



FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

March 1, 2023

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

Charles Kitcher
Associate General Counsel

BY: Mark Shonkwiler *MS*
Assistant General Counsel

Aaron Rabinowitz *AR*
Attorney

SUBJECT: MUR 7464 (LZP, LLC, *et al.*)

RE: Respondents' Request for Documents Under Agency Procedures for Disclosure of Documents and Information in the Enforcement Process

As the Office of General Counsel (“OGC”) alerted the Commission last week,¹ in connection with this matter we are serving respondents Independence and Freedom Network, Inc., LZP, LLC, and Honor and Principles PAC and Lisa Lisker in her official capacity as treasurer (collectively “Respondents”) with probable cause briefs this week. We have received a request from counsel for Respondents requesting “detailed information about all of the interviews and depositions [OGC has] conducted in this matter, which would include Mr. McVeigh’s deposition transcript and any and all contemporaneous notes of other interviews [OGC has] conducted.” While we intend to provide Respondents with copies of the deposition transcript along with the General Counsel’s Brief, we are recommending that the Commission deny, on a 48 hour no objection basis, Respondents’ request for attorney work product in the form of contemporaneous notes of four witness interviews conducted by OGC in this matter.

Further, because the statute of limitations in this matter will begin to run for Respondents on May 28 of this year, there is insufficient time to delay resolution of this request until the next executive session on March 28. Should the Commission require additional time to consider the

¹ Memorandum to Commission (Feb. 24, 2023).

MUR 7464 (LZP, LLC, *et al.*)
Memorandum to the Commission
Page 2

request, we recommend that the Commission require that Respondents sign a tolling agreement for the time necessary to resolve this request. *See* Disclosure Policy § IV(b)(2) (if a respondent submits a written request, the respondent must, if requested to do so by the Commission, sign a tolling agreement for the time necessary to resolve the request).

MUR 7464 (LZP, LLC, *et al.*)
Memorandum to the Commission
Page 3

OGC recommends that the Commission deny Respondents' request.

II. Recommendations

1. Deny Respondents' request for OGC attorney work product in the form of contemporaneous interview notes.