



New York City Campaign Finance Board

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Via C-Access
September 30, 2016

Emanuel Braxton
The Debi Rose Campaign Committee
1300 Richmond Ave, #23-A
Staten Island, NY 10314

Dear Emanuel Braxton:

Please find attached the New York City Campaign Finance Board's ("CFB" or "Board") Final Audit Report for the 2013 campaign of Deborah Rose (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 October 23, 2015 (attached). The report concludes that the Campaign did not fully demonstrate compliance with the requirements of the Campaign Finance Act (the "Act") and Board Rules (the "Rules").

As detailed in the attached Final Board Determination, the Campaign was assessed penalties totaling \$565.

The full amount owed must be paid no later than **October 31, 2016**. Please send a check in the amount of \$565.00, 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 **October 31, 2016**, 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

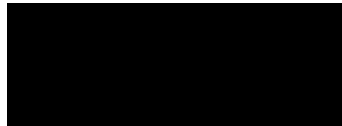
and/or documentation and shows good cause for its previous failure to provide this information or documentation. To submit a petition, please call the Legal Unit at 212-409-1800.

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. 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: Deborah Rose
A black rectangular redaction box covering contact information.

The Debi Rose Campaign Committee
1300 Richmond Ave, #23-A
Staten Island, NY 10314

Attachments



EC2013 Final Audit Report

The Debi Rose Campaign Committee

September 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 Deborah Rose (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 properly disclose advance purchases (see Finding #2).
- The Campaign did not disclose payments made by its vendors to subcontractors (see Finding #3).

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 \$250 doing business contribution limit for the 2013 election cycle which it failed to refund, or refunded after the deadline (see Finding #4).
- The Campaign accepted a contribution from a prohibited source (see Finding #5).
- The Campaign did not document the fair market value of in-kind contributions received (see Finding #6).

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 made post-election expenditures that are not permissible (see Finding #7).

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: Deborah Rose | Contribution Limit: |
| ID: 292 | \$2,750 |
| Office Sought: City Council | |
| District: 49 | Expenditure Limit: |
| | 2010–2012: \$45,000 |
| Committee Name: The Debi Rose Campaign Committee | 2013 Primary: N/A |
| Classification: Participant | 2013 General: \$168,000 |
| Certification Date: June 10, 2013 | |
| | Public Funds: |
| Ballot Status: General | Received: \$92,100 |
| Primary Election Date: N/A | Returned: \$0 |
| General Election Date: November 5, 2013 | |
| Party: Democratic, Working Families Party | Campaign Finance Summary: |
| | http://bit.ly/1yS5VHQ |

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 10, 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.

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 was given the opportunity to respond. The Campaign responded and the CFB evaluated any additional information provided by the Campaign. CFB staff recommended that the Board determine that the Campaign committed violations subject to penalty. The Campaign chose to contest the CFB staff recommendations. The Board's determinations 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.

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 |
|------------------------------|------------|--------------|---------------------|
| Victory State Bank | XXXXXX3564 | Checking | Mar 2011 – Sep 2014 |
| First Bank Merchant Services | XXXXXX2880 | Merchant | Jul 2013 – Jun 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.

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

Previously Provided Recommendation

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.

Campaign’s Response

The Campaign did not address this finding in its response to the Draft Audit Report. In 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, in combination with Finding #2, assessed \$53 in penalties.

2. 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).

The Campaign did not properly report the name of the vendor for the transaction listed in Exhibit II.

Previously Provided Recommendation

For each advance purchase listed, the Campaign must amend its disclosure statements to report the name and address of each vendor from whom the purchase was made.

Campaign's Response

In response to the Draft Audit Report, the Campaign stated that it amended its disclosure statements, deleted an expenditure and added the related advance purchase and advance repayment for that expenditure. The Campaign did not address the advance in Exhibit II. In 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, in combination with Finding #1, assessed \$53 in penalties.

3. 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 a large payment and may have subcontracted a good and/or service. However, the Campaign did not report subcontractors used by this vendor:

| PAYEE | AMOUNT PAID |
|----------|-------------|
| ViaMedia | \$12,500.00 |

Previously Provided Recommendation

The Campaign must contact the vendor, 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 response to the Draft Audit Report, the Campaign stated that it attempted to reach out to ViaMedia, but did not receive a response.

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

4. Prohibited Contributions – Contributions Over The Doing Business Limit

Campaigns may not accept contributions from individuals who have business dealings with the city in excess of the applicable doing business contribution limit for the entire election cycle. *See* Admin. Code §§ 3-703(1-a), (1-b), 3-719(2); Board Rules 1-04 (c)(I), (h). Individuals considered to have business dealings with the city are listed in the "Doing Business Database." Upon notification by the CFB, the Campaign was given 20 days in which to issue a refund to the contributor without a violation or penalty.

