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Via C-Access June 24, 2016

Michelle B. Espinosa Danielle De Stefano for City Council



Dear Michelle Espinosa:

Please find attached the New York City Campaign Finance Board's ("CFB" or "Board") Final Audit Report for the 2013 campaign of Danielle De Stefano (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 August 13, 2015 (attached). 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.

As detailed in the Public Funds notice, the Campaign received a post-election public funds payment of \$400.

The Campaign was required to demonstrate to the CFB that the public funds were used to pay specific outstanding liabilities. The Campaign received a notice that listed the specific outstanding liabilities for which the public funds were able to be used and was given instructions on how to document proper use. *See* 5-01(o). The Campaign responded on October 13, 2015, and the documentation was accepted.

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,



Signature on original

Sauda S. Chapman Director of Auditing and Accounting

c: Danielle M. De Stefano



Danielle De Stefano for City Council



Attachments



Danielle De Stefano for City Council

June 2016

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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 Danielle De Stefano (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, by the due date, a financial disclosure statement required by 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 prohibited sources (see Finding #3).

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 may be eligible for a post-election public funds payment (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: Danielle M. De Stefano Contribution Limit:

ID: 1736 \$2,750

Office Sought: City Council

District: 22 Expenditure Limit: 2010–2012: \$45,000

Committee Name: Danielle De Stefano for City Council 2013 Primary: N/A

Classification: Participant 2013 General: \$168,000

Certification Date: June 07, 2013

Public Funds:
Ballot Status: General Received: \$40,576

General Election Date: November 5, 2013 Returned: \$0
Party: Conservative, Independence

Campaign Finance Summary:

http://bit.ly/1k8IjvJ

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. 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 10% of the dollar amount of its total contributions were in the form of cash contributions, we compared the total cash contributions reported to the total of cash deposits on itemized deposit slips. 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. 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 chose not to recommend enforcement action to the Board. 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.

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	XXXXX6727	Checking	Apr 2013 – Dec 2013

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 did not provide the bank statements listed below:

BANK	ACCOUNT #	STATEMENT PERIOD NOTE
Chase	XXXXX6727	Jan 2014 – June 2014
Piryx	XXXX1KrJ	Inception – Present (1)

- (1) The Campaign previously provided documentation from Piryx, which included a list of 15 contributions and eight outgoing payments to the Campaign's bank account. However, the documentation does not contain the Committee name or an account number. Moreover, the documentation does not contain any indication, such as a date range, that it presents all contributions made to and transfers from the Campaign's Piryx account. The Campaign must provide monthly statements or other documentation from the Campaign's merchant account that contains the Campaign name, account number, total contributions made, total fees deducted, and net transfers to the Campaign's checking account.
- b) The Campaign did not report the transactions listed on Exhibit I that appear on its bank statements.
- c) The Campaign reported the transactions listed on Exhibit II that do not appear on its bank statements.

d) A review of the Campaign's deposit slips revealed the following discrepancy:¹

TOTAL REPORTED	TOTAL CASH PER	DOLLAR	PERCENT
CASH RECEIPTS	DEPOSIT SLIPS	VARIANCE	VARIANCE
\$3,701.00	\$3,856.00	(\$155.00)	-4.19%

e) A review of the Campaign's merchant account statements revealed the following discrepancy:²

TOTAL REPORTED	TOTAL CREDIT CARD	DOLLAR	PERCENT
CREDIT CARD RECEIPTS	RECEIPTS PER STATEMENTS	VARIANCE	VARIANCE
\$1,240.00	\$200.00	\$1,040.00	83.87%

See also Finding #1a above.

Previously Provided Recommendation

- a) The Campaign must provide all pages of the requested bank 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 each transaction reported in the Campaign's disclosure statements 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.

¹ The percentage variance is determined by subtracting the Total Cash Per Deposit Slips from the Total Reported Cash Receipts, and then dividing by the Total Reported Cash Receipts. A positive variance indicates that the Total Reported Cash Receipts exceeds the Total Cash Per Deposit Slips. A negative variance indicates that the Total Reported Cash Receipts is less than the Total Cash Per Deposit Slips.

