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**From:** [Alejandro J. Figueroa](#)  
**To:** [CELA](#)  
**Subject:** MUR 7772  
**Date:** Monday, August 24, 2020 5:53:10 PM  
**Attachments:** [FPI - FEC Response 08.24.20v1.pdf](#)

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On behalf of Fundación Pro Igualdad, Inc., attached please find a formal request for extension of time to respond to the referenced complaint.

Should you have any questions, please do not hesitate to contact the undersigned

Sincerely,  
AF

**Alejandro J. Figueroa**  
Managing Partner

**Miramar Group, LLC**  
PO Box 10051  
San Juan, PR 00908  
Tel. 787-934-0805

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August 24, 2020

**CONFIDENTIAL – VIA E-MAIL**

Jeff S. ordan  
*Assistant General Counsel*  
Complaints Examination &  
Legal Administration  
Federal Election Commission  
Washington, D.C. 20463  
[cela@fec.gov](mailto:cela@fec.gov)

**E: UR 7772**

Dear Mr. ordan:

We are in receipt of your letter dated August 11, 2020 and have reviewed the frivolous Complaint referenced therein. We have been engaged as counsel to Fundación Pro Igualdad, Inc., ("FPI") in connection with this matter. In light of the circumstances described below, FPI hereby respectfully requests an extension of time to respond and formally request the summary dismissal of the Complaint.

As a threshold matter, it must be stressed that the Complaint must be scrutinized taking into account that it was filed by Mr. Jorge Dávila-Torres, who was the Campaign Director for the gubernatorial primary campaign of Puerto Rico's constitutional governor, Wanda Vázquez-Garced, who lost the primary on August 16, 2020 by a substantial margin. The instant Complaint, as FPI intends to demonstrate, forms part of a campaign of harassment, intimidation and free speech violations against an entity that engaged in constitutionally protected political expression consisting of lawful political donations to a duly registered Super PAC, Salvemos a Puerto Rico. Without any factual support, the Complaint generally and frivolously asserts that FPI and another entity "laundered funds" for Comité Amigos Pedro Pierluisi. This assertion is false and outrageous, since any and all donations executed by FPI are legal in nature and have been duly reported to all corresponding federal and state agencies. There is no evidence to the contrary but only political attacks, retaliation and speculation.

As the undisputed facts show, without any prior notice or due process guarantees, effective on July 10, 2020, the Complainant, r. Jorge Dávila, in his capacity as Campaign Director, issued a press conference in which he alleged that FPI and the Super PAC, Salvemos a Puerto Rico, had undertaken coordinated communications in violation of applicable federal statutes. n that same day, the Secretary of State for the Commonwealth of uerto Rico, who is a direct subordinate of Governor and ex Candidate Wanda Vázquez Garced, notified the cancellation of the corporate registry for FPI. The aforementioned cancellation was executed in clear violation of the entity's due process rights and in contravention of Puerto Rico's General Corporations Act and applicable caselaw. The sole reason for the intervention by the Puerto Rico Department of State in this matter is the fact that FPI had made donations to a Super PAC that was engaged in constitutionally protected speech against Governor Wanda Vázquez Garced. This is tantamount to political persecution and retaliation.

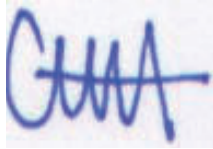
In light of said gross constitutional violations, FPI filed a Request for Preliminary Injunction, a Request for Permanent Injunction and Complaint for Declaratory Judgement in State Court (San uan, PR) against the Puerto Rico State Department and the Secretary of State. FPI alleges that Department of State illegally, arbitrarily and capriciously canceled the Certificate of Incorporation of the FPI, said government action having the intention and/or effect of illegally suppressing the legitimate exercise of freedom of political expression that FPI holds, in accordance with the prevailing constitutional order. The Complaint requests the immediate restoration of FPI's Corporate Registry and an injunction against the Department of State for purposes of avoiding additional retaliation. Additionally, FPI alleges violations of its constitutional free speech rights, since the Department of State executed the adverse actions solely as a result of its involvement in the opposition campaign against the Governor.

The San Juan Superior Court scheduled an Injunction hearing on the aforementioned matter for Wednesday August 26, 2020 at 1:30 . The undersigned counsel respectfully understands that the outcome of the aforementioned state court legal action is highly relevant for purposes of the legal defenses that FPI intends to raise in the instant proceeding, since it will show (i) that the Puerto Rico Government has taken retaliatory and unconstitutional adverse actions against FPI merely for the reason that the entity exercise its right to freedom of expression consisting of making lawful political donations to a Super PAC, and (ii) the frivolous Complaint filed by r. Dávila before the FEC is part of said retaliation.

In view of the importance of the state court action to an adequate response on FPI's part to the referenced Complaint, we respectfully request that an extension of time to respond be granted until the uerto Rico San uan Superior Court has issued a ruling on the requested legal remedies. The undersigned counsel wil promptly inform the Federal Elections Commission about any ruling in the case.

The present request is filed in good faith, without any intent to delay and with the sole purpose of guaranteeing FPI's rights.

Sincerely,

A handwritten signature in blue ink, appearing to read 'AJF', is positioned above the typed name and title.

Alejandro J. Figueroa  
Counsel to Fundación Pro Igualdad, Inc.



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](mailto:cela@fec.gov)

FAX 202-219-3923

AR/MUR/RR/P-MUR# MUR 7772

Name of Counsel: Alejandro J. Figueroa

Firm: Miramar Law Group

Address: P. O. Box 10051

San Juan, PR 00907

Office#: 787-434-0805 Fax#: N/A

Mobile#: \_\_\_\_\_

E-mail: ajfigueroa@miramargroupllc.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.

<u>08-24-20</u>		
Date	(Signature - Respondent/Agent/Treasurer)	Title
	<u>ALVARO PILAIZ</u>	
	(Name - Please Print)	

**RESPONDENT:** Fundación Pro Igualdad, Inc.  
(Please print Committee Name/Company Name/Individual Named in Notification Letter)

Mailing Address: P. O. Box 10145  
(Please Print)

San Juan, PR 00908

Home#: \_\_\_\_\_ Mobile#: \_\_\_\_\_

Office#: 787- Fax#: \_\_\_\_\_

E-mail: Fundacionproigualdad@gmail.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.