RECEIVED
By OGC/CELA at 9:47 am, May 23, 2024

JOHN E. CHAPMAN

Attorney at Law

Cuyahoga Falls, Ohio 44223

May 20, 2024

Federal Elections Commission
Office of Complaints Examination
& Legal Administration
Attn Wanda Brown, Assistant General Counsel
1050 First Street, NE
Washington, DC 20463

RE: THE REPUBLICANS OF NORTHEAST OHIO

MUR 8224

To Whom it May Concern:

Action Committee (PAC) and Mr. Edward Davidian. Attorney Corinne Hoover filed a complaint to the Federal Elections Commission alleging that the PAC has violated sections of the Federal Elections Campaigns Act. It is important to note that in December Attorney Hoover previously targeted Mr. Davidian by making false allegations of violations of Ohio Law. Those allegations were reviewed by the Summit County Board of Elections in January of 2024 and found to be without merit. The letter sent to Mr. Davidian from the Commission was dated March 7, 2024; however, he did not receive it until May 9 with the envelope it was mailed in dated May 8, 2024. Mr. Davidian promptly contacted counsel and respectfully requests that you accept this response.

First, the PAC did send out a mass mailing to several thousand registered voters prior to the Ohio Primary. The mailing consisted of a candidate slate card that included the names of 24 candidates of whom three were candidates for Federal Office. Those three were Donald Trump for President, Frank LaRose for Senate, and Chris Banweg, for the House of Representatives. The candidate names were printed solely on one side of the card and the other side contained the name of the PAC, a general admonishment to vote, decorative coloring, and standard mail information such as the address of the recipient and the name of the PAC. Less than 1/3 of the total space of the candidate side of the card was devoted to the Federal three races.

There are two complaints at issue here. First, that Mr. Davidian did not register the PAC as a Federal Political Action Committee. Please note that Mr. Davidan and his PAC are registered with the State of Ohio and that he has filed all required expenditure forms. Mr. Davidian believes that the PAC's slate card does not exceed the threshold required to mandate that he register as a Federal PAC.

The documentation enclosed includes an Ohio Campaign Finance Report submitted by the PAC dated March 7, 2024. The report includes an expenditure of \$4,704.16 to the United States Postal Service for the postage and mailing of the slate card. The second document is a receipt for the printing of the slate card using Vista Print in the amount of \$2,627.64. The total expenditure according to Mr. Davidian and the PAC in this filing was \$7,328.80. Since the total space used to support the Federal candidates was approximately twelve percent, Mr. Davidian believes that he did not exceed the \$1,000.00 contribution threshold.

The second complaint was that the PAC did not include the required disclaimer on the mailer. The slate card clearly identifies the name of the PAC and has the disclaimer mandated by Ohio law, but it does not contain the language required by Federal law. As previously stated, Mr. Davidian believes that this expenditure did not trigger the reporting requirements and did not require anything other than the standard disclaimer and reporting contained in Ohio Law.

Should the Commission disagree with Mr. Davidian and the PAC and find him in violation of either or both Federal requirements, Mr. Davidian accepts their conclusions and will make every effort to correct his future conduct. On the advice of counsel Mr. Davidian will register his PAC so that, should he wish to continue in his advocacy in Federal Elections, he will be able to do so. Mr. Davidian has principally confined his political activities to local elections as a volunteer in many local campaigns helping put up signs and knock on doors. Only in recent years has he ventured into creating a Political Action Committee to support local candidates and did not see the harm in including three names of Federal candidates alongside twenty-one others. Aside from Attorney Hoover's prior false allegations at the local level, Mr. Davidian has no prior misconduct and will be diligent and with the advice of counsel (if needed) make sure that he conforms to Federal rules. Mr. Davidian and the PAC diligently reported their expenditures as required by Ohio law and there was no intent to deceive or conceal their activity. Mr. Davidian respectfully asks that the Commission consider this should they find him in violation.

