

FEDERAL ELECTION COMMISSION

In the matter of:

MUR ____

National Interest Action Inc.

Lisa Lisker, Treasurer, National Interest Action Inc.

in her official capacity as treasurer and in her personal capacity

COMPLAINT

1. Citizens for Responsibility and Ethics in Washington (“CREW”) brings this complaint before the Federal Election Commission (“FEC” or “Commission”) seeking an immediate investigation and enforcement action against National Interest Action Inc. and Lisa Lisker for direct and serious violations of the Federal Election Campaign Act (“FECA”).

2. National Interest Action Inc. is ostensibly a tax-exempt social welfare organization established in Delaware in 2024. There is reason to believe, however, that National Interest Action Inc. is actually a political committee in disguise. Despite representing itself as a social welfare organization, which allows it to spend money influencing elections while leaving the public in the dark about the sources of its funding, National Interest Action Inc. appears to have formed with an immediate objective to engage in federal political activity and should have registered with the FEC as a political committee in 2024 when it dedicated at least 73.56% of its spending that year, its first year in existence, to independent expenditures.

3. Despite its heavy political spending, National Interest Action Inc. never registered as a political committee with the FEC and failed to file reports disclosing its contributors and expenditures. In doing so, National Interest Action Inc. violated the FECA. The FEC should investigate these allegations and take appropriate action to enforce the FECA.

Complainant

4. Complainant CREW is a nonpartisan non-profit corporation, organized under

section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the right of citizens to be informed about the activities of government officials and to ensuring the integrity of government officials. CREW is dedicated to empowering voters to have an influential voice in government decisions and in the governmental decision-making process. CREW uses a combination of research, litigation, and advocacy to advance its mission.

5. In furtherance of its mission, CREW seeks to expose unethical and illegal conduct of those involved in government. Toward this end, CREW monitors the campaign finance activities of those who run for federal office and their supporters and publicizes those who violate federal campaign finance laws through its website, press releases, and other methods of distribution. CREW also files complaints with the FEC when it discovers violations of the FECA. Publicizing campaign finance violators and filing complaints with the FEC serve CREW's mission of keeping the public informed about individuals and entities that violate campaign finance laws and deterring future violations of campaign finance law.

6. In order to assess whether an individual, candidate, political committee, or other regulated entity is complying with federal campaign finance law, CREW needs the information contained in receipts and disbursements reports political committees and others must file pursuant to the FECA, 52 U.S.C. § 30104; 11 C.F.R. §§ 104.1–22, 109.10. CREW is hindered in its programmatic activity when an individual, candidate, political committee, or other regulated entity fails to disclose campaign finance information in reports of receipts and disbursements required by the FECA.

7. CREW relies on the FEC's proper administration of the FECA's reporting requirements because the FECA-mandated disclosure reports are the only source of information CREW can use to determine if an individual, candidate, political committee, or other regulated

entity is complying with the FECA. The proper administration of the FECA’s reporting requirements includes mandating that all disclosure reports required by the FECA are properly and timely filed with the FEC. CREW is hindered in its programmatic activity when the FEC fails to properly administer the FECA’s reporting requirements.

Respondents

8. National Interest Action Inc. is a tax-exempt organization incorporated in Delaware on May 16, 2024, organized under section 501(c)(4) of the Internal Revenue Code. *National Interest Action Inc. Entity Details*, Delaware Division of Corporations (last visited Mar. 11, 2026), <https://tinyurl.com/36npa3f5> (“Certificate of Incorporation”); *National Interest Action Inc. 2024 Form 990*, ProPublica (Nov. 11, 2025), <https://tinyurl.com/4762cxyn>.

9. As of the filing of this complaint, National Interest Action Inc. was not a registered political committee.

10. Lisa Lisker is the treasurer and principal officer of National Interest Action Inc. *2024 Form 990*. Lisker served as the Custodian of Records and Treasurer of JD Vance for Senate Inc., *J.D. Vance for Senate Inc. Statement of Organization*, FEC (Jul. 1, 2021) <https://tinyurl.com/va423wzy>, and is the Owner and President of FEC compliance firm Huckaby Davis Lisker, Inc. *Our Team*, Huckaby Davis Lisker (last visited Mar. 13, 2026), <https://tinyurl.com/5bujar8x>. According to the firm’s website, Lisker is a “nationally recognized campaign finance expert” and has consulted for over 15 presidential committees. *Id.* Colin Stamper, Data Manager and Senior Compliance Analyst at Huckaby Davis Lisker, Inc., signed every independent expenditure report filed by National Interest Action Inc. *Id.*; *Committee filings*, FEC (last visited Mar. 11, 2026) <https://tinyurl.com/bdd55uy5>.

