

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

MUR 8148

DATE COMPLAINT FILED: July 17, 2023

DATE OF NOTIFICATIONS: July 20, 2023

LAST RESPONSE RECEIVED: Oct. 4, 2023

DATE ACTIVATED: Aug. 22, 2024

[REDACTED]

STATUTE OF LIMITATIONS: Mar. 2, 2028-
May 1, 2028

ELECTION CYCLE: 2024

COMPLAINANT:

Ralph King

RESPONDENTS:

Frank LaRose

LaRose for Senate and Lisa Lisker in her official
capacity as treasurer

Leadership for Ohio Fund and Dustin McIntyre in
his official capacity as treasurer

**RELEVANT STATUTES
AND REGULATIONS:**

52 U.S.C. § 30101(4)(A)

52 U.S.C. § 30102(e)(1)

52 U.S.C. § 30103(a)

52 U.S.C. § 30125(e)(1)(A)

11 C.F.R. § 100.5

11 C.F.R. § 101.1(a)

11 C.F.R. § 102.1(a)

11 C.F.R. § 300.61

INTERNAL REPORTS CHECKED:

Disclosure Reports

FEDERAL AGENCIES CHECKED:

[REDACTED]

I. INTRODUCTION

This matter arises from a Complaint alleging that Frank LaRose became a federal candidate on or before May 1, 2023, and therefore filed his Statement of Candidacy late on July 17, 2023, in violation of the Federal Election Campaign Act of 1971, as amended (the "Act"). The Complaint argues that LaRose became a candidate in May based on communications he made to potential donors starting in May 2023 when he solicited contributions to Leadership for Ohio Fund, then a 527 organization, which was allegedly formed

1 to support LaRose's candidacy. This claim also raises the possibility that LaRose's campaign
2 committee, LaRose for Senate and Lisa Lisker in her official capacity as treasurer (the
3 "Committee"), filed its Statement of Organization late on July 17, 2023. The Complaint further
4 alleges that, during the two-and-a-half-month period when LaRose was a candidate but failed to
5 timely register, LaRose solicited donations outside the amount limitations and source
6 prohibitions of the Act to Leadership for Ohio Fund to support his candidacy, in violation of the
7 soft money provision of the Act and Commission regulations. The Complaint also alleges that
8 Leadership for Ohio Fund, which registered with the Commission as an independent
9 expenditure-only political committee on July 15, 2024, funded a "push poll" in support of
10 LaRose prior to registering with the Commission, raising the allegation that it was engaged in
11 federal election activity before it registered with the Commission and thus failed to timely file as
12 a political committee.

13 The Response from LaRose and the Committee asserts that LaRose timely filed his
14 Statement of Candidacy, contending that he was focused on promoting election initiatives and
15 that any discussion on a potential run for U.S. Senate was ambiguous. The Response also
16 contends that, although LaRose solicited donations to Leadership for Ohio Fund, this activity
17 was to promote his work as Ohio Secretary of State and election initiatives; thus, it was not in
18 connection with a federal election and accordingly did not result in soft money solicitations.
19 Additionally, the Response argues that the prohibition on soliciting soft money contributions did
20 not apply because LaRose was not a federal candidate at the time he made the solicitations.
21 Finally, LaRose avers that he did not control or direct Leadership for Ohio Fund. The Response

1 on behalf of Leadership for Ohio Fund contends that it did not engage in any activities regulated
2 by the Commission prior to it registering with the Commission.

3 As explained below, although the Complaint points to certain statements and activity that
4 it contends indicate that LaRose intended to run as of May 2023, there does not appear to be
5 information, whether in the Complaint, the Committee's filings, or public sources, to indicate
6 that LaRose exceeded the \$5,000 threshold before he filed his Statement of Candidacy.

7 Accordingly, we recommend that the Commission dismiss the allegations that LaRose violated
8 52 U.S.C. § 30102(e)(1) and 11 C.F.R. § 101.1(a) by failing to timely file a Statement of
9 Candidacy and that the Committee violated 52 U.S.C. § 30103(a) and 11 C.F.R. § 102.1(a) by
10 failing to timely file a Statement of Organization. Because the available information does not
11 establish that LaRose was a candidate prior to July 17, 2023, we also recommend that the
12 Commission dismiss the allegation that LaRose solicited soft money in violation of 52 U.S.C.
13 § 30125(e)(1)(A) and 11 C.F.R. § 300.61. Finally, we recommend that the Commission dismiss
14 the allegation that Leadership for Ohio Fund failed to timely register and file reports with the
15 Commission in violation of 52 U.S.C. §§ 30103, 30104 and 11 C.F.R. §§ 102.1(d) and 104.1
16 given that we are aware of no information establishing that it engaged in federal election activity
17 prior to registering with the Commission.

