



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: The Commission

FROM: Lisa J. Stevenson
Acting General Counsel

BY: Charles Kitcher *CK by JK*
Associate General Counsel for Enforcement

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SUBJECT: MURs 7631, 7634 (De Blasio 2020, *et al.*)

RE: Proposed Factual and Legal Analyses and Conciliation Agreements

On August 11, 2022, the Commission voted to find reason to believe that: (1) Fairness PAC and Herbert Block in his official capacity as treasurer (“Fairness PAC”) violated 52 U.S.C. § 30116(a) by making excessive contributions to De Blasio 2020 and Herbert Block in his official capacity as treasurer (“De Blasio 2020”) and Bill de Blasio with respect to \$123,000 in polling expenses; (2) NY Fairness PAC violated 52 U.S.C. § 30116(a) by making excessive contributions to De Blasio 2020 and Bill de Blasio with respect to \$53,000 in expenditures for travel and consulting services; (3) De Blasio 2020 and Bill de Blasio violated 52 U.S.C. § 30116(f) by accepting excessive contributions from NY Fairness PAC and Fairness PAC; and De Blasio 2020 violated 52 U.S.C. § 30104(a) and (b) and 11 C.F.R. §§ 100.72(a) and 100.131(a) by failing to report \$176,000 in-kind contributions and expenditures.¹ The Commission further authorized conciliation prior to a finding of probable cause to believe and directed the Office of General Counsel to draft appropriate Factual and Legal Analyses and a Conciliation Agreement.²

¹ Cert. (Aug. 12, 2022).

² *Id.*

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