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Suite 600
Washington, D.C. 20005-3960+1.202.654.6200
+1.202.654.6211
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December 7, 2018

Brian G. Svoboda
BSvoboda@perkinscoie.com
D. +1.202.434.1654
F. +1.202.654.6211**BY HAND DELIVERY**Jeff S. Jordan, Esq.
Assistant General Counsel
Complaints Examination & Legal Administration
Federal Election Commission
1050 First Street, N.E.
Washington, D.C. 20463**Re: MUR 7507**

Dear Mr. Jordan:

On behalf of Aftab Pureval, Aftab for Ohio, and Evan Nolan in his official capacity as Treasurer for Aftab for Ohio ("Respondents"), we write in response to the complaint filed by the Foundation for Accountability and Civic Trust dated October 1, 2018 ("the Complaint"), and the supplement to that complaint dated October 11, 2018 ("the Supplemental Complaint"). The Commission should find no reason to believe that Respondents violated the Federal Election Campaign Act of 1971, as amended, 52 U.S.C. § 30101 *et seq.*

The Complaint and Supplemental Complaint allege that Mr. Pureval's nonfederal campaign committee received contributions in connection with a federal election, impermissibly paid \$16,400.79 for polling conducted before Mr. Pureval became a federal candidate, and impermissibly paid a combined \$6,035.66 to four other vendors to support the federal campaign. However, the contributions received by the nonfederal campaign committee were legal on their face. The facts also show that Respondents correctly allocated the costs of the poll according to Commission rules. Finally, the Complaint and Supplemental Complaint fail to allege that any of the remaining vendors was improperly paid, except for two minor payments that the federal principal campaign committee flagged and paid. The Commission should find no reason to believe Respondents violated the Act, dismiss the complaint and take no further action.

FACTS

Aftab Pureval is the Clerk of Courts in Hamilton County, Ohio. He was elected to his current position in 2016 for a four-year term and will be up for re-election in 2020. His nonfederal campaign committee, Friends of Aftab Pureval, is registered with and reports to the Hamilton County Board of Elections.

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Mr. Pureval also became a candidate for the U.S. House of Representatives in 2018. On January 29, 2018, he registered his federal principal campaign committee, Aftab for Ohio, with the FEC.¹ On January 31, 2018, he announced his candidacy.² Throughout 2018, Mr. Pureval concurrently maintained a campaign committee for Clerk of Courts, and a principal campaign committee for Congress, with both committees raising and spending funds as the law expressly provides.³

FACT filed the Complaint and Supplemental Complaint in October 2018, after the nonfederal campaign committee had filed its semi-annual report disclosing its receipts and disbursements, and after a third party filed a separate complaint with the Ohio Elections Commission (“OEC”), which contended broadly that Ohio law prohibited the nonfederal campaign committee’s receipts and disbursements, because they were allegedly received and made to influence Mr. Pureval’s federal election. The principal issue, both in the OEC complaint and in this present matter, was the nonfederal campaign committee’s partial payment of \$16,400.79 for a poll, taken from January 11 through January 16, 2018.⁴ As the questionnaire indicates, the poll was designed to help Mr. Pureval decide whether to run for Congress, or whether to remain and potentially to seek re-election as Clerk of Courts. While many of the poll’s questions focused on the potential congressional race, many tested arguments for and against Mr. Pureval, thus making the poll useful for Mr. Pureval’s candidacy for Clerk of Courts also.

After a public hearing, the OEC dismissed the complaint and took no further action, except to levy a \$100 fine over a \$360 payment to a photographer at Mr. Pureval’s congressional announcement event.⁵ Respondents had already admitted that this payment was erroneous, and the federal principal campaign committee issued a check to the photographer on September 30, 2018.⁶ Mr. Pureval lost the November general election for Congress, and the federal principal campaign committee anticipates terminating.

LEGAL ANALYSIS

The Complaint and Supplemental Complaint present transactions that are facially and expressly legal under Commission rules. Federal law specifically allows candidates to seek federal and nonfederal offices simultaneously, and to raise and spend funds for concurrent federal and nonfederal candidacies.⁷ No violation of the Act is presented simply by the fact that a nonfederal

¹ See <http://docquery.fec.gov/pdf/245/201801299090680245/201801299090680245.pdf>.

