



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

May 19, 2022

**Via Electronic Mail**

D. Eric Lycan  
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RE: MUR 7853  
Stand for Truth, Inc.

Dear Mr. Lycan:

On November 10, 2020, the Federal Election Commission notified your clients, Stand for Truth, Inc. and Hal Lambert, in his official capacity as Treasurer, of a complaint alleging violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was forwarded to your clients at that time.

After reviewing the allegations contained in the complaint and your clients' response, the Commission, on May 12, 2022, found reason to believe that your clients violated 52 U.S.C. § 30125(e)(1)(A). The Factual and Legal Analysis which formed the basis for the Commission's finding is enclosed for your information.

In order to expedite the resolution of this matter, the Commission has authorized the Office of the General Counsel to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Preprobable cause conciliation is not mandated by the Act or the Commission's regulations, but is a voluntary step in the enforcement process that the Commission is offering to you as a way to resolve this matter at an early stage and without the need for briefing the issue of whether or not the Commission should find probable cause to believe that your client violated the law.

If your client is interested in engaging in pre-probable cause conciliation, please contact Christopher S. Curran, the attorney assigned to this matter, at (202) 294-3097 or [ccurran@fec.gov](mailto:ccurran@fec.gov), within seven days of receipt of this letter. During conciliation, you may submit any factual or legal materials that you believe are relevant to the resolution of this matter. Because the Commission only enters into pre-probable cause conciliation in matters that it

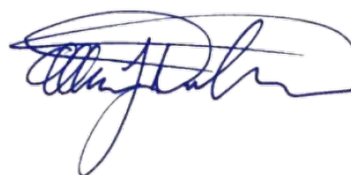
MUR 7853 (Stand for Truth, Inc.)  
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believes have a reasonable opportunity for settlement, we may proceed to the next step in the enforcement process if a mutually acceptable conciliation agreement cannot be reached within 30 days. *See* 52 U.S.C. § 30109(a), 11 C.F.R. Part 111 (Subpart A). Conversely, if you are not interested in pre-probable cause conciliation, the Commission may conduct formal discovery in this matter or proceed to the next step in the enforcement process. Please note that once the Commission enters the next step in the enforcement process, it may decline to engage in further settlement discussions until after making a probable cause finding.

Pre-probable cause conciliation, extensions of time, and other enforcement procedures and options are discussed more comprehensively in the Commission's "Guidebook for Complainants and Respondents on the FEC Enforcement Process," which is available on the Commission's website at [http://www.fec.gov/em/respondent\\_guide.pdf](http://www.fec.gov/em/respondent_guide.pdf).

We look forward to your response.

On behalf of the Commission,

A handwritten signature in blue ink, appearing to read "Allen J. Dickerson", written over a horizontal line.

Allen J. Dickerson  
Chairman

Enclosures  
Factual and Legal Analysis with Attachments

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

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

**MUR:** 7853

**I. INTRODUCTION**

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

The Complaint alleges that the \$120,000 included non-federal funds and that Stand for Truth’s receipt caused it to be “financed” by Harris within the meaning of 52 U.S.C § 30125(e).<sup>1</sup> And because Stand for Truth paid for research related to Harris’s federal candidacy and made an independent expenditure supporting Harris’s federal candidacy shortly after receiving the funds, the Complaint alleges that Harris, the State Committee and Stand for Truth violated the soft money prohibition of the Federal Election Campaign Act of 1971, as amended (the “Act”). The Complaint also alleges that Stand for Truth’s spending in support of Harris was coordinated, resulting in Stand for Truth making, and Lance Harris for Congress, Harris’s federal principal campaign committee (“Federal Committee”) accepting, a prohibited in-kind contribution.

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<sup>1</sup> Complaint at 2 (Oct. 30, 2020). The Complaint did not address the State Committee’s October 21, 2020 contribution.

