



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

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

Mark Shonkwiler *MS*
Assistant General Counsel

Aaron Rabinowitz
Attorney *AR*

SUBJECT: MUR 7464 (Unknown Respondent)

RE: Notification of Respondent

On May 20, 2021, the Commission found reason to believe that Unknown Respondents violated 52 U.S.C. § 30122 by making \$270,000 in contributions in the name of another by transferring funds through Independence and Freedom Network, Inc. (“IFN”) and LZP, LLC, to an independent expenditure only political committee, Honors and Principles PAC (“Honor PAC”).¹ The Office of the General Counsel began an investigation to identify the Unknown Respondents.

On March 8, 2022, based on information received from IFN, we notified the Commission that, consistent with previous Commission practice in matters involving initially unknown respondents, we intended to notify Ohio Works, a non-profit corporation that provided funds to IFN, about the allegations made in the Complaint and offer it an opportunity to respond.²

On August 5, 2022, based on information received from Ohio Works, we notified the Commission that we intended to notify three entities and individuals who provided the funds

¹ Cert. (May 27, 2021).

² Memo to Comm’n (May 4, 2022).

that Ohio Works used to make its donations to IFN, and give them a chance to respond.³ One of the entities we notified was American Electric Power (“AEP”).

As we have noted to the Commission in our prior memos, Ohio Works donated \$200,000 to IFN on March 28, 2018, who transferred \$175,000 of that money to LZP, LLC, which was then transferred to Honor PAC on the same day. The information we received from Ohio Works indicated that AEP made a donation of \$150,000 to Ohio Works on March 27, 2018, and that Ohio Works would not have had the funds to donate to IFN absent that infusion of funds.

We recently received a response on behalf of AEP that indicates that the funds that were transferred to Ohio Works came directly from another entity,

According to AEP, is not a subsidiary or related entity of AEP. Instead, it appears that is a 501(c)(4) whose board members primarily comprise AEP officers connected with the company’s public relations and lobbying department and which was wholly funded by donations from AEP.

Based on the information we have received from AEP, and consistent with our prior practices, we intend to notify of the allegations made in the Complaint and offer it an opportunity to respond.

³ Memo to Comm’n (Aug 5, 2022).