² See https://www.facebook.com/permalink.php?story_fbid=1784164105212707&id=1492972110998576.

³ See 52 U.S.C. § 30125(e)(2); 11 C.F.R. §§ 110.8(d), 300.62, 300.63.

⁴ See Supplemental Complaint. The federal principal campaign committee paid for one-half of the poll on June 8, 2018, through a disbursement that encompassed other expenses to the same pollster. <http://docquery.fec.gov/cgi-bin/forms/C00667519/1246059/>.

⁵ See Exhibit A.

⁶ See Exhibit B.

⁷ See 52 U.S.C. § 30125(e)(2); 11 C.F.R. §§ 110.8(d), 300.62, 300.63.

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campaign committee received funds subject to state law limits while a federal campaign was ongoing, nor by the fact that a nonfederal campaign committee spent funds while the federal campaign was ongoing. A valid complaint must present more than facially legal transactions to allege a violation, and this complaint fails that test.

I. The Nonfederal Campaign Committee's Receipts Were Facialy Legal and Present No Violation

With respect to the funds received by the nonfederal campaign committee, neither the Complaint nor the Supplemental Complaint alleges any fact to indicate that the receipts were in connection with a federal election, or otherwise impermissible. A valid complaint requires "facts which describe a violation of a statute or regulation over which the Commission has jurisdiction,"⁸ and a coincidence in timing between facially legal transactions is not enough to raise the specter of a violation. For example, in MUR 5304, the Commission considered a claim that a House candidate's nonfederal campaign committee made contributions to certain state candidates, who also made contributions to the House candidate's federal principal campaign committee.⁹ The Commission did not find reason to believe a violation occurred: "The only facts provided by Complainant, derived from public disclosure records, show a series of contributions that are legal on their face."¹⁰

This complaint suffers from the same defect. It presents no facts regarding any of these contributions, besides the fact that they were made, except: (1) the majority of funds were donated after Mr. Pureval announced his candidacy for federal office (which only stands to reason, since Mr. Pureval announced on January 31, and the Complaint cites a state campaign finance report that covered January 1 through June 30); and (2) one of the contributors was Mr. Pureval's mother. Neither offers any evidence of a violation of FECA or Commission regulations. If simply receiving contributions into a nonfederal campaign committee presented reason to believe that those contributions violated the Act, then the law's express allowances for dual candidacy would be functionally meaningless.

II. The Complaint Fails to Present a Violation Arising From the Nonfederal Campaign Committee's Disbursements

The Commission should dismiss the Complaint's allegation that the nonfederal campaign committee made prohibited disbursements. At issue are two categories of disbursements: (1) the \$16,400.79 partial payment for the poll, and (2) the \$6,035.66 paid to four other vendors. The poll payment was made in accordance with the Commission's poll allocation regulations at 11 C.F.R. § 106.4. As to the other payments, the claim of a violation is unsupported by evidence, except for

⁸ 11 C.F.R. § 111.4(d)(3)

⁹ See First General Counsel's Report, MUR 5304, at 4.

¹⁰ *Id.* at 8-9.

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two errant payments, which the federal principal campaign committee has reimbursed, and which are de minimis in any case.

A. Respondents Properly Paid for and Reported the Polling Expense

It was lawful and appropriate for the nonfederal campaign committee and the federal principal campaign committee to split the costs of a poll that, in large measure, tested Mr. Pureval's "positives" and "negatives" as a nonfederal officeholder. Commission rules permit a poll to be allocated among entities by dividing the overall cost of the poll equally among the entities receiving the results, or based on the number of question results received by one entity as a proportion of the total number of question results received by all entities.¹¹ The Commission has regularly concluded that state and federal committees may "share the costs of polls that include questions aimed at benefitting a federal candidacy."¹²

Respondents allocated the value of the poll according to these rules. The nonfederal campaign committee reported its share of the poll's value on Form 31-B, disclosing a payment of \$16,400.79 on April 4, 2018.¹³ In its turn, the federal principal campaign committee reported paying for its share of the poll on its July 2018 Quarterly Report. The text of the poll shows that the allocation between the two committees was reasonable and complied with Commission regulations. Initiated before Mr. Pureval became a candidate, the poll did not simply help him decide whether to seek federal office. It provided him with information about the voters' understanding of his performance as Clerk of Courts that will be useful to him while seeking re-election to that office. Also, had the results been different, and had Mr. Pureval not run for Congress, the poll would have counseled him to remain in his current nonfederal office, while suggesting how he might improve his performance and electability.

