

SHER TREMONTE LLP

April 2, 2019

BY FEDEX AND EMAIL

Jeff S. Jordan
Federal Election Commission
Office of Complaints Examination
and Legal Administration
Attn: Christal Dennis, Paralegal
1050 First Street, NW
Washington, DC 20463

2019 APR -3 PM 12:49

OFFICE OF
GENERAL COUNSELRe: **MUR 7583**

Dear Mr. Jordan:

As set forth in the enclosed Designation of Counsel, we represent Rinat Akhmetshin in connection with the above-referenced Matter Under Review. We write in response to your letter dated March 25, 2019, which encloses yet another baseless Complaint against our client filed by Joseph Weinzettle.

In brief, the allegations of this Complaint fail to demonstrate with any specificity the scurrilous charge that Mr. Akhmetshin acted as "the intermediary" for "substantial contributions from foreign organizations to KEMP FOR GOVERNOR and GEORGIA REPUBLICAN PARTY." (See Compl. at 4.) No such evidence exists, and the Complaint's rank speculation to the contrary does not warrant further investigation by this Commission.

Indeed, as was the case with Mr. Weinzettle's last complaint against Mr. Akhmetshin, each and every allegation of this Complaint concerning Mr. Akhmetshin is false and misleading. We briefly consider these meritless allegations below.

Allegation: "Akhmetshin registers anti-Magnitsky Act lobbying organization 'Human Rights Accountability Global Initiative Foundation'; lists foreign principal as Denis Katcyv (Kaysyv, Moscow, Russia, owner Prevezon Holdings, LLC)." (Compl. at 1.)

Response: For several months in 2016, Mr. Akhmetshin worked as a registered lobbyist for the Human Rights Accountability Global Initiative ("HRAGI"), whose stated goal was an independent review of the

Jeff S. Jordan
 April 2, 2019
 Page 2

Magnitsky Act's factual findings and the removal of Sergei Magnitsky's name from the law. Mr. Akhmetshin did not "register" or create HRAGI; Mr. Akhmetshin understands that Baker & Hostetler LLP created HRAGI.

Allegation: "A similar pattern of online contacts and suspicious payments occurred in Florida in 2018. After AKHMETSHIN was signaled on July 15, 2017 by Twitter account @Florida_32301, GOP chair signaled @wikileaks then @MihaiBasarab contacted DeSantis campaign @repdesantis to offer foreign 'IT' support." (Compl. ¶ 1.)

Response: Mere mention of Mr. Akhmetshin's name on Twitter does not support the serious charge against our client. Mr. Akhmetshin cannot control what others write about him on social media. Moreover, we note that the date of the alleged Facebook post is July 15, 2017 – one day after the media first reported Mr. Akhmetshin's presence at a meeting at Trump Tower in June 2016. Many news articles were written about Mr. Akhmetshin on July 14, 2017. Thus, it should come as no surprise that Mr. Akhmetshin's name appeared on social media the next day.

Allegation: "AKHMETSHIN'S 'consulting' fees were concealed in groups of payments which average \$45,000. . . . GEORGIA REPUBLICAN PARTY *appears* to have paid AKHMETSHIN through 'September Group, LLC'." (Compl. ¶ 5 (emphasis added).)

Response: This claim is patently false, and the Complaint alleges no facts that would suggest otherwise.

Allegation: "In 2016-2017, AKHMETSHIN was paid by Florida GOP consultant Lanny Wiles through 'Human Rights Accountability Global Initiative Foundation.' Wiles paid AKHMETSHIN \$72,500 for undisclosed services." (Compl. ¶ 5.)

Response: This claim is false and misleading. Mr. Akhmetshin did not receive any payments from Lanny Wiles through HRAGI. To be clear, Mr. Akhmetshin did receive a payment from Lanny Wiles around this time, but the payment was compensation for an entirely unrelated energy project in Central Asia.

Allegation: "Consistent with AKHMETSHIN's work as 'media consultant,' negative campaigning against Stacey Abrams included false accusations of anti-Semitism. AKHMETSHIN previously used false anti-Semitism charges

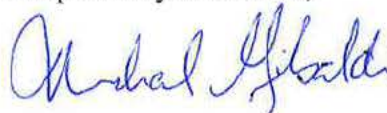
Jeff S. Jordan
April 2, 2019
Page 3

against an opponent of Putin's government, a Russian exile in California, as reported by Mike Eckel, *Radio Free Europe* (July 17, 2016). AKHMETSHIN reportedly planted the false story in Jewish Journal (Zalmayev, March 9, 2011), according to Sam Kestenbaum, *Fast Forward* (July 14, 2017)." (Compl. ¶ 8.)

Response: This claim is also false. Mr. Akhmetshin has never used false charges of anti-Semitism against anyone, and the Complaint fails to allege any facts that would suggest otherwise.

In sum, the Complaint does not warrant further investigation by this Commission. Should you have any additional questions, please do not hesitate to contact us. We can be reached at (212) 202-2600 or mtremonte@shertremonte.com.

Respectfully submitted,



Michael Tremonte
Michael W. Gibaldi

Enclosure

OFFICE OF
GENERAL COUNSEL

FEDERAL ELECTION COMMISSION
Washington, DC 20463

2010 APR -3 PM 12:54

Statement of Designation of Counsel

Provide one form for each Respondent/Witness
 FAX 202-219-3923

CASE: MUR 7583

Name of Counsel: Michael Tremonte and Michael Gibaldi

Firm: Sher Tremonte LLP

Address: 90 Broad Street, 23rd Floor

New York, NY 10004

Telephone: (212) 202-2600 **Fax:** (212) 202-4156

The above named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

04/01/10
Date

[Signature]
Signature

Title

RESPONDENT: Rinat Akhmetshin
 (Committee Name/Company Name/Individual Named In Notification Letter)

MAILING ADDRESS:

NW, Washington, DC 20005

Telephone:(H): **(W):**

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person receiving the notification or the person with respect to whom the investigation is made.