



# FACT

FOUNDATION FOR  
ACCOUNTABILITY  
AND CIVIC TRUST

October 11, 2018

Ms. Lisa J. Stevenson  
Acting General Counsel  
Office of the General Counsel  
Federal Election Commission  
1050 First Street, NE  
Washington, D.C. 20463

SUPPLEMENT  
MUR '7507

2018 OCT 16 PM 1:55

OFFICE OF  
GENERAL COUNSEL

RE: Additional Information Aftab Pureval and Aftab for Ohio Complaint

Dear Ms. Stevenson,

The Foundation for Accountability and Civic Trust (FACT) filed a complaint dated October 1, 2018, against Aftab Pureval and Aftab for Ohio. The law cannot be any clearer: Pureval can only raise, accept, or spend federal funds for his federal election.<sup>1</sup> In violation of this law, there is significant evidence Pureval used his clerk county campaign fund to pay for his federal congressional campaign, which is detailed in FACT's complaint.

We have enclosed two additional exhibits. One county campaign expenditure that was apparently for his federal campaign was a poll. We have enclosed as Exhibit D a copy of the poll analysis.<sup>2</sup> Additionally, the attempt to hide the polling expenditure demonstrates guilt and we have enclosed as Exhibit E photographs of the un-redacted checks.<sup>3</sup>

<sup>1</sup> 52 U.S.C. § 30116; 11 C.F.R. § 300.63 ("If an individual is simultaneously running for both Federal and State or local office, the individual must raise, accept, and spend only Federal funds for the Federal election.").

<sup>2</sup> The poll was published by the Cincinnati Enquirer. Sharon Coolidge, *Aftab Pureval on Controversial Poll: I'll 'Remedy Any Issues.'*, Cincinnati Enquirer, Sept. 26, 2018 (available at: <https://www.cincinnati.com/story/news/politics/2018/09/26/aftabs-secret-poll-obtained-enquirer/1430234002/>).

<sup>3</sup> The check images were published by the Ohio Star. Anthony Accardi, *Ohio Elections Commission Vote 6-1 to Launch Full Investigation Into Aftab Pureval's Campaign Spending*, The Ohio Star, Sept. 21, 2018 (available at: <http://theohiostar.com/2018/09/21/ohio-elections-commission-votes-6-1-to-launch-full-investigation-into-aftab-purevals-campaign-spending/>).

Complaint re Aftab Pureval

Page 2 of 2

Respectfully submitted,

A handwritten signature in blue ink that reads "Karnold". The signature is written in a cursive, slightly slanted style.

Kendra Arnold  
Executive Director  
Foundation for Accountability & Civic Trust



To: Interested Parties

From: GBA Strategies

Date: January 19, 2018

## Polling in OH-1 Shows Opportunity For Aftab Pureval

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Our recent viability poll in OH-1 suggests this district, like so many others around the country, is up for grabs, particularly with a candidate with a strong foundation and profile like Hamilton County Clerk of Courts Aftab Pureval.<sup>1</sup> The Republican brand is weak, and Chabot's popularity—while initially decent—proves to be soft. Negatives against Chabot, particularly on taxes, health care, and women's equality are particularly persuasive. The race begins in single digits, and after messaging moves to a Pureval lead.

### *Key Findings*

- **The Republican Brand Under Trump Is Weak.** Republican performance here is anemic. Party ID is essentially even (34 percent Democrat, 33 percent Republican, not including leaners), even though Democrats have an 8-point deficit in partisan score. Trump's numbers are poor overall (36 percent favorable, 54 percent unfavorable) and with Independents (35 percent favorable, 51 percent unfavorable).
- **Pureval Can Build On A Strong Foundation.** Pureval begins with a good foundation for someone so recently elected. He is known by a third of the district (33 percent), and has high a favorability at his level of recognition (18 percent favorable, 9 percent unfavorable). He is popular not just with Democrats (23 percent favorable, 8 percent unfavorable) but Independents as well (25 percent favorable, 10 percent unfavorable). His average favorability on a 0-100 scale is higher (57) than Chabot's (52), although Chabot is not surprisingly better-known (90 percent name ID).
- **The Race Begins Very Competitive.** This climate yields a generic ballot test giving Democrats a slight edge (+2), and a named ballot putting Pureval within striking distance (-7). Examining where the named ballot trails the generic ballot the most shows low-hanging fruit to consolidate, particularly among African-Americans who begin +73 in the generic, but +58 in the named ballot.

