

FILED

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA

CLERK, U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE, FLORIDA

FEDERAL ELECTION COMMISSION
999 E STREET, N.W. WASHINGTON
D.C 20463,

Civ. No. 3:10-CV-1155-G-99 TGC-JRK

Plaintiff

Vs.

SAM KAZRAN, 1531 HARRINGTON
PARK DR., JACKSONVILLE, FL, 32225

Defendant

DEFENDANTS ANSWER TO PLAINTIFFS COMPLAINT

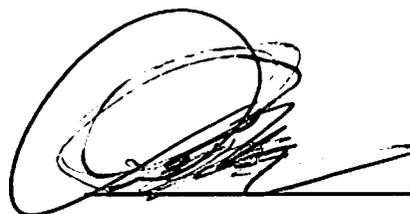
COME NOW: Defendant Sam Kazran hereby files this pleading as his answers to Plaintiffs complaint. Defendant submit to this honorable court that a detail response to Plaintiffs complaint has been drafted and will be filed in the very near future.

1. Admit that 11-2001 LLC d/b/a Hyundai of North Jacksonville (“HNJ”) reimbursed HNJ employees. The Defendant is without knowledge of the Federal Election Commission rules therefore denies all other parts of paragraph.
2. Defendant is without knowledge of the Federal Election Commission rules therefore deny.
3. Defendant agrees and consent to this honorable court’s Jurisdiction.
4. Defendant is without knowledge of the Federal Election Commission rules therefore deny.
5. Admit.
6. Defendant is without knowledge of the Federal Election Commission rules therefore deny.

7. Admit.
8. Admit
9. Defendant is without knowledge of the Federal Election Commission rules therefore deny.
10. Defendant is without knowledge of the Federal Election Commission rules therefore deny.
11. Defendant is without knowledge of the Federal Election Commission rules therefore deny.
12. Defendant is without knowledge of the Federal Election Commission rules therefore deny.
13. Defendant is without knowledge of the Federal Election Commission rules therefore deny.
14. Defendant is without knowledge of the Federal Election Commission rules therefore deny.
15. Admit.
16. Admit.
17. Admit.
18. Expressly Deny that Defendant arranged for employees to contribute to VBCF for congress. Admit that HNJ reimbursed various employees for their contribution to VBFC.
19. Expressly Deny that Defendant arranged for employees to contribute to VBCF for congress. Admit that HNJ reimbursed various employees for their contribution to VBFC.
20. Expressly Deny that Defendant arranged for employees to contribute to VBCF for congress. Admit that HNJ reimbursed various employees for their contribution to VBFC.
21. Admit.
22. Defendant is without knowledge of the Federal Election Commission policy and findings therefore request for proof.
23. Defendant Admit to speaking to FEC but does not agree with the remainder of this paragraph as FECs discussions, and representations are contrary to FEC's current position. Admit that commission invited the Defendants to submit a response. However, expressly deny that the Defendants did not response to FEC's requests.

24. Defendant Admit to speaking to FEC but does not agree with the remainder of this paragraph as FECs discussions are contrary to FEC's current position. (Defendant will provide a more detail answer in separate response).
25. Admit that Defendants did not submit a formal response to general counsel.
26. Defendant is without knowledge of the Federal Election Commission policy and findings therefore request for proof.
27. Defendant Admit to engaging in settlement discussions. Defendant further asserts that the parties at least in general agreed to terms. (Will provide more detail answer in separate response).
28. Defendant is without knowledge of the Federal Election Commission policy and findings therefore request for proof.
29. Defendant is without knowledge of the Federal Election Commission policy and findings therefore request for proof.
30. Defendants incorporate paragraph 1-29 herein by reference.
31. Deny.
32. Expressly deny.
33. Defendants incorporate paragraph 1-32 herein by reference.
34. Defendant is without knowledge of the FEC rules therefore Deny.
35. Defendant is without knowledge of the FEC rules therefore Deny.

Dated this 25th day of April, 2011,

A handwritten signature in black ink, appearing to read 'SAM KAZRAN', written over a horizontal line.

SAM KAZRAN
1531 Harrington Park Dr.
Jacksonville, FL. 32225
(904) 874-0304
Kazran52@aol.com

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by email on April 18, and 25 2011, to Erin Chlopak (Echlopak@fec.gov)

11 APR 25 PM 5:52
CLERK, U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE, FLORIDA



SAM KAZRAN