

NJGOP

NEW JERSEY REPUBLICAN PARTY

October 5, 2026

Christine Giordano Hanlon
CHAIR

VIA EMAIL

Pavel Sokolov
VICE CHAIR

Lisa J. Stevenson
Acting General Counsel
Office of General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

Michelle Jones Purdy
SECRETARY

Shaun Van Doren
TREASURER

Luke Ferrante
EXECUTIVE DIRECTOR

Re: Bennett House Victory Fund impermissible use of Joint Fundraising Committee with a principal campaign committee and independent expenditure-only political committee in violation of Advisory Opinion 2024-07.

NATIONAL LEADERSHIP
Republican National Committee

Dear Ms. Stevenson:

Joe Gruters
RNC CHAIRMAN

K.C. Crosbie
RNC Co-CHAIR

Bill Palatucci
RNC COMMITTEEMAN

Janice Fields
RNC COMMITTEEWOMAN

Pursuant to 52 U.S.C. § 30109(a)(1) and 11 C.F.R. § 111.4 the New Jersey Republican State Committee, Inc. ("NJGOP") files this complaint against Rebecca Bennett ("Ms. Bennett"), a candidate for the U.S. House of Representatives in New Jersey District 7, for exceeding the scope of permissible use of a Joint Fundraising Committee ("JFC") with an independent expenditure-only political committee ("Super PAC") in violation of Advisory Opinion 2024-07.

I. FACTS

On August 21, 2026, the Bennett House Victory Fund (the "Bennett JFC") filed a Statement of Organization with the Federal Election Commission ("the Commission") to form a JFC comprised of Rebecca Bennett for Congress (the "Bennett Campaign") and House Majority PAC ("HMP").¹ The Bennett Campaign is the principal campaign committee for Rebecca Bennett, a candidate running for the

¹ *Bennett House Victory Fund, Statement of Organization, FEC Form 1 (Aug. 15, 2026), FEC Filing No. FEC-2009374*

New Jersey District 7 seat in the U.S. House of Representatives.¹ HMP is a Super PAC that supports Democrat candidates for the U.S. House of Representatives through independent expenditures.² The contributions received by the Bennett JFC are being used to fund broadcast advertisements in support of Ms. Bennett's candidacy.³ The Bennett JFC has booked over one million dollars of advertising to run in New York from September 29, 2026 through October 12, 2026.⁴ The Bennett JFC was created so recently that it has not yet filed an FEC report – but the Bennett Campaign and HMP have reported approximately \$1.44 million⁵ and \$135.2 million,⁶ respectively, in cash-on-hand in their most recent filings.

The inclusion of HMP in a JFC alongside the Bennett Campaign – and including Super PACs in JFCs with principal campaign committees generally – is legal, though relatively new. First addressed in the Commission's August 2024 Advisory Opinion 2024-07 (Team Graham) ("Team Graham Advisory Opinion"), the Commission outlined the parameters in which a Super PAC may lawfully participate in a JFC with a principal candidate committee.⁷ The Commission determined this structure was permissible in the context of joint fundraising activities, so long as the JFC only solicited contributions compliant with the Federal Election Campaign Act of 1971 ("FECA") and limited "public communications" resulting from the JFC partnership.⁸ The Commission underscored the strict limitations governing a Super PAC and principal campaign committee's joint participation in a JFC, emphasizing that "public communications" would be permissible only to the extent that payment for these communications followed the JFC's proper allocation of expenses in proportion to limits.⁹ Otherwise, these public communications would turn into "coordinated contributions" and constitute in-kind contributions to the other participating committees.

In the Team Graham Advisory Opinion, the Commission only permitted Team Graham to engage in the "distribution of public communications in the form of solicitations, invitations, and similar fundraising event announcements."¹⁰ The commission relied on the fact that Team

¹ *Rebecca Bennett for Congress, Filings*, Fed. Election Comm'n, FEC Committee Filings page (last visited Oct. 2, 2026).

² *HMP, Committee Overview*, Fed. Election Comm'n, FEC committee page (last visited Oct. 2, 2026).

³ <https://platform.adimpact.com/viewer/5695f8e1-c268-4765-8888-240f181b6de4>.

⁴ Exhibit A.

⁵ *Rebecca Bennett for Congress, FEC Form 3: Report of Receipts and Disbursements, July Quarterly Report, FEC Filing No. 1995184* (July 15, 2026).

⁶ *HMP, FEC Form 3X: Report of Receipts and Disbursements, September Monthly Report, FEC Filing No. 2014596* (Sept. 20, 2026).

⁷ *Team Graham, Inc.*, FEC Advisory Op. 2024-07, at 1, 5 (2024).

⁸ *Id.* at 5–6.

⁹ *Id.* at 5–8. A communication must meet three requirements to be considered a "coordinated communication" under 11 C.F.R. §109.21: content, conduct, and payment. *See* 11 C.F.R. §§109.21(a)(1)-(3). The FEC reasoned that because, "Team Graham will pay the full cost of the public communications attributable to Team Graham, the communications will not meet the payment part of the coordinated communication test and, therefore, will not be in-kind contributions to Senator or Team Graham." *See supra* n. 5 at 7.

¹⁰ *Id.* at 9.

