IN COMPLIANCE

HOLTZMAN VOGEL'S MONTHLY ROUND-UP

Supreme Court Preview: NRSC v. FEC

On June 30, 2025, the United States Supreme Court agreed to hear what may be the most significant campaign finance case since *Citizens United* freed corporate entities to spend unlimited sums on independent expenditures. In ***National Republican Senatorial Committee (NRSC) v. Federal Election Commission*** **(FEC)**, the Court will consider whether limits on coordinated party expenditures violate the First Amendment. If the Court strikes down these limits, as many observers anticipate, the decision could significantly restructure the campaign spending landscape by allowing the national party committees to freely coordinate with their candidates for the first time in the modern era.

FECA Background

Under the Federal Election Campaign Act of 1974 ("FECA"), national political party committees (such as the RNC and DNC) can support their candidates through direct contributions, which are subject to contribution limits, and through "coordinated party expenditures," which are party-paid expenditures made in consultation with a candidate, but which are also subject to limits.

A national political party committee may contribute up to $5,000 per election to a federal candidate. A separate provision allows the RNC and DNC and their Senate counterparts to contribute a combined $62,000, per campaign, to a Senate candidate. In addition, "the national committee of a political party" (i.e., the RNC and DNC) and "a State committee of a political party" have a **coordinated party expenditure limit**. Currently, that limit stands at $63,600 for House races in multi-district states. Limits for Senate elections and House elections in states with only one House district are tied to the states' voting age populations, and range from $127,200 (in states such as Alaska, Delaware, and Wyoming) to $3,946,100 (in California). The national party congressional committees (i.e., the NRSC, DSCC, NRCC, and DCCC) have no explicit coordinated expenditure authority under FECA, although FEC regulations allow the RNC, DNC, and state party committees to **assign their spending authority** to these entities, which is a common practice.

U.S. Supreme Court, 2001: Colorado II

In 2001, the Supreme Court, by a vote 5-4, upheld the constitutionality of the coordinated party expenditure limits in **FEC v. Colorado Republican Federal Campaign Committee** (known as *Colorado II*). An earlier, related decision, known as *Colorado I*, held that political party committees have a right to make unlimited independent expenditures. Combined, these two decisions yielded the current state of the law in which national party committees make *limited* coordinated expenditures with their candidates and also establish separate, firewalled "independent expenditure units" to engage in *unlimited* independent spending. Because a party committee's IE Unit must be funded with contributions to the party that are subject to contribution limits, much independent expenditure activity has shifted to Super PACs, which are not subject to contribution limits, following *Citizens United* and related cases.

After *Colorado II*, changes in the Supreme Court's membership resulted in significant changes to its campaign finance jurisprudence. The only current member of the Court who took part in *Colorado II* is Justice Thomas, who wrote the dissenting opinion. As demonstrated most clearly in *Citizens United*, the Court under Chief Justice Roberts has taken a more skeptical view of campaign finance restrictions and has adopted a narrower definition of the type of corruption that can justify such limits. As a result, many believe that the rationale underlying *Colorado II*—namely, that unlimited coordinated spending between parties and candidates can corrupt the candidates or create the appearance of corruption—would no longer command majority support on the current Court.

Against this background, the NRSC, NRCC, J.D. Vance (in his capacity as a former Senator), and former Ohio Representative Steve Chabot filed this lawsuit in 2022 with the aim of overturning *Colorado II*.

The 6th Circuit's Decision

In September 2024, the *en banc* U.S. Court of Appeals for the Sixth Circuit released its decision in ***NRSC et al. v. FEC et al.*, No. 24-3051**. The Sixth Circuit, by a vote of 15-1, with all active judges participating, declined to distinguish the case from Supreme Court precedent and denied the NRSC's request to strike down the coordinated limits. All but one of the judges agreed that the outcome of this challenge was controlled by the Supreme Court's decision in *Colorado II*. However, at least six of the sixteen judges expressed serious concerns with the constitutionality of the coordinated expenditure limits, and Judge Readler issued a dissenting opinion arguing that the court should strike down the limits notwithstanding *Colorado II*. In a concurring opinion, joined by three of his colleagues, Judge Thapar wrote that the *Colorado II* decision "allows us to dodge the grave constitutional issues posed by coordinated-party-spending limits," which "run afoul of modern campaign-finance doctrine and burden parties' and candidates' core political rights."

