



New York City Campaign Finance Board

100 Church Street, 12th Floor, New York, NY 10007
212.409.1800 | www.nycffb.info

Via C-Access
March 7, 2017

Herbert Block
New Yorkers for de Blasio
16 Coolidge Avenue
White Plains, NY 10606

Dear Herbert Block:

Please find attached the New York City Campaign Finance Board's ("CFB" or "Board") Final Audit Report for the 2013 campaign of Bill de Blasio (the "Campaign"). CFB staff prepared the report based on a review of the Campaign's financial disclosure statements and documentation submitted by the Campaign.

This report incorporates the Board's final determination of December 15, 2016 (attached). As detailed in the report, the Campaign failed to demonstrate compliance with the Campaign Finance Act (the "Act") and the Board Rules (the "Rules").

As detailed in the attached Final Board Determination, the Campaign must repay the following:

CATEGORY	AMOUNT
Public Funds Repayment	\$485.02
Penalties Assessed	\$47,778.00
Amount previously paid	(\$47,778.00)
Total Owed	\$485.02

The full amount owed must be paid no later than **April 6, 2017**. Please send a check in the amount of \$485.02, payable to the "New York City Election Campaign Finance Fund," to: New York City Campaign Finance Board, 100 Church Street, 12th Floor, New York, NY 10007.

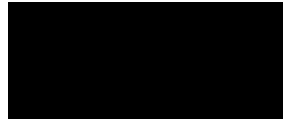
If the CFB is not in receipt of the full amount owed by **April 6, 2017**, the Candidate's name and the amount owed will be posted on the CFB's website. The CFB may also initiate a civil action to compel payment. In addition, the Candidate will not be eligible to receive public funds for any future election until the full amount is paid. Further information regarding liability for this debt can be found in the attached Final Board Determination.

The Campaign may challenge a public funds determination in a petition for Board reconsideration within thirty days of the date of the Final Audit Report as set forth in Board Rule 5-02(a). However, the Board will not consider the petition unless the Campaign submits new information and/or documentation and shows good cause for its previous failure to provide this information or documentation. To submit a petition, please call the Legal Unit at 212-409-1800.

The January 15, 2014 disclosure statement (#16) was the last disclosure statement the Campaign was required to file with the CFB for the 2013 elections. If the Campaign raises additional contributions to pay outstanding liabilities, please note that all 2013 election requirements, including contribution limits, remain in effect. The Campaign is required to maintain its records for six years after the election, and the CFB may require the Campaign to demonstrate ongoing compliance. *See* Rules 3-02(b)(3), 4-01(a), and 4-03. In addition, please contact the New York State Board of Elections for information concerning its filing requirements.

The CFB appreciates the Campaign's cooperation during the 2013 election cycle. Please contact the Audit Unit at 212-409-1800 or AuditMail@nyccfb.info with any questions about the enclosed report.

Sincerely,

A solid black rectangular box redacting the signature of Suda S. Chapman.

Signature on original

Suda S. Chapman
Director of Auditing and Accounting

c: Bill de Blasio
181 East End Avenue, Gracie Mansion
New York, NY 10128

New Yorkers for de Blasio
16 Coolidge Avenue
White Plains, NY 10606

Attachments



EC2013 Final Audit Report

New Yorkers for de Blasio

March 2017

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RESULTS IN BRIEF

The results of the New York City Campaign Finance Board’s (“CFB” or “Board”) review of the reporting and documentation of the 2013 campaign of Bill de Blasio (the “Campaign”) indicate findings of non-compliance with the Campaign Finance Act (the “Act”) and Board Rules (the “Rules”) as detailed below:

Disclosure Findings

Accurate public disclosure is an important part of the CFB’s mission. Findings in this section relate to the Campaign’s failure to completely and timely disclose the Campaign’s financial activity.

- The Campaign did not report or inaccurately reported financial transactions to the Board (see Finding #1).
- The Campaign did not file the required daily disclosure statements during the two weeks preceding the 2013 primary and general elections (see Finding #2).
- The Campaign did not properly disclose advance purchases (see Finding #3).
- The Campaign did not disclose payments made by its vendors to subcontractors (see Finding #4).

Contribution Findings

All campaigns are required to abide by contribution limits and adhere to the ban on contributions from prohibited sources. Further, campaigns are required to properly disclose and document all contributions. Findings in this section relate to the Campaign’s failure to comply with the requirements for contributions under the Act and Rules.

- The Campaign accepted aggregate contributions exceeding the \$4,950 contribution limit for the 2013 election cycle (see Finding #5).
- The Campaign accepted a contribution from a prohibited source (see Finding #6).
- The Campaign accepted contributions from unregistered political committees (see Finding #7).
- The Campaign did not document the fair market value of in-kind contributions received and did not disclose in-kind contributions received (see Finding #8).

- The Campaign did not report that contributions were received through intermediaries and the Campaign did not provide intermediary affirmation statements for contributions received through intermediaries (see Finding #9).
- The Campaign did not provide requested documentation related to reported contributions (see Finding #10).
- The Campaign submitted contribution documentation for reported contributions, some of which were matching claims, that indicates that the transactions were not valid (see Finding #11).

Expenditure Findings

Campaigns participating in the Campaign Finance Program are required to comply with the spending limit. All campaigns are required to properly disclose and document expenditures and disburse funds in accordance with the Act and Rules. Findings in this section relate to the Campaign's failure to comply with the Act and Rules related to its spending.

- The Campaign did not properly report and/or document its joint expenditures (see Finding #12).
- The Campaign made expenditures that were not in furtherance of the Campaign (see Finding #13).
- The Campaign made post-election expenditures that are not permissible (see Finding #14).
- The Campaign did not provide requested documentation related to reported expenditures (see Finding #15).

Public Matching Funds Findings

The CFB matches contributions from individual New York City residents at a \$6-to-\$1 rate, up to \$1,050 per contributor. The CFB performs reviews to ensure that the correct amount of public funds was received by the Campaign and that public funds were spent in accordance with the Act and Rules. Findings in this section relate to whether any additional public funds are due, or any return of public funds by the Campaign is necessary.

- The Campaign is required to return its final bank balance (see Finding #16).

Other Findings

- The Campaign commingled 2013 election cycle receipts and expenditures with receipts and expenditures from a previous election and from the Candidate's Transition and Inauguration Entity (see Finding #17).

BACKGROUND

The Campaign Finance Act of 1988, which changed the way election campaigns are financed in New York City, created the voluntary Campaign Finance Program. The Program increases the information available to the public about elections and candidates' campaign finances, and reduces the potential for actual or perceived corruption by matching up to \$175 of contributions from individual New York City residents. In exchange, candidates agree to strict spending limits. Those who receive funds are required to spend the money for purposes that advance their campaign.

The CFB is the nonpartisan, independent city agency that administers the Campaign Finance Program for elections to the five offices covered by the Act: Mayor, Public Advocate, Comptroller, Borough President, and City Council member. All candidates are required to disclose all campaign activity to the CFB. This information is made available via the CFB's online searchable database, increasing the information available to the public about candidates for office and their campaign finances.

All candidates must adhere to strict contribution limits and are banned from accepting contributions from corporations, partnerships, and limited liability companies. Additionally, participating candidates are prohibited from accepting contributions from unregistered political committees. Campaigns must register with the CFB, and must file periodic disclosure statements reporting all financial activity. The CFB reviews these statements after they are filed and provides feedback to the campaigns.

The table below provides detailed information about the Campaign:

Name: Bill de Blasio	Contribution Limit:
ID: 326	\$4,950
Office Sought: Mayor	
	Expenditure Limit:
Committee Name: New Yorkers for de Blasio	2010–2012: \$303,000
Classification: Participant	2013 Primary: \$6,426,000
Certification Date: May 30, 2013	2013 General: \$6,426,000
	Public Funds:
Ballot Status: Primary, General	Received: \$3,994,496
Primary Election Date: September 10, 2013	Returned: \$22,300
General Election Date: November 5, 2013	
Party: Democratic, Working Families	
	Campaign Finance Summary:
	http://bit.ly/UnziSU

SCOPE AND METHODOLOGY

Pursuant to Admin. Code § 3-710(1), the CFB conducted this audit to determine whether the Campaign complied with the Act and Rules. Specifically, we evaluated whether the Campaign:

1. Accurately reported financial transactions and maintained adequate books and records.
2. Adhered to contribution limits and prohibitions.
3. Disbursed funds in accordance with the Act and Rules.
4. Complied with expenditure limits.
5. Received the correct amount of public funds, or whether additional funds are due to the Campaign or must be returned.

Prior to the election, we performed preliminary reviews of the Campaign's compliance with the Act and Rules. We evaluated the eligibility of each contribution for which the Campaign claimed matching funds, based on the Campaign's reporting and supporting documentation. We also determined the Candidate's eligibility for public funds by ensuring the Candidate was on the ballot for an election, was opposed by another candidate on the ballot, and met the two-part threshold for receiving public funds. In January of 2013, we requested all bank statements to date from the Campaign and reconciled the activity on the statements provided to the Campaign's reporting. We then provided the results of this preliminary bank reconciliation to the Campaign on April 19, 2013. Based on various criteria, we also selected the Campaign for an onsite review, and visited the Campaign's location to observe its activity and review its recordkeeping. After the election, we performed an audit of all financial disclosure statements submitted for the election (see summary of activity reported in these statements at Appendix #1).

To verify that the Campaign accurately reported and documented all financial transactions, we requested all of the Campaign's bank statements and reconciled the financial activity on the bank statements to the financial activity reported on the Campaign's disclosure statements. We identified unreported, misreported, and duplicate disbursements, as well as reported disbursements that did not appear on the Campaign's bank statements. We also calculated debit and credit variances by comparing the total reported debits and credits to the total debits and credits amounts appearing on the bank statements. Because the Campaign reported that more than 25% of the dollar amount of its total contributions were in the form of credit card contributions—or had a variance between the total credit card contributions reported and the credits on its merchant account statements of more than 4%—we reconciled the transfers on the submitted merchant account statements to the deposits on the bank account statements.

As part of our reconciliation of reported activity to the bank statements the Campaign provided, we determined whether the Campaign properly disclosed all bank accounts. We also determined if the Campaign filed disclosure statements timely and reported required activity daily during the

two weeks before the election. Finally, we reviewed the Campaign's reporting to ensure it disclosed required information related to contribution and expenditure transactions, such as intermediaries and subcontractors.

To determine if the Campaign adhered to contribution limits and prohibitions, we conducted a comprehensive review of the financial transactions reported in the Campaign's disclosure statements. Based on the Campaign's reported contributions, we assessed the total amount contributed by any one source and determined if it exceeded the applicable limit. We also determined if any of the contribution sources were prohibited. We reviewed literature and other documentation to determine if the Campaign accounted for joint activity with other campaigns.

To ensure that the Campaign disbursed funds in accordance with the Act and Rules, we reviewed the Campaign's reported expenditures and obtained documentation to assess whether funds were spent in furtherance of the Candidate's nomination or election. We also reviewed information from the New York State Board of Elections and the Federal Election Commission to determine if the Candidate had other political committees active during the 2013 election cycle. We determined if the Campaign properly disclosed these committees, and considered all relevant expenditures made by such committees in the assessment of the Campaign's total expenditures.

We requested records necessary to verify that the Campaign's disbursement of public funds was in accordance with the Act and Rules. Our review ensured that the Campaign maintained and submitted sufficiently detailed records for expenditures made in the election year that furthered the Candidate's nomination and election, or "qualified expenditures" for which public funds may be used. We specifically omitted expenditures made by the Campaign that are not qualified as defined by the Campaign Finance Act § 3-704.

We also reviewed the Campaign's activity to ensure that it complied with the applicable expenditure limits. We reviewed reporting and documentation to ensure that all expenditures—including those not reported, or misreported—were attributed to the period in which the good or service was received, used, or rendered. We also reviewed expenditures made after the election to determine if they were for routine activities involving nominal costs associated with winding up a campaign and responding to the post-election audit.

To ensure that the Campaign received the correct amount of public funds, and to determine if the Campaign must return public funds or was due additional public funds, we reviewed the Campaign's eligibility for public matching funds, and ensured that all contributions claimed for match by the Campaign were in compliance with the Act and Rules. We determined if the Campaign's activity subsequent to the pre-election reviews affected its eligibility for payment. We also compared the amount of valid matching claims to the amount of public funds paid pre-election and determined if the Campaign was overpaid, or if it had sufficient matching claims, qualified expenditures, and outstanding liabilities to receive a post-election payment. As part of this review, we identified any deductions from public funds required under Rule 5-01(n).

We determined if the Campaign met its mandatory training requirement based on records of training attendance kept throughout the 2013 election cycle. Finally, we determined if the Campaign submitted timely responses to post-election audit requests sent by the CFB.

Following an election, campaigns may only make limited winding up expenditures and are not going concerns. Because the activity occurring after the post-election audit is extremely limited, the audit focused on substantive testing of the entire universe of past transactions. The results of the substantive testing served to establish the existence and efficacy of internal controls. The CFB also publishes and provides to all campaigns guidance regarding best practices for internal controls.

To determine if contributors were prohibited sources, we compared them to entities listed in the New York State Department of State's Corporation/Business Entity Database. Because this was the only source of such information, because it was neither practical nor cost effective to test the completeness of the information, and because candidates could provide information to dispute the Department of State data, we did not perform data reliability testing. To determine if reported addresses were residential or commercially zoned within New York City, we compared them to a database of addresses maintained by the New York City Department of Finance. Because this was the only source of such data available, because it was not cost effective to test the completeness of the information, and because campaigns had the opportunity to dispute residential/commercial designations by providing documentation, we did not perform data reliability testing.

In the course of our reviews, we determined that during the 2013 election cycle a programming error affected C-SMART, the application created and maintained by the CFB for campaigns to disclose their activity. Although the error was subsequently fixed, we determined that certain specific data had been inadvertently deleted when campaigns amended their disclosure statements and was not subsequently restored after the error was corrected. We were able to identify these instances and did not cite exceptions that were the result of the missing data or recommend violations to the Board. The possibility exists, however, that we were unable to identify all data deleted as a result of this error.

The CFB's Special Compliance Unit investigated any complaints filed against the Campaign that alleged a specific violation of the Act or Rules. The Campaign was sent a copy of all formal complaints made against it, as well as relevant informal complaints, and was given an opportunity to submit a response.

The Campaign was provided with a preliminary draft of this audit report and was asked to provide a response to the findings. The Campaign responded, and the CFB evaluated any additional documentation provided and/or amendments to reporting made by the Campaign in response. The Campaign was subsequently informed of its alleged violations and obligation to repay public funds, and was asked to respond. The Campaign responded and the CFB evaluated any additional information provided by the Campaign. CFB staff recommended that the Board find that the Campaign must repay public funds and committed violations subject to penalty. The Campaign chose not to contest the CFB staff recommendations. The Board's actions are summarized as a part of each Finding in the Audit Results section. The finding numbers and

exhibit numbers, as well as the number of transactions included in the findings, may have changed from the Draft Audit Report to the Final Audit Report.

COMPLAINTS

On November 1, 2013, E. O'Brien Murray filed a complaint alleging the following:

Allegation

On November 1, 2013, E. O'Brien Murray filed a complaint against the Campaign. The Complaint alleged that the Campaign improperly coordinated with The Advance Group ("TAG"), and its clients, New York City Not for Sale ("NYCN4S") and New Yorkers for Clean, Livable, and Safe Streets, Inc. ("NYCLASS"), in independent expenditures made during the 2013 Democratic primary election.¹

According to the Complaint, individuals and entities with a history of supporting the Campaign used NYCLASS and another organization as pass-throughs to disguise the source of funding intended for NYCN4S and its expenditures targeting Christine Quinn.² The Complaint pointed to a pattern of contributions made to NYCLASS and CWA Local 1180, which then contributed identical amounts to NYCN4S, as evidence of this scheme. The Complaint alleged that the scheme is the result of coordination between TAG and the Campaign, which the personal relationship of TAG executives and the candidate made possible.

On November 7, 2013, CFB staff provided the Campaign with a copy of the Complaint and an opportunity to respond. The Campaign responded timely on November 26, 2013. In its response, the Campaign provided an affidavit from campaign manager Bill Hyers. Mr. Hyers denied that the Campaign had coordinated with TAG, NYCN4S, or NYCLASS. Mr. Hyers further denied that any of the individuals or entities that contributed to NYCN4S and NYCLASS were sufficiently involved with the Campaign to constitute a violation of Board Rules concerning coordination.

Analysis

Records of contributions and expenditures reported by NYCLASS and NYCN4S, and research conducted by CFB, include the following transactions from certain of the parties referenced in the Complaint:

¹ The Complaint also alleged that the 2013 campaigns of Laurie Cumbo and Mark Levine improperly coordinated with TAG and its clients, NYCLASS and United For the Future. Although not based on the Complaint, the Board determined that both campaigns had improperly coordinated with NYCLASS due to their relationship with TAG. *See* Summary of Final Board Determination: Mark Levine (May 21, 2014), http://www.nycfb.info/PDF/news_media/140516_press_memo_mark_levine.pdf; Summary of Final Board Determination: Laurie Cumbo (May 21, 2014) http://www.nycfb.info/PDF/news_media/140513_press_memo_laurie_cumbo.pdf.

² Ms. Quinn ran against Mr. de Blasio in the Primary election.

Jay Eisenhofer, who intermediated \$82,500 in contributions to the Campaign

- On June 1, 2013, Jay Eisenhofer contributed \$50,000 to NYCLASS.
- On May 31, 2013, NYCLASS contributed \$50,000 to NYCN4S.³

UNITE HERE, an international labor union formerly headed by the Candidate's cousin

- On June 1, 2013, UNITE HERE contributed \$175,000 to NYCLASS.
- On June 3, 2013, NYCLASS contributed \$175,000 to NYCN4S.⁴

Communication Workers of America ("CWA") District 1, which endorsed Bill de Blasio

- On May 8, CWA District 1 transferred \$507,200 to CWA Local 1180.
- On May 9, 2013, CWA Local 1180 contributed \$507,000 to NYCN4S.

Together, these three contributors account for almost two-third of NYCN4S' net contributions.⁵ One of the factors in determining a spender's independence is whether the spender has been "financed ... by any of the same persons or entities as those that have ... financed ... [the campaign]." Board Rule 1-08(f)(1)(iv). Thus the movement of significant funding from prominent supporters of a candidate to a spender that then makes expenditures beneficial to that candidate is of concern to the Board. TAG's involvement is also of concern. TAG handled independent expenditure compliance for both NYCLASS and NYCN4S, NYCLASS operated out of TAG's offices, and TAG was found by the Board to be an agent of NYCLASS for the 2013 elections.

Resolution

While the amount and pattern of these contributions indicates cooperation between the contributors, NYCN4S, NYCLASS, and TAG, CFB staff have not uncovered sufficient evidence to substantiate the allegation that the Campaign coordinated with any of these parties in the making of these contributions or the subsequent expenditures. As a result, the Board has taken no action on this matter other than to make it part of the Candidate's record with the Board.

³ This contribution was refunded to NYCLASS on August 26, 2013. *See* next footnote.

⁴ This contribution was refunded to NYCLASS on September 5, 2013. Refunds to NYCLASS totaled \$225,000. The funds for these refunds were provided by \$227,000 in contributions made in August 2013 by individuals and entities associated with or controlled by NYCLASS, Stephen Nislick and Wendy Neu. Mr. Nislick and Ms. Neu are the founders of NYCLASS and held two out of the three seats on NYCN4S' board in 2013. The third seat was held by Arthur Cheliotis, the president of CWA Local 1180.

⁵ The remainder of NYCN4S's funding came entirely from Mr. Nislick, Ms. Neu and entities controlled by them.

AUDIT RESULTS

Disclosure Findings

1. Financial Disclosure Reporting - Discrepancies

Campaigns are required to report every disbursement made, and every contribution, loan, and other receipt received. *See Admin. Code § 3-703(6); Rule 3-03.* In addition, campaigns are required to deposit all receipts into an account listed on the candidate’s Certification. *See Admin. Code § 3-703(10); Rule 2-06(a).* Campaigns are also required to provide the CFB with bank records, including periodic bank statements and deposit slips. *See Admin. Code §§ 3-703(1)(d), (g); Rules 4-01(a), (b)(1), (f).*

The Campaign provided the following bank statements:

BANK	ACCOUNT #	ACCOUNT TYPE	STATEMENT PERIOD
Chase	XXXX6460	Checking	Apr 2010 – Nov 2016
Chase	XXXX6747	Savings	Mar 2012 – Jul 2013
Chase	XXXX6546	Checking (Runoff)	Jul 2013 – Sept 2015
First Bank	XXXX2884	Merchant	May 2010 – Jan 2014
First Bank	XXXX7889	Merchant (Runoff)	Jul 2013 – Dec 2013
PayPal	XXXXRJ4Y	Merchant Processor (Runoff)	Jul 2013 – Jan 2015

Below are the discrepancies and the additional records needed, as identified by a comparison of the records provided and the activity reported by the Campaign on its disclosure statements.

a) The Campaign must provide the bank statements listed below:

BANK	ACCOUNT #	STATEMENT PERIOD	NOTES
Chase	XXXX6747	Aug 2013	(1)

(1) The Campaign provided a printout that showed the account closed on August 15, 2013, however the Campaign did not provide an actual bank statement for this month.

b) The Campaign did not report the transactions listed on Exhibit I that appear on its bank statements.

c) The Campaign did not properly report the transactions listed on Exhibit II.

d) The Campaign reported duplicate transactions listed on Exhibit III.

Previously Provided Recommendation

a) The Campaign must provide all pages of the requested bank and merchant account statements.

b) The Campaign must amend its disclosure statements to report these transactions. The Campaign must also provide documentation for each transaction. Because bank statements provide limited information about a transaction, the Campaign should review invoices or other records to obtain all of the information necessary to properly report the transaction.

c) For inaccurately reported transactions, the Campaign must amend its disclosure statements to accurately report the transactions.

d) This finding was identified as a result of the Campaign's response to the Draft Audit Report.

Please note that any newly entered transactions that occurred during the election cycle (01/12/10—01/11/14) will appear as new transactions in an amendment to Disclosure Statement 16, even if the transaction dates are from earlier periods. Any transactions dated after the election cycle will appear in disclosure statements filed with the New York State Board of Elections. Also note that the Campaign must file an amendment for each disclosure statement in which transactions are being modified. Once all data entry is completed, the Campaign should run the Modified Statements Report in C-SMART to identify the statements for which the Campaign must submit amendments. The C-SMART draft and final submission screens also display the statement numbers for which the Campaign should file amendments. If the Campaign added any new transactions, it must submit an amendment to Disclosure Statement 16.⁶

Campaign's Response

a) In its Draft Audit Report response, the Campaign provided additional bank statements but did not provide the listed bank statement.

b) In its Draft Audit Report response, the Campaign did not amend its disclosure statements to report the listed transactions.

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign provided a copy of the cancelled check for check #1074, which listed "Contribution Refund" in the memo section. The Campaign also states that this check was re-deposited into the Campaign's account. However, the copy of the cancelled check does not show that the check was endorsed and is stamped as "check exchanged for cashiers check." This documentation does not give any indication that the check was re-deposited into the Campaign's account, as indicated by the Campaign. The cancelled check from the bank shows a posting date of February 18, 2011, the

⁶ If the Campaign amends its reporting with the CFB, it must also submit amendments to the New York State Board of Elections.

same date that check number #1074 is debited from the bank account. There are four official check charges on February 18, 2011 according to the Campaign's bank statement, but no withdrawal on that date, which indicates that four official checks were issued that day, three of which have been documented as also being committee checks exchanged for cashier's checks (see Transaction IDs 16/M/R0005987 and 16/M/R0006250 and 16/M/42928). This fact indicates that check #1074 could not have been directly re-deposited back into the Campaign's bank account, but rather that its funds were first disbursed from the account. If the cashier's check issued from the committee check #1074 was not given to the intended payee (whose purpose or identity cannot be assumed from the cancelled committee check, as we do not have a copy of the cashier's check) and was deposited by the Campaign, the Campaign should have reported the expenditure and expenditure refund. Moreover, it failed to provide documentation to support its assertion that the committee check (or cashier's check) was deposited into the bank account.

The Campaign did not contest the remaining listed transactions in its response to the Notice of Alleged Violations and Recommended Penalties.

- c) In its Draft Audit Report response, the Campaign did not amend its disclosure statements to accurately report the listed transactions.
- d) This finding was identified as a result of the Campaign's response to the Draft Audit Report.

Board Action

- a) The Board has taken no further action on this matter other than to make it a part of the Candidate's record with the Board.
- b) The Board found the Campaign in violation and in combination with Finding #3 assessed \$407 in penalties.
- c – d) The Board has taken no further action on this matter other than to make this a part of the Candidate's record with the Board.

2. Daily Pre-Election Disclosure – Statements of Contributions/Expenditures

During the 14 days preceding an election, if a candidate: (1) accepts a loan, contribution, or contributions from a single source in excess of \$1,000; or (2) makes aggregate expenditures to a single vendor in excess of \$20,000, the candidate shall report such contributions, loans, and expenditures to the Board in a disclosure, received by the Board within 24 hours of the reportable transaction. *See* Rule 3-02(e). This includes additional payments of any amount to vendors who have received aggregate payments in excess of \$20,000 during the 14-day pre-election period. These contributions and expenditures must also be reported in the Campaign's next disclosure statement.

a) The Campaign did not file the required daily disclosures to report the contributions listed on Exhibit IV.

b) The Campaign did not file the required daily disclosures to report the expenditures listed on Exhibit V.

Previously Provided Recommendation

a – b) If the Campaign believes it filed the required daily disclosures timely, as part of its response it must submit the C-SMART disclosure statement confirmation email as proof of the submission. The Campaign may provide an explanation if it believes that its failure to file the daily disclosures is not a violation, but it cannot file daily pre-election disclosures now.

Campaign's Response

In its Draft Audit Report response, the Campaign did not contest the findings. However, the Campaign described the large volume of daily pre-election disclosures it was required to report and, because the Campaign was able to report much of it, asked the CFB to find the omissions to be “de minimis” and therefore not subject to a penalty.

In addition, the Campaign reported new transactions with its Draft Audit Report response that resulted in new findings of unreported daily disclosure transactions because of the Campaign's failure to report the contributions contemporaneously. The Campaign reported three previously unreported contributions that should have been disclosed in the primary election period and two previously unreported contributions that should have been disclosed during the general election period. In response to a Draft Audit Report finding regarding suspected intermediaries, the Campaign also stated that contributions reported as received on November 5, 2013 were actually received on October 17, 2013. In four instances, due to the amount of the contribution, the difference in received date would have triggered the daily disclosure requirement. *See* Exhibit IVa.

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not contest this finding.

Board Action

The Board found the Campaign in violation and assessed \$2,087 in penalties.

3. Disclosure – Advances

For each advance, campaigns are required to report the name and address of the person making the purchase (the advancer), the amount, and the name of the vendor from whom the purchase was made. *See* Admin. Code §§ 3-703(1)(g), 3-708(8); Rule 3-03(c)(3).

a) The Campaign’s reported explanation indicates that the following transaction, reported as an expenditure, was actually an advance:

NAME	PURPOSE CODE	STATEMENT/ SCHEDULE/ TRANSACTION	PURCHASE DATE/ INVOICE DATE	AMOUNT	NOTES
Mendez, Zenaida	FUNDR	4/F/R0008775	12/23/11	\$420.00	(1)

(1) This finding was identified as a result of the Campaign’s response to the Draft Audit Report. The Campaign stated that this transaction was an expenditure for a fundraiser on December 14, 2011 at El Rio Gallery. As the Campaign identified the payment to Ms. Mendez as the expenditure for this event, and does not appear to have paid El Rio Gallery, it appears that Ms. Mendez advanced expenditure(s) for this event.

b) The Campaign’s reported explanation indicates that the following transaction, reported as an expenditure, was actually an advance:

NAME	PURPOSE CODE	STATEMENT/ SCHEDULE/ TRANSACTION	PURCHASE DATE/ INVOICE DATE	AMOUNT	NOTES
Nehal Trivedi Attorneys at Law	FUNDR	8/F/R0019861	04/30/13	\$1,000.00	(1)

(1) This finding was identified as a result of the Campaign’s response to the Draft Audit Report dated February 20, 2015. The Campaign stated that this transaction was an expenditure for a fundraiser on April 24, 2013 at World Fair Marina. As the Campaign identified the payment to Nehal Trivedi Attorneys at Law as the expenditure for this event and does not appear to have paid World Fair Marine, it appears that Nehal Trivedi Attorneys at Law advanced expenditure(s) for this event. *See* also Findings #6 c) and #8 c).