Sincerely,

John E. Chapman, 0075653

fort & bype

Attorney at Law

Cuyahoga Falls, Ohio 44223



FEDERAL ELECTION COMMISSION 1050 First Street, NE Washington, DC

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

E-MAIL: cela@fec.gov

AR/MUR/RR/P-MUR# 8224
Name of Counsel: John Chapman
Name of Counsel: John Chapman Firm: John E. Chapman Attorney at Law
Address:
Cuyahoga Falls, Ohio 44223
Office#: Fax#:
Mobile#: 330-730-7626
E-mail: <u>Chapmalan & gmailicom</u>
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.
Date (Signature - Respondent/Agent/Treasurer) FOUR Please Print) TREAS Title (Name - Please Print)
RESPONDENT: The Republicans of Noathean On' (Please print Committee Name/ Company Name/Individual Named in Notification Letter)
Mailing Address: 1168 INVER NECS LANE (Please Print) Spow Oh 44224
Home#: 330 620568 Mobile#:
Office#: Fax#:
E-mail:

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. 2023

Your order is confirmed

VistaPrint <no-reply@t.vistaprint.com> Wed 1/31/2024 9:49 AM To:Susan Truby <sltruby@msn.com>

Order Confirmation



Thanks for your order, Susan.

We're processing it now and we will let you know when it's on its way.

Expected delivery: Monday, February 12, 2024

Check order status

Order details

Order number VP_09MFL0FM

Order date Wednesday, January 31, 2024

Speed Standard Shipping address

Edward Davidian 1168 Inverness Lane Stow, OH 44224-2277 United States

Billing address

Edward Davidian 1168 Inverness Lane Stow, OH 44224-2277 United States

Order summary

Postcards

\$2,461.49

13

Quantity: 20000

Expected delivery: Mon, February 12

Subtotal:

\$2,461.49

Shipping:

\$0.00

Tax:

\$166.15

Total:

\$2,627.64



Need help? Get in touch with our customer care team.

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SUMMIT COUNTY BOARD OF ELECTIONS AKRON, OH 44311

Ohio Campaign Finance Report

Form 30-A

2024 MAR - 7 PM 2: 43

ORC 3517.10

Committee Name				Office Sou	-				District
The Republica	MI OF NOR	TH EAS	TOhio	NIA	2	,	i ^j		
Street Address		City			State	Zip			
1168 INVERNES	SSLANE	ST	000		OH	4	4224		
Candidate Name OR PAC Registratio		Treasurer Name					Election Date (I		
		EDWA	RD DAVID	IAN			03/19/2	1021	+
Type of Report (choose one):		Door R	1000						
Annual Semiannual	Pre-Primary	Post-P	rimary Pre	-General		Pos	t-General		
Statewide Candidates Only:								Year	
☐ July Monthly ☐ Augus	t Monthly 🔲 Sep	tember Mon	thly					20	24
Amended Report Termina	ation		Short Form Re	eport (R.	C. 351	7.10)(H))		
	ck this box if the cornes to terminate with		Check this				e is filing a d instructions		
Wildi	103 to terrimate with	инэ тероге	Short term	report. Se	oc alla	CHE			
1. Amount brought forward	d from last report			-0	<u> </u>				
2. Total monetary contribu	tions (From Forms	31-A and 31-	-E) :	5235,00					
3. Total other income (From	m Form 31-A-2)			3833.91					
4. Total funds available (su	ım of lines 1, 2, 3)			9068,91					
5. Total monetary expendi	tures (From Forms 3	31-B and 31-	F)	8348, 23					
6. Balance on hand (line 4	minus line 5)			726	1,68	3			
7. Value of in-kind contribu	utions received (Fro	om Form 31-	J-1)	-0-					
8. Value of in-kind contribu	utions made (From	Form 31-J-2)		7 U -					
9. Outstanding loans owed	l by committee (Fro	m Form 31-0	C) ,	3000,00				,	ē.
10. Outstanding debts owe	ed by committee (Fr	om Form 31	-N)	4					
11. Outstanding loans owed to committee (From Form 31-K)				~		,5,7,			7, -
12. Value of independent e	xpenditures made	(From Form	31-U)	-	de la				
THIS STATEMENT IS MADE					IE FIF	тн	DEGREE.		
Eduran Gran	mais				0	31	07/202	/	
Signature of Treasurer or Deputy Trea					Date (M	1M/D	D/YYY)		
Contribution Pages	expenditure Pages	Other	Pages	Total Pag	ges		Last U	pdated	I 09/2017