Return to the Supreme Court

After the NRSC, NRCC, Vance, and Chabot sought review by the Supreme Court, the Department of Justice took the unusual step of informing the Court that it would not defend the constitutionality of the limits. In the government's **brief for the FEC**, the Solicitor General explained that "[t]he government agrees with the petitioners that the challenged statute abridges the freedom of speech under this Court's recent First Amendment and campaign-finance precedents" and urged the Court to "reverse the judgment" of the Sixth Circuit. Subsequently, the DNC, DSCC, and DCCC **filed a motion to intervene** for the purpose of defending the expenditure limits the law imposes on them, which the Court granted. The Supreme Court will hear the case during its October 2025 term, and a decision is expected by June 2026.

If the Court invalidates the federal limits on coordinated party spending, the effects would be far-reaching. Most immediately, the need for national party committees to maintain IE Units would disappear, since party committees and candidates would be able to coordinate all their activities without being forced to navigate the existing spending limits. Party committees could greatly reduce or eliminate altogether their independent expenditure programs, leaving that activity to Super PACs and other independent entities.

IRS Enters into Consent Decree Limiting Application of Johnson Amendment; New Position Allows Churches to Endorse Candidates in Certain Situations

On July 7, 2025, in ***National Religious Broadcasters, et al. v. Billy Long, Commissioner of the Internal Revenue Services, et al.,*** Docket no: 6:24-cv-00311-JCB (E.D. Texas) ("*NRB*"), the IRS agreed to enter into a consent decree in which it agreed that the Johnson Amendment, which has long conditioned section 501(c)(3) tax exempt status on refraining from partisan political activity, cannot be applied to churches and other houses of worship in certain specific circumstances. The consent decree has not yet been accepted by the court.

Background

The Johnson Amendment is the portion of Internal Revenue Code section 501(c)(3) that requires all charitable organizations, including churches, to refrain from endorsing or opposing candidates for public office as a condition of their tax-exempt status. The statute provides that these organizations may not "participate in, or intervene in (including the publishing or distributing of statements), any political campaign on behalf of (or in opposition to) any candidate for public office." The amendment was sponsored by then-Senator Lyndon Johnson and became law in 1954. Since then, section 501(c)(3) organizations have been unable to endorse or support candidates for political office without risking the loss of their tax-exempt status.

The Plaintiffs: National Religious Broadcasters

In *NRB*, the plaintiffs, a group of conservative religious organizations, argued that the Johnson amendment violated their First Amendment rights to freedom of speech and free exercise of religion, as well as due process, equal protection, and certain statutory rights, and asked the court to enjoin the IRS from enforcing the Johnson Amendment.

In the consent decree, which would settle the litigation if accepted by the court, the IRS agreed that the Johnson Amendment, "as properly interpreted" does not prevent a "house of worship" from speaking "to its congregation, through customary channels of communication on matters of faith in connection with religious services, concerning electoral politics viewed through the lens of religious faith."

What It Means

Although it appears to have been IRS practice for many years not to enforce the Johnson Amendment "against houses of worship for speech concerning electoral politics in the context of worship services," the IRS has never before publicly agreed not to enforce the Johnson Amendment, nor has it issued any formal written guidance suggesting that the Johnson Amendment may run afoul of the Constitution. Thus, the IRS's agreement to the language in the consent decree is a significant and consequential concession.

Religious organizations may now consider making candidate endorsements and urge their congregations to vote accordingly. Of course, these scenarios must be evaluated in light of the language in the consent decree, namely that the communications must occur through customary channels of communication, in connection with religious services, and through the lens of religious faith. But the IRS sanctioning a path through which tax-exempt religious organizations may make electoral communications is a departure from longstanding past practice.