Previously Provided Recommendation

a – b) These finding were identified as a result of the Campaign’s response to the Draft Audit Report.

Campaign’s Response

a – b) The Campaign did not address these findings in its response to the Notice of Alleged Violations and Recommended Penalties.

Board Action

a) The Board found the Campaign in violation and in combination with Finding #1 b) assessed \$407 in penalties.

b) The Board has taken no further action on this matter other than to make it a part of the Candidate's record with the Board. *See Finding # 6 c).*

4. Disclosure – Possible Subcontractors

Subcontractors are vendors that a campaign's vendor hires to supply goods/services. If a vendor hired by a campaign pays a subcontractor more than \$5,000, the campaign must report the vendor, the name and address of the subcontractor, the amounts paid to the subcontractor, and the purpose of the subcontracted goods/services. *See Rule 3-03(e)(3).*

The vendor listed below received large payments and may have subcontracted goods and services. However, the Campaign did not report subcontractors used by these vendor:

PAYEE	AMOUNT PAID
Precision Network	\$191,116.00

Previously Provided Recommendation

The Campaign must contact the vendors, who must verify whether subcontractors were used. The Campaign may provide the vendor with a copy of the Subcontractor Form (available on the CFB website at http://www.nyccfb.info/PDF/forms/subcontractor_disclosure_form.pdf) for this purpose, and submit the completed form with the Campaign's response. In addition, if subcontractors were used and paid more than \$5,000, the Campaign must amend its disclosure statements to report subcontractor information. If the vendor does not complete the Subcontractor Form, the Campaign should submit documentation of its attempts to obtain this information, including copies of certified mail receipts and the letters sent to the vendors.

Campaign's Response

In its Draft Audit Report response, the Campaign provided a Subcontractor Form completed by the Precision Network, which lists seven subcontractors. The Campaign did not report one subcontractor, Collective Media, Inc, who was paid \$17,199.92.

Board Action

The Board has taken no further action on this matter other than to make this a part of the Candidate's record with the Board.

Contribution Findings

5. Prohibited Contributions – Contributions Over the Limit

Campaigns may not accept contributions, either directly or by transfer, from any single source in excess of the applicable contribution limit for the entire election cycle. A single source includes, but is not limited to, any person or entity who or which establishes, maintains, or controls another entity and every entity so established, maintained, or controlled. *See* Rule 1-04(h). Cumulative contributions from a single source may include monetary contributions, in-kind contributions, and outstanding loans or advances, etc.

Candidates participating in the Program may contribute up to three times the contribution limit to their own campaign. *See* Admin. Code § 3-703(1)(h). Non-participating candidates are not limited in the amount they can contribute to their own campaign from their own money. *See* Admin. Code § 3-719(2)(b).

Prior to the election, the Campaign accepted contributions in excess of the contribution limit in the instances detailed in Exhibit VI. After notification from the CFB, the Campaign refunded the amount in excess of the limit.

Previously Provided Recommendation

The Campaign previously resolved these contribution limit findings by issuing and documenting refunds, and no further response is necessary at this time. However, the findings may still be subject to penalty. If the Campaign disagrees with this finding, it must provide an explanation and documentation to demonstrate that it did not accept contributions in excess of the limit.

Campaign's Response

In its Draft Audit Report response, the Campaign stated that during the general election period it experienced technical difficulties with the CFB's CSMART software. The Campaign stated that, while entering contribution data, the CSMART feature that alerts campaigns to a possible over the limit contributions did not warn the staff members entering data about 12 of the contributors cited as previously refunded over the limit findings. The Campaign also stated that five of the findings occurred during daily pre-election disclosures, and during that time, the disclosures did not show up on reports used by the Campaign to identify contributions over the limit. However, these issues do not negate the facts underlying the findings.

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not dispute the findings. The findings related to contributors Howard Lorma, Cholene Espinoza, Steven Toulopoulos, Antonios Florentinos, Staphanie A. Ingrassia, and Rachel McPherson-McMullan were added as a result of the Campaign's response to the Notice of Alleged Violations in which it refunded the over the limit portion of each contribution.

Board Action

The Board found the Campaign in violation and assessed \$12,483 in penalties.

6. Prohibited Contributions – Corporate/Partnership/LLC

Campaigns may not accept, either directly or by transfer, any contribution, loan, guarantee, or other security for a loan from any corporation. This prohibition also applies to contributions received after December 31, 2007 from any partnership, limited liability partnership (LLP), or limited liability company (LLC). *See* New York City Charter §1052(a)(13); Admin. Code §§ 3-703(1)(l), 3-719(d); Rules 1-04(c), (e).

a) Prior to the election, the Campaign accepted contributions from entities listed on the New York State Department of State's website as corporations, partnerships, and/or LLCs in the instances detailed in Exhibit VII. After notification from the CFB, the Campaign refunded the contributions.

b) Based on documentation provided by the Campaign, the Campaign received in-kind contributions for fundraising events, listed in Exhibit VIII. The Campaign provided documentation to the CFB and reporting to the BOE, after the date of the CFB's final disclosure statement, demonstrating that it held fundraising events, hosted by corporate entities for those events designated with footnote (1), where expenditures were provided free of charge or repaid by the Campaign at the heavily discounted, and seemingly arbitrary, rate of \$25. *See* also Finding #8b).

c) The Campaign reported an expenditure to Nihal Trivedi Attorneys at Law for \$1,000.00 (Transaction ID 8/F/R0019861) that the Campaign identified as an expenditure for a fundraiser on April 24, 2013, at World Fair Marina (see also Finding #3). The invitation provided by the Campaign indicates that this event included dinner and an open bar, and per the contributor list attached to the invitation, at least 107 people attended. As there were no other expenditures reported by the Campaign that were identified to be associated with this event, it appears that Nihal Trivedi Attorneys at Law gave the Campaign an in-kind contribution for the difference between the actual cost of the event and the undervalued reported expenditure of \$1,000.00.

Previously Provided Recommendation

a) The Campaign previously refunded these prohibited contributions and no further response is necessary at this time. However, the Campaign may still be penalized for accepting these contributions. If the Campaign disagrees with this finding, it must provide an explanation and documentation to demonstrate that its acceptance of the contribution was not a violation.

b – c) For the fundraising event in-kind contributions, the Campaign must explain why it reported minimal expenditures for these events, and provide supporting documentation. If the event hosts, or any other entity, provided any goods or services for the events, the Campaign must provide documentation showing the value of such goods or services and payment. The Campaign must refund the value of any in-kind contributions received from a prohibited business entity by certified check and submit a copy of the check.

Campaign's Response

a) In its Draft Audit Report response, the Campaign stated that with regard to the previously refunded corporate contribution from Stuart Mogul, it was not able to discern the corporate origin of the contribution from the face of the check. However, the check included the contributor's professional title and the contributor was listed as self-employed at his home address. The Campaign did not provide an affirmation letter from the contributor stating that the contribution was made from personal funds. The Campaign did not contest any of the other findings.

The contributions from Hello World Communications and Marco Neira were previously cited in the Draft Audit Report and are now presented here, as a result of the Campaign's response to the Draft Audit Report in which it refunded the corporate contributions.

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not contest this finding.

b) This finding was identified as a result of the Campaign's response to the Draft Audit Report.

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign disputed the unreported in-kind related to Nixon Peabody by stating that the event did not take place. The Campaign stated that in its Initial Documentation Request response it listed the event in error. To support this statement, the Campaign provided a copy of an email chain dated October 12, 2013 from Brittany Wise to Sam Nagourney, two campaign employees. The email is a request from Ms. Wise asking Mr. Nagourney to "remove Nixon Peabody from the list of open events." However, this email does not demonstrate that the Campaign did not hold a Nixon Peabody fundraiser, nor did the Campaign provide any documentation from Nixon Peabody verifying its claim. Moreover, the information submitted by the Campaign does not address why there was a list of contributions titled, "Nixon Peabody [sic] 10/29/13 Event Contributions," if no event was held.

The Campaign did not dispute any other findings in this category.

Additional fundraisers without corresponding expenditures were identified as a result of the Campaign’s response to a document request dated July 26, 2016.

c) This finding was identified as a result of the Campaign’s response to the Draft Audit Report.

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not contest this finding.

Board Action

a) The Board found the Campaign in violation and assessed \$1,336 in penalties.

b) The Board found the Campaign in violation and assessed \$4,500 in penalties.

c) The Board found the Campaign in violation and assessed \$250 in penalties.

7. Prohibited Contributions – Unregistered Political Committees

Participating campaigns may not, either directly or by transfer, accept any contribution, loan, guarantee, or other security for a loan from any political committee, unless it is registered with the CFB, or registers within ten days of receipt of the contribution. *See Admin. Code §§ 3-703(1)(k), 3-707; Rule 1-04(d).*

A list of registered political committees can be viewed on the CFB’s website, www.nyccfb.info. Political committees are often required to register with governmental agencies other than the CFB; however, registering with those agencies does not register them with the CFB.

a) Prior to the election, the Campaign accepted contributions from unregistered political committees in the instances detailed in Exhibit IX. After notification from the CFB, the Campaign refunded the contributions, or the political committee registered with the CFB.

b) The Campaign reported the following contributor as a political committee. However, the contributor appears to be an individual.

CONTRIBUTIONS FROM UNREGISTERED POLITICAL COMMITTEES				
NAME	NAME CODE	STATEMENT/SCHEDULE/ TRANSACTION	RECEIVED DATE	AMOUNT
Marla Simpson	PCOMP	14/ABC/R0036428	10/19/13	\$400.00

Previously Provided Recommendation

a) The Campaign previously resolved these prohibited contributions and no further response is necessary at this time. However, the Campaign may still be penalized for accepting these

contributions. If the Campaign disagrees with this finding, it must provide an explanation and documentation to demonstrate that its acceptance of the contribution was not a violation.

b) The Campaign must provide a copy of the backup documentation for the transaction listed. The Campaign must explain why the reported contribution was reported as a contribution from a political committee when it appears to be from an individual. If the Campaign reported the contributor as a political committee mistakenly, it must amend its disclosure statements. If the contribution is from an unregistered political committee, the Campaign must report the correct contributor name, refund the prohibited contribution by back or certified check, and provide the CFB with a copy of the refund check.

Campaign's Response

a) In its Draft Audit Report response, the Campaign asks the CFB to consider the findings related to 1199/SEIU NYS Pol. Action Fund and Council of School Supervisors as technical violations with no penalty. The Campaign stated that because committees for the Candidate in previous campaign cycles had accepted contributions from these political committees, the Campaign was unaware that political committee registrations with the CFB do not transfer between election cycles. However, the Campaign did not dispute that these political committees were unregistered for the 2013 election cycle at the time it received the contributions.

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not contest these findings.

b) In its Draft Audit Report response, the Campaign provided a copy of the credit card processing slip for this contribution and stated that the Campaign coded the contribution as a political committee in error. However, the Campaign failed to amend its reporting to reflect this statement.

Board Action

a) The Board found the Campaign in violation and assessed \$1,000 in penalties.

b) The Board has taken no further action on this matter other than to make it a part of the Candidate's record with the Board.

8. Undocumented or Unreported In-Kind Contributions

In-kind contributions are goods or services provided to a campaign for free, paid by a third party, or provided at a discount not available to others. The amount of the in-kind contribution is the difference between the fair market value of the goods or services and the amount the Campaign paid. Liabilities for goods and services for the Campaign which are forgiven, in whole or part, are also in-kind contributions. In addition, liabilities for goods and services outstanding beyond 90 days are in-kind contributions unless the vendor has made commercially reasonable attempts to

collect. An in-kind contribution is both a contribution and expenditure subject to both the contribution and expenditure limits. Volunteer services are not in-kind contributions. In-kind contributions are subject to contribution source restrictions. *See* Admin. Code § 3-702(8); Rules 1-02 and 1-04(g). Campaigns may not accept contributions from any corporation, partnership, limited liability partnership (LLP), or limited liability company (LLC). *See* Admin. Code § 3-703(1)(l).

Campaigns are required to report all in-kind contributions they receive. *See* Admin. Code § 3-703(6); Rule 3-03. In addition, campaigns are required to maintain and provide the CFB documentation demonstrating the fair market value of each in-kind contribution. *See* Admin. Code §§ 3-703(1)(d), (g); Rules 1-04(g)(2) and 4-01(c).

a) The Campaign reported the expenditure listed below. However, the reported payments for these expenditures are not present on any of the bank statements provided by the Campaign, nor are they reported as outstanding liabilities. As a result, the Campaign’s reporting and documentation indicate that a third party paid for these transactions, or that the goods or services were provided by the reported payee for free.

NAME	REPORTED CHECK NO./ TRANSACTION	STATEMENT/ SCHEDULE/ TRANSACTION	PAID DATE	AMOUNT
Verizon	Debit	9/F/R0020562	05/22/13	\$724.05

b) Based on documentation provided by the Campaign, the Campaign received in-kind contributions for fundraising events, listed in Exhibit VIII. The Campaign provided documentation to the CFB and reporting to the BOE, after the date of the CFB’s final disclosure statement, demonstrating that it held fundraising events, where expenditures were provided free of charge or repaid by the Campaign at the heavily discounted, and seemingly arbitrary, rate of \$25. *See* also Finding #6 b).

c) The Campaign reported an expenditure to Nihal Trivedi Attorneys at Law for \$1,000.00 (Transaction 8/F/R0019861) that the Campaign identified as an expenditure for a fundraiser on April 24, 2013 at World Fair Marina (see also Finding #3). The invitation provided by the Campaign indicates that this event included dinner and an open bar, and per the contributor list attached to the invitation, at least 107 people attended. As there were no other expenditures reported by the Campaign that were identified as associated with this event, it appears that Nihal Trivedi Attorneys at Law gave the Campaign an in-kind contribution for the difference between the actual cost of the event and the undervalued reported expenditure of \$1,000.00. *See* also Finding #6 c).

d) On February 17, 2015, three withdrawals totaling \$5,473.99 are on the Campaign’s bank statement for account XXXX6460. However, the Campaign reported a total of \$5,623.99 in expenditures and contribution refunds to the Board of Elections on that day. The Campaign did not provide documentation for all transactions reported on that day, so CFB staff was unable to

confirm which expenditures were not as reported. The difference of \$150 (\$5,623.99 - \$5,473.99) is an unreported in-kind contribution to an unknown source.

Previously Provided Recommendation

a) For each transaction, the Campaign must provide a written explanation describing how the good or service was purchased, or provided, and who paid for it. If the Campaign paid the expenditure, it must provide evidence to show that the transaction cleared the bank (i.e., a copy of the front and back of the check, and the bank statement showing the payment). Alternatively, the Campaign may provide evidence that the transaction was reported in error. If the reported payee donated the goods or services, or they were purchased or donated by a third party, the Campaign must submit an in-kind contribution form completed by the contributor, and report the item as an in-kind contribution by submitting an amendment to Statement 16.

b – c) This finding was identified as a result of the Campaign’s response to the Draft Audit Report.

d) This finding was identified after the Campaign’s response to the Notice of Alleged Violations and Recommended Penalties.

Campaign’s Response

a) In its Draft Audit Report response, the Campaign amended its disclosure statement and deleted Transaction ID 9/F/R0020562 to Verizon for \$724.05. This transaction was originally cited in the Draft Audit Report as an uncleared. The Campaign annotated the associated exhibit to state that it was requesting the account statements to verify that this was a misreported transaction. However, the Campaign did not provide documentation to support its response.

In its response to the Notice of Alleged Violations and Recommended Penalties the Campaign did not contest this finding.

b –c) This finding was identified as a result of the Campaign’s response to the Draft Audit Report.

d) This finding was identified after the Campaign’s response to the Notice of Alleged Violations and Recommended Penalties.

Board Action

a) The Board found the Campaign in violation and assessed \$100 in penalties.

b) The Board has taken no further action on this matter other than to make it a part of the Candidate’s record with the Board. *See Finding #6 b).*

c) The Board has taken no further action on this matter other than to make it a part of the Candidate's record with the Board. *See* Finding #6 c).

d) The Board has taken no further action on this matter other than to make it a part of the Candidate's record with the Board.

9. Intermediary Statements and Possible Unreported Intermediaries

Campaigns are required to report all contributions delivered or solicited by an intermediary. Intermediaries are people who solicit or deliver contributions to campaigns. *See* Admin. Code §§ 3-702(12), 3-703(6); Rules 3-03(c)(1) and (7). Campaigns are required to provide a signed intermediary affirmation statement for each intermediary containing the intermediary's name, residential address, employer and business address, names of the contributors, the amounts contributed and specific affirmation statements. *See* Rule 4-01(b)(5).

a) The Campaign did not report intermediaries for contributions shown on the attached Exhibit X that appear, from the information reported, to have been intermediated.

b) The Campaign did not submit any intermediary affirmation statements, or submitted an intermediary affirmation statement that was missing required information, for the reported intermediaries listed on Exhibit XI.

c) The transactions listed in the Campaign's reporting as intermediated do not match the transactions listed on the intermediary statements, as detailed on Exhibit XII and Exhibit XIII.

d) The details of the Campaign's reporting differ from the information listed on the intermediary affirmation statements as detailed on Exhibit XIV.

e) The Campaign submitted contribution documentation for four contributions that all contain a notation indicating that they were received on October 27, 2013 by "D. Peebles." *See* Exhibit XV. This individual was not reported as an intermediary.

Previously Provided Recommendation

a) The Campaign must describe how each group of contributions listed was solicited and/or delivered. If they were solicited and/or delivered by an intermediary, the Campaign must amend its disclosure statements to reflect this information and provide an intermediary affirmation statement for each previously unreported intermediary.

b) The Campaign must provide the required intermediary statements. For a copy of the form, see the 2013 Forms section of the CFB's website at http://www.nyccfb.info/PDF/forms/intermediary_statement.pdf.

- c) The Campaign must explain why the contributions reported as intermediated differ from those listed on the intermediary statements provided. The Campaign must obtain updated intermediary statements signed by the intermediary with the appropriate transactions listed, or amend its reporting to match the intermediary statements, as appropriate.
- d) The Campaign must explain why the details of the contributions listed as intermediated on the intermediary statement differ from its reporting. The Campaign must provide the backup documentation for each listed contribution. The Campaign must also obtain updated intermediary statements with the correct information or amend its reporting, as appropriate.
- e) This finding was identified as a result of the Campaign's response to the Draft Audit Report.

Campaign's Response

- a) In its Draft Audit Report response, the Campaign did not report the listed contributions as intermediated. The Campaign stated that these contributions were received at an October 27, 2013 event that was hosted by Una Clark. This event did not appear on the list of fundraisers previously provided by the Campaign and no invitation was provided to confirm that this event occurred or that it was Campaign-sponsored.

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not contest this finding.

- b) In its Draft Audit Report response, the Campaign did not provide intermediary statements for the listed intermediaries.

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign provided emails from Robert Levine and Kamlesh Mehta, who both stated that they do not recognize the names of the contributors that the Campaign reported them as having intermediated. However, the emails do not directly state that the intermediaries did not intermediate the listed contributions. The Campaign also did not explain why it believed the contributions were intermediated in the first place and how the contributions were received by the Campaign if not intermediated by Mr. Levine and Mr. Mehta. In addition, for Mr. Mehta, a previous email to him from the Campaign states, "If I sent you a form confirming that Dennis raised the contributions below, would he be willing to sign it and return to me?" The Campaign did not address "Dennis," who may have intermediated the contributions reported as intermediated by Mr. Mehta. In the absence of any other documentation from the intermediaries or the contributors, the Campaign's response is insufficient.

Also in its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign stated that the reporting of Martin Scheinman as an intermediary was in error and provided an email from a staffer, Hayley Prim, stating that the Candidate directly solicited the underlying contribution and that she processed the credit card contribution. However, the Campaign failed to provide a copy of the backup documentation to demonstrate that it was a credit card contribution or an affirmation from the contributor attesting to this statement.

The Campaign also stated that the listing of Sheldon Mallah as an intermediary was in error and that this claim was corroborated by the fact that the Campaign only reported a single contribution as intermediated by him, which appears to be his own. However, the Campaign did not explain why the reported address and employment information for Mr. Mallah as an intermediary and as a contributor were not consistent. This discrepancy does not indicate that the contributions were definitely from the same individual and no documentation was submitted to verify the Campaign's statement.

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not contest any other listed findings.

c) In its Draft Audit Report response, the Campaign failed to modify its reporting or provide further documentation, in order to accurately report the listed contributions found on intermediary statements.

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not dispute this finding.

d) In its Draft Audit Report response, the Campaign did not modify its reporting or provide further documentation in order to accurately report the listed contributions found on intermediary statements.

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not dispute this finding.

e) This finding was identified as a result of the Campaign's response to the Draft Audit Report.

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not dispute this finding.

Board Action

a) The Board found the Campaign in violation and assessed \$100 in penalties.

b – d) The Board found the Campaign in violation and assessed \$3,000 in penalties.

e) The Board found the Campaign in violation and assessed \$100 in penalties.

10. Contribution Documentation

Campaigns are required to provide copies of checks, bills, or other documentation to verify all transactions reported in their disclosure statements. *See* Admin. Code §§ 3-703(1)(d), (g); Rule 4-01.

a) The Campaign must provide supporting documentation for the reported transactions listed on Exhibit XVI.

b) The Campaign failed to report the full names of the following contributors:

REPORTED CONTRIBUTOR	STATEMENT/ SCHEDULE/ TRANSACTION	DATE RECEIVED	AMOUNT
Fidelina, n/a	14/ABC/R0033804	10/12/13	\$10.00
Orquidia, n/a	14/ABC/R0033801	10/12/13	\$10.00

Previously Provided Recommendation

a) The Campaign must submit documentation for each transaction listed above.

b) This finding was identified after the Campaign’s response to the Draft Audit Report.

Campaign’s Response

a) In its Draft Audit Report response, the Campaign failed to fully document the listed transactions.

b) This finding was identified after the Campaign’s response to the Draft Audit Report.

Board Action

a – b) The Board has taken no further action on these matters other than to make this a part of the Candidate’s record with the Board.

11. Contribution/Matching Claims Documentation

Campaigns must report to the CFB every contribution as well as the full name, residential address, occupation, employer, and business address of the contributor. *See* Admin. Code §3-703(6)(a); Rule 3-03(c). A contribution must be in the true name of the contributor. This means that contributors may not make contributions in the name of someone else, and contributors may not be reimbursed by someone else for their contributions. Campaigns may not knowingly receive or report contributions given in the name of someone other than the true contributor. *See* New York State Election Law §14-120.

Campaigns are required to maintain documentation for all contributions. *See* Rule 4-01.

A “matchable contribution” is a contribution not greater than the applicable contribution limit, made by an individual New York City resident, which has been reported fully to the CFB. *See* Admin. Code §3-702(3); Rule 5-01(d).

The CFB staff reviewed the disclosure statements and backup documentation submitted by the Campaign. CFB investigators also contacted contributors to confirm information appearing on documentation. Based on reporting, information and documentation provided by the Campaign and/or contributors, the CFB staff has determined that the following contributions reported by the Campaign are not legitimate.

In May 2016, in response to news articles concerning contributions made by Sm-Ali Amanollahi and Primary One, LLC employees,⁷ CFB staff conducted a review of reported contributions from Mr. Amanollahi, his employees, and his associates. CFB staff identified eight reported contributions connected to Mr. Amanollahi, including four contributions claimed for match. A review of contribution backup documentation provided by the Campaign revealed that both the contribution cards and checks from the almost all of the reported contributors were completed in substantially similar handwriting.

On July 31, 2016 and August 2, 2016, CFB investigators attempted to contact the reported contributors, except for Mr. Amanollahi, at addresses reported by the Campaign or identified by the CFB. The investigators were able to interview two of the reported contributors: Angela Parra and Charalambos Anastassopoulos.

During the interview with Ms. Parra, CFB investigators showed her a copy of the check and contribution card associated with her contribution. Ms. Parra stated that the handwriting and signature on the check and card were her own. She also stated that Mr. Amanollahi asked her and several co-workers to make contributions and that she, Rafael Zepeda, and Jose Zepeda agreed to do so. She denied that she was reimbursed in any way. Ms. Parra also stated that she did not fill out any contribution cards or checks for anyone else. However, the handwriting that Ms. Parra identified as her own appears on the contribution cards and/or checks for all of the reported contributors, except for Jose Zepeda. (While Mr. Zepeda’s contribution to the Campaign does not contain the handwriting at issue, his contribution to Mr. de Blasio’s 2013 transition and inauguration entity (“TIE”) does. In addition, ten contributions made to the TIE, made by some of the same contributors and by individuals with the surname Amanollahi, contain the handwriting at issue.)

During the interview with Mr. Anastassopoulos, CFB investigators showed him a copy of the check associated with his contribution. Mr. Anastassopoulos indicated that he had signed the check but that someone else completed the other fields. All sections of the check contain the handwriting that Ms. Parra identified as her own. Mr. Anastassopoulos did not state whether he was present when the other fields on the check, including the dollar amount, were filled in and

⁷ *See, e.g.* “Federal Probe Eyes Possible Straw Donors to de Blasio Campaign, Sources Say,” DNAINFO (May 5, 2016), <https://www.dnainfo.com/new-york/20160505/glendale/federal-probe-eyes-possible-straw-donors-de-blasio-campaign-sources-say>.

refused to say who had done so. CFB investigators showed Mr. Anastassopoulos a copy of the check associated with another person's contribution and asked whether he could explain the handwriting similarities. Mr. Anastassopoulos stated that the handwriting did not matter because he signed the check.

Backup documentation submitted for all of the following reported contributors contains the handwriting Ms. Parra identified as her own. The conflict between Ms. Parra's statement that she did not complete cards or checks for anyone else and the apparent handwriting similarities, coupled with Mr. Anastassopoulos' statement that he did not fill in the check associated with his contribution and the fact that the handwriting similarities indicate that the reported contributors did not fill out their own checks, suggests that the following contributions were not made by the reported contributor:

REPORTED CONTRIBUTOR	STATEMENT/ SCHEDULE/ TRANSACTION	DATE RECEIVED	AMOUNT	NOTE
Amanollahi, Sm-Ali	14/ABC/R0037268	10/21/2013	\$4,950	(1)
Secreti, Joseph	14/ABC/R0037272	10/21/2013	\$4,950	(1)
Bruschi, Giuliano	14/ABC/R0037274	10/21/2013	\$4,950	(1)
Scopo, Ralph	14/ABC/R0037276	10/21/2013	\$4,950	(1)
Zepeda, Jose L	14/ABC/R0037284	10/21/2013	\$4,950	(1)
Anastassopoulos, Charalambos	14/ABC/R0037287	10/21/2013	\$4,950	(1)
Parra, Angela	15/ABC/R0039658	10/29/2013	\$2,500	(2)
Zepeda, Rafael	15/ABC/R0040689	11/4/2013	\$4,950	(1)
Total			\$37,150	

(1) The initial reported contribution was for \$5,000, which is in excess of the \$4,950 contribution limit. The Campaign subsequently issued a \$50 refund to the contributor.

(2) The reported contributor's check was returned for insufficient funds.

Previously Provided Recommendation

In a letter dated October 7, 2016, the CFB informed the Campaign that it must either:

- a. Disgorge funds in an amount equal to the total of the identified contributions, \$34,650,⁸ by submitting a bank check in that amount payable to the "New York Election Campaign Finance Fund;"⁹ or

⁸ The \$2,500 contribution from Angela Parra was returned for insufficient funds and was therefore not included in the amount specified to be disgorged.

⁹ The Campaign was directed to pay the amount of the contribution to the Public Fund because a return to the contributors is impracticable. *See* Rule 1-04(c).

- b. Provide a sworn and notarized verification letter from each of the eight reported contributors which:
 - i. States that the contributor made the contribution from his or her own funds; and
 - ii. Explains in detail the circumstances under which the contribution was made, including:
 1. Whether the handwriting on the contribution card or check associated with the reported contribution is his or her own;
 2. If not:
 1. The name of the person whose handwriting is present;
 2. Whether the contributor signed a blank check;
 3. Whether the handwritten information on the card or check were completed in his or her presence;
 4. Who determined the amount that would be contributed to the Campaign; and
 5. How and by whom the contribution was delivered to the Campaign.

