

SANDLER REIFF

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April 9, 2019

Mr. Jeff S. Jordan
Assistant General Counsel
Office of Complaints Examination and Legal Administration
Federal Election Commission
1050 First Street, N.E.
Washington, D.C. 20463

Re: MUR 7582

Dear Mr. Jordan:

The undersigned serves as counsel to Candide Group LLC and Aner Ben-Ami. This letter responds to a complaint filed by a group called The Patriot's Foundation. The foundation, a purported non-profit organization, makes several inaccurate and false claims against respondents to allege that federal and state campaign finance laws have been violated. Rather than respond to the numerous factual and legal inaccuracies alleged in the complaint, it will be much easier to provide a proper accounting of the facts. As you will see, no violations of any laws have occurred.

The facts in this matter are simple. Candide Group LLC is, indeed, a limited liability corporation. Candide Group LLC was formed in 2015 to provide consulting services related to impact investing.¹ As part of its services, Candide Group LLC espouses the achievement of social equity and sustainability. As part of these goals, Candide Group LLC encourages political engagement and activism, including the making of contributions to progressive candidates and causes.

Contrary to the assertion in the complaint, the LLC has elected taxation as a partnership, and not as a corporation – Morgan Simon and Aner Ben-Ami as its two members. Ms. Simon has at all times been a United States citizen. Mr. Ben-Ami became a permanent resident alien of the United States in March 2012, and a naturalized United States citizen in July of 2018.

¹ The LLC was originally called More Better Impact, LLC but amended its name in 2017 to Candide Group LLC.

Candide Group LLC acknowledges that its website includes a page of “candidates supported.” *However, none of the contributions listed on this page were made by Candide Group LLC or Mr. Ben-Ami.*

All of the contributions listed on the LLC’s web site were personal contributions made to federal and state contributions *by Ms. Simon*, as follows:

2016 – Kamala Harris – U.S. Senate – \$250

2017 – Nikki Fortunao-Bas – Oakland City Council – \$50

2017 – Barbara Lee – U.S. House of Representatives – \$15

2017 – Andrew Gillum – Florida Governor – \$50

2017 – Ben Jealous – Maryland Governor – \$50

All of the above listed contributions by Ms. Simon were made from personal funds and Ms. Simon has not been reimbursed for her contributions by Candide Group LLC or any other person.

Mr. Ben-Ami emigrated to the United States in 2007 to attend graduate school. Mr. Ben-Ami became a permanent resident alien of the United States in March of 2012 and became a United States citizen in July of 2018. Thus, Mr. Ben-Ami has been eligible to make political contributions in the United States since 2012 to both federal and state officeholders and committees.² To the best of his recollection, Mr. Ben-Ami has made only one personal political contribution in the United States – in November 2016, Mr. Ben-Ami made a \$50 contribution to a federal political committee called My Ride to Vote.

Although Candide Group LLC is eligible to contribute directly to federal and state candidates, *it has never made any political contributions.* Notwithstanding, it is anticipated that Candide Group LLC will make political contributions, where lawful, in the future. In addition, Candide Group LLC has added language to its donation page to clarify that 1) it is a lawful contributor and 2) some of the contributions listed on the page may reflect personal contributions from its members or employees.

It is shameful that a purported charitable “watchdog” group has used this official governmental process to harass and file false allegations against hard working Americans. As explained above, none of the allegations in the complaint have any merit and the Commission should immediately determine that there is no reason to believe the either Candide Group LLC or Aner Ben-Ami has violated any laws.

If you have any questions regarding this Response, my daytime number is (202) 479-1111. My email address is reiff@sandlerreiff.com.

² 11 C.F.R. § 110.20(a)(3)(ii).

Sincerely,



Neil Reiff



David Mitrani

Counsel to Candide Group LLC and Aner
Ben-Ami

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