1 Stand for Truth asserts that the State Committee’s funding was permissible and denies  
2 that there was coordination so as to render Stand for Truth’s subsequent spending in support of  
3 Harris an in-kind contribution.

4 For the reasons set forth below, Stand for Truth is an entity *established, financed,*  
5 *maintained or controlled* (“EFMC’d”) by Harris within the meaning of 52 U.S.C. § 30125(e).  
6 The Commission finds reason to believe that Stand for Truth, as an entity EFMC’d by Harris,  
7 violated 52 U.S.C. § 30125(e) by receiving and spending funds not subject to the limitations,  
8 prohibitions, and reporting requirements of the Act in connection with an election to Federal  
9 office.

## 10 **II. FACTUAL BACKGROUND**

11

### 12 **A. The State Committee’s “Expenditures” to Stand for Truth**

13 Lance Harris has been a member of the Louisiana House of Representatives since 2011.<sup>2</sup>  
14 Campaign to Elect Lance Harris is Harris’s state principal campaign committee.<sup>3</sup> According to  
15 the most recent information on file with the Louisiana Board of Ethics, in 2020, the State  
16 Committee received \$3,500.66 contributions from corporations; \$1,750 from limited liability  
17 companies (“LLCs”); \$12,500 from other PACs; and \$500 from individuals, for a total of  
18 \$18,250.66.<sup>4</sup> In 2019, the State Committee received \$13,500 in contributions from corporations,  
19 \$20,100 from LLCs, \$22,851 from other PACs, and \$23,940 from individuals for a total of

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<sup>2</sup> Louisiana House of Representatives, State Representative Lance Harris,  
[https://house.louisiana.gov/H\\_Reps/members?ID=25](https://house.louisiana.gov/H_Reps/members?ID=25).

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

<sup>4</sup> Three contributions occurred in 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.<sup>5</sup> Harris’s term ends in January 2024.<sup>6</sup> He has not filed a statement of candidacy for  
2 the 2023 Louisiana elections.<sup>7</sup>

3 Lance Harris filed his Statement of Candidacy on March 12, 2020.<sup>8</sup> His principal  
4 campaign committee, Lance Harris for Congress, filed its Statement of Organization on March  
5 12, 2020.<sup>9</sup>

6 Stand for Truth appears to have incorporated in Delaware on November 16, 2015, and it  
7 registered with the Commission as an independent expenditure-only committee on November 18,  
8 2015.<sup>10</sup> According to its website, it was established to “support conservative candidates like Ted  
9 Cruz” and solicited contributions to support Ted Cruz’s 2016 presidential bid.<sup>11</sup> Between  
10 November 17, 2015, and May 31, 2016, Stand for Truth reported \$11,289,466.83 in total receipts  
11 and spent \$10,864,378.89.<sup>12</sup> From June 1, 2016, until September 4, 2020, Stand For Truth’s

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<sup>5</sup> *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.*

<sup>6</sup> [https://house.louisiana.gov/H\\_Reps/members?ID=25](https://house.louisiana.gov/H_Reps/members?ID=25).

<sup>7</sup> Louisiana Secretary of State: Candidate Inquiry, <https://voterportal.sos.la.gov/candidateinquiry> (showing Lance Harris’s most recent Notice of Candidacy was filed on August 6, 2019 for the October 12, 2019 primary election).

<sup>8</sup> Statement of Candidacy, Lance Harris (Mar. 12, 2020), <https://docquery.fec.gov/pdf/906/202003129203824906/202003129203824906.pdf>.

<sup>9</sup> Statement of Organization, Lance Harris for Congress (Mar. 12, 2020), <https://docquery.fec.gov/pdf/226/202003129203825226/202003129203825226.pdf>.

<sup>10</sup> 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>.

<sup>11</sup> *Internet Archive*, WAYBACK MACHINE, <https://web.archive.org/web/20151214235431/http://standfortruthpac.com/>.