Campaign's Response

This finding was identified after the Campaign's response to the Notice of Alleged Violations and Recommended Penalties. The Campaign disgorged the funds to the New York City Election Campaign Finance Fund on October 25, 2016.

Board Action

The Board has taken no further action on this matter other than to make this a part of the Candidate's record with the Board.

Expenditure Findings

12. Undocumented/Unreported Joint Expenditures

Campaigns are permitted to engage in joint campaign activities, provided that the benefit each candidate derives from the joint activity is proportionally equivalent to the expenditure. *See* Admin. Code § 3-715; Rule 1-04(p).

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

a) The Campaign failed to account for a joint expenditure for petition printing. Documentation provided to the CFB indicates that the Campaign appeared with Daniel Squadron, among other candidates, on petitions printed by NY Prints (see Exhibit XVII). Although the Campaign reported expenditures for petition printing, it did not provide documentation indicating that those petition costs were related to joint expenditures.

b) Documentation obtained by the CFB indicates that the Campaign engaged in joint campaign activity with the 2013 campaign of Andrew King (see Exhibit XVIII). Based on a review of the documentation and the Campaign's reporting, the Campaign did not report the joint campaign activity with Andrew King.

Previously Provided Recommendation

a – b) If the Campaign previously accounted for the joint activity described above in its reporting, it must identify the associated transactions reported by the Campaign by Transaction ID and provide documentation for the expenditures. If the Campaign did not report the expenditures, it must amend its disclosure statements to report the transactions. For expenditures that originated with the Campaign, the Campaign must also provide a methodology for the cost allocations for each campaign's share, and indicate whether the other campaign(s) have paid for their share(s) of the expenditure(s). If the other campaign(s) paid the Campaign (as opposed to paying the vendors), the Campaign must also identify by Transaction ID the incoming Other Receipts transactions. If the Campaign has not reported Other Receipts received, it must amend its disclosure statements to report the transaction(s). For expenditures that originated with another campaign, the Campaign must identify which campaign(s) originated the transaction and whether another campaign or the vendor was paid. If the Campaign did not yet pay for its share, it must report the transaction as an outstanding liability or an in-kind contribution. The Campaign must provide supporting documentation for its responses.

Campaign's Response

a) In its Draft Audit Report response, the Campaign acknowledged that it paid the listed vendor for petitions and did not directly dispute the claim that the Candidate appeared on petitions with

other candidates for New York City offices. However, the Campaign disputed the suggestion that this expenditure was a joint expenditure, stating that a candidate's appearance on a petition does not indicate that this is a joint expenditure because it does not show which of the listed candidates filed, claimed, or accepted the petitions. The Campaign makes no direct claim that it did not participate in this expenditure. The Campaign failed to provide documentation substantiating its position.

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign provided a copy of an invoice for this transaction as well as a letter from the CEO of NYPrints, Paul Bader, who explained the general system that his company uses to portion printing job expenses amongst all campaigns in all situations. However, the letter failed to explain the methodology used in this joint expenditure or to explain this expenditure in any specific detail and it is unclear what proportional share any of the campaigns listed in the documentation received or paid from this expenditure.

b) In its Draft Audit Report response, the Campaign stated that the listed palm card is not a joint expenditure because it did not authorize or in any way participate with the King campaign with this expenditure. However, CFB staff obtained an invoice that includes a line for a charge to the Campaign for \$164.10, out of a total expenditure for \$820.50. This indicates that the Campaign was billed separately for this expenditure and it appears that the Campaign has received an in-kind contribution.

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not dispute this finding.

Board Action

a – b) The Board found the Campaign in violation and assessed \$200 in penalties.

13. Expenditures – Not In Furtherance of the Campaign

Campaigns may only spend campaign funds for items that further the candidate's election. Campaigns must keep detailed records to demonstrate that campaign funds were used only for those purposes. *See* Admin. Code §§ 3-703(1)(d), (g); Rule 4-01. The law gives examples of the types of expenditures that are presumed to be campaign-related, although in certain circumstances expenditures of the types listed as appropriate may be questioned. Among the relevant factors are: the quality of the documentation submitted; the timing and necessity of the expenditure; the amount of the expenditure and/or all expenditures of a specific type in relation to the Campaign's total expenditures; and whether the expenditure is duplicative of other spending. The law also prohibits the conversion of campaign funds to personal use which is unrelated to a political campaign, and provides examples of expenditures that are not in furtherance of a campaign. *See* New York State Election Law §14-130; Admin. Code §§ 3-702(21), 3-703, and 3-710(2)(c); Rules 1-03(a), and 5-03(e), and Advisory Opinion No. 2007-3 (March 7, 2007). Expenditures not

demonstrated to be in furtherance of the candidate's election are considered "non-campaign related."

The Campaign reported the expenditures listed on Exhibit XIX which—based on the reporting and/or documentation—are non-campaign related.

Previously Provided Recommendation

The Campaign must explain how each expenditure listed is in furtherance of the Campaign, and provide supporting documentation. The explanation and documentation may include details of how, when, where, and by whom a good was used. For services, the documentation and explanation may include work product and/or additional details regarding how, when, where, and by whom the service was provided; and how the service was necessary. The Campaign must review the questioned transactions. Expenditures that are not in furtherance of the Campaign may increase the amount of public funds that must be repaid.

Additional findings were identified as a result of the Campaign's response to the Draft Audit Report.

Campaign's Response

The Campaign did not contest the findings related to The Milford, ABNY, or 1800Flowers in its Draft Audit Report response nor in its response to the Notice of Alleged Violations and Recommended Penalties.

The Campaign responded to the finding related to Gina Riggi in its response to the Draft Audit Report by stating that the expense was for the makeup of the Candidate and his family on the night of the general election in anticipation of Campaign events. However, personal grooming is not considered to be in furtherance of a campaign. *See* Admin. Code § 3-702(21)(b)(3). In response to the Notice of Alleged Violations and Recommended Penalties, the Campaign stated that this expense is inherently not personal grooming. The Campaign states that makeup is required before a television appearance to avoid an unflattering appearance and that because the Campaign filmed the event the expense is not for personal use. Advisory Opinion 2007-3 states, "...[E]xpenditures for personal items, such as clothing or toiletries are not permissible campaign expenditures, even if they arguably have some ancillary campaign-related benefit." Although this statement does not specifically use makeup as an example, it demonstrates that even though the Campaign has argued that the service was for the Candidate and his family's appearance at a particular campaign event, personal grooming, which is (and has been) reasonably construed to include makeup-related services is still not permissible.

All other findings were identified as a result of the Campaign's response to the Draft Audit. The Campaign did not respond to a document request for an explanation related to an American Airlines expenditure and did not address this finding in its response to the Notice of Alleged Violations and Recommended Penalties.

In its response to the Draft Audit Report, the Campaign provided an explanation for an expenditure to Westin Diplomat Resort, stating that it was for the Candidate to attend a building trades unions conference in Florida. However, the Campaign did not explain how this conference related to the Campaign and did not provide evidence that the Campaign attended the event. It did not address this finding in its response to the Notice of Alleged Violations and Recommended Penalties.

For expenditures to Enterprise and Days Inn Santa Clara, the Campaign stated in its response to the Draft Audit Report that the Candidate attended “finance prospecting meetings.” However, there was only one reported contribution from a California resident during that month, and the Campaign did not demonstrate that the trip was campaign-related. The Campaign did not address this finding in its response to the Notice of Alleged Violations and Recommended Penalties.

In its response to the Draft Audit Report, the Campaign stated that a Delta Air expenditure was for airfare for the Candidate’s son to attend a National Action Network march and rally in Washington D.C. with the Candidate. In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign disputed the finding and stated that the Candidate’s son has always been an important part of the Candidate’s personal narrative and, because this trip was for both the Candidate and his son to attend the 2010 National Action Network’s march in DC, it cannot be considered a personal expense. However, the presence of the Candidate’s son at a campaign-related event alone does not constitute sufficient evidence that an expenditure is campaign-related.

The expenditure to Progress Printing Corp. was added as a result of the Campaign’s response to the Notice of Alleged Violations and Recommended Penalties.

Board Action

The Board found the Campaign in violation and assessed \$806 in penalties.

14. Expenditures – Improper Post-Election

After the election, campaigns may only make disbursements for the preceding election, or for limited, routine activities of nominal cost associated with winding up a campaign and responding to the post-election audit. Campaigns have the burden of demonstrating that post-election expenditures were for the preceding election or the limited and routine activities described in the law. *See* Admin. Code § 3-710(2)(c); Rule 5-03(e)(2).

Each expenditure listed on Exhibit XX is an improper post-election expenditure due to the timing, amount and/or purpose reported by the Campaign.

Previously Provided Recommendation

The Campaign must explain how each expenditure was for the preceding election, or was a routine and nominal expenditure associated with winding up the Campaign, and must provide supporting documentation. Expenditures that are not proper post-election expenditures may increase the amount of public funds that must be repaid.

Additional findings were identified after the Campaign's response to the Draft Audit Report due to additional disclosures filed with the Board of Elections.

Campaign's Response

In its responses to the Draft Audit Report and Notice of Alleged Violations and Recommended Penalties, the Campaign stated that the expenditures to Brooklyn Bowl and Wythe Hotel were for one post-election staff party held on November 12, 2013. However, certain Brooklyn Bowl invoices listed the event date as November 16, 2013, indicating that there was more than one post-election staff party. According to Rule 5-03(e)(2)(ii), campaigns may only hold one post-election event for staff, volunteers, and/or supporters within thirty days of the election. In subsequent document submissions after its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign submitted an email from one of its consultants, Bill Hyers, who confirmed that there was only one post-election event held at Brooklyn Bowl. It also provided links to websites listing a different event at Brooklyn Bowl on the evening of November 16, 2013, stating that there could not have been a Campaign event at that venue since an unrelated event occurred at the same venue at the same time. The Campaign did not provide confirmation from the vendor to confirm its response.

The Campaign stated that the expenditure to Wythe Hotel was for hotel rooms for staff on the night of the November 12, 2013 event. This expenditure is excessive, beyond what would be considered permissible for a post-election event, given the other expenditures involved with the post-election party, and because the Campaign failed to show how it was in furtherance of the campaign. In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign stated that the cost of this expenditure was not excessive because the cost was "nominal" in relation to the overall size of the Campaign. However, the Campaign failed to explain how hotel rooms relate to a post-election party held in a separate location. In addition, the cost of an expenditure is not relevant to whether or not an expenditure is permissible. While the Campaign viewed the use of "excessive nature" to refer to the cost, the rental of off-site hotel rooms goes beyond the scope of a post-election event.

In its response to the Draft Audit Report, the Campaign stated that the expenditures to 404, Café Metro, and Metro Furniture were for a reception for volunteers on December 15, 2013, separate from the November 12, 2013 post-election event. These expenditures were also impermissible, as

the Campaign already had a post-election event that was considered to be permissible under Rule 5-03(e)(2)(ii). In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign disputed the findings and stated that these expenditures were for an additional “thank you” event and that based on its interpretation of the Act and Rules, it is permissible to hold separate events for different categories of Campaign supporters. However, CFB has consistently read the Act and Rules to permit only a single post-election event. For example, the 2013 Campaign Finance Handbook specifies on page 59, “a single post-election event for staff, volunteers, and/or supporters held within 30 days of the election” is permissible.

The Campaign further stated in its response to the Notice of Alleged Violations and Recommended Penalties, “Finally, we respectfully submit it is the Notice that is unreasonable in recognizing that only \$9,000 is permissible as the cost of a post-election thank you event for a victorious mayoral campaign in New York City.” The Campaign should note that numerous expenditures incurred in connection with the November 12, 2013 event were permissible, including payments for a band (\$3,500), photo booth (\$1,575), photography (\$500), and staff transportation (\$205).

In its response to the Draft Audit Report, the Campaign stated that the expenditure to Livestream and \$4,750.71 of expenditures to AKPD were for a “thank you” video that was available on the Campaign website for one month. However, a thank you video is not a permissible post-election expenditure. In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign stated that it was a nominal wind-up expense in the same vein as the allowed “thank you” notes. However, the Campaign already reported expenditures for a “thank you” note (Transaction 16/N/R0042199), which were permitted as a nominal wind-up expenses. Therefore, the video expenditures are duplicative and not permissible.

In its response to the Draft Audit Report, the Campaign stated that the OfficeDesigns.com expenditure was the replacement cost of a broken chair in a consultant’s office. In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign disputed the finding, however it did not explain how this expenditure is related to winding-up the Campaign. In addition, it did not explain why the shipping address for the replacement chair was to a consultant’s office (Greenlight Media Strategies), to which the Campaign did not report any expenditures.

In its responses to the Draft Audit Report and Notice of Alleged Violations and Recommended Penalties, the Campaign disputed the findings related to Google and stated that the Campaign would not have been able to respond to the post-election audit process without the files on its paid Google email account. However, the Campaign failed to explain why this data could not have transferred offline at the end of the election instead of paying a recurring fee.

In its response to the Draft Audit Report, the Campaign stated that the expenditures to AT&T Mobility were related to fees for the Candidate’s iPad. However, it did not explain how this was a nominal cost related to winding up the Campaign. It did not address this finding in its response to the Notice of Alleged Violations and Recommended Penalties.

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign provided a copy of the invoice to Apple for a new laptop, which the campaign explained was for the use of a staff member, Sonja Chojnacki, whose personal computer that had previously been used for campaign-purposes became dysfunctional. CFB staff was unable to determine if the full value of the laptop was a permissible post-election expenditure. The Campaign demonstrated that Ms. Chojnacki performed extensive work on the post-election audit and therefore needed computer access. Therefore, this expenditure was not included in the penalty calculation.

In its response to the Draft Audit Report, the Campaign provided a contract for Hilltop Public Solutions and stated that the vendor was responsible for “post-election wind-up, custodial, and audit space and services.” However, the Campaign did not justify the large, recurring fees paid to Hilltop nor explain how these services were necessary and not duplicative or overlapping with other vendors that it paid for post-election services. In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign disputed the findings related to Hilltop Public Solutions by reiterating the terms of the provided contract. For the general consulting fees, the Campaign stated that Campaign staff and legal representation consulted with the principals of Hilltop Public Solutions at every phase of the post-election audit process and that they are “uniquely qualified” to serve as the post-election consultant for the Campaign. However, the Campaign did not provide a more thorough breakdown of the costs associated with the contract, or any further documentation to justify over \$100,000 worth of expenditures to a single organization in a timeframe of less than two years, when the Campaign’s own reporting and documentation has indicated that Ms. Chojnacki completes most of the post-election audit work.¹⁰ Although it may be reasonable to believe that she was supervised by Hilltop, the amount of the expenditures to Hilltop still have not been substantiated, especially considering the extent to which attorney invoices show significant consulting between that firm and Ms. Chojnacki, not Hilltop.

Board Action

The Board found the Campaign in violation and assessed \$21,159 in penalties.

15. Expenditure Documentation

Campaigns are required to provide copies of checks, bills, or other documentation to verify all transactions reported in their disclosure statements. *See* Admin. Code §§ 3-703(1)(d), (g); Rule 4-01.

a) The Campaign must provide supporting documentation for the undocumented advance purchases listed below:

¹⁰ The portion of the Hilltop expenditures that are impermissible do not include record storage or facility fees, since those fees relate to Ms. Chojnacki’s post-election audit work.

ADVANCER NAME	VENDOR	STATEMENT/ SCHEDULE/ TRANSACTION ID	PURCHASE DATE	AMOUNT
Bennett, Robert	Foto Care Ltd.	16/P/R0042251	11/06/13	\$166.58

b) The Campaign must provide documentation for the expenditure refunds listed below:

NAME	TRANSACTION TYPE	STATEMENT/ SCHEDULE/ TRANSACTION	INCURRED/RECEIVED/ REFUNDED/PAID DATE	AMOUNT
Lincoln Square Neighbor	Expenditure Refund	16/L/R0042529	06/05/13	\$100.00
The Roosevelt Hotel	Expenditure Refund	16/L/R0042257	12/27/13	\$714.89

Previously Provided Recommendation

- a) The Campaign must submit bills, receipts, or invoices for each listed advance purchase.
- b) The Campaign must submit documentation as indicated. The Campaign must submit copies of the amended invoice or receipt for each refund, or a letter or email from the vendor explaining the details of the refund, including the amount refunded and why. For refunds issued via check, the Campaign must provide a copy of the vendor's check.

Campaign's Response

a – b) In its Draft Audit Report response, the Campaign did not provide sufficient documentation for the listed transactions.

Board Action

a – b) The Board has taken no further action on this matter other than to make this a part of the Candidate's record with the Board.

Public Matching Funds Findings

16. Return of Final Bank Balance

Campaigns are required to return excess public funds after the election. *See* Admin. Code § 3-710(2)(c); Rule 5-03(e). Public funds are only intended to be used for campaign expenditures, and not every campaign will use all of the public funds it received. This may occur when additional contributions were received or a campaign spent less than anticipated. To ensure that excess public funds are not wasted, until excess public funds have been repaid the only disbursements allowed are those for the preceding election and routine post-election expenditures. Routine post-election expenditures are those involving nominal cost associated with winding up a campaign and responding to the post-election audit. *See* Rule 5-03(e)(2)(i), (ii).

The remaining balance in the Campaign's bank accounts was \$485.02, according to the Campaign's November 30, 2016 bank statement. The Campaign must return \$485.02 to the Public Fund as its final bank balance.

Previously Provided Recommendation

The Campaign must respond to all findings in this Draft Audit Report, including providing additional bank statements if requested. The Campaign must repay the final bank balance above with a check payable to the "New York City Election Campaign Finance Fund." If the Campaign disagrees with the amount, it must provide documentation and explanation to show why the amount is not correct. The Campaign may reduce the amount it must return to the Public Fund by proving that outstanding loans or outstanding liabilities timely reported on Statement 16 and not previously documented are still outstanding.

Campaign's Response

In its Post-Election Repayment Notice response, the Campaign provided subsequent bank statements that demonstrate the current remaining balance in the Campaign's bank accounts was \$485.02 according to the Campaign's November 30, 2016 bank statement.

Board Action

The Board determined that the Campaign must repay \$485.02 to the Public Fund.

Other Findings

17. Commingling of Funds

All campaign receipts must be deposited into an account listed on the candidate’s Certification and receipts accepted for one election may not be commingled with receipts accepted for any other election. *See* Rules 1-03(a)(2) and 2-06(b). Funds accepted by a Transition and Inauguration Entity (“TIE”) cannot be transferred to a political committee authorized by the Candidate and can only be used to make expenditures for transition or inauguration into office. *See* Admin. Code §3-801(2)(a). In addition, unspent campaign funds may not be used for transition and inauguration activities. *See* Rule 5-03(e)(2)(ii).

a) The Campaign made expenditures totaling \$3,326.75 on Exhibit XXI that cannot be allocated to a particular committee as a result of commingling of activity between the 2009 and 2013 campaigns.¹¹

b) Friends of Bill de Blasio-2009 contacted the CFB on August 2, 2010 and stated that it made expenditures after January 11, 2013 that should be attributed to New Yorkers for de Blasio. The Campaign was advised that New Yorkers for de Blasio should reimburse Friends of Bill de Blasio-2009 by check. The campaign was also advised to maintain documentation supporting the expenditures reimbursed by that payment, including contracts, invoices, receipts, and materials. New Yorkers for de Blasio reported the following expenditures to Friends of Bill de Blasio-2009 as reimbursements:¹²

NAME	STATEMENT/ SCHEDULE/ TRANSACTION	DATE	AMOUNT	NOTE
Friends of Bill de Blasio-2009	2/F/R0005521	09/29/10	\$11,321.10	
Friends of Bill de Blasio-2009	2/F/R0006384	01/10/11	\$2,815.00	
Friends of Bill de Blasio-2009	3/F/R0007975	07/11/11	\$1,940.00	(1)
Friends of Bill de Blasio-2009	4/F/R0010623	01/11/12	\$416.50	

See also Finding #17 d) and Finding #17 f) below.

(1) In a memo dated November 11, 2011, the Campaign determined that \$19.40 of this reimbursement was actually owed back to New Yorkers for de Blasio, representing the portion of website expenses allocated to raising funds for Friends of Bill de Blasio-2009.

¹¹ *See* also Friends of Bill de Blasio-2009 Final Audit Report Finding #10 a). Following the issuance of the Final Audit Report for the 2009 committee, the Campaign provided documentation in response to expenditure limit calculation notices, which reduced the amount that could not be allocated from \$32,620.37 to \$3,326.75.

¹² *See* also Friends of Bill de Blasio-2009 Final Audit Report Finding #10 b).

c) On January 12, 2011, the Campaign notified CFB staff that \$36,030.00 in funds that were intended for Friends of Bill de Blasio-2009 were deposited into the New Yorkers for de Blasio bank account (see Transaction ID 2/E/R0006231). New Yorkers for de Blasio reported a reimbursement to Friends of Bill de Blasio-2009 on January 11, 2011 (see Transaction ID 4/H/R0008555). In response to CFB requests to both the 2013 and 2009 campaigns, the Campaign submitted a memo dated January 17, 2011 that listed the misdeposited contributions (see Exhibit XXII). However, neither campaign provided a copy of the backup documentation for these contributions as requested. Therefore, CFB staff is unable to confirm that the contributions were actually intended for the 2009 campaign. Although New Yorkers for de Blasio reimbursed the funds, the funds were commingled with receipts accepted for another election.¹³

d) The Campaign contacted the CFB on September 22, 2011, and stated that NGP mistakenly debited a payment from the Friends of Bill de Blasio-2009 bank account that should have been debited from the New Yorkers for de Blasio account. New Yorkers for de Blasio reimbursed Friends of Bill de Blasio-2009 for this expenditure (see Transaction ID 4/F/R0015983).¹⁴

e) The Campaign reported a \$5,513.83 reimbursement from Friends of Bill de Blasio-2009 (see Transaction ID 4/E/R0008556). CFB staff were unable to identify the disbursement on the Friends of Bill de Blasio-2009 bank statements and were also unable to identify the deposit of funds into the New Yorkers for de Blasio bank account. In addition, the Campaign did not provide a copy of the cancelled reimbursement check.¹⁵ There was an additional reimbursement from Friends of Bill de Blasio-2009 for \$7,418.28 on August 8, 2013 (see Transaction ID 11/E/R0027167).

f) New Yorkers for de Blasio reported a \$305.05 reimbursement owed to Friends of Bill de Blasio-2009 in July 2011 (see Transaction ID 6/F/R0015967). A Campaign response dated August 13, 2013 indicated that this amount was the difference of the total shared expenses paid by New Yorkers for de Blasio and a mistaken debit for \$2,490.00 made in March 2012 that should have been debited from the account of New Yorkers for de Blasio, and not Friends of Bill de Blasio-2009. The Campaign indicated that the total amount paid by the 2013 committee for the shared rent expenditures was \$12,356.02 and the share for Friends of Bill de Blasio 2009 was 4.2%. However, based on the amounts on the invoices submitted with the Campaign's August 13, 2013 response, the total amount paid for rent by the 2013 Campaign was \$9,364.80. Therefore, 4.2% of the \$9,364.80 paid by New Yorkers for de Blasio is \$393.32. In addition, the committees incurred shared expenditures for Emma Wolfe's fees for fundraising and budget services. The committees split the costs equally. New Yorkers for de Blasio paid a total of \$3,332.00, thus Friends of Bill de Blasio-2009 owed New Yorkers for de Blasio \$1,660.00. Therefore, \$1,666.00 plus \$393.32, minus the \$2,490.00 mistaken debit referenced above, equals \$430.68. Based on this calculation, \$430.68 is the difference owed by the 2013 committee to the 2009 committee, not \$305.05.

¹³ See also Friends of Bill de Blasio-2009 Final Audit Report Finding #9 b).

¹⁴ See also Friends of Bill de Blasio-2009 Final Audit Report Finding #10 c).

¹⁵ See also Friends of Bill de Blasio-2009 Final Audit Report Finding #10 d).

g) The New Yorkers for de Blasio November 2011 bank statement shows two deposits from the Friends of Bill de Blasio-2009 merchant account ending in 0990, totaling \$1,050.00. The Campaign has not previously addressed this issue. *See* Exhibit XXIII.

h) The Campaign provided a memo from the de Blasio Transition Committee, the Candidate’s 2013 TIE, stating that NGP VAN services were shared by the Campaign and the TIE from November 1, 2013, to December 1, 2013. The memo states that the cost of the NGP VAN services were split between the two entities based on the number of contributions received by each entity. However, the costs should not have been split, since the Campaign would have had to use and pay for NGP VAN’s services regardless of the existence of the TIE.

i) In July 2013, Campaign staff notified CFB staff that the following contributions were misdeposited into the 2009 committee bank account but that they were intended for the 2013 committee. The Campaign originally reported the total amount of these contributions as a Transfer-in from the Friends of Bill de Blasio-2009 committee (Transaction ID 4/G/R0010617). In a notice following the Campaign’s Compliance Visit, the Campaign was told it must amend its disclosure statements to report the transactions as contributions and delete the transfer-in transaction. Additionally the Campaign was required to provide documentation showing that the reported contributions were intended for the 2013 committee. The Campaign only deleted the transfer-in. It failed to report and document the underlying contributions. *See* also Finding #1 b).

NAME	DATE	AMOUNT
Harding, Clayton	11/02/11	\$175.00
Biberaj, Ken	11/02/11	\$175.00
Puth, Leslie	11/04/11	\$500.00
Yang-Lewis, Tony	11/04/11	\$175.00
Lancia, Thomas	11/04/11	\$350.00
Liberto, Frank	11/04/11	\$175.00
Siegel, Bridget	11/06/11	\$175.00
Total		\$1,725.00

j) In a memo dated August 9, 2011, related to a reimbursement of New Yorkers for de Blasio (see also Finding #17 e)), the Campaign stated that the storage space rented from Manhattan Mini Storage was only being used by Friends of Bill de Blasio-2009. Most of the expenditures made by New Yorkers for de Blasio were reimbursed by Friends of Bill de Blasio-2009, with the exception of the items listed below, which cannot be identified in any of the reimbursements:

NAME	PAID DATE	STATEMENT/ SCHEDULE/ TRANSACTION ID	AMOUNT
Manhattan Mini Storage	10/06/10	2/F/R0006112	\$57.00
Manhattan Mini Storage	01/05/11	2/F/R0006376	\$56.00
Manhattan Mini Storage	08/03/11	4/F/R0008493	\$59.00
Total			\$172.00

Previously Provided Recommendation

If the Campaign disagrees with this finding, it may provide an explanation and documentation to demonstrate that commingling did not occur.

a) If the Campaign disagrees with the attribution of expenditures in the exhibit, for each transaction it must provide a detailed explanation of when the good and/or service was received, used, or rendered and provide supporting documentation.

b) The Campaign was previously informed of this item. No further action is required on the part of the Campaign; however, the Campaign may be found in violation and assessed penalties. If findings of violation and/or penalties are recommended, the Campaign will receive separate notice of the recommendation and an opportunity to respond.

c) The Campaign must provide copies of the backup documentation for the misdeposited funds.

d) The Campaign was previously informed of this item. No further action is required on the part of the Campaign; however, the Campaign may be found in violation and assessed penalties. If findings of violation and/or penalties are recommended, the Campaign will receive separate notice of the recommendation and an opportunity to respond.

e) For the \$5,513.83 reimbursement, the Campaign must provide a copy of the front/back of the cancelled reimbursement check or other documentation demonstrating the check was deposited into the Campaign's account. For the \$7,418.28 reimbursement, no further action is required.

f) The Campaign must account for the difference in the documentation provided and the reimbursement reported and provide documentation to support the response.

g) The Campaign must explain why funds from the merchant account of Friends of Bill de Blasio-2009 were deposited into the New Yorkers for de Blasio account. The Campaign must also provide a detailed list of the underlying contributions comprising the deposit(s) and submit copies of the backup documentation for each contribution.

h) The Campaign must explain why New Yorkers for de Blasio shared services with the TIE instead of creating a new NGP VAN account and why the costs were split. The Campaign must

explain why sharing the expense, along with the reimbursement by the TIE to the Campaign of its share of the expense, should not be considered commingling. The Campaign must also describe how it tracked the contributions intended for the 2013 committee versus the TIE when the entities were using the same service to collect contributions.

i) This finding was identified after the Campaign's response to the Notice of Alleged Violations and Recommended Penalties.¹⁶

j) This finding was identified after the Campaign's response to the Notice of Alleged Violations and Recommended Penalties.

