

J. KEVIN DRAKE, P.A.
ATTORNEYS AT LAW

**Christal
Dennis** Digitally signed
by Christal
Dennis
Date: 2020.08.14
16:23:03 -04'00'

J. KEVIN DRAKE

WRITER'S E-MAIL
kdrake@drakelawyers.com

1432 FIRST STREET
SARASOTA, FLORIDA 34236
TELEPHONE (941) 954-7750
FACSIMILE (941) 951-1509

August 14, 2020

Federal Election Commission
Office of Complaints
Examination & Legal Administration
Attn: Christal Dennis, Paralegal
1050 First Street, NE
Washington, DC 20463

SENT VIA EMAIL TO: cela@fec.gov

RE: MUR 7766 / Queensgate Homes, Inc. (Vensota Properties)

Dear Christal:

This letter is in response to the letter from Jeff S. Jordan, dated July 31, 2020, directed to my client Queensgate Homes, Inc. I have also received a copy of the subject complaint. I have attached the Designations of Counsel executed by both Queensgate Homes, Inc., and Vensota Properties, Inc.

Our understanding is that the complaint is filed against Florida Country, a registered Florida political committee and that a complaint has not been filed against either Queensgate Homes, Inc., or Vensota Properties, Inc.

In response to the correspondence my client provides the following information for consideration:

1. Vensota Properties, Inc. ("Vensota") is a Florida corporation. The U.S. Federal Employer Identification Number for Vensota is 27-5041769. A copy of the Florida Department of State's detail for Vensota is attached. Also attached is a copy of a letter dated August 13, 2020, from Mary L. King, P.L., which handles the tax filings for Vensota.
2. Vensota owns vacant land in Sarasota County, Florida, but otherwise conducts no other significant or regular business activities.
3. Vensota maintains offices in Sarasota and Lakewood Ranch, Florida.
4. Queensgate Homes, Inc. is a Canadian corporation which, among other things, is the administrative entity for Vensota and other similar entities. Although Queensgate Homes, Inc., issues checks on behalf of Vensota, it is from a segregated account funded solely for the purpose of project expenses related to the project owned by Vensota. No funds go in or out of that account that are not related completely and entirely to Vensota. Queensgate is not itself responsible for the payment of Vensota related expenses, it merely administers the bank

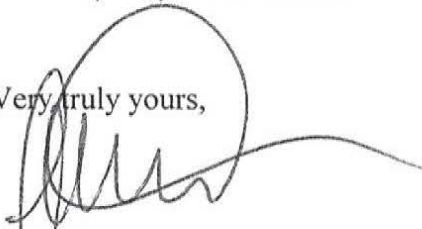
Federal Election Commission
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Page 2

account. Vensota handles the payment of its own expenses from funds provided to it by the project owners.

5. Attached is a copy of the check representing the contribution of \$2500.00 to Florida Country. The full name of the payor on the check is Queensgate Homes, Inc. (Vensota Properties).
6. The ledger initially filed by Florida Country in accordance with its reporting requirements referred to the subject contribution as being made by Queensgate Homes, Inc., without indicating the account designation of Vensota Properties. We understand that the filing has now been corrected by Florida Country.

It was certainly not the intention of Queensgate Homes, Inc., to violate the Federal Election Campaign Act or any election laws relative to contributions. If there was a technical violation, it was entirely inadvertent and unintentional, and was simply a matter of how the management of the various accounts are handled. For these reasons, and based on the facts recited above, we believe that no action should be taken against Queensgate Homes, Inc., in this matter.

Very truly yours,



J. KEVIN DRAKE

JKD/tlp
Enclosures
cc: client
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FEDERAL ELECTION COMMISSION
1050 First Street, NE
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

EMAIL cela@fec.gov

FAX 202-219-3923

AR/MUR/RR/P-MUR# 7766

Name of Counsel: J. Kevin Drake

Firm: J. Kevin Drake, P.A.

Address: 1432 First Street

Sarasota FL 34236

Office#: (941) 954-7750 Fax#: (941) 951-1509

Mobile#:

E-mail: kdrake@drakelawyers.com

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.

