

1 **FEDERAL ELECTION COMMISSION**

2
3 **FIRST GENERAL COUNSEL'S REPORT**

4
5 **MUR 7853**

6 DATE COMPLAINT FILED: 10/20/2020

7 DATE OF NOTIFICATION: 11/10/2020

8 LAST RESPONSE RECEIVED: 12/28/2021

9 DATE ACTIVATED: 05/04/2021

10 EXPIRATION OF SOL: 09/04/2025

11 (earliest)

12 10/22/2025

13 (latest)

14 ELECTION CYCLE: 2020

15
16 **COMPLAINANT:**

Campaign Legal Center

17
18 **RESPONDENTS:**

Lance Harris

Campaign to Elect Lance Harris, and Blaine Hebert
in his official capacity as Treasurer

Lance Harris for Congress, and Lance Harris in his
official capacity as Treasurer

Stand for Truth, Inc., and Hal Lambert in his
official capacity as Treasurer

26
27 **RELEVANT STATUTES**
28 **AND REGULATIONS:**

52 U.S.C. § 30104(b)

52 U.S.C. § 30116(a)(7)(B)

52 U.S.C. § 30118(a)

52 U.S.C. § 30125(e)(1)(A)

11 C.F.R. § 109.20

11 C.F.R. § 109.21

11 C.F.R. § 300.2(c)(2)

11 C.F.R. § 300.61

36
37 **INTERNAL REPORTS CHECKED:**

Disclosure Reports

38
39 **FEDERAL AGENCIES CHECKED:**

None

40
41 **STATE AGENCIES CHECKED:**

Louisiana Board of Ethics

42
43
44
45
46

1 **I. INTRODUCTION**

2
3 Lance Harris, a Louisiana State Representative and 2020 Congressional Candidate
4 reported providing \$120,000 to Stand for Truth, Inc. on September 4, 2020. Stand for Truth, an
5 independent expenditure-only committee, reported the funds as contributions from Campaign to
6 Elect Lance Harris, Harris's state principal campaign committee ("State Committee"). The State
7 Committee provided another \$6,500 on October 22, 2020, which was again reported by Stand for
8 Truth as a contribution.

9 The Complaint alleges that the \$120,00 included non-federal funds and that Stand for
10 Truth's receipt caused it to be "financed" by Harris within the meaning of 52 U.S.C § 30125(e).¹
11 And because Stand for Truth paid for research related to Harris's federal candidacy and made an
12 independent expenditure supporting Harris's federal candidacy shortly after receiving the funds,
13 the Complaint alleges that Harris, the State Committee and Stand for Truth violated the soft
14 money prohibition of the Federal Election Campaign Act of 1971, as amended (the "Act"). The
15 Complaint also alleges that Stand for Truth's spending in support of Harris was coordinated,
16 resulting in Stand for Truth making, and Lance Harris for Congress, Harris's federal principal
17 campaign committee ("Federal Committee") accepting, a prohibited in-kind contribution.

18 Harris, the State Committee, the Federal Committee, and Stand for Truth (collectively,
19 the "Respondents") assert that the State Committee's funding of Stand for Truth was permissible
20 and deny that there was coordination so as to render Stand for Truth's subsequent spending in
21 support of Harris an in-kind contribution.

¹ Complaint at 2 (Oct. 30, 2020). The Complaint did not address the State Committee's October 21, 2020 contribution.

1 For the reasons set forth below, the State Committee and Stand for Truth are entities
2 *established, financed, maintained or controlled* (“EFMC’d”) by Harris and the State Committee
3 within the meaning 52 U.S.C. § 30125(e). Accordingly, we recommend that the Commission find
4 reason to believe Harris and the State Committee violated 52 U.S.C. § 30125(e) by transferring
5 funds not subject to the limitations, prohibitions, and reporting requirements of the Act in
6 connection with an election to Federal office. We further recommend that the Commission find
7 reason to believe Stand for Truth, as an entity EFMC’d by Harris, violated 52 U.S.C. § 30125(e)
8 by receiving and spending those funds in connection with an election to Federal office. To resolve
9 these soft money allegations, we recommend that the Commission authorize pre-probable cause
10 conciliation. With respect to the Federal Committee, the Complaint makes no allegations that it
11 violated 52 U.S.C. § 30125(e) and we have no information to the contrary. Consequently, we
12 recommend that the Commission take no action at this time as to the Federal Committee for the
13 soft money allegations. At the conclusion of the conciliation process, we will make the appropriate
14 recommendation as to the Federal Committee.

15 Alternatively, if the Commission does not find reason to believe that Harris and the State
16 Committee financed Stand for Truth, we recommend that the Commission find reason to believe
17 Stand for Truth made, and the Federal Committee accepted, prohibited in-kind contributions in the
18 form of coordinated expenditures. We also recommend that the Commission find reason to believe
19 that the Federal Committee and Stand for Truth failed to report those in-kind contributions in
20 violation of 52 U.S.C. § 30104(b). To resolve the coordination allegations under our proposed
21 alternative recommendations, we recommend that the Commission take no action at this time as
22 to the Complaint’s allegation that Stand for Truth violated 52 U.S.C. § 30125(e). As described
23 below, an entity EFMC’d by a federal candidate cannot satisfy the payment prong of the

1 Commission's coordinated communication regulation. At the conclusion of the conciliation
2 process, we will make the appropriate recommendations with respect to the Complaint's 52 U.S.C.
3 § 30125(e) allegation against Stand for Truth.

4 **II. FACTUAL BACKGROUND**

5 **A. The State Committee's "Expenditures" to Stand for Truth**

7 Lance Harris has been a member of the Louisiana House of Representatives since 2011.²
8 Campaign to Elect Lance Harris is Harris's state principal campaign committee.³ According to
9 the most recent information on file with the Louisiana Board of Ethics, in 2020, the State
10 Committee received \$3,500.66 in contributions from corporations; \$1,750 from limited liability
11 companies ("LLCs"); \$12,500 from other PACs; and \$500 from individuals, for a total of
12 \$18,250.66.⁴ In 2019, the State Committee received \$13,500 in contributions from corporations,
13 \$20,100 from LLCs, \$22,851 from other PACs, and \$23,940 from individuals for a total of

² Response of Lance Harris, Lance Harris for Congress, and Campaign to Elect Lance Harris and Blaine Hebert, in his official capacity of Treasurer at 1 (Dec. 15, 2020) ("Harris Response"); Louisiana House of Representatives, State Representative Lance Harris, https://house.louisiana.gov/H_Reps/members?ID=25.

³ Candidate's Report, Lance Harris (Feb. 6, 2016), <http://eap.ethics.la.gov/CFSearch/ShowEFormPDF.aspx?ReportID=56810>; Harris Resp. at 2. A financial summary of the State Committee compiled from the available data at the Louisiana Board of Ethics website is attached. *See* Attachment 1.

⁴ Three contributions occurred on October 20, 2020, after the State Committee provided funds to Stand for Truth: a \$1,000 corporate contribution from "Independent Rx" and two \$2,500 contributions from "HOSPAC." *See* Attachment 2 (compilation of the State Committee's contributor data for the previous five years available at the Louisiana Board of Ethics website).

1 \$81,891.00.⁵ Harris's term ends in January 2024.⁶ He has not filed a statement of candidacy for
 2 the 2023 Louisiana elections.⁷

3 On March 3, 2020, Harris announced his federal candidacy to represent Louisiana's Fifth
 4 Congressional District.⁸ He filed his Statement of Candidacy on March 12, 2020.⁹ His principal
 5 campaign committee, Lance Harris for Congress, filed its Statement of Organization on March
 6 12, 2020.¹⁰

7 Stand for Truth incorporated in Delaware on November 16, 2015, and it registered with
 8 the Commission as an independent expenditure-only committee on November 18, 2015.¹¹
 9 According to its website, it was established to "support conservative candidates like Ted Cruz"
 10 and solicited contributions to support Ted Cruz's 2016 presidential bid.¹² Between November
 11 17, 2015, and May 31, 2016, Stand for Truth reported \$11,289,466.83 in total receipts and spent
 12 \$10,864,378.89.¹³ From June 1, 2016, until September 4, 2020, Stand For Truth's fundraising

⁵ *Id.* The reports also show that in 2019 the State Committee received \$500 from Garrett Graves for Congress, \$1,000 from the Jonathan E. Martin Family Trust, and \$250 from Jones Walker LLP. *See id.*

⁶ State Representative Lance Harris, LOUISIANA HOUSE OF REPRESENTATIVES, https://house.louisiana.gov/H_Reps/members?ID=25 (last visited Aug. 27, 2021).

⁷ LOUISIANA SECRETARY OF STATE: Candidate Inquiry, <https://voterportal.sos.la.gov/candidateinquiry> (last visited Aug. 21, 2021) (showing Lance Harris's most recent Notice of Candidacy was filed on August 6, 2019 for the October 12, 2019 primary election).

⁸ Harris Resp. at 1.

⁹ Statement of Candidacy, Lance Harris (Mar. 12, 2020), <https://docquery.fec.gov/pdf/906/202003129203824906/202003129203824906.pdf>.

¹⁰ Statement of Organization, Lance Harris for Congress (Mar. 12, 2020), <https://docquery.fec.gov/pdf/226/202003129203825226/202003129203825226.pdf>.

¹¹ Delaware Dep't of State: Corporation Division, Entity Search (search for "Stand for Truth"), <https://icis.corp.delaware.gov/ecorp/entitysearch/NameSearch.aspx>; Statement of Organization, Stand for Truth, Inc. (Nov. 18, 2018), <https://www.fec.gov/data/committee/C00592337/?tab=filings&cycle=2016#statements>.

¹² *Internet Archive*, WAYBACK MACHINE, <https://web.archive.org/web/20151214235431/http://standfortruthpac.com/>.

¹³ *See* Attachment 3 (compiled financial summary of Stand for Truth from reports filed with the Commission). The last contribution during this period was received on May 16, 2016. *See* June 2016 Monthly

1 came to a virtual standstill, reporting no receipts and two refunds totaling \$838.50.¹⁴ From
 2 March 3, 2016, until September 4, 2020, Stand for Truth made no independent expenditures.¹⁵
 3 On July 1, 2020, its cash-on-hand had fallen to \$5,639.20.¹⁶

4 On September 4, 2020 the State Committee reported a \$120,000 “expenditure” to Stand
 5 for Truth for “Independent Expenditure PAC.”¹⁷ Five days later, Stand for Truth paid Go BIG
 6 Media, a Virginia-based media firm, \$12,500 for “research” relating to Harris.¹⁸ Then, on
 7 September 24, 2020, Stand for Truth paid Go BIG Media \$89,500 for a television advertisement
 8 supporting Harris, its first independent expenditure since March 11, 2016.¹⁹ On October 22,
 9 2020, Stand for Truth received another \$6,500 from the State Committee.²⁰ During the entire

Report, Stand for Truth (June 20, 2016),
<https://docquery.fec.gov/pdf/999/201606209018570999/201606209018570999.pdf>.

¹⁴ See Attach. 3. Ted Cruz, the candidate Stand for Truth was established to support, dropped out of the 2016 presidential race in May 2016. See Katie Glueck and Shane Goldmacher, *Ted Cruz drops out of presidential race*, POLITICO (May 3, 2016), <https://www.politico.com/story/2016/05/ted-cruz-drops-out-of-presidential-race-222763>.

¹⁵ See *FEC Independent Expenditures: Filtered Results*, FEC.GOV, https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00592337&is_notice=true&most_recent=true (last visited Aug. 24, 2021).

¹⁶ Attach. 3; October 2020 Quarterly Report, Stand for Truth (Oct. 15, 2020), <https://docquery.fec.gov/pdf/918/202010159294585918/202010159294585918.pdf>.

¹⁷ Candidate's Report, Lance Harris (Feb. 5, 2021), <https://www.ethics.la.gov/CampaignFinanceSearch/ShowEForm.aspx?ReportID=95431>; Attachment 4 (compilation of expenditures by Lance Harris from data on Louisiana Board of Ethics website). On the receiving end, Stand for Truth reported the same amount received as a contribution from the State Committee. October 2020 Quarterly Report, Stand for Truth (Oct. 15, 2020), <https://docquery.fec.gov/pdf/918/202010159294585918/202010159294585918.pdf>.

¹⁸ October 2020 Quarterly Report, Stand for Truth (Oct. 15, 2020), <https://docquery.fec.gov/pdf/918/202010159294585918/202010159294585918.pdf>.

¹⁹ *Id.*; 48-Hour Report, Stand for Truth (Oct. 7, 2020), <https://www.fec.gov/data/committee/C00592337/?tab=filings&cycle=2020>. The ad was publicly distributed/disseminated on October 6, 2020.

