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December 20, 2019

Federal Election Commission
Office of General Counsel
Office of Complaints Examination
& Legal Administration
attn: Kathryn Ross, Paralegal
1050 First Street, NE
Washington, DC 20002

Re: Response of Dr. Lisa Sparks and Dr. Lisa Spark for Congress in MUR 7662

Dear Ms. Stevenson,

This Response is submitted by the undersigned counsel on behalf of Dr. Lisa Sparks and Dr. Lisa Sparks for Congress in response to the Complaint designated as Matter Under Review 7662.

The Complaint, filed by a donor to a primary opponent of Dr. Lisa Sparks, insinuates without any factual basis that a contribution to the Sparks Campaign from Dr. Sparks' daughter, Elena Bethea, is somehow improper. The Complaint concludes that this contribution "merits scrutiny" based solely on the observation that Ms. Bethea is a student and is related to her mother, a candidate for federal office.

The Complaint fails to provide any evidence to suggest that the Campaign Committee had any factual knowledge or reason to believe that the contribution at issue was improper. Mere speculation does not merit the Commission's time or resources. *See* Statement of Reasons in MUR 4960 (Hillary Rodham Clinton for Senate) at 3 ("Purely speculative charges, especially when accompanied by a direct refutation, do not form an adequate basis to find reason to believe that a violation of the FECA has occurred."). Ms. Bethea is not a minor child. She is fully capable of making her own decisions on how to spend money held in her own bank account. That is precisely what she did in this instance. The Campaign had no reason to believe that this was not an otherwise permissible contribution.

As set forth above, the Complaint filed in this matter should be dismissed. The contribution made to the Campaign is facially valid, and there is no information available that would cause a reasonable person to conclude otherwise.

Please feel free to contact me if you have any questions or require any additional information.

Sincerely,



Chris Winkelman
HOLTZMAN VOGEL JOSEFIK TORCHINSKY PLLC
*Counsel to Dr. Lisa Sparks and
Dr. Lisa Sparks for Congress*



FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

EMAIL: cela@fec.gov FAX: 202-219-3923

MUR # 7662

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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.

12/17/2019

Date

[Handwritten Signature]

Signature (Respondent/Agent)

Dr. Lisa Sparks for Congress;
Dr. Lisa Sparks

Candidate

Title

RESPONDENT:

(Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address:
(Please Print)

Newport Beach, CA 92660

Telephone (H):

(W):

E-mail: info@campaign-compliance.com

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 under investigation.