

OFFICE OF
GENERAL COUNSEL
FEDERAL ELECTION COMMISSION

2018 AUG -9 PM 2:11

In the matter of:

LZP, LLC
Honor and Principles PAC
Lisa Lisker, as treasurer, Honor and Principles PAC
Unknown Respondent (or Respondents)

MUR 74604

COMPLAINT

1. Citizens for Responsibility and Ethics in Washington (“CREW”) and Noah Bookbinder bring this complaint before the Federal Election Commission (“FEC”) seeking an immediate investigation and enforcement action against LZP, LLC, Honor and Principles PAC, its treasurer, Lisa Lisker, and an Unknown Respondent (or Respondents) for direct and serious violations of the Federal Election Campaign Act (“FECA”).

Summary

2. The FECA prohibits making and knowingly accepting a contribution in the name of another person, as well as knowingly permitting one’s name to be used to effect a contribution in the name of another person. This complaint concerns a remarkable four-day period in late March 2018 in which a conduit contribution scheme that violated the FECA seemingly took place. Those four days started with the formation of a federal super PAC called Honor and Principles PAC, followed the next day by the establishment in Ohio of a nonprofit limited liability company, LZP, LLC (“LZP”). The day after that, LZP made a \$175,000 contribution to Honor and Principles PAC, even though it has no known business activity and it is virtually impossible that it generated sufficient income to pay for the contribution in just one day.

Completing the cycle, the day after Honor and Principles PAC received the money (the only contribution it has ever reported), it spent \$163,838 on an independent expenditure advertisement criticizing an Ohio state representative and endorsing his primary opponent. This appears to be a prototypical example of a conduit contribution scheme in which an Unknown Respondent (or Unknown Respondents) used LZP as a conduit to make a contribution to Honor and Principles PAC, which then spent the money on political ads. These apparent violations of law deprive the public of important information and should be investigated.

Complainants

3. Complainant CREW is a 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 citizens 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.

4. In furtherance of its mission, CREW seeks to expose unethical and illegal conduct of those involved in government. One way CREW does this is by educating citizens regarding the integrity of the electoral process and our system of government. Toward this end, CREW monitors the campaign finance activities of those who run for federal office and those who make expenditures to influence federal elections, 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 violations and filing complaints with the FEC serves 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.

5. In order to assess whether an individual or entity is complying with federal campaign finance law, CREW needs the information contained in disclosure reports political committees must file pursuant to the FECA, 52 U.S.C. § 30104; 11 C.F.R. § 104.1 *et seq.* CREW is hindered in its programmatic activity when an individual or entity fails to disclose campaign finance information in reports required by the FECA.

6. 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 or 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.

7. Complainant Noah Bookbinder is the executive director of Citizens for Responsibility and Ethics in Washington. At all times relevant to the complaint, he has been and remains a citizen of the United States and a registered voter and resident of Maryland. As a registered voter, Mr. Bookbinder is entitled to receive information contained in disclosure reports required by the FECA, 52 U.S.C. § 30104; 11 C.F.R. § 104.1 *et seq.* Mr. Bookbinder is harmed when an individual, candidate, political committee, or other entity fails to report campaign finance activity as required by the FECA. Mr. Bookbinder is further harmed when the FEC fails

to properly administer the FECA's reporting requirements, limiting his ability to review campaign finance information.

Respondents

8. LZP, LLC is a Domestic Nonprofit Limited Liability Company organized and registered in Ohio. LZP, LLC, Articles of Organization for a Domestic Limited Liability Company, <https://bit.ly/2HCJKAY> (attached as Exhibit A). LZP was formed and/or incorporated on March 27, 2018. *Id.* It is not known if LZP conducts any business or has generated any income.

9. Honor and Principles PAC is an independent expenditure-only committee ("super PAC") established on March 26, 2018. Honor and Principles PAC, FEC Form 1, Statement of Organization (Mar. 26, 2018) (excerpts attached as Exhibit B).

10. Lisa Lisker is treasurer of Honor and Principles PAC. Exhibit B.

11. Unknown respondent (or respondents) are the true source or sources of funds LZP transferred to Honor and Principles PAC, as well as the conduit or conduits, if any, through which such funds passed before being contributed to LZP.

Factual Allegations

12. Honor and Principles PAC was established on March 26, 2018. One day later, on March 27, LZP was formed and/or incorporated.

