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December 7, 2018

Via Electronic Mail (CELA@fec.gov)
Jeff S. Jordan, Esq.
Assistant General Counsel
Complaints Examinations & Legal Administration
Federal Election Commission
1050 First Street, N.E.
Washington D.C. 20463

Digitally signed
by Kathryn Ross

Date:
2018.12.07
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RE: MUR 7507

Dear Mr. Jordan:

On behalf of Drenko Pureval, I write in response to the complaint filed by the Foundation for Accountability and Civic Trust on October 1, 2018, and supplemented on October 11, 2018. It is my understanding that counsel for Aftab Pureval, Aftab for Ohio, and Evan Nolan (in his official capacity as Treasurer for Aftab for Ohio) have separately responded to the Complaint, and have demonstrated that as a matter of fact and law, the proper disposition here is to dismiss the complaint. We adopt and incorporate by reference the entirety of that response here.

In addition, I would urge the Commission to consider that FACT's complaint requests only investigation and/or enforcement action against Aftab Pureval, and his authorized campaign committee and its treasurer. The complaint does not ask that any further action be taken regarding Drenko Pureval, and the complaint does not allege that she engaged in any misconduct.

This silence is no accident. As the complaint acknowledges, Drenko Pureval's contributions to her son's non-federal campaign committee were permissible under Ohio law. Since the thrust of the complaint is the allegation – which is false in any event – that these contributions were misused, it makes sense that the focus of the complaint would be on the acts and decisions of those in a position to control the use of funds after they left Ms. Pureval's hands. In this regard, the complaint contains neither allegation nor facts supporting even the inference that Ms. Pureval had any ability or right to control how her contributions

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to the non-federal campaign committee would be spent. Similarly, the complaint does not allege that Ms. Pureval had any advance knowledge, or reason to know, how her contributions would be used after she made them.

Regardless of what the Commission may choose to do with respect to this complaint in general, it should dismiss Ms. Pureval as a respondent in this matter because the complaint does not allege any violation of FECA or this Commission's rules by her.

I appreciate the Commission's consideration of this response. Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

/s/ Patrick Quinn

Patrick M. Quinn
Counsel for Respondent Drenko Pureval

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