



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

**MEMORANDUM**

April 3, 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:** Proposed Conciliation Agreement for Probable Cause Conciliation

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Attached are proposed conciliation agreements for probable cause conciliation with Independence and Freedom Network, Inc., LZP, LLC, and Honor and Principles PAC and Lisa Lisker in her official capacity as treasurer (“Honor PAC”) (collectively, “Respondents”). The proposed agreements are for the Commission’s consideration along with the Office of General Counsel’s Notice to the Commission Following the Submission of Probable Cause Brief in MUR 7464 (“OGC Notice”). The OGC Notice informs the Commission that this Office intends to proceed with the recommendation that the Commission find probable cause to believe that Respondents violated 52 U.S.C. § 30122 in connection with a series of contributions IFN made to Honor PAC in LZP’s name. Pursuant to the Commission’s March 28, 2023, vote in this matter, this recommendation does not rely on the factual assertions made in the probable cause brief that are based upon any withheld document or informal investigatory activity, to include any unsworn interview.

We recommend that the Commission approve the attached conciliation agreements.

**RECCOMENDATIONS**

1. Approve the attached conciliation agreements.
2. Approve the appropriate letters.

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<sup>1</sup> *E.g.*, MUR 7878 (Crystal Run Health LLP); MUR 7474 (Barletta); MUR 7221 (MEPCO Holdings, LLC).

<sup>2</sup> MUR 6920 (American Conservative Union).