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<sup>1</sup> GBA Strategies conducted a survey in Ohio's 1<sup>st</sup> congressional district from January 11-16, 2018, with live dialers interviewing 400 likely voters in the November 2018 election by landline and cell phone. The margin of error is +/- 4.9 percentage points at the 95 percent confidence level.

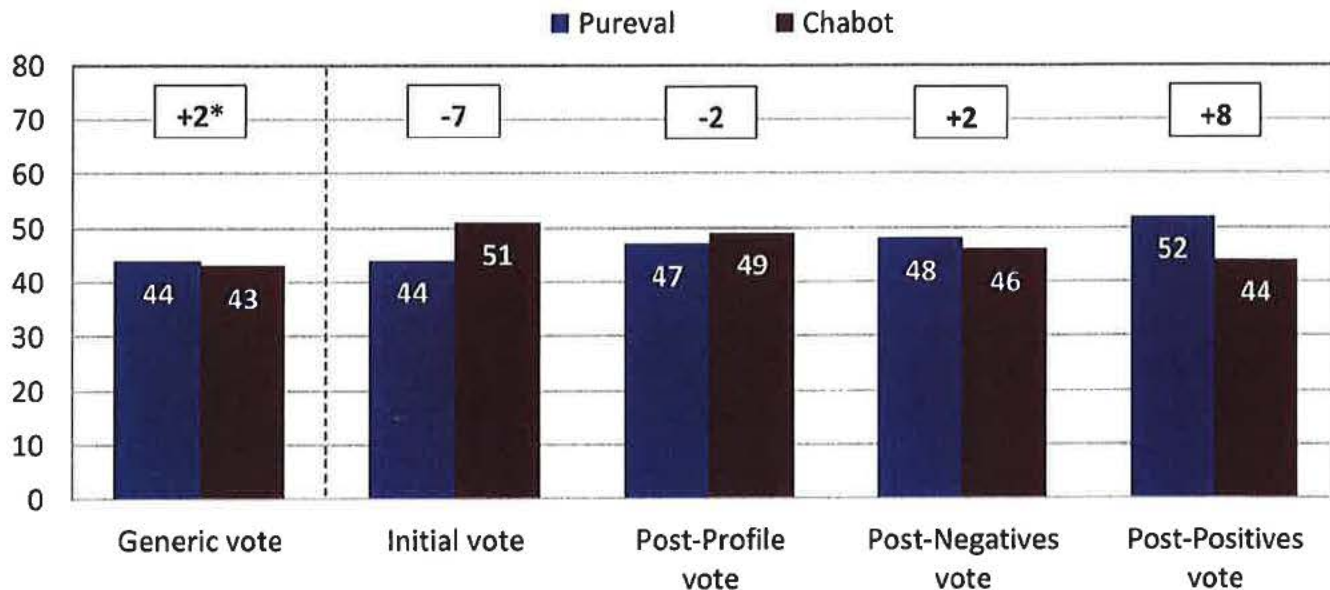
- **There Are Strong Preliminary Contrasts On Taxes, Healthcare, & Women.** The most powerful messages from this initial assessment focus on who is standing up for the middle class. Tying Chabot to Republican cuts to health (34 percent very serious doubts) and to a tax cut that just benefits the rich (32 percent very serious doubts) are particularly strong.

The strongest Pureval positives mirror the Chabot negatives, again showing the resonance of language around a rigged system. Framing Pureval's record around an economy "stacked against the middle class" or fighting for the middle class since "special interests have rigged the game" are particularly effective.

It's also worth noting the strength of woman-specific messaging. A Chabot negative focused on women's health and opportunity is one of the most persuasive overall (31 percent very serious doubts), particularly with Independent women (37 percent). Abortion is likely not a liability; the district is divided on their views on choice (47 percent pro-choice, 45 percent pro-life). Additionally, a woman-centric frame of Pureval's prosecutorial experience is among our most persuasive positives.

- **Chabot's Support Is Soft & Persuadable.** To be clear, Chabot is not unpopular (42 percent favorable, 32 percent unfavorable). But this support is soft. There are more than twice as many voters who shift toward Pureval than shift away from him (18 percent vs. 8 percent), and voters who know both candidates overwhelmingly vote for Pureval (63 percent Pureval, 33 percent Chabot).

