

**RECEIVED**

By OGC/CELA at 8:35 am, Jun 17, 2024

**PITTA LLP**

Attorneys at law

120 Broadway, 28<sup>th</sup> Floor  
New York, New York 10271

Tel: (212) 652-3890

Facsimile: (212) 652-3891

**Ardian Tagani, Esq.**  
**Associate**

Direct Dial: (212) 652-3895

[Ardian.Tagani@PittaLaw.com](mailto:Ardian.Tagani@PittaLaw.com)

June 14, 2024

**VIA ELECTRONIC MAIL**

Federal Elections Commission

Office of Complaints Examination and Legal Administration

Attn: Kathryn Ross, Paralegal

1050 First Street, NE

Washington, DC 20463

RE: MUR 8249 – Martin W. Dolan & MartyDolanforCongress

Dear Ms.Wanda Brown:

This firm has been retained as counsel to MartyDolanforCongress (“the Committee”), C00853259, in relation to MUR 8249. On behalf of the Committee, please accept the following as a response to the aforementioned MUR and related complaint submitted by Justice Democrats PAC (“the Complaint”).

Sincerely



Ardian Tagani, Esq.

Cc: Kathryn Ross  
Martin W. Dolan  
Vito R. Pitta, Esq.  
Joshua Beckett-Flores

Federal Elections Commission  
RE: MUR 8249 – Martin W. Dolan & MartyDolanforCongress  
June 14, 2024  
Page | 2

In responding to the MUR and the Complaint, the Committee has identified and corrected some errors in its original April Quarterly Report. The Committee amended its April Quarterly Report on June 6, 2024. The bulk of the Committee's errors were a result of the confusion caused by the changing district lines over the course of the election cycle, as well as relative inexperience with the use of FECfile to submit reports. The Committee apologizes for these mistakes, but does not believe they rise to the level of a violation of the Act or warrant any additional use of FEC time. The Committee has since hired experience staff to assist in filings and has retained counsel.

The Committee addresses each of the paragraphs of the Complaint as follows:

1. Committee accepts the statements made in paragraphs 1 through 3 of the Complaint.
2. Regarding Paragraph 4 of the complaint, the Committee disputes the allegations in part and accepts them in part.
3. Regarding Subparagraph a of Paragraph 4, the Committee accepts that its original April Quarterly Report inaccurately reported the district for which the candidate is campaigning. In responding to the MUR and Complaint and amending its April Quarterly Report, the Committee has corrected this error.
4. Regarding Subparagraph (b)(i) of Paragraph 4:
  - a. The Committee accepts that its original April Quarterly Report used the language "unknown" when employment information for donors was unknown.
  - b. However, the Committee disputes the implication that it was required to affirmatively state that it has requested employment information by using the language "information requested." The Committee is aware of no such requirement and Justice Democrats PAC has cited no such requirement in the Complaint. Rather, 11 CFR § 104.7 requires that the Committee use "best efforts" to obtain information required by the Act. The Committee's ActBlue donation page does state that employment information is required. Moreover, the Committee disputes that a submission that uses the language "unknown" is inherently less valid than one using the language "information requested."
  - c. In responding to the MUR and Complaint and amending its April Quarterly Report, the Committee was able to identify the employment information for donors and has added this information, as reflected in the amended report. This includes the three individuals included in the image included on page 3 of the Complaint. Many of these contributions were made by individuals who are not employed.
5. Regarding Subparagraph (b)(ii) of Paragraph 4, the Committee accepts that its original April Quarterly Report omitted any information in the Name of Employer or Occupation fields in reference to Zar Yakov. In responding to the MUR and Complaint and amending



Federal Elections Commission

RE: MUR 8249 – Martin W. Dolan & MartyDolanforCongress

June 14, 2024

Page | 3

its April Quarterly Report, the Committee identified a typographical error in the entry of the contributor's name and has updated it to now read "Yaakov."

