



FEDERAL ELECTION COMMISSION
Washington, DC 20463

June 7, 2023

Via Electronic Mail

Eric Lycan
Embry Merritt Shaffar Womack, PLLC
Chase Tower
201 East Main Street Suite 1402
Lexington, KY 40507
eric.lycan@emswlaw.com

RE: MUR 7853
Stand for Truth

Dear Mr. Lycan:

On May 31, 2023, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's 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. On that date the Commission closed the file in the matter.

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) 294-3097.

Sincerely,

Christopher S. Curran

Christopher S. Curran
Staff Attorney

Enclosure
Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the matter of)	
)	
Stand for Truth, Inc.)	MUR 7853
and Hal Lambert in his official)	
capacity as treasurer)	

CONCILIATION AGREEMENT

The Commission found reason to believe that Stand for Truth, Inc. and Hal Lambert in his official capacity as treasurer (“Stand for Truth” or “Respondent”) violated 52 U.S.C. § 30125(e)(1)(A) by receiving and spending funds that were not subject to the limitations, prohibitions, and reporting requirements of the Federal Election Campaign Act of 1971, as amended (the “Act”) and used in connection with a federal election.

NOW, THEREFORE, the Commission and the Respondent, 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 Respondent 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. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Stand for Truth is an independent expenditure-only political committee that filed a Statement of Organization with the Commission on November 18, 2015. Hal Lambert is the treasurer of Stand for Truth.

2. Campaign to Elect Lance Harris (“State Committee”) 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.

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 October 15, 2020, Stand for Truth filed its 2020 October Quarterly Report with the Commission disclosing that it received a \$120,000 contribution from Campaign to Elect Lance Harris on September 4, 2020.

5. On December 3, 2020, Stand for Truth filed its 30-Day Post-Election Report with the Commission disclosing that it received a \$6,500 contribution from Campaign to Elect Lance Harris on October 22, 2020.

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

7. The contributions received from Campaign to Elect Lance Harris represent the only contribution 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 establishes, finances, maintains, or controls an entity, the factors described in 11 C.F.R. § 300.2(c)(2)(i) through (x) are examined in the context of the overall relationship between sponsor and the entity. 11 C.F.R. § 300.2(c)(2). Factors indicating that a sponsor directly or indirectly finances an entity include whether a sponsor, directly or through its agent, provides funds or goods in a significant amount or on an ongoing basis to the entity or whether a sponsor, directly or through its agent, causes or arranges for funds in a significant amount or on an ongoing basis to be provided to the entity. *See* 11 C.F.R. § 300.2(c)(2)(vii), (viii).

12. As a state campaign committee of a federal candidate, the State Committee was established, financed, maintained, or controlled by Harris, a federal candidate, and acted on his behalf.

13. By accepting the contributions totaling \$126,500, described in paragraphs IV. 4 and 5, which constituted a significant amount of funds, Stand for Truth became financed by Harris.

14. Stand For Truth contends that the State Committee represented that Harris had disassociated himself with the State Committee and had no involvement with the proposed contribution, prior to Stand for Truth accepting the contribution. Stand for Truth further contends it was given incorrect legal advice (not by undersigned counsel) and did not intend to violate the Act.

V. Stand for Truth violated 52 U.S.C. § 30125(e)(1)(A) by receiving and spending non-federal funds in connection with a federal election.

VI. Respondent will take the following actions:

1. Respondent will pay a 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. Respondent 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. § 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. Respondent 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

MUR 7853 (Stand for Truth, Inc.)
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Acting General Counsel


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

Digitally signed by
Charles Kitcher
Date: 2023.06.02
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6/2/23

Date

FOR THE RESPONDENT:


D. Eric Lycan, Esq.
(Position)

4/18/2023

Date