Campaign's Response

a) In its Draft Audit Report response, the Campaign stated that the CFB cites the 14 listed transactions, from February 2, 2010 to December 5, 2011, in the 2009 campaign's Final Audit Report and the Campaign contests the fact that the CFB is citing the findings here as well but failed to provide any other documentation or explanation.

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign states that this aspect of the overall finding cannot be cited for two reasons. One, the Campaign states that expenditures are unrelated to commingling because commingling is only caused by contributions. Two, the Campaign states that because the FBD for the Candidate's 2009 committee addressed this issue and these transactions the CFB cannot address them again here. However, the Candidate's 2009 committee and the Campaign are two separate entities and both are responsible for violating the Act in this situation.

b) In its Draft Audit Report response, the Campaign states: "the CFB sanctioned the 2009 committee for "commingling" (i.e., making expenditures attributable to the 2013 election). The Committee did not violate the Act by appropriately reimbursing the 2009 committee for expenditures attributable to the 2013 election. See Rule 5-01(n)(1) (expressly permitting transfers to a different political committee from an account into which contributions for the current covered election are deposited)."

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not address this section of the finding.

c) In its Draft Audit Report response, the Campaign provided receipts from the Campaign's credit card processor showing the contributions, which the Campaign states were intended for the 2009 committee. The Campaign also provided emails between a campaign worker and representatives from NGP that detailed the fact that certain contributions made through the 2009 website¹⁷ were

¹⁶ The Campaign was notified of this finding on August 8, 2013. It stated that it had amended its disclosure statement, but it did not report the underlying contributions or provide documentation as requested.

¹⁷ There was no change in URL for the 2009 to 2013 campaign; both campaigns utilized www.billdeblasio.com. CFB records indicate that the website stated, "Paid for by Friends of Bill de Blasio

deposited into the Campaign's PayPal account. The emails state that the account was switched on May 11 (no year was provided, however the emails were dated in January 2011, so it is assumed to have occurred on May 11, 2010). The auto-generated contributor email contributions were provided for 27 out of 30 contributions listed as being deposited in the Campaign's January 17, 2011 memo, all of which indicated 2009 as the election cycle. The Campaign stated that the three undocumented contributions totaling \$7,925 (from Elizabeth Sackler, Jacob Elbogen, and Tondra Lynford)¹⁸ were discovered to have been intended for, and correctly deposited, in the 2013 Campaign account, although backup documentation was not provided to demonstrate this assertion. The Campaign correctly acknowledged that this amount should be subject to Rule 5-01(n) given the circumstances that it has described, however the fact that the Campaign transferred-out contributions intended for 2013 that it believed at the time to be for 2009 is indication in itself of commingling. Due to the extent of the commingling, it was not until more than four years later that the Campaign was able to fully identify the contributions intended for the 2009 committee versus the contributions intended for the Campaign. *See* also Finding #1 b).

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign resubmitted the documentation provided with the Draft Audit Report response and stated that because this issue was brought to the attention of the CFB by the Campaign, no penalty should be assessed for this finding.

d) In its Draft Audit Report response, the Campaign states: "the CFB sanctioned the 2009 committee for "commingling" (i.e., making expenditures attributable to the 2013 election). The Committee did not violate the Act by appropriately reimbursing the 2009 committee for expenditures attributable to the 2013 election. See Rule 5-01(n)(1) (expressly permitting transfers to a different political committee from an account into which contributions for the current covered election are deposited)."

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign again reiterated the above explanation.

e) In its Draft Audit Report response, the Campaign amended Other Receipt (Transaction ID 4/E/R0008556) from \$5,513.83 to \$10,005.00 and provided bank statements for the 2009 and 2013 committee accounts, which the Campaign states demonstrate the undocumented repayment listed on the exhibit. The Campaign stated that the 2009 reimbursement was made via check #2076, for \$10,005. However, the Campaign failed to provide an image of the cancelled check, as specifically requested in the Draft Audit Report. For that reason, the transaction listed as undocumented remains undocumented. The Campaign explained that the \$10,005.00 reimbursement consisted of \$3,700 in contributions intended for the 2013 account that were misdeposited into the 2009 account and \$6,304.63 in expenditures (later adjusted to \$5,509.33 in

2009" through at least September 2010. The site switched to solicitations for New Yorkers for de Blasio at some point in 2011, although the exact time cannot be verified.

¹⁸ These are unreported contributions. *See* Finding #1 b). With the unreported contributions, Elizabeth Sackler and Tondra Lynford would have contributed over the maximum contribution limit. However, because the funds were disgorged from the Campaign's account prior to notification from the CFB (via the transfer-out), no violation has been cited.

attributable expenditures). Because of the adjustment in attributable expenditures, Friends of Bill de Blasio has also over-reimbursed New Yorkers for de Blasio by \$795.67. *See* also Findings #1 b) and #1 d).

In response to a pre-election request, the Campaign identified 13 contributions totaling \$3,550.00 that it stated were part of the \$3,700.00 in misdeposited contributions. The Campaign reported the underlying contributions and provided documentation demonstrating that the contributors intended to contribute to New Yorkers for de Blasio. The Campaign failed to identify the remaining \$150.00 of the \$3,700.00 in misdeposited contributions as requested in the Campaign's Compliance Visit letter dated August 8, 2013, and therefore CFB staff cannot determine whether the contribution(s) had been reported and documented properly. *See* also Finding #1 b).

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign provided a copy of the cancelled check for check #2076.

f) In its Draft Audit Report response, the Campaign states that there is no outstanding liability because the Campaign owed \$233.14 to the 2009 committee and has repaid \$305.05. The difference between the Campaign's attribution of payment and the CFB's stems from the Campaign's assertion that total rent expenditures for Disclosure Statement #5 are \$14,306.23. However, the Campaign only submitted sufficient documentation for \$9,364.80 in rent expenditures during that period (for Transaction IDs 10677, 10881, 11149, 11722, 18514). In its July 16, 2012 memo, the Campaign originally stated that the total rent for these months was \$12,356.02. It has not accounted for this difference in calculation. In response to the Draft Audit Report, the Campaign also failed to include the \$1,666 reimbursement owed to the 2013 campaign for Emma Wolfe's services. The Campaign must explain and provide documentation for its new attribution.

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign mentions but does not dispute this finding.

g) In its Draft Audit Report response, the Campaign states: "As reported in its January 2012 SBOE disclosure statement, the 2009 committee reported receipt of no contributions by credit card or in such small amounts during that six month reporting period."

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign does not dispute this finding but states that the amount is too small to be considered material and asks for this finding to be considered de minimis by the CFB.

h) In its Draft Audit Report response, the Campaign lists payments to NGP paid by both the Campaign and the TIE account. The Campaign also explains that, due to the short time-span of a TIE account, the TIE account is required to use resources in conjunction with the Campaign's winding-down activities in order to reduce spending and preserve more of the Campaign's final bank balance for return to the Public Fund.

i – j) This finding was identified after the Campaign's response to the Notice of Alleged Violations and Recommended Penalties.

Board Action

a – f) The Board found the Campaign in violation, but did not assess a penalty.¹⁹

g) The Board found the Campaign in violation and assessed \$250 in penalties.

h – j) The Board has taken no further action on these matters other than to make them a part of the Candidate's record with the Board.

¹⁹ The Friends of Bill de Blasio-2009 campaign was penalized \$10,000 for these instances of commingling.

We performed this audit in accordance with the audit responsibilities of the CFB as set forth in Admin. Code § 3-710. We limited our review to the areas specified in this report's audit scope.

Respectfully submitted,



Signature on original

Sauda S. Chapman

Director of Auditing and Accounting

Date: March 7, 2017

Staff: Danielle Willemin, CFE

Sonia M. Simões

**New York City Campaign Finance Board
Campaign Finance Information System
Transaction Summary Report
Appendix 1**

Candidate: de Blasio, Bill (ID:326-P)**Office:** 1 (Mayor)**Election:** 2013

1. Opening cash balance (All committees)		\$0.00
2. Total itemized monetary contributions (Sch ABC)		\$11,194,102.79
3. Total unitemized monetary contributions		\$0.00
4. Total in-kind contributions (Sch D)		\$24,918.46
5. Total unitemized in-kind contributions		\$0.00
6. Total other receipts (Sch E - excluding CFB payments)		\$74,042.25
7. Total unitemized other receipts		\$0.00
8. Total itemized expenditures (Sch F)		\$13,653,084.63
Expenditure payments	\$13,566,835.40	
Advance repayments	\$86,249.23	
9. Total unitemized expenditures		\$0.00
10. Total transfers-In (Sch G)		\$0.00
Type 1	\$0.00	
Type 2a	\$0.00	
Type 2b	\$0.00	
11. Total transfers-out (Sch H)		\$36,030.00
Type 1	\$0.00	
Type 2a	\$0.00	
Type 2b	\$36,030.00	
12. Total loans received (Sch I)		\$0.00
13. Total loan repayments (Sch J)		\$0.00
14. Total loans forgiven (Sch K)		\$0.00
15. Total liabilities forgiven (Sch K)		\$0.00
16. Total expenditures refunded (Sch L)		\$145,760.79
17. Total receipts adjustment (Sch M - excluding CFB repayments)		\$660,185.56
18. Total outstanding liabilities (Sch N - last statement submitted)		\$31,623.88
Outstanding Bills	\$25,396.98	
Outstanding Advances	\$6,226.90	
19. Total advanced amount (Sch X)		\$0.00
20. Net public fund payments from CFB		\$3,972,196.00
Total public funds payment	\$3,994,496.00	
Total public funds returned	(\$22,300.00)	
21. Total Valid Matchable Claims		\$715,122.00
22. Total Invalid Matchable Claims		\$208,807.00
23. Total Amount of Penalties Assessed		\$47,778.00
24. Total Amount of Penalty Payments		\$47,778.00
25. Total Amount of Penalties Withheld		\$0.00

Exhibit I
New Yorkers for de Blasio
Unreported Transactions
(see Finding #1b)

Debits

Payee	Account	Check No./ Transaction	Date	Amount	Notes
Unknown	6460	1074	02/18/11	\$400.00	
Unknown	6460	Debit	12/30/11	\$4,950.00	
Unknown	2884	American Express Refund	07/01/12	\$500.00	(1), (2), (3)
Unknown	2884	American Express Refunds- 2	11/01/12	\$5,125.00	(1), (2)
Unknown	2884	American Express Refund	12/01/12	\$1,000.00	(1), (2)
Siegel, Abraham	6460	Debit	12/20/12	\$1,200.00	(4)
ADP	6460	Debit	04/25/13	\$1,033.79	
Unknown	2884	American Express Refund	08/01/13	\$2,500.00	(1), (2)
Total				<u>\$16,708.79</u>	

Credits

Payer	Account	Check No./ Transaction	Date	Amount	Notes
Levy, Michael	N/A	Monetary Contribution	Unknown	\$2,000.00	(5), (6)
Moss, Jeremy	N/A	Monetary Contribution	Unknown	\$600.00	(5), (6)
Williamson, Richard	N/A	Monetary Contribution	Unknown	\$240.00	(5), (6)
Mehrotra, Sandeep	N/A	Monetary Contribution	Unknown	\$400.00	(5), (6)
Sackler, Elizabeth	6460	Monetary Contribution	12/07/10	\$2,475.00	(7)
Lynford, Tondra	6460	Monetary Contribution	12/08/10	\$4,950.00	(7)
Elbogen, Jacob	6460	Monetary Contribution	12/14/10	\$500.00	(7)
Unknown	6460	Monetary Contribution	01/09/11	\$150.00	(8)
Harding, Clayton	6460	Monetary Contribution	11/02/11	\$175.00	(9)
Biberaj, Ken	6460	Monetary Contribution	11/02/11	\$175.00	(9)
Puth, Leslie	6460	Monetary Contribution	11/04/11	\$500.00	(9)
Yang-Lewis, Tony	6460	Monetary Contribution	11/04/11	\$175.00	(9)
Lancia, Thomas	6460	Monetary Contribution	11/04/11	\$350.00	(9)
Liberto, Frank	6460	Monetary Contribution	11/04/11	\$175.00	(9)
Siegel, Bridget	6460	Monetary Contribution	11/06/11	\$175.00	(9)
Total				<u>\$13,040.00</u>	

Exhibit I
New Yorkers for de Blasio
Unreported Transactions
(see Finding #1b)

Notes:

- (1) *See* also Finding #10 a).
- (2) The exact refund date for the transaction(s) could not be discerned from the merchant account statement. However, the refund occurred during the month of the date listed.
- (3) Three American Express refunds appear on the merchant account statement for July 2012. One refund of this amount has not been reported.
- (4) In its Draft Audit Report response, the Campaign provided a copy of backup documentation for this transaction. However, the documentation provided was actually for a different refund, TID 16/M/R0015730. Only one refund has been reported to Mr. Sieger (also reported as Abraham Siegel previously), however the Campaign has provided copies of two separate cashier's checks for this contributor. One cashier's check is dated December 20, 2012 and one is dated January 10, 2013.
- (5) The Campaign provided documentation for this receipt but did not report the contribution.
- (6) This contribution appears on an intermediary statement provided by the Campaign. However, it was not reported. *See* Exhibit Ia and Finding #9 c).
- (7) This unreported contribution was identified in the Campaign's supplemental response to its Draft Audit Report. This is one of three contributions that the Campaign initially reported as part of a group of contributions deposited into the 2013 account that the Campaign stated was actually intended for the 2009 account, which totalled \$36,030. The Campaign later stated that the three contributions were actually correctly deposited into the 2013 account. However, the Campaign then failed to report those contributions as required. *See* also Finding #17 c). As these transactions were not cited in the Notice of Alleged Violations and Recommended Penalties, they are not subject to penalty.
- (8) The Campaign stated in a memo dated January 17, 2011, that \$3,700.00 in misdeposited contributions were erroneously deposited into the Friends of Bill de Blasio-2009 account, when they were actually intended for the New Yorkers for de Blasio account. The misdeposited contributions should have been reported as itemized contributions, not as an Other Receipt (see Transaction ID 4/E/R0008556). The Campaign reported \$3,550.00 of the \$3,700.00 in misdeposited contributions on Schedule ABC, however the Campaign has not accounted for the \$150.00 difference from an unknown contributor(s). *See* Finding #1 d); *see* also Finding #17 e). The Campaign was previously notified of this finding in a notice dated August 8, 2013, sent following the Campaign's Compliance Visit. As these transactions were not cited in the Notice of Alleged Violations and Recommended Penalties, they are not subject to penalty.
- (9) In July 2013, Campaign staff notified CFB staff that the following contributions were misdeposited into the 2009 committee bank account but that they were intended for the 2013 committee. However, the Campaign failed to report and document the underlying contributions. *See* also Finding #17 i). The Campaign was previously notified of this finding in a notice dated August 8, 2013, sent following the Campaign's Compliance Visit. As these transactions were not cited in the Notice of Alleged Violations and Recommended Penalties, they are not subject to penalty.

Exhibit Ia
New Yorkers for de Blasio
Unreported Contributions Appearing on Intermediary Statements
(see Finding #1b)

Intermediary Statement

Intermediaries are individuals or entities who either deliver contributions to a campaign or successfully solicit contributions on behalf of a campaign, where such solicitation is known to the campaign. Postal, delivery or messenger services, fundraising agents, and immediate family members of the contributor are not considered intermediaries.

Committee Name: NEW YORKERS FOR DE BLASIO

Intermediary's Name: JOHN N. JANNINO LIEBER

Home Address: 180 MARLBOROUGH RD

City/State/Zip: BROOKLYN, NEW YORK 11226

Employer: SILVERSTEIN PROPERTIES

Occupation: RE EXECUTIVE

Business Address: 7 WORLD TRADE CENTER

City/State/Zip: NEW YORK, NY 10007

	Contributor's Name	Amount Contributed
1.	MICHAEL LEVY	\$2,000
2.	JEREMY MOSS	\$600
3.	ROBBIN ORBISON	\$240
4.	ROGER SILVERSTEIN	\$600
5.	RICHARD WILLIAMSON	\$240
6.		
7.		
8.		
9.		
10.		

Attach additional pages if the intermediary has more than ten (10) intermediated contributions.

The making of false statements in this document is punishable as a Class E felony pursuant to Section 1875.35 of the Penal Law and/or a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

I hereby affirm that I did not, nor to my knowledge, did anyone else, reimburse any contributor in any manner for contributions was made by the contributor as a loan.

[Redacted Signature]

9/19/12
Date

Signature on original

NYDB02347

Committee Use Only

Transaction ID: _____

INTERMEDIARY STATEMENT

Intermediaries are individuals or entities who either deliver contributions to a campaign or solicit contributions to a campaign, where such solicitation is known to the campaign. Postal, delivery or messenger services, fundraising agents, and immediate family members of the contributor are not considered intermediaries.

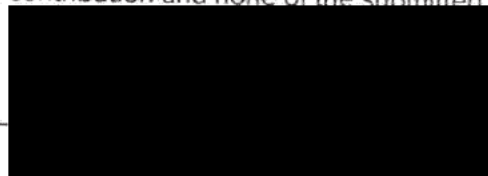
Committee Name: NEW YORKERS FOR DE BLASIO
 Intermediary's Name: CHARLES S. HOCKING
 Home Address: 3 MONTEREY COURT
 City/State/Zip: HOLMDEL, NJ 07733
 Employer: HAZEN AND SAWYER
 Occupation: PRESIDENT/ENGINEER
 Business Address: 498 SEVENTH AVENUE
 City/State/Zip: NEW YORK, NY 10018

	Contributor's Name	Amount Contributed
1.	<u>CHARLES HOCKING</u>	<u>\$400</u>
2.	<u>SANDEEP MEHROTRA</u>	<u>\$400</u>
3.	<u>PATRICIA CANBY</u>	<u>\$400</u>
4.	<u>NATALIE COOKE</u>	<u>\$400</u>
5.	<u>ROBERT TAYLOR</u>	<u>\$400</u>
6.	<u>LISA DAVIS</u>	<u>\$400</u>
7.	<u>DAMIAN ANDERSON</u>	<u>\$400</u>
8.	<u>ANTHONY GREENAL</u>	<u>\$400</u>
9.	<u>JIM STUVE</u>	<u>\$400</u>
10.	<u>BRYANT ROGERS</u>	<u>\$400</u>

Attach additional pages if the intermediary has more than ten (10) intermediated contributions.

The making of false statements in this document is punishable as a Class E felony pursuant to Section 175.35 of the Penal Law and/or a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

I hereby affirm that I did not, nor to my knowledge, did anyone else, reimburse any contributor in any manner for his or her contribution and none of the submitted contributions was made by the contributor as a loan.



9/17/13

Date

Signature on original

8/7/12

NYDB02313

Exhibit II
New Yorkers for de Blasio
Misreported Transactions
(see Finding #1c)

Transaction ID	Payee	Account	Check No./ Transaction	Date	Amount	Correct Amount	Difference	Notes
R0009448	Canfield, Ellyn	6460	9803606969	11/29/11	\$5.00			
R0009450	Murphy, Mark	6460	9803606968	11/29/11	\$100.00			
R0009452	Hof, Susanna	6460	9803606966	11/29/11	\$50.00			
Subtotal					\$155.00	\$2,055.00	\$1,900.00	(1)
R0011794	Brunckhorst, Frank	6460	9803608531	06/22/12	\$50.00			
R0011795	Correction Officers Benevolent	6460	9803608532	06/22/12	\$175.00			
R0011797	Douek, Vivian	6460	9803608533	06/22/12	\$4,950.00			
R0011799	Local 1109 CWA	6460	9803608535	06/22/12	\$1,550.00			
R0011801	Uniformed Sanitationmen's Assn	6460	9803608537	06/22/12	\$2,050.00			
R0011802	Neil, David	6460	980360853	06/22/12	\$2,500.00			
R0011803	Nislick, Stephen	6460	9803608539	06/22/12	\$550.00			
R0011806	Argento Ciafone, Gina	6460	9803608541	06/22/12	\$4,000.00			
R0011807	Strauel, Theodore	6460	9803608543	06/22/12	\$4,450.00			
R0042844	Argento Ciafone, Gina	6460	9803608541	06/22/12	\$1,500.00			
Subtotal					\$21,775.00	\$23,925.00	\$2,150.00	(2), (3)
R0015986	Flemming, William	6460	9803610207	02/11/13	\$100.00			
R0015987	Gross, Marc	6460	9803610205	02/11/13	\$2,100.00			
R0015988	King Jr., Robert E	6460	9803610204	02/11/13	\$500.00			
R0015989	McKissack, Cheryl	6460	9803610203	02/11/13	\$100.00			
R0015990	Malik, Shashi	6460	9803610202	02/11/13	\$2,100.00			
R0015991	Yang, Catherine	6460	9803610201	02/11/13	\$350.00			
R0015992	Schoenblum, Hyman	6460	9803610200	02/11/13	\$1,000.00			
R0015993	Mani, Singh	6460	9803610199	02/11/13	\$600.00			
R0015994	Weiler, Susan	6460	9803610198	01/11/13	\$100.00			
R0015995	Carter Pate, Robert	6460	9803610197	02/11/13	\$600.00			
Subtotal					\$7,550.00	\$7,750.00	\$200.00	(4)

Exhibit II
New Yorkers for de Blasio
Misreported Transactions
(see Finding #1c)

Transaction ID	Payee	Account	Check No./ Transaction	Date	Amount	Correct Amount	Difference	Notes
R0015996	Lapes, Alan		9803610276	02/20/13	\$4,950.00			
R0015997	Feldman, Eli	6460	9803610277	02/20/13	\$1,000.00			
R0015998	Feldman, Eli	6460	9803610277	02/20/13	\$100.00			
R0015999	Laboz, Joseph Jody	6460	9803610278	02/20/13	\$1,600.00			
R0016001	Weiss, Peter	6460	9803610281	02/20/13	\$600.00			
R0016002	Anand, Ami	6460	9803610282	02/20/13	\$175.00			
Subtotal					\$8,425.00	\$13,575.00	\$5,150.00	(5)
R0016170	Stationary Eng Education Fund	6460	9803610445	03/11/13	\$950.00			
R0016171	Stationary Eng Education Fund	6460	9803610445	03/11/13	\$1,000.00			
R0016173	NYC Stagehands NYS PAC	6460	9803610446	03/11/13	\$2,450.00			
R0018515	Rifkin, Susan	6460	9803610447	03/11/13	\$400.00			
Subtotal					\$4,800.00	\$5,300.00	\$500.00	(6)
Total					\$42,705.00	\$52,605.00	\$9,900.00	

Notes:

- (1) The Campaign's bank statement shows a \$2,055.00 withdrawal on November 29, 2011. The full amount of the withdrawal has not been accounted for in the Campaign's reporting.
- (2) The Campaign's bank statement shows a \$23,925.00 withdrawal on June 22, 2012. The full amount of the withdrawal has not been accounted for in the Campaign's reporting.
- (3) The Campaign provided documentation for a contribution refund to New York State Laborers for \$50.00 on June 22, 2012 that it stated was mistakenly withdrawn and then redeposited. The refund was not reported and it could account for some of the difference cited here. *See* Exhibit IIa.
- (4) The Campaign's bank statement shows a \$7,550.00 withdrawal on February 11, 2013. The full amount of the withdrawal has not been accounted for in the Campaign's reporting.
- (5) The Campaign's bank statement shows a \$13,575.00 withdrawal on February 20, 2013. The full amount of the withdrawal has not been accounted for in the Campaign's reporting.
- (6) The Campaign's bank statement shows a \$5,300.00 withdrawal on March 5, 2013. The full amount of the withdrawal has not been accounted for in the Campaign's reporting.

Exhibit IIa
New Yorkers for de Blasio
Unreported Contribution Refund – New York State Laborers
(see Finding #1c)

3/18/2014



STMT 5
Refund: 10743

Keep this receipt as a record of your purchase.

FOR YOUR PROTECTION SAVE THIS COPY
CASHIER'S CHECK

Customer Copy

New York

06/22/2012

Remitter NEW YORKERS FOR DEBLASIO

Pay To The Order Of NEW YORK STATE LABORERS

\$ *****50.00 ***

Drawer: JPMORGAN CHASE BANK, N.A.

NON NEGOTIABLE

TERMS

KEEP THIS COPY FOR YOUR RECORD OF THE TRANSACTION.
PLEASE CONTACT CHASE TO REPORT A LOSS OR FOR ANY OTHER INFORMATION ABOUT THIS ITEM.

Mistakenly Withdrawn From Campaign account
& redeposited 7/3/12

NYDB02015

Exhibit III
New Yorkers for de Blasio
Duplicate Transactions
(see Finding #1d)

Debits

Transaction ID	Payee	Account	Check No.\ Transaction	Date	Amount	Duplicate Amount	Notes
R0017412	Merchant Bank	6460	Debit	01/16/13		\$2,850.00	(1)
R0018228	NY State Insurance Fund	6460	Debit	04/03/13	\$1,236.50		
R0020036	NY State Insurance Fund	6460	Debit	04/05/13		\$1,236.50	
Total						\$4,086.50	

Credits

Transaction ID	Name	Account	Transaction	Date	Amount	Duplicate Amount	
R0005567	Carswell, Lois	6460	Contribution	11/08/10	\$50.00		
R0005544	Dunn, Rhoda	6460	Contribution	11/09/10	\$50.00		
R0005550	Reed, Madonna	6460	Contribution	11/09/10	\$250.00		
R0005554	Saperia, Phillip	6460	Contribution	11/09/10	\$250.00		
R0005557	Celli, Andrew	6460	Contribution	11/09/10	\$500.00		
R0005558	Rosenthal, Donald	6460	Contribution	11/09/10	\$250.00		
R0005561	Fischer, Dawn	6460	Contribution	11/09/10	\$250.00		
R0005563	Sah, Pamela	6460	Contribution	10/31/10	\$100.00		
R0005565	Pearson, Neil	6460	Contribution	11/01/10	\$250.00		
R0005577	Brown, Linda	6460	Contribution	11/09/10	\$100.00		
R0005581	Schachter, Daniel	6460	Contribution	11/09/10	\$1,000.00		
R0005583	Wharton, Karen	6460	Contribution	11/09/10	\$250.00		
R0005553	Brooks, Kermitt	6460	Contribution	11/09/10	\$250.00		
Subtotal					\$3,550.00		
R0008556	Friends of Bill de Blasio-2009	6460	Other Receipt	01/09/11	\$10,005.00	\$3,550.00	(2)
Total						\$3,550.00	

Exhibit III
New Yorkers for de Blasio
Duplicate Transactions
(see Finding #1d)

Notes:

- (1) This transaction appeared on the Campaign's merchant account statement as a negative, "funded amount," on January 15, 2013. It was a charge due to refunds exceeding credit card contributions processed that day. Based on the Campaign's reporting and documentation, CFB staff verified that the credit card refunds for that month were all reported or were identified on the unreported exhibit (see Exhibit I). Therefore, this expenditure duplicates contribution refund(s) reported by the Campaign. However, it cannot be determined which specific transactions are involved because of how refunds are grouped on the merchant account statements.
- (2) In response to the Draft Audit Report, the Campaign amended this transaction from \$5,513.83 to \$10,005.00 to reflect the full amount of the check received by the Campaign from Friends of Bill de Blasio-2009. However, the Campaign has stated that this receipt includes \$3,700.00 in misdeposited contributions that were erroneously deposited into the Friends of Bill de Blasio-2009 account, when they were actually intended for New Yorkers for de Blasio and therefore should have been reported as itemized contribution. The Campaign did report \$3,555.00 of the \$3,700.00 in misdeposited contributions. Therefore, \$3,555.00 of the \$10,005.00 reported as an "Other Receipt" is duplicative. *See* Finding #1 b); *see* also Finding #17 e).