The sources and amounts in the nonfederal campaign committee's accounts presented no barrier to payment. The information presented by the Complaint and Supplemental Complaint indicate that the nonfederal campaign committee had sufficient funds on hand raised within federal limits

¹¹ 11 C.F.R. § 106.4(e).

¹² First General Counsel's Report, MUR 6529, at 5; *see also* Statement of Reasons of Commissioners Petersen, Hunter, and McGahn, MUR 6225, at 4 ("Commission regulations clearly allow committees to evenly split the costs associated with a poll"); First General Counsel's Report, MUR 5480, at 6-7 (recognizing that costs of poll may be split equally among candidates receiving the results).

¹³ *See* Exhibit C. The Complaint refers repeatedly to the fact that the nonfederal campaign committee, when producing check copies to accompany its report as Ohio law requires, redacted the memo lines from checks to the polling firm and other vendors. The identity of the vendor belies any supposed intent to deceive: the firm, GBA Strategies, "offers broad expertise in survey research and strategic consulting ... we delve deeply into our clients' issues and audiences, conduct high-quality research, and develop winning game plans." <http://www.gbastrategies.com/aboutgba/>.

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and restrictions to pay for its share of the poll.¹⁴ The law accordingly clearly permits the allocation of the poll between the two committees.

B. The Complaint Alleges No Facts to Show the Other Expenditures Were Impermissible, Save for Two Minor Expenses, Which the Federal Principal Campaign Committee Has Paid

Like the allegation concerning the donations received by the nonfederal campaign committee, the allegation regarding the other expenditures fails to establish any violation of FECA or Commission regulations. Like the other allegation, it relies simply on the fact that the nonfederal campaign committee made the payments while Mr. Pureval was also seeking federal office, and tries to fill in the gaps with speculation and unsupported legal conclusions.¹⁵

Each of the identified expenses was facially permissible. The Complaint does not offer any facts indicating that the payments to Mark Byron, Valentine Strategies, NGP VAN, or Brianna Ledsome were impermissible.¹⁶ The sole support for these allegations is that: (1) Valentine Strategies also provided consulting services to Respondents; and (2) Brianna Ledsome had also worked for Respondents.¹⁷ These assertions are purely speculative and do not provide any evidence indicating that the payments by the non-federal committee were for services provided to Respondents. The Commission has regularly dismissed similar allegations concerning shared employees and vendors.¹⁸

As discussed above, Respondents independently determined that the \$360 payment to Byron, the photographer, was made by mistake, and the federal principal campaign committee paid him accordingly. Likewise, Respondents discovered that NGP VAN had been debiting the wrong committee's bank account, at which point Respondents directed NGP VAN to cease debiting that account and the federal principal campaign committee paid NGP VAN for the relevant expenses.¹⁹

¹⁴ See Exhibit D (nonfederal campaign committee report shows \$10,691.69 cash on hand and \$31,320.00 in receipts).

¹⁵ See, e.g., First General Counsel's Report, MUR 6820, at 5-6 (payments made to staffer providing services to dual committees do not "provide enough to investigate" and status "as a shared employee" is not "*per se* indicative of an effort by the State Committee to subsidize the Federal Committee").

¹⁶ With respect to the disbursement to Mark Byron for photography services, Aftab for Ohio paid for these services on September 30, 2018, after receiving information indicating that the disbursement may have been made from the improper account. See Exhibit B. Mr. Pureval's nonfederal committee has requested (and is currently awaiting) a refund from Mr. Byron. Likewise, Aftab for Ohio paid for the services provided by NGP VAN, see Exhibit E, after receiving invoices from the vendor showing that amounts had been mistakenly debited from the nonfederal committee's bank account. Mr. Pureval's nonfederal committee has requested (and is currently awaiting) a refund from NGP VAN.

¹⁷ See Compl. at 4-5.

¹⁸ See, e.g., First General Counsel's Report, MUR 6820, at 5-6.

¹⁹ See Exhibit E.