²⁰ Post-General Report 2020, Stand for Truth (Dec. 3, 2020), <https://docquery.fec.gov/pdf/048/202012039338360048/202012039338360048.pdf>. Stand for Truth reported having received the \$6,500 on October 22, 2020, but the State Committee reported its \$6,500 “expenditure” to Stand for Truth as having occurred on October 21, 2020. Candidate's Report, Lance Harris (Feb. 5, 2021), <https://www.ethics.la.gov/CampaignFinanceSearch/ShowEForm.aspx?ReportID=95431>.

1 2020 election cycle, Stand for Truth's only contributions came from the State Committee and its
2 only independent expenditure was the \$89,500 spent in support of Harris.

3 **B. The Complaint and Responses**
4

5 Based on the timeline of events concerning the State Committee's transfer of funds to
6 Stand for Truth and Stand for Truth's subsequent spending of funds in support of Harris's federal
7 candidacy, the Complaint alleges that respondents violated the Act in a number of ways. *First*,
8 the Complaint alleges that Harris and the State Committee transferred non-federal funds in
9 violation of the Act's soft money ban.²¹ In support, the Complaint relies upon the fact that Stand
10 for Truth had less than \$6,000 cash-on-hand when the State Committee contributed \$120,000.²²
11 As a result, the Complaint alleges that the Harris and the State Committee violated 52 U.S.C. §
12 30125(e) by transferring funds not subject to the limitations, prohibitions, and reporting
13 requirements of the Act (i.e., "non-federal funds").²³ *Second*, the Complaint alleges that Stand
14 for Truth, as an entity financed by Harris, violated 52 U.S.C. § 30125(e) by receiving and
15 spending those non-federal funds.²⁴ *Third*, the Complaint alleges that Stand for Truth made, and
16 the Federal Committee accepted, prohibited and unreported in-kind contributions because Stand
17 for Truth's reported research related to Harris (\$12,500) and television advertisement supporting
18 Harris (\$89,500) were coordinated with Harris or his agents via the use of Go BIG Media, a
19 common vendor.²⁵

²¹ Compl. at 6.

²² *Id.* at 2, 6-7.

²³ *Id.* at 6-7 ("Count I"); *see also* 11 C.F.R. § 300.2(k) (defining "Non-Federal funds").

²⁴ Compl. at 8-9 ("Count II").

²⁵ *Id.* at 9-16 ("Count III"; "Count IV"; "Count V").

1 The Commission received a joint response from Harris, the State Committee, and the
2 Federal Committee (“Harris Response”). The Harris Response denies that the State Committee
3 EFMC’d Stand for Truth. The Harris Response claims Harris was “not involved with the State
4 Campaign” and had “no decision-making role” regarding its spending after March 12, 2020, the
5 date of filing his Statement of Candidacy for federal office.²⁶ As a result, the Harris Response
6 says that the State Committee independently made a contribution to Stand for Truth as part of the
7 “process of winding down its operations.”²⁷ The Harris Response asserts that the State
8 Committee’s \$120,000 contribution constituted “roughly 1% of all funds received by Stand for
9 Truth.”²⁸ Assuming *arguendo* that Harris did control the State Committee, it argues such a small
10 percentage does not qualify as providing funds “in a significant amount” under the
11 Commission’s regulation for determining if an entity is EFMC’d by a candidate.²⁹ Second, the
12 Harris Response denies that the Federal Committee coordinated any expenditure or
13 communication with Stand for Truth through the use of a common vendor, Go BIG Media. It
14 claims that under the Federal Committee’s agreement with Go BIG Media, Go BIG Media was
15 responsible for “implementing and adhering to an internal firewall policy,” preventing the sort of
16 coordination the Complaint alleged.³⁰ The Harris Response also states that the Complaint failed
17 to provide evidence that Go BIG Media conveyed any information about Harris’s plans, projects,
18 activities, or needs material to the creation, production, or distribution of Stand for Truth’s

²⁶ Harris Resp. at 2.

²⁷ *Id.* at 1.

²⁸ *Id.* at 3.

²⁹ *Id.*

³⁰ *Id.* at 4.

1 communication.³¹ The Harris Response does not include a copy of its agreement with Go BIG
2 Media.

3 Stand for Truth's response makes three points.³² First, it denies making a coordinated
4 communication and asserts that there is no evidence that it did so. Instead, Stand for Truth
5 argues that the Complaint's allegations are "conclusory" and interpreted so to fit the
6 Complainant's narrative.³³ Their Response also states that Go BIG Media had adopted and
7 implemented a firewall policy to prevent the sharing of material information, but did not provide
8 a copy of the policy.³⁴ Second, Stand for Truth denies that it was EFMC'd by Harris or his
9 *Federal* Committee and argues that the Complaint's allegations are based on speculation.³⁵
10 Stand for Truth's Response states that the Complaint gives no evidence that Lance Harris himself
11 arranged for the funds to be contributed to Stand for Truth and argues that it is not surprising that
12 someone involved in a past election committee would independently want to support the
13 candidate again in the future.³⁶ Finally, Stand for Truth argues that because it had other
14 individual contributors, its receipt of the State Committee's one-time "donation" is insufficient to
15 establish that Harris controls Stand for Truth.³⁷

³¹ *Id.*

³² Stand for Truth requested and received an extension of time to submit its response. In its request for an extension it represented that it sought additional time to, among other things, "procure affidavits." Eric Lycan email to Kristina Portner (Dec. 20, 2020). Stand for Truth did not include any affidavits in its response.

³³ Stand for Truth Resp. at 2.

³⁴ *Id.* at 3.

³⁵ *Id.* at 4.

³⁶ *Id.*

³⁷ *Id.* at 5.

1 **III. LEGAL ANALYSIS**

2
3 **A. The Commission Should Find Reason to Believe that Respondents Violated**
4 **the Soft Money Prohibition of the Act**

5
6 1. Legal Standard

7
8 The Act and Commission regulations prohibit candidates, individuals holding Federal
9 office, agents of a candidate or an individual holding Federal office, or an entity directly or
10 indirectly *established, financed, maintained, or controlled* by or acting on behalf of one or more
11 candidates or individuals holding Federal office from “solicit[ing], receiv[ing], direct[ing],
12 transfer[ing], or spend[ing] funds in connection with an election for Federal office, including
13 funds for any Federal election activity, unless the funds are subject to the limitations,
14 prohibitions, and reporting requirements of this Act.”³⁸

15 This prohibition reinforces 52 U.S.C § 30125(a)³⁹ by preventing federal candidates and
16 officeholders — who controlled the national committees of the political parties — from
17 circumventing the prohibitions applying to national committees by controlling ostensibly
18 separate entities that could accept and spend non-federal funds.⁴⁰

19 The Commission defines the phrase *established, financed, maintained or controlled* by
20 examining a non-exhaustive list of ten affiliation factors set forth in 11 C.F.R. § 300.2(c)(2).
21 The factors “must be examined in the context of the overall relationship between the [candidate]

³⁸ 52 U.S.C § 30125(e)(1); 11 C.F.R. § 300.61.

³⁹ *See McConnell v. FEC*, 540 U.S. 93, 133 (2003) (“The remaining provisions of new FECA § 323 largely reinforce the restrictions in § 323(a)”).

⁴⁰ *See id.* at 121, 133.

1 and the entity to determine whether the presence of any factor or factors is evidence that the
 2 [candidate] directly or indirectly [EFMC'd] the entity.”⁴¹ The ten factors are:

- 3
 4 (i) A controlling interest in an entity's voting stock or securities;
 5 (ii) Authority or ability to direct or participate in the governance of the entity,
 6 “formal or informal;”
 7 (iii) Authority or ability to hire, appoint, demote, or otherwise control an
 8 entity's officers or other decision-making employees or members;
 9 (iv) Common or overlapping members with an entity;
 10 (v) Common or overlapping officers or employees with an entity;
 11 (vi) Having members, officers, or employees who were former members,
 12 officers, or employees of an entity;
 13 (vii) Providing an entity “funds or goods in a significant amount or on an
 14 ongoing basis” such as through direct and indirect payments for
 15 administrative, fundraising, or other costs;
 16 (viii) Causing or arranging “funds or goods in a significant amount or on an
 17 ongoing basis” to be provided to an entity;
 18 (ix) Having “an active or significant role in the formation of an entity;”
 19 (x) Similar patterns of receipts or disbursements with an entity.⁴²

20
 21 2. Harris and the State Committee Appear to Have Financed Stand for Truth
 22 with Non-Federal Funds

23
 24 The Commission has determined that a state campaign committee of a federal candidate
 25 is, as a matter of law, EFMC'd by the federal candidate and is acting on the candidate's behalf.⁴³

⁴¹ See 11 C.F.R. § 300.2(c); Prohibited and Excessive Contributions: Non-Federal Funds or Soft Money, Final Rules, 67 Fed. Reg. 49064, 49084 (July 29, 2002).

⁴² 11 C.F.R. § 300.2(c). In promulgating the rule which defines “EFMC” the Commission “recast” the existing affiliation factors found at 11 C.F.R. § 100.5(g)(4)(ii) in order to apply the existing affiliation concepts in a different context. Prohibited and Excessive Contributions: Non-Federal Funds or Soft Money, 67 Fed. Reg. 49064, 49084 (July 29, 2002). Committees that are affiliated, that is, committees that are established, financed, maintained, or controlled by the same corporation, labor organization, person or group of persons, share a single limitation on the amount they can accept from any one contributor. 11 C.F.R. §§ 100.5(g), 110.3(a)(1), 110.3(a)(3)(ii).

⁴³ See Factual & Legal Analysis at 6, MUR 7337 (Debbie Lesko and Re-Elect Debbie Lesko for Senate) (citing Advisory Opinion 2009-26 at 5 (Coulson) and Advisory Opinion 2007-26 at 4 (Schock)) *see also* Factual & Legal Analysis at 9, MUR 6601 (Oelrich for Congress) (citing same advisory opinions). The Harris Response claims Harris's association with the State Committee ended on March 12, 2020 and argues that a federal candidate's pre-candidacy association with an organization does not “taint the independence” of that organization's subsequent expenditures. Harris Resp. at 2 (citing Statement of Reasons of Vice Chairman Matthew S. Petersen and Commissioner Caroline C. Hunter at 4, MURs 6789/6852 (Special Operations for America, *et al.*) and Statement of Reasons of Vice Chairman Matthew S. Petersen and Commissioner Caroline C. Hunter at 8, MUR 6928 (Richard John “Rick” Santorum, *et al.*)). The two Statements of Reasons cited do not bind the Commission. *See CREW v.*

1 Accordingly, Harris, a federal candidate, EFMC'd the State Committee. Because Harris
2 EFMC'd the State Committee, any funds the State Committee solicited, received, directed,
3 transferred, or spent in connection with a federal election after Harris became a federal candidate
4 were required to be federally permissible.⁴⁴

5 The State Committee's disclosure reports reveal that it accepted contributions from
6 corporations. Since 2016, the State Committee accepted a total of \$53,851.37 from PACs,
7 \$30,251.32 from corporations, \$25,690 from individuals, \$23,050 from LLCs whose tax status is
8 unknown, \$1,000 from a family trust, \$500 from a federal campaign committee, and \$250 from a
9 partnership.⁴⁵ Thus, it appears that some portion of the funds provided to the Stand for Truth
10 after Harris became a federal candidate were funds that did not comply with the Act's source
11 prohibitions.⁴⁶

12 The key factor in determining whether Harris financed Stand for Truth turns on whether
13 the State Committee provided funds in a "significant amount or on an ongoing basis" to Stand
14 for Truth.⁴⁷ The determination of whether an amount is "significant" under 11 C.F.R.

FEC, 380 F. Supp. 3d 30, 43 (D.D.C. 2019) (statement of two Commissioners "cannot control the FEC's actions unless it is adopted by more Commissioners."), *aff'd* 993 F.3d 880 (D.C. Cir. 2021); *Campaign Legal Center v. FEC*, 312 F. Supp. 3d 153, 166 (D.D.C. 2018) ("reasoning of the three Commissioners . . . [is] 'not [] binding legal precedent or authority for future cases.'") (quoting *Common Cause v. FEC*, 842 F.2d 436, 449 n.32 (D.C. Cir. 1988)). And in any case, the Harris Response's denial that Harris associated with the State Committee post-federal candidacy is inconsistent with his own state filings, which shows Harris signed the state Candidate Report covering the January-December 2020 time period which disclosed the \$120,000 expenditure to Stand for Truth. *See* Candidate's Report, Lance Harris (Feb. 5, 2021), <https://www.ethics.la.gov/CampaignFinanceSearch/ShowEForm.aspx?ReportID=95431>.