The Campaign did not refund contributions within the 20 day deadline in the instance detailed in Exhibit III.

Previously Provided Recommendation

The Campaign did not issue the refund of the over-the-limit amount within the required 20 days of receiving notification from the CFB.

- If the Campaign believes that the contributor was incorrectly included on the notification, the Campaign must provide documentation demonstrating that the contributor is not the individual listed in the Doing Business Database. If the Campaign believes that the contributor was incorrectly included in the Doing Business Database on the date of the contribution, the contributor can apply to be removed from the Database retroactive to the date of the contribution. The CFB does not maintain the Doing Business Database. The contributor and/or entity with which s/he is associated must contact the Mayor's Office of Contract Services—which maintains the Doing Business Database—to request removal, and the Campaign must notify the CFB that the individual has filed for removal. The CFB will rely on the updated Doing Business Database to determine whether the individual was doing business as of the date of the contribution.

Campaign's Response

In response to the Draft Audit Report, the Campaign stated that the untimely refund stemmed from a clerical error. In 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 \$250 in penalties.

5. 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).

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:

| CONTRIBUTIONS FROM PROHIBITED SOURCES | | | | |
|---------------------------------------|--|------------------|----------|------|
| NAME | STATEMENT/ SCHEDULE/ TRANSACTION | RECEIVED DATE | AMOUNT | NOTE |
| Choir Boys Club | 7/ABC/R0002018 | 02/01/13 | \$200.00 | (1) |

(1) Choir Boyz Club Inc. is a registered corporation listed on the New York State Department of State website.

Previously Provided Recommendation

The Campaign must address each transaction individually:

- The Campaign must refund each prohibited contribution by bank or certified check, and provide the CFB with a copy of the refund check, or pay the Public Fund an amount equal to the contribution.
- Alternatively, the Campaign may provide documentation or evidence (such as a copy of the contribution check) showing that the contribution was not from a prohibited entity.

Even if the prohibited contribution is refunded, accepting a prohibited contribution may result in a finding of violation and the assessment of a penalty.

Campaign’s Response

In response to the Draft Audit Report, the Campaign submitted a copy of the certified check issued to Choir Boyz on October 15, 2014. In 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 \$125 in penalties.

6. 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).

Contract for the expenditure listed below indicates that the Campaign received a discount in connection with the goods/services being provided.

| NAME | AMOUNT PER CONTRACT | TOTAL AMOUNT PAID | DISCOUNTED AMOUNT | NOTE |
|--------------------|---------------------|-------------------|-------------------|------|
| Emanuel J. Braxton | \$6,000.00 | \$5,700.00 | \$300.00 | (1) |

(1) The Campaign provided the CFB with a contract for Treasurer, Emanuel J. Braxton, agreeing to a \$500.00 monthly payment for the period of January 1, 2013 through December 31, 2013 (totaling \$6,000.00). The Campaign reported \$5,000.00 in payments to Mr. Braxton, and on January 15, 2014, an additional payment for \$700.00 cleared the Campaign’s bank account. The Campaign did not report an outstanding liability for the remaining \$300.00. As a result, the Campaign’s reporting and documentation indicate that a third party paid for this amount, or that services were provided by Mr. Braxton for free.

Previously Provided Recommendation

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

Campaign’s Response

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

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

7. 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 IV 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.

Campaign's Response

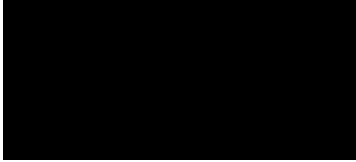
In response to the Draft Audit Report, the Campaign stated that the expenditures were “routine and necessary to wind up [the] campaign.” The Campaign did not provide any corresponding documentation or any further explanation. In response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not address the expenditures listed on Exhibit IV.

Board Action

The Board found the Campaign in violation and assessed \$137 in penalties.