18 **II. FACTUAL BACKGROUND**

19 Frank LaRose was a candidate in the Ohio Republican senatorial primary election.¹
20 LaRose for Senate is LaRose's principal campaign committee.² Leadership for Ohio Fund

¹ Frank LaRose, Statement of Candidacy (July 17, 2023), <https://docquery.fec.gov/pdf/836/202307179583764836/202307179583764836.pdf>.

² LaRose for Senate, Statement of Organization at 1 (July 17, 2023), <https://docquery.fec.gov/pdf/832/202307179583764832/202307179583764832.pdf>.

1 registered with the IRS as a 527 organization on March 3, 2023, and then with the Commission
 2 as an independent expenditure-only political committee on July 15, 2023.³ Leadership for Ohio
 3 Fund's Notice of Section 527 Status states that the organization's purpose is "[t]o engage in
 4 exempt function activities in Ohio."⁴

5 The Complaint alleges that LaRose failed to timely file his Statement of Candidacy
 6 because he became a candidate on or before May 1, 2023, and thus should have filed his
 7 Statement of Candidacy by May 16, 2023.⁵ Additionally, the Complaint alleges that the
 8 Committee should have filed its Statement of Organization within ten days after that, or by
 9 May 26, 2023. The Complaint cites to articles reporting that LaRose left voice messages with
 10 potential donors stating "I am preparing to, hopefully soon, announce my candidacy for this
 11 office" and "I am actively working towards and hope to soon announce my candidacy for the
 12 U.S. Senate."⁶ The Complaint also claims that LaRose raised funds for Leadership for Ohio
 13 Fund to support his candidacy and, as explained below, the Complaint alleges that Leadership for
 14 Ohio Fund engaged in activity that supported his candidacy starting in May 2023.⁷ Additionally,
 15 the Complaint provides a copy of a flyer that states that LaRose "Can Win" in the general
 16 election, describing him as a "potential candidate" and states the mission of the flyer's author is

³ Leadership for Ohio Fund, IRS Form 8871 (Political Organization Notice of Section 527 Status) (Mar. 3, 2023) [hereinafter Leadership for Ohio Fund, Form 8871], <https://forms.irs.gov/app/pod/basicSearch/downloadFile?formId=119753&formType=e8871>; Leadership for Ohio Fund, Statement of Organization at 1 (July 15, 2023), <https://docquery.fec.gov/pdf/011/202307159583163011/202307159583163011.pdf>.

⁴ Leadership for Ohio Fund, Form 8871.

⁵ Compl. at 1 (July 17, 2023).

⁶ *Id.* at 2-3; Henry J. Gomez, *Ohio Secretary of State Tells Donors He'll Enter GOP Senate Primary 'Soon'*, NBC NEWS (May 9, 2023), <https://www.nbcnews.com/politics/2024-election/ohio-secretary-state-frank-larose-eyes-gop-senate-primary-race-rcna83576> (cited in Compl. at 2).

⁷ Compl. at 8; Gomez, *supra* note 6.

to “Beat Sherrod Brown.”⁸ The Complaint alleges that LaRose or his agents disseminated the flyer; however, the Complaint does not explain how the Complainant obtained the flyer or how it was distributed.⁹

The Complaint argues that, because LaRose was a candidate, the Act prohibited him from raising soft money for Leadership for Ohio Fund.¹⁰ The Complaint does not allege how much LaRose solicited for Leadership for Ohio Fund, but in its initial amended filing with the IRS, it reported raising \$1,023,877 in a four-month period.¹¹ Additionally, the Complaint asserts that LaRose’s solicitations for Leadership for Ohio Fund were intended to benefit his candidacy because Leadership for Ohio Fund spent funds conducting a “push poll in favor of LaRose.”¹² The Complaint cites to an article in the *Washington Examiner* reporting that Causeway Solutions conducted the poll for Leadership for Ohio Fund.¹³ The article notes that it obtained the poll and that it shows LaRose with a lead in the primary if he chose to run, but the article links only to a two-page summary document that does not include the questions asked to participants.¹⁴

LaRose and the Committee filed a joint Response asserting that LaRose first actively considered a run for Senate around July 4, 2023, and ultimately announced his candidacy on

⁸ Compl. at 7 & Ex. 1.