Exhibit IV
New Yorkers for De Blasio
Daily Pre-Election Disclosure - Contributions
(see Finding #2a)

Reported Contributor	Statement/ Schedule/ Transaction ID	Date Received	Amount	Notes
Dewart Bell, Janet	12/ABC/R0027124	08/27/13	\$500.00	(1)
Melchionni, Drew	12/ABC/R0028842	09/01/13	\$2,450.00	
McKissack, Deryl	12/ABC/R0028928	09/03/13	\$2,350.00	
Bonomo, Anthony	12/ABC/R0029510	09/03/13	\$2,475.00	(2)
Bonomo, William	12/ABC/R0029511	09/03/13	\$2,475.00	(2)
Bonomo, Carl	12/ABC/R0029526	09/03/13	\$2,475.00	(2)
Thamkittikasem, Chanut	16/ABC/R0042931	09/03/13	\$1,495.00	(3)
Enright, Janice	12/ABC/R0028825	09/04/13	\$1,000.00	
Pulitano, Gregory	12/ABC/R0028835	09/04/13	\$2,350.00	
Bell, Janet	12/ABC/R0028370	09/05/13	\$1,000.00	(1)
Davis, Peggy	13/ABC/R0031817	09/05/13	\$250.00	
Enright, Janice	12/ABC/R0028367	09/06/13	\$1,000.00	
Partridge Brown, Mary	12/ABC/R0028704	09/06/13	\$2,500.00	(4)
Theatrical Teamsters Local 817	12/ABC/R0028827	09/06/13	\$2,475.00	
Wood, David	12/ABC/R0028832	09/06/13	\$2,450.00	
Daniel, Samuel	12/ABC/R0028919	09/06/13	\$2,350.00	
Dildabanian, Jack	12/ABC/R0028975	09/06/13	\$2,450.00	
Tichner, Barbara E	12/ABC/R0028979	09/06/13	\$2,450.00	
Ponte, Vincent F	12/ABC/R0028991	09/06/13	\$2,450.00	
Thamkittikasem, Chanut	12/ABC/R0028598	09/08/13	\$1,000.00	(3)
1199/SEIU NYS Pol. Action Fund	12/D/R0028634	09/08/13	\$19,084.25	
Smith, Keisha	12/ABC/R0029020	09/08/13	\$2,000.00	
1199/SEIU NYS Pol. Action Fund	16/D/R0042524	09/08/13	\$168.31	
1199/SEIU NYS Pol. Action Fund	16/D/R0042526	09/08/13	\$60.00	
Travaglia, Bruno	12/ABC/R0028797	09/09/13	\$1,500.00	
Hildreth, Peter J	12/ABC/R0028799	09/09/13	\$1,500.00	
Goodson, John	12/ABC/R0028802	09/09/13	\$2,000.00	

Exhibit IV
New Yorkers for De Blasio
Daily Pre-Election Disclosure - Contributions
(see Finding #2a)

Reported Contributor	Statement/ Schedule/ Transaction ID	Date Received	Amount	Notes
Keil, Matt	12/ABC/R0028806	09/09/13	\$2,000.00	
Kessler, David	12/ABC/R0028808	09/09/13	\$2,475.00	
Topaz, Marc	12/ABC/R0028809	09/09/13	\$2,475.00	
Barroway, Andrew	12/ABC/R0028810	09/09/13	\$2,475.00	
Lynch, Patrick	12/ABC/R0028812	09/09/13	\$2,475.00	
Williams, Dawanna L	12/ABC/R0028964	09/09/13	\$2,000.00	
Sackler, Elizabeth A	16/ABC/R0042933	09/09/13	\$2,475.00	(3)
Osborn, John E	15/ABC/R0037904	10/22/13	\$1,000.00	(5)
Miller, Reggie	15/ABC/R0038828	10/22/13	\$350.00	
Galletto, Gianluca	15/ABC/R0038880	10/22/13	\$175.00	
Osborn, John E	15/ABC/R0041025	10/23/13	\$250.00	(5)
Tempo 802	15/D/R0039823	10/24/13	\$2,448.09	
Panepinto, Joseph A	15/ABC/R0040175	10/24/13	\$1,000.00	
Decaro, Thomas N	15/ABC/R0039027	10/27/13	\$400.00	(3)
Decaro, Thomas	15/ABC/R0039169	10/27/13	\$750.00	
Carr, Christopher D	16/ABC/R0042069	10/30/13	\$1,225.00	(3)
Singh, Gurcharan	15/ABC/R0040265	10/31/13	\$2,500.00	(6)
Melinda Katz 2013	15/ABC/R0040274	10/31/13	\$3,850.00	(6)
OPEIU JBMoss Voice of Electora	15/ABC/R0040277	10/31/13	\$4,950.00	(6)
Lappin 2009	15/ABC/R0040299	10/31/13	\$2,000.00	(6)
Unite Here Local 19	15/ABC/R0040559	10/31/13	\$2,500.00	(6)
Blavatnik, Emily	15/ABC/R0040586	10/31/13	\$4,950.00	(6)
Fluet, Robert	15/ABC/R0040619	10/31/13	\$4,950.00	(6)
Queenan, Thomas J	15/ABC/R0040623	10/31/13	\$2,500.00	(6)
Jones, Norman	15/ABC/R0041262	11/04/13	\$4,950.00	
Mintz, Kenneth	15/ABC/R0041080	11/05/13	\$1,000.00	(7)
Sonnenfeldt, Neil D	15/ABC/R0041085	11/05/13	\$1,000.00	(7)

Exhibit IV
New Yorkers for De Blasio
Daily Pre-Election Disclosure - Contributions
(see Finding #2a)

Reported Contributor	Statement/ Schedule/ Transaction ID	Date Received	Amount	Notes
Nemetsky, Howard	15/ABC/R0041104	11/05/13	\$1,000.00	(7)
Friedman, Gary D	15/ABC/R0041118	11/05/13	\$1,000.00	(7)
Total			<u>\$125,380.65</u>	

Notes:

- (1) Based on the reported name and address, this is the same person.
- (2) The disclosure was filed 5 days late.
- (3) This contribution was reported and/or modified after the Campaign received its Draft Audit Report dated December 8, 2014.
- (4) The disclosure was filed 3 days late.
- (5) The Campaign received more than \$1,000.00 in contributions from this individual during the two week period.
- (6) The disclosure was filed 2 days late.
- (7) In its Draft Audit Report response, the Campaign stated that this contribution was received at an event held on 10/17/13, during the pre-election disclosure period. Therefore, the Campaign reported an inaccurate received date and failed to report the contribution until after the pre-election disclosure period. *See* Exhibit IVa.

Exhibit IVa

New Yorkers for de Blasio

Daily Pre-Election Disclosure – Narrative Provided in Draft Audit Report Response

(see Finding #2a)

11/12/2014 20:14

New York City Campaign Finance Board
Campaign Finance Information System
Suspected Intermediaries by Employer Name and Date Received

Employer Name: Gutman & Mintz
Date Received: 11/05/2013

Election: 2013
Candidate: de Blasio, Bill (ID:326-P)
Office: 1 (Mayor)

Contributor Name	Employer Address	Date Received	Intermediary Number	Stmt/Sch/Ref	Amount	Provide Your Response Here
<u>Employer Name: Gutman & Mintz</u> Mintz, Kenneth	813 Jericho Tpke	11/05/2013		15/ABC/R0041080	\$1,000.00	
<u>Employer Name: Gutman Mintz</u> Friedman, Gary D	813 Jericho Turnpike	11/05/2013		15/ABC/R0041118	\$1,000.00	
Polirer, Russell	813 Jericho Turnpike	11/05/2013		15/ABC/R0041123	\$500.00	
Sonnenfeldt, Neil D	813 Jericho Turnpike	11/05/2013		15/ABC/R0041085	\$1,000.00	
<u>Employer Name: Gutman Mintz Bakers & Sonnenf</u> Friedman, Donna Denton	813 Jericho Turnpike	11/05/2013		15/ABC/R0041077	\$500.00	
<u>Employer Name: Gutman Muntz</u> Nemetsky, Howard	813 Jericho Turnpike	11/05/2013		15/ABC/R0041104	\$1,000.00	
				Total:	\$5,000.00	

Contributions raised at 10/17 event and accepted by Campaign after vetting

Exhibit V
New Yorkers for de Blasio
Daily Pre-Election Disclosure - Expenditures
(see Finding #2b)

Name	Statement/ Schedule/ Transaction ID	Incurred/ Received/ Paid Date	Amount	Notes
Stanley Kalmon Schlein Esq.	12/F/R0029517	09/01/13	\$35,000.00	
Precision Network	12/F/R0029554	09/07/13	\$25,000.00	
AMS Communications	15/F/R0040662	10/31/13	\$45,300.00	(1)

Notes:

(1) The Campaign filed the disclosure 2 days late.

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
Adler, Mary	1/ABC/R0005244	Monetary Contribution	05/27/10	\$4,950.00		
Adler, Mary	3/ABC/R0007251	Monetary Contribution	06/20/11	\$2,500.00		
Adler, Mary	16/M/R0008681	Contribution Refund	12/16/11	(\$2,500.00)		Timely
Adler, Mary	5/ABC/R0013286	Monetary Contribution	07/11/12	\$1,000.00		
Adler, Mary	16/M/R0014850	Contribution Refund	01/10/13	(\$1,000.00)		
Adler, Mary	7/ABC/R0017304	Monetary Contribution	03/11/13	\$2,275.00		
Adler, Mary	16/M/R0018517	Contribution Refund	05/07/13	(\$2,275.00)		
				Total		
				Office Limit		
				Amount Over the Limit	<u>\$0.00</u>	
Ferrara, Lucas A	1/ABC/R0005359	Monetary Contribution	07/09/10	\$1,000.00		
Ferrara, Lucas A	3/ABC/R0007043	Monetary Contribution	06/14/11	\$1,000.00		
Ferrara, Lucas A	3/ABC/R0007262	Monetary Contribution	06/21/11	\$1,500.00		
Ferrara, Lucas A	3/ABC/R0007940	Monetary Contribution	07/11/11	\$2,500.00		
Ferrara, Lucas A	16/M/R0008684	Contribution Refund	12/16/11	(\$1,050.00)		Timely
Ferrara, Lucas A	14/ABC/R0037872	Monetary Contribution	10/18/13	\$4,950.00		
Ferrara, Lucas A	16/M/R0038245	Contribution Refund	10/24/13	(\$4,950.00)		
				Total		
				Office Limit		
				Amount Over the Limit	<u>\$0.00</u>	

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
IUOE Local Union 15	3/ABC/R0006587	Monetary Contribution	06/10/11	\$2,500.00		
IUOE Local 15, A, B, C, D	3/ABC/R0007618	Monetary Contribution	06/23/11	\$2,500.00		
IUOE Local 15, A, B, C, D	16/M/R0008685	Contribution Refund	12/16/11	(\$50.00)		
IUOE Local 15, A, B, C, D	6/ABC/R0015475	Monetary Contribution	01/07/13	\$1,000.00		
IUOE Local 15, A, B, C, D	6/ABC/R0015958	Monetary Contribution	01/09/13	\$1,450.00		
IUOE Local 15, A, B, C, D	16/M/R0016141	Contribution Refund	03/05/13	(\$2,450.00)		Timely
IUOE Local 15, A, B, C, D	14/ABC/R0037060	Monetary Contribution	10/21/13	\$2,450.00		
IUOE Local 15, A, B, C, D	16/M/R0039618	Contribution Refund	10/29/13	(\$2,450.00)		
			Total	\$4,950.00		
			Office Limit	<u>\$4,950.00</u>		
			Amount Over the Limit	<u>\$0.00</u>		
Uniformed Sanitationmen's Assn	1/ABC/R0005188	Monetary Contribution	05/19/10	\$2,500.00		
Uniformed Sanitationmen's Assn	2/ABC/R0005403	Monetary Contribution	07/28/10	\$1,000.00		
Uniformed Sanitationmen's Assn	3/ABC/R0007531	Monetary Contribution	06/16/11	\$2,500.00		
Uniformed Sanitationmen's Assn	4/ABC/R0009069	Monetary Contribution	12/07/11	\$1,000.00		
Uniformed Sanitationmen's Assn	16/M/R0008683	Contribution Refund	12/16/11	(\$1,050.00)		Timely
Uniformed Sanitationmen's Assn	16/M/R0011801	Contribution Refund	06/22/12	(\$2,050.00)		
			Total	\$3,900.00		
			Office Limit	<u>\$4,950.00</u>		
			Amount Over the Limit	<u>(\$1,050.00)</u>		

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
Sheehan, Elizabeth M	1/ABC/R0005229	Monetary Contribution	04/22/10	\$2,500.00		
Sheehan, Elizabeth M	3/ABC/R0007283	Monetary Contribution	06/22/11	\$4,950.00		
Sheehan, Elizabeth M	16/M/R0008682	Contribution Refund	12/16/11	(\$2,500.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		
Argento Ciafone, Gina	1/ABC/R0005182	Monetary Contribution	05/23/10	\$3,000.00		
Argento Ciafone, Gina	4/ABC/R0008668	Monetary Contribution	12/13/10	\$4,000.00		
Argento Ciafone, Gina	2/ABC/R0005683	Monetary Contribution	12/15/10	\$1,950.00		
Argento Ciafone, Gina	3/ABC/R0006897	Monetary Contribution	06/23/11	\$4,950.00		
Argento Ciafone, Gina	4/ABC/R0008936	Monetary Contribution	11/14/11	\$1,500.00		
Argento Ciafone, Gina	16/M/R0008676	Contribution Refund	12/16/11	(\$4,950.00)		Timely
Argento Ciafone, Gina	16/M/R0011806	Contribution Refund	06/22/12	(\$4,000.00)		
Argento Ciafone, Gina	16/M/R0042844	Contribution Refund	06/22/12	(\$1,500.00)		
Argento Ciafone, Gina	16/M/R0013550	Contribution Refund	07/30/12	(\$1,500.00)		
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>(\$1,500.00)</u>		
Fialkoff, Frank	3/ABC/R0008156	Monetary Contribution	07/11/11	\$1,000.00		
Fialkoff, Frank	7/ABC/R0016169	Monetary Contribution	07/11/11	\$4,950.00		
Fialkoff, Frank	16/M/R0018518	Contribution Refund	05/07/13	(\$1,000.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
Chera, Stanley	5/ABC/R0016101	Monetary Contribution	07/10/12	\$2,950.00		
Chera, Stanley	6/ABC/R0014545	Monetary Contribution	11/19/12	\$4,950.00		
Chera, Stanley	16/M/R0016138	Contribution Refund	03/05/13	(\$2,950.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				\$4,950.00		
				<u>\$4,950.00</u>		
				<u>\$0.00</u>		
Strauel, Theodore A	2/ABC/R0005798	Monetary Contribution	12/08/10	\$1,000.00		
Strauel, Theodore	3/ABC/R0006307	Monetary Contribution	02/28/11	\$1,000.00		
Strauel, Theodore	4/ABC/R0009076	Monetary Contribution	12/05/11	\$4,950.00		
Strauel, Theodore A	4/ABC/R0009077	Monetary Contribution	12/05/11	\$2,450.00		
Strauel, Theodore	16/M/R0011807	Contribution Refund	06/22/12	(\$4,450.00)		Timely
Strauel, Theodore A	5/ABC/R0013206	Monetary Contribution	07/11/12	\$1,500.00		
Strauel, Theodore	16/M/R0014845	Contribution Refund	12/20/12	(\$500.00)		
Strauel, Theodore	16/M/R0014846	Contribution Refund	12/20/12	(\$1,000.00)		
Strauel, Theodore	14/ABC/R0031278	Monetary Contribution	10/01/13	\$4,950.00		
Strauel, Theodore	16/M/R0039634	Contribution Refund	10/29/13	(\$4,950.00)		
				Total		
				Office Limit		
				Amount Over the Limit		
				\$4,950.00		
				<u>\$4,950.00</u>		
				<u>\$0.00</u>		

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
Local 1109 CWA	1/ABC/R0005210	Monetary Contribution	05/19/10	\$500.00		
Local 1109 CWA	3/ABC/R0006322	Monetary Contribution	02/10/11	\$2,500.00		
Local 1109 CWA	4/ABC/R0008204	Monetary Contribution	07/26/11	\$1,000.00		
Local 1109 CWA	4/ABC/R0009619	Monetary Contribution	01/05/12	\$2,500.00		
Local 1109 CWA	16/M/R0011799	Contribution Refund	06/22/12	(\$1,550.00)		Timely
			Total	\$4,950.00		
			Office Limit	<u>\$4,950.00</u>		
			Amount Over the Limit	<u>\$0.00</u>		
Nislick, Stephen	1/ABC/R0005246	Monetary Contribution	05/21/10	\$1,000.00		
Nislick, Stephen	2/ABC/R0005602	Monetary Contribution	12/06/10	\$1,000.00		
Nislick, Stephen	2/ABC/R0005908	Monetary Contribution	01/11/11	\$2,500.00		
Nislick, Stephen	4/ABC/R0009516	Monetary Contribution	12/05/11	\$1,000.00		
Nislick, Stephen	16/M/R0011803	Contribution Refund	06/22/12	(\$550.00)		Timely
			Total	\$4,950.00		
			Office Limit	<u>\$4,950.00</u>		
			Amount Over the Limit	<u>\$0.00</u>		
Gutman, Henry	1/ABC/R0005279	Monetary Contribution	06/28/10	\$1,000.00		
Gutman, Henry	2/ABC/R0005894	Monetary Contribution	01/11/11	\$2,500.00		
Gutman, Henry	3/ABC/R0007764	Monetary Contribution	07/11/11	\$2,500.00		
Gutman, Henry	16/M/R0008679	Contribution Refund	12/16/11	(\$1,050.00)		Timely
			Total	\$4,950.00		
			Office Limit	<u>\$4,950.00</u>		
			Amount Over the Limit	<u>\$0.00</u>		

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
Agger, Marc	2/ABC/R0005855	Monetary Contribution	12/22/10	\$500.00		
Agger, Marc	3/ABC/R0007637	Monetary Contribution	07/06/11	\$4,000.00		
Agger, Marc	16/M/R0015232	Contribution Refund	01/11/13	(\$50.00)		
Agger, Marc	6/ABC/R0015231	Monetary Contribution	01/11/13	\$500.00		
Agger, Marc	6/ABC/R0015619	Monetary Contribution	01/11/13	\$50.00		
Agger, Marc	16/M/R0018519	Contribution Refund	05/07/13	(\$50.00)		Untimely
				Total		
				Office Limit	<u>\$4,950.00</u>	
				Amount Over the Limit	<u>\$0.00</u>	
<hr/>						
Douek, Vivian	2/ABC/R0005589	Monetary Contribution	11/30/10	\$4,950.00		
Douek, Vivian	3/ABC/R0007044	Monetary Contribution	06/15/11	\$4,950.00		
Douek, Vivian	16/M/R0011797	Contribution Refund	06/22/12	(\$4,950.00)		Timely
				Total	\$4,950.00	
				Office Limit	<u>\$4,950.00</u>	
				Amount Over the Limit	<u>\$0.00</u>	
<hr/>						
Jacobs, Jay	1/ABC/R0005238	Monetary Contribution	05/27/10	\$2,500.00		
Jacobs, Jay	6/ABC/R0013963	Monetary Contribution	10/23/12	\$4,950.00		
Jacobs, Jay	16/M/R0016140	Contribution Refund	03/05/13	(\$2,500.00)		Timely
				Total	\$4,950.00	
				Office Limit	<u>\$4,950.00</u>	
				Amount Over the Limit	<u>\$0.00</u>	

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
Schiffirin, Richard	6/ABC/R0016103	Monetary Contribution	11/26/12	\$4,950.00		
Schiffirin, Richard	6/ABC/R0016104	Monetary Contribution	01/07/13	\$4,950.00		
Schiffirin, Richard	16/M/R0016142	Contribution Refund	03/05/13	(\$4,950.00)		Timely
			Total	\$4,950.00		
			Office Limit	<u>\$4,950.00</u>		
			Amount Over the Limit	<u>\$0.00</u>		
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CWA Local 1180	2/ABC/R0005939	Monetary Contribution	12/08/10	\$1,000.00		
CWA Local 1180	4/ABC/R0009618	Monetary Contribution	01/03/12	\$1,000.00		
New York Admin Employ CWA1180	7/ABC/R0017144	Monetary Contribution	03/08/13	\$500.00		
New York Admin Employ CWA1180		Monetary Contribution	10/16/13	\$2,950.00		
New York Admin Employ CWA1180	16/M/R0039597	Contribution Refund	10/29/13	(\$500.00)		Timely
			Total	\$4,950.00		
			Office Limit	<u>\$4,950.00</u>		
			Amount Over the Limit	<u>\$0.00</u>		
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Burgos, Geraldine	14/ABC/R0032958	Monetary Contribution	10/09/13	\$4,990.00		
Burgos, Geraldine	16/M/R0039600	Contribution Refund	10/29/13	(\$40.00)		Timely
			Total	\$4,950.00		
			Office Limit	<u>\$4,950.00</u>		
			Amount Over the Limit	<u>\$0.00</u>		

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
O'Dwyer, Brian	1/ABC/R0005226	Monetary Contribution	05/12/10	\$1,000.00		
O'Dwyer, Brian	3/ABC/R0007488	Monetary Contribution	07/06/11	\$2,000.00		
ODwyer, Brian	14/ABC/R0031354	Monetary Contribution	10/02/13	\$4,000.00		
O'Dwyer, Brian	14/ABC/R0035616	Monetary Contribution	10/18/13	\$950.00		
ODwyer, Brian	16/M/R0039604	Contribution Refund	10/29/13	(\$3,000.00)		Timely
				Total		
				Office Limit	<u>\$4,950.00</u>	
				Amount Over the Limit	<u>\$0.00</u>	
Gul, Sher	14/ABC/R0032610	Monetary Contribution	10/04/13	\$5,000.00		
Gul, Sher	16/M/R0039606	Contribution Refund	10/29/13	(\$50.00)		Timely
				Total	\$4,950.00	
				Office Limit	<u>\$4,950.00</u>	
				Amount Over the Limit	<u>\$0.00</u>	
Ginsberg, Seth	13/ABC/R0030717	Monetary Contribution	09/30/13	\$2,500.00		
Ginsberg, Seth	14/ABC/R0032483	Monetary Contribution	10/05/13	\$2,500.00		
Ginsberg, Seth	16/M/R0039609	Contribution Refund	10/29/13	(\$50.00)		Timely
				Total	\$4,950.00	
				Office Limit	<u>\$4,950.00</u>	
				Amount Over the Limit	<u>\$0.00</u>	

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
Govil, Arun	4/ABC/R0009406	Monetary Contribution	12/27/11	\$4,950.00		
Govil, Arun	12/ABC/R0029979	Monetary Contribution	09/16/13	\$1,000.00		
Govil, Arun	16/M/R0039613	Contribution Refund	10/29/13	(\$1,000.00)		Timely
			Total	\$4,950.00		
			Office Limit	<u>\$4,950.00</u>		
			Amount Over the Limit	<u>\$0.00</u>		
<hr/>						
Kaplan, Allen	1/ABC/R0005387	Monetary Contribution	07/09/10	\$1,000.00		
Kaplan, Allen	5/ABC/R0013205	Monetary Contribution	07/11/12	\$3,950.00		
Kaplan, Allen	14/ABC/R0031274	Monetary Contribution	10/01/13	\$3,950.00		
Kaplan, Allen	16/M/R0039615	Contribution Refund	10/29/13	(\$3,950.00)		Timely
			Total	\$4,950.00		
			Office Limit	<u>\$4,950.00</u>		
			Amount Over the Limit	<u>\$0.00</u>		
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Argento, Anthony	3/ABC/R0006899	Monetary Contribution	06/23/11	\$950.00		
Argento, Anthony	4/ABC/R0010381	Monetary Contribution	01/04/12	\$4,000.00		
Argento, Anthony P	14/ABC/R0034253	Monetary Contribution	10/12/13	\$4,000.00		
Argento, Anthony P	16/M/R0039623	Contribution Refund	10/29/13	(\$4,000.00)		Timely
			Total	\$4,950.00		
			Office Limit	<u>\$4,950.00</u>		
			Amount Over the Limit	<u>\$0.00</u>		

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
Sachs, Jeffery	2/ABC/R0005646	Monetary Contribution	12/09/10	\$1,000.00		
Sachs, Jeffery	3/ABC/R0006708	Monetary Contribution	06/20/11	\$1,000.00		
Sachs, Jeffery	4/ABC/R0009930	Monetary Contribution	01/10/12	\$2,000.00		
Sachs, Jeffery	5/ABC/R0012613	Monetary Contribution	05/15/12	\$1,000.00		
Sachs, Jeffery	16/M/R0013552	Contribution Refund	07/30/12	(\$50.00)		
Sachs, Jeffery	14/ABC/R0033979	Monetary Contribution	10/11/13	\$4,950.00		
Sachs, Jeffery	16/M/R0039629	Contribution Refund	10/29/13	(\$4,950.00)		Timely
Total				\$4,950.00		
Office Limit				\$4,950.00		
Amount Over the Limit				<u>\$0.00</u>		
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Schwartz, Joseph	7/ABC/R0016183	Monetary Contribution	01/14/13	\$1,000.00		
Schwartz, Joseph	14/ABC/R0034789	Monetary Contribution	10/14/13	\$4,950.00		
Schwartz, Joseph	16/M/R0039631	Contribution Refund	10/29/13	(\$1,000.00)		Timely
Total				\$4,950.00		
Office Limit				\$4,950.00		
Amount Over the Limit				<u>\$0.00</u>		
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Weingarten, Allen	6/ABC/R0015508	Monetary Contribution	01/08/13	\$4,950.00		
Weingarten, Allen	14/ABC/R0033379	Monetary Contribution	10/07/13	\$4,950.00		
Weingarten, Allen	16/M/R0039635	Contribution Refund	10/29/13	(\$4,950.00)		Timely
Total				\$4,950.00		
Office Limit				\$4,950.00		
Amount Over the Limit				<u>\$0.00</u>		

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
Ashkin, Roberta	8/ABC/R0017918	Monetary Contribution	04/10/13	\$175.00		
Ashkin, Roberta	15/ABC/R0038358	Monetary Contribution	10/24/13	\$4,950.00		
Ashkin, Roberta	16/M/R0039644	Contribution Refund	10/29/13	(<u>\$175.00</u>)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		
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McKissack, Deryl	12/ABC/R0028928	Monetary Contribution	09/03/13	\$2,350.00		
McKissack, Deryl	15/ABC/R0038315	Monetary Contribution	10/24/13	\$2,650.00		
McKissack, Deryl	16/M/R0039654	Contribution Refund	10/29/13	(<u>\$50.00</u>)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		
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Webb, Arthur	4/ABC/R0010205	Monetary Contribution	01/10/12	\$1,000.00		
Webb, Arthur	4/ABC/R0010469	Monetary Contribution	01/11/12	\$1,000.00		
Webb, Arthur Y	14/ABC/R0033314	Monetary Contribution	10/09/13	\$4,950.00		
Webb, Arthur	BOE	Contribution Refund	02/11/15	(<u>\$2,000.00</u>)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
Hershman, Lloyd	2/ABC/R0005891	Monetary Contribution	01/11/11	\$1,000.00		
Hershman, Lloyd	4/ABC/R0010001	Monetary Contribution	01/08/12	\$2,100.00		
Hershman, Lloyd	4/ABC/R0010405	Monetary Contribution	01/11/12	\$1,850.00		
Hershman, Lloyd	5/ABC/R0011380	Monetary Contribution	05/07/12	\$1,800.00		
Hershman, Lloyd	BOE	Contribution Refund	02/11/15	(\$1,800.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		
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HF Responsibility Fund	3/ABC/R0006677	Monetary Contribution	06/01/11	\$250.00		
HR Responsibility Fund	7/ABC/R0016539	Monetary Contribution	02/14/13	\$400.00		
HF Responsibility Fund	14/ABC/R0032368	Monetary Contribution	10/01/13	\$4,550.00		
HF Responsibility Fund	BOE	Contribution Refund	02/11/15	(\$250.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		
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NYC DC of Carpenters	3/ABC/R0006289	Monetary Contribution	03/10/11	\$1,000.00		
United Brotherhood of Carpenters	15/ABC/R0040703	Monetary Contribution	11/04/13	\$4,950.00		
United Brotherhood of Carpenters	BOE	Contribution Refund	02/11/15	(\$1,000.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
Sieger, Abraham	3/ABC/R0006869	Monetary Contribution	06/29/11	\$2,500.00		
Sieger, Abraham	4/ABC/R0009538	Monetary Contribution	01/03/12	\$3,300.00		
Sieger, Abraham	5/ABC/R0012179	Monetary Contribution	06/13/12	\$175.00		
Sieger, Abraham	Unreported	Contribution Refund	12/20/12	(\$1,200.00)		Untimely
Sieger, Abraham	16/M/R0015730	Contribution Refund	01/10/13	(\$1,200.00)		
Sieger, Abraham	8/ABC/R0018929	Monetary Contribution	04/22/13	\$2,000.00		
Sieger, Abraham	8/ABC/R0019709	Monetary Contribution	04/25/13	\$2,000.00		
Sieger, Abraham	BOE	Contribution Refund	02/11/15	(\$3,825.00)		
			Total	\$3,750.00		
			Office Limit	<u>\$4,950.00</u>		
			Amount Over the Limit	<u>(\$1,200.00)</u>		
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Williams, Dawanna L	12/ABC/R0028964	Monetary Contribution	09/09/13	\$2,000.00		
Williams, Dawanna L	15/ABC/R0038424	Monetary Contribution	10/24/13	\$3,000.00		
Williams, Dawanna L	16/M/R0039660	Contribution Refund	10/29/13	(\$50.00)		Timely
			Total	\$4,950.00		
			Office Limit	<u>\$4,950.00</u>		
			Amount Over the Limit	<u>\$0.00</u>		
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Zuccotti, John	7/ABC/R0016168	Monetary Contribution	02/10/13	\$1,000.00		
Zuccotti, John	13/ABC/R0030736	Monetary Contribution	09/30/13	\$4,950.00		
Zuccotti, John	16/M/R0031794	Contribution Refund	10/07/13	(\$1,000.00)		Timely
			Total	\$4,950.00		
			Office Limit	<u>\$4,950.00</u>		
			Amount Over the Limit	<u>\$0.00</u>		