At every step of the way—after both candidates' profiles, negative messaging about both candidates, and positive Pureval messaging—Pureval gains ground in the horserace (-7 initial, -2 post-profile, +2 post-negatives, +8 post-positives). Further, the best-testing messages against Chabot are stronger than all the negative messages tested against Pureval. Both introducing Pureval to voters and describing recent Republican egregiousness bring out the district's current swing tendencies.



*\*The vote numbers given in the chart are rounded for purposes of presentation, however the differences are taken from the raw, unrounded numbers for accuracy.*

<b>Aftab Pureval</b> <b>Ohio CD-1</b>
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January 11-16, 2018  
400 Likely Voters

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Q.2 Respondent's gender

	<b>Total</b>
Male.....	48
Female .....	52
(ref:GENDER)	

Q.3 First of all, are you currently registered to vote in Ohio?

	<b>Total</b>
Yes .....	100
No.....	-
(Refused).....	-
(ref:SCREEN1)	

Q.4 I know it's a long way off, but what are the chances of your voting in the general election for Governor, U.S. Senate, U.S. Congress, and other offices in 2018 - are you almost certain to vote, will you probably vote, are the chances fifty-fifty, or don't you think you will vote?

	<b>Total</b>
Almost certain .....	83
Probably .....	16
Fifty-fifty .....	1
Will not vote.....	-
(Don't know/refused).....	1
(ref:SCREEN3)	

Q.5 Thinking about the general election for U.S. Congress in November 2018, if the election were being held today, for whom would you vote - the Democratic candidate or Republican candidate?

	<b>Total</b>
Democratic candidate .....	41
Lean Democratic candidate .....	3
Republican candidate .....	39
Lean Republican candidate .....	4
(Other) .....	3
(Undecided).....	10
<b>Total Democratic candidate .....</b>	<b>44</b>
<b>Total Republican candidate.....</b>	<b>43</b>
<b>Democratic candidate - Republican candidate.....</b>	<b>2</b>
(ref:GENCONG)	

Now, I'd like you to rate your feelings toward some people and companies with one hundred meaning a VERY WARM, FAVORABLE feeling; zero meaning a VERY COLD, UNFAVORABLE feeling; and fifty meaning not particularly warm or cold. You can use any number from zero to one hundred, the higher the number the more favorable your feelings are toward that person or company. If you have no opinion or have never heard of that person or company, please say so.

	<b>Mean</b>	<b>Fav</b>	<b>Unfav</b>	<b>ID</b>
7 Donald Trump .....	39	36	54	98
8 Steve Chabot .....	52	42	32	90
9 Aftab Pureval .....	57	18	9	33
10 Robert Barr.....	37	3	8	16
11 Michele Young .....	43	6	9	26
12 Paul Ryan.....	42	31	43	92
13 Nancy Pelosi.....	36	27	49	89
14 Sherrod Brown .....	49	34	31	84
15 Richard Cordray .....	47	10	13	38
16 Mike DeWine .....	50	33	26	87
17 Procter and Gamble.....	71	66	8	90
(ref:THERM2)				

Q.18 Thinking about the general election for U.S. House of Representative in 2018, if the election were held today and the candidates were Democrat Aftab Pureval and Republican Steve Chabot, for whom would you vote?

	<b>Total</b>
Aftab Pureval.....	40
Lean Aftab Pureval .....	4
Steve Chabot .....	50
Lean Steve Chabot .....	2
(Undecided).....	5
<b>Total Aftab Pureval.....</b>	<b>44</b>
<b>Total Steve Chabot.....</b>	<b>51</b>
<b>Aftab Pureval - Steve Chabot .....</b>	<b>-7</b>
(ref:INITVOTE)	

Q.20 How certain are you that you will vote for (candidate chosen in Q.18) - are you very certain, somewhat certain, or not at all certain?

	<b>Total</b>
Strong Pureval .....	24
Weak Pureval .....	20
Weak Chabot.....	22
Strong Chabot.....	29
(Undecided).....	5
(ref:CERTAIN)	

Q.21 How would you rate the job Steve Chabot is doing as U.S. Congressman - excellent, good, not so good, or poor?

	<b>Total</b>
Excellent .....	13
Good.....	40
Just fair .....	20
Poor .....	17
(Don't know/refused).....	10
<b>Excellent/Good .....</b>	<b>53</b>
<b>Just Fair/Poor .....</b>	<b>37</b>
<b>Excellent/Good - Fair/Poor.....</b>	<b>16</b>
(ref:JOB)	



Q.22 When it comes to abortion, would you say you are pro-choice, meaning you support abortion rights, OR pro-life, meaning you oppose abortion?

