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August 29, 2019

By email to CELA@fec.govJeff S. Jordan
Assistant General Counsel
Complaints Examination & Legal Administration
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

Re: MUR 7631

Dear Mr. Jordan:

I am writing on behalf of respondents De Blasio 2020 and NY Fairness PAC and their respective treasurers in their official capacities, as well as respondent Mayor Bill de Blasio, who variously received the Office of General Counsel's August 7 complaint notification letters on August 13 and 15. Respondents will respond to the complaint and respectfully request an enlargement of time to do so, for the following reasons.

Mayor de Blasio is both the incumbent Mayor of the City of New York and a presidential candidate, and De Blasio 2020 is his authorized committee. NY Fairness PAC is an ongoing New York State political action committee with a volunteer treasurer. In order to research and prepare responses, I will need to confer with and obtain information from a number of individuals who are heavily occupied on campaign, official and other unrelated matters. I am also scheduled for business travel in mid-September and am involved in numerous scheduled and anticipated urgent professional obligations in the near term. And, for both counsel and several individuals who will be consulted, the Rosh Hashanah and Yom Kippur holidays occur in succession at the end of September and early October.

Jeff S. Jordan

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Meanwhile, I am representing these same respondents as well as another federal political committee as respondents in MUR 7634, the complaint in which is related to but different and broader-alleging than the complaint in MUR 7631. (The four respondents in MUR 7634 variously received the Commission's August 14 notification letters between August 20 and 22.) The factual allegations in both complaints pertain to alleged events that occurred earlier this year, so the statute of limitations concerning both MURs will not expire until 2024. It will be most efficient for respondents and the Commission if both complaints are addressed in tandem and on the same schedule, and respondents in MUR 7634 are today making the same request for an enlargement of time within which to respond.

For all of these reasons, the respondents respectfully request an enlargement of time within which to respond until October 11, 2019. That will afford all respondents a full and fair opportunity to respond and will not prejudice the Commission's ability to give these matters timely consideration at this initial stage of the enforcement process.

Please contact me if you have any question about this request. Thank you for your consideration.

Yours truly,



Laurence E. Gold
Counsel for Respondents
De Blasio 2020, NY Fairness PAC
and Mayor Bill de Blasio