



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 (LZP, LLC, *et al.*)

**RE:** Circulation of Discovery Documents

---

As part of the investigation in the above-referenced matter, we are circulating the attached subpoenas directed to Respondents Raymond McVeigh, and Lisa Lisker in her official capacity as treasurer for Honor and Principles PAC for the Commission's approval on a 48-hour no-objection basis.

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, that Independence and Freedom Network, Inc. ("IFN"), Ray McVeigh, and LZP, LLC violated 52 U.S.C. § 30122 by allowing LZP's name to be used to make contributions in the name of another, and that Honor and Principles PAC and Lisa Lisker in her official capacity as treasurer ("Honor PAC") violated 52 U.S.C. § 30122 by knowingly accepting contributions in the name of another.<sup>1</sup>

---

<sup>1</sup> Certification (May 27, 2021). The Commission also issued reason to believe findings concerning LLC attribution violations: that LZP violated 11 C.F.R. § 110.1(g)(5) by failing to provide attribution information for their contribution of \$35,000 made on October 19, 2018, and reason to believe that Honor PAC violated 52 U.S.C. § 30104(b) and 11 C.F.R. §§ 110.1 (e) and (g)(2) by failing to properly report LLC attribution information for the \$35,000 contribution made on October 19, 2018.

The focus of the investigation has been to determine the source of funds that LZP used to make contributions to Honor PAC. LZP made a total of \$270,000 in contributions to Honor PAC as follows: \$175,000 on March 28, 2018, \$50,000 on April 6, 2018, \$10,000 on April 18, 2018, and \$35,000 on October 19, 2018.<sup>2</sup> At the time of the reason to believe findings there were questions regarding the source of the funds in light of the facts surrounding the contributions. Key events took place within a four-day period, culminating in LZP's first contribution to Honor PAC, that could indicate that an unknown person directed the sequence of events and as a result, directed that contributions be made in the name of another: specifically, Honor PAC registered as an IEOPC with the Commission on March 26, 2018; LZP registered as an LLC in Ohio the next day, on March 27, 2018; LZP made its first contribution in the amount of \$175,000 to Honor PAC on March 28, 2018; and Honor PAC made its first political disbursement on March 29, 2018.<sup>3</sup>

After IFN provided redacted bank information during informal discovery that indicated that \$200,000 was transferred into it immediately before its March 28, 2018, transfer of \$175,000 to LZP, the Commission approved a subpoena directing that IFN provide, among other things, unredacted bank information and the identity of the source that provided the funds transferred on March 28, 2018.<sup>4</sup> This office also recommended that the Commission approve a deposition subpoena to McVeigh at that time, but there were not four votes to approve that subpoena.<sup>5</sup>

In response to the subpoena, IFN provided information indicating that an entity called Ohio Works, LLC, was the source of the funds transferred into IFN on March 28, 2018, and we notified the entity as a Respondent in the matter.<sup>6</sup> Subsequently, we conducted informal discovery with Ohio Works, which confirmed that it was the source of funds into IFN and revealed the identity of sources of funds into Ohio Works that were used to make its transfers into IFN, who were also notified as Respondents.<sup>7</sup> We also conducted informal interviews with principals at Ohio Works.

However, we still have limited information about IFN, LZP, and Honor and Principles PAC's understanding of whether there were specific instructions about the purpose and use of the funds provided from Ohio Works and whether LZP and Honor and Principles PAC were created for the purpose of disguising the true source of the contributions made to Honor and Principles PAC. We are in the process of obtaining informal discovery and responses from the persons who provided funds to Ohio Works and have scheduled an interview with an individual, Joel Riter, who was identified by Ohio Works as an intermediary who represented IFN in discussing the transfer of funds from Ohio Works to IFN. In order to timely conclude our investigation, we also view it as important to interview Raymond McVeigh and a

---

<sup>2</sup> Factual and Legal Analysis at 2, MUR 7464 (IFN).

<sup>3</sup> *Id.* at 1-2.

<sup>4</sup> Cert. ¶ 2 (Mar. 1, 2022).

<sup>5</sup> *Id.* ¶¶ 1, 2.

<sup>6</sup> Memo. to Commission re Notification of Respondent (May 3, 2022).

<sup>7</sup> Memo. to Commission re Notification of Respondent (Aug. 5, 2022).

representative of Honor and Principles PAC to discuss the transaction at issue.

We renewed our request for an informal interview with McVeigh in communications with his counsel starting on September 23, 2022, and continued to communicate with him by email and phone over the next month. Most recently, on October 21, 2022, counsel represented during a telephone call that McVeigh and Honor and Principles PAC were in the process of obtaining new counsel and would respond to our requests the following week. However, as of today, we have not received a response or new Declaration of Counsel forms for either. We have also been unable to identify individuals who worked for or represented Honor and Principles PAC who would have specific knowledge of the subjects described above.

Thus far, Respondents IFN, LZP, Honor and Principles PAC, and McVeigh have each submitted two signed tolling agreements of thirty days each. Therefore, the statute of limitations in this matter does not begin to run until May 2023 as to them.

Given that McVeigh and Honor and Principles PAC have declined our continued efforts to discuss these subjects through informal interviews, we accordingly request that the Commission approve on a 48-hour no-objection basis the attached deposition subpoenas to Raymond McVeigh and Lisa Lisker in her official capacity as treasurer of Honor and Principles PAC.