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October 23, 2019

**VIA ELECTRONIC MAIL**

Federal Election Commission  
Office of Complaints Examination and Legal Administration  
Attn: Christal Dennis, Paralegal  
1050 First Street, NW  
Washington, DC 20463  
Email: CELA@fec.gov

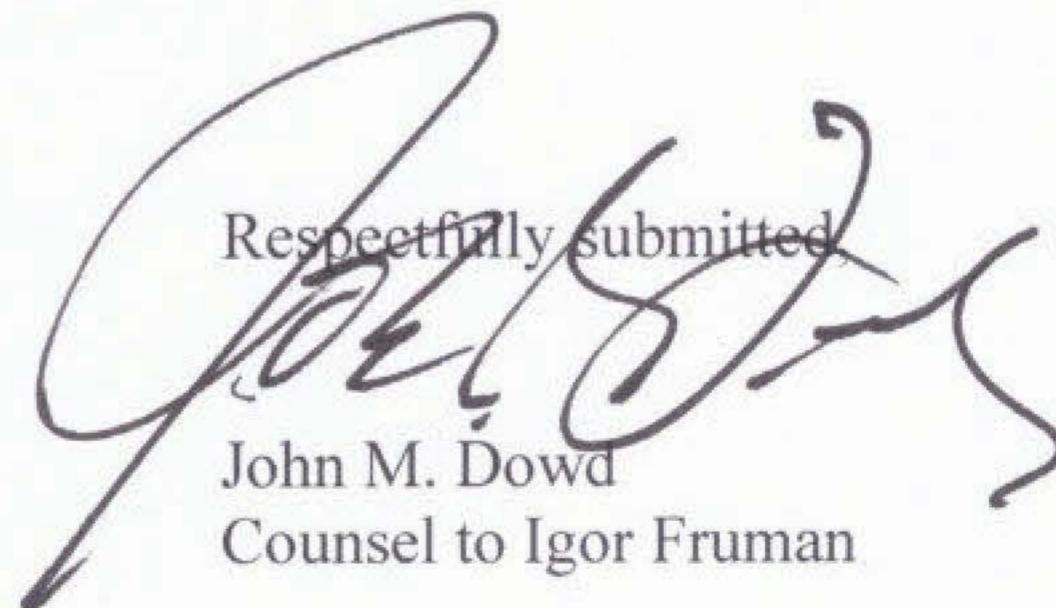
**Re: Federal Election Commission Complaint dated September 23, 2019**

Dear Mr. Jordan,

My client, Igor Fruman, received your letter dated September 27, 2019, and the attached Federal Election Commission complaint dated September 23, 2019.

On October 10, 2019, my client was indicted in the Southern District of New York for alleged campaign finance violations. There is substantial overlap between the contributions that are the subject of the criminal indictment and those referenced in the September 23, 2019, complaint.

Given this overlap, a stay in this administrative proceeding is clearly appropriate pending resolution of the criminal case because the administrative proceeding could undermine my client's Fifth Amendment privilege, expand the rights of criminal discovery beyond the limits of Federal Rule of Criminal Procedure 16(b), expose the basis of my client's defense to the prosecution in advance of a criminal trial, or otherwise prejudice the criminal case. *S.E.C. v. Dresser Indus.*, 628 F.2d 1368 (D.C. Cir. 1980); *see also United States v. Kordel*, 397 U.S. 1 (1970).

  
Respectfully submitted  
John M. Dowd  
Counsel to Igor Fruman

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Ed MacMahon ([ebmjr@macmahon-law.com](mailto:ebmjr@macmahon-law.com))