Factual allegations

11. On May 16, 2024, National Interest Action Inc. was incorporated in Delaware as a 501(c)(4) corporation. *Certificate of Incorporation*.

12. Scott Reed, an experienced and well-known political operative in Washington, D.C., is the secretary of National Interest Action Inc. *2024 Form 990*. The former campaign manager for Bob Dole’s 1996 presidential bid, Reed served as a senior political strategist for the U.S. Chamber of Commerce before it fired him for “breach[ing] confidentiality, distort[ing] facts for his own benefit, with[olding] information from chamber leadership and leak[ing] internal information to the press.” Tom Hamburger, *U.S. Chamber of Commerce abruptly ousts top political consultant Scott Reed, alleging leaks*, Wash. Post (Sept. 29, 2020), <https://tinyurl.com/4srupw3s>. As the founder and chairman of the consulting firm Chesapeake Enterprises, he has also been a registered lobbyist since at least 1998. *Lobbyist Activity: Scott W Reed*, Open Secrets, <https://tinyurl.com/98yk2jky>.

13. Reed has a documented history of involvement with political groups that seek to evade the FECA’s political committee reporting obligations. *See FEC Report of Investigation, Interview of Scott W. Reed* (July 7, 2015), <https://tinyurl.com/msvxfrfj> (Reed, founder of Commission on Hope, Growth, and Opportunity (“CHGO”), tells FEC he could not recall “having anything to do with its formation in 2010”); Third General Counsel’s Report, *In re: CHGO*, MUR 6391 & 6471 (FEC, Sept. 24, 2015), <https://tinyurl.com/6xsarmp2> (referring to Reed as “the reported founder” of CHGO and recommending that the FEC find reason to believe that CHGO violated 52 U.S.C. §§ 30102, 30103, 30104, 30120(a)(3), and 30120(d)(2)); *Citizens for Resp. & Ethics in Wash. v. FEC*, 236 F. Supp. 3d 378 (D.D.C. 2017), *aff’d*, 892 F.3d 434

(D.C. Cir. 2018) (finding that the FEC “had strong grounds to prosecute [CHGO] under [FECA]”).

14. Fifty-five days after its incorporation, on July 10, 2024, National Interest Action Inc. began paying for independent expenditures in federal races. *National Interest Action Inc. Independent Expenditures*, FEC (last visited Mar. 11, 2026) <https://tinyurl.com/2mjp3247>. National Interest Action Inc. reported that it spent \$3,529,920.23 on independent expenditures by the end of 2024. *National Interest Action Inc. Financial Summary*, FEC (last visited Mar. 11, 2026) <https://tinyurl.com/5n8jyk3p>.

15. National Interest Action Inc. reported on their 2024 Form 990 that they raised \$11,525,000 and spent \$4,798,654 overall. *2024 Form 990*. They disclosed that one of their “largest program services” was spending \$3,529,920 on “[i]ndependent expenditures made to support candidates who advocate for the national security interests of the USA.” *Id.* They also filed a Schedule C acknowledging that they spent \$3,529,920 on political activity. *National Interest Action Inc. 2024 Form Schedule C*, ProPublica (last visited Mar. 11, 2026) <https://tinyurl.com/4762cxyn>.

16. The \$3,529,920 spent on federal independent expenditures accounted for 73.56% of National Interest Action Inc.’s total spending in 2024, the organization’s first year of existence. National Interest Action Inc.’s only other reported “program service expenses” on its tax filings were a \$100,000 contribution to another “C4” to “advocate for national security interests of the USA,” and \$165,100 for “[r]esearch to further promote exempt program services,” *2024 Form 990 Part III*. It is unknown at this time if any portion of these expenses either directly sought to influence federal elections or supported the organization’s own independent expenditures. To the extent they did, they, and other overhead expenses of National

Interest Action Inc., must also be allocated to the organization's total political spending on federal elections.

17. National Interest Action Inc. has not reported any independent expenditure spending in 2025 to the FEC. National Interest Action Inc. has also not yet filed its tax return for 2025, which is not due until May 15, 2026 and can be filed as late as November 15, 2026 if National Interest Action Inc. seeks an extension. *Return Due Dates for Exempt Organizations: Annual Return*, Internal Revenue Service (last visited Mar. 19, 2026) <https://tinyurl.com/5hx8uabt>. As a result, neither National Interest Action Inc.'s total spending in 2025, nor the percentage of that spending on political activity, is known.

