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July 26, 2024

RECEIVED

By OGC/CELA at 4:29 pm, Jul 29, 2024

Ms. Wanda D. Brown
Assistant General Counsel
Office of Complaints Examination
and Legal Administration
Federal Election Commission
Attn: Kathryn Ross, Paralegal
1050 First Street, N.E.
Washington, D.C. 20463

VIA E-mail to CELA@fec.gov

Re: MUR 8284

Dear Ms. Brown:

The undersigned serves as counsel to Giving Willingly Empowering Nationally (GWEN) PAC (the “Committee” or the “PAC”), Rep. Gwen Moore, and Brenda L. Moore, in her official capacity as Treasurer (collectively, “Respondents”). This letter responds on behalf of Respondents to the Commission’s notification that it received a complaint (the “Complaint”) from Foundation for Accountability and Civic Trust (“FACT” or the “Complainant”) alleging that the Respondents violated the Federal Election Campaign Act (the “Act”) and Federal Election Commission (the “Commission”) regulations.

As a threshold matter, Respondents note that this Complaint is nearly identical to the one at issue in MUR 8164. The only changes here are (1) the Complainants have dropped the “personal use” allegations, which have been relegated to a footnote – likely based on the clear Commission precedent that the Act’s personal use regulations do not apply to leadership PACs, and (2) the Complaint is based on updated facts for the 2023-24 cycle and only applies to those new facts. Otherwise, the “scam PAC” allegation is the same as the one at issue in MUR 8164.

Moving to the merits, FACT’s new Complaint alleges that the Committee has violated a provision that does not exist in the Act or the Commission’s regulations, namely its allegations related to the Committee being a “scam PAC.” As will be described further below (and as described in the Response to MUR 8164), this allegation is without any legal or factual merit, and the Commission should find no reason to believe that a violation of law has occurred and summarily dismiss the Complaint.

Background

The Complaint lays out a series of facts in an effort to support a claim that Rep. Moore's leadership PAC is a "scam PAC" being run to financially benefit the Respondents by perpetrating an alleged fraud. This claim is as untrue as it was the first time around in MUR 8164, and the Respondents once again categorically deny any fraudulent behavior reminiscent of a so-called "scam PAC."

The Complaint asserts that "at least 79% of GWEN PAC's spending has gone towards operating expenditures" and "more than 95% of total expenditures have gone toward things other than contributions to political committees or organizations."¹ Notably, however, these figures are based on "data submitted to the FEC by GWEN PAC of receipt and disbursement between January 1, 2023 and March 31, 2024."² As a result, the Complaint is based on data regarding the period of time before the 2024 election cycle's activity has kicked off in earnest.

The Complaint's reliance on GWEN PAC's 2023 and early 2024 figures do not paint a full picture of GWEN PAC's goals or overall strategy because it only describes activity during the first half of the 2023-24 election cycle. GWEN PAC regularly spends more on operating expenses and less on direct contributions in off-years like 2023 because the PAC's goal is to raise funds for it to make contributions in actual election years, when it would be most useful to recipients. For this reason, the PAC's 2023 and early 2024 disbursements were for activities related to fundraising, including consultants and various expenses related to meetings and events with donors, rather than outgoing contributions.

Not reflected in the reports reviewed by the Complainant are the additional funds GWEN PAC contributed since March 31, 2024, or its anticipated giving for 2024 that will well exceed its activity in previous election cycles. This overall strategy is consistent with GWEN PAC's raising and giving in past cycles as well, as shown in the attached comparison of GWEN PAC's operating expenditures and outgoing contributions in off-years versus election years where the percentage spent on contributions regularly increases in election years.³

The Complaint also misleadingly characterizes the PAC as (1) misreporting contributions to allegedly hide payments to fundraising consultants, and (2) as making excessively large payments to Rep. Gwen Moore's sister, Brenda Moore, who serves as the President and Treasurer of GWEN PAC. Speaking to the "misreporting" first, the PAC's reports for 2023 and 2024 clearly show the correct amount of contributions on Line 23, so this claim that the PAC reported \$31,000 worth of payments to fundraising consultants as "contributions" has no basis in fact.⁴

¹ Compl. at 1.

² Compl. at 1 n.1.

³ See Ex. 1. (comparing total operating expenditures and outgoing contributions in off-years versus election years).

⁴ GWEN PAC, [*Disbursements*](#) (filtered by Line 23).

