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September 26, 2022

## By E-mail

WFP National PAC Alexander Rabb, Authorized Representative

## FINAL BOARD DETERMINATION - EC2021 INDEPENDENT SPENDER

The New York City Campaign Finance Board ("Board"), at a meeting held on September 15, 2022, made the following final determination concerning WFP National PAC:

## **Violations and Penalties**

The Board determined that WFP National PAC violated the New York City Charter and Board Rules and that the Independent Spender, WFP National PAC, and its Authorized Representative, Alexander Rabb, are jointly and severally liable for paying \$27,000 in penalties as follows:

A penalty of \$27,000 for failure to report contributions. *See* Board Rule 14-02(d). In its reporting to the New York State Board of Elections, the Spender reported four contributions totaling \$707,000 that are not reflected in its disclosure filings to the CFB: Maggie Williams (\$5,000 received June 29, 2021), TIDES ADVOCACY (\$500,000 received October 5, 2021), Working Families Organization (\$200,000 received October 15, 2021), and New York Nurses Association (\$2,000 received November 1, 2021). The contributions were reportable to the CFB, but the Spender did not disclose them. The Board assessed a penalty of 10% of the Spender's total expenditures, capped at the lesser of the statutory maximum of \$10,000 or the amount of the contribution, for each contribution.

## The Board determined that the amount due is \$27,000.

You must pay to the Board the full amount due of \$27,000 no later than October 26, 2022. Checks should be made payable to the "New York City Election Campaign Finance Fund," and mailed to the attention of Joseph Gallagher, Senior Counsel, New York City Campaign Finance Board, 100 Church Street, 12<sup>th</sup> Floor, New York, NY 10007 or delivered to the offices of the Board.

If the Board is not in receipt of the full \$27,000 by October 26, 2022, the Independent Spender's name and the unpaid amount will be posted on the Board's Website and the Board may initiate a civil action against the Independent Spender and its Authorized Representative to compel payment.

You may challenge this final determination, within four months, in the New York State Supreme Court pursuant to Article 78 of the Civil Practice Law and Rules.

If you need additional time to pay this amount or if you have any questions concerning this Final Board Determination, please contact Joseph Gallagher, Senior Counsel, at (212) 409-1865 or <a href="mailto:IGallagher@nyccfb.info">IGallagher@nyccfb.info</a>.

Bethany Perskie General Counsel

NEW YORK CITY CAMPAIGN FINANCE BOARD