



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

BY: Charles Kitcher *CK/ms*
Associate General Counsel for Enforcement

Mark Shonkwiler *MS*
Assistant General Counsel

Aaron Rabinowitz *AR*
Attorney

SUBJECT: MUR 7464 (Unknown Respondent)

RE: Notification of Respondent *CK/ms*

On May 20, 2021, the Commission found reason to believe that Unknown Respondents violated 52 U.S.C. § 30122 by making contributions in the name of another.¹ The Office of the General Counsel began an investigation to identify Unknown Respondents.

Based on our investigative findings to date, one of the Unknown Respondents appears to be Ohio Works. Documents and written responses provided in response to the subpoena to Independence and Freedom Network, Inc. (“IFN”) that the Commission approved on March 8, 2022,² have identified Ohio Works as the source of the \$200,000 infusion of funds into IFN on March 28, 2018, that was used to make a contribution from IFN’s disregarded entity, LZP, LLC, to Honor PAC that same day. Those documents and written responses show that Ohio Works also donated the following amounts to IFN during the relevant time period: \$30,000 on March 7, 2018; \$120,000 on April 6, 2018; and \$2,000 on May 7, 2018. LZP, LLC, made the following contributions to Honor PAC: \$175,000 on March 28, 2018, \$50,000

¹ Cert. (May 27, 2021).

² Cert. (Mar. 11, 2022).

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on April 6, 2018; \$10,000 on April 18, 2018; and \$35,000 on October 19, 2018.³ Ohio Works made its \$120,000 donation to IFN earlier in the same day that IFN transferred \$50,000 to LZP to be used to contribute to Honor PAC. And it appears that the total amount donated from Ohio Works to IFN during the relevant period exceeds the total amount LZP contributed to Honor PAC.

As such, consistent with previous Commission practice in complaint-generated matters involving initially unknown respondents, we intend to notify Ohio Works about the allegations made in the Complaint and offer it an opportunity to respond.⁴

³ *E.g.*, Factual & Legal Analysis at 2 (Independence and Freedom Network, *et al.*).

⁴ *See, e.g.*, MUR 7355 (Heller for Senate) MUR 6838 (Aossey); MUR 6642 (Kauffman).