Second, on the issue of the payments to Brenda Moore, because she serves as the Executive Director and Treasurer of the PAC, she is paid a modest annual compensation of approximately \$5,000 – not some excessive amount as implied by the Complaint. All payments made to Brenda Moore are for compensation for these bona fide services provided to the Committee or reimbursements for legitimate travel expenses incurred on behalf of the Committee. This figure is relatively small as compared to the value of the services she provides to the PAC.

As discussed in the Response in MUR 8164, although the personal use rules do not apply in this instance, these payments to Brenda Moore would clearly meet the requirements that are applicable to payments made by an authorized campaign committee for bona fide services rendered by a family member.⁵ To be sure, these payments fall below the fair market value of those services.⁶ In addition, the Complaint does not allege, but in any event the Respondents emphatically deny, that any spending by GWEN PAC was for the personal use of Congresswoman Moore.

GWEN PAC runs a robust fundraising operation to help advance its electoral mission, and the expenses for this fundraising operation are often higher in off-years like 2023 than election years like 2024.⁷ As stated above, the Complaint attempts to portray the PAC as only spending funds on “operating expenses,” but the period covered by the Complaint does not provide complete context for GWEN PAC’s fundraising and giving strategy over the course of a full election cycle. Like other leadership PACs, GWEN PAC’s off-year spending is geared toward fundraising activity so that it can increase its outgoing contribution activity in election years.

Legal Analysis

1. GWEN PAC is not engaged in any fraudulent activity or operating as a “Scam PAC”.

The Committee is in no way engaged in any fraudulent activity and strongly rejects any allegation that it is a “scam PAC,” though neither the Act nor the Commission’s regulations address the concept of a “scam PAC.”⁸ Neither the Commission nor Congress has ever set forth any standards to assess or require any minimum percentage of contributions that any type of political committee must give to other political committees in proportion to its total spending.

⁵ 11 C.F.R. § 113.1(g)(1)(i)(H).

⁶ *Id.*

⁷ *See* Ex. 1.

⁸ And of course, “[f]ederal candidates and office holders are not permitted to operate a scam PAC” – no law permits anyone to commit fraudulent activity. The Complaint’s distinction that the Committee is not a leadership PAC has no basis in law. Complaint at 2-3, 6.

Such a concept is non-existent in the law, and any such analysis by the Commission is not within its scope or jurisdiction.

The concept of “scam PACs” has arisen within the context of prosecutions by the Department of Justice for consultants who purported to raise funds for “Super PACs” that engaged in no discernable activity other than lining the pockets of the political consultants that established them.⁹

The FBI defines a “scam PAC” as “fraudulent political action committees designed to reroute political contributions for personal financial gain.”¹⁰ Although the Complaint describes elements of GWEN PAC’s activities that it believes to be indicative of “scam PACs,” those indications miss out on two crucial factors highlighted in the FBI’s definition – fraud and personal financial gain. By properly framing the question here, it is clear that the Committee is not a scam PAC because its activities are neither fraudulent nor being used for any illicit personal financial gain.

Rather, as described above, the Committee is engaged in legitimate fundraising and political activity, including making contributions to other candidates,¹¹ and its spending is well within the varied spending ratios of other leadership PACs. Unlike the Complaint in MUR 8164, the Complainants now recognize that no bright-line threshold exists that delineates a “scam PAC” from a properly operating leadership PAC, so instead, it bases its new allegations on reports from the less active period of the 2023-24 election cycle in order to bias the data.¹²

When reviewing the 2023-24 expenditures by leadership PACs for the five most senior House Members of each party and the House Leadership and comparing it to GWEN PAC’s spending, however, it becomes clear that GWEN PAC’s general strategy of spending more on operating expenditures for fundraising purposes in off-years is well within the norm. While leadership PAC spending on contributions and operating expenditures is varied, there is a clear

⁹ Federal Bureau of Investigation, *Election Crimes and Security – Scam PACs*, available at <https://www.fbi.gov/how-we-can-help-you/safety-resources/scams-and-safety/common-scams-and-crimes/election-crimes-and-security> (“If you or someone you know has been targeted by a scam PAC, contact your local FBI field office and ask to speak to an election crimes coordinator”); see also Dept. of Justice, *Three Individuals Sentenced for Soliciting Millions of Dollars in Contributions to Scam PACs* (Apr. 25, 2023), available at <https://www.justice.gov/opa/pr/three-individuals-sentenced-soliciting-millions-dollars-contributions-scam-pacs>; Federal Bureau of Investigation, *Scam PACs are on the Rise* (Apr. 15, 2021), available at <https://www.fbi.gov/news/stories/scam-pacs-are-on-the-rise-041521>.

