



FEDERAL ELECTION COMMISSION
Washington, DC 20463

March 22, 2023

Via Electronic Mail

Charles Spies
Benjamin Mehr
Dickinson Wright PLLC
1825 Eye Street, NW Suite 900
Washington, DC 20006
cspies@dickinsonwright.com
bmehr@dickinsonwright.com

RE: MUR 7853
Lance Harris, *et al.*

Dear Mr. Spies and Mr. Mehr:

On March 15, 2023, the Federal Election Commission accepted the signed conciliation agreement submitted on your clients' behalf in settlement of a violation of 52 U.S.C. § 30125(e), a provision of the Federal Election Campaign Act of 1971, as amended (the "Act").

The Commission reminds you that the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A) still apply, and that this matter is still open. The Commission will notify you when the entire file has been closed.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the effective date of the conciliation agreement. If you have any questions, please contact me at (202) 694-1362.

Sincerely,

Christopher S. Curran

Christopher S. Curran
Staff Attorney

Enclosure
Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the matter of)	
)	
Lance Harris)	MUR 7853
Campaign to Elect Lance Harris and)	
Blaine Hebert in his official capacity)	
as treasurer)	

CONCILIATION AGREEMENT

The Commission found reason to believe that Lance Harris and Campaign to Elect Lance Harris (“State Committee”), Harris’s state principal campaign committee (collectively “Respondents”), violated 52 U.S.C. § 30125(e)(1)(A) by transferring funds that were not subject to the limitations, prohibitions, and reporting requirements of the Federal Election Campaign Act of 1971, as amended (the “Act”) in connection with an election to Federal office.

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

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 52 U.S.C. § 30109(a)(4)(A)(i).

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Campaign to Elect Lance Harris is the state campaign committee for Louisiana State Representative Lance Harris. Between January 1, 2016 and October 22, 2020,

the State Committee received contributions that were not subject to the limitations, prohibitions, and reporting requirements of the Act.

2. Stand for Truth, Inc. is an independent expenditure-only political committee registered with the Commission.

3. On March 12, 2020, Harris filed a Statement of Candidacy to run for the Fifth Congressional District in Louisiana and became a federal candidate.

4. On September 4, 2020, the State Committee contributed \$120,000 to Stand for Truth.

5. On October 22, 2020, the State Committee contributed \$6,500 to Stand for Truth.

6. At the time it received the \$120,000, Stand for Truth's cash-on-hand was \$5,639.20. At the time it received the \$6,500, Stand for Truth's cash-on-hand was \$23,629.20.

7. The contributions Campaign to Elect Lance Harris made to Stand for Truth represent the only contributions Stand for Truth received during the 2020 election cycle and the first contributions it received since May 16, 2016.

8. On September 9, 2020, Stand for Truth paid Go BIG Media \$12,500 for "research" in connection with Lance Harris's Federal candidacy.

9. On September 24, 2020, Stand for Truth paid Go BIG Media \$89,500 for an independent expenditure supporting Lance Harris's Federal candidacy.

10. The Act prohibits federal candidates and officeholders, their agents and entities directly or indirectly established, financed, maintained or controlled by or acting on behalf of one or more candidates or individuals holding office from receiving or spending funds

in connection with an election for Federal office unless the funds are subject to the limitations, prohibitions, and reporting requirements of the Act. 52 U.S.C. § 30125(e)(1)(A).

11. To determine whether a sponsor directly or indirectly established, finances, maintains, or controls an entity, the factors described in 11 C.F.R. § 300(c)(2)(i) through (x) are examined in the context of the overall relationship between the sponsor and the entity. 11 C.F.R. § 300.2(c)(2).

12. As a state campaign committee of a Federal candidate, the State Committee is an entity established, financed, maintained, or controlled by Lance Harris and acted on his behalf.

13. Respondents contend that Harris was not involved with the decision to contribute to Stand for Truth. Furthermore, Respondents contend that Harris' signature on the State Committee's campaign reports filed with the Louisiana Ethics Board was required by Louisiana state law.

V. Respondents violated 52 U.S.C. § 30125(e)(1)(A) by transferring funds to Stand for Truth in connection with an election to Federal office that were not subject to the limitations, prohibitions, and reporting requirements of the Act.

VI. Respondents will take the following actions:

1. Respondents will pay a combined civil penalty to the Commission in the amount of Nineteen Thousand, Nine Hundred Dollars (\$19,900), pursuant to 52 U.S.C. § 30109(a)(5)(A).

2. Respondents will cease and desist from committing violations of 52 U.S.C. § 30125(e)(1)(A).

VII. The Commission, on request of anyone filing a complaint under 52 U.S.C.

MUR 7853 (Lance Harris & Campaign to Elect Lance Harris)
 Conciliation Agreement
 Page 4 of 4

§ 30109(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

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

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

FOR THE COMMISSION:

Lisa J. Stevenson
 Acting General Counsel


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

Digitally signed by
 Charles Kitcher
 Date: 2023.03.22
 13:01:59 -04'00'

3/22/23

Date

FOR THE RESPONDENT:


 Katie Reynolds
 Counsel

2/14/23

Date