



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

April 22, 2024

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Charles Kitcher
Associate General Counsel
for Enforcement

Adrienne Baranowicz
Associate Deputy General Counsel
for Enforcement

BY: Mark Shonkwiler *MS*
Assistant General Counsel

Matthew Lupo *ML*
Attorney

SUBJECT: MUR 8201 (PA Lawyer Fund)
Pre-Probable Cause Conciliation

On January 23, 2024, the Commission found reason to believe that PA Lawyer Fund and Raymond G. Lahoud in his official capacity as treasurer (the “Committee”) violated 52 U.S.C. § 30104(g)(1) and 11 C.F.R. § 104.4(c) by failing to timely file a 24-Hour Report for \$2.5 million of independent expenditures immediately prior to the 2022 election.¹ The Commission authorized the Office of General Counsel to enter into pre-probable cause conciliation with the Committee.² The First General Counsel’s Report noted that the Committee no longer had any remaining cash-on-hand, nor any receipts since the 2022 election.³

¹ Certification (“Cert.”) ¶ 2 (Jan. 24, 2024).

² *Id.* ¶ 3.

³ First Gen. Counsel’s Rpt. (“First GCR”) at 4, MUR 8201 (PA Lawyer Fund).

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11 We believe this negotiated agreement represents a reasonable compromise under the
12 circumstances and satisfies the Commission's enforcement interests. Therefore, we recommend
13 that the Commission accept the attached conciliation agreement and close the file.

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15 **RECOMMENDATIONS:**

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17 1. Accept the attached conciliation agreement with PA Lawyer Fund and Sid Hawach in his
18 official capacity as treasurer;
- 19 2. Approve the appropriate letters; and
- 20 3. Close the file.

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