<sup>12</sup> *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 Report, Stand for Truth (June 20, 2016), <https://docquery.fec.gov/pdf/999/201606209018570999/201606209018570999.pdf>.

1 fundraising came to a virtual standstill, reporting no receipts and two refunds totaling \$838.50.<sup>13</sup>  
2 From March 3, 2016, until September 4, 2020, Stand for Truth made no independent  
3 expenditures.<sup>14</sup> On July 1, 2020, its cash-on-hand had fallen to \$5,639.20.<sup>15</sup>

4 On September 4, 2020 the State Committee reported a \$120,000 “expenditure” to Stand  
5 for Truth for “Independent Expenditure PAC.”<sup>16</sup> Five days later, Stand for Truth paid Go BIG  
6 Media, a Virginia-based media firm, \$12,500 for “research” relating to Harris.<sup>17</sup> 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.<sup>18</sup> On October 22,  
9 2020, Stand for Truth received another \$6,500 from the State Committee.<sup>19</sup> During the entire  
10 2020 election cycle, Stand for Truth’s only contributions came from the State Committee and its  
11 only independent expenditure was the \$89,500 spent in support of Harris.

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<sup>13</sup> 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>.

<sup>14</sup> 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](https://www.fec.gov/data/independent-expenditures/?data_type=processed&committee_id=C00592337&is_notice=true&most_recent=true) (last visited Aug. 24, 2021).

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

<sup>16</sup> 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>.

<sup>17</sup> October 2020 Quarterly Report, Stand for Truth (Oct. 15, 2020), <https://docquery.fec.gov/pdf/918/202010159294585918/202010159294585918.pdf>.

<sup>18</sup> *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.

<sup>19</sup> 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           **B.       The Complaint and Response**

2  
3           Based on the timeline of events concerning the State Committee’s transfer of funds to  
4 Stand for Truth and Stand for Truth’s subsequent spending of funds in support of Harris’s federal  
5 candidacy, the Complaint alleges that the Act was violated in a number of ways. *First*, the  
6 Complaint alleges that Harris and the State Committee transferred non-federal funds in violation  
7 of the Act’s soft money ban.<sup>20</sup> In support, the Complaint relies upon the fact that Stand for Truth  
8 had less than \$6,000 cash-on-hand when the State Committee contributed \$120,000.<sup>21</sup> As a  
9 result, the Complaint alleges that the Harris and the State Committee violated 52 U.S.C. §  
10 30125(e) by transferring funds not subject to the limitations, prohibitions, and reporting  
11 requirements of the Act (i.e., “non-federal funds”).<sup>22</sup> *Second*, the Complaint alleges that Stand  
12 for Truth, as an entity financed by Harris, violated 52 U.S.C. § 30125(e) by receiving and  
13 spending those non-federal funds.<sup>23</sup> *Third*, the Complaint alleges that Stand for Truth made, and  
14 the Federal Committee accepted, prohibited and unreported in-kind contributions because Stand  
15 for Truth’s reported research related to Harris (\$12,500) and television advertisement supporting  
16 Harris (\$89,500) were coordinated with Harris or his agents via the use of Go BIG Media, a  
17 common vendor.<sup>24</sup>

18           Stand for Truth’s Response makes three points. First, it denies making a coordinated  
19 communication and asserts that there is no evidence that it did so. Instead, Stand for Truth  
20 argues that the Complaint’s allegations are “conclusory” and interpreted so to fit the

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<sup>20</sup> Compl. at 6.

<sup>21</sup> *Id.* at 2, 6-7.

<sup>22</sup> *Id.* at 6-7 (“Count I”); *see also* 11 C.F.R. § 300.2(k) (defining “Non-Federal funds”).

<sup>23</sup> Compl. at 8-9 (“Count II”).

<sup>24</sup> *Id.* at 9-16 (“Count III”; “Count IV”; “Count V”).