Designation of Treasurer

Form 30-D

R.C. 3517.10

TYPE OF FILING: NEW	UPDATE					*			
COMMITTEE TYPE: Ca	ndidate PAC	PCE	Political Party	Leg	gislative Campai	ign Fund			
If update, please check the a	ppropriate reason(s):								
Change of Committee Name.	Prior Name was:								
Change of Filing Location.		Prior Location was: New Location is:							
Change of Office Sought.	Previous Office Sought: _	Previous Office Sought: New Office Sought:							
Change of Treasurer Info	Designation or Chang	Designation or Change of Deputy Treasurer Info							
Change of address/phone/email f	,,		O Deputy Treasur	er () Candidate				
Other Please Explain:									
All Committees									
Full Name of Committee	1,		101		PAC # (if Upda	ated)			
The Republic		MEAST	ONTO	-,,					
Street Address 1168 INVEL	. /0110	STO	. 0	State	^{Zip} 44224	L			
Telephone	ness LANE	Email							
330-620-50	668	EHI	05777 AN	SNIC	ion				
Treasurer EAWARD DAV		Telephone 330620	F	mail	T774MSN	J. com			
Street Address 1168 INVERNE)	City	w		zip 44224				
Deputy Treasurer (if any)		Telephone		mail					
Street Address		City		State	Zip				
Oli Cott / Idai Coo		·		Otate	2.10				
Candidate Committees	Only								
Full Name of Candidate			Email						
Street Address		City		State	Zip				
		0.00							
Office Sought	Subdivision/Distric	et	Party Affiliation	n/Independ	ent/Non-Partisan El	lection Year			
Political Action Commi	ttees Only								
	Sponsored, Name the Sponsor			Ac	ronym Used (if any)				
Corporation	DAG ::								
O Corporation If E Not Sponsored	Ballot Issue PAC, list issue								
Is this a Ballot Issue PAC	List any A	ffiliated PACs/PCEs	×						
O Yes O No	Cs and PCEs Only								
Evous Muce	- 03/07/202	Jz [***************************************						
Signature of Treasurer or Deputy Treas		Signature of Ca	andidate or Authorize	d Party	Date (MM/DD/				

Last Updated 09/2019



Statement of Contributions Received

Form 31-A

ORC 3517.10

Full Name of Committee				
^				
The REPubliCANS OF	- NORTHEA	ST Ohi	D	
Full Name of Contributor		Re	gistration Numbe	er, if PAC
Robart OF Ohio				
Street Address	Employer/Occupation/Labor Or	ganization*		Form (Cash, Check, etc.)
	Retired			check
City	State Zip Code	Date (MM/DD/Y	YYY)	Amount
Cuyahoga Fulls	04 44223	02/21/2	2024	1000.
Full Name of Contributor			gistration Numbe	
Glosia Rogers				
Street Address	Employer/Occupation/Labor Or	ganization*		Form (Cash, Check, etc.)
	RETIRED State Zip Code			chelek
City	State Zip Code	Date (MM/DD/Y	YYY)	Amount
STOW	OH 44224	02/21/	2024	1000,00
Full Name of Contributor		Re	gistration Numbe	r, if PAC
Capol Lackey			2	
Street Address	Employer/Occupation/Labor Or	ganization*		Form (Cash, Check, etc.)
	Retined State Zip Code			chelesc
City	State Zip Code	Date (MM/DD/Y	YYY)	Amount
STOW	014 44224	02/20/2	2024	1200.00
Full Name of Contributor		The second secon	gistration Numbe	r, if PAC
Cychasse Rep Club				
Street Address	Employer/Occupation/Labor Or	ganization*		Form (Cash, Check, etc.)
				chelek
City	State Zip Code	Date (MM/DD/Y)		Amount
Cupahoga Falls	OH 44223	02/09/	2024	°550,
Full Name of Contributor			gistration Numbe	
HUDSON REP Club				
	Employer/Occupation/Labor Or	ganization*		Form (Cash, Check, etc.)
				check
City	State Zip Code	Date (MM/DD/Y)	YYY)	Amount
Faiolawn	OH 44333	02/21/2	024	500