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: September 30, 2016

Staff: Melody Lee

Joel Babb

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

Candidate: Rose, Deborah (ID:292-P)**Office:** 5 (City Council)**Election:** 2013

| | | |
|--|--------------|--------------|
| 1. Opening cash balance (All committees) | | \$0.00 |
| 2. Total itemized monetary contributions (Sch ABC) | | \$93,591.00 |
| 3. Total unitemized monetary contributions | | \$0.00 |
| 4. Total in-kind contributions (Sch D) | | \$433.40 |
| 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) | | \$185,227.65 |
| Expenditure payments | \$182,205.31 | |
| Advance repayments | \$3,022.34 | |
| 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) | | \$1,500.00 |
| 17. Total receipts adjustment (Sch M - excluding CFB repayments) | | \$990.00 |
| 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 | | \$92,100.00 |
| Total public funds payment | \$92,100.00 | |
| Total public funds returned | \$0.00 | |
| 21. Total Valid Matchable Claims | | \$35,626.00 |
| 22. Total Invalid Matchable Claims | | \$11,065.00 |
| 23. Total Amount of Penalties Assessed | | \$565.00 |
| 24. Total Amount of Penalty Payments | | \$0.00 |
| 25. Total Amount of Penalties Withheld | | \$0.00 |

Exhibit I
The Debi Rose Campaign Committee
Unreported Transactions
(see Finding #1)

| Payee | Check No. / Transaction | Date | Amount |
|-------------------------|------------------------------------|-------------|------------------|
| Deposited Item Returned | Debit | 04/04/13 | \$ 500.00 |
| Deposited Item Returned | Debit | 04/11/13 | \$ 50.00 |
| Deposited Item Returned | Debit | 09/04/13 | \$ 30.00 |
| Deposited Item Returned | Debit | 09/04/13 | \$ 32.00 |
| Deposited Item Returned | Debit | 09/04/13 | \$ 100.00 |
| Deposited Item Returned | Debit | 09/10/13 | \$ 30.00 |
| Deposited Item Returned | Debit | 09/10/13 | \$ 32.00 |
| Total | | | \$ 774.00 |

Exhibit II
The Debi Rose Campaign Committee
Transaction Report for Advance Purchases
(see Finding #2)

**New York City Campaign Finance Board
Campaign Finance Information System
Transaction Report for Advance Purchases (P)
Sorted by Name**

Candidate: Rose, Deborah (ID:292-P)

Office: 5 (City Council)

Election: 2013

Advancer Name: Rose, Deborah (ID:1071)

Advancer Address: 30 Macormac Pl. Staten Island, NY 10301

| Vendor Name | Vendor Address | Comm Id | Statement | Reference Number | Purchase Date | Purpose Code | Reason | Instrument Code | Amount |
|--------------------|---|--------------------|------------------|-----------------------------|--------------------------|-------------------------|----------------------|----------------------------|---------------|
| Rose, Deborah | 30 Macormac Pl. Staten Island, NY 10301 | L | 6(01/15/2013) | R0001922 | 09/07/2012 | OTHER | Democratic Nation Co | Credit Card | \$2,000.00 |

Exhibit III
The Debi Rose Campaign Committee
Doing Business Over the Limit - Untimely Refund
(see Finding #4)

| Name | Statement/ Schedule/ Transaction ID | Incurred/ Received/ Refunded Date | Contribution Notice/ Refund Due Date | Amount | Finding |
|------------------|--|--|---|----------------------|----------------|
| Martin, Edwina F | 3/ABC/R0001459 | 03/30/11 | | \$250.00 | |
| Martin, Edwina F | 7/ABC/R0001938 | 02/01/13 | 04/04/13 | \$50.00 | |
| Martin, Edwina F | 14/M/R0002640 | 10/09/13 | 04/24/13 | (\$50.00) | 168 days late |
| | | | Total | \$250.00 | |
| | | | Office Limit | <u>\$250.00</u> | |
| | | | Amount Over the Limit | <u>\$0.00</u> | |

Exhibit IV
The Debi Rose Campaign Committee
Improper Post-Election Expenditures
(see Finding #7)

| Name | Statement/ Schedule/ Transaction ID | Purpose Code | Invoice Date | Paid Date | Amount |
|------------------------------|--|---------------------|---------------------|------------------|------------------------|
| KINGS ARMS DINER | 15/F/R0002902 | OTHER | 11/06/13 | 11/07/13 | \$81.89 |
| PIZZA HOUSE | 15/F/R0002907 | OTHER | 11/22/13 | 11/22/13 | \$108.88 |
| FIRST BANK MERCHANT SERVICES | 16/F/R0002945 | OTHER | 01/03/14 | 01/03/14 | \$59.38 |
| FIRST BANK MERCHANT SERVICES | BOE Reporting | BOE Reporting | Unknown | 02/03/14 | \$74.85 |
| FIRST BANK MERCHANT SERVICES | BOE Reporting | BOE Reporting | Unknown | 03/03/14 | \$74.85 |
| FIRST BANK MERCHANT SERVICES | BOE Reporting | BOE Reporting | Unknown | 04/03/14 | \$74.85 |
| FIRST BANK MERCHANT SERVICES | BOE Reporting | BOE Reporting | Unknown | 05/05/14 | \$74.85 |
| Total | | | | | <u>\$549.55</u> |