	<b>Total</b>
Strongly pro-choice.....	34
Somewhat pro-choice.....	13
Somewhat pro-life.....	9
Strongly pro-life.....	36
(Don't know/refused).....	8
<b>Total Pro-choice.....</b>	<b>47</b>
<b>Total Pro-life.....</b>	<b>45</b>
<b>Pro-choice - Pro-life.....</b>	<b>2</b>
(ref:ABLEG)	

Let me ask you a few questions for statistical purposes.

Q.23 In what year were you born?

	<b>Total</b>
18 - 24.....	7
25 - 29.....	2
30 - 34.....	10
35 - 39.....	7
40 - 44.....	6
45 - 49.....	9
50 - 54.....	6
55 - 59.....	13
60 - 64.....	13
Over 64.....	27
(ref:AGE)	

Q.24 What is the last year of schooling that you have completed?

	<b>Total</b>
1 - 11th grade.....	2
High School graduate.....	23
Non-college post H.S. ....	2
Some college.....	25
College graduate.....	31
Post-graduate school.....	17
(Don't know/refused).....	1
(ref:EDUC)	

Q.25 Generally speaking, do you think of yourself as a Democrat, a Republican or something else?

	<b>Total</b>
Strong Democrat .....	27
Weak Democrat .....	7
Independent-lean Democrat .....	11
Independent .....	8
Independent-lean Republican .....	13
Weak Republican .....	7
Strong Republican .....	26
(ref:PTYID1)	

Q.28 Thinking in political terms, would you say that you are Liberal, Moderate, or Conservative?

	<b>Total</b>
Liberal .....	22
Moderate .....	36
Conservative .....	39
(Don't know/refused) .....	3
(ref:IDEO1)	

Q.29 And what is your race?

	<b>Total</b>
White/Caucasian .....	79
Black/African American .....	15
Hispanic/Latino/Mexican American .....	3
Asian American .....	1
Native American .....	0
(Other) .....	1
(Refused) .....	1
(ref:RACE)	

**[200 Respondents in splits A and B]**

Now, I am going to read you some information about the candidates for U.S. Congress. After I read each statement, please tell me whether it is a very convincing, somewhat convincing, a little convincing, or not at all convincing reason to vote for that candidate for U.S. Congress.

	Very Conv	Smwt Conv	A Little Conv	Not At all Conv	DK/ Ref	Very/ Smwt Conv	Little/ Not Conv
31 (SPLIT A) Aftab Pureval was born and raised in Southwest Ohio, and has served as a federal prosecutor, an attorney at Procter and Gamble, and is now the Hamilton County Clerk of Courts, where he has reformed the office while saving taxpayer dollars. Aftab believes Washington is broken and party politics have created gridlock and dysfunction. Just like he has as Clerk of Courts, Aftab will bring non-partisan reform to Congress. He'll hold regular town hall meetings, work for tough laws to eliminate corruption, and bring fresh, energetic leadership to our district.....	17	50	22	10	1	67	32
32 (SPLIT B) Aftab Pureval was born and raised in Southwest Ohio, and has served as a federal prosecutor, an attorney at Procter and Gamble, and now as the Hamilton County Clerk of Courts, where he has reformed the office while saving taxpayer dollars. Aftab says the rich are getting richer and middle class families are struggling to keep up, all while special interests have rigged the game in Washington. In Congress Aftab will fight to make college more affordable, lower health care and prescription drug costs, and grow wages for everyone.....	25	39	20	15	1	65	34
33 Steve Chabot is a lifelong resident of Western Hills who grew up sweeping floors and pumping gas to get by, and still attends his childhood parish church. In Congress, Steve believes in fiscal responsibility, consistently votes to cut wasteful spending, and earned top ratings from independent taxpayer groups. Steve wants hard-working Americans to keep more of what they earn, and recently he voted to reduce taxes on Ohio families. He has also been an advocate for small businesses and was a leading opponent of Obamacare. Chabot has never forgotten where he came from, or stopped fighting for the people he represents.....	35	27	11	25	1	63	37

(ref:PROFILES)

Q.34 Now that you have heard more information, thinking again about the general election for U.S. Congress in November 2018, if the election were held today and the candidates were Democrat Aftab Pureval and Republican Steve Chabot, for whom would you vote?

