



FEDERAL ELECTION COMMISSION
Washington, DC 20463

John Harding
Winston & Strawn LLP
1901 L Street, NW
Washington, DC 20036
jwharding@winston.com

March 17, 2021

RE: MUR 7878
Hal Teitelbaum

Dear Mr. Harding,

On March 12, 2021, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 52 U.S.C. § 30122, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed 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). Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. *See* 52 U.S.C. § 30109(a)(4)(B).

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 694-1574 or jdigiovanni@fec.gov.

Sincerely,

A handwritten signature in black ink that reads "Justine A. di Giovanni". The signature is fluid and cursive.

Justine A. di Giovanni
Attorney, Federal Election Commission

Enclosure:
Conciliation Agreement

In the Matter of)
) MUR 7878
Hal Teitelbaum)
)

This matter was initiated by a *sua sponte* submission (the “Submission”) made to the Federal Election Commission (the “FEC” or “Commission”) by Crystal Run Healthcare, LLP (“Crystal Run”). The Commission found reason to believe that Hal Teitelbaum (“Respondent”) violated 52 U.S.C. § 30122 of the Federal Election Campaign Act of 1971, as amended (the “Act”).

I. The Commission has jurisdiction over Respondent and the subject matter of this proceeding, and this Agreement has the effect of an agreement entered pursuant to 52 U.S.C. § 30109(a)(4)(A)(i).

III. Respondent enters voluntarily into this Agreement with the Commission.

Applicable Law

1. The Act prohibits any person from making a contribution in the name of another or knowingly permitting his or her name to be used to effect such a contribution. 52 U.S.C. § 30122; *see also* 11 C.F.R. § 110.4(b)(1)(i)-(ii). The term “person,” for purposes of the Act and

Commission regulations, includes partnerships, corporations, and other organizations, including partnerships. 52 U.S.C. § 30101(11); *see also* 11 C.F.R. § 110.10.

Facts

2. Crystal Run is a multi-specialty physician partnership that has operated in the Hudson Valley and lower Catskill region of New York State since 1996. Hal Teitelbaum is the founder, Managing Partner, and Chief Executive Officer of Crystal Run.

3. In 2010, Crystal Run began reimbursing its doctors' contributions to federal political candidates that Teitelbaum and other executives determined to be beneficial to Crystal Run. Between September 22, 2010, and September 6, 2016, Crystal Run reimbursed thirty-eight contributions made by seventeen doctors and one doctor's spouse totaling \$46,500. \$14,200 was reimbursed to Teitelbaum.

4. Crystal Run became aware that its practice of reimbursing federal campaign contributions was unlawful in December 2017. On March 8, 2018, Crystal Run filed its Initial Submission with the Commission.

V. Respondent violated 52 U.S.C. § 30122 by permitting his name to be used for contributions made by Crystal Run.

VI. Respondent will take the following actions:

1. Pay a civil penalty to the Commission in the amount of one thousand five hundred dollars (\$1,500), pursuant to 52 U.S.C. § 30109(a)(5)(A).

2. Cease and desist from violating 52 U.S.C. § 30122.

3. Waive the right to any refund from the recipient committees of any and all of its contributions referenced in this Agreement, and request that the recipient committees disgorge to the United States Treasury all such contributions.

VII. The Commission, on request of anyone filing a complaint under 52 U.S.C. § 30109(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this Agreement. If the Commission believes that this Agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This Agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire Agreement.

IX. Respondent shall have no more than thirty (30) days from the date this Agreement becomes effective to comply with and implement the requirements contained in this Agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written Agreement shall be enforceable.

FOR THE COMMISSION:

Lisa J. Stevenson
Acting General Counsel

BY: Charles Kitcher
Charles Kitcher
Acting Associate General Counsel for Enforcement

3/16/21
Date

FOR THE RESPONDENT:

John W. H. Harding
John W. H. Harding
Attorney for Hal Teitelbaum

02/18/2021
Date