

OFFICE OF
GENERAL COUNSEL

October 23, 2108

2018 OCT 26 PM 12: 59

Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

MUR # 7526

Fair Political Practices Commission
Enforcement Division
1102 Q Street, Suite 3000
Sacramento, CA 95811
Also sent via email to complaint@fpcc.ca.gov

Irvine City Clerk
One Civic Center Plaza
Irvine, CA 9206

Regarding: Complaint regarding mail received October 23, 2018 with no/improper disclosure

To Whom it May Concern,

On October 23, 2018, I received in my postal mailbox the attached political mail. This particular piece of mail has no disclaimer on it which gives rise to this complaint. It was an 8.5 x 11 inch, glossy card-stock piece of mail.

The mail says that it is sent from "Abraham Ghorbanian, DDS, MS." The return address is "31 Musick, Irvine, CA 92618." This is a corporate address, not a residential address, therefore, the source of the mail is very likely AVIN DENTAL, INC., a California corporation listing Dr. Abraham Ghorbanian as President and Secretary of the Corporation. It is possible that others pooled money to pay for this mail, it is impossible to tell because none of the disclosure requirements were met. It is also possible that the campaigns of Katie Porter, Ed Pope, and Farrah Khan coordinated this mail, but that is also impossible to ascertain with no disclosures.

Potential Federal Law Violations:

1. A corporation may not make a contribution to a campaign for Federal Office. Here, Avin Dental, Inc. MAY HAVE spent corporate money supporting Katie Porter and opposing Mimi Walters in the California 45th District election. See 11 CFR 114.2. See also the attached documentation regarding Avin Dental, Inc.
2. If the funds used to produce this mail were personal funds of Mr. Ghorbanian, they could be considered an in-kind contribution to the Katie Porter campaign and very likely exceed the limits allowed under Federal Election Law (\$2,700).
3. If the mail was intended to be an Independent Expenditure under 11 CFR 100.16, then the mail cannot have been coordinated with the Porter Campaign and the proper Independent Expenditure disclosure and report has not been filed. 11 CFR 100.113

Potential State Law Violations:

1. Regardless of whether personal or corporate funds were used on the mail, it is very likely that the cost is over \$1,000 which would require Ghorbanian and/or Akin Dental, Inc. to file as a Committee and file Forms 462, 461, and 496. A search of the Secretary of State CALACCESS site does not list Avin Dental, Inc. or Ghorbanian as filers.
2. The State mandated disclaimer for political mail was not included depriving voters of the knowledge of the source of this mail.

Potential City of Irvine Violations:

1. Regardless of whether personal or corporate funds were used on the mail, it is very likely that the cost is over \$1,000 which would require Ghorbanian and/or Akin Dental, Inc. to file as a Committee, file Forms 462, 461, and 496. A search of the City of Irvine Clerk's site does not list Avin Dental, Inc. or Ghorbanian as filers. Each of these failures is a separate violation and each has deprived the public of the transparency required by the 24-hour reporting required for expenditures like these.
2. Regardless of whether personal or corporate funds were used on the mail, the Mail MAY BE considered an in-kind contribution to the campaigns of Farrah Khan and Ed Pope and would exceed the limit in the City of Irvine of \$490 (See Municipal Code Section 1-2-4040 through 1-2-405).

This piece of mail is a blatant violation of Federal, State, and City of Irvine Law and should be immediately dealt with by each of your agencies to prevent this person or group of people from doing it again. Furthermore, the enforcement must be significant, otherwise, people in the future will potentially mimic this mail technique and the very purpose of campaign finance law will be undermined.

Sworn under penalty of perjury, ..



