



New York City Campaign Finance Board

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Rose Gill Hearn
Chair

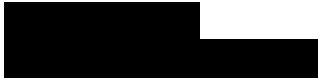
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Via C-Access
October 9, 2015

Lawrence Caruana
Craig Caruana 2013



Dear Lawrence Caruana:

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

The report concludes that the Campaign demonstrated substantial compliance with the Campaign Finance Act (the "Act") and the Board Rules (the "Rules"), with exceptions as detailed in the report.

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. 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,



Jonnathon Kline, CFE
Director of Auditing and Accounting

signature on original

c: Craig Caruana
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Craig Caruana 2013
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Attachments



EC2013 Final Audit Report

Craig Caruana 2013

October 2015

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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 Craig Caruana (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 disclose all of its accounts on the Certification (see Finding #1).
- The Campaign did not report or inaccurately reported financial transactions to the Board (see Finding #2).

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 contributions from a prohibited source (see Finding #3).
- The Campaign did not disclose in-kind contributions received (see Finding #4).

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: Craig Caruana	Contribution Limit:
ID: 1637	\$2,750
Office Sought: City Council	
District: 30	Expenditure Limit:
	2010–2012: \$45,000
Committee Name: Craig Caruana 2013	2013 Primary: N/A
Classification: Participant	2013 General: \$168,000
Certification Date: May 14, 2013	
	Public Funds:
Ballot Status: General	Received: \$92,400
General Election Date: November 5, 2013	Returned: \$10,246
Party: Conservative, Republican	Campaign Finance Summary:
	http://bit.ly/1k8BAIg

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. 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.

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. Complaints resulting in findings are addressed in the body of this report. (*See Finding #3*).

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. After reviewing the Campaign's response(s), CFB staff determined that the total recommended penalties for the Campaign's violations did not exceed \$500, and as a result the staff did not recommend enforcement action to the Board. The Board's determinations are summarized as a part of each Finding in the Audit Results section.

COMPLAINTS

On September 23, 2013, Joseph Buscemi filed a complaint alleging that the Campaign failed to report expenditures related to an article written by the Candidate that appeared in the Juniper Berry, a publication of the Juniper Park Civic Association (“JPCA”).

CFB staff reviewed the article, which promoted the Campaign and made direct appeals for support, and concluded that it was an unreported in-kind contribution by the JPCA, which, as a corporation, may not make such contributions.

In its response, the Campaign stated that it did not realize it was required to account for such activities. At the Campaign’s request, JPCA charged the Campaign as if the article had been an advertisement. The Campaign subsequently paid and reported the expenditure. (*See Finding #4a.*)

On October 10, 2013, the Board dismissed the complaint.

AUDIT RESULTS

Disclosure Findings

1. Bank Accounts – Identifying Information

Campaigns are required to report all bank, depository, and merchant accounts used for campaign purposes on their Filer Registration or Certification. *See* Admin. Code § 3-703(1)(c); Rules 1-11(d), 2-01(a) and 2-06(a).

The documentation provided by the Campaign revealed that information concerning the Campaign's merchant account was not reported to the CFB as part of the candidate's Certification. The Campaign reported receiving credit card contributions, but did not disclose a merchant account, and deposits on the Campaign's bank account statements indicate the source of the funds was Rally Settlements ("Rally").

Previously Provided Recommendation

The Campaign must explain why it failed to disclose the bank account listed above and amend its Certification using a Change of Bank Account Form to include all missing account information.

The form can be downloaded at

http://www.nyccfb.info/PDF/forms/change_of_bank_account.pdf.

Campaign's Response

On April 19, 2013, the Candidate contacted the CFB to confirm that the Campaign's online credit card processor met CFB requirements. CFB staff informed the Campaign that, without further information, contributions accepted through the site would not be eligible for public matching funds.

In response to the Draft Audit Report, the Campaign asserted that its credit card processor, Rally, did not deposit funds into a merchant account as would a traditional credit card processor. Instead, the Campaign withdrew funds directly from the Rally website (www.rally.org) and deposited them into the Campaign's primary checking account, less the merchant fees. The Campaign provided a copy of the transaction record for each contribution processed through Rally; the record details the contributor's name, address, date received, contribution status, amount donated, and the fee charged by the processor.

The Campaign did not amend its Certification with a Change of Bank Account Form.

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.

