

# STATE OF TENNESSEE



## BUREAU OF ETHICS AND CAMPAIGN FINANCE REGISTRY OF ELECTION FINANCE

404 James Robertson Parkway, Suite 104

Nashville, TN 37243-1360

(615) 741-7959

Fax: (615) 532-8905

[www.tn.gov/tref](http://www.tn.gov/tref)

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EXECUTIVE DIRECTOR  
Bill Young

March 2, 2022

Janet M. Kleinfelter  
Office of the Tennessee Attorney General  
P.O. Box 20207  
Nashville, TN 37202

*Sent electronically to [Janet.kleinfelter@ag.tn.gov](mailto:Janet.kleinfelter@ag.tn.gov)*

RE: Bureau of Ethics and Campaign Finance, Registry of Election Finance, Enforcement of Subpeonas issued to Cade Cothren

Dear General Kleinfelter,

Earlier today, the Registry of Election Finance (“the Registry”) held a special meeting regarding the Faith Family Freedom Fund political campaign committee. At this meeting, the Registry voted to request that the Office of the Tennessee Attorney General commence an enforcement action on behalf of the Registry to enforce two subpoenas issued by the Registry against Cade Cothren relating to this matter pursuant to Tenn. Code Ann. §§ 2-10-109, 2-10-209, 2-10-213(a)(2), and 4-5-311.

The Registry issued the first of these two subpoenas on January 20, 2022, which was subsequently served on Mr. Cothren’s Counsel of Record, Ms. Cynthia Sherwood, on January 26, 2022. The second subpoena was issued on February 9, 2022 and served on Ms. Sherwood on February 10, 2022. Copies of both these documents and proof of service are attached to this letter.

In response to these subpoenas, Counsel for Mr. Cothren submitted a letter outlining her client’s objections to the subpoenas and indicating that Mr. Cothren would not comply with the Registry’s orders. A copy of this letter is attached for your review. Furthermore, Ms. Sherwood has raised a claim of Fifth Amendment privilege as a component of her objections. The Registry is of the opinion that the basis for Ms. Sherwood’s objections are insufficient and that this bare assertion of Fifth Amendment privilege is facially insufficient to excuse Mr. Cothren from his duty

to respond to the subpoenas. For these reasons, the Registry respectfully requests that the Office of the Attorney General take steps to enforce these subpoenas pursuant to the statutes identified above.

Please feel free to contact myself or Executive Director Bill Young at your earliest convenience regarding this matter.

Sincerely,



Lauren Topping  
General Counsel  
Bureau of Ethics and Campaign Finance  
404 James Robertson Pkwy., Suite 104  
Nashville, TN 37243  
[Lauren.Topping@tn.gov](mailto:Lauren.Topping@tn.gov)  
615-741-7959  
615-253-5370