1 Complainant’s narrative.<sup>25</sup> Their Response also states that Go BIG Media had adopted and  
2 implemented a firewall policy to prevent the sharing of material information, but did not provide  
3 a copy of the policy.<sup>26</sup> Second, Stand for Truth denies that it was EFMC’d by Harris or his  
4 *Federal* Committee and argues that the Complaint’s allegations are based on speculation.<sup>27</sup>  
5 Stand for Truth’s Response states that the Complaint gives no evidence that Lance Harris himself  
6 arranged for the funds to be contributed to Stand for Truth and argues that it is not surprising that  
7 someone involved in a past election committee would independently want to support the  
8 candidate again in the future.<sup>28</sup> Finally, Stand for Truth argues that because it had other  
9 individual contributors, its receipt of the State Committee’s one-time “donation” is insufficient to  
10 establish that Harris controls Stand for Truth.<sup>29</sup>

### 11 III. LEGAL ANALYSIS

#### 12 13 A. There is Reason to Believe that Stand for Truth Violated the Soft Money 14 Prohibition of the Act

##### 15 16 1. Legal Standard

17  
18 The Act and Commission regulations prohibit candidates, individuals holding Federal  
19 office, agents of a candidate or an individual holding Federal office, or an entity directly or  
20 indirectly *established, financed, maintained, or controlled* by or acting on behalf of one or more  
21 candidates or individuals holding Federal office from “solicit[ing], receiv[ing], direct[ing],  
22 transfer[ing], or spend[ing] funds in connection with an election for Federal office, including

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<sup>25</sup> Stand for Truth Resp. at 2.

<sup>26</sup> *Id.* at 3.

<sup>27</sup> *Id.* at 4.

<sup>28</sup> *Id.*

<sup>29</sup> *Id.* at 5.



1 funds for any Federal election activity, unless the funds are subject to the limitations,  
 2 prohibitions, and reporting requirements of this Act.”<sup>30</sup>

3 This prohibition reinforces 52 U.S.C § 30125(a)<sup>31</sup> by preventing federal candidates and  
 4 officeholders — who controlled the national committees of the political parties — from  
 5 circumventing the prohibitions applying to national committees by controlling ostensibly  
 6 separate entities that could accept and spend non-federal funds.<sup>32</sup>

7 The Commission defines the phrase *established, financed, maintained or controlled* by  
 8 examining a non-exhaustive list of ten affiliation factors set forth in 11 C.F.R. § 300.2(c)(2).  
 9 The factors “must be examined in the context of the overall relationship between the [candidate]  
 10 and the entity to determine whether the presence of any factor or factors is evidence that the  
 11 [candidate] directly or indirectly [EFMC’d] the entity.”<sup>33</sup> The ten factors are:

- 12
- 13 (i) A controlling interest in an entity’s voting stock or securities;
  - 14 (ii) Authority or ability to direct or participate in the governance of the entity,  
 15 “formal or informal;”
  - 16 (iii) Authority or ability to hire, appoint, demote, or otherwise control an  
 17 entity’s officers or other decision-making employees or members;
  - 18 (iv) Common or overlapping members with an entity;
  - 19 (v) Common or overlapping officers or employees with an entity;
  - 20 (vi) Having members, officers, or employees who were former members,  
 21 officers, or employees of an entity;
  - 22 (vii) Providing an entity “funds or goods in a significant amount or on an  
 23 ongoing basis” such as through direct and indirect payments for  
 24 administrative, fundraising, or other costs;
  - 25 (viii) Causing or arranging “funds or goods in a significant amount or on an  
 26 ongoing basis” to be provided to an entity;
  - 27 (ix) Having “an active or significant role in the formation of an entity;”

<sup>30</sup> 52 U.S.C § 30125(e)(1); 11 C.F.R. § 300.61.