	<b>Total</b>	<b>Split A</b>	<b>Split B</b>
Aftab Pureval.....	45	45	45
Lean Aftab Pureval .....	2	2	3
Steve Chabot .....	48	49	47
Lean Steve Chabot .....	1	2	1
(Undecided).....	3	3	3
<b>Total Aftab Pureval.....</b>	<b>47</b>	<b>47</b>	<b>48</b>
<b>Total Steve Chabot.....</b>	<b>49</b>	<b>50</b>	<b>49</b>
<b>Aftab Pureval - Steve Chabot .....</b>	<b>-2</b>	<b>-4</b>	<b>-1</b>
(ref:REVOTE)			

**[200 Respondents in splits A and B]**

Now let me read you some statements about Steve Chabot. This time, please tell me whether each statement raises very serious doubts, serious doubts, minor doubts or no real doubts in your own mind about Steve Chabot.

	<b>Very Ser Dbts</b>	<b>Ser Dbts</b>	<b>Minor Dbts</b>	<b>No Real Dbts</b>	<b>DK/ Ref</b>	<b>Total Ser</b>	<b>Total Not Ser</b>
36 Chabot voted for the Trump healthcare plan, which will take away coverage from half a million Ohioans, raise out-of-pocket costs and premiums for Ohio families, impose an age tax on older people, and weaken protections for those with pre-existing conditions like cancer and diabetes.....	34	26	16	22	2	60	38
37 Chabot voted for the Republican tax plan that benefits the wealthy, corporations, and foreign investors, instead of hard-working Ohioans. In fact, millions of middle class families will see their taxes go up, including people paying off student loans and even seniors, who would have to pay eleven thousand dollars more in taxes. Meanwhile the wealthiest one percent of Americans will receive huge tax breaks, while the middle class pays the cost. ....	32	25	18	22	3	57	40
38 Even after the Wall Street crash, Chabot voted to gut regulations on big banks. He did this after taking millions in political contributions from large corporate finance, insurance and real estate interests - his largest source of campaign money.....	24	28	25	20	2	52	45

	Very Ser Dbts	Ser Dbts	Minor Dbts	No Real Dbts	DK/ Ref	Total Ser	Total Not Ser
39 Chabot doesn't stand up enough for women. He's voted against requiring insurance companies to provide coverage for maternity care and breast cancer coverage. And he has done little to lead the effort to change the way Congress handles sexual harassment cases. ....	31	27	19	23	1	58	41
40 (SPLIT A) These days Republicans in Congress are more interested in scoring political points than in getting things done. Chabot has done nothing to help end the partisan bickering that is tearing our country apart. We need to turn the page on Washington dysfunction and elect new fresh faces to represent us. ....	17	31	21	28	3	48	49
41 (SPLIT B) Chabot votes in lock-step with Donald Trump ninety-five percent of the time and refuses to hold him accountable. These days we don't need more party politics as usual. We need someone who is independent, and able to stand up to Trump if it's right for the people they represent. ....	32	21	17	27	2	53	45
42 Chabot is a career politician who has changed since he was first elected over twenty years ago. He broke his own promise to abide by term limits. He's voted to raise his own pay. He's taken forty travel junkets to countries all over the world, all paid for by special interests. Chabot now refuses to hold town meetings to meet voters in person. Chabot has simply been in Washington too long. ....	20	34	23	19	3	54	42
43 Chabot funneled one hundred fifty-thousand dollars to his son-in-law's company just to build a website, despite the fact that his son-in-law has almost no experience building campaign websites (and he has no other campaign clients). Chabot is using his position to enrich his own family. Even USA Today said it "smacks of nepotism". .... (ref:SCDBTS)	26	29	25	18	2	56	42

Now let me read you some statements about Aftab Pureval. This time, please tell me whether each statement raises very serious doubts, serious doubts, minor doubts or no real doubts in your own mind about Aftab Pureval.