¹⁰ Compare Federal Bureau of Investigation, *Election Crimes and Security – Scam PACs*, available at <https://www.fbi.gov/how-we-can-help-you/safety-resources/scams-and-safety/common-scams-and-crimes/election-crimes-and-security>, with Complaint at 2.

¹¹ Here, the Respondents agree with the Complaint, which notes that “[f]ederal law sets forth a regulatory scheme under which federal candidates are only allowed to raise and spend funds as specifically identified in the Act,” because that is exactly what the Respondents are doing. See Compl. at 2.

¹² Compare MUR 8164, Compl. at 4 (stating that a 20% spend on contributions is “the same ratio as a scam PAC” and that “GWEN PAC’s spending ratios [are] the same as a scam PAC”) with MUR 8284, Compl. at 2 (“Although there is no precise ratio of spending, . . .”).

trend among these PACs to spend more funds on operating expenditures in off-years than election years and to make more contributions in election years than in off-years.¹³

What this proves is that all leadership PACs are engaged in some amount of outgoing contributions and some amount of operating expenditures to raise funds for their activity to support other candidates. These amounts vary based on a variety of circumstances, including the timing within a particular election cycle, a candidate's location, and other external factors, but generally speaking, many leadership PACs spend a higher percentage of funds on operating expenditures in off-years and on contributions in election years. By basing allegations on only part of the election cycle, the Complaint is missing a key part of this overall trend among leadership PACs, including GWEN PAC.

2. The Complaint Does Not Provide any Facts That Specifically Allege Any Violation of Law.

Notwithstanding the fact that the Complaint misapplies the law to the facts, the Complaint must also be dismissed because it does not actually allege any specific facts that would lead to a violation of the Act because the notion of "scam PACs" is not within the jurisdiction of the Commission. As the Commission has stated:

The Commission may find "reason to believe" only if a complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the FECA. Complaints not based upon personal knowledge must identify a source of information that reasonably gives rise to a belief in the truth of the allegations presented [citations omitted].

Unwarranted legal conclusions from asserted facts, *see* SOR in MUR 4869 (American Postal Workers Union), or mere speculation, *see* SOR of Chairman Wold and Commissioners Mason and Thomas in MUR 4850 (Fossella), will not be accepted as true. In addition, while credibility will not be weighed in favor of the complainant or the respondent, a complaint may be dismissed if it consists of factual allegations that are refuted with sufficiently compelling evidence provided in the response to the complaint, *see* MUR 4852 (Wiebe), or available from public sources such as the Commission's reports database.¹⁴

As with MUR 8164, the Complaint in this matter provides no specific facts as to how expenditures provided any personal benefit to Congresswoman Moore, why payments to Brenda Moore were not for bona fide campaign services, or how spending more on operating expenditures in an off-year than in an election year is indicative of fraud. Rather, it merely

¹³ See Ex. 2 (comparing operating expenditures versus outgoing contributions of major leadership PACs in 2023 and 2024, the same period relevant to the Complaint's allegations).

¹⁴ MUR 4960, *Statement of Reasons of Commissioners David M. Mason, Karl J. Sandstrom, Bradley A. Smith, and Scott E. Thomas* at 1-2 (December 21, 2000), available at <https://www.fec.gov/files/legal/murs/4960/0000263B.pdf>.

speculates that the payments made for travel, food, catering, lodging, etc. were made for the personal benefit of the candidate.

Instead, the fact that a duplicate Complaint was filed with similar facts and the same “scam PAC” argument reveals that this new Complaint’s actual purpose is to harass and embarrass Congresswoman Moore. That intent is made clear by the Complaint’s declaration that GWEN PAC’s spending ratio is “so extreme that anyone donating to GWEN PAC is either (1) being completely bamboozled by Rep. Moore or (2) doing so knowingly in an attempt to influence the Member,” a claim that is nothing more than conjecture at best and an attempt to defame the Congresswoman at worst.¹⁵ No facts exist to prove such an assertion, and this type of conclusory criticism and conjecture does not meet the standards set forth by the Commission.¹⁶