Additionally, it is important to note that the IRS's acquiescence in *NRB* is limited. Technically, the consent decree in *NRB* applies only to the plaintiffs in the case, although the IRS will likely apply the same rule to all similarly situated organizations. Still, the IRS has not issued formal administrative guidance stating its position and intention not to enforce the Johnson Amendment in the described circumstances. In addition, the consent decree is limited in scope and is not a license for religious organizations to begin functioning as campaign operations. Rather, the new exemption applies only if the plaintiffs engage in the speech specifically described by the IRS— namely, speech delivered through customary channels to congregations on matters of faith, in connection with religious services, that concerns electoral politics viewed through the lens of religious faith.

Court Upholds FEC's Express Advocacy Interpretation but Finds Dismissal Reasoning Too Conclusory; Commissioners Issue Clarifying Statement Regarding Montana Senate Ads

On June 26, the U.S. District Court for the District of Columbia **held** that the FEC's **dismissal** of a complaint alleging that ads aired during Montana's 2024 Senate primary should have been reported as independent expenditures was based on a permissible interpretation of the "express advocacy" standard. However, the court found that the Commission failed to adequately explain its conclusion that the ads did not meet that standard and, consequently, remanded the matter for a fuller rationale.

The dispute concerned the Last Best Place PAC, a Super PAC that spent millions on advertisements that were critical of then-Senate candidate (and now Senator) Tim Sheehy. The Campaign Legal Center filed a **complaint** with the FEC alleging that the ads included express advocacy and that the PAC's failure to file independent expenditure reports violated the Federal Election Campaign Act's (FECA) disclosure requirements.

The ads, titled "Shady Sheehy" and "Millionaire Politician," ran nine months before the Senate primary and criticized Sheehy's character and financial history, accused him of "trying to buy our Senate seat," and claimed he was "another millionaire politician who says one thing and does another." An FEC majority concluded that the ads' character attacks did not meet the **definition of express advocacy**, reasoning that the timing of the ads—which were run well before the election—made it "more likely that reasonable minds could differ about whether the ad constitutes an 'exhortation to vote for or against a specific candidate.'"

The court **held** that the FEC's consideration of an ad's proximity to an election as a factor in its express advocacy analysis was appropriate, finding that "the FEC's observation about timing is based on a permissible interpretation of FECA." Nevertheless, the court also concluded that the FEC failed to sufficiently explain why the Montana ads did not trigger the express advocacy standard and sent the matter back to the agency for reconsideration.

On July 15, Commissioners Trainor and Lindenbaum—who were part of the initial Commission majority—issued a **Supplemental Statement of Reasons** to comply with the court's order. The statement explained that while the ads were critical of Sheehy, they lacked any direct call to electoral action, and "did not meet the very high bar of having no other reasonable meaning than to encourage actions to elect or defeat the candidate in question." Instead, "the ad could be reasonably interpreted as framing the issues of the election around corruption, honesty and character without encouraging the listener to take any electoral action given the very early stage of the election." Commissioners Trainor and Lindenbaum reiterated that the early timing of the ads in the Montana Senate primary weighed against treating them as express advocacy.

Commissioner Shana also issued a **supplemental** statement, and again argued the ads urged Sheehy's defeat and should have been reported as independent expenditures.

The FEC currently lacks a quorum of Commissioners, as two members of the four-vote majority that found no express advocacy and voted to dismiss the complaint —Sean Cooksey and Allen Dickerson —have since left the agency. In late July, the FEC moved to stay the case until the agency's quorum is restored and asked the court to treat the Trainor/Lindenbaum statement of reasons as a good faith effort to comply with the court's order in the event a stay is denied. In response, the court extended the FEC's deadline to conform with its previous order by 60 days.

