

JONES DAY

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Digitally signed
 by Kathryn Ross
 Date: 2020.06.17
 10:51:04 -04'00'

June 17, 2020

CONFIDENTIAL
COMMUNICATION

VIA E-MAIL TO CELA@FEC.GOV

Federal Election Commission
 Office of Complaints Examination & Legal Administration
 Attn: Kathryn Ross, Paralegal
 1050 First Street, N.E.
 Washington, DC 20463

Re: Matter Under Review 7737

Dear Office of Complaints Examination & Legal Administration:

Enclosed please find a response to the Complaint in the above-captioned MUR on behalf of Trump Victory and Treasurer Bradley T. Crate.

Very truly yours,

/s/ E. Stewart Crosland

E. Stewart Crosland

Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION

)
) **MUR 7737**
)

**RESPONSE OF RESPONDENTS TRUMP VICTORY AND
 TREASURER BRADLEY T. CRATE TO THE COMPLAINT**

Respondents Trump Victory and Treasurer Bradley T. Crate hereby respond to the Complaint in the above-captioned MUR, which, as the facts show, should be dismissed immediately as to Respondents. On the night of July 2, 2019, an online credit card contribution was made in Complainant's name to Trump Victory. *See* Ex. 1 (online payment processor report for July 2, 2019 contribution). On July 10, 2019, Trump Victory received another \$1,000 contribution charged on a different credit card where the donor information submitted online identified Complainant's spouse as the contributor, *see* Ex. 2 (online payment processor report for July 10, 2019 contribution), and Trump Victory reported the contribution accordingly. However, on May 7, 2020, Complainant represented in an email to Trump Victory that his spouse was ineligible to contribute and that both of these July 2019 contributions actually had been made from Complainant's personal funds. *See* Ex. 3 (May 7, 2020 R. Manchanda, Esq. email to Trump Victory representatives). Based on these representations, Trump Victory attributed the July 10, 2019 contribution to Complainant and amended its disclosure report the same day. *See* Amended 2019 October Quarterly Report at 634 (May 7, 2020), <https://docquery.fec.gov/cgi-bin/fecimg/?202005079232496757>. Any inadvertently inaccurate reporting thus has been corrected, no excessive or apparently prohibited contribution occurred, and the Commission should dismiss the Complaint and close the file as to Respondents.¹

¹ It is worth noting that while in the midst of finalizing his Complaint with the FEC, Complainant made a \$100 contribution to Trump Victory on May 11, 2020, to attend a May 12, 2020 virtual event.

EXHIBIT 1

Payment

ch_1ErwayJzJZUj6TXtiNtnbyKk

\$1,000.00 USD

Succeeded ✓

Date	Customer	Payment method	Risk evaluation
Jul 2, 2019, 8:45 PM	info@manchanda-law.com	<div>DISCOVER</div> <div>••••</div>	<div>Shield</div> Normal

Timeline

✓

Payment succeeded

Jul 2, 2019, 8:45 PM

Shield

Stripe risk evaluation: normal


Jul 2, 2019, 8:45 PM

Payment details

Statement descriptor	TRUMP VICTORY
Amount	\$1,000.00
Fee	\$0.00
Net	\$1,000.00
Status	Succeeded
Description	No description <div>✎ Edit</div>

Payment method

ID	Rahul Manchanda	
Number	•••• 5468	Address
Fingerprint		30 Wall Street 8th Floor
Expires		New York, NY, 10023
Type	Origin	United States <div>US</div>
	CVC check	Passed ✓
	Street check	Failed
	Zip check	Passed ✓

USER AGENT		LOCATION	
Operating system	iOS 12.3.1	Device IP address	
Browser	Mobile Safari		
Device	iPhone	Card billing address	30 Wall Street 8th Floor, New York, NY, 10023
		Distance	4 miles
			

Metadata	
Mailing Address	30 Wall Street 8th Floor
Zip Code	10005
State	NY
City	New York
Email	
Last Name	Manchanda
First Name	Rahul
Employer	Manchanda Law Office PLLC
Occupation	Attorney
Source URL	
Source Code	
Recurring Gift	FALSE
Batch	Revv
Fund Code	TVICT
additional_metadata	{"Donation Drive":"Trump Victory Bedminster- Low Dollar ","Donation Type":"Regular Donation"}

6/4/2020

revv_uid

rv_ch_WBN7ckoWvq9uNXAU6Jk33sHH

EXHIBIT 2

Payment

ch_1EukeYJzJZUj6TXtj1e5pC0x

\$1,000.00 USD Succeeded ✓

Date	Customer	Payment method	Risk evaluation
Jul 10, 2019, 2:36 PM	info@manchanda-law.com	<div><div>VISA</div><div>••••</div></div>	<div><div>Shield</div>Normal</div>

Timeline

✓

Payment succeeded

Jul 10, 2019, 2:36 PM

Shield

Stripe risk evaluation: normal

Jul 10, 2019, 2:36 PM

Payment details

Statement descriptor	TRUMP VICTORY
Amount	\$1,000.00
Fee	\$0.00
Net	\$1,000.00
Status	Succeeded
Description	No description <div><div></div>Edit</div>

