



**FEDERAL ELECTION COMMISSION**  
Washington, DC 20463

August 2, 2022

**VIA ELECTRONIC MAIL**

William B. Canfield III, Esq.  
6723 Whittier Avenue, Suite 201  
McLean, VA 22101  
(703) 891-9988

RE: MUR 7645

Dear Mr. Canfield:

On September 27, 2019, the Federal Election Commission (“Commission”) notified your clients, Rudolph W. Giuliani and Victoria Toensing, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On July 14 and July 26, 2022, the Commission considered the complaints but was equally divided on whether to find reason to believe that Rudolph “Rudy” Giuliani violated 52 U.S.C. § 30121(a)(2) by knowingly soliciting a prohibited foreign national contribution under 11 C.F.R. § 110.20(g), OR knowingly providing substantial assistance in soliciting a prohibited foreign national contribution under 11 C.F.R. § 110.20(h), from Ukrainian President Volodymyr Zelensky. The Commission also considered the allegations that Victoria Toensing violated 52 U.S.C. § 30121(a)(2) by knowingly soliciting a prohibited foreign national contribution under 11 C.F.R. § 110.20(g) OR knowingly providing substantial assistance in soliciting a prohibited foreign national contribution under 11 C.F.R. § 110.20(h) but no motion received the requisite votes for Commission approval. Accordingly, on July 26, 2022, the Commission voted to close the file in this matter.

Documents related to the case will be placed on the public record within 30 days. *See* Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016). A Statement of Reasons providing a basis for the Commission’s decision will follow.

Page 2

MUR 7645 (Rudolph W. Giuliani, *et al.*)

If you have any questions, please contact Aaron Rabinowitz and Nicholas Mueller, the attorneys assigned to this matter, at (202) 694-1476 or [arabinowitz@fec.gov](mailto:arabinowitz@fec.gov) and [nmueller@fec.gov](mailto:nmueller@fec.gov).

Sincerely,

*Mark Shonkwiler*

Mark Shonkwiler  
Assistant General Counsel