

OFFICE OF
GENERAL COUNSELTuesday, November 13, 2018
2018 NOV 20 AM 9:46

To: Members of the Federal Election Commission

From: Abraham Ghorbanian, DDS MS

Dear Federal Election Commissioners:

I am a dentist in California with 20 years of experience serving the community above and beyond being only a practicing dentist.

After receiving a nice post card from a neighbor encouraging the neighborhood to be more patriotic and vote. I then decided I wanted to do the same thing.

I am registered to vote as an Independent. With all of the hate crimes rising, I felt it is my duty to support Katie Porter as she does not receive any contributions from the NRA. I made a post card and sent it to a printer labeled Kristal Graphics. Mr. Munna Mansour is the proprietor and the business address is 22065 Sherman Way, Canoga Park, CA 91303. Their business telephone is 818-342-7822). Mr. Munna Mansour told me he has to run this postcard by the post office and see if it needs any kind of clearance since it is not an advertisement and it is about politics. Once he got the clearance from the post office he printed my letter and then he delivered printed documents to the Post Office for mailing.

The cost of the postcard and the postage has been paid only by my personal funds. **Exhibit A** is a copy of the postcard 8.5 x 11" (Front and Back). **Exhibit B** is a copy of the billing statement from Kristal Graphics. **Exhibit C** is a copy of my personal check paying for the postcard.

No other individual or political party participated in the creation of the mailer. Nor have I received any funding from any entity towards this postcard. No Candidate or Political Party has had any input regarding the content of my postcard.

Before I created the postcard, I did call Kristal Graphics as I first wanted to have a 'ballpark' figure as to the cost of the printing and mailing. I also spoke to a very close friend, Mr. Raymond L. Cordova () and I told him I was considering creating this postcard. Mr. Cordova informed me this would be considered an Independent Expenditure and I could not coordinate or speak to any candidate I would be mentioning in my postcard. I have in fact made that disclaimer in the body of my letter to my neighbors.

I do not know Mr. Ed Pope and Mrs. Katie Porter. I do know Farrah Khan. I acted on the advice of Mr. Cordova and made certain I had no contact with the 3 mentioned individuals or anyone from their campaign committees. No one from my family has made any contributions to these campaigns. I have never attended any rallies or political events of the 3 candidates.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

OFFICE OF
GENERAL COUNSEL

2018 NOV 20 AM 9:46

Dr. Abraham Ghorbanian, CEO
Avin Dental, Inc.
31 Musick
Irvine, CA 92618

NOV 01 2018

RE: MUR 7526

Dear Dr. Ghorbanian:

The Federal Election Commission received a complaint that indicates Avin Dental, Inc. and you in your individual capacity may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 7526. Please refer to this number in all future correspondence.

The Act affords you the opportunity to demonstrate in writing that no action should be taken against Avin Dental, Inc. and you in your individual capacity in this matter. If you wish to file a response, you may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Where appropriate, statements should be submitted under oath by persons with relevant knowledge. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and § 30109(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. Please be advised that, although the Commission cannot disclose information regarding an investigation to the public, it may share information on a confidential basis with other law enforcement agencies.¹

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission. Please note that you have a legal obligation to preserve all documents, records and materials relating to the subject matter of the complaint until such time as you are notified that the Commission has closed its file in this matter. See 18 U.S.C. § 1519.

¹ The Commission has the statutory authority to refer knowing and willful violations of the Act to the Department of Justice for potential criminal prosecution, 52 U.S.C. § 30109(a)(5)(C), and to report information regarding violations of law not within its jurisdiction to appropriate law enforcement authorities. *Id.* § 30107(a)(9).

NOV 01 2018

Any correspondence sent to the Commission, such as a response, must be addressed to one of the following (note, if submitting via email this Office will provide an electronic receipt by email):

Mail

OR

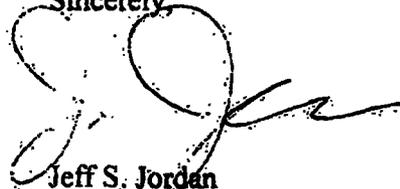
Email

Federal Election Commission
Office of Complaints Examination
and Legal Administration
Attn: Christal Dennis, Paralegal
1050 First Street, NE
Washington, DC 20463

CELA@fec.gov

If you have any questions, please contact Christal Dennis at (202) 694-1650 or toll free at 1-800-424-9530. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Jeff S. Jordan
Assistant General Counsel
Complaints Examination &
Legal Administration



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

Kristal Graphics
 22065 Sherman Way
 Canoga Park, CA 91303
 (818) 342-7822
 tasneem@kristalgraphics.net

Invoice



BILL TO:
 Aava Dental
 31 Musick,
 IRVINE, CA-92618

SHIP TO:
 Abraham Ghorbanian DDS
 Aava Dental
 31 Musick,
 IRVINE, CA-92618

INVOICE #	DATE	TOTAL DUE	DUE DATE	TERMS	ENCLOSED
77259	10/15/2018	\$23,544.00	10/30/2018	Net 15	

P.O. NUMBER
 Dear Neighbor

ACTIVITY	QTY	RATE	AMOUNT
Post Cards Post cards on 14pt UV 4/4 - 8.5 x 11 Residence only	90,000	0.0755556	6,800.00
92603			
92618			
92604			
92614			
92612			
92617			
92637			
Mailing Service Sort & Address/ Bundling Paper	90,000	0.01	900.00
Postage EDDM	90,000	0.17	15,300.00

THANK YOU FOR YOUR BUSINESS!