⁹ *Id.* at 2.

¹⁰ *Id.* at 1-2.

¹¹ Leadership for Ohio Fund, IRS Form 8872 (Initial Amended Report 2023) (Aug. 2, 2023) [hereinafter Leadership for Ohio Fund, Form 8872], <https://forms.irs.gov/app/pod/basicSearch/downloadFile?formId=141818&formType=e8872>. Additionally, the initial amended report filed to the IRS discloses contributions greater than the contribution limit to a candidate and from possible prohibited sources. *Id.* at 5.

¹² Compl. at 9-10.

¹³ Reese Gorman, *Undeclared Frank LaRose Leads Ohio Senate Republican Primary Race, Poll Says*, WASH. EXAMINER (June 7, 2023), <https://www.washingtonexaminer.com/news/2583938/undeclared-frank-larose-leads-ohio-senate-republican-primary-race-poll-says/> (cited in MUR 8148 Compl. at 3).

¹⁴ *Id.*

1 July 17, 2023.¹⁵ Additionally, the Committee did not report contributions or expenditures
 2 exceeding \$5,000 until July 17, 2023.¹⁶ In a declaration, LaRose attests that, prior to July 4,
 3 2023, he occasionally mentioned to supporters that he hoped to run for Senate but took no action
 4 to qualify for the ballot or raise funds for a federal campaign.¹⁷ Additionally, the Response
 5 argues that the flyer included in the Complaint does not indicate that LaRose had become a
 6 candidate and that there is no information indicating that LaRose was involved in distributing the
 7 flyer, although neither the Response nor declaration expressly deny his involvement in creating
 8 or distributing it.¹⁸ The Response acknowledges that LaRose solicited funds for Leadership for
 9 Ohio Fund, but states that “it is clear he was raising funds for non-federal activity” to support
 10 election integrity and spread the group’s “message of fair, open, and honest elections.”¹⁹ The
 11 Response attaches a thank-you note sent to a donor, which discusses his “work as Ohio Secretary
 12 of State” and election initiatives.²⁰ Finally, LaRose avers that was not involved with any of
 13 Leadership for Ohio Fund’s activities other than his solicitations on its behalf.²¹

¹⁵ Frank LaRose & LaRose for Senate Resp. at 9 (Oct. 4, 2023) [hereinafter LaRose Resp.]; Frank LaRose, Statement of Candidacy at 1 (July 17, 2023) <https://docquery.fec.gov/pdf/836/202307179583764836/202307179583764836.pdf>.

¹⁶ *FEC Receipts: Filtered Results*, FEC.GOV, https://www.fec.gov/data/receipts/?data_type=processed&committee_id=C00845735&two_year_transaction_period=2024&min_date=01%2F01%2F2023&max_date=12%2F31%2F2024 (last visited Nov. 14, 2024) (reflecting receipts to LaRose for Senate for the 2024 election cycle); *FEC Disbursements: Filtered Results*, FEC.GOV, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00845735&two_year_transaction_period=2024&min_date=01%2F01%2F2023&max_date=12%2F31%2F2024 (last visited Nov. 14, 2024) (reflecting disbursements to LaRose for Senate for the 2024 election cycle).

¹⁷ LaRose Resp., Ex. A ¶¶ 22-23 (Decl. of Frank LaRose) [hereinafter LaRose Decl.]. The declaration is not notarized but contains the statement that LaRose “declare[s] under penalty of perjury that the following is true and correct.” *Id.*

¹⁸ LaRose Resp. at 11.

¹⁹ *Id.* at 5, 7.

²⁰ *Id.* at 8 & Ex. B.

²¹ LaRose Decl. ¶¶ 11, 20, 24.

The Response from Leadership for Ohio Fund denies that it violated the Act, asserting that it “did not engage in activities regulated by the Commission” until it filed a Statement of Organization with Commission.²² It does not address the content of the alleged “push poll” raised in the Complaint. In its initial amended filing with the IRS, Leadership for Ohio Fund reported raising \$1,023,877 and making expenditures totaling \$344,536 from March 2, 2023 to June 30, 2023.²³ The Committee reported a \$122,000 payment to Causeway Solutions, LLC — which is the organization that purportedly ran the poll referenced in the Complaint — for “research services.”²⁴ After filing with the Commission, Leadership for Ohio Fund, to date, has reported independent expenditures in favor of LaRose and opposing a candidate running against LaRose totaling \$5,477,980.70.²⁵

III. LEGAL ANALYSIS

A. The Commission Should Dismiss the Allegations That LaRose Failed to Timely File a Statement of Candidacy and That LaRose for Senate Failed to Timely File a Statement of Organization

An individual becomes a candidate under the Act if he or she receives contributions or makes expenditures in excess of \$5,000 or consents to another doing so on his or her behalf.²⁶ A contribution is any gift, subscription, loan, advance or deposit of money or anything of value

²² Leadership for Ohio Fund Resp. at 1 (Sept. 6, 2023); *see* Leadership for Ohio Fund, Statement of Organization at 1 (July 15, 2023), <https://docquery.fec.gov/pdf/011/202307159583163011/202307159583163011.pdf>.