	Very Ser Dbts	Ser Dbts	Minor Dbts	No Real Dbts	DK/ Ref	Total Ser	Total Not Ser
44 Pureval is just another big government liberal, the handpicked candidate of Nancy Pelosi and liberal Democrats in Washington. They know they can count on him to be another vote for higher taxes, wasteful government handouts, and burdensome regulations that hurt small businesses and the economy. ....	25	23	20	29	3	48	49
45 Pureval is an ambitious opportunist. He is just thirty-five years old, and was elected to his first office in 2016. He's not originally from Cincinnati and just moved to the district to run for Congress. He needs to finish the job he was elected to before trying to move on. ....	15	24	27	32	2	39	59
46 Pureval does not share our values. He supported Hillary Clinton for President, and shares her far left social agenda. He supports sanctuary cities, abortion on demand, and weakening our 2nd Amendment gun rights.....	29	19	14	35	3	48	49
47 Under Pureval's watch, one of his employees at the Clerk of Courts took confidential police information and illegally distributed it to the targets of a drug gang investigation. If we can't trust Pureval to prevent criminal activity in his own office, we can't trust him to represent us in Congress. ....	21	25	26	24	4	46	50
48 Pureval is soft on terrorism, immigration, and national security. He wants to allow immigrants to come to the US from known terrorist countries and opposes getting tougher on illegal immigration from Mexico. Pureval even supports sanctuary cities that would protect known criminals from deportation. .... (ref:APDBTS)	29	25	18	26	3	53	44

Q.49 Now let me ask again, if the election for U.S. Congress were held today and the candidates were Democrat Aftab Pureval and Republican Steve Chabot, for whom would you vote?

	<b>Total</b>
Aftab Pureval.....	45
Lean Aftab Pureval .....	3
Steve Chabot .....	42
Lean Steve Chabot .....	4
(Undecided).....	5
 <b>Total Aftab Pureval.....</b>	<b>48</b>
<b>Total Steve Chabot.....</b>	<b>46</b>
 <b>Aftab Pureval - Steve Chabot .....</b>	<b>2</b>
(ref:NEGVOTE)	

**[200 Respondents in splits A and B]**

Now let me read you some more statements about Aftab Pureval. After I read each one, please tell me if it is a very convincing, somewhat convincing, a little convincing, or not at all convincing reason to vote for Aftab Pureval for Congress.

	A	Not	Very/ Little/				
	Very	Smwt	Little	At all	DK/	Very/ Little/	
	Conv	Conv	Conv	Conv	Ref	Conv	Conv
51 Aftab is a reformer who gets things done. As Clerk of Courts, he fired people with do-nothing patronage jobs who were hired just because of who they know. He kept his promise to professionalize the office, hired new qualified professionals, and updated the office's technology so people can pay tickets online. Aftab's efforts have saved taxpayers almost a million dollars and won praise from Republican judges. ....	26	33	17	21	3	59	38
52 (SPLIT A) Aftab is a pro-business Democrat who says treating workers well can be good for the bottom line, just like he learned at Procter & Gamble. As head of the Hamilton County Courts, Aftab, created six weeks of parental leave and made sure all his employees were getting a living wage. He did all this while still saving taxpayers almost a million dollars. ....	35	33	16	16	1	68	31

	Very Conv	Smwt Conv	A Little Conv	Not At all Conv	DK/ Ref	Very/ Little/ Smwt Conv	Not Conv
53 (SPLIT B) Aftab believes that our economy is stacked against the middle-class and too many people are working harder just to stay in place. As head of the Hamilton County Courts, Aftab, created six weeks of parental leave and made sure all his employees were getting a living wage. In Congress, Aftab will fight to end unfair trade deals, increase the minimum wage, and support equal pay for women. ....	39	22	12	25	3	61	36
54 (SPLIT A) Aftab has a record of being tough on crime. As a law student and then a lawyer he provided legal aid to survivors of domestic violence. As a federal prosecutor he locked up sexual predators and criminals who preyed on children. As Clerk of Courts, Aftab started a comprehensive sexual harassment policy to protect women in the workplace. ....	32	37	12	18	1	69	30
55 (SPLIT B) Aftab stands up for women and families. As a law student and then a lawyer he provided legal aid to survivors of domestic violence. As a federal prosecutor he locked up sexual predators and criminals who preyed on children. As Clerk of Courts, Aftab started paid family leave and a comprehensive sexual harassment policy to protect women in the workplace. .... (ref:CONVINC)	36	30	12	20	2	66	32

Q.56 Now let me ask one last time, if the election for U.S. Congress were held today and the candidates were Democrat Aftab Pureval and Republican Steve Chabot, for whom would you vote?