<sup>31</sup> See *McConnell v. FEC*, 540 U.S. 93, 133 (2003) (“The remaining provisions of new FECA § 323 largely reinforce the restrictions in § 323(a)”).

<sup>32</sup> See *id.* at 121, 133.

<sup>33</sup> 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).

1 (x) Similar patterns of receipts or disbursements with an entity.<sup>34</sup>

2  
 3 2. Harris and the State Committee Appear to Have Financed Stand for Truth  
 4 with Non-Federal Funds

5  
 6 The Commission has determined that a state campaign committee of a federal candidate  
 7 is, as a matter of law, EFMC'd by the federal candidate and is acting on the candidate's behalf.<sup>35</sup>  
 8 Accordingly, Harris, a federal candidate, EFMC'd the State Committee. Because Harris  
 9 EFMC'd the State Committee, any funds the State Committee solicited, received, directed,  
 10 transferred, or spent in connection with a federal election after Harris became a federal candidate  
 11 were required to be federally permissible.<sup>36</sup>

12 The State Committee's disclosure reports reveal that it accepted contributions from  
 13 corporations. Since 2016, the State Committee accepted a total of \$53,851.37 from PACs,  
 14 \$30,251 from corporations, \$25,690 from individuals, \$23,050 from LLCs whose tax status is  
 15 unknown, \$1,000 from a family trust, \$500 from a federal campaign committee, and \$250 from a  
 16 partnership.<sup>37</sup> Thus, it appears that some portion of the funds provided to the Stand for Truth  
 17 after Harris became a federal candidate were funds that did not comply with the Act's source  
 18 prohibitions.<sup>38</sup>

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<sup>34</sup> 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).

<sup>35</sup> See Factual & Legal Analysis at 9, MUR 6601 (Oelrich for Congress).

<sup>36</sup> Advisory Opinion 2003-32 (Tenenbaum) at 4 (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).

<sup>37</sup> See Attach. 2.

<sup>38</sup> 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.").

1           The key factor in determining whether Harris financed Stand for Truth turns on whether  
2 the State Committee provided funds in a “significant amount or on an ongoing basis” to Stand  
3 for Truth.<sup>39</sup> In determining whether an amount is “significant” under 11 C.F.R.  
4 § 300.2(c)(2)(vii), the Commission has considered what percentage of the entity’s total receipts  
5 the funding represents.<sup>40</sup> The Commission has explained that providing amounts that are so  
6 large or comprise a substantial percentage of an entity’s receipts would qualify as being a  
7 “significant amount.”<sup>41</sup>

8           Whether funds provided to an entity qualify as “significant” under 11 C.F.R.  
9 § 300.2(c)(2)(vii) and whether the receiving entity should, in turn, be considered to have been  
10 EFMC’d by a candidate or officeholder is determined by the Commission “on a case-by-case  
11 basis and in view of all the relevant circumstances.”<sup>42</sup> For example, in AO 2006-04, the  
12 Commission determined that a federal candidate’s proposed donation to a state ballot-initiative  
13 committee that would constitute 50% of the committee’s total receipts at the time of the donation  
14 “must be considered ‘a significant amount’” under 11 C.F.R. § 300.2(c)(vii) such that the federal  
15 candidate “financed” the state committee.<sup>43</sup> In considering whether a donation of 25% (up to  
16 \$50,000) of the organization’s total receipts at the time of the donation would constitute “a  
17 significant amount,” the Commission said that the donation “must be examined in the context of

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<sup>39</sup> 11 C.F.R. § 300.2(c)(2)(vii).

<sup>40</sup> See Advisory Opinion 2004-29 (Akin) at n.4 and Advisory Opinion 2004-25 (Corzine) at 4.

<sup>41</sup> *Id.*

<sup>42</sup> See Advisory Opinion 2006-04 (Tancredo) at 4 (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).

<sup>43</sup> AO 2006-04 at 4.

