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August 9, 2022

Federal Election Commission  
 1050 First Street NE  
 Washington, DC 20463

VIA E-MAIL

Re: **MUR 7853 Reason-To-Believe Determination**

Dear Vice Chair Lindenbaum,

We represent Lance Harris, Lance Harris for Congress, Campaign to Elect Lance Harris, and Blaine Hebert, in his official capacity as Treasurer (collectively “the Respondents”) in the above-referenced matter. We are taking the unusual approach of writing to you directly because the Factual and Legal Analysis (“F&LA”) in this matter finding reason-to-believe against the Respondents is contrary to Commission precedent and overly punitive. OGC asserts that Campaign to Elect Lance Harris (“the State Committee”) was an entity established, financed, maintained, or controlled (EFMC’d) by Harris, and therefore, the transfer of funds to Stand for Truth was considered a direction of soft money by a candidate. However, OGC, in coming to this conclusion, ignores relevant facts about Representative Harris disassociating from Campaign to Elect Lance Harris long before State Committee’s contribution to Stand for Truth.

As such, we have significant concerns with the Commission’s determination in this matter, as well as the reasoning that supports such determination. Attached is the response we provided to the Office of General Counsel (“OGC”) on June 22, 2022 that explains our reasoning. We hope that the Commission will review this response and reconsider its determination on this matter before the Respondents move forward with conciliation with OGC, or at a minimum, significantly reduce the penalty in conciliation, as found in our initial counter-offer.

Should you have any questions or concerns regarding our letter, please let us know at [cspies@dickinson-wright.com](mailto:cspies@dickinson-wright.com) or [kreynolds@dickinson-wright.com](mailto:kreynolds@dickinson-wright.com).

Respectfully submitted,

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*Counsel to Respondents*