



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

June 5, 2024

VIA ELECTRONIC MAIL
shawach@norrissecuredmail.com

Sid Hawach, Treasurer
PA Lawyer Fund
2063 Flint Hill Road
Coopersburg, PA 18036

RE: MUR 8201
PA Lawyer Fund and Sid Hawach in his
official capacity as treasurer

Dear Mr. Hawach,

On May 6, 2024, the Federal Election Commission accepted the signed conciliation agreement and civil penalty you submitted in settlement of a violation of 52 U.S.C. § 30104(g)(1), a provision of the Federal Election Campaign Act of 1971, as amended (the "Act"). Accordingly, the file has been closed in this matter, effective today.

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). Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. *See* 52 U.S.C. § 30109(a)(4)(B).

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 694-1650 or mlupo@fec.gov.

Sincerely,

A handwritten signature in cursive script that reads "Matthew Lupo".

Matthew Lupo
Attorney

Enclosure
Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
PA Lawyer Fund and Sid Hawach)	MUR 8201
in his official capacity as treasurer)	

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (the "Commission") pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that PA Lawyer Fund and Sid Hawach in his official capacity as treasurer ("Respondent" or the "Committee") violated 52 U.S.C. § 30104(g)(1) of the Federal Election Campaign Act of 1971, as amended (the "Act"), and 11 C.F.R. § 104.4(c) of the Commission's regulations by failing to timely report independent expenditures ("IEs") aggregating \$1,000 or more made after the 20th day, but more than 24 hours before an election.

NOW, THEREFORE, the Commission and Respondent, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, do hereby agree as follows:

- I. The Commission has jurisdiction over Respondent and the subject matter of this proceeding, and this Agreement has the effect of an agreement entered pursuant to 52 U.S.C. § 30109(a)(4)(A)(i).
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. Respondent enters voluntarily into this Agreement with the Commission.
- IV. The pertinent facts in this matter are as follows:

1. PA Lawyer Fund is an independent expenditure-only political committee that registered with the Commission on October 28, 2022.
 2. Sid Hawach is the current treasurer of PA Lawyer Fund.
 3. Prior to Sid Hawach becoming treasurer in 2024, Raymond G. Lahoud was the treasurer of PA Lawyer Fund.
 4. The Act and Commission regulations require political committees that make independent expenditures aggregating \$1,000 or more with respect to a given election after the 20th day, but more than 24 hours before the date of that election to file a 24-Hour Report to disclose such independent expenditures by 11:59 p.m. Eastern Standard/Daylight Time on the day following the date on which a communication is publicly distributed or otherwise publicly disseminated. 52 U.S.C. § 30104(g)(1); 11 C.F.R. § 104.4(c).
 5. On November 18, 2022, the Committee filed its Post-General Report disclosing eight IEs totaling \$2,500,000.00, which were disseminated on November 5, 2022.
 6. The IEs were made after the 20th day, but more than 24 hours before the election, and the aggregate amounts with respect to each of the candidates were \$1,000 or more.
 7. The Committee did not file a 24-Hour Report for these IEs by 11:59 p.m. Eastern Standard/Daylight Time on the day following the date on which the communication was publicly distributed or otherwise publicly disseminated.
- V. Respondent violated 52 U.S.C. § 30104(g)(1) and 11 C.F.R. § 104.4(c) by failing to file the required 24-Hour Report for IEs totaling \$2,500,000.
- VI. Respondent will take the following actions:

1. Respondent will pay a civil penalty to the Commission in the amount of twenty-five thousand dollars (\$25,000) pursuant to 52 U.S.C. § 30109(a)(5)(A). In ordinary circumstances, the Commission would seek a substantially higher civil penalty based on the violations outlined in this Agreement. However, the Commission is taking into account Respondent's representations that it intends to terminate, is defunct, has no cash on hand, and has limited ability to raise additional funds.

2. Respondent will cease and desist from violating 52 U.S.C. § 30104(g)(1) and 11 C.F.R. § 104.4(c).

VII. The Commission, on request of anyone filing a complaint under 52 U.S.C. § 30109(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This Agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondent shall have no more than 30 days from the date this Agreement becomes effective to comply with and implement the requirements contained in this Agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written Agreement shall be enforceable.

MUR 8201 (PA Lawyer Fund)
Conciliation Agreement
Page 4 of 4

FOR THE COMMISSION:


Lisa J. Stevenson
Acting General Counsel

BY: **Charles Kitcher**
Charles Kitcher
Associate General Counsel
for Enforcement

Digitally signed by
Charles Kitcher
Date: 2024.05.07
10:02:27 -04'00'

5/7/24
Date

FOR THE RESPONDENT:



Sid Hawach
Treasurer for PA Lawyer Fund

04-19-2024
Date