⁴⁴ Advisory Opinion 2003-32 at 4 (Tenenbaum) (funds in federal candidate's state campaign account that were not raised in accordance with the contribution limits and source prohibitions of the Act cannot be donated to an organization whose primary purpose is federal election activity).

⁴⁵ *See* Attach. 2.

⁴⁶ *See* Factual & Legal Analysis at 4, MUR 6985 (Zeldin for Senate, *et al.*) (describing sources of federal candidate's state committee funds and determining that "some portion . . . were funds that did not comply with the Act's amount limitations and source prohibitions.").

⁴⁷ 11 C.F.R. § 300.2(c)(2)(vii).

1 § 300.2(c)(2)(vii) may be dependent to some extent on what percentage of the entity's total
2 receipts the funding represents.⁴⁸ The Commission has explained that providing amounts that
3 are so large or comprise a substantial percentage of an entity's receipts would qualify as being a
4 "significant amount."⁴⁹

5 Whether funds provided to an entity qualify as "significant" under 11 C.F.R. §
6 300.2(c)(2)(vii) and whether the receiving entity should, in turn, be considered to have been
7 EFMC'd by a candidate or officeholder is determined by the Commission "on a case-by-case
8 basis and in view of all the relevant circumstances."⁵⁰ For example, in AO 2006-04, the
9 Commission determined that a federal candidate's proposed donation to a state ballot-initiative
10 committee that would constitute 50% of the committee's total receipts at the time of the donation
11 "must be considered 'a significant amount'" under 11 C.F.R. § 300.2(c)(vii) such that the federal
12 candidate "financed" the state committee.⁵¹ In considering whether a donation of 25% (up to
13 \$50,000) of the organization's total receipts at the time of the donation would constitute "a
14 significant amount," the Commission said that the donation "must be examined in the context of
15 the overall relationship" between the committee and the entity.⁵² In this analysis, the
16 Commission considered the impact of "seed money" to be important in the context of the overall
17 relationship and the question of whether the entity was financed under the Act. The Commission

⁴⁸ Factual & Legal Analysis at 7, MUR 7337 (Debbie Lesko and Re-Elect Debbie Lesko for Senate) (citing Advisory Opinion 2004-29 at n.4 (Akin) and Advisory Opinion 2004-25 at 4 (Corzine))

⁴⁹ *Id.*

⁵⁰ See Advisory Opinion 2006-04 at 4 (Tancredo) ("AO 2006-04") (contextual factors considered by the Commission in determining that "at the time of the donation" 25% funding was a "significant amount" included the fact that funds provided by Tancredo's committee would be used as "seed money" for the ballot initiative committee); Prohibited and Excessive Contributions: Non-Federal Funds or Soft Money, 67 Fed. Reg. 49064, 49084 (July 29, 2002).

⁵¹ AO 2006-04 at 4.

⁵² *Id.*

1 concluded that a donation of up to \$50,000 when the entity had just a little more than \$9,000
2 “would represent substantial ‘seed money’ for [the entity] and would result in [the entity]
3 depending in large part on [the candidate] for its initial existence.”⁵³

4 In the enforcement context, the Commission also considers the various facts and
5 circumstances of a particular matter in analyzing whether an entity was financed within the
6 meaning of section 300.2(c)(2)(vii). In MUR 7337, the Commission found reason to believe that
7 a \$50,000 contribution from a federal candidate’s state committee which comprised ninety-nine
8 percent of an independent expenditure-only committee’s total receipts constituted a “significant
9 amount.”⁵⁴ In MUR 6753, the Commission exercised its prosecutorial discretion and dismissed
10 the alleged soft money violation where the candidate committee’s \$10,000 donation to an
11 independent expenditure-only political committee constituted two-thirds of the committee’s total
12 funds received during its first six months.⁵⁵ In MUR 5367, the Commission determined that
13 Darrell Issa’s provision — both individually and *through an organization* he controlled with his
14 spouse — of more than \$1.76 million (over 60% of the receipts) to a state ballot measure
15 committee, constituted a “significant amount.”⁵⁶

16 Instead of a strict lifetime receipts-only rule as advocated by the Harris Response, the
17 Commission’s regulation envisages a “situation-specific approach.”⁵⁷ Here, when examined in

⁵³ *Id.*

⁵⁴ *See* Factual & Legal Analysis at 7, MUR 7337 (Debbie Lesko and Re-Elect Debbie Lesko for Senate).

⁵⁵ *See* Factual & Legal Analysis at 3-5, MUR 6753 (People for Pearce). The Commission’s Factual and Legal Analysis noted the low dollar amount, the fact that the \$10,000 contribution was refunded before the complaint was filed, and that the recipient committee only spent funds on “non-substantive administrative expenses” prior to refunding the money. *Id.* at 5.

⁵⁶ *See* Factual & Legal Analysis at 4-8, MUR 5367 (Rescue California). Issa also contributed all of the committee’s “seed money.” *Id.* at 4-5.

⁵⁷ Prohibited and Excessive Contributions: Non-Federal Funds or Soft Money, 67 Fed. Reg. 49064, 49084 (July 29, 2002).

1 the context of the overall relationship between Harris, the State Committee, and Stand for Truth,
2 the record indicates that the State Committee's provision of \$126,500 qualifies as a "significant
3 amount" under 11 C.F.R. § 300.2(c)(2)(vii). Although Stand for Truth was first established in
4 2015 and received over \$11 million in contributions through May 2016, Stand for Truth raised
5 no funds over a four-year period from June 2016, until September 4, 2020, and was largely a
6 dormant organization by 2018, reporting no receipts and only \$2,543 in disbursements for legal
7 fees that year. And from July 1, 2020, until September 4, 2020, Stand for Truth's cash-on-hand
8 was only \$5,639.20.⁵⁸ Thus, the State Committee's provision of \$120,000 on September 4,
9 2020, represented 95.5% of Stand for Truth's total receipts at that time.⁵⁹ The State Committee's
10 additional \$6,500 contribution on October 22, 2020 only increases the proportion. In fact, the
11 State Committee's contributions were the only contributions that Stand for Truth received since
12 2016.⁶⁰ And for the entire 2020 election cycle, the only independent expenditure that Stand for
13 Truth made was the \$89,000 ad supporting Harris, which was funded by the State Committee.⁶¹

14 The Harris Response's argument that the \$120,000 provided by the State Committee to
15 Stand for Truth is "not enough to 'finance' a political committee"⁶² in light of Stand for Truth's
16 lifetime receipts of more than \$11 million is not supported by the regulation or Commission

⁵⁸ See Attach. 3.

⁵⁹ It is true that here, unlike in MUR 7337, the State Committee's funding of Stand for Truth represented a small amount of Stand for Truth's *lifetime* receipts. See Factual & Legal Analysis at 7, MUR 7337 (Debbie Lesko and Re-Elect Debbie Lesko for Senate) But under the Commission's "situation-specific" test, that difference is immaterial because, as stated above, the State Committee was Stand for Truth's sole source of recent financial support at a time when Stand for Truth had less than \$6,000. Because the State Committee was the sole source of financial support for Stand for Truth in the 2020 election cycle, the facts of this more closely resemble prior enforcement matters and advisory opinions involving the provision of "seed money." See, e.g., AO 2006-04 at 4 (Tancredo); First Gen. Counsel's Rpt. at 10, MUR 7006 (Heaney for Congress, *et al.*).

⁶⁰ See Attach. 3. Stand for Truth did receive two refunds totaling \$838.50 between June 1, 2016 and September 4, 2020.

⁶¹ See *id.*

⁶² See Harris Resp. at 3.

1 interpretations. The Commission has never established a funding floor, either in terms of dollar
2 amount or percentage of receipts, under which an organization will be deemed *per se* not to have
3 been financed by another entity. Indeed, when the Commission promulgated 11 C.F.R.
4 § 300.2(c)(2)(vii), it rejected carving out a \$5,000 *de minimis* exception as contrary to the
5 regulation and plain meaning of the Act.⁶³ And, clearly, \$120,000 is much more than the
6 proposed and rejected \$5,000 exception. Nor has Commission established a specific timeframe
7 for considering whether an organization is financed under 11 C.F.R. § 300.2(c)(2)(vii). The fact
8 that a sponsor may request a Commission determination that it is *no longer* deemed to finance an
9 entity demonstrates that the Commission recognized that at different times different relationships
10 may exist.⁶⁴

11 In addition to being contrary to the regulation's situation-specific approach, analyzing
12 whether funds provided to an entity are "significant" only by looking at whether an entity was
13 already active or measuring the percentage such funds represent of the entity's total *lifetime*
14 receipts would allow party committees, candidates, and officeholders to easily circumvent the
15 Act's amount limitations and source prohibitions in connection with federal elections. Indeed,
16 that appears to be exactly what occurred here. The State Committee held non-federal funds and
17 could not transfer those funds directly to the Federal Committee.⁶⁵ Nor could the State
18 Committee, which held non-federal funds, directly or indirectly spend those funds in support of

⁶³ Prohibited and Excessive Contributions: Non-Federal Funds or Soft Money, 67 Fed. Reg. 49064, 49084 (July 29, 2002).

⁶⁴ See 11 C.F.R. § 300.2(c)(4).

⁶⁵ See 11 C.F.R. § 110.3(d) ("Transfers of funds or assets from a candidate's campaign committee or account for a nonfederal election to his or her principal campaign committee or other authorized committee for a federal election are prohibited.").

1 Harris's federal candidacy.⁶⁶ Instead, the State Committee, for the first time in its existence,
2 provided \$120,000 to an independent expenditure-only committee that in short order spent
3 \$102,000 (85%) supporting Harris's federal candidacy. Far from severing the link between
4 federal candidates and non-federal funds, interpreting "significant amount" only in terms of an
5 entity's total *lifetime* receipts would work the opposite result of what Congress intended in
6 passing the Bipartisan Campaign Reform Act.⁶⁷ These facts, when taken together, and coupled
7 with the information described above, sufficiently indicate at the preliminary stage of
8 administrative enforcement that Harris and the State Committee "financed" Stand for Truth
9 within the meaning of the Act and Commission regulations.⁶⁸

10 In sum, the State Committee was EFMC'd by Harris, and at this stage, the information
11 indicates that the State Committee financed Stand for Truth because its provision of \$126,500 to
12 Stand for Truth qualifies as a "significant amount" under 11 C.F.R. § 300.2(c)(2)(vii). Because
13 the \$126,500 appears to include non-federal funds not subject to the reporting requirements of
14 the Act and was transferred by Harris and the State Committee in connection with an election for
15 Federal office, we recommend that the Commission find reason to believe that Harris and the
16 State Committee violated 52 U.S.C. § 30125(e)(1)(A). And because Stand for Truth received

⁶⁶ See 52 U.S.C. § 30125(e)(1)(A); 11 C.F.R. § 300.61; *see also* Factual & Legal Analysis at 6, MUR 7337 (Debbie Lesko and Re-Elect Debbie Lesko for Senate)

⁶⁷ See *McConnell*, 540 U.S. at 100-101 (ban on soft money contributions to federal candidates "sever[s] the most direct link to the soft-money donor"); *id.* at 181 ("[52 U.S.C. § 30125(e)(1)(A)] prohibits federal candidates and officeholders from 'solicit[ing], receiv[ing], direct[ing], transfer[ing], or spend[ing]' any soft money in connection with federal elections.") (emphasis added).

⁶⁸ See Statement of Policy Regarding Commission Act in Matters at the Initial Stage in the Enforcement Process, 72 Fed. Reg. 12545 (Mar. 16, 2007) ("Commission 'reason to believe' findings have caused confusion in the past because they have been viewed as definitive determinations that a respondent violated the Act. In fact, 'reason to believe' findings indicate only that the Commission found sufficient legal justification to open an investigation to determine whether a violation of the Act has occurred.").

1 and spent the funds in connection with an election for Federal office, we recommend that the
 2 Commission find reason to believe that Stand for Truth violated 52 U.S.C. § 30125(e)(1)(A).

3 **B. In the Alternative, the Commission Should Find Reason to Believe that Stand**
 4 **for Truth Made, and the Federal Committee Accepted, Prohibited In-Kind**
 5 **Contributions in the Form of Coordinated Expenditures that Were Not**
 6 **Reported**

7
 8 1. Legal Standard and Reporting Requirements
 9

10 The Act treats expenditures made “in cooperation, consultation, or concert, with, or at the
 11 request or suggestion of, a candidate, his [or her] authorized political committees, or their
 12 agents” as in-kind contributions to that candidate.⁶⁹ Independent expenditure-only committees
 13 are prohibited from making contributions to candidates and their authorized committees.⁷⁰
 14 Further, it is unlawful for candidates and political committees to knowingly accept a prohibited
 15 or excessive contribution.⁷¹

16 Expenditures for “coordinated communications” are addressed under a three-prong test at
 17 11 C.F.R. § 109.21 and other coordinated expenditures are addressed under 11 C.F.R.
 18 § 109.20(b). The Commission has explained that section 109.20(b) applies to “expenditures that
 19 are not made for communications but that are coordinated with a candidate, authorized
 20 committee, or political party committee.”⁷² Under the three-prong test for coordinated
 21 communications, a communication is coordinated and treated as an in-kind contribution when
 22 (1) the communication is paid for, partly or entirely, by a person other than the candidate,
 23 authorized committee, political party committee, or agent thereof; (2) the communication

⁶⁹ 52 U.S.C. § 30116(a)(7)(B).