Second Circuit Overturns Conviction of Election Meme Poster Douglass Mackey

On July 9, the **Second Circuit overturned the conviction** of Twitter (now X) user, Douglass Mackey, for posting memes prior to the 2016 presidential election indicating that Hillary Clinton supporters could vote by text message. The memes at issue were posted only briefly before being removed by Twitter, and the Clinton campaign was able to respond to persons who texted in response to the memes or similar postings circulating on the internet.

Over four years after the memes were posted, and just days after President Biden took office in January 2021, federal prosecutors charged Mackey with conspiracy to injure, oppress, threaten and intimidate persons in the free exercise and enjoyment of the right to vote in violation of federal statute. He was convicted by a jury in the Eastern District of New York of "conspiring to injure citizens in the exercise of their right to vote in violation of 18 U.S.C. § 241" and **sentenced to seven months in prison.** On appeal, Mackey argued that there was insufficient evidence to show that he "knowingly agreed to join the charged conspiracy" and the Second Circuit agreed. The Second Circuit also noted that "[t]he government presented no evidence at trial that Mackey's tweets tricked anyone into failing properly to vote."

Mackey's conviction was not overturned on simple First Amendment freedom of speech grounds, which were rejected by the district court judge. Instead, the Second Circuit agreed that prosecutors had not proven that Mackey conspired with others, which was as key element of the crime with which he was charged. The government's evidence of conspiracy was Mackey's sometimes participation in private chat rooms, although Mackey appears not to have participated in those chats in the weeks leading up to his meme postings and "notably absent from [the] evidence was a single message from Mackey in any of these direct message groups related to the scheme." Accordingly, the court concluded that prosecutors failed "to show that Mackey knowingly entered into an agreement with other people" to "injure other citizens in the exercise of their right to vote, reversed Mackey's conviction, and directed the district court to enter a judgment of acquittal.

Challenge to FEC's Conduit Reporting Rules Dismissed; Appeal Filed

On July 9, the District Court for the Northern District of Texas **dismissed a challenge** to the constitutionality of the conduit disclosure requirement in the Federal Election Campaign Act (FECA). When an individual makes a contribution directly to a federal candidate, political party, or PAC, the recipient is required to itemize that contribution, and disclose the contributor's name, address, occupation, and employee on its FEC report, only if the aggregate value of that donor's contributions exceeds $200. However, if the same contribution is made through an intermediary platform such as WinRed or ActBlue, the intermediary is required to itemize and disclose the contribution on its FEC report regardless of the amount. This results in small-dollar donors—including those giving as little as a dollar—being publicly disclosed in FEC reports simply because they donated through an intermediary. The lawsuit alleged that WinRed disclosed over 55 million contributions of $200 or less from 2023-2024, while ActBlue disclosed over 115 million such contributions during the same period.

McDonald is a Republican voter who is involved with his local county party organization. He contributed $1 to Democrat Marianne Williamson's 2020 Presidential Campaign, claiming that he did so to help her qualify for the presidential debates rather than to support her candidacy. (Political parties frequently include a number-of-donors threshold requirement in their debate qualification rules.) This $1 contribution was disclosed by ActBlue on its FEC report.

The plaintiff, Tony McDonald, argued that the "conduit" reporting requirement is unconstitutional and cannot be justified for contributions of $200 or less. The district court dismissed the case, finding that McDonald failed to plead a concrete, non-speculative injury that would support his standing to sue. While McDonald claimed that his speech was chilled because he would have to explain his contribution to Marianne Williamson, and it could harm his local Republican Party's reputation, Judge Pittman noted that McDonald did not allege that either actually occurred and that the harms alleged were only speculative and insufficient to maintain the lawsuit. The Plaintiff, McDonald, filed a **notice of appeal** with the Fifth Circuit.

While the FEC has defended the disclosure requirements in this lawsuit (and in another similar case filed in **Ohio**), the FEC has also recommended that Congress change the law to eliminate this disclosure disparity. The FEC's **2024 Legislative Recommendations** called on Congress to "amend FECA's reporting requirement [for conduit contributions] to establish an itemization threshold consistent with other FECA reporting requirements."

