

Ashok Chandra, CD #4 (2009)

1. Accepting a prohibited contribution No Penalty

Campaigns may not accept a contribution from a limited liability company. *See* N.Y.C. Charter § 1052(a)(13); Admin. Code § 3-703(1)(l); Board Rules 1-04(c), (e).

The Campaign reported that it had accepted a \$10 contribution; however, documentation submitted to the Board indicated that the contribution was from Geller Family Office Services, a limited liability company. Upon notice from CFB staff, the Campaign refunded the prohibited contribution, but it did not report the refund.

The Board did not assess a penalty for this violation.

2. Failing to comply with subcontractor reporting requirements \$300

Campaigns are required to report the use of subcontractors by vendors who receive payments of more than \$5,000 for goods or services. *See* Admin. Code § 3-703(6); Board Rule 3-03(e)(3). Campaigns are also required to obtain and maintain documentation from a vendor that has used a subcontractor. *See* Admin. Code §§ 3-703(1)(d), (g); Board Rule 4-01(h).

The Campaign failed to provide information regarding the use of subcontractors from GSP (\$21,375), Monty Warner Communications (\$13,750), and The Townsend Group (\$51,139).

The Board assessed a penalty of \$300 for this violation.

3. Failing to document an in-kind contribution \$50

Upon the Board's request, a campaign is required to provide copies of checks, bills, or other documentation to verify contributions, expenditures or other transactions. *See* Admin. Code §§ 3-703(1)(d), (g); Board Rule 4-01.

The Campaign reported, but failed to adequately document, a \$1,200 in-kind contribution from Jain Harinder on October 9, 2009. The Campaign provided a "guest check" receipt, but did not provide any proof of the source of the contribution.

The Board assessed a penalty of \$50 for this violation.

4. Filing a late response to the draft audit report \$5,000

A campaign is required to respond to the draft audit report by the due date. *See* Admin. Code §§ 3-703(1)(d), (g), 3-708(5), 3-710(1), 3-711(1); Board Rules 1-09(a), 4-01, 4-05.

The DAR for the Campaign was issued on June 10, 2010, and the Campaign's response was due on July 12, 2010. The Campaign requested and was granted numerous extensions, resulting in a new due date of January 7, 2011. A "No Response" letter was sent to the Campaign on March 8, 2011, and the Campaign responded on August 23, 2011, 228 days late.

The Board assessed a penalty of \$5,000 for this violation.