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.

- d) To resolve the listed discrepancies, the Campaign must compare the cash receipts reported in its financial disclosure statements to supporting documentation, including deposit slips, bank statements, and any documentation not previously submitted. 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.
- e) 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 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.

Campaign's Response

a) In response to the Draft Audit Report, the Campaign provided a letter from Chase Bank stating that the Campaign's account ending in 6727 was closed on July 30, 2014. The Campaign also stated that the account was closed due to no activity and it provided a transaction history report showing that from January 1, 2014 – June 30, 2014, the Campaign had no activity other than the monthly service fee of \$20.00. However, a transaction history report is not an actual bank statement. The Campaign failed to provide bank statements from January 1, 2014 – June 30, 2014.

For the Piryx account, the Campaign explained that Piryx is a credit card processor that does not provide statements. The Campaign provided previously submitted credit card processing documentation. The Campaign's response is inadequate because the Campaign failed to provide documentation from Piryx that includes the Campaign name, account number, total contributions made, total fees deducted, and net transfers to the Campaign's checking account.

b – c) The Campaign did not respond to this finding in its response to the Draft Audit Report.

- d) In response to the Draft Audit Report, the Campaign stated that it was unable to identify the source of the cash variance. The Campaign did not contest this finding in its response to the Notice of Alleged Violations and Recommended Penalties.
- e) In response to the Draft Audit Report, the Campaign stated that it provided, "All possible information available from Piryx contributions" with its response. However, the merchant account receipts cannot be verified without the official statements from the account, therefore the merchant account variance remains unresolved.

Board Action

a - e) 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. Failure to File and Late Filings

Campaigns are required to file disclosure statements on scheduled dates. *See* New York City Charter §1052(a)(8), Admin. Code §§ 3-703(6) and 3-708(8), and Rules 1-09(a) and 3-02.

The Campaign failed to file the following disclosure statements by the due date:

STATEMENT#	DUE DATE	DATE FILED	# DAYS LATE
8	05/15/13	05/16/13	1

Previously Provided Recommendation

The Campaign may explain the lateness of the statement listed above. The Campaign may also provide documentation to support its explanation.

Campaign's Response

In response to the Draft Audit Report, the Campaign stated it had an issue with filing electronically and delivered the backup documentation one day late. The Campaign did not contest this finding with its response to the Notice of Alleged Violations and Recommended Penalties.

Board Action

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.

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 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

		INCURRED/		
	STATEMENT/	RECEIVED/		
	SCHEDULE/	REFUNDED		
Name	TRANSACTION	Date	AMOUNT	Note
Lopatkin, Robert	12/ABC/R0000537	09/12/13	\$200.00	(1)
Lopatkin, Robert	13/M/R0000552	09/20/13	(\$200.00)	

⁽¹⁾ Although the Campaign reported the contribution as shown, the documentation provided indicates that this contribution was from Robert J. Lopatkin, D.D.S., P.C.

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

In response to the Notice of Alleged Violations and Recommended Penalties, the Campaign stated that it immediately refunded the contribution from Robert Lopatkin upon notification from the CFB but also noted that while the check payor was Robert J. Lopaktin DDS, PC, the Campaign knew the corporation as Astoria Family Orthodontics. Although the Campaign refunded the contribution in a timely matter, the Campaign's response is inadequate because it accepted a contribution from a prohibited entity. The check included the designation, "P.C.," so the Campaign should have recognized that the check was from a prohibited source.

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.

Public Matching Funds Findings

4. Potential Post-Election Public Funds Payment

Upon the satisfactory resolution of all issues in this Draft Audit Report, campaigns may qualify for a payment of public funds to pay remaining outstanding liabilities. The payment, if any, will occur only when the CFB issues the final audit report. *See* Rule 5-01(m). Campaigns will then have 60 days after receipt of the final public funds payment to demonstrate that the public funds were properly used to pay reported and documented outstanding liabilities. *See* Rule 5-01(o).