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
Boonshoft, Gina Maria	7/ABC/R0017267	Monetary Contribution	03/10/13	\$500.00		
Boonshoft, Gina Maria	8/ABC/R0019767	Monetary Contribution	04/30/13	\$525.00		
Boonshoft, Gina Maria	9/ABC/R0021097	Monetary Contribution	05/23/13	\$1,000.00		
Boonshoft, Gina Maria	9/ABC/R0021358	Monetary Contribution	06/25/13	\$2,500.00		
Boonshoft, Gina Maria	12/ABC/R0029770	Monetary Contribution	09/16/13	\$2,000.00		
Boonshoft, Gina Maria	16/M/R0031795	Contribution Refund	10/07/13	(\$1,575.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		
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Ackerman, Richard	4/ABC/R0010285	Monetary Contribution	12/30/11	\$1,000.00		
Ackerman, Richard	6/ABC/R0015284	Monetary Contribution	01/10/13	\$1,000.00		
Ackerman, Richard	13/ABC/R0030320	Monetary Contribution	09/27/13	\$3,500.00		
Ackerman, Richard	16/M/R0031796	Contribution Refund	10/07/13	(\$550.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		
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DiNardo, Joseph	5/ABC/R0011846	Monetary Contribution	06/04/12	\$4,900.00		
DiNardo, Joseph	12/ABC/R0029980	Monetary Contribution	09/16/13	\$250.00		
DiNardo, Joseph	16/M/R0031797	Contribution Refund	10/07/13	(\$200.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
Mezitis, Spyros	9/ABC/R0021152	Monetary Contribution	06/17/13	\$3,000.00		
Mezitis, Spyros	13/ABC/R0031814	Monetary Contribution	09/21/13	\$1,000.00		
Mezitis, Spyros	13/ABC/R0031815	Monetary Contribution	09/26/13	\$1,950.00		
Mezitis, Spyros	16/M/R0031798	Contribution Refund	10/07/13	(\$1,000.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		
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Rubin, Donald	3/ABC/R0007640	Monetary Contribution	07/07/11	\$4,950.00		
Rubin, Donald	13/ABC/R0031213	Monetary Contribution	09/24/13	\$4,950.00		
Rubin, Donald	16/M/R0031799	Contribution Refund	10/07/13	(\$4,950.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		
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Rubin, Shelley	4/ABC/R0010172	Monetary Contribution	01/11/12	\$4,950.00		
Rubin, Shelley	13/ABC/R0029926	Monetary Contribution	09/25/13	\$4,950.00		
Rubin, Shelley	16/M/R0031800	Contribution Refund	10/07/13	(\$4,950.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
Rothschild Cooper, Nan	13/ABC/R0030698	Monetary Contribution	09/30/13	\$4,960.00		
Rothschild Cooper, Nan	16/M/R0031801	Contribution Refund	10/07/13	(\$10.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		
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Ortiz, Felix	12/ABC/R0027360	Monetary Contribution	08/29/13	\$500.00		
Ortiz, Felix	13/ABC/R0030712	Monetary Contribution	09/30/13	\$4,950.00		
Ortiz, Felix	16/M/R0031802	Contribution Refund	10/07/13	(\$500.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		
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Schindler, Ronny	9/ABC/R0021186	Monetary Contribution	06/06/13	\$1,000.00		
Schindler, Ronny	13/ABC/R0029663	Monetary Contribution	09/18/13	\$4,000.00		
Schindler, Ronny	16/M/R0031803	Contribution Refund	10/07/13	(\$500.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
Small, Doreen	6/ABC/R0015111	Monetary Contribution	01/11/13	\$4,950.00		
Small, Doreen	13/ABC/R0030475	Monetary Contribution	09/23/13	\$4,500.00		
Small, Doreen	16/M/R0031804	Contribution Refund	10/07/13	(\$4,500.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit	<u>\$0.00</u>	
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Ben-Haim, Zvi	5/ABC/R0013034	Monetary Contribution	07/10/12	\$1,500.00		
Ben-Haim, Zvi	13/ABC/R0031816	Monetary Contribution	09/20/13	\$4,950.00		
Ben-Haim, Zvi	16/M/R0031805	Contribution Refund	10/07/13	(\$1,500.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit	<u>\$0.00</u>	
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Davis, Peggy	11/ABC/R0025020	Monetary Contribution	08/14/13	\$1,000.00		
Davis, Peggy	11/ABC/R0025485	Monetary Contribution	08/21/13	\$1,000.00		
Davis, Peggy	12/ABC/R0027246	Monetary Contribution	08/28/13	\$1,000.00		
Davis, Peggy	12/ABC/R0028284	Monetary Contribution	09/05/13	\$500.00		
Davis, Peggy	13/ABC/R0031817	Monetary Contribution	09/05/13	\$250.00		
Davis, Peggy	13/ABC/R0031818	Monetary Contribution	09/25/13	\$1,460.00		
Davis, Peggy	16/M/R0031806	Contribution Refund	10/07/13	(\$260.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit	<u>\$0.00</u>	

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
Allen, Yoko	12/ABC/R0029093	Monetary Contribution	09/13/13	\$5,000.00		
Allen, Yoko	16/M/R0029613	Contribution Refund	09/25/13	(\$50.00)		Untimely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		
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Mosey, Acea	6/ABC/R0015032	Monetary Contribution	01/10/13	\$2,500.00		
Mosey, Acea	12/ABC/R0029269	Monetary Contribution	09/15/13	\$2,475.00		
Mosey, Acea	16/M/R0029612	Contribution Refund	09/25/13	(\$25.00)		Untimely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		
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Sheffer, Jonathan	1/ABC/R0005242	Monetary Contribution	05/20/10	\$2,500.00		
Sheffer, Jonathan	3/ABC/R0007881	Monetary Contribution	07/11/11	\$1,000.00		
Sheffer, Jonathan	5/ABC/R0011877	Monetary Contribution	06/13/12	\$1,450.00		
Sheffer, Jonathan	12/ABC/R0028855	Monetary Contribution	09/12/13	\$4,950.00		
Sheffer, Jonathan	16/M/R0029614	Contribution Refund	09/25/13	(\$4,950.00)		Untimely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
Morris, Matthew	6/ABC/R0014371	Monetary Contribution	11/12/12	\$2,000.00		
Morris, Matthew	7/ABC/R0016540	Monetary Contribution	02/08/13	\$2,858.00		
Morris, Matthew	9/ABC/R0021333	Monetary Contribution	06/20/13	\$100.00		
Morris, Matthew	16/M/R0022467	Contribution Refund	07/24/13	(\$8.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		
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Boies, Christopher	4/ABC/R0009032	Monetary Contribution	11/21/11	\$4,950.00		
Boies, Christopher	16/ABC/R0042898	Monetary Contribution	05/06/13	\$4,950.00		
Boies, Christopher	16/M/R0021181	Contribution Refund	06/20/13	(\$4,950.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		
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Tsitiridis, Savas	4/ABC/R0010279	Monetary Contribution	01/03/12	\$1,000.00		
Tsitiridis, Savas	5/ABC/R0013214	Monetary Contribution	07/10/12	\$1,500.00		
Tsitiridis, Savas	6/ABC/R0015651	Monetary Contribution	01/11/13	\$3,750.00		
Tsitiridis, Savas	16/M/R0015971	Contribution Refund	01/14/13	(\$1,050.00)		
Tsitiridis, Savas	16/M/R0016143	Contribution Refund	03/05/13	(\$1,300.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>(\$1,050.00)</u>		

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
NYC Stagehands NYS PAC	2/ABC/R0005604	Monetary Contribution	11/18/10	\$2,500.00		
TPU Local One IATSE NYC	3/ABC/R0007528	Monetary Contribution	07/07/11	\$2,450.00		
NYC Stagehands NYS PAC	6/ABC/R0013917	Monetary Contribution	07/07/12	\$2,450.00	(1)	
NYC Stagehands NYS PAC	16/M/R0016173	Contribution Refund	03/11/13	(\$2,450.00)		Untimely
NYC Stagehands NYS PAC	16/M/R0018521	Contribution Refund	05/07/13	(\$2,500.00)		
TPU Local One IATSE NYC	14/ABC/R0037689	Monetary Contribution	10/21/13	\$1,000.00		
Total				\$3,450.00		
Office Limit				<u>\$4,950.00</u>		
Amount Over the Limit				<u>(\$1,500.00)</u>		
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Verma, Davinder	6/ABC/R0014472	Monetary Contribution	10/19/12	\$5,000.00		
Verma, Davinder	16/M/R0016144	Contribution Refund	03/05/13	(\$50.00)		Timely
Total				\$4,950.00		
Office Limit				<u>\$4,950.00</u>		
Amount Over the Limit				<u>\$0.00</u>		
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NY HOTEL & MOTEL TRADES COUN	2/ABC/R0005637	Monetary Contribution	12/17/10	\$2,500.00		
NY Hotel and Motel Trades Coun	3/ABC/R0007524	Monetary Contribution	06/29/11	\$1,250.00		
H.T.C. Cope Non-Fed Committee	5/ABC/R0013176	Monetary Contribution	07/11/12	\$1,200.00		
NY HOTEL & MOTEL TRADES COUN	6/ABC/R0015435	Monetary Contribution	01/08/13	\$1,200.00		
NY HOTEL & MOTEL TRADES COUN	16/M/R0016137	Contribution Refund	03/05/13	(\$1,200.00)		Timely
Total				\$4,950.00		
Office Limit				<u>\$4,950.00</u>		
Amount Over the Limit				<u>\$0.00</u>		

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
Latino, Jeffrey W	3/ABC/R0007473	Monetary Contribution	07/07/11	\$4,000.00		
Latino, Jeffrey W	4/ABC/R0009378	Monetary Contribution	12/10/11	\$250.00		
Latino, Jeffrey W	5/ABC/R0012971	Monetary Contribution	07/10/12	\$1,500.00		
Latino, Jeffrey W	16/M/R0014847	Contribution Refund	12/20/12	(\$800.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		
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Levine, Ronny	4/ABC/R0010337	Monetary Contribution	01/11/12	\$2,500.00		
Levine, Ronny	5/ABC/R0012098	Monetary Contribution	06/25/12	\$2,500.00		
Levine, Ronny	16/M/R0014844	Contribution Refund	12/20/12	(\$50.00)		Timely
Levine, Ronny	15/ABC/R0039408	Monetary Contribution	10/28/13	\$4,950.00		
Levine, Ronny	16/M/R0040881	Contribution Refund	11/04/13	(\$4,950.00)		
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		
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Brunckhorst, Frank	4/ABC/R0009640	Monetary Contribution	12/20/11	\$5,000.00		
Brunckhorst, Frank	16/M/R0011794	Contribution Refund	06/22/12	(\$50.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		

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New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
Correction Officers Benevolent	4/ABC/R0008894	Monetary Contribution	11/14/11	\$175.00		
Correction Officers Benevolent	4/ABC/R0010367	Monetary Contribution	01/09/12	\$4,950.00		
Correction Officers Benevolent	16/M/R0011795	Contribution Refund	06/22/12	(\$175.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
Neil, David	2/ABC/R0005972	Monetary Contribution	01/07/11	\$2,500.00		
Neil, David	4/ABC/R0009109	Monetary Contribution	12/12/11	\$4,950.00		
Neil, David	16/M/R0011802	Contribution Refund	06/22/12	(\$2,500.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
Kwatra, Lall G	3/ABC/R0008037	Monetary Contribution	07/06/11	\$2,500.00		
Kwatra, Lall G	3/ABC/R0008038	Monetary Contribution	07/06/11	\$2,500.00		
Kwatra, Lall G	16/M/R0008678	Contribution Refund	12/16/11	(\$50.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
Local 94 PAC State Fund	1/ABC/R0005234	Monetary Contribution	05/12/10	\$2,500.00		
Local 94 PAC State Fund	2/ABC/R0005603	Monetary Contribution	11/15/10	\$2,500.00		
Local 94 PAC State Fund	16/M/R0042928	Contribution Refund	02/18/11	(\$50.00)		
Local 94 PAC State Fund	3/ABC/R0006578	Monetary Contribution	06/01/11	\$1,000.00		
Local 94 PAC State Fund	16/M/R0008680	Contribution Refund	12/16/11	(\$1,000.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		
Brett Howard, Loma	7/ABC/R0016172	Monetary Contribution	01/09/13	\$4,950.00		
Lorna, Howard	6/ABC/R0015003	Monetary Contribution	01/09/13	\$4,950.00		
Brett Howard, Lorna	Unreported	Contribution Refund	11/06/15	(\$4,950.00)		Untimely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		
Espinoza, Cholene	13/ABC/R0029885	Monetary Contribution	09/25/13	\$4,950.00		
Espinoza, Cholene	13/ABC/R0030302	Monetary Contribution	09/26/13	\$4,950.00		
Espinoza, Cholene	Unreported	Contribution Refund	11/05/15	(\$4,950.00)		Untimely
				Total		
				Office Limit		
				Amount Over the Limit		
				<u>\$0.00</u>		

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
Toulopoulos, Steven	4/ABC/R0009518	Monetary Contribution	12/23/11	\$250.00		
Toulopoulos, Steven	5/ABC/R0012116	Monetary Contribution	06/15/12	\$250.00		
Toulopoulos, Steven	7/ABC/R0016878	Monetary Contribution	03/08/13	\$1,000.00		
Toulopoulos, Steven	7/ABC/R0017106	Monetary Contribution	03/11/13	\$1,000.00		
Touliopoulus, Steven	14/ABC/R0033187	Monetary Contribution	10/09/13	\$3,000.00		
Toulopoulos, Steven	Unreported	Contribution Refund	11/04/15	(\$550.00)		Untimely
				Total		
				Office Limit		
				Amount Over the Limit	<u>\$0.00</u>	
<hr/>						
Florentinos, Antonios	5/ABC/R0013228	Monetary Contribution	07/05/12	\$1,000.00		
Florentinos, Antonios	6/ABC/R0015292	Monetary Contribution	01/10/13	\$1,000.00		
Florentinos, Antonios	14/ABC/R0031266	Monetary Contribution	10/01/13	\$4,950.00		
Florentinos, Antonios	Unreported	Contribution Refund	11/04/15	(\$2,000.00)		Timely
				Total		
				Office Limit		
				Amount Over the Limit	<u>\$0.00</u>	

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
Ingrassia, Stephanie A	2/ABC/R0006234	Monetary Contribution	01/03/11	\$2,500.00		
Ingrassia, Stephanie A	16/M/R0042868	Contribution Refund	01/07/12	(\$2,500.00)	# (2)	
Ingrassia, Stephanie A	4/ABC/R0010950	Monetary Contribution	01/07/12	\$4,950.00		
Ingrassia, Stephanie A	16/M/R0010951	Contribution Refund	01/17/12	(\$4,950.00)	# (2)	
Ingrassia, Stephanie A	7/ABC/R0016730	Monetary Contribution	03/04/13	\$2,450.00		
Ingrassia, Stephanie A	Unreported	Contribution Refund	01/08/16	(\$4,950.00)	(3)	Untimely
				Subtotal		
				Undocumented Transactions	\$7,450.00	
				Total	\$4,950.00	
				Office Limit	<u>\$4,950.00</u>	
				Amount Over the Limit	<u>\$0.00</u>	
McPherson-McMullan, Rachel	1/ABC/R0005204	Monetary Contribution	05/24/10	\$250.00		
McPherson-McMullan, Rachel	2/ABC/R0006249	Monetary Contribution	07/07/10	\$750.00		
McPherson-McMullan, Rachel	1/ABC/R0005378	Monetary Contribution	07/11/10	\$750.00		
McPherson-McMullan, Rachel	16/M/R0042924	Contribution Refund	07/12/10	(\$750.00)	# (2)	
McPherson-McMullan, Rachel	2/ABC/R0005946	Monetary Contribution	12/13/10	\$3,950.00		
McPherson-McMullan, Rachel	16/M/R0006250	Contribution Refund	02/22/11	(\$750.00)		
McPherson-McMullan, Rachel	7/ABC/R0016768	Monetary Contribution	02/23/13	\$750.00		
McPherson-McMullan, Rachel	Unreported	Contribution Refund	01/08/16	(\$750.00)	(3)	Untimely
				Subtotal	\$4,200.00	
				Undocumented Transactions	\$750.00	
				Total	\$4,950.00	
				Office Limit	<u>\$4,950.00</u>	
				Amount Over the Limit	<u>\$0.00</u>	

Exhibit VI
New Yorkers for de Blasio
Refunded Contributions Over the Limit
(see Finding #5)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely
NYS Laborers' PAC State Fund	1/ABC/R0005232	Monetary Contribution	05/10/10	\$2,500.00		
New York State Laborers	3/ABC/R0007458	Monetary Contribution	06/30/11	\$2,500.00		
New York State Laborers	4/ABC/R0010314	Monetary Contribution	01/06/12	\$2,500.00		
New York State Laborers	16/M/R0010743	Contribution Refund	02/10/12	(\$50.00)		
New York State Laborers	16/M/R0018520	Contribution Refund	05/07/13	(\$50.00)		
New York State Laborers	N/A	Contribution Refund	11/21/16	(\$2,450.00)		Untimely
Total				\$4,950.00		
Office Limit				\$4,950.00		
Amount Over the Limit				<u>\$0.00</u>		

Notes:

- (1) This contribution was deleted from the Campaign's reporting. The Campaign failed to explain why it was deleted, as requested in its Statement Review #6.
 - (2) The Campaign failed to provide the credit card processing slip for this expenditure refund.
 - (3) In a response to the Notice of Alleged Violations and Recommended Penalties dated January 11, 2016, the Campaign provided a copy of a cashier's check to refund the over the limit contribution due to a previously undocumented refund(s) that was not considered in the calculation of the contribution total. While the issuance of the refund check does ensure that the contributor was not over the limit, CFB staff is unable to verify whether the undocumented refund(s) was issued as reported.
- # Undocumented refunds are not considered in the calculation of the contribution total. See also Finding #10 a).

Exhibit VII
New Yorkers for de Blasio
Refunded Corporate Contributions
(see Finding #6 a)

Name	Statement/Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely Refunded
Mogul, Stuart	9/ABC/R0020196	Monetary Contribution	05/13/13	\$200.00	(1)	
Mogul, Stuart	16/M/R0022466	Contribution Refund	07/24/13	(\$200.00)		Timely
Total				<u>\$0.00</u>		
Wexler, Howard	4/ABC/R0010402	Monetary Contribution	01/11/12	\$25.00	(2)	
Wexler, Howard	16/M/R0014852	Contribution Refund	12/20/12	(\$25.00)		Timely
Total				<u>\$0.00</u>		
Rubler, Neil	5/ABC/R0012578	Monetary Contribution	07/03/12	\$500.00	(3)	
Rubler, Neil	16/M/R0022465	Contribution Refund	07/24/13	(\$500.00)		Untimely
Total				<u>\$0.00</u>		
Anand, Ami	5/ABC/R0011698	Monetary Contribution	06/12/12	\$175.00	(4)	
Anand, Ami	16/M/R0016002	Contribution Refund	02/20/13	(\$175.00)		Untimely
Total				<u>\$0.00</u>		

Exhibit VII
New Yorkers for de Blasio
Refunded Corporate Contributions
(see Finding #6 a)

Name	Statement/Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely Refunded
DiMaria, Thomas	5/ABC/R0011939	Monetary Contribution	06/09/12	\$175.00	(5)	
DiMaria, Thomas	16/M/R0014853	Contribution Refund	12/20/12	(\$175.00)		Timely
Total				<u>\$0.00</u>		
Castle, John	4/ABC/R0009886	Monetary Contribution	01/09/12	\$4,000.00	(6)	
Castle, John	6/M/R0014854	Contribution Refund	12/20/12	(\$4,000.00)		Untimely
Total				<u>\$0.00</u>		
Mahta, Navin C.	3/ABC/R0008032	Monetary Contribution	07/06/11	\$2,000.00	(7)	
Mahta, Navin C.	4/M/R0008697	Contribution Refund	12/12/11	(\$2,000.00)		Timely
Total				<u>\$0.00</u>		
Neira, Marco	15/ABC/R0040952	Monetary Contribution	11/04/13	\$300.00	(8)	
Neira, Marco	N/A	Contribution Refund	02/11/15	(\$300.00)		Timely
Total				<u>\$0.00</u>		

Exhibit VII
New Yorkers for de Blasio
Refunded Corporate Contributions
(see Finding #6 a)

Name	Statement/Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely Refunded
Hello World Communications	N/A	Unreported In-Kind	11/06/13	\$86.20		
Hello World Communications	N/A	Contribution Refund	02/11/15	(\$86.20)		Timely
Total				<u>\$0.00</u>		
<hr/>						
Seneca Club of Kings County	3/ABC/R0006746	Monetary Contribution	06/24/11	\$200.00		
Seneca Club of Kings County	4/M/R00008698	Contribution Refund	12/19/11	(\$200.00)		Timely
Total				<u>\$0.00</u>		

Notes:

- (1) Although the Campaign reported the contribution as shown, the documentation provided indicates that this contribution was from Dr. Stuart J. Mogel, who is incorporated as Dr. Stuart J. Mogel, Podiatry, O.B.S., P.C. at the reported address for this contribution.
- (2) Although the Campaign reported the contribution as shown, the documentation provided indicates that this contribution was made from a corporate credit card account.
- (3) Although the Campaign reported the contribution as shown, the documentation provided indicates that this contribution was from Vantage Properties LLC.
- (4) Although the Campaign reported the contribution as shown, the documentation provided indicates that this contribution was from Ami Anand Shah M.D. P.C.
- (5) Although the Campaign reported the contribution as shown, the documentation provided indicates that this contribution was from Thomas J. DiMaria DDS P.C.
- (6) Although the Campaign reported the contribution as shown, the documentation provided indicates that this contribution was from Branford Castle Inc.
- (7) Although the Campaign reported the contribution as shown, the documentation provided indicates that this contribution was from Dr. Navin C. Mehta F.A.C.S., P.C.
- (8) Although the Campaign reported the contribution as shown, the documentation provided indicates that this contribution was from Sunrise Cooperative.

Exhibit VIII
New Yorkers for de Blasio
Fundraiser In-Kind Contributions
(see Findings #6b and #8b)

Name	Statement/ Schedule/ Transaction ID	Purpose Code	Invoice Date	Paid Date	Amount	Notes
Abe Biderman's Office	N/A	N/A	03/14/11	N/A	N/A	(1)
Carmel Car Service	BOE	FUNDR	06/21/11	02/17/15	\$25.00	(1)
Pardes Restaurant	N/A	N/A	01/03/12	N/A	N/A	
Boies, Schiller and Flexner	BOE	FUNDR	02/07/12	02/17/15	\$25.00	(1)
Royal Palace of India	N/A	N/A	06/20/12	N/A	N/A	(1)
Dublin Research & Consulting	BOE	FUNDR	06/25/12	02/17/15	\$25.00	(1)
Mayerson & Associates	BOE	FUNDR	07/11/12	02/17/15	\$25.00	(1)
Lindenhurst Diner	N/A	N/A	07/11/12	N/A	N/A	
Hiltzik Strategies	BOE	FUNDR	01/07/13	02/17/15	\$25.00	(1)
Gibson Dunn & Crutcher LLP	BOE	FUNDR	01/07/13	02/17/15	\$25.00	(1)
Hudson Inc	BOE	FUNDR	04/30/13	02/17/15	\$25.00	(1)
Boies, Schiller and Flexner	BOE	FUNDR	05/06/13	02/17/15	\$25.00	(1)
Mumbai Grill	N/A	N/A	05/10/13	N/A	N/A	(1), (2)
Café Lore	BOE	FUNDR	07/02/13	02/17/15	\$25.00	
Maxwells	N/A	N/A	07/29/13	N/A	N/A	(1), (3)
Fordham United Methodist Church	N/A	N/A	08/17/13	N/A	N/A	(3)
Mercury Public Affairs	BOE	FUNDR	09/16/13	02/17/15	\$25.00	(1)
Devi Indian Restaurant	N/A	N/A	10/01/13	N/A	N/A	(1)
Durst Fetner	N/A	N/A	10/02/13	N/A	N/A	(1), (3)
Richi Rich Palace	N/A	N/A	10/04/13	N/A	N/A	(1), (3)
Shahi Durbar Banquet Hall	N/A	N/A	10/05/13	N/A	N/A	(1)
Sitt Asset Management	N/A	N/A	10/07/13	N/A	N/A	(1)
Boies, Schiller and Flexner	BOE	FUNDR	10/10/13	02/17/15	\$25.00	(1)
Piccola Venezia	N/A	N/A	10/19/13	N/A	N/A	(1), (3)
Gibson Dunn & Crutcher LLP	BOE	FUNDR	10/21/13	02/17/15	\$25.00	(1)
Mercury Group	N/A	N/A	10/24/13	N/A	N/A	(1), (3)

Exhibit VIII
New Yorkers for de Blasio
Fundraiser In-Kind Contributions
(see Findings #6b and #8b)

Name	Statement/ Schedule/ Transaction ID	Purpose Code	Invoice Date	Paid Date	Amount	Notes
Dave Banquet Hall	N/A	N/A	10/27/13	N/A	N/A	(1), (3)
Nixon Peabody	N/A	N/A	10/29/13	N/A	N/A	(1), (4)

Notes:

- (1) This is an in-kind contribution from a corporate entity. See Finding #6 b).
- (2) In its Draft Audit Report response, the Campaign stated that this event is associated with a previously reported expenditure, 16/F/R0033134, however the Campaign previously stated that this expenditure is associated with an earlier event at the same location dated December 3, 2012. The Campaign failed to explain this discrepancy.
- (3) This finding was identified as a result of the Campaign's response to a document request dated July 26, 2016.
- (4) In its Draft Audit Report response, the Campaign stated that this event was not a fundraiser, however, the Campaign previously provided a contributor list for this reported event. In its response to the Notice of Alleged Violations, the Campaign stated that the event was cancelled and erroneously included on the list of fundraising events. It provided a copy of an email from one Campaign staffer to another asking to remove this from the list of "open events." However, the Campaign did not explain why it had a list of contributions received from an event that did not occur. It also did not explain how the contributions were obtained, if the contributions were not received at the event.