*Required for contributions from individuals over \$100 to statewide and general assembly candidates. If contributor is self-employed, the occupation and the name of the individual's business, if any, rather than employer should be listed. If two or more employees contribute via payroll deduction and exceed the aggregate of \$100, the labor organization of which the employees are members, if any, must also appear. [R.C. 3517.10(B)(4)]

Page Total 4250



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Page ___

Statement of Contributions Received

Form 31-A

				ORC 3517.10
Full Name of Committee				
The Republicans OF	NORTHEAST	Ohio		
Full Name of Contributor			Registration Numb	per, if PAC
Dan Cannahan				
Street Address	Employer/Occupation/Labor O	rganization*		Form (Cash, Check, etc.)
	Kerired			Check
City	State Zip Code	Date (MM/DD	D/YYYY)	Amount
HUDSON	DH 44236	02-0	1-2024	100
Full Name of Contributor			Registration Numb	er, if PAC
Dule Kramer				
Street Address1.	Employer/Occupation/Labor O	rganization*		Form (Cash, Check, etc.)
	Retired			Check
City	State Zip Code	Date (MM/DD		Amount
HUDCON	0H 4423b	02-13	3-2024	100
Full Name of Contributor			Registration Numb	er, if PAC
BEAT D. JOYCE				
Street Address	Employer/Occupation/Labor O	rganization*		Form (Cash, Check, etc.)
8				Check
City	State Zip Code	Date (MM/DD		Amount
Burberton	OH 44203	02-0	01-2024	£100.
Full Name of Contributor			Registration Numb	er, if PAC
JOHN GREVEN				
Street Address	Employer/Occupation/Labor O	rganization*		Form (Cash, Check, etc.)
	State Zip Code			Check-
City	State Zip Code	Date (MM/DD	D/YYYY)	Amount
AKRON	017 44312	02-6	3-2024	100-
Full Name of Contributor			Registration Numb	er, if PAC
Charles Aust				
Street Address	Employer/Occupation/Labor O	rganization*		Form (Cash, Check, etc.)
	Retired			cherell
				at the same of the

*Required for contributions from individuals over \$100 to statewide and general assembly candidates. If contributor is self-employed, the occupation and the name of the individual's business, if any, rather than employer should be listed. If two or more employees contribute via payroll deduction and exceed the aggregate of \$100, the labor organization of which the employees are members, if any, must also appear. [R.C. 3517.10(B)(4)]

