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October 29, 2018

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Federal Election Commission  
1050 First Street NE  
Washington, DC 20463  
VIA EMAIL: [CELA@fec.gov](mailto:CELA@fec.gov)**Re: MUR 7464; Response to Complaint from Honor and Principles PAC**

Dear Mr. Jordan:

We are writing this letter on behalf of Honor and Principles PAC (“HPP”), and Lisa Lisker, in her official capacity as Treasurer, in response to the Complaint filed in the above-referenced matter by Citizens for Responsibility and Ethics in Washington (“CREW”), a liberal activist group masquerading as a non-partisan watchdog. The Complaint is just the latest edition in a long line of frivolous, politically-charged complaints filed by CREW. The Complaint offers nothing more than the same unsupported and hyperbolic allegations and innuendo that have riddled CREW’s complaints since its inception—virtually all against conservative organizations. It should be promptly dismissed.

The Federal Election Commission (the “Commission”) may find “reason to believe” only if a Complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the Federal Election Campaign Act (the “Act”). *See* 11 C.F.R. § 111.4(a), (d). Unwarranted legal conclusions from asserted facts or mere speculation will not be accepted as true. *See* MUR 4960, Commissioners Mason, Sandstrom, Smith and Thomas, Statement of Reasons (Dec. 21, 2001). Moreover, the Commission will dismiss a complaint when the allegations are refuted with sufficiently compelling evidence. *See id.*

CREW’s allegations against HPP are limited to a single speculative claim, in which CREW asserts that HPP 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 if LZP.” Compl. at ¶22. CREW fails to provide a single piece of evidence to support this allegation. In fact, it does not include any information whatsoever—either from public resources or personal knowledge—that would inform its unreasonable belief

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that HPP violated any provision of the Act. Instead, CREW relies solely on its own speculation about HPP's fundraising activities in an attempt to conjure up a claim against HPP.

HPP has and continues to fully comply with its requirements under the Act. Courts have consistently concluded that independent expenditure-only committees (i.e. "Super PACs") are permitted to accept contributions from individuals, corporations, labor unions, associations, and other business entities, including LLCs. *See SpeechNow.org v. FEC*, 599 F.3d 686 (D.C. Cir. 2010); *see also Citizens United v. FEC*, 558 U.S. 310 (2010).

HPP has safeguards and controls in place to monitor its contributions and timely file complete and accurate reports in accordance with the Act. HPP's donor form clearly states that "federal law requires us to use our best efforts to collect and report the name, mailing address, occupation and name of employer of individuals whose contributions exceed \$200 in a calendar year," in accordance with the Commission's regulations. *See* 11 C.F.R. §§ 104.3(a)(4); 104.7. In an abundance of caution, the form also requires the donor's assurances that "the contribution, whether personal or corporate, will not be reimbursed by another person or entity." Such safeguards go above and beyond the requirements of the Act and the Commission's regulations.

In this case, HPP received a contribution from LZP, LLC. There was nothing suspicious on the face of the contribution, and the contribution was deposited and reported in full compliance with the Act. HPP was not under any further obligations with respect to the contribution.

In presenting such a hollow argument, CREW identifies "no source of information that reasonably gives rise to a belief in the truth of the allegations presented." *See* MUR 4960, Commissioners Mason, Sandstrom, Smith and Thomas, Statement of Reasons (Dec. 21, 2001). CREW's partisan tactics have no place before the Commission, and the Complaint should be summarily dismissed.

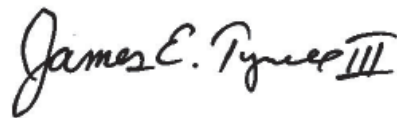
In presenting politically-motivated and factually and legally unsubstantiated arguments, CREW has failed to demonstrate that HPP has violated any provision of the Act or the Commission's regulations. Instead, CREW has yet again invoked an administrative process as a means to continue its assault on its political opponents. The Complaint is based on malicious speculation and innuendo. We therefore respectfully request that the Commission recognize the legal and factual insufficiency of the Complaint on its face and immediately dismiss it.

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Thank you for your consideration of this matter, and please do not hesitate to contact me directly at (202) 344-4522 with any questions.

Respectfully submitted,

A handwritten signature in black ink that reads "James E. Tyrrell III". The signature is written in a cursive style with a large, prominent "J" and "T".

James E. Tyrrell III  
*Counsel to Honor and Principles PAC,  
and Lisa Lisker as Treasurer*