13. The next day, March 28, LZP made a \$175,000 contribution to Honor and Principles PAC. Honor and Principles PAC, FEC Form 3X, 2018 April Quarterly Report, at 6 (Apr. 15, 2018) (excerpts attached as Exhibit C). LZP is the only contributor reported by Honor and Principles PAC. *Id.*

14. On March 29, 2018, LZP's contribution to Honor and Principles PAC was used to pay \$163,838 to Target Enterprises, LLC, a "strategic media placement company," for a "Non Federal IE-Media Buy." *Id.*; Target Enterprises, About, <https://bit.ly/2J8ljJG>. Soon after, an ad criticizing Ohio state Representative Larry Householder (R-72) and endorsing his primary opponent, Kevin Black, began airing on Ohio television stations. Twitter, Medium Buying, Apr. 1, 2018, <https://bit.ly/2qwXSUD>; Ohio House of Representatives, Representative Larry Householder (R), <https://bit.ly/2HNB2PV>; Black announces for 72nd House District, *Coshocton Tribune*, Feb. 9, 2018, <https://ohne.ws/2J1do1A>.

15. Honor and Principles PAC's disclosure report provides little information about LZP. The only information provided is that LZP's address is 10 West Broad St., Columbus, OH 43215. *Id.* As LZP's Ohio registration indicates, that is also the address of LZP's registered agent, James G. Ryan, a lawyer at the firm Bailey Cavalieri in Columbus. Exhibit A. Bailey Cavalieri, James G. Ryan, Member, <https://bit.ly/2qMoZKu>.

16. On information and belief, LZP did not generate sufficient income in the one day between its formation and the date on which it contributed \$175,000 to Honor and Principles PAC to account for the contribution. LZP does not appear to conduct any business, and it does not have a presence on the Internet. Rather, it appears an Unknown Respondent (or Respondents) provided the \$175,000 to LZP to make the contribution to Honor and Principles PAC.

Count I

17. The FECA and FEC regulations prohibit making a contribution in the name of another person and knowingly permitting one's name to be used to effect a contribution in the name of another person. 52 U.S.C. § 30122; 11 C.F.R. § 110.4(b).

18. An Unknown Respondent (or Respondents) appears to have made a \$175,000 contribution to Honor and Principles PAC in the name of LZP in violation of 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b).

19. LZP appears to have correspondingly violated 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b) by knowingly permitting its name to be used to effect a \$175,000 contribution by Unknown Respondent (or Respondents) to Honor and Principles PAC.

20. If these 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).

Count II

21. The FECA and FEC regulations also prohibit knowingly accepting a contribution made by one person in the name of another person. 52 U.S.C. § 30122; 11 C.F.R. § 110.4(b).

22. Honor and Principles PAC and Ms. Lisker appears to have violated 52 U.S.C. § 30122 and 11 C.F.R. § 110.4(b) by knowingly accepting a contribution made by Unknown Respondent (or Respondents) in the name of LZP.

23. If these 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 and Noah Bookbinder request 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 amending Honor and Principles PAC's disclosures to identify and make public the source(s) of the contribution to the PAC. In addition, respondents request that the FEC impose sanctions appropriate to these violations and take such further action as may be appropriate, including referring this case to the Department of Justice for criminal prosecution.



ON BEHALF OF COMPLAINANTS

Noah Bookbinder
Executive Director
Citizens for Responsibility and Ethics in
Washington
455 Massachusetts Ave. N.W.
Washington, D.C. 20001
(202) 408-5565 (phone)
(202) 588-5020 (fax)

VERIFICATION

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



Noah Bookbinder

Sworn to and subscribed before me this 8 day of Aug, 2018



Notary Public



EXHIBIT A



DATE	DOCUMENT ID	DESCRIPTION	FILING	EXPED	CERT	COPY
04/06/2018	201808600966	DOMESTIC NONPROFIT LLC - ARTICLES OF ORG (LCN)	99.00	0.00	0.00	0.00

Receipt

This is not a bill. Please do not remit payment.