²³ Leadership for Ohio Fund, Form 8872. Additionally, the initial amended report filed with the IRS discloses contributions greater than the contribution limit to a candidate and from possible prohibited sources. *Id.* at 5.

²⁴ *Id.* at 14.

²⁵ *FEC Independent Expenditures: Filtered Results*, FEC.GOV, https://www.fec.gov/data/independent-expenditures/?q_spender=C00845685&two_year_transaction_period=2024&cycle=2024&is_notice=false&data_type=processed (last visited Nov. 14, 2024) (reflecting 18 independent expenditures by Leadership for Ohio Fund for the 2024 election cycle).

²⁶ 52 U.S.C. § 30101(2) (definition of candidate); *accord* 11 C.F.R. § 100.3(a) (same).

made by any person for the purpose of influencing any election for federal office.²⁷ Once the \$5,000 threshold has been met, the candidate has 15 days to file a Statement of Candidacy with the Commission that designates a principal campaign committee.²⁸ The principal campaign committee must file a Statement of Organization within ten days of its designation,²⁹ and it must file disclosure reports with the Commission.³⁰

The available information does not indicate that LaRose crossed the \$5,000 threshold prior to July 17, 2023, and therefore it does not appear that LaRose or the Committee failed to timely file Statements of Candidacy and Organization. This is also consistent with disclosure reports filed by the Committee, which do not disclose any contributions or disbursements prior to July 17, 2023.³¹

The Complaint alleges that LaRose or his agents disseminated general public advertising stating that LaRose “Can Win” in the general election and that his mission is to “Beat Sherrod Brown.”³² But this Office is aware of no information indicating that LaRose prepared or approved the flyer.³³ The Response by LaRose and the Committee contends that the flyer does not state that LaRose is a federal candidate.³⁴ Moreover, even if LaRose or the Committee paid

²⁷ 52 U.S.C. § 30101(8)(A)(i); 11 C.F.R. § 100.52.

²⁸ 52 U.S.C. § 30102(e)(1); 11 C.F.R. § 101.1(a).

²⁹ 52 U.S.C. § 30103(a); 11 C.F.R. § 102.1(a).

³⁰ 52 U.S.C. § 30104(a), (b).

³¹ *FEC Receipts: Filtered Results*, FEC.GOV, https://www.fec.gov/data/receipts/?data_type=processed&committee_id=C00845735&two_year_transaction_period=2024&min_date=01%2F01%2F2023&max_date=12%2F31%2F2024 (last visited Nov. 14, 2024) (reflecting receipts reported by LaRose for Senate during the 2024 election cycle); *FEC Disbursements: Filtered Results*, FEC.GOV, https://www.fec.gov/data/disbursements/?data_type=processed&committee_id=C00845735&two_year_transaction_period=2024&min_date=01%2F01%2F2023&max_date=12%2F31%2F2024 (last visited Nov. 14, 2024) (reflecting disbursements reported by LaRose for Senate during the 2024 election cycle).

³² Compl. at 7.

³³ LaRose Resp. at 11.

³⁴ *Id.*

1 for the flyer, there is no available information indicating that the one-page flyer cost more than
 2 \$5,000 to produce or distribute. The Complaint provides a copy of the flyer, but it does not
 3 provide information as to how or how broadly it was distributed.³⁵

4 Also, the Complaint claims that LaRose became a federal candidate by soliciting
 5 contributions for Leadership for Ohio Fund.³⁶ However, there does not appear to be
 6 contemporaneous publicly available information indicating that contributions to (or solicitation
 7 on behalf of) Leadership for Ohio Fund were made in connection with LaRose's federal
 8 candidacy. Additionally, LaRose avers that funds raised for Leadership for Ohio Fund were to
 9 promote election integrity initiatives, and we have no information to the contrary.³⁷

10 Accordingly, we recommend that the Commission dismiss the allegation that Frank
 11 LaRose violated 52 U.S.C. § 30102(e)(1) and 11 C.F.R. § 101.1(a) by failing to timely file a
 12 Statement of Candidacy. Additionally, because there is no information indicating that LaRose
 13 filed his Statement of Candidacy late, there is likewise no information indicating that the
 14 Committee filed its Statement of Organization late. Accordingly, we recommend that the
 15 Commission dismiss the allegation that the Committee violated 52 U.S.C. § 30103(a) and
 16 11 C.F.R. § 102.1(a) by failing to timely file a Statement of Organization.