1 the overall relationship” between the committee and the entity.<sup>44</sup> In this analysis, the  
2 Commission considered the impact of “seed money” to be important in the context of the overall  
3 relationship and the question of whether the entity was financed under the Act. The Commission  
4 concluded that a donation of up to \$50,000 when the entity had just a little more than \$9,000  
5 “would represent substantial ‘seed money’ for [the entity] and would result in [the entity]  
6 depending in large part on [the candidate] for its initial existence.”<sup>45</sup>

7 In the enforcement context, the Commission also considers the various facts and  
8 circumstances of a particular matter in analyzing whether an entity was financed within the  
9 meaning of section 300.2(c)(2)(vii). In MUR 5367, the Commission determined that Darrell  
10 Issa’s provision — both individually and *through an organization* he controlled with his spouse  
11 — of more than \$1.76 million (over 60% of the receipts) to a state ballot measure committee,  
12 constituted a “significant amount.”<sup>46</sup>

13 Instead of a strict lifetime receipts-only rule, the Commission’s regulation envisages a  
14 “situation-specific approach.”<sup>47</sup> Here, when examined in the context of the overall relationship  
15 between Harris, the State Committee, and Stand for Truth, the record indicates that the State  
16 Committee’s provision of \$126,500 qualifies as a “significant amount” under 11 C.F.R.  
17 § 300.2(c)(2)(vii). Although Stand for Truth was first established in 2015 and received over \$11  
18 million in contributions through May 2016, Stand for Truth raised no funds over a four-year  
19 period from June 2016, until September 4, 2020, and was largely a dormant organization by

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<sup>44</sup> *Id.*

<sup>45</sup> *Id.*

<sup>46</sup> 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.

<sup>47</sup> Prohibited and Excessive Contributions: Non-Federal Funds or Soft Money, 67 Fed. Reg. 49064, 49084 (July 29, 2002).

1 2018, reporting no receipts and only \$2,543 in disbursements for legal fees that year. And from  
2 July 1, 2020, until September 4, 2020, Stand for Truth’s cash-on-hand was only \$5,639.20.<sup>48</sup>  
3 Thus, the State Committee’s provision of \$120,000 on September 4, 2020, represented 95.5% of  
4 Stand for Truth’s total receipts at that time.<sup>49</sup> The State Committee’s additional \$6,500  
5 contribution on October 22, 2020 only increases the proportion. In fact, the State Committee’s  
6 contributions were the only contributions that Stand for Truth received since 2016.<sup>50</sup> And for the  
7 entire 2020 election cycle, the only independent expenditure that Stand for Truth made was the  
8 \$89,000 ad supporting Harris, which was funded by the State Committee.<sup>51</sup>

9         The Commission has never established a funding floor, either in terms of dollar amount  
10 or percentage of receipts, under which an organization will be deemed *per se* not to have been  
11 financed by another entity. Indeed, when the Commission promulgated 11 C.F.R.  
12 § 300.2(c)(2)(vii), it rejected carving out a \$5,000 *de minimis* exception as contrary to the  
13 regulation and plain meaning of the Act.<sup>52</sup> And, clearly, \$120,000 is much more than the  
14 proposed and rejected \$5,000 exception. Nor has Commission established a specific timeframe  
15 for considering whether an organization is financed under 11 C.F.R. § 300.2(c)(2)(vii). The fact  
16 that a sponsor may request a Commission determination that it is *no longer* deemed to finance an

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<sup>48</sup> See Attach. 3.

<sup>49</sup> It is true that here, unlike some prior matters, the State Committee’s funding of Stand for Truth represented a small amount of Stand for Truth’s *lifetime* receipts. 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., Advisory Opinion 2006-04 (Tancredo) at 4; First Gen. Counsel’s Rpt. at 10, MUR 7006 (Heaney for Congress, *et al.*).

<sup>50</sup> See Attach. 3. Stand for Truth did receive two refunds totaling \$838.50 between from June 1, 2016 until September 4, 2020.