Conclusion

The Respondents are not engaged in fraudulent activity in any way, shape, or form. All of the Committee’s spending is related to its purpose of helping elect pro-choice Democratic women and men to the House and Senate, namely through its outgoing contributions and its other expenses to raise funds for those contributions. Despite the Complainant’s belief in some threshold or spending ratio that indicates a “scam PAC,” no such threshold exists in law nor in practice, as shown by the spending of other leadership PACs. What’s more, GWEN PAC’s spending in 2023 and 2024 fits squarely within its own spending habits in past election cycles and within the trends generally applicable to all leadership PACs. With this in mind, GWEN PAC is clearly not anything resembling a “scam PAC” and is instead engaged in normal spending behavior for similarly situated leadership PACs.

¹⁵ See Compl. at 6.

¹⁶ *Id.*

The Commission should find that no reason to believe exists here and should summarily dismiss this Complaint. If you have any questions regarding this Response, my daytime number is (202) 479-1111. My email address is reiff@sandlerreiff.com.

Sincerely,

A handwritten signature in blue ink, appearing to read 'N. Reiff'.

Neil P. Reiff
Aaron Barden
Counsel to GWEN PAC, Rep. Gwen Moore,
and Brenda L. Moore



FEDERAL ELECTION COMMISSION
1050 First Street, NE
Washington, DC

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

E-MAIL: cela@fec.gov

AR/MUR/RR/P-MUR# MUR 8284

Name of Counsel: Neil Reff

Firm: Sandler Reiff Lamb Rosenstein & Birkenstock, PC

Address: 1099 Vermont Ave, NW, Ste. 250

Washington, DC 20005


Office#: 202-479-1111 Fax#: _____

Mobile#: _____

E-mail: reiff@sandlerreiff.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

7/22/204
Date


(Signature - Respondent/Agent/Treasurer)

Member of Congress
Title

Gwen S. Moore
(Name - Please Print)

RESPONDENT: Gwen S. Moore
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: PO BOX 16646, MILWAUKEE, WI 53216
(Please Print)

Home#: _____ Mobile#: _____

Office#: 202-548-0880 Fax#: _____

E-mail: CHRIS@CHRISTRULLFUNDRAISING.COM 

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.

Rev. 2023



FEDERAL ELECTION COMMISSION
1050 First Street, NE
Washington, DC

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

E-MAIL: cela@fec.gov

AR/MUR/RR/P-MUR# MUR 8284

Name of Counsel: Neil Reiff

Firm: Sandler Reiff Lamb Rosenstein & Birkenstock, PC

Address: 1099 Vermont Ave, NW, Ste. 250

Washington, DC 20005

Office#: 202-479-1111 **Fax#:** _____

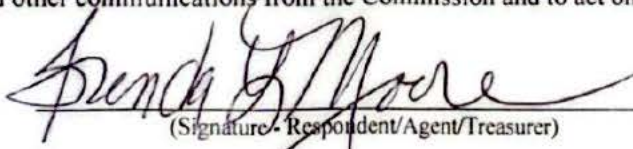
Mobile#: _____

E-mail: reiff@sandlerreiff.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

7/22/24

Date



(Signature - Respondent/Agent/Treasurer)

President, GWEN PAC

Title

Brenda L. Moore

(Name - Please Print)

RESPONDENT: Brenda L. Moore
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 110 D STREET, SE, [REDACTED] WASHINGTON, DC 20003
(Please Print)

Home#: _____ **Mobile#:** _____

Office#: 202-548-0880 **Fax#:** _____

E-mail: CHRIS@CHRISTRULLFUNDRAISING.COM; [REDACTED]

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Washington, DC

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Provide one form for each Respondent/Witness

E-MAIL: cela@fec.gov

AR/MUR/RR/P-MUR# MUR 8284

Name of Counsel: Neil Reff

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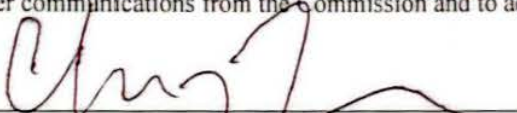
Mobile#: _____

E-mail: reiff@sandlerreiff.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

7/22/204

Date


(Signature Respondent/Agent/Treasurer)

Principal, GWEN PAC

Title

Chris Trull

(Name - Please Print)

RESPONDENT: GWEN PAC

(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: PO BOX 33079, WASHINGTON, DC 20033
(Please Print)