8/14/2020
Date

[Signature]
(Signature - Respondent/Agent/Treasurer)

FAUSTO PACOMBO
(Name - Please Print)

President
Title
Queensgate Homes, Inc.

RESPONDENT: Queensgate Homes, Inc.
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 400-3800 Steeles Ave. W
(Please Print)

Woodbridge, ON L4L 4G9

Home#: Mobile#:

Office#: 905-851-5000 Fax#:

E-mail: lauren@queensgatehomes.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.

Rev. 2018



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1050 First Street, NE
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STATEMENT OF DESIGNATION OF COUNSEL

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FAX 202-219-3923

AR/MUR/RR/P-MUR# 7766

Name of Counsel: J. Kevin Drake

Firm: J. Kevin Drake, P.A.

Address: 1432 First Street

Sarasota FL 34236

Office#: (941) 954-7750 Fax#: (941) 951-1509

Mobile#:

E-mail: kdrake@drakelawyers.com

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.

8-14-20

Date

(Signature - Respondent/Agent/Treasurer)

Managing Director
Vensota Properties, Inc.
Title

Fabian Bianchi

(Name - Please Print)

f.bianchi@verizon.net

RESPONDENT:

Queensgate Homes, Inc.
(Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 400-3800 Steeles Ave. W
(Please Print)

Woodbridge, ON L4L 4G9

Home#: _____ Mobile#: _____

Office#: 905 851 5000 Fax#: _____

E-mail: lauren@queensgatehomes.com

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Detail by Entity Name

Florida Profit Corporation
VENSOTA PROPERTIES, INC.

Filing Information

Document Number P10000095481
FEI/EIN Number 27-5041769
Date Filed 11/22/2010
State FL
Status ACTIVE

Principal Address

11523 PALM BRUSH TRAIL, #417
LAKEWOOD RANCH, FL 34202

Mailing Address

11523 PALM BRUSH TRAIL, #417
LAKEWOOD RANCH, FL 34202

Registered Agent Name & Address

J. KEVIN DRAKE, P.A.
1432 FIRST STREET
SARASOTA, FL 34236

Officer/Director Detail

Name & Address

Title D

PALOMBO, FAUSTO
3800 STEELES AVE., WEST, SUITE 400
WOODBIDGE, ONTARIO L4L 4G9 OC

Title Director

Bianchi, Fabian
11523 PALM BRUSH TRAIL, #417
LAKEWOOD RANCH, FL 34202

Annual Reports

Report Year	Filed Date
2018	04/29/2018
2019	04/24/2019
2020	06/29/2020

Document Images

06/29/2020 -- ANNUAL REPORT	View image in PDF format
04/24/2019 -- ANNUAL REPORT	View image in PDF format
04/29/2018 -- ANNUAL REPORT	View image in PDF format
04/30/2017 -- ANNUAL REPORT	View image in PDF format
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04/29/2014 -- ANNUAL REPORT	View image in PDF format



3389 Magic Oak Lane
Sarasota, Florida 34232
Office: (941) 906-7585 Facsimile: (941) 906-7586

♦*IRS Problem Resolution* ♦*Tax Return Preparation*

August 13, 2020

Re: Vensota Properties Inc

To Whom It May Concern,

I am an Enrolled Agent that has prepared the 2016, 2017, 2018 and 2019 Federal and State tax returns for Vensota Properties Inc, a Florida Corporation with EIN 27-5041769

Please contact me if any additional information is required.

Sincerely,


Christopher D Johnsen

QUEENSGATE HOMES INC.
(VENSOTA PROPERTIES)
400-3800 STEELES AVE. W.
WOODBRIIDGE, ONTARIO L4L 4G9

U.S. DOLLAR ACCOUNT

000121

DATE 20 20-04-00
Y Y Y Y M M D D

PAY to Florida County \$ 2500.00
the order of
Two thousand five hundred XX DOLLARS 
100 U.S. FUNDS



CANADIAN IMPERIAL BANK OF COMMERCE
2340 FINCH AVE. W.
NORTH YORK, ONTARIO M9M 2C7

QUEENSGATE HOMES INC.
(VENSOTA PROPERTIES)

RE _____

PER *J. P. [Signature]*