17 **B. The Commission Should Dismiss the Allegation That LaRose Violated the**
 18 **Soft Money Solicitation Prohibition**

19 The Act prohibits federal candidates and officeholders, their agents, and entities directly
 20 or indirectly established, financed, maintained, or controlled by or acting on behalf of one or
 21 more candidates or individuals holding federal office, from “solicit[ing], receiv[ing], direct[ing],

³⁵ Compl. at 2 & Ex. 1; *see* 11 C.F.R. § 100.27.

³⁶ Compl. at 8.

³⁷ LaRose Decl. ¶ 10; *see also* LaRose Resp., Ex. B (attaching thank-you cards to donors detailing he was raising funds for Leadership for Ohio Fund to promote his work as Secretary of State and election initiatives).

transfer[ing], or spend[ing] funds in connection with an election for Federal office, . . . unless the funds are subject to the limitations, prohibitions, and reporting requirements of [the] Act.”³⁸

The Complaint alleges that LaRose raised money for Leadership for Ohio Fund in order to help promote his Senate election.³⁹ As discussed above, the available information does not indicate that LaRose was a federal candidate when he made solicitations on behalf of Leadership for Ohio Fund.⁴⁰ Therefore, we recommend that the Commission dismiss the allegation that Frank LaRose violated 52 U.S.C. § 30125(e)(1)(A) and 11 C.F.R. § 300.61 by soliciting soft money contributions as a federal candidate.

C. The Commission Should Dismiss the Allegation That Leadership for Ohio Fund Failed to Timely Register with the Commission

The Act and Commission regulations define a “political committee” as “any committee club, association, or other group of persons which receives contributions aggregating in excess of \$1,000 during a calendar year or which makes expenditures aggregating in excess of \$1,000 during a calendar year.”⁴¹ In *Buckley v. Valeo*, the Supreme Court held that defining political committee status “only in terms of [the] amount of annual ‘contributions’ and ‘expenditures’” might be overbroad, reaching “groups engaged purely in issue discussion.”⁴² To cure that infirmity, the Court concluded that the term “political committee” “need only encompass organizations that are under the control of a candidate or the *major purpose of which is the nomination or election of a candidate.*”⁴³ Accordingly, under the statute as thus construed, an

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

³⁹ Compl. at 3.

⁴⁰ Cf. Factual & Legal Analysis (“F&LA”) at 11, MUR 6430 (Steven Daines) (finding that the prohibition on the use of “soft money” did not apply to an individual who had not become a federal candidate).

⁴¹ 52 U.S.C. § 30101(4)(A); 11 C.F.R. § 100.5.

⁴² 424 U.S. 1 at 79 (1976) (*per curiam*).

⁴³ *Id.* (emphasis added).

organization that is not controlled by a candidate must register as a political committee only if (1) it crosses the \$1,000 threshold and (2) it has as its “major purpose” the nomination or election of federal candidates.

Political committees must comply with certain organizational and reporting requirements set forth in the Act. They must register with the Commission, file periodic reports, appoint a treasurer who maintains its records, and identify themselves through disclaimers on all their political advertising, on their websites, and in mass emails.⁴⁴

The Complaint alleges that Leadership for Ohio Fund was formed to support a LaRose candidacy.⁴⁵ Leadership for Ohio Fund states that “the Fund did not engage in any activities regulated by the Commission.”⁴⁶ LaRose avers that he understood that Leadership for Ohio Fund would engage in activity regarding election integrity.⁴⁷ A Leadership for Ohio Fund filing with the IRS states that its purpose was “[t]o engage in exempt function activities in Ohio.”⁴⁸

The Complaint argues that “[Leadership for Ohio Fund’s] apparent push poll in favor of LaRose” indicates that it was supporting LaRose’s federal candidacy prior to registering with the Commission.⁴⁹ However, there is no available information establishing that the poll Leadership for Ohio Fund commissioned was a “push poll” or otherwise advocated for the election or defeat

⁴⁴ 52 U.S.C. §§ 30102-30104; 11 C.F.R. § 110.11(a)(1).