Home#: _____ Mobile#: _____

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Rev. 2023

<u>Election Cycle</u>	<u>Year</u>	<u>Total expenditures</u>	<u>Total operating expenditures</u>	<u>% of total</u>	<u>Total contributions</u>	<u>% of total</u>
2011-12	2011	\$38,567.78	\$28,317.78	73.42%	\$10,250.00	26.58%
	2012	\$78,268.97	\$45,768.97	58.48%	\$32,000.00	40.88%
2013-14	2013	\$60,132.40	\$46,632.40	77.55%	\$14,000.00	23.28%
	2014	\$81,009.40	\$62,009.40	76.55%	\$19,000.00	23.45%
2015-16	2015	\$88,546.23	\$69,546.23	78.54%	\$19,000.00	21.46%
	2016	\$130,605.62	\$88,405.62	67.69%	\$42,200.00	32.31%
2017-18	2017	\$108,599.30	\$97,099.30	89.41%	\$11,500.00	10.59%
	2018	\$149,610.49	\$108,710.49	72.66%	\$40,500.00	27.07%
2019-20	2019	\$162,012.46	\$157,589.87	97.27%	\$4,422.59	2.73%
	2020	\$150,739.12	\$112,839.12	74.86%	\$35,900.00	23.82%
2021-22	2021	\$175,061.19	\$128,061.91	73.15%	\$49,000.00	27.99%
	2022	\$226,124.54	\$190,529.48	84.26%	\$35,595.06	15.74%
2023-2024	2023	\$216,393.88	\$201,271.45	93.01%	\$15,122.43	6.99%
	2024 (1/1 - 6/30)	\$128,717.62	\$115,717.62	89.90%	\$13,000.00	10.10%

<u>Representative</u>	<u>Leadership PAC name</u>	<u>Year</u>	<u>Total expenditures</u>	<u>Total operating expenditures</u>	<u>% of total</u>	<u>Total contributions</u>	<u>% of total</u>
Rep. Gwen Moore, WI-4 (D)	Giving Willingly Empowering Nationally (GWEN) PAC	2023	\$216,393.88	\$201,271.45	93.01%	\$15,122.43	6.99%
		2024 (1/1 - 6/30)	\$128,717.62	\$115,717.62	89.90%	\$13,000.00	10.10%
Rep. Harold Rogers, KY-5 (R)	Help America's Leaders PAC (HALPAC)	2023	\$224,079.11	\$225,579.11	100.67%	\$0.00	0.00%
		2024 (1/1 - 6/30)	\$116,482.45	\$100,982.45	86.69%	\$8,000.00	6.87%
Rep. Chris Smith, NJ-4 (R)	Citizens Strengthening Our Message in the House	2023	\$5,523.98	\$2,223.98	40.26%	\$3,300.00	59.74%
		2024 (1/1 - 6/30)	\$4,588.50	\$1,288.50	28.08%	\$3,300.00	71.92%
Rep. Steny Hoyer, MD-5 (D)	AmeriPAC: The Fund for a Greater America	2023	\$2,641,216.91	\$1,868,993.61	70.76%	\$550,000.00	20.82%
		2024 (1/1 - 6/30)	\$1,700,608.92	\$1,204,934.80	70.85%	\$345,000.00	20.29%
Rep. Marcy Kaptur, OH-9 (D)	TrueDem Leadership Fund	2023	\$37,252.50	\$7,752.50	20.81%	\$29,500.00	79.19%
		2024 (1/1 - 6/30)	\$12,549.12	\$2,549.12	20.31%	\$10,000.00	79.69%
Rep. Nancy Pelosi, CA-11 (D)	PAC to the Future	2023	\$4,262,970.91	\$1,647,820.13	38.65%	\$1,057,833.33	24.81%
		2024 (1/1 - 6/30)	\$1,813,680.40	\$853,923.00	47.08%	\$812,377.45	44.79%
Rep. Frank Pallone, NJ-6 (D)	Shore PAC	2023	\$348,105.48	\$119,605.48	34.36%	\$228,500.00	65.64%
		2024 (1/1 - 6/30)	\$239,103.97	\$53,103.97	22.21%	\$181,000.00	75.70%
Rep. Richard Neal, MA-1 (D)	The Madison PAC	2023	\$351,342.10	\$349,342.10	99.43%	\$2,000.00	0.57%
		2024 (1/1 - 6/30)	\$150,812.70	\$131,812.70	87.40%	\$19,000.00	12.60%
Rep. Ken Calvert, CA-41 (R)	Eureka PAC	2023	\$248,631.60	\$48,556.60	19.53%	\$154,000.00	61.94%
		2024 (1/1 - 6/30)	\$221,036.01	\$42,136.01	19.06%	\$151,500.00	68.54%