BAILEY CAVALIERI LLC
10 WEST BROAD STREET, SUITE 2100
COLUMBUS, OH 43215

**STATE OF OHIO
CERTIFICATE**

**Ohio Secretary of State, Jon Husted
4158880**

It is hereby certified that the Secretary of State of Ohio has custody of the business records for
LZP, LLC

and, that said business records show the filing and recording of:

Document(s)

DOMESTIC NONPROFIT LLC - ARTICLES OF ORG
Effective Date: 03/27/2018

Document No(s):

201808600966



United States of America
State of Ohio
Office of the Secretary of State

Witness my hand and the seal of the
Secretary of State at Columbus, Ohio this
6th day of April, A.D. 2018.

Jon Husted

Ohio Secretary of State

Form 533A Prescribed by:

Date Electronically Filed: 3/27/2018

JON HUSTED
Ohio Secretary of State



Toll Free: (877) SOS-FILE (877-787-3453) | Central Ohio: (614) 466-3910
www.OhioSecretaryofState.gov | busserv@OhioSecretaryofState.gov
File online or for more information: www.OHBusinessCentral.com

For screen readers, follow instructions located at this path.

Articles of Organization for a Domestic Limited Liability Company

Filing Fee: \$99
Form Must Be Typed

CHECK ONLY ONE (1) BOX

(1) Articles of Organization for Domestic For-Profit Limited Liability Company (115-LCA)

(2) Articles of Organization for Domestic Nonprofit Limited Liability Company (115-LCA)

Name of Limited Liability Company

(Name must include one of the following words or abbreviations: "limited liability company," "limited," "LLC," "L.L.C.," "Ltd.," or "Ltd.")

Optional: Effective Date (MM/DD/YYYY) (The legal existence of the corporation begins upon the filing of the articles or on a later date specified that is not more than ninety days after filing.)

Optional: This limited liability company shall exist for Period of Existence

Optional: Purpose

**** Note for Nonprofit LLCs**
The Secretary of State does not grant tax exempt status. Filing with our office is not sufficient to obtain state or federal tax exemptions. Contact the Ohio Department of Taxation and the Internal Revenue Service to ensure that the nonprofit limited liability company secures the proper state and federal tax exemptions. These agencies may require that a purpose clause be provided. **

Original Appointment of Statutory Agent

The undersigned authorized member(s), manager(s) or representative(s) of

LZP, LLC

(Name of Limited Liability Company)

hereby appoint the following to be Statutory Agent upon whom any process, notice or demand required or permitted by statute to be served upon the corporation may be served. The complete address of the agent is:

JAMES G. RYAN, SQ.

(Name of Statutory agent)

10 WEST BROAD STREET, SUITE 2100

(Mailing Address)

COLUMBUS

(Mailing City)

OH

(Mailing State)

43215

(Mailing ZIP Code)

Acceptance of Appointment

The Undersigned,

JAMES G. RYAN, ESQ.

(Name of Statutory agent)

, named herein as the

Statutory agent for

LZP, LLC

(Name of Limited Liability Company)

hereby acknowledges and accepts the appointment of statutory agent for said limited liability company.

Statutory Agent Signature

JAMES G. RYAN, ESQ.

(Individual Agent's Signature / Signature on Behalf of Business Serving as Agent)

By signing and submitting this form to the Ohio Secretary of State, the undersigned hereby certifies that he or she has the requisite authority to execute this document.

Required

Articles and original appointment of agent must be signed by a member, manager or other representative.

If the authorized representative is an individual, then they must sign in the "signature" box and print his/her name in the "Print Name" box.

If the authorized representative is a business entity, not an individual, then please print the entity name in the "signature" box, an authorized representative of the business entity must sign in the "By" box and print his/her name and title/authority in the "Print Name" box.

JAMES G. RYAN

Signature

By (if applicable)

Print Name

Signature

By (if applicable)

Print Name

Signature

By (if applicable)

Print Name

EXHIBIT B

**FEC
FORM 1**

**STATEMENT OF
ORGANIZATION**

Office Use Only

1. NAME OF COMMITTEE (in full) (Check if name is changed) Example: If typing, type over the lines. 12FE4M5

Honor and Principles PAC

ADDRESS (number and street)

228 S. Washington St.

(Check if address is changed)

Ste. 115

Alexandria

CITY ▲

VA

STATE ▲

22314

ZIP CODE ▲

COMMITTEE'S E-MAIL ADDRESS

(Check if address is changed)

llisker@hdafec.com

Optional Second E-Mail Address

COMMITTEE'S WEB PAGE ADDRESS (URL)

(Check if address is changed)