⁴⁵ Compl. at 3.

⁴⁶ Leadership for Ohio Fund Resp. at 1.

⁴⁷ LaRose Decl. ¶ 9.

⁴⁸ Leadership for Ohio Fund, Form 8871.

⁴⁹ Compl. at 9-10. The Complaint does not define “push poll;” however, a definition for “push poll” is “a negative campaigning technique, typically conducted by telephone, used to influence voters by asking specific questions about an issue or a candidate. Under the guise of an objective opinion poll, loaded questions are posed to mislead or bias the listener against an opposing candidate or political party.” *Push Polling*, BALLOTPEDIA, https://ballotpedia.org/Push_polling (last visited Nov. 14, 2024).

of a clearly identified federal candidate.⁵⁰ The only basis for the Complaint's allegation that it was a "push poll" appears to be that the results favored LaRose.⁵¹ Additionally, LaRose avers that "[he] was not aware of, or involved in directing, any expenditure decisions made for polling or other activities for Leadership for Ohio Fund."⁵² The Complaint does not specifically identify any additional expenditures made by Leadership for Ohio Fund that supported LaRose's senatorial candidacy prior to it registering with the Commission.

The Complaint also alleges that LaRose raised money for Leadership for Ohio Fund to support LaRose's candidacy, but it does not provide specific information to support that allegation other than the poll described above. By contrast, LaRose avers that he was raising money for Leadership for Ohio Fund for messaging "to help raise public confidence in elections."⁵³ Although Leadership for Ohio Fund raised greater than \$1,000 prior to its registration date with the Commission and did ultimately support LaRose's candidacy after mid-July 2023,⁵⁴ we are in possession of no information that establishes that the committee's major purpose was supporting LaRose's candidacy before it registered with the Commission.

Accordingly, we recommend that the Commission dismiss the allegation that Leadership for Ohio Fund violated 52 U.S.C. §§ 30103, 30104 and 11 C.F.R. §§ 102.1(d) and 104.1 by failing to timely register and file reports with the Commission.

⁵⁰ Neither the Complaint nor the article it cites includes the specific language of the poll.

⁵¹ Gorman, *supra* note 13.

⁵² LaRose Decl. ¶ 20.

⁵³ *Id.* ¶ 9.

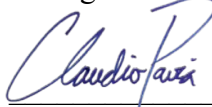
⁵⁴ *FEC Receipts: Filtered Results*, FEC.GOV, https://www.fec.gov/data/receipts/?data_type=processed&committee_id=C00845685&two_year_transaction_period=2024&min_date=01%2F01%2F2023&max_date=07%2F14%2F2023 (last visited Nov. 14, 2024) (reflecting \$665,025.40 in contributions for Leadership for Ohio Fund on July 6, 2024); *see also* Leadership for Ohio Fund, Form 8872 (disclosing raising \$1,023,877 and making expenditures totaling \$344,536 from March 2, 2023 to June 30, 2023).

IV. RECOMMENDATIONS


1. Dismiss the allegation that Frank LaRose violated 52 U.S.C. § 30102(e)(1) and 11 C.F.R. § 101.1(a) by failing to timely file a Statement of Candidacy;
2. Dismiss the allegation that LaRose for Senate and Lisa Lisker in her official capacity as treasurer violated 52 U.S.C. § 30103(a) and 11 C.F.R. § 102.1(a) by failing to timely file a Statement of Organization;
3. Dismiss the allegation that Frank LaRose violated 52 U.S.C. § 30125(e)(1)(A) and 11 C.F.R. § 300.61 by soliciting soft money as a candidate for federal office;
4. Dismiss the allegation that Leadership for Ohio Fund and Dustin McIntyre in his official capacity as treasurer violated 52 U.S.C. §§ 30103, 30104 and 11 C.F.R. §§ 102.1(d) and 104.1 by failing to timely file a Statement of Organization and reports with the Commission;
5. Approve the attached Factual and Legal Analysis;
6. Approve the appropriate letters; and
7. Close the file effective 30 days from the date the certification of this vote is signed (or on the next business day after the 30th day, if the 30th day falls on a weekend or holiday).

Lisa J. Stevenson
Acting General Counsel

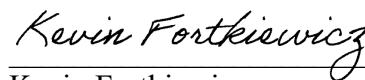
November 15 2024
Date



Claudio J. Pavia
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Kevin Fortkiewicz
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