⁷⁰ See 52 U.S.C. §§ 30116(a); 30118(a); Advisory Opinion 2010-11 at 2-3 (Commonsense Ten).

⁷¹ See 52 U.S.C. §§ 30116(a); 30118(a).

⁷² Coordinated and Independent Expenditures, 68 Fed. Reg. 421, 425 (Jan. 3, 2003) (“2003 Coordination E&J”); see also Advisory Opinion 2011-14 (Utah Bankers Association).

1 satisfies at least one of the “content standards” at 11 C.F.R. § 109.21(c); and (3) the
 2 communication satisfies at least one of the “conduct standards” at 11 C.F.R. § 109.21(d).⁷³ All
 3 three prongs must be satisfied for a communication to be considered coordinated under the
 4 regulations. Agreement or formal collaboration is not required for a communication to be a
 5 coordinated communication.⁷⁴

6 In contrast to a coordinated expenditure, an independent expenditure is an expenditure by
 7 a person “expressly advocating the election or defeat of a clearly identified candidate . . . that is
 8 not made in concert or cooperation with or at the request or suggestion of such candidate, the
 9 candidate’s authorized political committee, or their agents, or a political party committee or its
 10 agents.”⁷⁵

11 Political committees must report contributions made and received.⁷⁶ Authorized
 12 committees are required to report, among other things, contributions from other political
 13 committees, including in-kind contributions, along with the date and amount of the
 14 contribution.⁷⁷ In-kind contributions in the form of coordinated expenditures made by an

⁷³ The six types of conduct that satisfy the conduct prong are: (1) request or suggestion; (2) material involvement; (3) substantial discussion; (4) use of a common vendor; (5) use of a former employee or independent contractor; and (6) republication of campaign material. 11 C.F.R. § 109.21(d)(1)-(6).

⁷⁴ Bipartisan Campaign Reform Act of 2002, Pub. L. No. 107-155, § 214(c), 116 Stat. 81, 95 (2002) (“The [Commission’s] regulations shall not require agreement or formal collaboration to establish coordination.”); 11 C.F.R. § 109.21(e) (“Agreement or formal collaboration between the person paying for the communication and the candidate clearly identified in the communication . . . is not required for a communication to be a coordinated communication.”).

⁷⁵ 52 U.S.C. § 30101(17); 11 C.F.R. § 100.16.

⁷⁶ *See* 52 U.S.C. § 30104(b).

⁷⁷ *Id.* at § 30104(b)(2)-(3); 11 C.F.R. § 100.52(d)(1) (term “anything of value” in the Act’s definition of contribution includes all in-kind contributions); 11 C.F.R. §§ 109.20, 109.21 (coordinated expenditures and coordinated communications treated as in-kind contributions and must also be reported as an expenditures).

1 unauthorized committee to a candidate must be reported by the unauthorized committee along
 2 with the date, amount, and the recipient candidate committee's name and address.⁷⁸

3 2. Stand for Truth's Payment for an Advertisement Supporting Harris
 4 Appears to be a Coordinated Communication⁷⁹
 5

6 The Commission has determined that a communication by a committee that has been
 7 EFMC'd by a federal candidate does not satisfy the payment prong of the Commission's
 8 coordinated communication regulation.⁸⁰ Thus, in the event that the Commission finds reason to
 9 believe that Harris financed Stand for Truth, then Stand for Truth's payment for the television
 10 advertisement supporting Harris could not satisfy the payment prong of the test for coordinated
 11 communications. However, if the Commission does *not* find that Harris financed Stand for
 12 Truth, we make alternative recommendations that the Commission should find reason to believe
 13 that Stand for Truth's payment for the television advertisement constitutes a coordinated
 14 communication and that Stand for Truth made, and the Federal Committee accepted, a prohibited
 15 in-kind contribution.

16 a. The Payment and Content Prongs
 17

18 First, because Stand for Truth, a third party, paid for the communication at issue, it met
 19 the payment prong. Second, Stand for Truth reported the costs for the television advertisement

⁷⁸ See 52 U.S.C. § 30104(b)(4)(H), (b)(6)(B)(i); 11 C.F.R. § 104.3(b)(1), (3).

⁷⁹ The Commission has previously made alternative reason to believe findings when the circumstances warrant. See, e.g., Factual & Legal Analysis, MUR 5534 (Business Alaska, Inc., *et al.*); Factual & Legal Analysis at 6, MUR 5492 (Freedom, Inc.); Factual & Legal Analysis at 4, MUR 5428 (Republican Party of Arkansas); Factual & Legal Analysis at 35, MUR 5365 (Club for Growth, Inc. *et al.*).

⁸⁰ See Factual & Legal Analysis at 9 n.10, MUR 6601 (Oelrich for Congress) ("It does not appear that the costs of the radio ad would constitute an in-kind contribution from the State Committee to the Federal Committee by virtue of being a coordinated communication. . . . Consistent with Commission advisory opinions, the Commission concludes that the advertisement here would not meet the payment prong of the coordination test at 11 C.F.R. § 109.21(a)(1).") (citing Advisory Opinion 2009-26 at 10 (Coulson) at 10 and Advisory Opinion 2007-01 at 5 (McCaskill)).

1 supporting Harris as an independent expenditure,⁸¹ satisfying the content standard at section
 2 109.21(c)(3), which is a public communication⁸² that expressly advocates the election or defeat
 3 of a clearly identified federal candidate.⁸³ Respondents do not dispute the Complaint's
 4 allegation that Stand for Truth's communication satisfied the payment and content prongs.

5 b. The Conduct Prong

6
 7 i. *Request or Suggestion, Material Involvement, and Substantial*
 8 *Discussion*
 9

10 The "request or suggestion" standard is "the most direct form of coordination, given that
 11 the candidate or political party committee communicates desires to another person who
 12 effectuates them."⁸⁴ The standard is satisfied if a person creating, producing, or distributing a
 13 communication does so at the request or suggestion of a candidate, authorized committee,
 14 political party committee, or their agent.⁸⁵ The standard is also satisfied if a person paying for a
 15 communication suggests the creation, production, or distribution of the communication to the
 16 candidate, authorized committee, political party committee, or their agent, and the candidate,
 17 authorized committee, political party committee, or agent assents to the suggestion.⁸⁶

⁸¹ <https://docquery.fec.gov/cgi-bin/fecimg/?202010079285046680>.

⁸² A "public communication" is "a communication by means of any broadcast, cable, or satellite communication, newspaper, magazine, outdoor advertising facility, mass mailing, or telephone bank to the general public, or any other form of general public political advertising. . . .[but] shall not include communications over the Internet, except for communications placed for a fee on another person's Web site." 11 C.F.R. §100.26.

⁸³ 11 C.F.R. § 109.21(c)(3). An "independent expenditure" means, in relevant part, an "expenditure by a person—(A) *expressly advocating* the election or defeat of a clearly identified candidate" 52 U.S.C. § 30101(17) (emphasis added); 11 C.F.R. §100.16.

⁸⁴ See Factual & Legal Analysis, MUR 7167 (Roy Blunt, *et al.*) (quoting Coordinated and Independent Expenditures, 68 Fed. Reg. at 432).

⁸⁵ 11 C.F.R. § 109.21(d)(1)(i).

⁸⁶ *Id.* at § 109.21(d)(1)(ii).

1 The “substantial discussion” standard is met when a communication is created, produced
2 or distributed after one or more “substantial discussion[s]” between the person paying for the
3 communication and the candidate.⁸⁷ A discussion is “substantial” within the meaning of the
4 regulation if information about the candidate’s plans, projects, activities or needs is conveyed to
5 the person paying for the communication, and that information is material to the creation,
6 production or distribution of the communication.⁸⁸

7 The “material involvement” conduct standard is met when a candidate is materially
8 involved in decisions regarding: (i) the content of the communication; (ii) the intended audience
9 for the communication; (iii) the means or mode of the communication; (iv) the specific media
10 outlet used for the communication; (v) the timing or frequency of the communication; or (vi) the
11 size or prominence of a printed communication, or duration of a communication by means of
12 broadcast, cable or satellite.⁸⁹ A candidate is considered “materially involved” after sharing
13 information (either directly or indirectly) about his or her plans, projects, activities, or needs with
14 the person making the communication.⁹⁰ The Commission explained that the candidate “need
15 not be present or included during [the] formal decision making process but need only participate
16 to the extent that he or she assists the ultimate decisionmaker.”⁹¹ Further, the involvement of the
17 candidate does not need to be traced directly to one specific communication.⁹² The “material

⁸⁷ *Id.* at § 109.21(d)(3).

⁸⁸ *Id.*

⁸⁹ *Id.* at § 109.21(d)(2). “[M]aterial” has its ordinary legal meaning, which is “important; more or less necessary; having influence or effect; going to the merits.” *Coordinated and Independent Expenditures*, 68 Fed. at 433.

⁹⁰ *Coordinated and Independent Expenditures*, 68 Fed. Reg. at 433-34.

⁹¹ *Id.* at 434.

⁹² *Id.* (“Rather, a candidate’s or political party committee’s involvement is material to a decision regarding a particular communication if that communication is one of a number of communications and the candidate or political party committee was materially involved in decisions regarding the strategy for those communications.”).

1 involvement” standard can overlap with the “substantial discussion” standard⁹³ but also
2 encompasses forms of “real world” coordination that the other conduct standards do not.⁹⁴

3 Because the State Committee, an entity that was controlled by Harris as a matter of law,
4 provided virtually all of the funding to finance Stand for Truth’s expenditures in support of
5 Harris, the circumstances in this matter indicate that Harris or an agent of Harris may have
6 satisfied one or more of the following conduct standards: (1) the communication was created,
7 produced, or distributed at the request or suggestion of Harris or the State Committee, or Harris
8 or the State Committee assented to it; (2) Harris or the State Committee was materially involved
9 in decisions regarding, among other things, the content, audience, media outlet, means, mode,
10 timing, frequency, or duration of the communication; (3) the communication was created,
11 produced, or distributed after one or more substantial discussions about the communication
12 between Stand for Truth and Harris or the State Committee.

13 Here, Stand for Truth had not received a contribution in over 4 years until it received the
14 State Committee’s \$120,000 contribution in September 2020 and \$6,500 in October 2020, which
15 were the only contributions that Stand for Truth received during the entire 2020 election cycle.
16 Further, Stand for Truth was largely dormant for several years, making no independent
17 expenditures during the 2018 election cycle, and the only independent expenditure it made
18 during the 2020 election cycle was the \$89,500 for the television advertisement supporting
19 Harris’s federal candidacy on September 24, 2020, only weeks after receiving the \$120,000 from
20 the State Committee. The timing combined with the facts that the same person — Harris —

⁹³ *Id.* at 433 (“Many activities that satisfy the ‘substantial discussion’ conduct standard will also satisfy the ‘material involvement’ standard”).

⁹⁴ *Id.*

1 controlled the entity that provided the sole source of funding to Stand for Truth during the 2020
2 election cycle *and* was also the beneficiary of Stand for Truth's only independent expenditure
3 during that time, are strong indicia that that Harris or his agents were involved in the creation and
4 dissemination of Stand for Truth's advertisement. Indeed, Stand for Truth, as an independent
5 expenditure-only committee, had no legal obligation to support Harris, yet it spent almost all its
6 available funds to support Harris's federal election shortly after receiving funds from the State
7 Committee.

8 Other facts also suggest that the State Committee was aware that it was making a
9 contribution to further the federal election of Harris. In reports filed with the Louisiana Board of
10 Ethics, the State Committee disclosed that the \$120,000 provided to Stand for Truth on
11 September 4, 2020 was an "expenditure," which according to the Candidate Report instructions,
12 means "any payment made for the purpose of supporting *your election* to public office."⁹⁵ At the
13 time of the State Committee's "expenditure," Harris was not a state "candidate," and would not
14 face reelection until 2023.⁹⁶ Finally, Stand for Truth's Response appears to acknowledge that
15 the State Committee gave for the purpose "to support *him*" (*i.e.*, Harris), revealing that the State
16 Committee provided the funds to Stand for Truth knowing such funds would, in turn, be used to
17 support Harris's federal candidacy.⁹⁷

⁹⁵ See Candidate's Report Instructions, <https://ethics.la.gov/Pub/CampFinan/Forms/Form102Instructions.pdf> (emphasis added); *id.* ("Any payments made that are not 'expenditures' should be reported on SCHEDULE E-2: OTHER DISBURSEMENTS."); Candidates Report, Lance Harris (Feb. 5, 2021), <https://www.ethics.la.gov/CampaignFinanceSearch/ShowEForm.aspx?ReportID=95431> (reporting \$120,000 provided to Stand for Truth as an "expenditure" on schedule E-1).