DH

Page Total 55000



Page

Statement of Contributions Received

Form 31-A

ORC 3517.10

Full Name of Committee	<i>-</i> λ	1.0-1-61	, - A	650			
The Republicanc of NORTHEAST Ohio							
Full Name of Contributor William Deay				Registration Numb	er, if PAC		
William Dean							
Street Address	Employer	r/Occupation/Labor Or	rganization*		Form (Cash, Check, etc.)		
	Re	27			Checil		
City	State	Zip Code	Date (MM/D	D/YYYY)	Amount		
Full Name of Contributor EDWARD DAVIDIA Street Address Lane City Full Name of Contributor	01+	Zip Code 44224	02/0	3/2024	950		
Full Name of Contributor				Registration Numb	er, if PAC		
EXWARD DAVIDIA	-N			16 ⁻⁷			
Street Address	Employer	/Occupation/Labor Or	ganization*	•	Form (Cash, Check, etc.)		
1168 INVERNESS	D.	etires			Check		
City	State	Zip Code	Date (MM/D	D/YYYY)	Amount		
STOW	OH -	44224	02/2	3/2024	385.00		
Full Name of Contributor		distribution of the control of the c	Assessment of the same	Registration Numb	er, if PAC		
Street Address	Employer	/Occupation/Labor Or	ganization*		Form (Cash, Check, etc.)		
City	State	Zip Code	Date (MM/D	D/YYY)	Amount		
	•						
Full Name of Contributor				Registration Numb	er, if PAC		
Street Address	Employer	/Occupation/Labor Or	ganization*		Form (Cash, Check, etc.)		
City	State	Zip Code	Date (MM/DI	D/YYYY)	Amount		
	~						
Full Name of Contributor Registration Number, if PAC							
-							
Street Address	Employer	/Occupation/Labor Or	ganization*		Form (Cash, Check, etc.)		
City	State	Zip Code	Date (MM/DI	D/YYYY)	Amount		
	¥						

*Required for contributions from individuals over \$100 to statewide and general assembly candidates. If contributor is self-employed, the occupation and the name of the individual's business, if any, rather than employer should be listed. If two or more employees contribute via payroll deduction and exceed the aggregate of \$100, the labor organization of which the employees are members, if any, must also appear. [R.C. 3517.10(B)(4)]

Page Total \$1,435 00



Page

Statement of Other Income

Form 31-A-2

R.C. 3517.10(B)

The state of the s	THE REPORT OF THE PARTY OF THE	the case with the same of the same	THE RESERVE OF THE PARTY OF THE			
Full Name of Committee			<i>a</i> \			
The Republicance of N Full Name of Contributor	ORTHEAST	- Ohio	(PAG)			
Full Name of Contributor		DA	Registration Numb	per, if PAC		
Full Name of Contributor The Republicant of S Street Address 11 BB INVERNESS Lane City	umnit Cou	LATY				
Street Address	Type*	Date (MM/D	DD/YYYY)	Form (Cash, Check, etc.)		
1168 INVERNESSLANE	Refund	2/1/	2024	Dia Depocit		
City	State	Zip Code		Amount		
STOW	ОН	447	24	833,91		
Full Name of Contributor			Registration Numb	er, if PAC		
ESWARD DAVIDIAN Street Address						
Street Address	Type*	Date (MM/C	DD/YYYY)	Form (Cash, Check, etc.)		
Street Address 1168 INVERNESS Lane City	Refund	02/21	1/2029	DIA Delocit Amount 60/		
City	State	Zip Code		Amount oof		
STOW	он	442	224	3000/		
Full Name of Contributor Registration Number, if PAC						
Street Address	Type*	Date (MM/D	D/YYYY)	Form (Cash, Check, etc.)		
	Refund					
City	State	Zip Code		Amount		
	он					
Full Name of Contributor			Registration Numb	er, if PAC		
				1		
Street Address	Type*	Date (MM/D	D/YYYY)	Form (Cash, Check, etc.)		
	Refund					
City	State	Zip Code		Amount		
	он			4		
Full Name of Contributor			Registration Numb	er, if PAC		
Street Address	Type*	Date (MM/D	DYYYY)	Form (Cash, Check, etc.)		
	Refund					
City	State	Zip Code	A CONTRACTOR OF THE STATE OF TH	Amount		
	он					
	AND DESCRIPTION OF THE PERSON	September 1990				

Page Total \$ 3833,91

^{*} Place the two letter code in the Type block (one letter per square) which indicates the nature of the Other Income Received; RE for a refund, uncashed check or the committee's own insufficient funds check received. IN for any investment or interest income earned by the committee, SA for the sale of committee assets, or LN for payments received on a loan made.



