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March 16, 2023

Lisa A. Stevenson
Acting General Counsel
Federal Election Commission
1050 First Street NE
Washington, DC 20463

Re: **MUR 7464**

Dear Ms. Stevenson:

We write on behalf of our clients, Honor and Principles PAC, and Lisa Lisker in her official capacity as Treasurer (“Respondents”), in response to the March 1, 2023 letter from the Office of General Counsel (“OGC”) informing Respondents that OGC is recommending that the Commission find probable cause to believe Respondents violated the Federal Election Campaign Act (the “Act”). Respondents request a hearing pursuant to 72 Fed. Reg. 64919 (Nov. 19, 2007) and 74 Fed. Reg. 5443 (Oct. 28, 2009) for an extended opportunity to contest the allegations and expand upon their arguments in the enclosed Reply.

Respondents expect to address the following important issues raised in the attached Reply to OGC’s Brief, namely: (1) in order to put to light OGC’s misrepresentations and false allegations concerning interviews it conducted that form the basis for its probable cause recommendation; (2) to emphasize that violations of 52 U.S.C. § 30122 require OGC to prove intent, which it has not; (3) to stress that OGC’s conclusions and statements regarding corporate governance issues have no legal significance to its lone probable cause recommendation; and, (4) to underscore that this case amounts to nothing more than a reporting violation that was not a reporting violation at the time of the alleged activity due to lack of Commission guidance.

Please let us know if you have any questions or require more information.

Respectfully submitted,

James E. Tyrrell III
Counsel to Honor and Principles PAC and
Lisa Lisker, as Treasurer

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Honor and Principles PAC) MUR 7464
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)

REPLY TO GENERAL COUNSEL'S BRIEF

Honor and Principles PAC (“Honor PAC”) has reviewed Independence and Freedom Network, Inc. (“IFN”) and LZP, LLC’s (“LZP”) Reply Brief in response to the Office of General Counsel’s Probable Cause Brief in MUR 7464 dated March 16, 2023 and joins in its arguments in all material respects.

We emphasize IFN and LZP’s position that this matter boils down, at most, to a reporting violation that was not a reporting violation at the time. Had the Commission’s reporting guidance with respect to partnership LLC and disregarded entity contributions to Super PACs¹ been applicable at the time of LZP’s contribution to Honor PAC, Honor PAC would have requested and LZP would have provided IFN’s attribution information to Honor PAC to be reported. But as explained in IFN and LZP’s Reply Brief, that was not the Commission’s guidance at the time.

Through this Reply and by adopting the arguments provided in the March 16, 2023 Reply Brief of IFN and LZP, Honor PAC has demonstrated that this matter should be dismissed.

Submitted: March 16, 2023

Respectfully submitted,

James E. Turner III

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¹ Statement of Reasons of Chair Dickerson, Vice Chair Walther, and Commissioners Broussard and Weintraub, MUR 7454 (Blue Magnolia Investments, LLC) (Apr. 15, 2022).