Count I

18. National Interest Action Inc. was a political committee in 2024, but failed to register as one with the FEC.

19. The FECA and FEC 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." 52 U.S.C. § 30101(4)(A); 11 C.F.R. § 100.5(a). An "expenditure" includes "any. . . payment. . . deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office." 52 U.S.C. § 30101(9)(A)(i); 11 C.F.R. § 100.111(a). A "contribution" includes "any gift . . . or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office." 52 U.S.C. § 30101(8)(A)(i); 11 C.F.R. § 100.52(a).

20. National Interest Action Inc. made expenditures in excess of \$1,000 in 2024, totaling at least \$3,529,920.23.

21. In addition to the statutory threshold, a “political committee” must either be under the control of a candidate, or have a “major purpose” of nominating or electing federal candidates. *Buckley v. Valeo*, 424 U.S. 1, (1976). The FEC conducts a fact-intensive, case-by-case analysis of an organization to determine if its major purpose is the nomination or election of federal candidates. Political Committee Status, 72 Fed. Reg. 5595, 5601 (FEC Feb. 7, 2007) (supplemental explanation and justification) (“Supplemental E&J”). An organization can exhibit a qualifying major purpose through its organizational planning documents, *id.*, or through sufficiently extensive spending on federal campaign activity. *See FEC v. Mass. Citizens for Life, Inc.*, 479 U.S. 238, 262 (1986); Supplemental E&J, 72 Fed. Reg. at 5601. Independent expenditures, electioneering communications, and gifts, deposits, or distributions to political committees are qualifying federal campaign activity. Further, under the FECA, an organization’s political committee status is determined by viewing the activities and spending of the organization in the relevant “calendar year.” 52 U.S.C. § 30101(4)(A). Accordingly, an organization’s major purpose must be evaluated on the same time frame.

22. In 2024, National Interest Action Inc.’s spending on independent expenditures amounted to 73.56% of the organizations spending that year. That spending, whether viewed alone or in combination with other expenses to influence federal elections, is sufficiently “extensive” to conclude the organization’s major purpose was to elect or nominate federal candidates. Supplemental E&J, 72 Fed. Reg. at 5605 (noting group devoting at least “50-75%” of spending to campaign activity in a calendar year qualified as political committee); *see also* Factual and Legal Analysis, *In re: Freedom Vote*, MUR 7465 (FEC, July 31, 2019), <https://bit.ly/3S5A9rj> (finding that an organization dedicating more than 61% of its total

spending in a single year to federal campaign activity indicated that its “major purpose may be the nomination or election of federal candidates”).

23. National Interest Action Inc. therefore meets both the statutory and major purpose tests for political committee status in 2024. Accordingly, National Interest Action Inc. became a political committee in 2024.

24. FECA and FEC regulations require all political committees to register with the FEC within 10 days of becoming a political committee. 52 U.S.C. § 30103(a); 11 C.F.R. § 102.1(d).

25. National Interest Action Inc. is not, and has never been, registered, and continues to fail to register, as a political committee with the FEC.

26. By failing to register as a political committee, National Interest Action Inc. violated and is continuing to violate 52 U.S.C. § 30103(a) and 11 C.F.R. § 102.1(d).

27. If this violation was knowing and willful, it is subject to criminal penalties and should be referred to the Department of Justice for investigation. 52 U.S.C. §§ 30109(a)(5)(C), 30109(d)(1).

Count II

28. As a political committee, National Interest Action Inc. was and is required to file periodic reports with the FEC that, among other things: (1) identified all individuals who contributed an aggregate of more than \$200 in a year to National Interest Action Inc., the amount each individual contributed, and the date of the contribution; (2) identified all political committees that made a contribution to National Interest Action Inc., the amount each committee contributed, and the date of the contribution; (3) detailed National Interest Action Inc.’s

outstanding debts and obligations; and (4) listed all of National Interest Action Inc.’s disbursements. 52 U.S.C. § 30104(a)(4); 52 U.S.C. § 30104(b); 11 C.F.R. §§ 104.1(a), 104.8.

29. A political committee is also under a continuous obligation to report any information the committee was previously required to report, but which it did not. *Filing Amendments*, FEC (last visited Mar. 19, 2026) <https://bit.ly/2EbVUkU> (“The committee must file an amended report if it: [d]iscovers that an earlier report contained erroneous information, [or] [d]oes not obtain all of the required information concerning a particular transaction”); *see also* Advisory Opinion 1999-33, *MediaOne PAC*, at 3 (FEC, Jan. 28, 2000) (political committee “must amend” prior erroneous reports that omitted contributor information).

