

BEFORE THE FEDERAL ELECTION COMMISSION

NRSC
425 2nd Street NE
Washington, DC 20002

v. MUR No. _____

Hallie Shoffner for Arkansas
600 E. Capitol Street
P.O. Box 57
Little Rock, AR 72202

Shelly Baron
600 E. Capitol Street
Little Rock, AR 72202

COMPLAINT

Complainant seeks an immediate investigation into Senate candidate Hallie Shoffner's failure to comply with basic reporting and disclosure requirements mandated by the Federal Election Campaign Act of 1971, as amended, which require every candidate for federal office to file accurate disclosures of all campaign receipts and expenditures on a quarterly basis. Public records show, and an investigation will confirm, that Hallie Shoffner has failed to properly disclose her campaign expenditures in violation of 11 CFR § 104.5(a)(1) and § 102.9(a)-(b).

ARGUMENT

Hallie Shoffner for Arkansas is the principal campaign committee for Hallie Shoffner's candidacy for the U.S. Senate race in Arkansas according to its Statement of Organization.¹ Under federal law governing political committees, "[a]n account shall be kept by any reasonable accounting procedure of all contributions received by or on behalf of the political committee" and, similarly, "[a]n account shall be kept of all disbursements made by or on behalf of the political committee."² Importantly, principal campaign committees of Senate candidates are required to report this accounting of contributions and expenditures every quarter.

Indeed, federal campaign law makes clear:

"Each treasurer of a principal campaign committee of a candidate for the . . . Senate must file quarterly reports on the dates specified in paragraph (a)(1) of this section in both election years and non-election years . . . Quarterly reports must be filed no later than the 15th day following

¹ Fed. Election Comm'n, FEC Form 2 Statement of Candidacy (Sept. 12, 2025), <https://docquery.fec.gov/cgi-bin/forms/S6AR00199/1914678/>.

² 11 CFR § 102.9(a)-(b).

the close of the immediately preceding calendar quarter (on April 15, July 15, and October 15)[.]”³

These federal requirements are foundational to fair elections and ensure that candidates do not misappropriate campaign funds. Nevertheless, despite filing a Statement of Organization and Statement of Candidacy with the Federal Election Commission, Hallie Shoffner has failed to file any receipts or disbursements related to her campaign. The filing of quarterly reports is a basic requirement when running for federal office and they are fundamental to informing the public about a candidate’s sources of support. As you know, the Commission makes the reporting “Dates and Deadlines” publicly accessible on its website so that all candidates are aware of the applicable deadlines.⁴

Because Hallie Shoffner for Arkansas registered with the Commission as a principal campaign committee on May 16, 2025, the committee was required to file its first quarterly report on July 15, 2025.⁵ As of the date of this complaint, no such reports have been filed.⁶

Accordingly, it is imperative that the Commission conduct an investigation and penalize Hallie Shoffner for Arkansas and Shelly Baron in her capacity as treasurer for failing to follow these basic requirements. Hiding campaign contributions and spending is a serious violation and an abuse of the public trust. When Arkansans assess their candidates for public office, they deserve to know who is funding their campaigns and how their campaign funds are being spent.

Respectfully submitted,

Andrew Pardue

Andrew Pardue
Deputy General Counsel, NRSC
425 2nd Street NE
Washington DC 20002

³ 11 CFR § 104.5(a)(1)(i).

⁴ Fed. Election Comm’n, *2025 Quarterly Reports*, available at: <https://www.fec.gov/help-candidates-and-committees/dates-and-deadlines/2025-reporting-dates/2025-quarterly-filers/>.

⁵ Fed. Election Comm’n, FEC Form 1 Statement of Organization (May 16, 2025), <https://docquery.fec.gov/cgi-bin/forms/C00905471/1892468/>.

⁶ Fed. Election Comm’n, *Hallie Shoffner for Arkansas – Committee Filings*, <https://www.fec.gov/data/committee/C00905471/?cycle=2026&tab=filings> (no data available under “Regularly Filed Reports” as of September 15, 2025).

State of Nevada, Clark County

Signed and sworn before me this 16th day of September, 2025

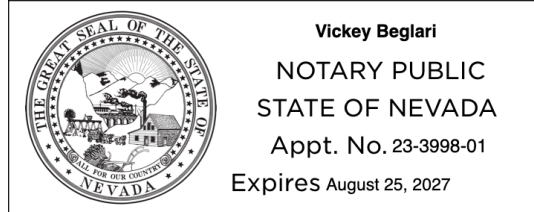
Vickey Beglari

Notary Public

My Commission Expires:

08/25/2027

Date



Notarized remotely using audio-video communication technology via Proof.