Defending America's Sovereignty Through FARA – Sun Case Exposes States' Vulnerabilities

Joe Burns and Kellen Dwyer wrote an article for ***The National Law Review*** on Linda Sun, a former top aide to New York Governor Kathy Hochul, who will stand trial in November for allegedly secretly acting as an agent of officials from the Chinese consulate in New York while serving in state government. Sun is accused of arranging diplomatic meetings, influencing state policy toward Taiwan, altering public messaging to suit Beijing's preferences, and accepting lavish gifts for doing China's bidding. And this was all done without disclosing her relationship with the foreign government alleged to have directed her.

Fuld v. PLO: A Victory for American Victims of Terror

In a landmark decision issued in June, a unanimous Supreme Court held in ***Fuld v. PLO*** that the Palestinian Authority (PA) and the Palestine Liberation Organization (PLO) can be sued in U.S. courts for supporting terrorism abroad. For years, the Second Circuit had dismissed such suits for lack of jurisdiction. But the high court reversed course, siding with American victims of terrorism. The decision marks a significant victory in the fight against terror and affirms Congress's authority in that effort. Erielle Azerrad and Mark Pinkert explained the implications of the Supreme Court's decision in *Fuld v. PLO* in ***City Journal***.

U.S. House Ethics Committee Concludes AOC Violated Ethics Rules at Met Gala

On July 25, the U.S. House of Representatives Committee on Ethics **issued a report** finding Representative Alexandria Ocasio-Cortez in violation of ethics rules. The Committee's investigation and findings related to Representative Ocasio-Cortez's highly publicized attendance at the Met Gala, the celebrity fundraising event she attended wearing a custom-made dress emblazoned with the words "Tax the Rich." The allegations against Representative Ocasio-Cortez center on gift rule violations and whether she failed to pay full market value for the items she wore to the event.

In addition to receiving free (and permissible) attendance at the charity event, "Representative Ocasio-Cortez was provided with a designer gown, handbag, shoes, jewelry, and a floral hairpiece, and hair, makeup, transportation, and ready-room services for herself, as well as a bowtie, shoes, and tailoring services for Mr. Roberts." The Committee found that "Representative Ocasio-Cortez ultimately paid for most of the goods and services received out of personal funds, although the payments were significantly delayed and some payments fell short of fair market value." The Committee concluded that Representative Ocasio-Cortez should pay an additional $2,700 for the goods she received in order to comply with U.S. House gift rules, plus the cost of her partner's event ticket.

Wisconsin Supreme Court Rejects Challenges to State's Congressional Districting Maps

In late June, the Wisconsin Supreme Court **declined to hear** lawsuits challenging the state's current congressional maps, leaving in place a map that favors Republicans ahead of the 2026 midterm elections. Wisconsin's current U.S. House delegation includes six Republicans and two Democrats. The Court issued two unsigned orders raising questions about whether a legal path forward for future challenges exists.

Redistricting was a key issue in Wisconsin's April Supreme Court race between conservative Brad Schimel and liberal Susan Crawford. Supporters of both candidates emphasized the possibility of a redistricting lawsuit as a reason for voters and donors to get involved. Conservatives argued that regaining a conservative majority would block Democrats' efforts to redraw maps, while liberals hoped a liberal majority would open the door to legal challenges.

The rejected lawsuits were filed in May, shortly after liberals retained their 4–3 majority on the state Supreme Court with the election of Justice-elect Susan Crawford.

One lawsuit, filed on behalf of Democratic candidates and voters, challenged the current map as a partisan gerrymander that violates the Wisconsin Constitution's equal protection guarantees by discriminating against Democrat voters. A **second lawsuit**, brought by the Campaign Legal Center, focused on population deviations between districts and alleged that these disparities rendered the map unconstitutional. The Wisconsin Supreme Court's refusal to hear the cases marks the second time in two years it has declined to reconsider the congressional map. In 2023, it rejected a prior challenge without explanation. This week's unsigned orders similarly provided no reasoning.