⁹⁶ See *supra* note 7; <https://voterportal.sos.la.gov/electedofficials> (select "State Representative - 25th District").

⁹⁷ Stand for Truth Resp. at 4 (emphasis added). Both the Harris Response and Stand for Truth Response argue that the State Committee's contribution was made without Harris's involvement, but as previously described, the State Committee was, as a matter of law EPMC'd by Harris and Harris signed the Candidate Report disclosing the \$120,000 expenditure to Stand for Truth. See *supra* n.43.

1 firewall policy, material information about the candidate's campaign plans, projects, activities, or
2 needs was used or conveyed to the person paying for the communication.¹⁰²

3 In the enforcement context, the Commission has advised that it will weigh the credibility
4 and specificity of a complaint's coordination allegation against the credibility and specificity of
5 facts presented in the response showing that the elements of the safe harbor are satisfied.¹⁰³ The
6 Commission has further advised that persons seeking to use the firewall safe harbor should be
7 prepared to provide reliable information, such as affidavits, about the firewall, and information
8 about how and when the firewall policy was distributed and implemented.¹⁰⁴

9 Here, the elements of the common vendor conduct standard appear to have been met.
10 First, Stand for Truth paid Go BIG Media \$89,500 on September 24, 2020, for TV advertising
11 supporting Harris. Second, during the previous 120 days Go BIG Media provided services to the
12 Federal Committee, receiving a total of \$42,961 for "media production," "video production,"
13 "graphic design," "ad design," and "digital media buy[s]" between July 29, 2020, and December
14 30, 2020.¹⁰⁵ Third, the available information suggests that Go Big Media may have conveyed
15 information about the Harris campaign's plans, projects, activities, or needs that was material for
16 the creation and distribution of Stand for Truth's television advertisement. Not only was Go BIG
17 Media simultaneously working for Stand for Truth and the Federal Committee, but (1) Go BIG
18 Media's client Stand for Truth received all of its recent income from an entity controlled by

¹⁰² *Id.* § 109.21(h).

¹⁰³ Coordinated Communications, 71 Fed. Reg. 33190, 33207 (June 8, 2006).

¹⁰⁴ *Id.*

¹⁰⁵ See *FEC Disbursements: Filtered Results*, FEC.GOV, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00741934&recipient_name=Go+big+media&two_year_transaction_period=2020&two_year_transaction_period=2022&min_date=01%2F01%2F2020&max_date=12%2F31%2F2022 (last visited July 26, 2021) (reflecting disbursements by Lance Harris for Congress to Go BIG Media).

1 Harris (*i.e.*, the beneficiary of the TV advertising); (2) Stand for Truth's disbursements to Go
2 BIG Media occurred shortly after it received \$120,000 from an entity controlled by Harris;
3 (3) the \$120,000 covered the costs of Go BIG Media's research and TV advertising supporting
4 Harris with exactly \$8,000 (15%) left over; (4) the \$102,000 paid to Go BIG Media was by far
5 Stand for Truth's largest disbursement in almost three years and its only expenditure over that
6 time supporting a candidate;¹⁰⁶ and (5) Go BIG Media was the *only* vendor Stand for Truth paid
7 to support Harris's candidacy.¹⁰⁷ Finally, the facts described above indicate that the State
8 Committee was *aware* that it was making a contribution to further Harris's election and that
9 Stand for Truth understood the State Committee gave for the purpose "to support *him*" (*i.e.*,
10 Harris), and suggests that Stand for Truth may have received information about Harris's plans,
11 projects, activities, or needs from Go BIG Media.¹⁰⁸

12 Although the Respondents contend that Go Big Media maintained a firewall policy, they
13 do not appear to have first-hand knowledge of how the firewall was implemented and do not
14 adequately explain how Go BIG's firewall met the conditions of the Commission's safe
15 harbor.¹⁰⁹ Instead, the Harris Response argues that "Go BIG Media was responsible for
16 implementing and adhering to an internal firewall policy that prevented the *exact* coordination at
17 issue."¹¹⁰ Stand for Truth's Response states that it "confirm[ed] the fact that [Go BIG Media]
18 had adopted and implemented a common vendor coordination firewall policy."¹¹¹ But such

¹⁰⁶ See Attach. 3.

¹⁰⁷ See *id.*; Stand for Truth, Inc. (search in "Spending" for "2015-2016," "2017-2018," and "2019-2020" election cycles), <https://www.fec.gov/data/committee/C00592337/>.

¹⁰⁸ See *supra* p. 23-24.

¹⁰⁹ Harris Resp. at 3; Stand for Truth Resp. at 3.

¹¹⁰ Harris Resp. at 4.

¹¹¹ Stand for Truth Resp. at 3.

1 conclusory statements do not describe how the policy prevented material information about
2 Harris's plans, projects, activities or needs from being shared.¹¹² Neither response provided
3 specific reliable information, such as affidavits or a copy of the firewall policy, documenting
4 how the firewall policy prevented information about Harris's plans, projects, activities, or needs
5 from being conveyed to Stand for Truth. Thus, Respondents have not provided sufficient
6 information to satisfy the safe harbor for the establishment of a firewall.

7 Under these circumstances, it does not appear to be mere happenstance that Stand for
8 Truth spent almost all its funds supporting Harris's federal candidacy. Rather, the record
9 indicates that Stand for Truth made, and that Harris and the Federal Committee accepted and
10 received, prohibited in-kind contributions in violation of 52 U.S.C. § 30118(a) in the form of
11 payments for research (\$12,500)¹¹³ and a television advertisement (\$89,500) that were
12 coordinated with Harris. It also appears that the Federal Committee and Stand for Truth failed to
13 report those in-kind contributions in violation of 52 U.S.C. § 30104(b).

14
15
16
17
18
19

¹¹² *Shays v. FEC*, 528 F.3d 914, 927-30 (D.C. Cir. 2008) (quoting the Commission's brief in upholding the firewall provision: "[a]n organization cannot come within the firewall safe harbor simply by alleging that it has an internal firewall"); *see also* Coordinated Communications, 71 Fed. Reg. at 33206 ("The commenters described how specific employees are placed on separate teams (or 'silos') within the organization, so that information does not pass between the employees who work on independent expenditures and the employees who work with candidates and their agents.").

¹¹³ The record supports finding that the \$12,500 Stand for Truth paid Go BIG Media for research qualifies as a coordinated expenditure under 11 C.F.R. § 109.20(b) for the same reasons that the conduct prong appears satisfied with respect to Stand for Truth's \$89,500 communication.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

V. RECOMMENDATIONS

1. Find reason to believe Lance Harris, and Campaign to Elect Lance Harris and Blaine Hebert in his official capacity as treasurer violated 52 U.S.C. § 30125(e) by transferring non-federal funds in connection with a Federal election;
 2. Find reason to believe Stand for Truth, Inc. and Hal Lambert in his official capacity as treasurer violated 52 U.S.C. § 30125(e) by receiving and spending non-federal funds in connection with a Federal election;
-

- 1 3. Authorize pre-probable cause conciliation with Lance Harris, Campaign to Elect
2 Lance Harris and Blaine Hebert in his official capacity as treasurer, and Stand for
3 Truth, Inc. and Hal Lambert in his official capacity as treasurer;
4
- 5 4. Take no action with respect to the allegation that Lance Harris for Congress and
6 Lance Harris in his official capacity as treasurer violated 52 U.S.C. §§ 30118(a) and
7 30104(b) by accepting or receiving, and failing to report, prohibited in-kind
8 contributions from Stand for Truth, Inc.;
- 9
- 10 5. Approve the attached Factual and Legal Analyses;
- 11
- 12 6. Approve the attached Conciliation Agreement; and
- 13
- 14 7. Approve the appropriate letters
- 15

16 In the alternative:

- 17
- 18 8. Find reason to believe Lance Harris, Campaign to Elect Lance Harris, and Blaine
19 Hebert in his official capacity as treasurer violated 52 U.S.C. § 30125(e) by spending
20 non-federal funds in connection with a Federal election
- 21
- 22 9. Find reason to believe that Stand for Truth, Inc. and Hal Lambert in his official
23 capacity as treasurer violated 52 U.S.C. §§ 30118(a) and 30104(b) by making, and
24 failing to report, prohibited in-kind contributions to Lance Harris for Congress;
- 25
- 26 10. Find reason to believe that Lance Harris for Congress and Lance Harris in his official
27 capacity as treasurer violated 52 U.S.C. §§ 30118(a) and 30104(b) by accepting or
28 receiving, and failing to report, prohibited in-kind contributions from Stand for Truth,
29 Inc.;
- 30
- 31 11. Find reason to believe that Lance Harris violated 52 U.S.C. § 30118(a) by accepting
32 or receiving prohibited in-kind contributions from Stand for Truth, Inc.;
- 33
- 34 12. Take no action with respect to the allegation that Stand for Truth, Inc. and Hal
35 Lambert in his official capacity as treasurer violated 52 U.S.C. § 30125(e) by
36 receiving and spending non-federal funds;
- 37
- 38 13. Authorize the use of compulsory process, including the issuance of appropriate
39 interrogatories, document subpoenas and deposition subpoenas, as necessary;
- 40
- 41 14. Approve the attached alternative Factual and Legal Analyses;
- 42
- 43 15. Approve the appropriate letters.
- 44
- 45
- 46

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37

Lisa J. Stevenson
Acting General Counsel

Charles Kitcher
Associate General Counsel for Enforcement

08.31.21

DATE

Stephen Gura

Stephen Gura
Deputy Associate General Counsel for Enforcement

Jin Lee

Jin Lee
Acting Assistant General Counsel

Christopher S. Curran

Christopher S. Curran
Attorney

Attachments

1. State Committee Financial Summary
2. State Committee Contributors
3. Stand for Truth Financial Summary
4. State Committee Expenditures

Campaign to Elect Lance Harris - Financial Summary				
Coverage Period	Funds on Hand at Beginning	Funds on Hand at Close	Total Contributions	Total Disbursements
1/1/2020 - 12/31/2020	\$ 167,339.57	\$ 12,226.23	\$ 18,250.66	\$ 173,814.00
9/23/2019 - 12/31/2019	\$ 167,138.38	\$ 167,339.57	\$ 13,251.19	\$ 13,050.00
9/3/2019 - 9/22/2019	\$ 173,138.38	\$ 167,138.38	\$ 500.00	\$ 6,500.00
7/5/2019 - 9/2/2019	\$ 184,070.35	\$ 173,138.38	\$ 5,640.00	\$ 16,571.97
4/6/2019 - 7/4/2019	\$ 201,952.10	\$ 184,070.35	\$ 1,250.00	\$ 19,131.75
1/1/2019 - 4/5/2019	\$ 161,523.06	\$ 201,952.10	\$ 60,250.30	\$ 19,321.62
1/1/2018 - 12/31/2018	\$ 164,803.66	\$ 161,523.06	\$ 13,700.18	\$ 16,980.78
1/1/2017 - 12/31/2017	\$ 160,862.52	\$ 164,803.66	\$ 12,577.63	\$ 8,608.86
1/1/2016 - 12/31/2016	\$ 170,996.66	\$ 160,862.52	\$ 9,700.00	\$ 19,834.14