Graham had no intent to distribute any other type of public communication other than those related to event activities, which allowed the permissive use of this JFC to stay within the guardrails of other applicable law.¹¹ The Commission reasoned that because Team Graham made assurances that the JFC would be event-focused (with rather limited public communications), comply with federal limits, and that any joint fundraising costs would be allocated and paid proportionally as required by 11 C.F.R. § 102.17(c)(7), the Super PAC could participate in a JFC alongside the principal campaign committee.¹²

I. LEGAL ANALYSIS

The Bennett JFC is engaging in activities that fall outside the permitted scope of the Team Graham Advisory Opinion. Not limiting themselves to mere fundraising invitations, Ms. Bennett and HMP **are utilizing JFC funds for public communications** by reserving over one million dollars of broadcast advertising.¹³ Indeed, the Bennett JFC's most recent ad buy indicates that the committee purchased airtime worth \$1,055,300 in the weeks immediately preceding the election to run ads in opposition of Congressman Tom Kean, Jr. (NJ-07). If the cost of running these advertisements is being paid for by the JFC and its participants' "proportionate" share of expenses, the Bennett Campaign would be spending nearly half the funds in its coffers on one single ad buy – not to mention production costs and other fees associated with creating and running an advertisement. Given that HMP's war chest is nearly 100 times as large as Ms. Bennett's, moreover, this calls into question whether the Bennett JFC's participants are truly splitting costs "proportionately."

While the Team Graham Advisory Opinion permits JFCs with principal campaign committees and Super PACs to communicate regarding schedules for event logistics and the distribution of public communications in the form of solicitations, invitations and other announcements for fundraising events, the Team Graham Advisory Opinion makes clear this permission is contingent on each committee paying its **proportionate share** of that public communication's cost. If a committee is *not* paying its proportionate share, that public communication distributed by the JFC becomes a prohibited "coordinated communication." To the extent costs associated with the Bennett JFC's broadcast advertisements are *not* allocated proportionately between HMP and the Bennett Campaign – and HMP is funding any part of the Bennett Campaign's portion – the Team Graham Advisory Opinion provides no legal cover for the Bennett JFC's broadcast advertisements.¹⁴

¹¹ *Id.* at 8–9.

¹² *Id.* at 6–7.

¹³ Exhibit A.

¹⁴ Furthermore, any advertisement for which HMP pays more than its proportionate share would convert that advertisement into a "coordinated communication" between the campaign and Super PAC. The Team Graham Advisory Opinion was explicit that its holding only extended to public communications, not coordinated communications. Not only would this activity be a violation of the Team Graham Advisory Opinion, but the result

The Bennett JFC is clearly exceeding the scope of the Team Graham Advisory Opinion and the intent of the Commission by funding broadcast advertisements in support of Ms. Bennett's candidacy. Broadcast advertising extends well beyond the event-related fundraising activities the Commission blessed in the Team Graham Advisory Opinion. It constitutes public communication at the highest level, the creation and production of widely broadcasted television advertisements. Since the Bennett JFC's conduct far exceeds the specific event fundraising activities proposed and subsequently permitted by the Commission, use of a JFC with a Super PAC could result in further violations such as impermissible coordination, improper allocation of expenses, or other violations of applicable contribution limits and contribution source prohibitions.¹⁵

II. CONCLUSION

For the reasons set forth above, we request that the FEC find reason to believe Ms. Bennett has violated Advisory Opinion 2024-07 (Team Graham) through its broadcast advertising activities which exceed the scope of permissible use of a Joint Fundraising Committee. Ms. Bennett, through her JFC, Bennett House Victory Fund should not be permitted to continue to use Bennett House Victory Fund in violation of the Commission's guardrails on JFC use. The FEC should therefore investigate the full extent of Rebecca Bennett's violations of the Act.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me is willfully false, I am subject to punishment.

Sincerely



Luke Ferrante,
Executive Director
New Jersey Republican State Committee, Inc.
P.O. Box 95
Colts Neck, NJ 07722

would be an illegal in-kind contribution from HMP to the Bennett Campaign. Both committees would therefore be exposed to legal liability—Super PACs like HMP cannot contribute to principal campaign committees, and principal campaign committees like the Bennett Campaign cannot accept corporate contributions from a Super PAC. 11 C.F.R. §§114.2(b), (d).

¹⁵ 11 C.F.R. § 114.2(b).

State of New Jersey)
)
County of Morris,)

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On 10-09, 2026 before me, Neeta Patel, Notary Public in and for said county, personally appeared Luke Ferrante, (signer/witness) who has/have satisfactorily identified him/her/themselves as the signer(s) or witness(es) to the above referenced document.

Neeta Patel
Notary Public Signature

My Commission Expires: 10-14-2026

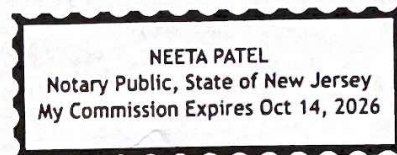


EXHIBIT A



Bennett House Victory Fund (Greer, Margolis, Mitchell, Burns (GMMB)) placed a new broadcast flight from 9/29-10/12 in the contest for NJ CD-07. So far we've seen \$1,055,300 placed.

This is their first broadcast expenditure of the election.

Markets	Current Flight Spend	% of Stations Reported
New York	\$1,055,300	90%

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