2. DATE 03 / 26 / 2018

3. FEC IDENTIFICATION NUMBER C C00674291

4. IS THIS STATEMENT * NEW (N) OR AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Lisker, Lisa, , ,

Signature of Treasurer Lisker, Lisa, , , [Electronically Filed] Date 03 / 26 / 2018

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office Use Only

For further information contact Federal Election Commission Toll Free 800-424-9530 Local 202-694-1100

FEC FORM 1
(Revised 06/2012)

5.o TYPE OF COMMITTEEo

Candidate Committee:

- (a) o This committee s a principal campaign committee. (Complete the candidate information below.) o
- (b) o This committee s an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)o

Name of o Candidate o _____

Candidate Party Affiliation o Office o Sought: o House o Senate o President o State District o

- (c) o This committee supports/opposes only one candidate, and is NOT an authorized committee.o

Name of o Candidateo _____

Party Committee:

- (d) o This committee is ao _____ (National, State o or subordinate) committee of the o _____ (Democratic, o Republican, etc.) Party. o

Political Action Committee (PAC):

- (e) o This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a: o
 - Corporation o Corporation w/o Capital Stock o Labor Organization o
 - Membership Organization o Trade Association o Cooperative o

In addition, this committee is a Lobbyist/Registrant PAC. o

- (f) o This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party o committee. (i.e., nonconnected committee) o

In addition, this committee is a Lobbyist/Registrant PAC. o

In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.) o

Joint Fundraising Representative:

- (g) o This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political o committees/organizations, at least one of which is an authorized committee of a federal candidate. o
- (h) o This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political o committees/organizations, none of which is an authorized committee of a federal candidate. o

Committees Participating in Joint Fundraiser

1. _____ | FEC ID number o C
2. _____ | FEC ID number o C
3. _____ | FEC ID number o C
4. _____ | FEC ID number o C

Write or Type Committee Name

Honor and Principles PAC

6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

NONE

Mailing Address

CITY

STATE

ZIP CODE

Relationship: Connected Organization Affiliated Committee Joint Fundraising Representative Leadership PAC Sponsor

7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name

Lisker, Lisa, , ,

Mailing Address

228 S. Washington St.

Ste. 115

Alexandria

VA

22314

Title or Position

CITY

STATE

ZIP CODE

Treasurer

Telephone number

703

549

7705

8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name of Treasurer

Lisker, Lisa, , ,

Mailing Address

228 S. Washington St.

Ste. 115

Alexandria

VA

22314

Title or Position Treasurer

CITY

STATE

ZIP CODE

Telephone number

703

549

7705

Full Name of Designated Agent

[Grid for Full Name of Designated Agent]

Mailing Address

[Grid for Mailing Address Line 1]

[Grid for Mailing Address Line 2]

[Grid for Mailing Address Line 3]

CITY

STATE

ZIP CODE

Title or Position

[Grid for Title or Position]

Telephone number

[Grid for Telephone number]

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

BB&T [Grid for Name of Bank]

Mailing Address

1909 K St., NW [Grid for Mailing Address Line 1]

[Grid for Mailing Address Line 2]

Washington DC 20006 [Grid for Mailing Address Line 3]

CITY

STATE

ZIP CODE

Name of Bank, Depository, etc.

[Grid for Name of Bank]

Mailing Address

[Grid for Mailing Address Line 1]

[Grid for Mailing Address Line 2]

[Grid for Mailing Address Line 3]

CITY

STATE

ZIP CODE

EC MISCELLANEOUS TEXT RELATED TO A REPORT, SCHEDULE OR ITEMIZATION

Form/Schedule: 1
Transaction D:

This committee intends to make independent expenditures, and consistent with the U.S. Court of Appeals for the District of Columbia Circuit decision in *SpeechNow v. FEC*, it therefore intends to raise funds in unlimited amounts. This committee will not use those funds to make contributions, whether direct, in-kind, or via coordinated communications, to federal candidates or committees.

orm/Schedule:
Transaction D:

EXHIBIT C

FEC FORM 3X

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) **HONOR AND PRINCIPLES PAC** TYPE OR PRINT ▼ Example: If typing, type over the lines. **12FE4M5**

ADDRESS (number and street) **228 S. WASHINGTON ST.**
STE. 115
 Check if different than previously reported. (ACC) **ALEXANDRIA** **VA** **22314**