1

Campaign to Elect Lance Harris - Contributors

Contributor Name	Address	City	State	Date	Amount	Entity
GARRET GRAVES FOR CONGRESS		Beverly	MA	10/24/2019	\$500.00	Candidate Committee
ENOVA		Chicago	IL	3/11/2016	\$250.00	Corporation
HORSEMENS ALLIANCE		New Orleans	LA	3/14/2016	\$250.00	Corporation
LAMMICO		Metairie	LA	9/23/2016	\$500.00	Corporation
NORFOLK SOUTHERN CORPORATION		Norfolk	VA	9/23/2016	\$250.00	Corporation
HILCORP ENERGY COMPANY		Houston	TX	11/7/2016	\$500.00	Corporation
CENTURYTEL INC		Monroe	LA	12/14/2016	\$700.00	Corporation
UNITED HEALTHCARE GROUP, INC		Minneapolis	MN	12/14/2016	\$500.00	Corporation
CHEVRON POLICY GOVT & PUBLIC AFFAIRS		San Ramon	CA	2/13/2017	\$300.00	Corporation
EXXON MOBILE CORPORATION		Houston	TX	2/13/2017	\$500.00	Corporation
NRG ENERGY INC		Pinceton	NJ	2/13/2017	\$500.00	Corporation
PFIZER, INC.		Memphis	TN	3/20/2017	\$250.00	Corporation
WASTE MANAGEMENT		Houston	TX	3/31/2017	\$250.00	Corporation
GULF STATE TOYOTA, INC.		Houston	TX	4/7/2017	\$500.00	Corporation
PHILLIPS 66 COMPANY		Baton Rouge	LA	4/7/2017	\$250.00	Corporation
UNION PACIFIC RAILROAD		Pacific	MO	4/7/2017	\$250.00	Corporation
HORSEMEN'S ALLIANCE		New Orleans	LA	4/10/2017	\$250.00	Corporation
WALGREENS FAMILY OF COMPANIES		Deerfield	IL	4/10/2017	\$250.00	Corporation
EXXON MOBIL CORPORATION		Baton Rouge	LA	12/11/2017	\$1,000.00	Corporation
CHEVRON POLICY GOFT & PUBL AFFAIRS		San Ramon	CA	2/21/2018	\$300.00	Corporation
GENERAL MOTORS COMPANY		Washington	DC	2/21/2018	\$250.00	Corporation
KOCH INDUSTRIES, INC.		Wichita	KS	2/21/2018	\$500.00	Corporation
HORSEMENS ALLIANCE		New Orleans	LA	3/8/2018	\$250.00	Corporation
THE FRIEDKIN GROUP		Houston	TX	3/9/2018	\$1,000.00	Corporation
NOVARTIS PHARMACEUTICALS CORP		East Hanover	NJ	6/5/2018	\$500.00	Corporation
BNSF RAILWAY COMPANY		Fort Worth	TX	9/27/2018	\$500.00	Corporation
MERCK SHARP & DOKME CORP		Whitehouse Station	NJ	9/27/2018	\$500.00	Corporation
NORTON MEDICAL, APMC		Alexandria	LA	9/27/2018	\$250.00	Corporation
RAI SERVICES COMPANY		Winston-Salem	NC	9/27/2018	\$300.00	Corporation
REDMOND MEDICAL, APMC		Alexandria	LA	9/27/2018	\$200.00	Corporation
REISH MEDICAL, APMC		Alexandria	LA	9/27/2018	\$250.00	Corporation
RUSSO MEDICAL, APMC		Alexandria	LA	9/27/2018	\$200.00	Corporation
EXXON MOBILE CORPORATION		Houston	TX	11/7/2018	\$500.00	Corporation
UNION PACIFIC RAILROAD		Pacific	MO	12/28/2018	\$500.00	Corporation
MICHAEL A. SHELTON ENTERPRISES, INC.		Alexandria	LA	2/19/2019	\$1,000.00	Corporation

OCCIDENTAL CHEMICAL CORPORATION
NORTON MEDICAL, APMC
BUSINESS AFFAIRS RESEARCH PROGRAM, INC.
COX COMMUNICATIONS, INC.
HARRIS DEVILLE & ASSOCIATES
HAYNIE & ASSOCIATES, INC.
LOUISIANA MANUFACTURED HOUSING ASSOCIATION
CENTURYTEL, INC.
COMCAST FINANCIAL AGENCY CORPORATION
PHILLIPS 66 COMPANY
MARATHON PETROLEUM CO
PHARMACEUTICAL RESEARCH AND MANUFACTURERS OF AMERICA
HORSEMENS ALLIANCE
NORFOLK SOUTHERN CORPORATION
BLUE CROSS BLUE SHIELD OF LOUISIANA
BUSINESS AFFAIRS RESEARCH PROGRAM, INC.
LAMMICO
MERCK & CO., INC.
NOVARTIS FSC
CIGNA
EXXON MOBIL CORPORATION
BERNHARD LLC CORPORATE
COMPREHENSIVE HEALTH MANAGEMENT INC
PFIZER, INC.
PHILLIPS 66 COMPANY
WALGREENS FAMILY OF COMPANIES
INDEPENDENT RX
JEFFREY HALL
ALFRED MANSOUR, JR
GREG BAKER STATE FARM
KYLE DRERUP
MICHAEL D CROWELL
PATRICK CUNNINGHAM
CAROLE BAXTER
CHARLES WEEMS
CHARLIE ELLIOTT
DANIEL BRENNER
EDWARD TARPLEY, JR. APMC
GLENDA STOCK

Houston	TX	2/19/2019	\$1,000.00	Corporation
Alexandria	LA	2/26/2019	\$1,000.00	Corporation
Baton Rouge	LA	3/14/2019	\$500.00	Corporation
Baton Rouge	LA	3/14/2019	\$250.00	Corporation
Baton Rouge	LA	3/14/2019	\$500.00	Corporation
Lafayette	LA	3/14/2019	\$500.00	Corporation
Baton Rouge	LA	3/14/2019	\$500.00	Corporation
Monroe	LA	3/27/2019	\$500.00	Corporation
Philadelphia	PA	3/27/2019	\$250.00	Corporation
Baton Rouge	LA	4/5/2019	\$1,000.66	Corporation
Findlay	OH	6/17/2019	\$1,000.00	Corporation
Baton Rouge	LA	8/13/2019	\$1,000.00	Corporation
New Orleans	LA	8/19/2019	\$500.00	Corporation
Norfolk	VA	8/19/2019	\$500.00	Corporation
Baton Rouge	LA	10/2/2019	\$500.00	Corporation
Baton Rouge	LA	10/2/2019	\$500.00	Corporation
Metairie	LA	10/2/2019	\$250.00	Corporation
Kenilworth	NJ	10/15/2019	\$500.00	Corporation
Fort Worth	TX	10/15/2019	\$250.00	Corporation
Bloomfield	CT	10/24/2019	\$500.00	Corporation
Baton Rouge	LA	12/10/2019	\$1,000.00	Corporation
Baton Rouge	LA	1/17/2020	\$500.00	Corporation
Tampa	FL	1/17/2020	\$1,000.00	Corporation
Memphis	TN	1/17/2020	\$250.00	Corporation
Baton Rouge	LA	1/17/2020	\$500.66	Corporation
Deerfield	IL	3/9/2020	\$250.00	Corporation
Baton Rouge	LA	10/20/2020	\$1,000.00	Corporation
ALEXANDRIA	LA	1/1/2016	\$250.00	Individual
Alexandria	LA	2/19/2019	\$250.00	Individual
Alexandria	LA	2/19/2019	\$250.00	Individual
Alexandria	LA	2/19/2019	\$1,000.00	Individual
Long Leaf	LA	2/19/2019	\$1,000.00	Individual
Alexandria	LA	2/19/2019	\$500.00	Individual
Alexandria	LA	2/26/2019	\$1,000.00	Individual
Alexandria	LA	2/26/2019	\$500.00	Individual
Boyce	LA	2/26/2019	\$250.00	Individual
Alexandria	LA	2/26/2019	\$250.00	Individual
Alexandria	LA	2/26/2019	\$250.00	Individual
Boyce	LA	2/26/2019	\$1,000.00	Individual

GREGORY UPTON
JASON E COBB
JOHN TUDOR
KYLE DOWNS
LANCE E TEMPLETON
MARION CHANEY
MICHAEL MADISON
RANDALL WELCH
RENEE MADDOX
REYMOND MEADAA
SAMUEL T MAHFOUZ
SCOTT BRAME
STEPHEN D DOWNS
WALTER WARWICK
MATTHEW RITCHIE
ALICE G YOUNG
ARTHUR NESOM
BART A SCHMOLKE
C C PROVINCE
DALE G HARRINGTON
DAVID CARLTON
EDWARD RUNDELL
GREG BAKER
IRENE SAUCIER
JAMES G DELEE
JANE PIPPINS
JOAN BRUNSON
JUDITH MADDEN
LEE A ROY
LYDIA G GRAYSON
LYN G GOODIN
MARGUERITE MCNEELY
MARIE EDDLEMON
PATTIE PEBBLES
PHILLIS BROUSSARD
R A MONSUR
R D JACKSON
R G COTTON
RENEE MADDOX
ROBERT HOLLINGSWORTH
RYAN RICHE
STEVEN COOK
DEBORAH RANDOLPH

Alexandria	LA	2/26/2019	\$250.00	Individual
Alexandria	LA	2/26/2019	\$250.00	Individual
Alexandria	LA	2/26/2019	\$1,000.00	Individual
Alexandria	LA	2/26/2019	\$2,000.00	Individual
Alexandria	LA	2/26/2019	\$1,000.00	Individual
Alexandria	LA	2/26/2019	\$250.00	Individual
Shreveport	LA	2/26/2019	\$2,500.00	Individual
Jena	LA	2/26/2019	\$1,000.00	Individual
Boyce	LA	2/26/2019	\$250.00	Individual
Alexandria	LA	2/26/2019	\$1,000.00	Individual
Alexandria	LA	2/26/2019	\$2,500.00	Individual
Alexandria	LA	2/26/2019	\$250.00	Individual
Alexandria	LA	2/26/2019	\$250.00	Individual
Alexandria	LA	2/26/2019	\$500.00	Individual
Pineville	LA	3/14/2019	\$1,000.00	Individual
Alexandria	LA	8/19/2019	\$25.00	Individual
Glenmora	LA	8/19/2019	\$50.00	Individual
Boyce	LA	8/19/2019	\$200.00	Individual
Alexandria	LA	8/19/2019	\$100.00	Individual
Alexandria	LA	8/19/2019	\$50.00	Individual
Alexandria	LA	8/19/2019	\$250.00	Individual
Alexandria	LA	8/19/2019	\$500.00	Individual
Alexandria	LA	8/19/2019	\$500.00	Individual
Alexandria	LA	8/19/2019	\$25.00	Individual
Alexandria	LA	8/19/2019	\$100.00	Individual
Woodworth	LA	8/19/2019	\$10.00	Individual
Alexandria	LA	8/19/2019	\$200.00	Individual
Alexandria	LA	8/19/2019	\$100.00	Individual
Boyce	LA	8/19/2019	\$25.00	Individual
Alexandria	LA	8/19/2019	\$50.00	Individual
Alexandria	LA	8/19/2019	\$100.00	Individual
Hineston	LA	8/19/2019	\$200.00	Individual
Hineston	LA	8/19/2019	\$30.00	Individual
Alexandria	LA	8/19/2019	\$100.00	Individual
Woodworth	LA	8/19/2019	\$25.00	Individual
Boyce	LA	8/19/2019	\$50.00	Individual
Alexandria	LA	8/19/2019	\$50.00	Individual
Alexandria	LA	8/19/2019	\$100.00	Individual
Boyce	LA	8/19/2019	\$500.00	Individual
Alexandria	LA	8/19/2019	\$50.00	Individual
Lecompte	LA	8/19/2019	\$50.00	Individual
Alexandria	LA	8/19/2019	\$100.00	Individual
Alexandria	LA	9/3/2019	\$500.00	Individual

CLAY ROBERTSON
CLYDE MYERS
J M ELLINGTON
RYAN, LLC
STEPHEN DOWNS
JOHN GIELEN
ADVANCE AMERICA
ALTRIA CLIENT SERVICES LLC
ADVANCE AMERICA
COURSON NICKEL, LLC
ALTRIA CLIENT SERVICES LLC
MCNA HEALTH CARE HOLDINGS, LLC
ADVANCE AMERICA
PRR MEDICAL, LLC
ALTRIA CLIENT SERVICES LLC
MEYER, MEYER, LACROIX & HIXSON LLC
WALKER MANAGEMENT COMPANY OF ALEXANDRIA
DIAMOND B. CONSTRUCTION CO., LLC
DUN-COUR, LLC
J DUNCAN ENTERPRISES, LLC
LIL BOO'S CORNER STORE, LLC
MARIN SUSTAINABLE RESOURCES, LLC
MEDICO, LLC
NAOMI HEIGHTS NURSING & REHABILITATION CENTER, LLC
BUG BLASTERS, LLC
HAYES STRATEGIC SOLUTIONS, LLC
IMPERIAL TRADING COMPANY, LLC
NORPAC, LLC
SOUTHERN STRATEGY GROUP OF LOUISIANA, LLC
ADVANTOUS CONSULTING, LLC
BELTON CONSULTING LLC
RAINWATER CONSULTING, LLC
KIDS DENTAL ZONE ALEXANDRIA, LLC
ISC CONSTRUCTORS, LLC
ALPINE LAWN & LANDSCAPE, LLC
TRANSMED, LLC
ALTRIA CLIENT SERVICES LLC
EPIC PIPING LLC
KIDS DENTAL ZONE ALEXANDRIA, LLC