Federal Appeals Court Blocks Maine Law Restricting Campaign Spending by U.S. Companies with Foreign Ties

A federal appeals court **upheld a lower court's decision** to block a Maine law that sought to restrict campaign spending by entities with foreign ties. The law prohibited campaign spending by entities with even minimal foreign ownership or influence. While the law was popular—approved by 86% of voters—the Court noted that it raised serious constitutional concerns.

The case arose from objections to political spending by utility companies involved in a controversial energy transmission project. Central Maine Power and Versant Power, both incorporated in Maine but owned in part by foreign entities, had spent millions opposing ballot initiatives that threatened their operations.

In response, Maine voters approved a ballot initiative called "An Act to Prohibit Campaign Spending by Foreign Governments." The law aimed to prevent foreign governments and "foreign government-influenced entities" from spending money to influence state elections or ballot initiatives. It defined "foreign government-influenced entities" as any entity with at least 5% foreign ownership or influence.

While the Court acknowledged that Maine has a compelling interest in preventing direct foreign government interference in state elections, the Court found that the law swept too broadly. The law's definition of "foreign government-influenced entity" was overly broad because it included any company with just 5% foreign ownership—even if the company was based in the U.S. and operated entirely under domestic control. Such restrictions, the Court held, were not narrowly tailored and risked suppressing legitimate political speech.

Importantly, the Court rejected the notion that the mere appearance of foreign influence is a sufficient basis to restrict speech. It reaffirmed that the First Amendment protects the rights of American corporations to participate in public debate, even when they have foreign shareholders.

The case represents the first time a federal appeals court has ruled on the issue of election spending by so-called "foreign influenced" entities. Earlier this year, a federal district court invalidated a **similar Minnesota law**.

Latest Effort in Montana to Circumvent Citizens United Would Redefine Corporate Authority to Prohibit Election Spending

A new effort to circumvent the Supreme Court's decision in *Citizens United* was recently unveiled in Montana. In *Citizens United*, the Supreme Court held that the First Amendment prohibits the government from restricting a corporation's independent expenditures. Federal, state, and local laws that purport to do so are unconstitutional.

The Transparent Election Initiative recently introduced a **proposed state ballot initiative** to amend Montana's state constitution to "bypass[] *Citizens United*." Under the so-called "Montana Plan," a state constitutional amendment would revoke all statutorily-granted corporate authority, and re-grant that authority under the state constitution with new limitations. Specifically, all "artificial persons" (including Montana-organized business corporations, nonprofit corporations, LLCs, LLPs, and other business organizations with legal status) would be barred, as a matter of state corporate law, from engaging in "election activity" and "ballot issue activity." Foreign corporations (i.e., those organized in states other than Montana) would be prohibited from engaging in Montana election and ballot issue activity by a provision that extends the new restrictions to any entity that "transacts business" in Montana. Supporters of the initiative seek to qualify it for the 2026 ballot.

This is not the first Montana-based effort to circumvent *Citizens United*. A **2011 decision of the Montana Supreme Court** held that Montana's prohibition on corporate election spending was *not* invalidated by *Citizens United* because of Montana's allegedly unique history as a state. The U.S. Supreme Court rejected the openly defiant ruling. In a brief ***per curiam* opinion**, the Supreme Court explained, "[t]he question presented in this case is whether the holding of *Citizens United* applies to Montana state law. There can be no serious doubt that it does."

In addition to destabilizing Montana's business organization laws, if the Transparent Election Initiative's proposed constitutional amendment were approved, it would immediately raise the question of whether the First Amendment allows states to do through corporate organization laws what they may not do through election laws.

New Yorkers Not Likely to See Musk's America Party on a Ballot Anytime Soon

Joe Burns **explains** in *The National Law Review* that New York election law prohibits a political party from including the words "America," "American," or any abbreviation or plural thereof, in its name. The prohibition is designed to ensure that parties are not implying any sort of governmental authority or endorsement. As a result, even if Elon Musk successfully builds public support for his new party in the Empire State, neither the party nor its candidates would be allowed to appear on the ballot under the banner of the "America Party."

