

From: Kenneth Maxwell
To: CELA
Subject: FEC Complaint# MUR 7394
Date: Monday, June 04, 2018 4:28:09 PM

The following is offered in response to correspondence received from the FEC date May 31, 2018 and as a follow-up to my telephone conversation with Paralegal Kathryn Ross on June 4, 2018:

Mr. Jeff S. Jordan
Assistant General Counsel
Complaints Examination & Legal Administration
Federal Election Commission
Washington, D.C. 20463

Ref: MUR 7394

Dear Mr. Jordan,

On Monday, June 4, 2018, I received correspondence from your office alleging that the Maxwell Security Group, LLC may have violated the Federal Election Campaign Act of 1971. This allegation stems from a campaign contribution given to a long-time friend, James D. O'Donnell who is currently running for U.S. Congress in New York's Eighteenth District.

By way of explanation, on or about February 21, 2018, I attended a fundraiser for Mr. O'Donnell and wrote a check for \$500.00 from my business checking account in support of his campaign. In mid-May of this year, I learned that the O'Donnell Campaign could not accept corporate checks, a prohibition I was not aware of at the time and I was given a full refund check in the same amount, \$500.00 from the O'Donnell campaign fund account. I subsequently deposited that refund check back into my business account. My initial contribution was in no way an "In-Kind Contribution" and did not represent payment for any services the Maxwell Security Group has provided to the O'Donnell Campaign. It merely represented a personal contribution to a friend of forty years. I have since replaced that initial \$500.00 contribution with personal funds.

I trust that this response meets your requirements and serves as a satisfactory explanation. Please let me know if you need any additional information.

Thank you.

Sincerely,
Ken Maxwell

Kenneth J. Maxwell
Partner
Maxwell Security Group, LLC
Tel: 646.773.1847
ken@maxwellsecuritygroup.com