2. 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
TD Bank	XXXXX3315	Checking	Nov 2012 – Sept 2014

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
Merchant Account Provider ¹	Unknown	Inception – Present

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

¹ The Campaign’s bank statements list deposits from Rally Settlements, which appears to be the Campaign’s merchant account.

c) A review of the Campaign’s merchant account statements revealed the following discrepancy:²

TOTAL REPORTED CREDIT CARD RECEIPTS	TOTAL CREDIT CARD RECEIPTS PER STATEMENTS	DOLLAR VARIANCE	PERCENT VARIANCE
\$1,730.00	\$0.00	\$1,730.00	100%

See also Finding a) above.

Previously Provided Recommendation

- a) The Campaign must provide all pages of the requested bank statements.
- b) For each transaction reported in the Campaign’s disclosure statement(s) that does not appear on the Campaign’s bank statements, the Campaign 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, or amend the Campaign’s disclosure statement to void the check. For each voided check, the Campaign must either issue a replacement check or forgive the expenditure payment. Any forgiven liabilities will be considered in-kind contributions, which could result in contribution limit violations, or be considered contributions from a prohibited source. The Campaign may need to contact the payee to determine why the transaction did not clear.
- c) To resolve the listed discrepancies, the Campaign must compare the credit card receipts reported in its financial disclosure statements to supporting documentation, including merchant account statements, deposit slips, bank statements, and any documentation not previously submitted. The Campaign should ensure it has disclosed all depository and merchant accounts, and provided all statements from inception through present for those accounts. The Campaign should also review documentation to ensure that it correctly characterized the instrument type (i.e., Cash, Credit Card, Check, etc.) of each receipt it reported. The Campaign may need to amend its disclosure statements as a result.

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

² The percentage variance is determined by subtracting the Total Credit Card Receipts per Statements from the Total Reported Credit Card Receipts, and then dividing by the Total Reported Credit Card Receipts. A positive variance indicates that the Total Reported Credit Card Receipts exceeds the Total Credit Card Receipts per Statements. A negative variance indicates that the Total Reported Credit Card Receipts is less than the Total Credit Card Receipts per Statements.

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 16.³

Campaign's Response

a) In response to the Draft Audit Report, the Campaign provided TD Bank statements for account #XXXX3315 from Feb 2014 – Sept 2014.

The Campaign did not provide merchant account statements. The Campaign asserted that its credit card processor, Rally, did not deposit funds into a merchant account as would a traditional credit card processor. Instead, the Campaign withdrew funds directly from the Rally website (www.rally.org) and deposited them into the Campaign's primary checking account, less the merchant fees. The Campaign provided a copy of the transaction record for each contribution processed through Rally; the record details the contributor's name, address, date received, contribution status, amount donated, and the fee charged by the processor. The fees reported by the Campaign calculate to Rally's reported percentage deduction of the contributions per the transaction records. *See Finding #1.*

b) In response to the Draft Audit Report, the Campaign voided Transaction ID 15/F/R0001420 to Mona Salma, for which it had previously provided documentation; the Campaign resolved this transaction. The Campaign did not provide merchant account statements documenting the Rally credit card processing expenses which it reported; therefore, \$100.04 in uncleared expenditure transactions remains unresolved. *See Finding #1.*

c) The Campaign neither provided merchant account statements nor amended its reporting in this respect. *See Finding #1.*

Board Action

a-c) 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

3. 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

³ If the Campaign amends its reporting with the CFB, it must also submit amendments to the New York State Board of Elections.

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).

Prior to the election, the Campaign accepted a contribution from an entity listed on the New York State Department of State’s website as a corporation, partnership, and/or LLC in the following instance. After notification from the CFB, the Campaign refunded the contribution.

PREVIOUSLY REFUNDED CONTRIBUTIONS FROM PROHIBITED SOURCES

NAME	STATEMENT/ SCHEDULE/ TRANSACTION	INCURRED/ RECEIVED/ REFUNDED DATE	AMOUNT	NOTE
Juniper Berry Magazine	13/F/R0000990	09/24/13	\$1,250.00	(1)

(1) This expenditure represents the payment of an unreported in-kind contribution, identified as the result of a September 23, 2013 complaint. Although the Campaign reported the contribution as shown, the documentation provided indicates that this contribution was from Juniper Park Civic Association, Inc.

Previously Provided Recommendation

The Campaign previously refunded this prohibited contribution and no further response is necessary at this time. However, the Campaign may still be penalized for accepting this contribution. 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.

Campaign’s Response

The CFB did not require an additional response, and the Campaign did not submit one.

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.