The Detail Payment Report (included in the Draft Audit Report) shows the amount of public funds the Campaign may be eligible to receive. This amount may be adjusted up or down, based on the Campaign's response to this Draft Audit Report and the amount of funds remaining in the Campaign's bank account. Post-election payments are limited to the lesser of the following: unpaid valid claims times the matching factor, documented qualified expenditures in excess of the funds already received, or outstanding liabilities reported in the January 15, 2014 filing with the CFB and documented as still outstanding.

Previously Provided Recommendation

To be eligible for a post-election payment, the Campaign must respond on time to the Draft Audit Report and resolve any compliance issues. In addition, the Campaign must provide documentation demonstrating that the outstanding liabilities reported in its January 15, 2014 disclosure statement are still outstanding. This documentation must show an ongoing attempt by the creditor or vendor to collect the outstanding amount and may include invoices, late notices, or other correspondence. Return a copy of the exhibit with the documentation and indicate which items have already been paid or forgiven. Outstanding liabilities listed on the Exhibit are the only liabilities that may be considered for the purpose of a post-election public funds payment.

The Invalid Matching Claims Report (included in the Draft Audit Report) gives the details of each contribution considered invalid. The left side of the report shows the data reported by the Campaign for each matching claim and the codes that describe why the claim is invalid. The right side provides space for the Campaign's written response and a check box that describes the action the Campaign is taking to address the invalid claim. Return this report with the response to this Draft Audit Report. To supply additional or modified data, correct the appropriate transaction(s) in C-SMART and amend the appropriate disclosure statement(s). For transactions with more than

one invalid code, the Campaign must address all the codes before the CFB will validate the claim. No public funds will be disbursed on invalid claims.

Campaign's Response

In response to the Draft Audit Report, the Campaign provided documentation for its outstanding liabilities.

Board Action

The Campaign received a Post-Election Public Funds Payment of \$400.00 on August 13, 2015.

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: June 24, 2016

Staff: Angel Daniels, CFE

Danielle Willemin, CFE

Exhibit I
Danielle De Stefano for City Council
Unreported Transactions
(see Finding #1b)

Check No./

Payee	Transaction	Paid Date	Amount
Chase	Debit	05/21/13	\$58.00
Stripe	Debit	07/22/13	\$48.25
Chase	Debit	07/31/13	\$20.00
Chase	Debit	08/19/13	\$8.00
Chase	Debit	08/30/13	\$20.00
Chase	Debit	11/29/13	\$20.00
Chase	Debit	12/31/13	\$20.00
Total			<u>\$194.25</u>

Exhibit II
Danielle De Stefano for City Council
Uncleared Transactions
(see Finding #1c)

Check No./

Transaction ID	Payee	Account	Transaction	Paid Date	Amount
R0000161	Piryx Inc	6727	Debit	04/30/13	\$2.88
R0000163	Piryx Inc	6727	Debit	04/30/13	\$14.38
R0000165	Piryx Inc	6727	Debit	04/30/13	\$2.88
R0000167	Piryx Inc	6727	Debit	04/30/13	\$1.44
R0000169	Piryx Inc	6727	Debit	05/03/13	\$2.88
R0000171	Piryx Inc	6727	Debit	05/04/13	\$4.38
R0000173	Piryx Inc	6727	Debit	05/08/13	\$2.88
R0000175	Piryx Inc	6727	Debit	05/09/13	\$2.88
R0000177	Piryx Inc	6727	Debit	05/09/13	\$2.88
R0000746	Piryx Inc	6727	Debit	05/15/13	\$1.15
R0000747	Piryx Inc	6727	Debit	05/15/13	\$14.38
R0000749	Piryx Inc	6727	Debit	05/16/13	\$2.88
R0000751	Piryx Inc	6727	Debit	05/16/13	\$1.15
R0000753	Piryx Inc	6727	Debit	05/22/13	\$1.44
R0000755	Piryx Inc	6727	Debit	06/05/13	\$2.88
Total	•				\$61.36

Total <u>\$61.36</u>

Note

See also Finding #1a.