



Summary of Final Board Determination

Everly Brown

Candidate, 2013, Borough President, Queens

Program participant: \$0 in public funds received

1. Failing to provide bank account statements \$39

Campaigns are required to provide copies of all bank and merchant account statements for accounts used for each election. *See* Admin. Code §§ 3-703(1)(d), (g), (11); Board Rule 4-01(f).

The Campaign failed to submit any statements for its Bank of America account.

The Board assessed a penalty of \$39 for this violation.

2. Failing to demonstrate compliance with cash receipts reporting and documentation requirements \$17

Campaigns are required to report all cash receipts, deposit them into the bank account listed on the candidate's filer registration and/or certification, and provide the deposit slips for the account to the Board. *See* Admin. Code §§ 3-703(1)(d), (g), (6), (10), (11), (12); Board Rules 1-04(a), (b), 2-06(a), 3-03(c), 4-01(a), (b)(1), (3), (f).

The Campaign reported \$385 in cash receipts but the deposit slips account for \$1,210 in cash receipts, a difference of \$825 (a variance of over 100%).

The Board assessed a penalty of \$17 for this violation.

3. Failing to demonstrate compliance with reporting requirements for receipts \$78

Campaigns are required to demonstrate compliance with the reporting requirements and are required to provide bank records, including bank statements and deposit slips. *See* Admin. Code §§ 3-703(1)(d), (g), (6), (11), (12); Board Rules 1-09, 3-03(c), (d), (e), 4-01.

The Campaign reported \$1,701 in receipts but the bank statements show \$4,116.31 in receipts, a difference of \$2,415.31 (a variance of over 100%).

The Board assessed a penalty of \$78 for this violation.



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4. Failing to demonstrate compliance with reporting requirements for disbursements. \$78

Campaigns are required to demonstrate compliance with the reporting requirements and are required to provide bank records, including bank statements and deposit slips. *See* Admin. Code §§ 3-703(1)(d), (g), (6), (11), (12); Board Rules 1-09, 3-03(c), (d), (e), 4-01.

The Campaign reported \$215 in disbursements but the bank statements show \$4,446.31 in disbursements, a difference of \$4,231.31 (a variance of over 100%).

The Board assessed a penalty of \$78 for this violation.

5. Failing to file disclosure statements. \$3,816

Campaigns are required to file complete and timely disclosure statements on scheduled dates. *See* N.Y.C. Charter § 1052(a)(8); Admin. Code §§ 3-703(6), (12), 3-708(8); Board Rules 1-09, 3-02.

The Campaign failed to file disclosure statements 9 through 16.

The Board assessed a penalty of \$3,816 for this violation.

6. Maintaining a petty cash fund greater than \$500. \$7

Campaigns are prohibited from maintaining more than \$500 in a petty cash fund. *See* Board Rule 4-01(e)(2).

The Campaign exceeded the petty cash on hand limit by \$830.20.

The Board assessed a penalty of \$7 for this violation.

7. Failing to report transactions. \$6

Campaigns are required to properly report all financial transactions to the Board. *See* Admin. Code §§ 3-703(1)(d), (g), (6), (11), (12); Board Rules 1-09, 3-03(c), (d), (e), 4-01.

The Campaign failed to report 15 transactions totaling \$3,869.

The Board assessed a penalty of \$6 for this violation.



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8. Failing to respond to the Initial Documentation Request. \$500

Campaigns are required to maintain records, such as copies of checks, invoices, and bank records, to verify financial transactions reported in disclosure statements, and campaigns are required to provide such records to the Board upon request and to respond to specific questions regarding compliance with the Act and Rules. *See* Admin. Code §§ 3-703(1)(d), (g), (6), (11), (12), 3-708(5), 3-710(1); Board Rules 1-09(a), 4-01, 4-05(a).

The Campaign failed to respond to the Initial Documentation Request.

The Board assessed a penalty of \$500 for this violation.

9. Failing to respond to the Draft Audit Report. \$500

Campaigns are required to maintain records, such as copies of checks, invoices, and bank records, to verify financial transactions reported in disclosure statements, and campaigns are required to provide such records to the Board upon request and to respond to specific questions regarding compliance with the Act and Rules. *See* Admin. Code §§ 3-703(1)(d), (g), (6), (11), (12), 3-708(5), 3-710(1); Board Rules 1-09(a), 4-01, 4-05(a).

The Campaign failed to respond to the Draft Audit Report.

The Board assessed a penalty of \$500 for this violation.