

Office of General Counsel  
 Federal Election Commission  
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OFFICE OF  
 GENERAL COUNSEL

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FEDERAL ELECTION  
 COMMISSION

December 11, 2019

MUR # 7671

This complaint is filed pursuant to 52 U.S.C. 30109, against Big Tent Republicans PAC, Lacy Johnson for Congress, and Anton “Tony” Lazzaro. The undersigned believes that a violation of the Federal Election Campaign Act (“FECA”) has been committed, as explained below.

### The Facts

According to Big Tent Republicans PAC’s website:

Big Tent Republicans PAC was founded by Anton “Tony” Lazzaro as a unique group dedicated to broadening the base and appeal of the Republican Party to a new and diverse generation of Americans. Our goal is to see Republicans win today and win tomorrow. To do that Big Tent Republicans PAC’s is taking the lead in broadening the support of Republican values and support candidates from minority communities to seek elected office at every level of government. Big Tent Republicans proceeds go 100% to Federal candidate campaign committees, and independent expenditures for candidate [sic] we support.<sup>1</sup>

Big Tent Republican PAC’s website states that the PAC is not authorized by any candidate or candidate’s committee.

Big Tent Republicans PAC (FEC ID C00683854) initially registered with the FEC in 2018 as a separate segregated fund (“SSF”), with Big Tent Republicans as its “connected organization.” Big Tent Republicans is registered with the state of Wyoming as a “Profit Corporation – Domestic”, with 50,000 common shares, and the President is Anton Lazzaro.<sup>2</sup>

On July 28, 2019, Big Tent Republican PAC amended its statement of organization to identify itself as a nonconnected committee.

On August 2, 2019, Big Tent Republican PAC once again amended its Form 1, this time adding Lacy Johnson for Congress as a “connected organization” (while checking the box for nonconnected committee type) and added Wells Fargo as an authorized depository.

Lacy Johnson for Congress (FEC ID C00711689) is the principal campaign committee of Lacy Johnson, a candidate in Minnesota’s 5<sup>th</sup> Congressional District. Lacy Johnson for Congress initially filed

<sup>1</sup> <https://www.bigtentRepublicans.org/> (accessed Nov. 12, 2019).

<sup>2</sup> <https://wyobiz.wy.gov/business/FilingDetails.aspx?eFNum=151009206004142105030246171059242179058204241068> (accessed Nov. 12, 2019)

its Form 1 (Statement of Organization) on July 9, 2019. On August 1, 2019, the Committee amended its Form 1 to designate Big Tent Republican PAC as a “connected organization” and added Wells Fargo Bank as a designated depository.

On September 10, 2019, the Federal Election Commission sent the Big Tent Republican PAC a request for additional information (“RFAI”) asking for clarification of the relationship between the PAC and Lacy Johnson for Congress. On December 6, 2019, Big Tent Republican PAC filed a Form 99 purportedly addressing the FEC’s September 10<sup>th</sup> RFAI. In that filing the committee stated, “WE ARE A NON CONNECTED FEDERAL PAC THAT IS ENGAGED WITH LACY JOHNSON FOR CONGRESS IN A JOINT FUNDRAISER.” And in an amended Form 1, the committee identified Lacy Johnson for Congress as “a joint fundraising representative.”

On September 18, 2019, Lacy Johnson for Congress (FEC ID C00711689) transferred \$6,049.73 to Big Tent Republicans PAC, with the stated purpose of ““Transfer: Transfer to Authorized Committee” for the 2020 primary”.

On his Twitter profile, Anton Lazzaro identifies himself as “Volunteer Campaign Mgr for @LacyJohnsnoMN who is running against Ilhan Omar.”<sup>3</sup>

On November 3, 2019, Anton Lazzaro posted the following tweet:



### Questions to Investigate

The FEC should immediately find reason to believe that a violation of FECA has been committed and investigate The Big Tent Republican PAC, Lacy Johnson for Congress, and Tony Lazzaro.

- Did the transfer of \$6,049.73 from Lacy Johnson to Big Tent Republicans PAC violate FECA’s contribution limits? Was the transfer made for a permissible purpose?

<sup>3</sup> <https://twitter.com/GOPtony> (accessed Nov. 12, 2019).

- Did Big Tent Republican PAC and Kerstin Schulz, in her official capacity as treasurer, violate FECA by amending its Form 1 to identify itself as a nonconnected committee?
- Is Big Tent Republican PAC coordinating its activities with Lacy Johnson for Congress?

The FEC should immediately investigate.

Signed,



Christopher Marston

Alexandria, VA 22314

State of Virginia, City of Alexandria

Signed and sworn to before me on 12/11/2019 by Christopher Marston.



Notary Public

Printed Name: ERIC NIELSEN

My Commission Expires, JUNE 30<sup>TH</sup>, 2023.

My Commission Number is 7842037.

