



FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20463

**BY CERTIFIED MAIL & EMAIL**  
**RETURN RECEIPT REQUESTED**

James E. Tyrrell III  
Venable LLP  
600 Massachusetts Ave., NW  
Washington, DC 20001  
[jetyrrell@venable.com](mailto:jetyrrell@venable.com)

March 18, 2022

RE: MUR 7464  
Independence and Freedom  
Network, Inc.  
IFN, LLC

Dear Mr. Tyrrell:

On June 10, 2021, your clients, Independence and Freedom Network, Inc. (“IFN”), and LZP, LLC, were notified that the Federal Election Commission had found reason to believe that IFN and LZP violated 52 U.S.C. § 30122, a provision of the Federal Election Campaign Act of 1971, as amended.

On July 22 and November 24, 2021, IFN and LZP provided incomplete responses to the Commission’s informal questions and requests for relevant documents. As explained in earlier telephone conversations with and correspondence from this Office, your clients failed to include relevant information regarding the source of the funds that were transferred from unknown persons to IFN, and then to LZP, prior to being contributed to a federal political committee called Honor and Principles PAC.

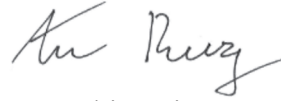
On August, 26, 2021, IFN and LZP also requested, without providing further information being sought by the investigation, that the Commission enter into pre-probable cause conciliation in this matter. On March 8, 2022, the Commission considered your request, and due to the incomplete state of the current record, voted to reject IFN and LZP’s request to enter into pre-probable cause conciliation at this time.

Pursuant to its investigation of this matter, the Commission has issued the attached subpoena and order requiring IFN to provide information that will assist the Commission in carrying out its statutory duty of supervising compliance with the Act. It is required that your client submit all answers to questions under oath within 30 days of your receipt of this subpoena and order.

If you have any questions, please contact me at [arabinowitz@fec.gov](mailto:arabinowitz@fec.gov) or (202) 694-1476.

MUR 7464 (Independence and Freedom Network)  
Letter to James E. Tyrrell III  
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Sincerely,

A handwritten signature in cursive script, appearing to read "Aaron Rabinowitz".

Aaron Rabinowitz  
Attorney

Enclosure  
Subpoena and Order

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of )  
 )  
Independence and Freedom Network, Inc. ) MUR 7464  
 )

**SUBPOENA TO PRODUCE DOCUMENTS AND  
ORDER TO SUBMIT WRITTEN ANSWERS**

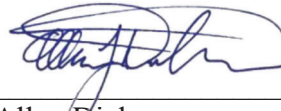
TO: Independence and Freedom Network, Inc.  
c/o James E. Tyrrell III  
Venable LLP  
600 Massachusetts Ave., NW  
Washington, D.C. 20001  
[jetyrrell@venable.com](mailto:jetyrrell@venable.com)

Pursuant to 52 U.S.C. § 30107(a)(1) and (3) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested in the attachment to this Subpoena.

Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 1050 First Street, N.E., Washington, D.C., 20463, and by email to [mshonkwiler@fec.gov](mailto:mshonkwiler@fec.gov) and [arabinowitz@fec.gov](mailto:arabinowitz@fec.gov), along with the requested documents within 30 days of receipt of this Subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

WHEREFORE, the Chair of the Federal Election Commission has hereunto set his hand in Washington, D.C., on this 18th day of March, 2022.

On behalf of the Commission,



Allen Dickerson  
Chair

ATTEST:

Laura e Sinram

Digitally signed by Laura e  
Sinram  
Date: 2022.03.18 13:11:58  
-04'00'

Laura E. Sinram  
Acting Secretary and Clerk of the Commission

- Attachments
- Instructions and Definitions
  - Questions and Document Requests

### **INSTRUCTIONS**

1. In answering these written questions and requests for production of documents, furnish all documents and other information, however obtained, including hearsay, that are in your possession, known by or otherwise available to you, including documents and information appearing in your records.
2. Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.
3. The response to each question propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary, or other input, and those who assisted in drafting the written response.
4. If you cannot answer the following questions in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.
5. Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by the following questions and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.
6. Mark each page with identification and consecutive document control numbers (*i.e.*, Bates numbers).
7. Unless otherwise specified, these requests shall refer to the time period from March 1, 2018 through October 31, 2018.
8. The following questions and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which, and the manner in which, such further or different information came to your attention.
9. All responses must be submitted under oath or affirmation under penalty of perjury, including any response that you have no responsive documents.

## DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

1. “You” shall mean Independence and Freedom Network, Inc., and any employees, agents, and other individuals acting for or on behalf of Independence and Freedom Network, Inc. and including your disregarded entity, LZP, LLC, and any employees, agents, and other individuals acting for or on behalf of LZP, LLC.
2. “Person” shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization, group, or entity.
3. “Document” shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term “document” includes, but is not limited to, books, letters, electronic mail, social media postings, messages sent via Twitter, instant messages, text messages, contracts, notes, diaries, log books, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, financial records, calendar entries, appointment records, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained. If the document request calls for a document that is maintained on or in a magnetic, optical, or electronic medium (for example, but not limited to, computer hard drive, USB drive, or CD-ROM), provide both “hard” (*i.e.*, paper) and “soft” (*i.e.*, in the magnetic or electronic medium) copies, including drafts, and identify the name (*e.g.*, Microsoft Word for Windows, WordPerfect) and version numbers of the software by which the document(s) will be most easily retrieved.
4. “Identify” with respect to a document shall mean state the nature or type of document (*e.g.*, letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, and the number of pages comprising the document.
5. “Identify” with respect to a person shall mean state the full name, the most recent business and residential addresses and the corresponding telephone numbers, email addresses, the present occupation or position of such person, the occupation or position of such person during the relevant time period, and the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

6. “And” as well as “or” shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for production of documents any documents and materials that may otherwise be construed to be out of their scope.
7. “Communication” shall be deemed to include both singular and plural, and to include written, oral, telephonic, and electronic communications.

### **QUESTIONS AND DOCUMENT REQUESTS**

1. Identify the person that transferred \$200,000 to the Independence and Freedom Network on March 28, 2018.
  - a. Provide the name and contact information, including mail and email addresses and phone numbers, for that person.
  - b. Provide unredacted copies of all documentation and communications relating to that provision of funds; and identify any other provisions of funds, and the date and amount of such provision or provisions, made by that person to the Independence and Freedom Network between March 1, 2018 and November 1, 2018.
2. Identify all financial institutions with which Independence and Freedom Network, Inc., or LZP, LLC, held accounts between March 1 and November 1, 2018.
  - a. Provide all account numbers and the names of the listed accountholders.
3. Identify all persons who were involved in the creation of LZP, LLC.
4. Provide unredacted copies of all ledgers, spreadsheets, financial statements, bank statements, communications, or other documents that reflect disbursements from Independence and Freedom Network, Inc., to LZP, LLC.
5. Provide unredacted copies of all ledgers, spreadsheets, financial statements, bank statements, communications, or other documents that reflect disbursements from LZP, LLC, to Honor and Principles PAC.
6. State whether Independence and Freedom Network, Inc., played a role in the creation of Honor and Principles PAC, identify any agent or agents of Independence and Freedom Network, Inc. so involved, and describe the nature of their involvement.