



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

Jin Lee *JK*  
Deputy Associate General Counsel for Enforcement

Peter Blumberg *PGB*  
Assistant General Counsel

Aaron Rabinowitz *AR*  
Attorney

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

**RE:** Proposed Factual and Legal Analyses and Conciliation Agreements

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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.<sup>1</sup> 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.<sup>2</sup>

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<sup>1</sup> Cert. (Aug. 12, 2022).

<sup>2</sup> *Id.*

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