4. 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) On July 22, 2013, the Candidate contacted the CFB and informed staff that his campaign had been included on a joint petition, which included the campaign of Joseph Lhota and district leaders, for which he did not pay printing expenses. The Campaign was advised that being included on another candidate's petition is an in-kind contribution from that campaign, and that the Campaign would have to document and report its portion of the expenditure. The CFB received a statement from the Lhota campaign that it had included City Council campaigns on its petitions. The Campaign must document its share of the joint petitioning expense(s) and report each transaction as an expenditure or in-kind contribution.

b) The Campaign reported the expenditures listed on Exhibit I. 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. (*See* also Findings #1 and #2b.) 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.

Previously Provided Recommendation

a) The Campaign must provide a written explanation describing how it accounted for the petitioning services provided by the campaign of Joseph Lhota. If the purchase was previously reported, the Campaign must identify the relevant Transaction ID(s) of the purchase. If the Campaign purchased the goods or services listed, it must provide invoices, contracts, and any other documentation related to the purchase. If a third party purchased or donated the good or service, the Campaign must submit an in-kind contribution form completed by the contributor. If not previously reported, the Campaign must enter the bill and bill payment or in-kind contribution in C-SMART and submit an amendment to Statement 16.

b) 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. (See also Findings #1 and #2b.)

Campaign's Response

a) In response to the Draft Audit Report, the Campaign asserted that it did not receive any petition service from the Joseph Lhota campaign. The Campaign did not address the Candidate's previous e-mail to the contrary.

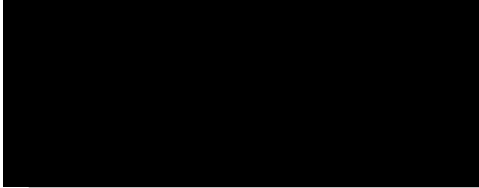
b) In response to the Draft Audit Report, the Campaign did not provide the requested evidence from Rally, such as merchant account statements (see Finding #2a), that demonstrate these transactions cleared the bank. The Campaign provided a transaction record from Rally for each credit card contribution which listed the fee deducted from each donation.

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.

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,



Jonnathon Kline, CFE

Director of Auditing and Accounting

signature on original

Date: October 9, 2015

Staff: Hannah Golden

Sonia M. Simões

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

Candidate: Caruana, Craig N (ID:1637-P)**Office:** 5 (City Council)**Election:** 2013

1. Opening cash balance (All committees)		\$0.00
2. Total itemized monetary contributions (Sch ABC)		\$40,485.00
3. Total unitemized monetary contributions		\$0.00
4. Total in-kind contributions (Sch D)		\$3,939.87
5. Total unitemized in-kind contributions		\$0.00
6. Total other receipts (Sch E - excluding CFB payments)		\$0.00
7. Total unitemized other receipts		\$0.00
8. Total itemized expenditures (Sch F)		\$122,781.76
Expenditure payments	\$122,751.76	
Advance repayments	\$30.00	
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)		\$0.00
Type 1	\$0.00	
Type 2a	\$0.00	
Type 2b	\$0.00	
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)		\$179.06
17. Total receipts adjustment (Sch M - excluding CFB repayments)		\$0.00
18. Total outstanding liabilities (Sch N - last statement submitted)		\$0.00
Outstanding Bills	\$0.00	
Outstanding Advances	\$0.00	
19. Total advanced amount (Sch X)		\$0.00
20. Net public fund payments from CFB		\$82,154.00
Total public funds payment	\$92,400.00	
Total public funds returned	(\$10,246.00)	
21. Total Valid Matchable Claims		\$18,643.00
22. Total Invalid Matchable Claims		\$125.00
23. Total Amount of Penalties Assessed		N/A
24. Total Amount of Penalty Payments		\$0.00
25. Total Amount of Penalties Withheld		\$0.00

Exhibit I
Craig Caruana 2013
Uncleared Transactions
(see DAR Finding #2b)

Name	Check No. / Transaction	Statement/ Schedule/ Transaction	Paid Date	Amount
Rally	Debit	8/F/R0000555	05/09/13	\$ 11.47
Rally	Debit	9/F/R0000589	05/23/13	\$ 27.58
Rally	Debit	9/F/R0000591	05/28/13	\$ 2.87
Rally	Debit	12/F/R0000853	07/15/13	\$ 5.75
Rally	Debit	12/F/R0000854	07/22/13	\$ 5.75
Rally	Debit	12/F/R0000941	08/29/13	\$ 11.48
Rally	Debit	13/F/R0001035	09/26/13	\$ 4.30
Rally	Debit	14/F/R0001057	10/02/13	\$ 2.87
Rally	Debit	15/F/R0001339	11/05/13	\$ 27.97
Total				\$ 100.04