SUBTOTAL	23,000.00
TAX (8%)	544.00
TOTAL	23,544.00
BALANCE DUE	\$23,544.00

Exhibit (B)

Abraham Ghorbanian
Zahra Sofiani

Irving CA 92603

3980

18-70762250

10/15/2018

PAY TO THE ORDER OF Kristal Graphics \$23,544.00

Twenty Three thousand five hundred forty four 100/100
DOLLARS

CHASE BANK
JPMorgan Chase Bank, N.A

FOR rate mailer

[Signature]

STATION NUMBER

Exhibit (C)

**SCHEDULE 5-E
ITEMIZED INDEPENDENT EXPENDITURES**

PAGE OF
FOR LINE 7 OF FORM 5

NAME OF FILER (In Full)
ABRAHAM GHORBANIAN

Full Name (Last, First, Middle Initial) of Payee GHORBANIAN, ABRAHAM		Date of Public Distribution/Dissemination 10 21 2018
Mailing Address 31 MUSICK		Amount 23,544.00
City IRVINE	State CA	Zip Code 92618
Purpose of Expenditure SUPPORT MY FAVORITE CANDIDATE	Category/Type	Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President State: CA District: 45th
Name of Federal Candidate Supported or Opposed by Expenditure: KATIE PORTER		Check One: <input checked="" type="checkbox"/> Support <input type="checkbox"/> Oppose
Calendar Year-To-Date Per Election for Office Sought		Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)

Full Name (Last, First, Middle Initial) of Payee		Date of Public Distribution/Dissemination
Mailing Address		Amount
City	State	Zip Code
Purpose of Expenditure	Category/Type	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President State: _____ District: _____
Name of Federal Candidate Supported or Opposed by Expenditure:		Check One: <input type="checkbox"/> Support <input type="checkbox"/> Oppose
Calendar Year-To-Date Per Election for Office Sought		Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)

Full Name (Last, First, Middle Initial) of Payee		Date of Public Distribution/Dissemination
Mailing Address		Amount
City	State	Zip Code
Purpose of Expenditure	Category/Type	Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President State: _____ District: _____
Name of Federal Candidate Supported or Opposed by Expenditure:		Check One: <input type="checkbox"/> Support <input type="checkbox"/> Oppose
Calendar Year-To-Date Per Election for Office Sought		Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)

(a) SUBTOTAL of Itemized Independent Expenditures.....	
(b) SUBTOTAL of Unitemized Independent Expenditures.....	
(c) TOTAL Independent Expenditures..... (carry total from last page forward to Line 7)	23,544.00

FEC FORM 5

REPORT OF INDEPENDENT EXPENDITURES MADE AND CONTRIBUTIONS RECEIVED

To Be Used by Persons (Other than Political Committees)

1. (a) Name of Individual, Organization or Corporation ABRAHAM GHORBANIAN	
(b) Address (number and street) <input type="checkbox"/> check if different than previously reported 31 MUSICK	
(c) City, State and ZIP Code IRVINE CA 92618	
2. Occupation and Name of Employer (for Individual Filers Only)	3. FEC Identification Number C

4. TYPE OF REPORT (check appropriate boxes):

- (a) April 15 Quarterly Report
 July 15 Quarterly Report 24-Hour Report
 October 15 Quarterly Report 48-Hour Report
 January 31 Year-End Report

b) Is this Report an amendment? No Yes, it amends the report filed on

5. COVERING PERIOD:

FROM **10 21 2018**

THROUGH **10 27 2018**

6. TOTAL CONTRIBUTIONS.....

7. TOTAL INDEPENDENT EXPENDITURES

23,544.00

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or any political party committee or its agent.

TYPE OR PRINT NAME OF PERSON COMPLETING FORM

SIGNATURE

DATE

ABRAHAM GHORBANIAN



10/31/2018

NOTE: Submission of false, erroneous or incomplete information may subject the person signing this report to the penalties of 52 U.S.C. § 30109.

For further information, contact: Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20483 Toll Free 800-424-9530, Local 202-694-1100

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

10-1000-1-10-10

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

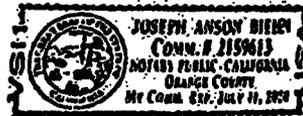
On October 24th 2018 before me, Joseph Anson B ^{Rich, Notary Public} (name and title of officer),

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 [Signature]



(Seal)

00411001101



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



**State of California
Secretary of State**

S

Statement of Information
(Domestic Stock and Agricultural Cooperative Corporations)
FEES (Filing and Disclosure): \$25.00.
If this is an amendment, see instructions.

**FT90740
FILED**

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

IMPORTANT - READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

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.)
 a. 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 6 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/ ADDRESS	CITY	STATE	ZIP CODE
ABRAHAM GHORBANIAN 31 MUSICK, IRVINE, CA 92618			
8. SECRETARY ADDRESS	CITY	STATE	ZIP CODE
ABRAHAM GHORBANIAN 31 MUSICK, IRVINE, CA 92618			
9. CHIEF FINANCIAL OFFICER/ ADDRESS	CITY	STATE	ZIP CODE
ABRAHAM GHORBANIAN 31 MUSICK, IRVINE, CA 92618			

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 ADDRESS	CITY	STATE	ZIP CODE
ABRAHAM GHORBANIAN 31 MUSICK, IRVINE, CA 92618			
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 13 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 13 must be left blank.

14. NAME OF AGENT FOR SERVICE OF PROCESS
ABRAHAM GHORBANIAN

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

Source: California Secretary of State