Page ___

Statement of Expenditures

Form 31-B R.C. 3517.10

Full Name of Committee	ented for the section of the health of the section of the fire of the				
The REPubliCANC OF NORTH	EAST	Thi	O		
To Whom Paid	and the same of th		Date (MM/DD/YYYY)	1	Amount
FIFTH THIRD BANK			02/14/2024		36,99
Street Address	Purpose		1,920.00		V 2 - W - MI - MI
gt 911 GRaham Rd	Cheek	BE	OK		
,	State	Zip	Joue		Number
STOW	он 🕖	4	4224	Di	iReet With draw
To Whom Paid			Date (MM/DD/YYYY)		mount
Labele + Letters					557,08
Street Address	Purpose				
1533 Commerce DR	Lab	eli	Ode Code		
City					Number
STOW	он	1	4224	10	02
To Whom Paid	·		Date (MM/DD/YYYY)		mount
USPS			02/22/2021	4	4704,16
Street Address	Purpose		- Company		
3900 Darrow Rd	POST	TA	5E	Ĭ.	
	State	Zip (Number
STOW	ОН	4	Pate (MM/DD/YYYY)	/	0/
To Whom Paid			Date (MM/DD/YYYY)	A	mount (10)
Citi Bank Visa			03/04/2024	+	3 050.
	Purpose				
P.O. Box 79 0046	MRIN	TI	16 + STAMS	>	
	State	Zip C	Code		Number
ST. Louis	OH MO	k	3179	/	03
To Whom Paid			Date (MM/DD/YYYY)	Ai	mount
Street Address	Purpose				
City	State	Zip C	Code	Check	Number
	он				

Page Total \$ 8348, 23



Page ____

Statement of Loans Received

Form 31-

D C 2517 1

				R.C. 3517.10
Full Name of Committee		ACCOMMON PROPERTY OF A STATE OF THE ASSESSMENT		
The Republicans of i	NORTHEAST C	PhiD		
From Whom Received			Prior Amount	Amt. Incurred this Period
EDWARD DAVIDIAN				43000
Street Address	ANE			Outstanding Balance
1168 INVERNESC City State Zip Code PAP 44224	Loans Received T	his Period	Payme	nts This Period
Date Loan was Originally Incurred (MM/DD/YYYY)	Date of Loan (MM/DD/YYYY)	Amount	Date of Payment (Mi	M/DD/YYYY) Amount
02/21/2024	02/21/2024	3000.00		
Registration Number, if PAC	Date of Loan (MM/DD/YYYY)	Amount	Date of Payment (MI	M/DD/YYYY) Amount
Employer/Occupation/Labor Organization* Retiked	Date of Loan (MM/DD/YYYY)	Amount	Date of Payment (MI	M/DD/YYYY) Amount
From Whom Received			Prior Amount	Amt. Incurred this Period
Street Address				Outstanding Balance
City State Zip Code	Loans Received Ti	nis Period	Payme	nts This Period
Date Loan was Originally Incurred (MM/DD/YYYY)	Date of Loan (MM/DD/YYYY)	Amount	Date of Payment (Mi	M/DD/YYYY) Amount
Registration Number, if PAC	Date of Loan (MM/DD/YYYY)	Amount	Date of Payment (MM	M/DD/YYYY) Amount
Employer/Occupation/Labor Organization*	Date of Loan (MM/DD/YYYY)	Amount	Date of Payment (MM	M/DD/YYYY) Amount
*Required for contributions from individuals over \$100 to state name of the individual's business, if any, rather than employer aggregate of \$100, the labor organization of which the employer if a loan is forgiven, write "Forgiven" in the "Outstanding Balan (Form No. 31-A-2). Transfer total of all payments made in this Cover page (Form No. 30-A).	should be listed. If two or more e ees are members, if any, must al ce" space. Transfer total of all loa	employees contribused appear. [R.C. and received this	oute via payroll deduct 3517.10(B)(4)] period to the Stateme	ction and exceed the
Total Prior Amount \$ 3000				
Total Received This Period \$ 3000 60		ord on Form 31-A	-2)	
Total Payments Received this Period \$ 3000	(also reco	rd on Form 31-B)		
Total Outstanding Balance \$ 3000		rd on Form 30-A)		