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In keeping with its past practice, the Commission should exercise its prosecutorial discretion and dismiss the allegations concerning the insubstantial payments to Mr. Byron and NGP VAN, which have since been corrected.²⁰

CONCLUSION

At the heart of the Complaint and Supplemental Complaint are facially lawful contributions to a nonfederal campaign committee; the allocation of a polling expense that complied with the Commission's detailed rules; and a handful of smaller expenses which are disputed through speculation. Accordingly, the Commission should find no reason to believe that a violation of the Act has occurred, and dismiss this matter. Respondent respectfully requests the Commission promptly dismiss the matter and close the file, so that the federal principal campaign committee may terminate its registration.

We appreciate the Commission's consideration of this response.

Very truly yours,



Brian G. Svoboda
David J. Lazarus
Counsel to Respondents

²⁰ See First General Counsel's Report, MUR 6820, at 9-10 (payment of \$1,750); *id.* at 10-11 (\$1,000 contribution); First General Counsel's Report, MUR 6529, at 15.

Exhibit A

WCPO

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State commission dismisses Aftab Pureval poll payment complaint, issues \$100 fine over photo shoot

BY: Tom McKee

POSTED: 4:10 PM, Nov 1, 2018

UPDATED: 1:25 AM, Nov 2, 2018

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COLUMBUS, Ohio -- "For months, I've been saying that we followed the letter and the spirit of the law, and today, we are vindicated," Aftab Pureval told a group of local reporters at his campaign headquarters Thursday afternoon.

Hours earlier, the Ohio Elections Commission dismissed two of the three campaign finance violation charges that hampered the Hamilton County Clerk of Courts' congressional run throughout October, forming a nexus of press coverage and fertile ground for Republican opponent Rep. Steve Chabot's television ads.

The commission determined that Pureval's team did improperly use clerk of courts campaign funds to pay a photographer \$360 for a photo shoot attached to his congressional campaign. Former campaign manager Sarah Topy testified she had made the payment by accident while using a Venmo account linked to several credit cards.

The punishment: A \$100 fine, which Pureval said at the news conference he intended to pay

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originator of the complaints) Mark Miller.

The commission dismissed Miller's claim over a larger polling payment, which he alleged had been improperly taken out of the Hamilton County clerk of courts campaign budget although it was exclusively meant for Pureval's congressional run. The candidate and his staff repeatedly denied this.

"The poll would tell us whether a path forward with a congressional campaign made sense or whether we should stay with the clerk of courts," Pureval testified Thursday, as he did at a WCPO-hosted debate in late October. "Based on the results of the poll, it looked like a congressional campaign, that there was viability for it. If the results had been different, I would have stayed put."

The commission voted 4-3 in favor of no violation for an allegation of filing an improper campaign finance report and voted 4-3 in favor of dismissing the polling payment complaint. They voted 5-2 in favor of finding the photo shoot payment was a violation and voted 6-1 in favor of the \$100 fine.

Finney said the dismissal of the polling payment claim is "a green light to any state campaign to launder money for a federal campaign." He alleged it was a violation of federal law.

"Don't believe any attempt by Aftab Pureval to claim that he was exonerated," Chabot campaign spokesman Cody Rizzuto said in a written statement. "He wasn't. He was convicted on one charge and the commission failed to reach a verdict on the other."

Pureval said the commission's ruling showed that the accusations were "baseless" and alleged that Chabot's campaign had been "deliberately and maliciously misleading voters" over the issue.

That resolved, he launched with renewed fervor into a final-week pitch for his campaign.

"We've got the momentum, and I'm excited about today's result," he said. "We've been totally vindicated. Guys, for months on television, Steve Chabot's been telling voters I'm going to go to jail. There's been coverage saying I could potentially go to jail. And today resulted in a \$100 fine. (The people of the 1st District) are looking for something positive, something substantive. That's what we're offering, and that's why we're going to win."