6. Regarding Subparagraph (b)(iii) of Paragraph 4, the Committee accepts that its original April Quarterly Report did not include a first name for contributor Wiesen. In responding to the MUR and Complaint and amending its April Quarterly Report, the Committee has corrected this error and provided Mr. Wiesen's first name, as well as his employment information.
7. Regarding Subparagraph (b)(iv) of Paragraph 4, the Committee accepts that its original April Quarterly Report omitted reference to ActBlue contributions. In responding to the MUR and Complaint and amending its April Quarterly Report, the Committee has corrected this error.
8. Regarding Subparagraph (c)(i) of Paragraph 4 of the Complaint, the Committee accepts that its original April Quarterly Report omitted a purpose for the payment to Common Sense America. In responding to the MUR and Complaint and amending its April Quarterly Report, the Committee has corrected this error to include the purpose.
9. Regarding Subparagraph (c)(ii) of Paragraph 4, the Committee accepts that its original April Quarterly Report aggregated taxis taken via Curb over the course of March 2024. In responding to the MUR and Complaint and amending its April Quarterly Report, the Committee has corrected this error to disclose seven such transactions.
10. Regarding Subparagraph (c)(iii) of Paragraph 4, the Committee accepts that its original report omitted a memo entry for the reimbursement to Parker DeDeker. This was the result of a data entry error related to cash payments for canvassers. In responding to the MUR and Complaint and amending its April Quarterly Report, the Committee has corrected this error to disclose the payments to canvassers.
11. Regarding Subparagraph (c)(iv) of Paragraph 4, the Committee accepts that its original report aggregated cash transactions for multiple canvassers. In responding to the MUR and Complaint and amending its April Quarterly Report, the Committee has corrected this error to disclose the payments to canvassers.
12. Regarding Subparagraph (c)(v) of Paragraph 4, the Committee accepts that its original April Quarterly Report omitted a purpose for the March 26, 2024 payment to Federal Express. In responding to the MUR and Complaint and amending its April Quarterly Report, the Committee has corrected this error to include the purpose.
13. Regarding Subparagraphs (c)(vi) and (c)(vii) of Paragraph 4, the Committee accepts that its original April Quarterly Report omitted a purpose for the each identified transactions. In responding to the MUR and Complaint and amending its April Quarterly Report, the Committee identified these as payments to a different vendor, and has corrected the report accordingly. The correct vendor is NY Campaign Strategies.

Federal Elections Commission

RE: MUR 8249 – Martin W. Dolan & MartyDolanforCongress

June 14, 2024

Page | 4

14. Regarding Subparagraph (d) of Paragraph 4, the Committee accepts that its original April Quarterly Report disclosed loan repayments to the candidate under Line 20a and did not indicate the repayments as part of Schedule C. In responding to the MUR and Complaint and amending its April Quarterly Report, the Committee has corrected these errors.
15. Regarding Paragraph 5 of the Complaint, the Committee disputes that it “knowingly” or “willingly” violated the Act in any of these instances. In the interest of submitting a report that was as accurate as possible, the Committee submitted the information it possessed at the time, and marked unknown information as such.
16. Regarding Paragraph 6 of the Complaint, the Committee accepts that it failed to provide a full purpose for the transactions identified in Subparagraphs (c)(i), (c)(v), (c)(vi) and (c)(vii) of Paragraph 4. In responding to the MUR and Complaint and amending its April Quarterly Report, the Committee has corrected these errors.
17. Regarding Paragraph 7 of the Complaint, the Committee disputes the allegation of a violation of the Act, since loan repayment information was provided to the FEC, albeit under the wrong line of Schedule B.<sup>1</sup>
18. Regarding Paragraph 8 of the Complaint, the Committee has maintain records of cash transactions. As stated above, in responding to the MUR and Complaint and amending its April Quarterly Report, the Committee has disclosed petty cash activity related to canvassers.<sup>2</sup>

---

<sup>1</sup> See also, *supra* at Paragraph 15.

<sup>2</sup> See also, *supra* at Paragraph 10-11.