Parrisa Yazdani
4790 Irvine Blvd., Suite 105-573
Irvine, CA 92620

Enc: Notary Acknowledgement
Mail received October 23, 2018
Corporate Documents for Akin Dental, Inc.

cc: Dr. Abraham Ghorbanian
31 Musick
Irvine, CA 92618

Katie Porter for Congress
2842 Walnut Avenue
Tustin, CA 92780

Ed Pope for Mayor of Irvine 2018
6102 Sierra Siena Road
Irvine, CA 92603

Farrah N. Khan for Irvine City Council 2018
PO Box 60281
Irvine, CA 92602

001111-11201-01

CALIFORNIA NOTARY ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Orange

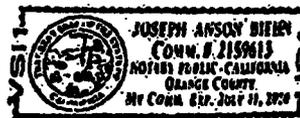
On October 24th 2018 before me, Joseph Anson ^{Notary Public} (name and title of officer),

personally appeared Parrisa Yazdani, who proved to me on the basis of satisfactory evidence to be the person whose name is/are subscribed to the within instrument and acknowledged to me that she/~~she~~/they executed the same in ~~his/her~~ their authorized capacity, and that by ~~his/her~~ their signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature



(Seal)



Dear Neighbor:

This post card contains words from our heart to yours, so please take time and read it. Why did you choose Irvine as the place to call home? Very likely for the same reason we did. My wife and I chose Irvine, because it has high educational ratings, great public schools, and it is one of the safest cities in America. We left our Ocean Front Property in Seattle and moved to Irvine for a better future for our two daughters. In recent years the political landscape places Irvine and all of its splendor and greatness in serious danger.

My Name is Dr. Abraham Ghorbanian, and I am registered to vote as an Independent. This document is not about being a Democrat or Republican or self promotion; no political party has helped me with the cost of this mailer.

We have a Congresswoman "Me Me Walters" representing our district who is an NRA Queen and rubber stamps anything and everything special interests are putting before her. We need to support our police and community by having more sensible gun control. As a fair minded citizen of this Great Nation, I support the 2nd Amendment but also support Universal Back Ground Checks and also the ban on selling weapons to mentally deficient individuals. An eighteen year old cannot buy cigarettes, yet they are at liberty to purchase a weapon. We must raise the legal age for weapon purchase to 21. "Me Me" does not support these propositions!

It is sad to see my daughters fearful because of school mass shootings, and schools preparing them for such events! This is America, not a war torn 3rd world country. Congresswoman, "Me Me Walters" loves Education Secretary Betsy DeVos and her anti public school policies, and has special interests in Charter schools. We need someone who is in academia, caring for public schools. We need a Congresswoman, City Council and School Boards who support our teachers and are committed to making Irvine even better including our diversity. My daughters Aava and Avin, attend an elementary school in modular buildings, right here in Irvine. This is not Rwanda!

Irvine needs to grow sensibly, not the way it is growing in the hands of corrupt politicians and greedy land developers. Our current rate of growth is producing horrible traffic, and there are not enough parks and schools. We love Irvine and do not want to move elsewhere. Whether you have children or not, reside in a gated community or an open residential neighborhood, if Irvine school ratings slump and the crimes rate grows, our city will be less desirable and as a result, our property values will plummet.

There is no greater act of Patriotism when we engage and Vote. Please encourage all your family, friends and neighbors to also participate. My wife and I have studied all the candidates and will not be voting for any particular party. We will be voting for Professor Katie Porter for Congress, Farrah Khan for Irvine City Council and Ed Pope for Mayor. More information about these three candidates on the reverse side.

In Neighborly Friendship,
Abraham Ghorbanian, DDS MS

Back of mail

nc to 3514371

A0741916

**CERTIFICATE of AMENDMENT
of
ARTICLES OF INCORPORATION
of**

FILED
Secretary of State
State of California
MAY 24 2013
1/6

Discount Dental Depot, Inc.

The undersigned certifies that:

1. He is the President and Secretary, respectively, of Discount Dental Depot, Inc.
2. Article I of the Articles of Incorporation is amended to read in its entirety as follows:

The name of this corporation is Avia Dental, Inc.
3. The foregoing Amendment of Articles of Incorporation has been duly approved by the Board of Directors.
4. The corporation has issued no shares.

I declare under penalty of perjury under the laws of the State of California that the matter set forth in this certificate are true and correct of our own knowledge.

