



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

BEFORE THE FEDERAL ELECTION COMMISSION

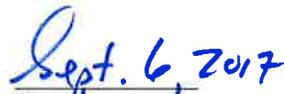
In the Matter of)
)
Comite Pierluisi, Inc.) MUR 7270 (RR 17L-05)

**STATEMENT OF REASONS OF
COMMISSIONER LEE E. GOODMAN**

In MUR 6956 (Espaillat for Congress) and LRA # 980 (Cantor for Congress) I explained my view that a candidate who exercises the right to raise and spend general election contributions on *bona fide* general election expenses (*e.g.*, fundraising and accounting expenses) incurred prior to the date of the primary election is not required to refund such general election funds to general election contributors in the event the candidate loses the primary election.¹ In this matter the Commission’s Office of General Counsel’s report did not address whether or not the general election disbursements made by Comite Pierluisi, Inc. (the “Committee”) were for *bona fide* general election expenses. There was no analysis of the purposes of general election disbursements. As a result, I could not support opening a matter under review and finding reason to believe absent information indicating the Committee’s general election disbursements were improper.²



Lee E. Goodman
Commissioner



Date

¹ See Statement of Reasons of Commissioner Lee E. Goodman, MUR 6956 (Espaillat for Congress); Statement of Commissioner Lee E. Goodman on LRA 980 Request for Consideration of a Legal Question Submitted by Cantor for Congress, April 20, 2015 (publicly available at https://transition.fec.gov/law/lra_documents/LRA_980_Cantor_statement_Goodman.pdf).

² Separately, I agreed that there was reason to believe the Committee violated the Act by accepting excessive primary contributions, which required refunds.