2. FEC IDENTIFICATION NUMBER ▼ CITY ▲ STATE ▲ ZIP CODE ▲

C C00674291 3. IS THIS REPORT NEW (N) OR AMENDED (A)

4. TYPE OF REPORT (Choose One)
- (a) Quarterly Reports:
- April 15 Quarterly Report (Q1)
 - July 15 Quarterly Report (Q2)
 - October 15 Quarterly Report (Q3)
 - January 31 Year-End Report (YE)
 - July 31 Mid-Year Report (Non-election Year Only) (MY)
 - Termination Report (TER)

(b) Monthly Report Due On:

Feb 20 (M2)	May 20 (M5)	Aug 20 (M8)	Nov 20 (M11) (Non-Election Year Only)
Mar 20 (M3)	Jun 20 (M6)	Sep 20 (M9)	Dec 20 (M12) (Non-Election Year Only)
Apr 20 (M4)	Jul 20 (M7)	Oct 20 (M10)	Jan 31 (YE)

(c) 12-Day PRE-Election Report for the: Primary (12P) General (12G) Runoff (12R) Convention (12C) Special (12S)

Election on **MM/DD/YYYY** in the State of

(d) 30-Day POST-Election Report for the: General (30G) Runoff (30R) Special (30S)

Election on **MM/DD/YYYY** in the State of

5. Covering Period **01 01 2018** through **03 31 2018**

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.
 Type or Print Name of Treasurer **Lisker, Lisa, . .**

Signature of Treasurer **Lisker, Lisa, . .** [Electronically Filed] Date **04 15 2018**

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form BX (Rev. 05/2016) 0

Page 2 0

Write or Type Committee Name

HONOR AND RINCIPLES AC

Report Covering the Period: From: To:

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6.0 a) 0 Cash on Hand January 0, 0 <input type="text" value="2008"/>		<input type="text" value="0.00"/>
(b) 0 Cash on Hand at Beginning of Reporting Period.....	<input type="text" value="0.00"/>	
(c) 0 Total Receipts (from Line 6) 0.....	<input type="text" value="175000.00"/>	<input type="text" value="175000.00 0"/>
(d) Subtotal (add Lines 6b) 0 and 0 6(c) for Column A and Lines 0 6(a) and 6(c) for Column B) ..0.....	<input type="text" value="175000.00"/>	<input type="text" value="175000.00 0"/>
7.0 Total Disbursements (from Line).....	<input type="text" value="163838.00 0"/>	<input type="text" value="163838.00 0"/>
8.0 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6d)) ...0.....	<input type="text" value="11162.00"/>	<input type="text" value="11162.00"/>
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) 0.....	<input type="text" value="0.00"/>	
10.0 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) 0.....	<input type="text" value="0.00"/>	

This committee has qualified as a multicandidate committee. (see FEC FORM M)

For further information contact:

Federal Election Commission
999 E Street, N
Washington, DC 0463

Toll Free 800-424-9530
Local 202-694-1100

DETAILED SUMMARY PA
of Receipts

FEC Form **3X** (Rev. 05/2016) 0

Page **3** 0

Write or Type Committee Name

HONOR AND PRINCIPLES PAC

Report Covering the Period: From: **01** / **01** / **2018** 0

To: **03** / **31** / **2018** 0

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A) 0.....	175000.00 0	175000.00 0
(ii) Unitemized	0.00	0.00 0
(iii) TOTAL (add 0 Lines 11(a)(i) a0d (ii)0.....	175000.00	175000.00 0
(b) Political Party Committees	0.00	0.00 0
(c) Other Political Committees (such as PACs) 0.....0.....	0.00 0	0.00 0
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5) ..0.....	175000.00 0	175000.00 0
12.0 Transfers From Affiliated/Other Party Committees.....	0.00	0.00 0
13.0 All Loans Received.....	0.00 0	0.00 0
14.0 Loan Repayments Received.....	0.00 0	0.00 0
15.0 Offsets To Operating Expenditures (Refunds, Rebates, etc.) 0 (Carry Totals to Line 37, page 5) ...0.....	0.00 0	0.00 0
16.0 Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0.00	0.00 0
17.0 Other Federal Receipts (Dividends, Interest, etc.).....	0.00 0	0.00 0
18.0 Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account 0 (from Schedule H3) 0.....	0.00	.00
(b) Levin Funds (from Schedule H5) 0..... 0	0.00 0	0.00 0
(0) Total Transfers (add 18(a) and 18(b)) ..0	0.00 0	0.00 0
19.0 Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c)) 0..... ▶ 0	175000.00 0	175000.00 0
20. Total Federal Receipts (subtract Line 18(0) from Line 19) 0..... ▶ 0	175000.00 0	175000.00 0