<sup>51</sup> See Attach. 3.

<sup>52</sup> Prohibited and Excessive Contributions: Non-Federal Funds or Soft Money, 67 Fed. Reg. 49064, 49084 (July 29, 2002).

1 entity demonstrates that the Commission recognized that at different times different relationships  
2 may exist.<sup>53</sup> These facts, when taken together, and coupled with the information described  
3 above, sufficiently indicate at the preliminary stage of administrative enforcement that Harris  
4 and the State Committee “financed” Stand for Truth within the meaning of the Act and  
5 Commission regulations.<sup>54</sup>

6 In sum, the State Committee was EFMC’d by Harris, and at this stage, the information  
7 indicates that the Harris and State Committee financed Stand for Truth because the provision of  
8 \$126,500 to Stand for Truth qualifies as a “significant amount” under 11 C.F.R.  
9 § 300.2(c)(2)(vii). Because the \$126,500 appears to include non-federal funds not subject to the  
10 reporting requirements of the Act and was received and spent by Stand for Truth in connection  
11 with an election for Federal office, the Commission finds reason to believe that Stand for Truth  
12 violated 52 U.S.C. § 30125(e)(1)(A).

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<sup>53</sup> See 11 C.F.R. § 300.2(c)(4).

<sup>54</sup> 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.”).

<b>Campaign to Elect Lance Harris - Financial Summary</b>				
<b>Coverage Period</b>	<b>Funds on Hand at Beginning</b>	<b>Funds on Hand at Close</b>	<b>Total Contributions</b>	<b>Total Disbursements</b>
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

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**Campaign to Elect Lance Harris - Contributors**