Controversial New York Judicial Reorganization Bill Likely Headed to Governor's Desk

Before adjourning for the year, the New York State Legislature **passed a bill** that could significantly reshape how many New Yorkers elect Justices of the New York State Supreme Court. The measure, if signed into law by Governor Kathy Hochul, would create two new judicial districts and redraw the lines of three existing ones within the Appellate Division, Fourth Department. The proposal affects the Fifth, Seventh, and Eighth Judicial Districts, each of which currently includes one urban county (Onondaga, Monroe, and Erie, respectively) along with a broader ring of rural counties. The bill would separate those urban centers into standalone districts while consolidating the rural counties into two newly configured districts.

HV Making the Rounds

- David Johnson, former General Counsel and Policy Director for the Republican Attorneys General Association, joined the firm and expands our growing political law and state attorneys general practices.
- We added former Assistant U.S. Attorney for Department of Justice, Alexandria Saquella, to the Phoenix Office.
- Holtzman Vogel added former General Counsel and Senior Policy Advisor for the Ethics and Religious Liberty Commission, Palmer Williams, to the Nashville office.
- Susan Greene and Mark Pinkert authored "The Fusion of Anti-Zionism and Social Justice" for the *National Review*.
- The U.S. Commission on Civil Rights appointed Brandon Smith as Chair to the Tennessee advisory committee.
- Mark Pinkert spoke on a panel, "Supreme Court Review and the State of Humphrey's Executor," for the Federalist Society's 2025 Florida Young Lawyers Summit.
- Joseph Burns and Kellen Dwyer co-authored "New York's Public Campaign Finance Program Goes on Trial: The Dao Ying Prosecution" for *The National Law Review.*
- Randall Raban spoke at a NBI CLE program on "Agricultural Real Estate Transactions - Cultivating Success: Legal Insights for Agricultural Land Deals."
- The firm finalized a lease for its upcoming Miami office at the iconic Ryder Collonade building in Coral Gables.
- Robert Volpe, Mo Jazil and Darrin Taylor spoke on environmental and land use law at the annual Environmental Permitting School in Florida.
- Jill Vogel appeared on John Fredericks Radio to talk about elections.
- Joe Burns authored "Hipster Tammany Hall is Here" for the *National Review*.
- Mark Pinkert authored "What Mahmoud v. Taylor Means for Anti-Zionism in Public Education" for *The National Law Review*.
- Susan Greene authored "Zohran Mamdani's disdain for the law is disqualifying — and dangerous" for the *New York Post*.
- Jonathan Fahey and Andy Gould appeared on Fox to talk immigration.
- Jason Torchinsky was quoted in *National Journal* article, "The Supreme Court case that could upend the world of campaign fundraising."

UPCOMING EVENTS

- August 15-16 - We will be at the Republican National Lawyers Association Election Law Seminar which will be held in Nashville. Drew Marvel and Dallin Holt will be speaking.
- August 23 - The firm will have a table at the annual Tennessee GOP Dinner.
- September 9-10 - Holtzman Vogel is a sponsor of Public Affairs Council's Government Relations and Policy Conference. Jill Vogel will be speaking.
- September 10-12 - Holtzman Vogel is now a member of the Republican Attorneys General Association and David Johnson, Mo Jazil, Brandon Smith and Mark Pinkert will be attending its fall meeting in Miami.
- September 12 - We are a proud sponsor of The Federalist Society's Tennessee Chapter Conference.
- September 16 - Oliver Roberts will present a CLE for the Nashville Bar Association on "Ethical Considerations for Lawyers Using AI."
- September 19 - Jill Vogel will be a panelist at the 2025 PLI Corporate Political Activities conference on the topic of "Hot Topics in Political and Election Law."

This update is for informational purposes only and should not be considered legal advice. Entities should confer with competent legal counsel concerning the specifics of their situation before taking any action.

Please reach out to one of the following compliance partners or your personal Holtzman Vogel contact with any questions.

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