Alexandria	LA	10/2/2019	\$50.00	Individual
Glenmora	LA	10/2/2019	\$50.00	Individual
Alexandria	LA	10/2/2019	\$50.00	Individual
Dallas	TX	10/2/2019	\$250.00	Individual
Alexandria	LA	10/2/2019	\$250.00	Individual
Lafayette	LA	1/17/2020	\$500.00	Individual
Spartanburg	SC	3/14/2016	\$250.00	LLC
Richmond	VA	11/7/2016	\$500.00	LLC
Spartanburg	SC	4/10/2017	\$250.00	LLC
Baton Rouge	LA	4/10/2017	\$250.00	LLC
Richmond	VA	2/21/2018	\$500.00	LLC
Fort Lauderdale	FL	2/21/2018	\$500.00	LLC
Spartanburg	SC	3/8/2018	\$250.00	LLC
Alexandria	LA	9/27/2018	\$200.00	LLC
Richmond	VA	12/28/2018	\$250.00	LLC
Alexandria	LA	2/19/2019	\$500.00	LLC
Alexandria	LA	2/19/2019	\$500.00	LLC
Alexandria	LA	2/26/2019	\$1,000.00	LLC
Alexandria	LA	2/26/2019	\$250.00	LLC
Alexandria	LA	2/26/2019	\$1,000.00	LLC
Boyce	LA	2/26/2019	\$1,000.00	LLC
Alexandria	LA	2/26/2019	\$2,500.00	LLC
Ridgeland	MS	2/26/2019	\$1,000.00	LLC
Winnfield	LA	2/26/2019	\$2,500.00	LLC
Pineville	LA	3/14/2019	\$250.00	LLC
Baton Rouge	LA	3/14/2019	\$250.00	LLC
Elmwood	LA	3/14/2019	\$500.00	LLC
Metairie	LA	3/14/2019	\$1,000.00	LLC
Baton Rouge	LA	3/14/2019	\$500.00	LLC
Baton Rouge	LA	3/27/2019	\$500.00	LLC
Baton Rouge	LA	3/27/2019	\$250.00	LLC
Baton Rouge	LA	3/27/2019	\$1,000.00	LLC
Alexandria	LA	4/5/2019	\$1,000.00	LLC
Baton Rouge	LA	4/8/2019	\$250.00	LLC
Dry Prong	LA	8/19/2019	\$100.00	LLC
Ridgeland	MS	10/2/2019	\$2,500.00	LLC
Richmond	VA	1/17/2020	\$250.00	LLC
Baton Rouge	LA	1/17/2020	\$500.00	LLC
Alexandria	LA	3/6/2020	\$500.00	LLC

LEBLANC FANTACI VILLIO LLC
WAL PAC
LASFAA PAC INC
LOUISIANA NURSING HOME PAC
LAMPAC
DENTAL ACCESS AND PREVENTION PAC
LASFAA PAC INC
LOUISIANA OIL MARKETERS & CONVENIENCE STORE ASSOCIATION PAC
LOUISIANA RESTAURANT ASSOCIATION HOSPITALITY PAC
WAL PAC
LA DENTAL POLITICAL ACTION COMMITTEE
DELOITTE POLITICAL ACTION COMMITTEE
DENTAL ACCESS AND PREVENTION PAC
ENTERPRISE HOLDINGS INC PAC
TRAVEL PAC
ENPAC LOUISIANA
HCA LOUISIANA GOOD GOVERNMENT FUND
LA RESTAURANT ASSOCIATION - HOSPITALITY PAC
LOUISIANA OIL MARKETERS & CONVENIENCE STORE ASSOCIATION PAC
CRPPA LOCAL PAC
HOSPAC
LOUISIANA SHERIFF'S AND DEPUTIES POLITICAL ACTION COMMITTEE
GOPAC ELECTION FUND
LOUISIANA BANKERS ASSOCIATION STATE PAC
LOUISIANA RESTAURANT ASSOCIATION HOSPITALITY PAC
LOUISIANA OIL MARKETERS & CONVENIENCE STORE ASSOCIATION PAC
VERTEX PHARMACEUTICALS INCORPORATED POLITICAL CONTRIBUTIONS
AGRIPAC
DENTAL ACCESS AND PREVENTION PAC
BP NORTH AMERICA EMPLOYEE PAC
HCA LOUISIANA GOOD GOVERNMENT FUND
CRPPA LOCAL PAC

Metairie	LA	10/20/2020	\$500.00	LLC
Bentonville	AR	1/2/2016	\$500.00	PAC
Baton Rouge	LA	1/11/2016	\$1,000.00	PAC
Baton Rouge	LA	2/10/2016	\$500.00	PAC
Baton Rouge	LA	2/12/2016	\$1,000.00	PAC
Baton Rouge	LA	3/7/2016	\$500.00	PAC
Baton Rouge	LA	3/7/2016	\$1,000.00	PAC
Baton Rouge	LA	3/14/2016	\$250.00	PAC
Metairie	LA	3/14/2016	\$500.00	PAC
Bentonville	AR	11/7/2016	\$500.00	PAC
Baton Rouge	LA	2/13/2017	\$500.00	PAC
Washington	LA	4/7/2017	\$250.00	PAC
Baton Rouge	LA	4/7/2017	\$500.00	PAC
St. Louis	MO	4/7/2017	\$250.00	PAC
Baton Rouge	LA	4/7/2017	\$250.00	PAC
Baton Rouge	LA	4/10/2017	\$1,500.00	PAC
Baton Rouge	LA	4/10/2017	\$500.00	PAC
Metairie	LA	4/10/2017	\$500.00	PAC
Baton Rouge	LA	4/10/2017	\$500.00	PAC
Belle Chasse	LA	6/21/2017	\$500.00	PAC
Baton Rouge	LA	10/26/2017	\$1,000.00	PAC
Baton Rouge	LA	10/26/2017	\$800.00	PAC
Arlington	VA	11/15/2017	\$700.00	PAC
Baton Rouge	LA	2/21/2018	\$2,500.00	PAC
Metairie	LA	2/21/2018	\$1,000.00	PAC
Baton Rouge	LA	3/8/2018	\$250.00	PAC
Boston	MA	3/8/2018	\$500.00	PAC
Baton Rouge	LA	3/9/2018	\$500.18	PAC
Baton Rouge	LA	3/9/2018	\$500.00	PAC
Houston	TX	9/27/2018	\$250.00	PAC
Lafayette	LA	12/28/2018	\$500.00	PAC
Belle Chasse	LA	2/19/2019	\$500.00	PAC

GENERAL MOTORS COMPANY PAC
BETTER GOVERNMENT POLITICAL ACTION COMMITTEE
CLECO POLITICAL ACTION COMMITTEE
ADAMS & REESE PAC
ATMOS ENERGY CORPORATION PAC
FAIR PAC
LA ASSOCIATED GENERAL CONTRACTORS CONSTRUCTION INDUSTRY PAC
LA DENTAL PAC
LOUISIANA ASSOCIATION OF WHOLSALERS POLITICAL ACTION COMMITTEE
LOUISIANA MANUFACTURERS PAC
LOUISIANA NURSING HOME PAC
LOUISIANA OIL MARKETERS & CONVENIENCE STORE ASSOCIATION PAC
LOUISIANA REALTORS PAC
LOUISIANA RESTAURANT ASSOCIATION HOSPITALITY PAC
LADA-PAC
LASFAA PAC INC
ABC PELICAN PAC
DENTAL ACCESS AND PREVENTION PAC
AGRIPAC
LAMPAC
LOUISIANA CPA POLITICAL ACTION COMMITTEE
LOUISIANA SHERIFF'S AND DEPUTIES POLITICAL ACTION COMMITTEE
VALERO POLITICAL ACTION COMMITTEE
BP NORTH AMERICA EMPLOYEE PAC
LASFAA PAC INC
DELOITTE POLITICAL ACTION COMMITTEE
GENERAL MOTORS COMPANY PAC
HCA LOUISIANA GOOD GOVERNMENT FUND
LA DENTAL POLITICAL ACTION COMMITTEE
SUGAR PAC
DENTAL ACCESS AND PREVENTION PAC
LA RESTAURANT ASSOCIATION - HOSPITALITY PAC

Washington	DC	2/19/2019	\$500.00	PAC
New Orleans	LA	2/26/2019	\$500.00	PAC
Pineville	LA	2/26/2019	\$1,000.00	PAC
Baton Rouge	LA	3/14/2019	\$500.00	PAC
Dallas	TX	3/14/2019	\$500.00	PAC
Baton Rouge	LA	3/14/2019	\$1,000.00	PAC
Baton Rouge	LA	3/14/2019	\$500.00	PAC
Baton Rouge	LA	3/14/2019	\$1,000.00	PAC
Baton Rouge	LA	3/14/2019	\$1,000.00	PAC
Baton Rouge	LA	3/14/2019	\$500.00	PAC
Baton Rouge	LA	3/14/2019	\$1,000.00	PAC
Baton Rouge	LA	3/14/2019	\$1,500.00	PAC
Baton Rouge	LA	3/14/2019	\$2,500.00	PAC
Metairie	LA	3/14/2019	\$1,000.00	PAC
Baton Rouge	LA	3/27/2019	\$500.00	PAC
Baton Rouge	LA	3/27/2019	\$1,000.00	PAC
Baton Rouge	LA	4/5/2019	\$250.00	PAC
Baton Rouge	LA	4/5/2019	\$500.00	PAC
Baton Rouge	LA	10/2/2019	\$501.19	PAC
Baton Rouge	LA	10/2/2019	\$2,500.00	PAC
Kenner	LA	10/2/2019	\$250.00	PAC
Baton Rouge	LA	10/2/2019	\$1,000.00	PAC
San Antonio	TX	10/2/2019	\$500.00	PAC
Houston	TX	10/24/2019	\$350.00	PAC
Baton Rouge	LA	10/24/2019	\$1,000.00	PAC
Washington	LA	1/17/2020	\$500.00	PAC
Washington	DC	1/17/2020	\$500.00	PAC
Baton Rouge	LA	1/17/2020	\$500.00	PAC
Baton Rouge	LA	1/17/2020	\$500.00	PAC
Thibodaux	LA	1/17/2020	\$500.00	PAC
Baton Rouge	LA	3/6/2020	\$500.00	PAC
Metairie	LA	3/6/2020	\$1,000.00	PAC

LASFAA PAC INC
LASFAA PAC, INC.
HOSPAC
HOSPAC
JONES WALKER LLP
THE JONATHAN E. MARTIN FAMILY TRUST

1

Baton Rouge	LA	3/6/2020	\$2,500.00	PAC
Baton Rouge	LA	3/9/2020	\$1,000.00	PAC
Baton Rouge	LA	10/20/2020	\$2,500.00	PAC
Baton Rouge	LA	10/20/2020	\$2,500.00	PAC
Baton Rouge	LA	3/14/2019	\$250.00	Partnership
Alexandria	LA	3/14/2019	\$1,000.00	Trust

