# Law Offices of

## James J. Temple, Jr., PA CERAL COUNSE

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April 3, 2019

Federal Election Commission
Office of Complaints Examination
& Legal Administration
105 First Street, NE
Washington, DC 20463

Attn: Kathryn Ross

Re: MUR 7582

Dear Ms. Ross:

Enclosed please find the Statement of Designation of Counsel indicating that the undersigned is counsel for the Friends of Ben Jealous campaign. Please accept this letter and the accompanying Affidavit from the Treasurer of the campaign as a response to the Commission's correspondence of March 21, 2019 and the complaint that was attached.

As you can see from the Affidavit and attached Exhibit A, the campaign did not receive any contributions from Candide Group LLC or Aner Ben-Ami. As detailed in the Affidavit the only contribution was from an individual making a personal contribution of twenty-seven dollars (\$27.00) and listed her employer as Candide Group LLC.

We believe that this fully answers all of the issues concerning the complaint from The Patriots Foundation and relating to the Friends of Ben Jealous campaign. Therefore, we believe that no action should be taken by the Commission.

If anything further is needed to respond to the complaint, please feel free to contact me.

Sincerely,

JJT/jjt

cc: Jason Barnard Small Friends of Ben Jealous

Enclosure



#### 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

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The above-named notifications and of 4/3/2019  Date	JAS	Signature	Respondent/A VARD SMA	mission Agent/Tres	and to act o		ehalf befo		nmissio
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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 of investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.

### FEDERAL ELECTION COMMISSION

Re: MUR 7582

#### AFFIDAVIT OF JASON BERNARD SMALL

I, Jason Bernard Small, depose and state as follows:

- 1. I am over eighteen (18) years of age and competent to testify, upon personal knowledge, the matters set forth herein.
- 2 I was and continue to be the Treasurer for the Friends of Ben Jealous political campaign.
- 3. Upon receipt of the March 2, 2019 correspondence from the Federal Election Commission, I directed our compliance and finance staff to review all the campaign's financial documentation and determine if any contributions had been made by Candide Group LLC or Aner Ben-Ami.
- 4. Wanting to do as thorough an inspection as possible, staff reviewed all the 51,523 contributions made to the campaign. They were unable to find any contributions that were made by Candide Group LLC or Aner Ben-Ami. The campaign was able to determine that a Morgan Simon, who listed her employer as Candide Group LLC did make an online Individual contribution of twenty-seven dollars (\$27.00). Attached hereto as Exhibit A is a screen shot documenting that contribution. Moreover, we could find no other contributions that are linked with Candide Group LLC or Aner Ben-Ami then this employee making a personal contribution.

I SOLEMNLY AFFIRM under penalties of perjury that the contents of the foregoing paper are true to the best of my knowledge, information and belief.

JASON SERNARD SMALL

STATE OF MARYLAND COUNTY OF BALTIMORE

This document was acknowledged before me on April 3, 2019,

By Jason Bernard Small to be the principal's act.

Signatur∉ of Notary

My commission expires: 12-28-2022

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