
9 Committee filed a Response acknowledging its failure to timely file the 24-Hour Report at issue,  
10 noting that it responded immediately to the RFAI, and highlighting that it had installed  
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### 3 **III. LEGAL ANALYSIS**

4 Political committees must file periodic reports disclosing their receipts and  
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11 expenditures by 11:59 p.m. Eastern Standard/Daylight Time on the day following the date on  
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<sup>20</sup> 52 U.S.C. § 30104(a).

<sup>21</sup> *Id.* § 30101(17); *see also* 11 C.F.R. § 100.22(a), (b) (definition of “expressly advocating”).

<sup>22</sup> 52 U.S.C. § 30104(g)(1); 11 C.F.R. § 104.4(c).

<sup>23</sup> Referral at 1.

<sup>24</sup> *Id.*

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1           Although the Committee claims that its failure to file was inadvertent, it is still  
2 responsible for its reporting obligations.<sup>26</sup> As such, dismissing this matter would be  
3 inappropriate, particularly given that \$2,500,000 of independent expenditures were not timely  
4 disclosed. Consistent with our findings in prior MURs with similar violations,<sup>27</sup> the Commission  
5 finds reason to believe that PA Lawyer Fund and Raymond G. Lahoud in his official capacity as  
6 treasurer violated 52 U.S.C. § 30104(g)(1) and 11 C.F.R. § 104.4(c).

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<sup>26</sup>           *Supra* note 22.

<sup>27</sup>           *See* Factual & Legal Analysis (“F&LA”) at 3, MUR 8012 (Black Voters Matter); F&LA at 4, MUR 7436 (Warrior PAC); F&LA at 3, MUR 7276 (Right to Rise USA).