Stand for Truth - Financial Summary				
Report Coverage	Beginning Cash-on-Hand	Ending Cash-on-Hand	Total Receipts	Total Disbursements
11/17/2015 - 12/31/2015	\$ -	\$ 2,065,001.16	\$ 2,474,201.64	\$ 409,200.48
1/1/2016 - 1/31/2016	\$ 2,065,001.16	\$ 1,230,666.18	\$ 2,457,229.70	\$ 3,291,564.68
2/1/2016 - 2/29/2016	\$ 1,230,666.18	\$ 290,810.60	\$ 3,937,879.98	\$ 4,877,735.56
3/1/2016 - 3/31/2016	\$ 290,810.60	\$ 541,612.94	\$ 2,170,135.51	\$ 1,919,333.17
4/1/2016 - 4/30/2016	\$ 541,612.94	\$ 521,612.94	\$ 105,000.00	\$ 125,000.00
5/1/2016 - 5/31/2016	\$ 521,612.94	\$ 425,067.94	\$ 145,000.00	\$ 241,545.00
6/1/2016 - 6/30/2016	\$ 425,067.94	\$ 279,950.21	\$ 67.50	\$ 145,185.23
7/1/2016 - 7/31/2016	\$ 279,950.21	\$ 256,057.20	\$ -	\$ 23,893.01
8/1/2016 - 8/30/2016	\$ 256,057.20	\$ 252,889.01	\$ -	\$ 3,168.19
9/1/2016 - 9/30/2016	\$ 252,889.01	\$ 245,389.01	\$ -	\$ 7,500.00
10/1/2016 - 10/19/2016	\$ 245,389.01	\$ 237,340.93	\$ -	\$ 8,048.08
10/20/2016 - 11/28/2016	\$ 237,340.93	\$ 236,315.23	\$ -	\$ 1,450.10
11/29/2016 - 12/31/2016	\$ 236,315.23	\$ 230,436.65	\$ -	\$ 5,878.58
1/1/2017 - 6/30/2017	\$ 230,436.65	\$ 173,992.98	\$ 771.00	\$ 57,214.67
7/1/2017 - 12/31/2017	\$ 173,992.98	\$ 21,661.95	\$ -	\$ 152,331.03
1/1/2018 - 3/31/2018	\$ 21,661.95	\$ 21,456.95	\$ -	\$ 205.00
4/1/2018 - 6/30/2018	\$ 21,456.95	\$ 21,456.95	\$ -	\$ -
7/1/2018 - 9/30/2018	\$ 21,456.95	\$ 19,589.95	\$ -	\$ 1,867.00
10/1/2018 - 11/26/2018	\$ 19,589.95	\$ 19,589.95	\$ -	\$ -
11/27/2018 - 12/31/2018	\$ 19,589.95	\$ 19,118.95	\$ -	\$ 471.00
1/1/2019 - 6/30/2019	\$ 19,118.95	\$ 17,609.95	\$ -	\$ 1,509.00
7/1/2019 - 12/31/2019	\$ 17,609.95	\$ 6,540.70	\$ -	\$ 11,069.25
1/1/2020 - 3/31/2020	\$ 6,540.70	\$ 6,540.70	\$ -	\$ -
4/1/2020 - 6/30/2020	\$ 6,540.70	\$ 5,639.20	\$ -	\$ 901.50
7/1/2020 - 9/30/2020	\$ 5,639.20	\$ 23,639.20	\$ 120,000.00	\$ 102,000.00
10/1/2020 - 11/23/2020	\$ 23,639.20	\$ 30,129.20	\$ 6,500.00	\$ -
11/24/2020 - 12/31/2020	\$ 30,129.20	\$ 30,139.20	\$ -	\$ -
Total			\$ 11,416,785.33	\$ 11,387,070.53

Campaign to Elect Lance Harris - Expenditures						
Name	Address	City	State	Description	Date	Amount
RED RIVER BANK		Alexandria	LA	chargeback	1/11/2016	\$500.00
RED RIVER BANK		Alexandria	LA	chargeback fee	1/11/2016	\$10.00
CONNECT STRATEGIC COMMUNICATIONS		Dallas	TX	Digital Strategy Program - July	2/10/2016	\$2,000.00
CONNECT STRATEGIC COMMUNICATIONS		Dallas	TX	Strategic Consulting First Half; Digital Strategy Program - September; Travel Expenditures to DC	2/10/2016	\$6,188.00
CONNECT STRATEGIC COMMUNICATIONS		Dallas	TX	Digital Strategy Program: Final Retainer Payment	2/10/2016	\$1,806.56
HOUSE REPUBLICAN CAUCUS		Baton Rouge	LA	2016 Caucus Dues	2/16/2016	\$300.00
GLENDIA STOCK		Boyce	LA	refund of overpayment of campaign contribution	3/8/2016	\$500.00
3 STRATEGIES LLC		Baton Rouge	LA	Social Media Consulting: Feb 15-Mar15; Mar 15-Apr 15	4/4/2016	\$1,000.00
CONNECT STRATEGIC COMMUNICATIONS		Dallas	TX	Digital Strategy Program - August	4/11/2016	\$2,000.00
3 STRATEGIES LLC		Baton Rouge	LA	Consulting Apr 15-May 15	5/2/2016	\$500.00
3 STRATEGIES LLC		Baton Rouge	LA	Social Media Consulting 5 weeks; Facebook Ad Buy; Capital Outlay	7/27/2016	\$941.25
WALMART		Alexandria	LA	supplies for Republican Committee Office	9/13/2016	\$32.72
LOUISIANA REPUBLICAN PARTY		Baton Rouge	LA	contribution	9/22/2016	\$3,000.00
FOWLCO PRINTING COMPANY		Alexandria	LA	Christmas cards for campaign contributors	12/27/2016	\$1,055.61
REPUBLICAN LEGISLATIVE DELEGATION CAMPAIGN COMMITTEE		Baton Rouge	LA	Annual Republican Dues	3/6/2017	\$300.00
REPUBLICAN LEGISLATIVE DELEGATION CAMPAIGN COMMITTEE		Baton Rouge	LA	Dues	5/12/2017	\$3,000.00
THE POLITICAL FIRM, LLC		Baton Rouge	LA	September, 2017 Retainer - Political Consulting	9/13/2017	\$1,500.00
THE POLITICAL FIRM, LLC		Baton Rouge	LA	October, 2017 Retainer - Political Consulting	10/9/2017	\$1,500.00

FOWLCO PRINTING COMPANY	Alexandria	LA	Christmas Cards for Contributors (500 Qty)	11/1/2017	\$808.86
THE POLITICAL FIRM, LLC	Baton Rouge	LA	November, 2017 Retainer - Political Consulting	11/7/2017	\$1,500.00
LR3 CONSULTING, LLC	Baton Rouge	LA	Consulting Services for Regular & Special Sessions (Retainer, Video Productions & Facebook Advertising)	3/16/2018	\$6,000.00
HOUSE REPUBLICAN CAUCUS	Baton Rouge	LA	2018 Caucus Dues	4/5/2018	\$300.00
RRPEC	Alexandria	LA	Regan Dinner Sponsorship	6/19/2018	\$600.00
LR3 CONSULTING, LLC	Baton Rouge	LA	Special Session Consulting - \$2,000.00 Facebook Advertising Digital Services - \$1,00.00	6/27/2018	\$3,500.00
RAPIDES PARISH REPUBLICAN WOMENS CLUB	Pineville	LA	Table sponsorship for campaign roasting of Lance Harris	8/24/2018	\$1,000.00
RAPIDES PARISH REPUBLICAN WOMENS CLUB	Pineville	LA	Individual Ticket to Campaign Roast for Lance Harris	9/14/2018	\$50.00
SUSAN STEVISON PHOTOGRAPHY	Pineville	LA	Photography for Campaign Ad	10/19/2018	\$1,030.78
LR3 CONSULTING, LLC	Baton Rouge	LA	Polling - Remington Research Poll for 2019 Election	11/26/2018	\$4,500.00
LR3 CONSULTING, LLC	Baton Rouge	LA	Consulting Retainer; Graphic Design for Logo & Social Media; Facebook Advertising - January, 2019	1/8/2019	\$6,500.00
LR3 CONSULTING, LLC	Baton Rouge	LA	Consulting Retainer & Facebook Advertising - February, 2019	2/8/2019	\$3,500.00
COLLIN RICHIE PHOTOGRAPHY	Baton Rouge	LA	Commercial Photography Package	2/20/2019	\$350.00
WORD OF MOUTH, LLC	Alexandria	LA	Catering for Fundraiser	2/25/2019	\$846.62
LOUISIANA REPUBLICAN LEGISLATIVE DELEGATION	Baton Rouge	LA	2019 Dues	3/11/2019	\$300.00
LR3 CONSULTING, LLC	Baton Rouge	LA	Consulting Retainer & Facebook Advertising, March 2019	3/11/2019	\$3,500.00
THE BAUTSCH GROUP	Baton Rouge	LA	Consulting - Fundraising Group	3/11/2019	\$4,325.00

LR3 CONSULTING, LLC	Baton Rouge	LA	Consulting Retainer - April, 2019: \$2,500.00; Facebook Advertising - April, 2019: \$1,500.00	4/23/2019	\$ 4,000.00
THE BAUTSCH GROUP CENTRAL LA DISTRICT LIVESTOCK SHOW	Baton Rouge	LA	Fundraising	4/23/2019	\$ 975.00
LR3 CONSULTING, LLC	Alexandria	LA	Donation	5/7/2019	\$ 1,356.75
LR3 CONSULTING, LLC	Baton Rouge	LA	Consulting Retainer - May, 2019: \$2,500.00; Facebook Advertising - May, 2019: \$1,500.00	5/7/2019	\$ 4,000.00
LR3 CONSULTING, LLC	Baton Rouge	LA	Digital Services	5/7/2019	\$ 3,000.00
RAPIDES PARISH REPUBLICAN WOMENS CLUB	Pineville	LA	Table Sponsorship	5/7/2019	\$ 750.00
REPUBLICAN LEGISLATIVE DELEGATION CAMPAIGN COMMITTEE	Baton Rouge	LA	2019 Elephant Stomp	5/7/2019	\$ 300.00
GOPAC ELECTION FUND REPUBLICAN EXECUTIVE COMMITTEE OF RAPIDES PARISH	Arlington	VA	Donation	6/7/2019	\$ 4,000.00
LR3 CONSULTING, LLC	ALEXANDRIA	LA	Donation	6/25/2019	\$ 750.00
LR3 CONSULTING, LLC	Baton Rouge	LA	Consulting Retainer Facebook Advertising	7/8/2019	\$ 4,000.00
LR3 CONSULTING, LLC	Baton Rouge	LA	Consulting Retainer Facebook Advertising	7/8/2019	\$ 4,000.00
HEBERT, CARBO & CRUTCHFIELD CPAS	Alexandria	LA	Accounting Fees for Campaign Reporting/Bookkeeping Services	8/20/2019	\$ 7,455.00
HOKUS POKUS LIQUORS	Alexandria	LA	Beverages for Fundraising Event	8/20/2019	\$ 590.24
JACQUIE'S CATERING	Alexandria	LA	Catering for Campaign Fundraiser	8/20/2019	\$ 526.73
LR3 CONSULTING, LLC	Baton Rouge	LA	Consulting Retainer	9/3/2019	\$ 4,000.00
RALPH ABRAHAM	Baton Rouge	LA	Campaign Contribution	9/13/2019	\$ 2,500.00

LR3 CONSULTING, LLC	Baton Rouge	LA	Facebook advertising; Digital Services; Video Production	10/17/2019	\$ 300.00
CHRIS LEOPOLD CAMPAIGN FUND	Belle Chasse	LA	Contribution to Campaign Fund	10/21/2019	\$ 1,000.00
KYLE ARDOIN CAMPAIGN	Baton Rouge	LA	campaign contribution	10/21/2019	\$ 2,500.00
MIKE "PETE" HUVAL CAMPAIGN	Breaux Bridge	LA	campaign contribution	10/21/2019	\$ 1,000.00
RANDY WIGGINS CAMPAIGN FUND	Alexandria	LA	campaign contribution	10/21/2019	\$ 2,500.00
RISPONE CAMPAIGN FOR GOVERNOR	Baton Rouge	LA	Campaign Contribution	10/22/2019	\$ 5,000.00
RIVER OAKS SQUARE ART CENTER	Alexandria	LA	Table sponsorship for Van Gogh Fundraiser	10/23/2019	\$ 750.00
RED RIVER BANK	Alexandria	LA	Bank Fee	1/22/2020	\$ 10.00
LR3 CONSULTING, LLC	Baton Rouge	LA	Graphid Design; Printing; Office supplies; Consulting	1/23/2020	\$ 2,650.00
RED RIVER BANK	Alexandria	LA	Bank Fee	1/23/2020	\$ 10.00
LR3 CONSULTING, LLC	Baton Rouge	LA	Consulting	3/10/2020	\$ 9,500.00
CENTRAL LA DISTRICT LIVESTOCK SHOW	Alexandria	LA	Charitable Contributions	4/20/2020	\$ 2,450.00
REPUBLICAN EXECUTIVE COMMITTEE OF RAPIDES PARISH	ALEXANDRIA	LA	Table Sponsorship for Reagan Dinner	6/3/2020	\$ 1,200.00
LR3 CONSULTING, LLC	Baton Rouge	LA	Policy Research	6/9/2020	\$ 10,000.00
LR3 CONSULTING, LLC	Baton Rouge	LA	Political Data, Facebook Advertising	6/17/2020	\$ 12,000.00
STATE REPRESENTATIVE LANCE HARRIS	Alexandria	LA	Postage for Mailout	7/7/2020	\$ 450.00
LR3 CONSULTING, LLC	Baton Rouge	LA	Consulting Services; Special Session Retainer	7/20/2020	\$ 5,000.00
LR3 CONSULTING, LLC	Baton Rouge	LA	Campaign Management	7/20/2020	\$ 3,000.00
STAND FOR TRUTH, INC	Fort Worth	TX	Independent Expenditure PAC	9/4/2020	\$ 120,000.00
STAND FOR TRUTH, INC	Fort Worth	TX	Independent Expenditure PAC	10/21/2020	\$ 6,500.00

RED RIVER BANK
DICKINSON WRIGHT PLLC

1

Alexandria	LA	Bank fees	10/21/2020	\$ 44.00
Troy	MI	Political Law Compliance	10/26/2020	\$ 1,000.00