Rep. Frank Lucas, OK-3 (R)	Funding Developing Leadership PAC	2023	\$34,477.40	\$16,477.40	47.79%	\$18,000.00	52.21%
		2024 (1/1 - 6/30)	\$81,676.72	\$8,576.72	10.50%	\$70,600.00	86.44%
Rep. Robert Aderholt, AL-4 (R)	Reaching for a Brighter America PAC	2023	\$62,520.09	\$63,020.09	100.80%	\$3,000.00	4.80%
		2024 (1/1 - 6/30)	\$62,873.02	\$27,873.02	44.33%	\$30,000.00	47.72%
Rep. Patrick McHenry, NC-10 (R)	Innovation PAC	2023	\$660,820.48	\$208,320.48	31.52%	\$452,500.00	68.48%
		2024 (1/1 - 6/30)	\$360,649.58	\$153,149.58	42.46%	\$207,500.00	57.54%
Rep. Steve Scalise, LA-1 (R)	The Eye of the Tiger PAC	2023	\$1,109,114.13	\$184,114.13	16.60%	\$910,000.00	82.05%
		2024 (1/1 - 6/30)	\$465,996.74	\$83,996.74	18.03%	\$382,000.00	81.97%
Rep. Tom Emmer, MN-6 (R)	Electing Majority Making Effective Republicans (EMMER) PAC	2023	\$523,703.69	\$179,203.69	34.22%	\$344,500.00	65.78%
		2024 (1/1 - 6/30)	\$608,292.85	\$40,792.85	6.71%	\$567,500.00	93.29%
Rep. Elise Stefanik, NY-21 (R)	E-PAC	2023	\$705,409.57	\$230,659.57	32.70%	\$474,750.00	67.30%
		2024 (1/1 - 6/30)	\$625,084.30	\$127,084.30	20.33%	\$498,000.00	79.67%
Rep. Gary Palmer, AL-6 (R)	Conservative Promises PAC	2023	\$32,808.13	\$9,308.13	28.37%	\$23,500.00	71.63%
		2024 (1/1 - 6/30)	\$26,187.41	\$4,687.41	17.90%	\$21,500.00	82.10%
Rep. Hakeem Jeffries, NY-8 (D)	Jobs, Education, & Families First (JEFF) PAC	2023	\$908,379.49	\$123,379.49	13.58%	\$780,000.00	85.87%
		2024 (1/1 - 6/30)	\$1,032,144.81	\$165,144.81	16.00%	\$612,000.00	59.29%
Rep. Katherine Clark, MA-5 (D)	Fair Shot PAC	2023	\$1,333,933.88	\$406,879.18	30.50%	\$907,495.00	68.03%
		2024 (1/1 - 6/30)	\$663,587.65	\$231,200.74	34.84%	\$430,916.25	64.94%
	Progressive Majority PAC	2023	\$262,577.85	\$206,037.85	78.47%	\$17,500.00	6.66%

Rep. Pete Aguilar, CA-33 (D)	Progressive Majority PAC	2024 (1/1 - 6/30)	\$135,130.46	\$75,632.46	55.97%	\$39,000.00	28.86%
	CA-LUV PAC (California Leadership United for Victory PAC)	2023	\$802,807.84	\$443,650.23	55.26%	\$349,701.61	43.56%
		2024 (1/1 - 6/30)	\$401,498.88	\$187,498.88	46.70%	\$213,000.00	53.05%
Rep. Ted Lieu, CA-36 (D)	Blue Momentum PAC	2023	\$34,097.54	\$26,507.52	77.74%	\$2,500.00	7.33%
		2024 (1/1 - 6/30)	\$44,189.77	\$7,530.14	17.04%	\$36,659.63	82.96%
	Progressive PAC	2023	\$25,535.90	\$13,535.90	53.01%	\$12,000.00	46.99%
		2024 (1/1 - 6/30)	\$8,415.50	\$4,415.50	52.47%	\$4,000.00	47.53%