close

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Exhibit B

Exhibit C

Form 31-B

I.C. 3517.10

Name of Committee: Friends of Aftab Pureval

To Whom Paid	Address	City	ST	Zip	Date	Amount	Purpose	Method of Payment
NGP VAN	1445 New York Ave	Washington	DC	20005	01/02/2018	\$466.24	Fees	Debit
Dan Babou Cab	Best efforts				01/05/2018	\$38.00	Travel	Check #1060
Joe Levy	573 S Kellner Rd	Columbus	OH	43209	01/08/2018	\$2,884.00	Travel	Debit-Venmo
Hotwire	333 108th Ave. NE	Bellevue	WA	98004	01/29/2018	\$98.05	Travel	Debit
Panera	1 E. 6th Street	Cincinnati	OH	45202	01/29/2018	\$225.86	Food	Debit
Delta	1030 Delta Ave	Atlanta	GA	30354	01/29/2018	\$300.60	Travel	Debit
Sarah Topy	573 S Kellner Rd	Columbus	OH	43209	02/02/2018	\$412.00	Travel	Debit-Venmo
NGP VAN	1445 New York Ave	Washington	DC	20005	02/02/2018	\$775.00	Software	Debit
NGP VAN	1445 New York Ave	Washington	DC	20005	02/02/2018	\$18.05	Fees	Debit
Mark Byron	2100 W 8th Street	Cincinnati	OH	45202	02/05/2018	\$360.50	Media	Debit-Venmo
Uber	1455 Market Street	San Francisco	CA	94103	02/07/2018	\$9.00	Travel	Debit
Sarah Topy	573 S Kellner Rd	Columbus	OH	43209	02/20/2018	\$162.74	Tickets	Debit-Venmo
Human Rights Campaign	1640 Rhode Island Ave. N.W.	Washington	DC	20036	02/20/2018	\$579.00	Contribution	Debit
Brianna Ledsoe	4013 Ivanhoe Avenue	Cincinnati	OH	45212	02/28/2018	\$206.00	Consulting	Debit-Venmo
NGP VAN	1445 New York Ave	Washington	DC	20005	03/02/2018	\$775.00	Software	Debit
NGP VAN	1445 New York Ave	Washington	DC	20005	03/02/2018	\$17.37	Fees	Debit
Wild Eggs	301 E. 4th Street	Cincinnati	OH	45202	03/16/2018	\$27.94	Food	Debit
Delta	1030 Delta Ave	Atlanta	GA	30354	03/19/2018	\$139.30	Travel	Debit
Eddie Davenport	3835 Hyde Park Avenue	Cincinnati	OH	45209	03/26/2018	\$43.26	Food	Debit-Venmo
CVS	2532 Main St	Bexley	OH	43209	04/02/2018	\$205.95	Supplies	Debit
NGP VAN	1445 New York Ave	Washington	DC	20005	04/02/2018	\$775.00	Software	Debit
Sarah Topy	573 S Kellner Rd	Columbus	OH	43209	04/03/2018	\$257.50	Reimbursements for dinner	Debit-Venmo
GBA Strategies	1701 K Street	Washington	DC	20008	04/04/2018	\$16,400.79	Consulting	Check #1061
Brianna Ledsoe	4013 Ivanhoe Avenue	Cincinnati	OH	45212	04/04/2018	\$515.00	Consulting	Debit-Venmo
Cecil Thomas for Senate	545 E. Town Street	Columbus	OH	43215	04/30/2018	\$500.00	Contribution	Check #1064
NGP VAN	1445 New York Ave	Washington	DC	20005	05/02/2018	\$775.00	Software	Debit
Valentine Strategies	PO Box 6000	Cincinnati	OH	45206	05/09/2018	\$578.63	Supplies reimbursement	Check #1065
Ohio Ethics Commission	30 W. Spring Street	Columbus	OH	43215	05/15/2018	\$60.00	Fees	Debit
NGP VAN	1445 New York Ave	Washington	DC	20005	06/04/2018	\$775.00	Software	Debit
					Page Total:	\$28,380.78		

Exhibit D



HAMILTON COUNTY
BOARD OF ELECTIONS

2018 JUL 31 PM 3:33

Committee Name Friends of Aftab Pureval		Office Sought Hamilton County Clerk of Courts		District
Street Address 580 Walnut Street, Apt. 1302		City Cincinnati	State OH	Zip 45202
Candidate Name OR PAC Registration Number Aftab Pureval		Treasurer Name Evan Nolan		Election Date (MM/DD/YYYY) 11/06/2016

Type of Report (choose one):

- Annual
 Semiannual
 Pre-Primary
 Post-Primary
 Pre-General
 Post-General

Statewide Candidates Only:

