



November 1, 2019

Risa S. Sugarman
Chief Enforcement Counsel
Division of Election Law Enforcement
NYS Board of Elections
40 North Pearl Street
Albany, NY 12207

Dear Ms. Sugarman,

It has come to the attention of the Friends of Mark Poloncarz campaign that the Friends of Lynne Dixon campaign (filing ID C49896) has recently made a large purchase of television ad time. While this alone does not raise red flags, as this is common in the last days of a campaign, what is of great concern is that her 11 Day Pre-General Filing reported \$16,839.61 cash on hand. She also reported an additional \$14,000 total in 24 Hour reporting contributions, bringing her total cash on hand to \$30,839.61.

Since that filing, Friends of Lynne Dixon has purchased ad time in the amount of \$110,922.00. This would have to mean that she has spent every single dollar in her campaign account on TV ads alone plus an additional \$80,082.39. Where did that additional, unreported \$80,082.39 come from? In addition, it is unlikely that every last dollar of the campaign is allocated to TV ads alone. Digital ads and other campaign expenses such as office expenses, food for volunteers and all other costs associated with running a county wide campaign must be paid for from this account.

Where is this additional money flowing from and why is it not reflected in the 24-hour filings? It seems to this campaign that to raise that much money in such a short period of time, when your past fundraising has mostly been small donors, that getting such a large an influx of cash would trigger the \$1,000 threshold of 24-hour reporting rule.

The rules of the New York State Board of Elections are in place to stop these kinds of last minute, dark money contributions to candidates. As stated in the New York State Board of Elections Campaign Finance Handbook, "These notices are required because without them there would be no public disclosure of large loans or contributions received during the period leading up to Election Day."

We ask you to look into this matter, as time is of the essence. We are five days away from Election Day and voters deserve and have the right to know who is funding the candidates they might be voting for November 5th.

Sincerely,

Jennifer Hibit

Jennifer Hibit
Campaign Manger
Friends of Mark Poloncarz