DETAILED SUMMARY AGE

00 Disbursements 0

FEC Form 3X (Rev. 05/2016) 0

Page 4 0

Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4) 0		
(i) Federal Share 0.....	0.00	0.00
(ii) Non-Federal Share 0.....	0.00 0	0.00 0
(b) Other Federal Operating Expenditures 0.....	.00	0.00 0
(c) Total Operating Expenditures (add 21(a)(i), 0a(ii), and (b)) ▶ 0	0.00 0	0.00 0
22.0 Transfers to Affiliated/Other Party Committees 0.....	0.00 0	0.00 0
23. Contributions to Federal Candidates/Committees and Other Political Committees 0.....	0.00 0	0.00 0
24. Independent Expenditures (use Schedule E) 0.....	0.00	0.00
25.0 Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F)..... 0.....	0.00	0.00
26. Loan Repayments Made 0.....	0.00 0	0.00
27. Loans Made 0.....	0.00 0	0.00 0
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees ... 0.....	0.00 0	0.00 0
(b) Political Party Committees 0.....	0.00 0	0.00 0
(c) Other Political Committees (such as PACs)..... 0.....	0.00 0	0.00 0
(d) Total Contribution Refunds (add Lines 28(a), 0b, and 0c)..... ▶ 0	0.00 0	0.00 0
29. Other Disbursements (Including Non-Federal Donations).....	163838.00 0	163838.00 0
30.0 Federal Election Activity (52 U.S.C. § 30101(20)) 0		
(a) Allocated Federal Election Activity (from Schedule H6) 0		
(i) Federal Share 0.....	0.00	0.00 0
(ii) "Levin" Share.....	0.00 0	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds 0.....	0.00 0	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 0(b)) ▶ 0	0.00 0	0.00 0
31.0 Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 00c) ... 0	163838.00 0	163838.00 0
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31) 0..... ▶ 0	163838.00 0	163838.00 0

DETAILED SUMMARY AGE
of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 5

III. Net Contributions/ Operating expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3)	175000.00	175000.00
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	175000.00	175000.00
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))	0.00	0.00
37. Offsets to Operating expenditures (from Line 15, page 3)	0.00	0.00
38. Net Operating expenditures (subtract Line 37 from Line 36)	0.00	0.00

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page.

FOR LINE NUMBER: PAGE 6 OF 7
(check only one)

<input checked="" type="checkbox"/> 11a.	<input type="checkbox"/> 11b.	<input type="checkbox"/> 11c.	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14.	<input type="checkbox"/> 15.	<input type="checkbox"/> 16 <input type="checkbox"/> 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)
HONOR AND PRINCIPLES PAC

A. Full Name of Individual (Last, First, Middle Initial) or Full Organization Name
LZP, LLC

Mailing Address: 10 West Broad St.

City: Columbus State: OH Zip Code: 43215

FEC ID number of contributing federal political committee: **C**

Name of Employer (for Individual): Occupation (for Individual):

Receipt For:
 Primary General
 Other (specify):

Aggregate Year-to-Date: 175000.00

Date of Receipt: 03 / 28 / 2018

Transaction ID: SA11AI.4102

Amount of Each Receipt this Period: 175000.00

Memo Item: Contribution

B. Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

Mailing Address:

City: State: Zip Code:

FEC ID number of contributing federal political committee: **C**

Name of Employer (for Individual): Occupation (for Individual):

Receipt For:
 Primary General
 Other (specify):

Aggregate Year-to-Date:

Date of Receipt:

Amount of Each Receipt this Period:

Memo Item:

C. Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

Mailing Address:

City: State: Zip Code:

FEC ID number of contributing federal political committee: **C**

Name of Employer (for Individual): Occupation (for Individual):

Receipt For:
 Primary General
 Other (specify):

Aggregate Year-to-Date:

Date of Receipt:

Amount of Each Receipt this Period:

Memo Item:

SUBTOTAL of Receipts This Page (optional).....	175000.00
TOTAL This Period (last page this line number only).....	175000.00