	Total
Aftab Pureval.....	50
Lean Aftab Pureval .....	2
Steve Chabot .....	42
Lean Steve Chabot .....	2
(Undecided).....	4
<b>Total Aftab Pureval.....</b>	<b>52</b>
<b>Total Steve Chabot.....</b>	<b>44</b>
<b>Aftab Pureval - Steve Chabot .....</b>	<b>8</b>
(ref:FINVOTE)	



# Aftab Pureval on controversial poll: I'll 'remedy any issues.'

Sharon Coolidge Updated 9:51 p.m. ET Sept. 26, 2018

Here's what you need to know about Steve Chabot and Aftab Pureval in 30 seconds Wochit

The Enquirer has obtained the poll at the center of a campaign finance spending complaint against Hamilton County Clerk of Courts Aftab Pureval – and it's unquestionably a poll about his current congressional race.

The poll itself – which until now has been held secret by the Pureval campaign – undermines repeated claims by them that it was for both a future clerk of courts run and an exploration of a congressional run. The poll is headlined, "Polling in OH-1 shows opportunity for Aftab Pureval."

And there's not one question about the 2020 clerk of court's race.

That's a problem because if the poll was for both races, the spending would be permissible under Ohio campaign finance laws. But spending from a clerk of courts campaign fund solely for the purpose of a congressional run would be a violation of those laws.

The spending must be kept separate because in the federal race, donations are capped at \$5,400. In the county race, there are no donation limits.

Pureval issued a statement Wednesday saying he conducted the poll to "test the waters" to determine whether to run for Congress or stay on as clerk of courts.

"After reviewing FEC guidance and regulations, we determined that to follow

both the letter and spirit of the law, we needed to pay for the poll out of both accounts. If that turns out not to be the case, we will immediately remedy any issues. 'This election should be about protecting health care, creating jobs, and improving the lives of others. That's what I'm focused on.'

The final determination is up to the Ohio Elections Commission, which last week voted 6-1 to investigate Pureval's clerks of courts spending. If violations are found, potential fines for the failure to file accurate campaign finance reports can be \$15 to \$100 per day and the case could be referred to a prosecutor for criminal charges.

Two lawyers for Pureval's campaign held a press call Wednesday to respond to questions. They explained the poll was for both campaigns and the checks were written from both campaigns.

It's the first time a payment from the congressional campaign fund has come to light.

Pureval, a Democrat, was elected Hamilton County Clerk of Courts in 2016. He is running against Republican Steve Chabot for Ohio's 1st Congressional seat, a race that's being watched nationally.

The Enquirer obtained a copy of the poll, which was conducted by GBA Strategies from Jan. 11 to Jan. 16 and polled 400 likely voters.

The poll questions focused on whether the person would vote in the upcoming congressional race, asked several questions about Chabot, asked about the person's views on abortion and even asked a specific question about Chabot's paying his son-in-law to build his campaign website, the focus of a current attack ad against Chabot.

The poll mentions Pureval's time as clerk, but does not ask questions about

the 2020 clerk's race.

The Pureval campaign has twice insisted the poll was for both races, though the campaign refused to share its contents.

Pureval campaign manager Sarah Topy told the Enquirer in August, for the first spending story, "There is no story here."

"All of these expenditures were appropriate and legal. Any insinuation otherwise is simply wrong," she said. "It shouldn't surprise anyone that Steve Chabot wants to try and change the subject because he doesn't want to run on his record so he's looking to stir up non-stories where there aren't any."

Pureval campaign attorney Peter O'Shea told a group of reporters last week the money was for polling for both the clerk's race and congressional race. "Polling can be done for both races, and there's no law that prohibits from running for two offices at the same time."

**More: [Aftab Pureval spent \\$30K from his clerk campaign account this year. Was some for his congressional race?](#)**

**More: [Aftab Pureval's clerk campaign broke spending rules, Ohio election complaint charges](#)**

**More: [Ohio Elections Commission votes to probe Aftab Pureval campaign expenses](#)**

The spending has taken center stage in the race, prompting a drama-filled Hamilton County Board of Elections investigation into document redactions and an Ohio Elections complaint, which is going forward.

It all stems from Pureval's 2018 semi-annual campaign finance reports, in which he spent \$30,000 – a lot of money for a clerk's race that is two years

away. The Enquirer outlined questionable spending about travel, media and a \$16,400 expense paid to GBA Strategies for consulting. The firm is known for conducting congressional polls.

After the Enquirer story was published, Brian Shrive, an attorney for the Ohio Coalition Opposed to Spending and Taxes filed a complaint related to the spending with the Ohio Elections Commission.

At first, it was impossible to determine what the GBA spending was for because the memo line in checks related to expenses, including that one, were redacted.