Exhibit IX
New Yorkers for de Blasio
Refunded Unregistered Political Committees
(see Finding #7a)

Name	Statement/Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes	Timely/ Untimely Refunded
Stationary Eng Education Fund	5/ABC/R0011612	Monetary Contribution	05/17/12	\$1,000.00		
Stationary Eng Education Fund	6/ABC/R0013545	Monetary Contribution	07/12/12	\$1,950.00		
Stationary Eng Education Fund	16/M/R0014838	Contribution Refund	12/20/12	(\$1,000.00)		
Stationary Eng Education Fund	16/M/R0016170	Contribution Refund	03/11/13	(\$950.00)		
Stationary Eng Education Fund	16/M/R0016171	Contribution Refund	03/11/13	(\$1,000.00)		Untimely
<hr/>						
CABLE PAC	3/ABC/R0007381	Monetary Contribution	06/27/11	\$1,000.00		
CABLE PAC	16/M/R0008696	Contribution Refund	12/19/11	(\$1,000.00)		Timely
<hr/>						
Friends of Maurice Hinchey	3/ABC/R0007346	Monetary Contribution	06/22/11	\$1,000.00		
Friends of Maurice Hinchey	16/M/R0008694	Contribution Refund	12/19/11	(\$1,000.00)		Timely
<hr/>						
IAHFIAW Local 12 PAC Fund	3/ABC/R0006571	Monetary Contribution	06/01/11	\$1,000.00		
IAHFIAW Local 12 PAC Fund	16/M/R0008693	Contribution Refund	12/19/11	(\$1,000.00)		Timely
<hr/>						
1199/SEIU NYS Pol. Action Fund	1/ABC/R0005231	Monetary Contribution	04/29/10	\$4,950.00	(1)	Untimely
<hr/>						
Council of School Supervisors	1/ABC/R0005211	Monetary Contribution	05/05/10	\$1,000.00	(2)	Timely

Notes:

- (1) This political committee registered with the CFB on January 26, 2011.
- (2) This political committee registered with the CFB on December 2, 2010.

Exhibit X
New Yorkers for de Blasio
Suspected Intermediaries
(see Finding #9a)

11/12/2014 20:14

**New York City Campaign Finance Board
Campaign Finance Information System
Suspected Intermediaries by Employer Name and Date Received
Employer Name: Corizon
Date Received: 10/28/2013**

Election: 2013

Candidate: de Blasio, Bill (ID:326-P)

Office: 1 (Mayor)

Contributor Name	Employer Address	Date Received	Intermediary Number	Stmt/Sch/Ref	Amount Provide Your Response Here
<u>Employer Name: Corizon</u>					
Balilo, Ofelia	4904 19th Ave	10/28/2013		15/ABC/R0039543	\$100.00
Balilo, Ofelia	4904 19th Ave	10/28/2013		15/ABC/R0039544	\$25.00
Huffstead Jr., Ruel A.	4904 19th Ave	10/28/2013		15/ABC/R0039528	\$100.00
Huffstead Jr., Ruel A.	4904 19th Ave	10/28/2013		15/ABC/R0039530	\$25.00
Hughes, Ronald	4904 19th Ave	10/28/2013		15/ABC/R0039553	\$20.00
Lerman, Sandra	4904 19th Avenue	10/28/2013		15/ABC/R0039531	\$100.00
Parboo, Elizabeth	1414 Hazen Street	10/28/2013		15/ABC/R0039546	\$100.00
Parboo, Elizabeth	1414 Hazen Street	10/28/2013		15/ABC/R0039547	\$25.00
Parsaram, Ricky	4904 19th Ave	10/28/2013		15/ABC/R0039516	\$20.00
Parsaram, Ricky	4904 19th Ave	10/28/2013		15/ABC/R0039517	\$100.00
Persaud, Marie	1583 Midland Drive	10/28/2013		15/ABC/R0039522	\$100.00
Persaud, Marie	1583 Midland Drive	10/28/2013		15/ABC/R0039523	\$15.00
Ramsundar, Ricky	4904 19th Ave	10/28/2013		15/ABC/R0039535	\$100.00
Ramsundar, Ricky	4904 19th Ave	10/28/2013		15/ABC/R0039538	\$15.00
Richards-Sims, Boblyar	4904 19th Avenue	10/28/2013		15/ABC/R0039511	\$20.00
Totarman, Vienna	275 Atlantic Ave	10/28/2013		15/ABC/R0040900	\$175.00
Ramlochan, Naresh	4904 Hazen Street	10/30/2013		15/ABC/R0039941	\$100.00
<u>Employer Name: Corizon Correctional Medical</u>					
Park, Joon	49-04 19th Ave	10/30/2013		15/ABC/R0039958	\$100.00
Park, Yungdo	15-15 Hazen St	10/30/2013		15/ABC/R0039931	\$200.00
Total:					\$1,440.00

Exhibit XI
New Yorkers for de Blasio
Undocumented Reported Intermediaries
(see Finding #9b)

Intermediary ID	Intermediary	Notes
4	Barber, Benjamin	
35	Brach, Jack	
5	Chatwal, Sant	
2150	Colon, Roberto	
86	Dinallo, Eric	(1)
75	Eisenhofer, Jay	
2144	Gagliardi, Paul	
80	Giuffre, John	
11	Hellman, Moshe	(2)
2128	Lefkowitz, Shimon	(1)
54	Levine, Robert	(2)
2154	Mallah, Sheldon	(3)
2109	Mehta, Kamlesh	
28	Neu, John	(4)
2155	Rechnitz, Jona	(1)
25	Sanna, Robert	
2114	Scheinman, Martin	(2), (5)
63	Spitzer, Izzy	

Exhibit XI
New Yorkers for de Blasio
Undocumented Reported Intermediaries
(see Finding #9b)

Notes:

- (1) The Campaign provided a copy of an email between the Campaign and the intermediary affirming contributions intermediated. This is insufficient, as the Campaign did not provide a signed Intermediary Statement as required by Rule 4-01(b)(5).
- (2) The Campaign deleted this intermediary, but failed to explain why the individual was entered as an intermediary in the first place and how the underlying contribution(s) were delivered to the Campaign, if not intermediated.
- (3) The Campaign stated that this intermediary was reported as having intermediated a contribution from Sheldon Mallah, Transaction 14/ABC/R0034332, in error. Although a contributor would not have to report himself as an intermediary, the discrepancies between the reported address and employment information from Mr. Mallah, the contributor, and Mr. Mallah, the intermediary, do not indicate that these are the same individual.
- (4) In its Draft Audit Report response, the Campaign stated that it was unable to gain an Intermediary Statement from this individual because he is currently deceased. While this is understandably tragic, the Campaign is required to collect this documentation contemporaneously with receiving the contributions.
- (5) The Campaign stated that the Candidate personally solicited this intermediary's sole reported contribution from Jeff Brown, Transaction 6/ABC/R0015547, and that the reporting of an intermediary was in error. However, the Campaign failed to provide either backup documentation for the contribution demonstrating that it was a credit card processed contribution or an affirmation from the contributor to support its explanation.

Exhibit XII
New Yorkers for de Blasio
Transactions Reported as Intermediated That Do Not Appear on an Intermediary Statement
(see Finding #9c)

Intermediary	Statement/ Schedule/	Transaction ID	Contributor Name	Amount	Notes
ID	Intermediary Name				
6	Craig, Josephine	4/ABC/R0009949	Arzano, Louis	\$200.00	
6	Craig, Josephine	4/ABC/R0010478	Barnett, Alazia	\$500.00	
6	Craig, Josephine	4/ABC/R0010477	Barnett, Michael	\$500.00	
6	Craig, Josephine	4/ABC/R0010471	Barnett, Robert	\$500.00	
6	Craig, Josephine	4/ABC/R0010475	Barnett, Sara	\$500.00	
6	Craig, Josephine	4/ABC/R0009543	Genack, Ahuva	\$175.00	
6	Craig, Josephine	4/ABC/R0009512	Genack, Azriel	\$325.00	
6	Craig, Josephine	4/ABC/R0009571	Goich, Keith	\$200.00	
6	Craig, Josephine	4/ABC/R0009981	Haas, Jacob	\$175.00	
6	Craig, Josephine	4/ABC/R0009582	Haas, Raizy	\$175.00	
6	Craig, Josephine	4/ABC/R0010398	Haas, Shaindy	\$100.00	
6	Craig, Josephine	4/ABC/R0009581	Hartstein, Elliot M	\$175.00	
6	Craig, Josephine	4/ABC/R0009580	Hartstein, Rose	\$175.00	
6	Craig, Josephine	4/ABC/R0009540	Hertz, Dov	\$500.00	
6	Craig, Josephine	4/ABC/R0009951	Ibroci, Neil	\$200.00	
6	Craig, Josephine	4/ABC/R0009558	Kwestel, Marc	\$500.00	
6	Craig, Josephine	4/ABC/R0009546	Lasker, Raizy	\$175.00	
6	Craig, Josephine	4/ABC/R0009548	Lasker, Avrum	\$175.00	
6	Craig, Josephine	4/ABC/R0009948	Loskant, Charles	\$200.00	
6	Craig, Josephine	4/ABC/R0009560	Mannarino, Anthony	\$400.00	
6	Craig, Josephine	4/ABC/R0009953	Montano, Joseph	\$200.00	
6	Craig, Josephine	4/ABC/R0009567	Rosner, Alexander	\$175.00	
6	Craig, Josephine	4/ABC/R0009569	Rosner, Malkie	\$175.00	
6	Craig, Josephine	4/ABC/R0009542	Schwartz, Jennifer	\$200.00	
6	Craig, Josephine	4/ABC/R0009564	Shteyn, Iosif	\$175.00	
6	Craig, Josephine	4/ABC/R0009562	Shtyin, Lyudmila	\$175.00	

Exhibit XII
New Yorkers for de Blasio
Transactions Reported as Intermediated That Do Not Appear on an Intermediary Statement
(see Finding #9c)

Intermediary		Statement/ Schedule/			
ID	Intermediary Name	Transaction ID	Contributor Name	Amount	Notes
6	Craig, Josephine	4/ABC/R0009577	Wertzberger, Kalman	\$175.00	
30	Barrett, Jean	14/ABC/R0031266	Fiorentinos, Antonios	\$4,950.00	(1)
61	Schaps, Richard	4/ABC/R0009573	Davis, Gary	\$2,500.00	
61	Schaps, Richard	4/ABC/R0009550	Weiss, Ronald	\$4,950.00	
2108	Einhorn, Abraham	6/ABC/R0015535	Goldburd, Annie	\$175.00	
2112	Greenburger, Francis	6/ABC/R0015473	Kantos, Robert	\$2,500.00	
2119	Check, Darren	12/ABC/R0028810	Barroway, Andrew	\$2,475.00	
2119	Check, Darren	12/ABC/R0028807	Berman, Stuart	\$1,000.00	
2119	Check, Darren	12/ABC/R0028803	Castaldo, Gregory	\$1,000.00	
2119	Check, Darren	12/ABC/R0028802	Goodson, John	\$2,000.00	
2119	Check, Darren	12/ABC/R0028804	Handler, Sean	\$1,000.00	
2119	Check, Darren	12/ABC/R0028806	Keil, Matt	\$2,000.00	
2119	Check, Darren	5/ABC/R0012599	Kessler, David	\$250.00	
2119	Check, Darren	12/ABC/R0028808	Kessler, David	\$2,475.00	
2119	Check, Darren	12/ABC/R0028812	Lynch, Patrick	\$2,475.00	
2119	Check, Darren	12/ABC/R0028801	Meltzer, Joseph	\$1,000.00	
2119	Check, Darren	12/ABC/R0028805	Rudy, Lee	\$1,000.00	
2119	Check, Darren	12/ABC/R0028809	Topaz, Marc	\$2,475.00	
2119	Check, Darren	12/ABC/R0028800	Zivitz, Andrew	\$500.00	
2140	Hocking, Charles	12/ABC/R0029482	Walrath, Susan	\$400.00	
Total				<u>\$42,250.00</u>	

Notes:

(1) This finding was the result of an error included in the Draft Audit Report, and therefore, this finding is not included in the penalty calculations.

Exhibit XIII
New Yorkers for de Blasio
Transactions Appearing on an Intermediary Statement That Were Not Reported as Intermediated
(see Finding #9c)

Intermediary ID	Intermediary Name	Statement/ Schedule/ Transaction ID	Contributor Name	Amount	Notes
61	Schaps, Richard	Unreported	Crabtree, Bill	\$400.00	(1)
77	Lieber, Janno N	Unreported	Levy, Michael	\$2,000.00	(2)
77	Lieber, Janno N	Unreported	Moss, Jeremy	\$600.00	(2)
77	Lieber, Janno N	5/ABC/R0012791	Orbison, Roger	\$240.00	(3)
77	Lieber, Janno N	5/ABC/R0012785	Silverstein, Roger	\$600.00	(3)
77	Lieber, Janno N	Unreported	Williamson, Richard	\$240.00	(2)
2140	Hocking, Charles	Unreported	Mehrotra, Sandeep	\$400.00	(2)
2145	Woloz, Michael	14/ABC/R0031266	Florentinos, Antonio	\$4,950.00	(4)
30	Barrett, Jean	Unknown	Florentinos, Antonios	\$1,000.00	(4), (5)
Total				<u>\$10,430.00</u>	

Exhibit XIII
New Yorkers for de Blasio
Transactions Appearing on an Intermediary Statement That Were Not Reported as Intermediated
(see Finding #9c)

Notes:

- (1) The Campaign reported a contribution from "Crabtree, First" (14/ABC/R0034925). If that contribution is the contribution listed above, the Campaign must amend its disclosure statements to report the correct contributor name.
- (2) *See* also Finding #1 b).
- (3) This contribution appears twice on Intermediary Statements for this intermediary in the same amount. The Campaign must explain if there was a single intermediated contribution or two intermediated contributions from this contributor. If two, the Campaign must provide documentation for both intermediated contributions.
- (4) This finding was the result of an error included in the Draft Audit Report dated December 8, 2014 and, therefore, this finding is not included in the penalty calculations.
- (5) This transaction is listed as unknown because there are two possible \$1,000 contributions from this contributor. However, one is currently reported as intermediated by Richard Emery. As this contributor and contribution amount appears on Intermediary Statements for both intermediaries, it is unclear whether there were two separate \$1,000 contributions or one contribution claimed as intermediated by two different intermediaries. (Two \$1,000 contributions by Mr. Fiorentinos appear on the Intermediary Statements for Jean Barrett.)

Exhibit XIV
New Yorkers for de Blasio
Misreported Intermediated Contributions
(see Finding #9d)

Intermediary ID	Intermediary Name	Reported Contributor Name	Reported Contributor Amount	Contributor Name Per Intermediary Statement	Amount Per Interm. Statement	Notes
22	Stamm, Joseph B	Spivak, Howard	\$500.00	Spivak, Howard	\$250.00	
24	Wilhelm, John	Marco, John	\$2,000.00	Marco, John	\$4,000.00	(1)
24	Wilhelm, John	Tannu-Khan, Zaina	\$100.00	Tannu-Khan, Zaina	\$65.00	(1)
26	Strauss, Audrey	Restler, Peter	\$500.00	Restler, Susan	\$500.00	(1)
26	Strauss, Audrey	Whitman, Trudy	\$150.00	Whitman, Trudy	\$175.00	
61	Schaps, Richard	Abu-Ghazaleh, Walid	\$500.00	Abu-Ghazaleh, Walid	\$400.00	(1)
61	Schaps, Richard	Bloom, Howard	\$2,500.00	Bloom, Howard	\$400.00	(1)
61	Schaps, Richard	Massoni, John	\$500.00	Massoni, John	\$400.00	(1)
61	Schaps, Richard	Schaps, Jordan	\$750.00	Schaps, Jordan	\$4,200.00	(1)
61	Schaps, Richard	Silverton, Richard	\$500.00	Silverton, Richard	\$1,900.00	
2106	Koval, Marianna	Silberman, Claire	\$1,000.00	Silberman, Claire	\$100.00	(2)
2107	Emery, Richard	Statharos, Dorthy	\$1,000.00	Statharos, George	\$1,000.00	(1)
2108	Einhorn, Abraham	Friedman, Edward	\$250.00	Friedman, Edward	\$175.00	(1)
2110	Thamkittikasem, Jeff	McAleenan, Kevin	\$100.00	McAleenan, Kevin	\$150.00	
2121	Lee, Allison	Cole, Henry	\$200.00	Cole, Henry	\$175.00	
2131	Koplin, Richard	Morgan, Danielle S	\$200.00	Morgan, Danielle S	\$250.00	
2140	Hocking, Charles	Barboe, Edward	\$400.00	Barboe, Edward	\$300.00	(3)
2145	Woloz, Michael	Connelly, Maureen	\$400.00	Connelly, Maureen	\$300.00	
2145	Woloz, Michael	Rosenzweig, Jason M	\$2,500.00	Rosenzweig, Jason M	\$2,450.00	(1)

Exhibit XIV
New Yorkers for de Blasio
Misreported Intermediated Contributions
(see Finding #9d)

Notes:

- (1) In the Draft Audit Report response, the Campaign provided backup documentation to support the reported contribution amount. However, the Campaign failed to address the discrepancy between what was reported as intermediated and what appears on the intermediary statement. The Campaign also failed to provide a revised Intermediary Statement from the intermediary.
- (2) In the Draft Audit Report dated December 8, 2014, this finding was attributed to the correct Intermediary but the incorrect Intermediary Number, 2105 instead of 2106. However, both numbers reference the same individual.
- (3) In the Draft Audit Report response, the Campaign provided documentation showing the contribution from Mr. Barboe was actually \$300.00. However, the Campaign failed to amend its reporting to reflect the correct contribution amount.

Exhibit XV
New Yorkers for de Blasio
Unreported Intermediated Contributions – D. Peebles
(see Finding #9e)

SCOTT D. METZNER
JUDITH M. GALLEN

515-39005

1-8
810 12

5121

Date: 10/16/13

Pay to the
order of:

New Yorks For DeBlasio

\$ 400 ⁰⁰/₁₀₀

Four hundred & 00/100

Dollars



Security Features
Include
Color on Back

citibank

Citigold®

CITIBANK, N.A. BR. #12
250 BROADWAY AT 96TH STREET
NEW YORK, NY 10024

For: BILL DEBLASIO



Signature on original

+

Rec'd 10-27
D Peebles

S15-59005

NEW YORKERS FOR DE BLASIO

32 Court Street, Suite 902, Brooklyn, NY 11201
NewYorkersforDeBlasio@gmail.com

Name: JUDITH LAURENT Home Address: [REDACTED]

City: NY State: NY Zip Code: 10024 Contribution Amount: \$ 400

Your Employer's Name: BRYAN CAVE Your Occupation: ATTORNEY

Your Work Address: [REDACTED] City: NY State: NY Zip Code: 10104

Home Phone: [REDACTED] Work Phone: [REDACTED] Cell Phone: _____

Fax: [REDACTED] E-mail address: _____

Please indicate if contribution is being made by: Cash _____ Money Order _____ Credit Card _____ Check

Please charge my: Visa MasterCard AMEX

Credit Card No: _____ Exp. Date: _____

Please make checks payable to: *New Yorkers for De Blasio* and mail to
New Yorkers for De Blasio
32 Court Street, Suite 902
Brooklyn, NY 11201

****Contributions from NYC residents up to \$175 will be matched 6 to 1 by the NYC Campaign Finance Board**
The maximum contribution for an individual to the campaign is \$4,950.**

*For contributions of more than \$400 only: Please complete "Doing Business" questionnaire.

The following statement is required by NYC Campaign Finance Board Rules:
I understand that State law requires that a contribution be in my name and be from my own funds. I hereby affirm that this contribution is being made from my personal funds, is not being reimbursed in any manner, and is not being made as a loan.
Credit Card Contribution: _____ from my personal credit card account, billed to and paid by me for my personal use and is not being made as a loan.

Your signature required [REDACTED] Date Signed: 10/20/13

Signature on original

- Contribution Requirements:**
- We cannot accept: contributions from corporations, partnerships or limited liability companies (LLCs); cash contributions that are more than \$100; any contributions over \$4,950. *If a contributor has business dealings with the City as defined in the Campaign Finance Act, the contribution limit is \$400.
 - Federal law prohibits contributions from foreign nationals.
 - We cannot accept contributions from political committees, unless the committee registers with the Campaign Finance Board. *If you wish to make a contribution from an unregistered committee, call Elana 646-361-2530 for a registration form.*
 - Contributions are not tax deductible.

State law prohibits making a contribution in someone else's name, reimbursing someone for a contribution made in your name, being reimbursed for a contribution made in your name, or claiming to have made a contribution when a loan is made.

Paid for by New Yorkers for De Blasio. Printed in house.

Updated 09/08/10

Rec'd 10-27
DPeebles

SCOTT D. METZNER

S15-39011

1-8
210 12

5122



Date 10/16/13

Pay to the order of New York Fed Reserve \$ 400 ⁰⁰/₁₀₀
FOUR HUNDRED & 00/100 Dollars

citibank

Citigold

CITIBANK, N.A. BR. #12
2350 BROADWAY AT 86TH STREET
NEW YORK, NY 10024



Signature on original

Rec'd 10-27
D Reales

515-31011

NEW YORKERS FOR DE BLASIO

32 Court Street, Suite 902, Brooklyn, NY 11201
NewYorkersforDeBlasio@gmail.com

Name: SCOTT METZNER Home Address: [REDACTED]

City: NY State: NY Zip Code: 10024 Contribution Amount: \$ 400

Your Employer's Name: JANUS MANAGEMENT, INC Your Occupation: COMMUNITY BUILDER

Your Work Address: [REDACTED] City: NY State: NY Zip Code: 10024

Home Phone: [REDACTED] Work Phone: [REDACTED] Cell Phone: _____

Fax: [REDACTED] E-mail address: [REDACTED]

Please indicate if contribution is being made by: Cash _____ Money Order _____ Credit Card _____ Check

Please charge my: Visa MasterCard AMEX

Credit Card No: _____ Exp. Date: _____

Please make checks payable to: *New Yorkers for De Blasio* and mail to
New Yorkers for De Blasio
32 Court Street, Suite 902
Brooklyn, NY 11201

****Contributions from NYC residents up to \$175 will be matched 6 to 1 by the NYC Campaign Finance Board****
The maximum contribution for an individual to the campaign is \$4,950.

*For contributions of more than \$400 only: Please complete "Doing Business" questionnaire.

The following statement is required by NYC Campaign Finance Board Rules:
I understand that State law requires that a contribution be in my name and be from my own funds. I hereby affirm that this contribution is being made from my personal funds, is not being reimbursed in any manner, and is not being made as a loan.
Credit Card Contribution [REDACTED] made from my personal credit card account, billed to and paid by me for my personal use and is not being made as a loan.

Your signature required [REDACTED] Date Signed: 10/21/13

Contribution Requirements:

- We cannot accept: contributions from corporations, partnerships or limited liability companies (LLCs); cash contributions that are more than \$100; any contributions over \$4,950. *If a contributor has business dealings with the City as defined in the Campaign Finance Act, the contribution limit is \$400.
- Federal law prohibits contributions from foreign nationals.
- We cannot accept contributions from political committees, unless the committee registers with the Campaign Finance Board. *If you wish to make a contribution from an unregistered committee, call Elana 646-361-2530 for a registration form.*
- Contributions are not tax deductible.


State law prohibits making a contribution in someone else's name, reimbursing someone for a contribution made in your name, being reimbursed for a contribution made in your name, or claiming to have made a contribution when a loan is made.


Paid for by New Yorkers for De Blasio. Printed in house.



Updated 09/08/10

Rec'd 10-27
D Peebles

D THOMAS N. DECARO *S15-39027* 5275
[Redacted] *September 11, 2013* 60-693/219
Date 351

PAY to the
Order of *New Yorkers for De Blasio* \$ *400*
Four hundred Dollars  Security Features Details on Back

 KeyBank National Association
White Plains, New York 10601
1-800-KEY2YOU Key.com

For [Redacted]  

Signature on original

✓
Rec'd 10-27
DPeebles

THOMAS R. CAMPBELL 04-03 515-21080 497
Date October 21, 2013 68-27/631 FL 1399
Pay to the Order of New Yorkers for De Blasio \$ 400.00
Four Hundred and 00/100 Dollars
Bank of America
ACH RVT 063100277
MP

Signature on original

5

Rec'd 10/27
D Peebles

Exhibit XVI
New Yorkers for de Blasio
Undocumented Transactions - Contribution Refunds
(see Finding #10a)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes
McPherson-McMullan, Rachel	16/M/R0042924	Contribution Refund	07/12/10	\$750.00	(1)
Giuliani, Cathy	16/M/R0042863	Contribution Refund	01/12/11	\$500.00	
Moller, Dominic	16/M/R0043035	Contribution Refund	07/07/11	\$4,950.00	
Cammarata, John	16/M/R0010947	Contribution Refund	07/20/11	\$4,950.00	(2)
Ingrassia, Stephanie A	16/M/R0042868	Contribution Refund	01/07/12	\$2,500.00	(1)
Peters, Suzanne	16/M/R0042869	Contribution Refund	01/10/12	\$2,500.00	
Moise, Anson	16/M/R0042870	Contribution Refund	01/12/12	\$250.00	
Ingrassia, Stephanie A	16/M/R0010951	Contribution Refund	01/17/12	\$4,950.00	(1)
Hill, Lyn S	16/M/R0010858	Contribution Refund	01/26/12	\$900.00	(2)
Levine, Paul	16/M/R0010949	Contribution Refund	01/30/12	\$100.00	(2)
Barrocas, Andrew	16/M/R0010860	Contribution Refund	02/24/12	\$1,000.00	
Rafailov, Michael	16/M/R0042935	Contribution Refund	05/17/12	\$200.00	
Berger, Shlome	16/M/R0012075	Contribution Refund	06/14/12	\$75.00	
Francis, Robert	16/M/R0012301	Contribution Refund	06/22/12	\$1,500.00	
American Express Refund	Unreported	Contribution Refund	07/01/12	\$500.00	(3), (4)
Fetner, Harold	16/M/R0042864	Contribution Refund	07/02/12	\$4,950.00	
Fetner, Sondra	16/M/R0042865	Contribution Refund	07/02/12	\$4,950.00	
Kane, Linda	16/M/R0042866	Contribution Refund	08/24/12	\$175.00	
Quaranta, Toby	16/M/R0042867	Contribution Refund	10/23/12	\$5.00	
American Express Refunds-2	Unreported	Contribution Refund	11/01/12	\$5,125.00	(3), (4)
American Express Refund	Unreported	Contribution Refund	12/01/12	\$1,000.00	(3), (4)
Sachs, Jeffery	16/M/R0043075	Contribution Refund	12/20/12	\$50.00	
Strauss, Audrey	16/M/R0015180	Receipt Adjustment	01/11/13	\$1,000.00	(5)
Crouse, James	16/M/R0042530	Contribution Refund	03/05/13	\$2,500.00	
Hemmerdinger, Elizabeth	16/M/R0042900	Contribution Refund	03/10/13	\$2,450.00	
Siegel, Seth	16/M/R0042901	Contribution Refund	03/12/13	\$1,000.00	

Exhibit XVI
New Yorkers for de Blasio
Undocumented Transactions - Contribution Refunds
(see Finding #10a)

Name	Statement/ Schedule/ Transaction ID	Transaction Type	Incurred/ Received/ Refunded Date	Amount	Notes
Firzner, Miriam	16/M/R0042871	Contribution Refund	04/15/13	\$175.00	
Jacobs, Jacqueline	16/M/R0042903	Contribution Refund	05/29/13	\$1,000.00	
Jacobs, Jessica	16/M/R0042902	Contribution Refund	05/29/13	\$1,000.00	
Deodal, Cecil	16/M/R0042872	Contribution Refund	06/13/13	\$125.00	
Stachenfeld, Bruce	16/M/R0042873	Contribution Refund	07/17/13	\$500.00	
Schlein, Michael	16/M/R0042874	Contribution Refund	07/31/13	\$1,000.00	
American Express Refund	Unreported	Contribution Refund	08/01/13	\$2,500.00	(3), (4)
Feldman, Steven	16/M/R0042875	Contribution Refund	08/06/13	\$2,475.00	
Boonshoft, Gina Maria	16/M/R0042878	Contribution Refund	08/14/13	\$1,000.00	
Goldberg, Brad	16/M/R0042876	Contribution Refund	08/18/13	\$4,200.00	
Thamkittikasem, Jeff	16/M/R0042877	Contribution Refund	08/19/13	\$1,000.00	
Keyes, Jayne C	16/M/R0042879	Contribution Refund	08/22/13	\$2,500.00	
Thamkittikasem, Chanut	16/M/R0042932	Contribution Refund	09/07/13	\$1,495.00	
Chatwal, Cikram	BOE	Contribution Refund	04/30/14	\$4,950.00	
Chatwal, Pardaman K	BOE	Contribution Refund	04/30/14	\$4,950.00	
Chatwal, Sant	BOE	Contribution Refund	04/30/14	\$4,950.00	
Chatwal, Vivek	BOE	Contribution Refund	04/30/14	\$4,950.00	
Rubenstein, Jessica	BOE	Contribution Refund	04/30/14	\$4,950.00	
Sodana, Salvatore	BOE	Contribution Refund	04/30/14	\$4,950.00	
Total				<u>\$97,500.00</u>	

Exhibit XVI
New Yorkers for de Blasio
Undocumented Transactions - Contribution Refunds
(see Finding #10a)

Notes:

- (1) *See* also Finding #5.
- (2) The Campaign provided an Excel spreadsheet printout to document this refund, with an email from PayPal that suggests that the spreadsheet came directly from the vendor. However, a review of the chart shows the addition of C-Smart Transaction IDs, which indicates that this record was recreated or modified. Therefore, it is considered insufficient documentation of the refund because it was not created in accordance with Rule 4-01(a).
- (3) *See* also Finding #1 b).
- (4) The exact refund date for this transaction(s) could not be discerned from the merchant account statement. However, the refund occurred in the same month of the date listed.
- (5) The Campaign did not provide a copy of the refund documentation for this transaction, however it provided a signed letter from Audrey Strauss, who affirmed that she received an electronic contribution refund from the Campaign.