Payment method

ID	Sylwia Manchanda		
Number	•••• 1644	Address	
Fingerprint			
Expires	New York, NY, 10023		
Type	Origin	United States <div><div>US</div></div>	
	CVC check	Passed ✓	
	Street check	Passed ✓	
	Zip check	Passed ✓	

Session

USER AGENT

Operating system iOS 12.3.1

Browser Mobile Safari

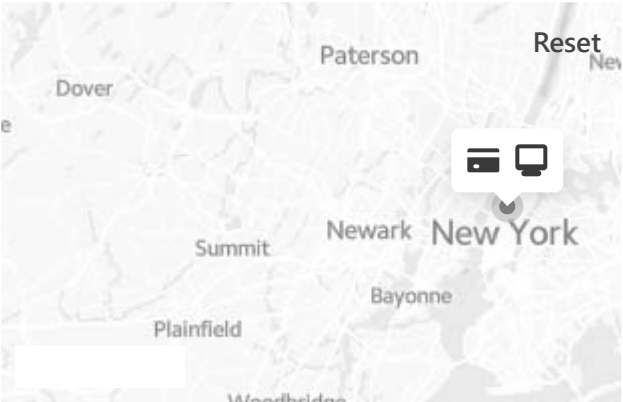
Device iPhone

LOCATION

Device IP address

Card billing address

Distance 1 mile



Metadata

Mailing Address

Zip Code 10023

State NY

City New York

Email

Last Name Manchanda

First Name Sylwia

Employer retired

Occupation retired

Source URL

Source Code

Recurring Gift FALSE

Batch Revv

Fund Code TVICT

additional_metadata {"Donation Drive":"Trump Victory Bedminster- Low Dollar ","Donation Type":"Regular Donation"}

revv_uid	rv_ch_JptkNGRSj9Z7g5j1tLrQWC8U
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Connections

Payout	po_1EuqrHJzJZUj6TXt8iMuHoJL
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Receipt history

No receipts sent

Logs

200 OK	POST /v1/charges/ch_1EukeYJzJZUj6TXtj1e5pC0x	7/10/19, 2:36:35 PM
200 OK	POST /v1/charges	7/10/19, 2:36:30 PM

Events

A \$1,000.00 USD payment for info@manchanda-law.com was updated	7/10/19, 2:36:35 PM
info@manchanda-law.com was charged \$1,000.00 USD	7/10/19, 2:36:31 PM

EXHIBIT 3

REDACTED

From: MANCHANDA LAW OFFICE PLLC <info@manchanda-law.com>

Sent: Thursday, May 7, 2020 12:42 PM

REDACTED

Subject: [EXTERNAL]Re: TVFC

Hello Trump Finance/Victory Team:

You need to fix the etching online for me and Polish national wife Sylwia Manchanda found at <https://docquery.fec.gov/cgi-bin/forms/C00618389/1358511/sa/ALL/4>

My wife never contributed money (she's not even a greencard holder and we are pending her adjustment of status) and I gave \$2000 for myself.

Your staff member placed my wife's name on a seating ticket for the Bedminster Golf luncheon as a favor, but she never contributed.

Plus we don't want our home address online, just my law office was fine.

Please fix amend and clarify this now, otherwise we will have to take legal and equitable action.

Plus at the time me and my wife had no idea that greencard holders or immigrants could not contribute (Adam Lorentzen finally told us this months later when he tried to get us to go to the Hamptons event, which we ended up not going to).

Please fix this now and immediately as me and my wife are going through her greencard adjustment of status process (and they are already giving us problems as we are conservative Republican Trump supporters, surrounded in New York City Manhattan by a sea of liberal left wing socialist communist hater Democrats - as you may know I had to sue the USCIS New York Field Office specifically Immigration Services Officer Andrea Lewis in SDNY case index 1:20-CV-1773 for denying our greencard marriage case (and I am the top NYC immigration lawyer for the past 20 years)!

Kind regards,

Rahul D. Manchanda, Esq.
Manchanda Law Office PLLC
30 Wall Street, 8th Floor
Suite 8207
New York, NY 10005
Tel: (212) 968-8600
Mob:
Fax: (212) 968-8601

Toll Free 24 Hour Hotline: (855) 207-7660
e-mail: rdm@manchanda-law.com
web: <http://manchanda-law.com/attorney-profiles/>

Ranked amongst Top Attorneys in the United States by Newsweek Magazine in 2012 and 2013.

Martindale Hubbell Client Champion Silver 2017 Award Winner.

Better Business Bureau Accredited Business A+ Rating.

Association of American Trial Lawyers Top 100 In New York State.

U.S. News and World Report Listed Lawyer.

Licensed New York State Real Estate Broker.

CLIENT TESTIMONIALS: <http://manchanda-law.com/testimonials/>

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Make A Payment Online At <https://secure.lawpay.com/pages/manchanda-law-office-llc/operating>

REDACTED