Dated: 05/01/13

By: 
Dr. Abraham Ghorbanian,
President and Secretary



**State of California
Secretary of State**

S

Statement of Information
(Domestic Stock and Agricultural Cooperative Corporations)
FEE (Filing and Disclosure): \$25.00.

If this is an amendment, see instructions.

IMPORTANT - READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

FT90740

FILED

In the office of the Secretary of State
of the State of California

JAN-22 2018

1. CORPORATE NAME
AVIN DENTAL, INC.

2. CALIFORNIA CORPORATE NUMBER
C3514371

This Space for Filing Use Only

No Change Statement (Not applicable if agent address of record is a P.O. Box address. See instructions.)

3. If there have been any changes to the information contained in the last Statement of Information filed with the California Secretary of State, or no statement of information has been previously filed, this form must be completed in its entirety.

If there has been no change in any of the information contained in the last Statement of Information filed with the California Secretary of State, check the box and proceed to Item 17.

Complete Addresses for the Following (Do not abbreviate the name of the city. Items 4 and 5 cannot be P.O. Boxes.)

4. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE	CITY	STATE	ZIP CODE
31 MUSICK, IRVINE, CA 92618			
5. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY	CITY	STATE	ZIP CODE
31 MUSICK, IRVINE, CA 92618			
6. MAILING ADDRESS OF CORPORATION, IF DIFFERENT THAN ITEM 4	CITY	STATE	ZIP CODE

Names and Complete Addresses of the Following Officers (The corporation must list these three officers. A comparable title for the specific officer may be added; however, the preprinted titles on this form must not be altered.)

7. CHIEF EXECUTIVE OFFICER/ ABRAHAM GHORBANIAN	ADDRESS 31 MUSICK, IRVINE, CA 92618	CITY	STATE	ZIP CODE
8. SECRETARY ABRAHAM GHORBANIAN	ADDRESS 31 MUSICK, IRVINE, CA 92618	CITY	STATE	ZIP CODE
9. CHIEF FINANCIAL OFFICER/ ABRAHAM GHORBANIAN	ADDRESS 31 MUSICK, IRVINE, CA 92618	CITY	STATE	ZIP CODE

Names and Complete Addresses of All Directors, Including Directors Who are Also Officers (The corporation must have at least one director. Attach additional pages, if necessary.)

10. NAME ABRAHAM GHORBANIAN	ADDRESS 31 MUSICK, IRVINE, CA 92618	CITY	STATE	ZIP CODE
11. NAME	ADDRESS	CITY	STATE	ZIP CODE
12. NAME	ADDRESS	CITY	STATE	ZIP CODE

13. NUMBER OF VACANCIES ON THE BOARD OF DIRECTORS, IF ANY:

Agent for Service of Process If the agent is an individual, the agent must reside in California and Item 15 must be completed with a California street address, a P.O. Box address is not acceptable. If the agent is another corporation, the agent must have on file with the California Secretary of State a certificate pursuant to California Corporations Code section 1505 and Item 15 must be left blank.

14. NAME OF AGENT FOR SERVICE OF PROCESS ABRAHAM GHORBANIAN	ADDRESS	CITY	STATE	ZIP CODE
15. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL	CITY	STATE	ZIP CODE	
31 MUSICK, IRVINE, CA 92618				

Type of Business

16. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION
WHOLESALE DENTAL SUPPLIES

17. BY SUBMITTING THIS STATEMENT OF INFORMATION TO THE CALIFORNIA SECRETARY OF STATE, THE CORPORATION CERTIFIES THE INFORMATION CONTAINED HEREIN, INCLUDING ANY ATTACHMENTS, IS TRUE AND CORRECT.

01/22/2018 ABRAHAM GHORBANIAN CEO

DATE TYPE/PRINT NAME OF PERSON COMPLETING FORM TITLE SIGNATURE

SI-200 (REV.01/2013)

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APPROVED BY SECRETARY OF STATE