- July Monthly
 August Monthly
 September Monthly

Year
2018

Amended Report <input type="checkbox"/> No <input type="checkbox"/> Yes	Termination <input type="checkbox"/> Check this box if the committee wishes to terminate with this report	Short Form Report (R.C. 3517.10(H)) <input type="checkbox"/> Check this box if the committee is filing a short term report. See attached instructions.
--	--	---

1. Amount brought forward from last report	10691.69
2. Total monetary contributions (From Forms 31-A and 31-E)	31320.00
3. Total other income (From Form 31-A-2)	0.00
4. Total funds available (sum of lines 1, 2, 3)	42011.69
5. Total monetary expenditures (From Forms 31-B and 31-F)	28380.78
6. Balance on hand (line 4 minus line 5)	13630.91
7. Value of in-kind contributions received (From Form 31-J-1)	
8. Value of in-kind contributions made (From Form 31-J-2)	
9. Outstanding loans owed by committee (From Form 31-C)	
10. Outstanding debts owed by committee (From Form 31-N)	
11. Outstanding loans owed to committee (From Form 31-K)	
12. Value of independent expenditures made (From Form 31-U)	

THIS STATEMENT IS MADE UNDER PENALTY OF ELECTION FALSIFICATION.
WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE.

Evan Nolan
Signature of Treasurer or Deputy Treasurer

07/31/2018
Date (MM/DD/YYYY)

Contribution Pages
1

Expenditure Pages
1

Other Pages
1

Total Pages
3

R.C. 3517.10

Name of Committee: Friends of Aftab Pureval

Name	Address	City	ST	Zip	Occupation	Employer	Reg. # If	Date	Amount	Form
Janet Allen-Reid	1824 Elm St	Cincinnati	OH	45202	Retired	Not Employed		01/23/2018	\$50.00	Debit
Janet Campbell	345 E. 7th Street	Cincinnati	OH	45202	Retired	Not Employed		01/24/2018	\$100.00	Debit
Meredith Roblyer	3600 Cachepit Way	Cincinnati	OH	45227	Not Employed	Not Employed		01/29/2018	\$150.00	Debit
Charles Kamine	8450 Arborcrest Dr.	Cincinnati	OH	45236	Attorney	Kamine & Schilling LLC		01/30/2018	\$100.00	Check
Graydon Good Government Committee	553 Lassing Way	Walton	KY	41094				01/30/2018	\$600.00	Check
Jane Doster	4265 Westminister Way	Mason	OH	45040	Retired	Not Employed		01/31/2018	\$50.00	Debit
Drenko Pureval	13 Medalist Way	Xenia	OH	45385	Retired	Not Employed		02/01/2018	\$15,000.00	Check
Peter St. John	1382 Burdett Ave	Cincinnati	OH	45206	Not Employed	Not Employed		02/02/2018	\$20.00	Debit
Susan Black	5700 Drake Road	Cincinnati	OH	45243	Retired	Not Employed		02/06/2018	\$250.00	Debit
Drenko Pureval	13 Medalist Way	Xenia	OH	45385	Retired	Not Employed		04/11/2018	\$15,000.00	Check
								Page Total:	\$31,320.00	

Exhibit E

THIS PAGE OF THIS DOCUMENT HAS A VOIDABLE BACKGROUND OR WHITE PAPER AND ORIGINAL DOCUMENT SECURITY SCREEN ON THE FRONT AND SECURITY FLOOR

Aftab for Ohio
P.O. Box 713
Cincinnati, OH 45201

Fifth Third Bank

1843

13-31/420

12/04/2018

PAY TO THE ORDER OF **NGPVAN**

\$ ****7,075.00**

Seven thousand seventy-five and 00/100*****

DOLLARS

NGP VAN, Inc
1445 New York Avenue, NW, 2nd Floor
Washington, DC 20005



Void after 90 days
[Signature]
AUTHORIZED SIGNATURE

MEMO

Security features included. Details on back.

Aftab for Ohio

12/04/2018

NGPVAN

Jan-June 2018 & 4th Qtr 2018

7,075.00

1843

5/3 BUSINESS ELITE CHECKING (1421)

7,075.00

Aftab for Ohio

12/04/2018

NGPVAN

Jan-June 2018 & 4th Qtr 2018

7,075.00

1843

5/3 BUSINESS ELITE CHECKING (1421)

7,075.00