30. As alleged above and incorporated herein, National Interest Action Inc. became a political committee no later than November 1, 2024, the date of its last reported independent expenditure in 2024, and likely earlier. Accordingly, FECA obligated and continues to obligate National Interest Action Inc. to file the required disclosure reports.

31. National Interest Action Inc. failed to file any of these reports with the FEC and continues to fail to file these reports with the FEC. By failing to file these reports, National Interest Action Inc. violated and continues to violate 52 U.S.C. § 30104(a)(4), 52 U.S.C. § 30104(b), and 11 C.F.R. §§ 104.1(a), 104.8.

32. If this violation was knowing and willful, it is subject to criminal penalties and should be referred to the Department of Justice for investigation. 52 U.S.C. §§ 30109(a)(5)(C), 30109(d)(1).

Count III

33. Since its incorporation on May 16, 2024, National Interest Action Inc. has listed Lisa Lisker as its treasurer. *See 2024 Form 990*.

34. As the treasurer of National Interest Action Inc. since 2024, Ms. Lisker has the authority and responsibility at National Interest Action Inc. to sign filings with government agencies on behalf of National Interest Action Inc.

35. As alleged above and incorporated herein, National Interest Action Inc. qualified as a political committee as early as 2024.

36. For the purposes of FECA, therefore, Ms. Lisker was, is, and continues to be treasurer of National Interest Action Inc. since 2024. *See* 52 U.S.C. § 30102(a), (c).

37. Under the FECA, treasurers of political committees like National Interest Action Inc. are responsible for registering them with the FEC and filing disclosure reports as required. 52 U.S.C. § 30104(a); *Treasurer's liability*, FEC (last visited Mar. 19, 2026) <https://bit.ly/3xDCd2J>.

38. A political committee treasurer is personally liable for a failure by the political committee to file required reports. *Id.*; *Statement of Policy Regarding Treasurers Subject to Enforcement Proceedings*, 70 Fed. Reg. 3, 5 (FEC, Jan. 3, 2005).

39. Ms. Lisker is aware of her responsibilities as treasurer and the possibility of personal liability for her failures to carry out her duty. She currently serves as the President of Huckaby Davis Lisker, an FEC compliance firm, and is a “nationally recognized campaign finance expert with over 35 years of experience in compliance.” *See* Our Team, *Huckaby Davis Lisker* (last visited Mar. 19, 2026) <https://tinyurl.com/5bujar8x>. Ms. Lisker has also served, and continues to serve, as treasurer to at least one political committee registered with the FEC. *See* *Committees*, FEC (last visited Mar. 11, 2026) <https://tinyurl.com/5n97cxt4> (searching for “Lisa Lisker” as treasurer, filtering for the Republican party).

40. By failing to cause National Interest Action Inc. to register with the FEC, Ms.

Lisker personally violated and continues to violate 52 U.S.C. § 30103(a) and 11 C.F.R. § 102.1(d).

41. By failing to cause National Interest Action Inc. to file disclosure reports as required by the FECA, Ms. Lisker personally violated and continues to violate 52 U.S.C. § 30104(a)(4), (b), and 11 C.F.R. §§ 104.1(a), 104.8.

42. On information and belief, Ms. Lisker's violations of the FECA were knowing and willful, or she recklessly failed to fulfill duties specifically imposed on treasurers by the Act, or she has intentionally deprived himself of the operative facts giving rise to the violation.

43. If the violations were knowing and willful, they are subject to criminal penalties and should be referred to the Department of Justice for investigation. 52 U.S.C. §§ 30109(a)(5)(C), 30109(d)(1).

Conclusion

WHEREFORE, Citizens for Responsibility and Ethics in Washington requests that the FEC conduct an investigation into these allegations; declare the respondents to have violated the FECA and applicable FEC regulations; and order respondents to correct these violations by filing disclosure reports for National Interest Action Inc. required of political committees that, among other things, identify and make public each person who made contributions aggregating more than \$200. In addition, the complainants request that the FEC impose sanctions appropriate to these violations, and take such further action as may be appropriate, including referring this matter to the Department of Justice for criminal prosecution.

N. Sus

ON BEHALF OF COMPLAINANT
Nikhel Sus
Citizens for Responsibility and Ethics
in Washington
PO Box 14596
Washington, D.C. 20044



VERIFICATION

Citizens for Responsibility and Ethics in Washington hereby verifies that the statements made in the attached Complaint are, upon information and belief, true. Sworn pursuant to 18 U.S.C. § 1001.

N. Sus

Nikhel Sus

Sworn to and subscribed before me this 31st day of March 2026

[Signature]

Notary Public