That became its own drama at the Board of Elections about who did the redacting. Hamilton County Board of Elections Deputy Director Sally Krisel admitted she made the redactions at the request of Sarah Topy, Pureval's campaign manager. Krisel apologized for how she handled the matter.

In all, there were four checks, with four redactions. But after Krisel's admission, the Pureval campaign released unredacted checks showing the GBA expense was for "poll balance." The other memos lines were blank under the redactions.


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# Ohio Elections Commission Votes 6-1 to Launch Full Investigation Into Aftab Pureval's Campaign Spending

September 21, 2018 Anthony Accardi



It was another bleak turn of events Thursday for Aftab Pureval, the one-time wonderboy of the Democrat Party who has been pulling in donations from Democrats nationwide.

The Ohio Elections Commission voted 6-1 Thursday in favor of launching a full investigation into Pureval for allegedly using his county-clerk campaign funds to pay for federal campaign expenses. He is running against incumbent Congressman Steve Chabot, (R-OH-1).

Ohio Elections Commission Executive Director Philip Richter said there was

enough evidence of wrongdoing to proceed with the investigation.

Jessie Balmert first reported the story from the Cincinnati Enquirer :

Commission votes 6-1 to have another hearing looking into [@AftabPureval](#) expenses -- whether he used local campaign money to pay for federal campaign expenses.

— Jessie Balmert (@jbalmert) [10:29 AM - Sep 20, 2018](#)

A date for the hearing has yet to be announced.

As [reported by the Enquirer](#):

*If Pureval did use the county account for his federal race, such use could violate federal and state campaign finance laws. Violations of federal and state campaign finance laws can carry criminal penalties, including jail time.”*

“As we’ve said all along, Aftab Pureval is a phony politician who thinks the rules don’t apply to him,” said Chris Martin of the National Republican Congressional Committee, or NRCC, in a [statement](#) posted on the committee’s website Thursday.

Pureval is under investigation for the alleged improper use of \$30,000 from his County Clerk of Court’s account. This money appears to have been used for his congressional campaign. And the memo lines on the checks in question were blacked out so the public couldn’t get answers.

Were these checks indeed used for political purposes related to his congressional campaign? If the investigation finds they were, that’s a felony.

The complaint was originally brought by attorney Brian Shrive. It charges that Pureval spent over \$16,000 donated by his mother to his local campaign fund, which was designated solely for his Hamilton County Clerk of Courts

race, to pay for polling for his congressional race.

To make matters worse, someone at the Pureval campaign requested that employees of the Hamilton County Board of Elections redact the memo line of the checks in question. This makes it look like Pureval's campaign was trying to hide from the public what he was using the local campaign funds for.

Pureval now says, "I didn't know about the redaction and I didn't authorize it."

That comment indicates Pureval may be willing to sacrifice someone on his staff, perhaps even his campaign manager Sarah Topy, rather than shoulder blame for any irregularities.

Aftab Pureval explains: 'I didn't know about the redaction and I didn't authorize it.' <https://cin.ci/2xmgJoQ>

— Sharon Coolidge (@SharonCoolidge) 5:54 AM - Sep 20, 2018

Below is a scan of the unredacted check, which clearly shows it was used for polling.

And now, campaign shows unredacted check. Again, "poll balance."

— Sharon Coolidge (@SharonCoolidge) 11:21 AM - Sep 19, 2018

Pureval has said the money in question was used to pay for clerk of court campaign expenses. But that leaves investigators with the obvious question: Why was Pureval paying for polling for his local clerk's-office campaign more than two years before he was up for re-election? He had literally only been in office for a year and was already polling for his re-election, even though he had his eye on the congressional seat and not his local office? Apparently that is what Pureval expects everyone to believe.

Democrats will predictably be fine with that explanation, but the GOP



definitely smells blood in the water.

“Once again, Aftab Pureval’s lies and deceit are catching up to him,” Mandi Merritt, spokesperson for the Republican National Committee, said in an email Thursday. “Voters can see right through Aftab’s phony exterior and will remember these constant legal scandals when they head to the polls in November to elect Steve Chabot.”

Shrive said at Thursday’s hearing he would like for the matter to be resolved before the Nov. 6 election.

Pureval’s attorney said he doesn’t want this to become a sideshow.

Isn’t that what it’s already become?

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*Anthony Accardi is a writer and reporter for **The Ohio Star**.*