<b>Contributor Name</b>	<b>Address</b>	<b>City</b>	<b>State</b>	<b>Date</b>	<b>Amount</b>	<b>Entity</b>
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	Alexandria	LA	2/26/2019	\$250.00	Individual
JASON E COBB	Alexandria	LA	2/26/2019	\$250.00	Individual
JOHN TUDOR	Alexandria	LA	2/26/2019	\$1,000.00	Individual
KYLE DOWNS	Alexandria	LA	2/26/2019	\$2,000.00	Individual
LANCE E TEMPLETON	Alexandria	LA	2/26/2019	\$1,000.00	Individual
MARION CHANEY	Alexandria	LA	2/26/2019	\$250.00	Individual
MICHAEL MADISON	Shreveport	LA	2/26/2019	\$2,500.00	Individual
RANDALL WELCH	Jena	LA	2/26/2019	\$1,000.00	Individual
RENEE MADDOX	Boyce	LA	2/26/2019	\$250.00	Individual
REYMOND MEADAA	Alexandria	LA	2/26/2019	\$1,000.00	Individual
SAMUEL T MAHFOUZ	Alexandria	LA	2/26/2019	\$2,500.00	Individual
SCOTT BRAME	Alexandria	LA	2/26/2019	\$250.00	Individual
STEPHEN D DOWNS	Alexandria	LA	2/26/2019	\$250.00	Individual
WALTER WARWICK	Alexandria	LA	2/26/2019	\$500.00	Individual
MATTHEW RITCHIE	Pineville	LA	3/14/2019	\$1,000.00	Individual
ALICE G YOUNG	Alexandria	LA	8/19/2019	\$25.00	Individual
ARTHUR NESOM	Glenmora	LA	8/19/2019	\$50.00	Individual
BART A SCHMOLKE	Boyce	LA	8/19/2019	\$200.00	Individual
C C PROVINCE	Alexandria	LA	8/19/2019	\$100.00	Individual
DALE G HARRINGTON	Alexandria	LA	8/19/2019	\$50.00	Individual
DAVID CARLTON	Alexandria	LA	8/19/2019	\$250.00	Individual
EDWARD RUNDELL	Alexandria	LA	8/19/2019	\$500.00	Individual
GREG BAKER	Alexandria	LA	8/19/2019	\$500.00	Individual
IRENE SAUCIER	Alexandria	LA	8/19/2019	\$25.00	Individual
JAMES G DELEE	Alexandria	LA	8/19/2019	\$100.00	Individual
JANE PIPPINS	Woodworth	LA	8/19/2019	\$10.00	Individual
JOAN BRUNSON	Alexandria	LA	8/19/2019	\$200.00	Individual
JUDITH MADDEN	Alexandria	LA	8/19/2019	\$100.00	Individual
LEE A ROY	Boyce	LA	8/19/2019	\$25.00	Individual
LYDIA G GRAYSON	Alexandria	LA	8/19/2019	\$50.00	Individual
LYN G GOODIN	Alexandria	LA	8/19/2019	\$100.00	Individual
MARGUERITE MCNEELY	Hineston	LA	8/19/2019	\$200.00	Individual
MARIE EDDLEMON	Hineston	LA	8/19/2019	\$30.00	Individual
PATTIE PEBBLES	Alexandria	LA	8/19/2019	\$100.00	Individual
PHILLIS BROUSSARD	Woodworth	LA	8/19/2019	\$25.00	Individual
R A MONSUR	Boyce	LA	8/19/2019	\$50.00	Individual
R D JACKSON	Alexandria	LA	8/19/2019	\$50.00	Individual
R G COTTON	Alexandria	LA	8/19/2019	\$100.00	Individual
RENEE MADDOX	Boyce	LA	8/19/2019	\$500.00	Individual
ROBERT HOLLINGSWORTH	Alexandria	LA	8/19/2019	\$50.00	Individual
RYAN RICHE	Lecompte	LA	8/19/2019	\$50.00	Individual
STEVEN COOK	Alexandria	LA	8/19/2019	\$100.00	Individual
DEBORAH RANDOLPH	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	Baton Rouge	LA	3/6/2020	\$2,500.00	PAC
LASFAA PAC, INC.	Baton Rouge	LA	3/9/2020	\$1,000.00	PAC
HOSPAC	Baton Rouge	LA	10/20/2020	\$2,500.00	PAC
HOSPAC	Baton Rouge	LA	10/20/2020	\$2,500.00	PAC
JONES WALKER LLP	Baton Rouge	LA	3/14/2019	\$250.00	Partnership
THE JONATHAN E. MARTIN FAMILY TRUST	Alexandria	LA	3/14/2019	\$1,000.00	Trust

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<b>Stand for Truth - Financial Summary</b>				
<b>Report Coverage</b>	<b>Beginning Cash-on-Hand</b>	<b>Ending Cash-on-Hand</b>	<b>Total Receipts</b>	<b>Total Disbursements</b>
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	\$ -	\$ -
<b>Total</b>			<b>\$ 11,416,785.33</b>	<b>\$ 11,387,070.53</b>

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
HEBERT, CARBO & CRUTCHFIELD CPAS	Baton Rouge	LA	Consulting Retainer Facebook Advertising	7/8/2019	\$ 4,000.00
HOKUS POKUS LIQUORS	Alexandria	LA	Accounting Fees for Campaign Reporting/Bookkeeping Services	8/20/2019	\$ 7,455.00
JACQUIE'S CATERING	Alexandria	LA	Beverages for Fundraising Event	8/20/2019	\$ 590.24
LR3 CONSULTING, LLC	Alexandria	LA	Catering for Campaign Fundraiser	8/20/2019	\$ 526.73
RALPH ABRAHAM	Baton Rouge	LA	Consulting Retainer	9/3/2019	\$ 4,000.00
	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 &quot;PETE&quot; 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	Alexandria	LA	Bank fees	10/21/2020	\$ 44.00
DICKINSON WRIGHT PLLC	Troy	MI	Political Law Compliance	10/26/2020	\$ 1,000.00

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