Exhibit XVII

New Yorkers for de Blasio

Unreported Joint Expenditures – Petition Printing: NY Prints

(see Finding #12a)

★ DEMOCRATIC PARTY ★
DESIGNATING PETITION - NEW YORK COUNTY

11272

To the Board of Elections:

I, the undersigned, do hereby state that I am a duly enrolled voter of the Democratic Party and intend to vote at the next primary election to be held on September 21, 1954. I hereby designate the following named persons to be candidates for the nomination of each party to public office for the election to be held on such date.

NAME(S) OF CANDIDATE(S)	PUBLIC OFFICER	PLACE(S) OF RESIDENCE
BILL DE BLASIO	Mayor of the City of New York	443 15th Street Brooklyn, NY 11215

NAME(S) OF CANDIDATE(S)	PUBLIC OFFICER	PLACE(S) OF RESIDENCE
DANIEL SQUADRON	Public Advocate of the City of New York	482 Henry Street Brooklyn, New York 11231

NAME(S) OF CANDIDATE(S)	PUBLIC OFFICER	PLACE(S) OF RESIDENCE
SCOTT M. STRINGER	Comptroller of the City of New York	155 West 73rd Street, Apt. 1A New York, NY 10023

NAME(S) OF CANDIDATE(S)	PUBLIC OFFICER	PLACE(S) OF RESIDENCE
JULIE L. MEYER	President of the Borough of Manhattan of the City of New York	124 Hudson Street, Apt. 4C New York, NY 10013-2347

NAME(S) OF CANDIDATE(S)	PUBLIC OFFICER	PLACE(S) OF RESIDENCE
CYRUS VANCE, JR.	District Attorney of New York County	825 West End Avenue Apartment 18 New York, NY 10025

NAME(S) OF CANDIDATE(S)	PUBLIC OFFICER	PLACE(S) OF RESIDENCE
MARGARET S. CHIE	Council Member from the 1st Council District New York County City of New York	3 Riverside Square, Apt. 7H New York, NY 10064

I, the undersigned, do hereby state that I am a duly enrolled voter of the Democratic Party and intend to vote at the next primary election to be held on September 21, 1954. I hereby designate the following named persons to be candidates for the nomination of each party to public office for the election to be held on such date.

NO.	Name of Signer (Signature & Printed Name)	Address	County
1	...	New York, New York	New York
2	...	New York, New York	New York
3	...	New York, New York	New York
4	...	New York, New York	New York
5	...	New York, New York	New York
6	...	New York, New York	New York
7	...	New York, New York	New York
8	...	New York, New York	New York
9	...	New York, New York	New York
10	...	New York, New York	New York
11	...	New York, New York	New York
12	...	New York, New York	New York
13	...	New York, New York	New York
14	...	New York, New York	New York
15	...	New York, New York	New York

STATEMENT OF WITNESS

I, the undersigned, do hereby state that I am a duly enrolled voter of the Democratic Party and intend to vote at the next primary election to be held on September 21, 1954. I hereby designate the following named persons to be candidates for the nomination of each party to public office for the election to be held on such date.

City: New York County: New York

RECORDED 2014-02-01 10:41:02

11272

DEMOCRATIC PARTY DESIGNATING PETITION - NEW YORK COUNTY

To the Board of Elections

The undersigned do hereby state that I am a duly enrolled voter of the Democratic Party and intend to vote at the next general election of such party in the County of New York, in the State of New York, and do hereby designate the following persons for or against the nomination for the office of Public Officer in the election to be held on the date specified.

Table with 3 columns: NAME(S) OF CANDIDATE(S), PUBLIC OFFICER(S), PLACE(S) OF RESIDENCE. Entry: BILL DE BLASIO, Mayor of the City of New York, 442 11th Street Brooklyn, NY 11215

Table with 3 columns: NAME(S) OF CANDIDATE(S), PUBLIC OFFICER(S), PLACE(S) OF RESIDENCE. Entry: DANIEL SQUADRON, Public Advocate of the City of New York, 482 Heavy Street Brooklyn, New York 11221

Table with 3 columns: NAME(S) OF CANDIDATE(S), PUBLIC OFFICER(S), PLACE(S) OF RESIDENCE. Entry: SCOTT H. STRONDER, Comptroller of the City of New York, 154 West 14th Street Apt. 2A New York, New York 10011

Table with 3 columns: NAME(S) OF CANDIDATE(S), PUBLIC OFFICER(S), PLACE(S) OF RESIDENCE. Entry: JULIE L. MEYER, President of the Borough of Manhattan of the City of New York, 124 Madison Street, Apt. 4C New York, NY 10013-2327

Table with 3 columns: NAME(S) OF CANDIDATE(S), PUBLIC OFFICER(S), PLACE(S) OF RESIDENCE. Entry: CYRUS YANCE, JR., District Attorney of New York County, 692 Third End Avenue Apartment 5B New York, NY 10022

Table with 3 columns: NAME(S) OF CANDIDATE(S), PUBLIC OFFICER(S), PLACE(S) OF RESIDENCE. Entry: MARGARET S. CHON, Council Member from the 1st Council District New York County City of New York, 3 Hanover Square, Apt. 7H New York, NY 10004

Table with 3 columns: NAME(S) OF CANDIDATE(S), PARTY POSITION(S), PLACE(S) OF RESIDENCE. Entry: ROBERT F. SCOTT, Former Assembly District Leader from the 13th Assembly District Part C New York County New York State, 345 South End Avenue New York, NY 10022

Table with 3 columns: NAME(S) OF CANDIDATE(S), PARTY POSITION(S), PLACE(S) OF RESIDENCE. Entry: ALICE J. GIBSON, Secretary of the Democratic County Committee from the Western District of the 10th Assembly District New York County New York State, 442 La Grange Place, New York, NY 10013

Table with 3 columns: NAME(S) OF CANDIDATE(S), PARTY POSITION(S), PLACE(S) OF RESIDENCE. Entry: VERNICE M. KAY, Secretary of the County of New York, 50 Commerce Street Apt. 40, New York, NY 10011

Table with 3 columns: No., Name of Signer (Signature Required), Residence, County. Lists 20 signatories with their names and addresses.

STATEMENT OF WITNESS

I, the undersigned, do hereby certify that the foregoing is a true and correct copy of the original as shown to me by the undersigned and that the same has been compared with the original and found to be a true and correct copy of the original.

Signature of Witness: [Blank] City: New York County: New York

NYC 2011-10-4102 BFC X

Exhibit XVIII
New Yorkers for de Blasio
Unreported Joint Expenditures – Palm Card with Andrew King
(see Finding #12b)

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NYCFCB 2014-12-06

787

NEW YORK CITY COUNCIL MEMBER

Andy King

THANK YOU



NOVEMBER 5TH 2013

VOTE DEMOCRATS












				
Bill de Blasio for Mayor	Letitia James for Public Advocate	Scott Stringer for Comptroller	Ruben Diaz Jr. for Borough President	Andy King for City Council

787

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OFFICIAL BALLOT FOR THE GENERAL ELECTION - City of New York - County of Bronx November 5, 2013		
Papeleta Oficial para la Eleccion General Ciudad de Nueva York-Condado de Bronx 5 de Noviembre del 2013 Vea las Instrucciones Adjuntas		
	Democratic	Working Families
Mayor Alcalde	 BILL DE BLASIO <small>Democratic</small>	 BILL DE BLASIO <small>Working Families</small>
Public Advocate Defensor Publico	 LETITIA JAMES <small>Democratic</small>	 LETITIA JAMES <small>Working Families</small>
Comptroller Contralor	 SCOTT M. STRINGER <small>Democratic</small>	 SCOTT M. STRINGER <small>Working Families</small>
Justices of the Supreme Court Jueces de la Corte Suprema		
Judge of the Civil Court-County Juez de la Corte Civil-Condado		
Borough President Presidente del Distrito Municipal	 RUBEN DIAZ JR. <small>Democratic</small>	 RUBEN DIAZ JR. <small>Working Families</small>
Council Member Miembro del Consejo	 ANDY L. KING <small>Democratic</small>	 ANDY L. KING <small>Working Families</small>
Judge of the Civil Court Juez de la Corte Civil	 ARMANDO MONTANO <small>Democratic</small>	

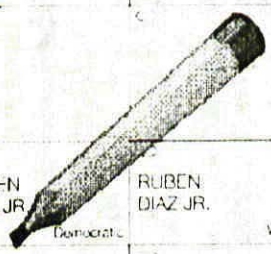


Exhibit XIX
New Yorkers for de Blasio
Non-Campaign Related Expenditures
(see Finding #13)

Name	Statement/ Schedule/ Transaction ID	Purpose Code	Invoice Date	Paid Date	Amount	Notes
Delta Air	2/F/R0018489	OTHER	08/26/10	08/27/10	\$298.70	(1)
American Airlines	4/F/R0010552	OTHER	12/12/11	12/13/11	\$152.70	(1)
The Milford	4/F/R0010568	WAGES	12/23/11	12/23/11	\$1,170.44	(2)
Westin Diplomat Resort	5/F/R0011085	FUNDR	03/03/12	03/05/12	\$331.89	(3)
Enterprise	5/F/R0011282	OTHER	04/13/12	04/16/12	\$321.97	(4)
Days Inn Santa Clara	5/F/R0011285	FUNDR	04/13/12	04/16/12	\$236.52	(4)
ABNY	6/F/R0015829	OTHER	12/08/12	12/10/12	\$95.00	(5)
1800Flowers	6/F/R0015836	OTHER	12/09/12	12/11/12	\$70.75	(6)
Progress Printing Corp	9/F/R0020554	OTHER	05/08/13	05/29/13	\$730.29	(7)
Riggi, Gina	15/F/R0041738	PROFL	11/08/13	11/25/13	\$550.00	(8)
Total					<u>\$3,958.26</u>	

Exhibit XIX
New Yorkers for de Blasio
Non-Campaign Related Expenditures
(see Finding #13)

Notes:

- (1) The Campaign failed to demonstrate how this expenditure was campaign related.
- (2) The Campaign reported this expenditure with the explanation “Housing.” The Campaign failed to provide documentation for this expenditure and explain how it was campaign-related.
- (3) In its Draft Audit Report response, the Campaign stated that his expenditure was for the Candidate to attend a building trades unions conference in Florida. However, the Campaign failed to provide documentation and/or further explanation for how this trip was in furtherance of the Campaign or how it differs from the Candidate's position as Public Advocate at the time.
- (4) The Campaign stated that the Candidate, "Participated in finance prospecting meetings with multiple potential Campaign donors in Silicon Valley." However, the Campaign only reported one contributor in April 2012 from a California resident. The Campaign failed to provide more detail as to how the trip was campaign-related.
- (5) The Campaign reported this expenditure with the explanation, “Dues.” Membership dues are not considered to be in furtherance of a campaign. See Admin. Code § 3-702(21)(b)(7).
- (6) The Campaign reported this expenditure with the explanation, “Other.” Gifts valued at more than \$50.00 are not considered to be in furtherance of a campaign. See Admin. Code § 3-702(21)(b)(10).
- (7) In the Campaign’s Notice of Alleged Violations response, it stated that it paid a \$1,000 deposit to Progress Printing, but provided an invoice showing the expenditure to be \$269.71. The \$730.29 difference (\$1,000 - \$269.71) is considered not in furtherance of the Campaign, as the Campaign should have received a refund for the difference. The Campaign failed to demonstrate that it was refunded by the vendor. This finding has not been included in the penalty calculation as it was identified after the Notice of Alleged Violations and Recommended Penalties was issued.
- (8) The Campaign provided an invoice that indicated that this expenditure was for makeup services for the de Blasio family. Personal grooming is not considered to be in furtherance of a campaign. See Admin. Code § 3-702(21)(b)(3).

Exhibit XX
New Yorkers for de Blasio
Improper Post-Election Expenditures
(see Finding #14)

Name	Statement/ Schedule/ Transaction ID	Purpose Code	Invoice Date	Paid Date	Amount	Notes
Livesteam	16/F/R0042118	PROFL	11/09/13	11/12/13	\$399.00	(1)
Wythe Hotel	15/F/R0041917	OTHER	11/13/13	11/25/13	\$2,226.12	(2)
Brooklyn Bowl	15/F/R0041895	OTHER	11/16/13	11/25/13	\$7,298.75	(3), (7)
Brooklyn Bowl	15/F/R0041919	OTHER	11/19/13	11/25/13	\$7,298.75	(3), (7)
AKPD	15/F/R0041904	PROFL	11/20/13	11/25/13	\$4,750.71	(1), (4)
404	16/F/R0042072	OTHER	11/24/13	12/02/13	\$6,900.00	(3)
404	16/F/R0042074	OTHER	11/24/13	12/02/13	\$16,233.26	(3)
Cafe Metro	16/F/R0042087	OTHER	12/03/13	12/04/13	\$8,398.52	(3)
Metro Funiture	16/F/R0042102	OFFCE	12/04/13	12/04/13	\$1,709.34	(3)
OfficeDesigns.com	16/F/R0042106	OFFCE	12/11/13	12/11/13	\$747.15	
Google	16/F/R0042315	PROFL	01/02/14		\$550.00	
IWANTMYNAME Domain	16/F/R0042420	OFFCE	01/06/14	01/07/14	\$69.00	
AT&T Mobility	BOE	OFFCE	N/A	01/21/14	\$30.00	(5)
Google	BOE	PROFL	N/A	02/04/14	\$550.00	(5)
AT&T Mobility	BOE	OFFCE	N/A	02/19/14	\$30.00	(5)
Google	BOE	PROFL	N/A	03/03/14	\$550.00	(5)
AT&T Mobility	BOE	OFFCE	N/A	03/21/14	\$30.00	(5)
Google	BOE	OFFCE	N/A	04/03/14	\$550.00	(5)
Hilltop Public Solutions	BOE	CONSL	N/A	04/28/14	\$22,500.00	(5), (6)
Google	BOE	OFFCE	N/A	05/05/14	\$536.79	(5)
Godaddy.com	BOE	OFFCE	N/A	06/20/14	\$13.01	(5)
Hilltop Public Solutions	BOE	CONSL	N/A	07/29/14	\$7,500.00	(5), (6)
Apple	BOE	OFFCE	N/A	10/07/14	\$1,577.60	(7)
Hilltop Public Solutions	BOE	CONSL	N/A	10/08/14	\$1,000.00	(5), (6)
Hilltop Public Solutions	BOE	CONSL	N/A	12/12/14	\$1,000.00	(5), (6)
Hilltop Public Solutions	BOE	CONSL	N/A	12/12/14	\$7,500.00	(5), (6)

Exhibit XX
New Yorkers for de Blasio
Improper Post-Election Expenditures
(see Finding #14)

Name	Statement/ Schedule/ Transaction ID	Purpose Code	Invoice Date	Paid Date	Amount	Notes
Hilltop Public Solutions	BOE	PROFL	N/A	03/10/15	\$17,500.00	(5), (6)
Hilltop Public Solutions	BOE	PROFL	N/A	03/18/15	\$7,500.00	(5), (6), (8)
Hilltop Public Solutions	BOE	PROFL	N/A	05/15/15	\$8,500.00	(5), (6)
Hilltop Public Solutions	BOE	PROFL	N/A	06/26/15	\$1,000.00	(5), (6)
Hello World Communications	BOE	PROFL	N/A	06/26/15	\$365.55	(5)
Hilltop Public Solutions	BOE	PROFL	N/A	07/06/15	\$1,000.00	(5), (6)
Hilltop Public Solutions	BOE	PROFL	N/A	07/15/15	\$8,500.00	(5), (6)
Hilltop Public Solutions	BOE	PROFL	N/A	11/20/15	\$21,250.00	(5), (6)
Hilltop Public Solutions	BOE	PROFL	N/A	12/31/15	\$8,500.00	(5), (6)
Hilltop Public Solutions	BOE	CONSL	N/A	02/11/16	\$1,000.00	(5), (6)
Hilltop Public Solutions	BOE	CONSL	N/A	03/17/16	\$1,000.00	(5), (6)
Hilltop Public Solutions	BOE	CONSL	N/A	04/12/16	\$1,000.00	(5), (6)
Total					<u>\$177,063.55</u>	

Notes:

- (1) The Campaign stated that these expenditures are related to a "thank -you" video emailed to campaign supporters and posted on the Campaign website during the post-election period. However, Rule 5-03(e)(2)(ii) only permits expenditures of *nominal cost*. The Campaign already made \$15,350 in post-election expenditures for a "thank you note." Moreover, the Rule only specifies a "mailing" and "notes" to contributors, campaign volunteers, and staff. A video is not considered a note or a mailing and when posted online, the audience is broader than contributors, volunteers, and staff.
- (2) Although this expenditure occurred on November 12, 2013, the night of the Campaign's permissible post-election party, it is considered impermissible because the Campaign failed to explain how the cost of the hotel room rentals directly related to the post-election party, which was held in a different location.

Exhibit XX
New Yorkers for de Blasio
Improper Post-Election Expenditures
(see Finding #14)

- (3) The Campaign had explained that it held a post-election event for campaign staff at Brooklyn Bowl on November 12, 2013. However, documentation from this vendor indicates that there was an additional event, and the Campaign did not provide documentation from the vendor indicating that the expenditures were for the November 12, 2016 event. Rule 5-03(e)(2)(ii) specifies that a Campaign may hold a (meaning one) post-election event for staff, volunteers, and/or supporters within thirty days of the election.
- (4) This transaction totaled \$24,179.71. However, the Campaign demonstrated that \$375.00 was attributable to the Primary election and \$19,054.00 was attributable to the General election. The remainder is an impermissible post-election expenditure.
- (5) This transaction was reported to the New York State Board of Elections.
- (6) In its Draft Audit Report response, the Campaign provided a post-election contract detailing the scope of work for this vendor. The Campaign must provide a more detailed breakdown of the responsibilities, work products, and other services provided by this vendor to justify the large, recurring fees paid by the Campaign to this vendor. The post-election contract stipulated a \$1,500 per month fee for storage of records, which has been deducted from the full monthly fee reported to the Board of Elections. The contract also stipulated a \$1,000 per month facility fee to allow campaign staff to perform post-election work. This fee has been deducted from the full monthly fees reported to the Board of Election for months in which the Campaign also reported paying Sonja Chojnacki, who was the primary staff perform assigned to the post-election audit.
- (7) The Board has taken no further action on this matter other than to make this a part of the Candidate's record with the Board. This transaction is not included in the penalty calculation.
- (8) The Campaign reported this expenditure as \$1,000 to the Board of Elections. However, the Campaign's March 2015 bank statement for account number XXXX6460 indicates that check #1962 (the same check number reported to the BOE for this expenditure) was actually made out for \$10,000.

Exhibit XXI
New Yorkers for de Blasio
Expenditures That Cannot be Allocated to a Particular Committee
(see Finding #17a)

Source	Committee	Payee	Purpose	Date	Amount
NYS BOE	FRIENDS OF BILL DEBLASIO-2009	ADP	OTHER	02/02/10	\$72.50
NYS BOE	FRIENDS OF BILL DEBLASIO-2009	LOWER EASTSIDE DEMOCRATIC CLUB	PROFL	03/15/10	\$500.00
NYS BOE	FRIENDS OF BILL DEBLASIO-2009	THE ODEAN	OTHER	09/10/10	\$57.45
NYS BOE	FRIENDS OF BILL DEBLASIO-2009	THE CUPPING ROOM CAFE	OTHER	10/25/10	\$54.33
NYS BOE	FRIENDS OF BILL DEBLASIO-2009	GODADDY.COM	OTHER	12/03/10	\$4.99
NYS BOE	FRIENDS OF BILL DEBLASIO-2009	CANFIELD, ELLYN	PROFL	01/09/11	\$940.00
NYS BOE	FRIENDS OF BILL DEBLASIO-2009	LEXINGTON DEM CLUB	OTHER	03/17/11	\$225.00
NYS BOE	FRIENDS OF BILL DEBLASIO-2009	ZIPCAR	FUNDR	07/26/11	\$27.22
NYS BOE	FRIENDS OF BILL DEBLASIO-2009	ZIPCAR	OFFCE	08/20/11	\$75.00
NYS BOE	FRIENDS OF BILL DEBLASIO-2009	DEPARTMENT OF FINANCE	OTHER	11/03/11	\$648.53
NYS BOE	FRIENDS OF BILL DEBLASIO-2009	AMERICAN EXPRESS	OTHER	11/08/11	\$675.00
NYS BOE	FRIENDS OF BILL DEBLASIO-2009	GODADDY.COM	OTHER	12/05/11	\$41.74
NYS BOE	FRIENDS OF BILL DEBLASIO-2009	GODADDY.COM	OTHER	12/05/11	\$4.99
Total					<u>\$3,326.75</u>

Notes:

The Campaign did not provide documentation to confirm these expenditures were related to the 2009 campaign from which it was reported, or support the presumption of Rule 1-08(c)(1).

Exhibit XXII
New Yorkers for de Blasio
Commingling – Misdeposited Contributions
(see Finding #17c)

MEMO

TO: NYC Campaign Finance Board

FROM: Ellyn Canfield, New Yorkers for de Blasio

CC: Jisha Dymond

Subject: *Transfer of misdeposited credit card funds*

Date: January 17, 2011

DATE RECEIVED
1/20/11

This memorandum memorializes contributions that were made to Friends of Bill de Blasio 2009 that were inadvertently directed to the NYers for de Blasio bank account.

These funds were misdeposited between September 1, 2010 and Jan 11, 2011. The reason for this error was a mistake made by NGP, the website manager for both Friends of Bill de Blasio 2009 and NYers for de Blasio. NGP also manages the Paypal account that the contributions for both accounts feed into. NGP mistakenly changed which account was receiving funds from contributions made to Friends of Bill de Blasio.

On January 11, 2011, I, Ellyn Canfield, discovered that the funds were missing from the Friends of Bill de Blasio bank account and discovered the funds in the 2013 bank account. I called NGP and they realized the error. Contributions to Friends of Bill de Blasio were then frozen. This mistake was rectified the next business day.

The total of misdeposited funds is \$ 36,030. Contributions are itemized on next page.

These funds were paid to Friends of Bill de Blasio 2009 with check #1066 by NYers for de Blasio on January 11, 2011.

Friends of Bill de Blasio Contributions Misdeposited to NYers for de Blasio

Mailname	Date	Amount	Method
Arthur Aidala	12/13/2010	\$1,000	MasterCard
Barbaralee Spielvogel	12/24/2010	\$1,000	AmericanExpr
Barry Berke	12/20/2010	\$2,500	AmericanExpr
Bruce Ratner	12/23/2010	\$4,950	AmericanExpr
Catherine Giuliani	12/26/2010	\$500	AmericanExpr
Christopher Lehane	01/11/2011	\$1,000	AmericanExpr
Devorah Levi	01/10/2011	\$250	MasterCard
Elizabeth Sackler	12/07/2010	\$2,475	AMEX
Eilyn Canfield	01/11/2011	\$5	Visa
Frank Randazzo	12/17/2010	\$250	Visa
Gail B. Nayowith	12/12/2010	\$1,000	Visa
Gil Cygler	12/13/2010	\$1,000	MasterCard
Isaac M. Sutton	12/23/2010	\$1,000	AmericanExpr
Jacob Elbogen	12/14/2010	\$500	AMEX
Jacob Fetman	12/07/2010	\$500	Visa
James Ross	12/31/2010	\$1,950	AmericanExpr
Jean Weinberg	12/08/2010	\$1,000	Visa
Jim Walden	12/16/2010	\$1,000	AmericanExpr
john watts	01/11/2011	\$1,000	MasterCard
Laurie Perry	12/21/2010	\$950	MasterCard
Marianna Koval	12/13/2010	\$500	AmericanExpr
Marianna Koval	01/11/2011	\$500	AmericanExpr
Moshe Wieder	01/10/2011	\$250	AmericanExpr
Mr. David Manning	12/08/2010	\$500	AmericanExpr
Nihal mehta	12/07/2010	\$500	MasterCard
Ronald Feldman	12/23/2010	\$1,000	AmericanExpr
Sean Andrews	12/06/2010	\$1,000	MasterCard
Shelby Garner	12/10/2010	\$500	MasterCard
Stephanie A. Ingrassia	01/10/2011	\$2,500	Visa
Tondra Lynford	12/08/2010	\$4,950	Visa

DATE RECEIVED
~~1/20/11~~

Exhibit XXIII
New Yorkers for de Blasio
Commingling – November 2011 Bank Statement
(see Finding #17g)

2013 - November



JPMorgan Chase Bank, N.A.
P O Box 659754
San Antonio, TX 78265 - 9754

November 01, 2011 through November 30, 2011

Account Number: [REDACTED]

CUSTOMER SERVICE INFORMATION

Web site: **Chase.com**
Service Center: **1-800-242-7338**
Hearing Impaired: **1-800-242-7383**
Para Espanol: **1-888-622-4273**
International Calls: **1-713-262-1679**



NEW YORKERS FOR DEBLASIO
OPERATING ACCOUNT
320 7TH AVE STE 278
BROOKLYN NY 11215-4194

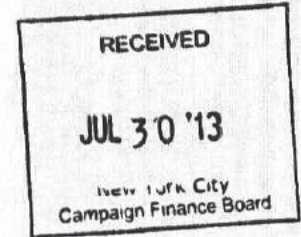


Total = \$40,400

Important information about your Chase Business Checking Account Statements
Starting November 14, 2011, we are making it easier to track your Chase ATM and debit card transactions. On your deposit statement, look for a new section called "ATM and Debit Card Summary" to see all of your ATM and debit card transactions organized by each authorized cardholder.

Please note that any ATM or Debit card transactions that post to your account before November 14, 2011 will not show under this new section. The "ATM and Debit Card Withdrawals" section will not change and will continue to display all of your ATM and debit card transactions in date order.

We value you as a Chase customer. If you have any questions, please call us at 1-800-CHASE38 (1-800-242-7338).



CHECKING SUMMARY

Chase BusinessClassic

	INSTANCES	AMOUNT
Beginning Balance		\$716,962.31
Deposits and Additions	25	76,795.00
Checks Paid	16	- 35,085.88
ATM & Debit Card Withdrawals	19	- 1,704.03
Electronic Withdrawals	10	- 1,524.64
Fees and Other Withdrawals	6	- 2,095.00
Ending Balance	76	\$753,347.76

Your monthly service fee was waived because you maintained an average checking balance of \$7,500 or more during the statement period.

DEPOSITS AND ADDITIONS

DATE	DESCRIPTION	AMOUNT
11/03	Frst Bk Mrch Svc Deposit 374203762884 CCD ID: 9430231490	\$2,110.00
11/04	Deposit	20,175.00
11/07	Merchant Bnkcd Deposit 323576930990 CCD ID: 1113111249	350.00
11/07	Frst Bk Mrch Svc Deposit 374203762884 CCD ID: 9430231490	175.00
11/09	Merchant Bnkcd Deposit 323576930990 CCD ID: 1113111249	700.00
11/14	Frst Bk Mrch Svc Deposit 374203762884 CCD ID: 9430231490	950.00