



**New York City Campaign Finance Board**

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Rose Gill Hearn  
Chair

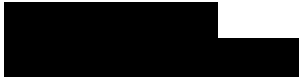
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Via C-Access  
July 18, 2016

Richard Bier  
Meligy 2013



Dear Richard Bier:

Please find attached the New York City Campaign Finance Board's ("CFB" or "Board") Draft Audit Report for the 2013 campaign of Hesham El-Meligy (the "Campaign"). CFB staff prepared the report based on a review of the Campaign's financial disclosure statements and documentation submitted by the Campaign. Based on various factors—including the level of activity reported by the Campaign on its verified disclosure statements and the results of pre-election statement reviews—we performed a limited review.

This report incorporates the Board's final determination of March 17, 2016 (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 \$825.

The full amount owed must be paid no later than **August 17, 2016**. Please send a check in the amount of \$825, 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 **August 17, 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 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](mailto:AuditMail@nyccfb.info) with any questions about the enclosed report.

Sincerely,



Signature on original

Sauda S. Chapman  
Director of Auditing and Accounting

c: Hesham El-Meligy



Meligy 2013



Attachments



# **EC2013 Final Audit Report**

Meligy 2013

July 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 Hesham El-Meligy (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 merchant accounts on the Filer Registration (see Finding #1).
- The Campaign did not report or inaccurately reported financial transactions to the Board (see Finding #2).
- The Campaign did not file, by the due dates, financial disclosure statements required by the Board (see Finding #3).

### ***Other Findings***

- The Campaign did not respond to the Initial Documentation Request (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: Hesham El-Meligy	Contribution Limit:
ID: 1848	\$4,950
Office Sought: Comptroller	
	Expenditure Limit:
Committee Name: Meligy 2013	2010–2012: N/A
Classification: Non-Participant	2013 Primary: N/A
Filer Registration Date: September 26, 2013	2013 General: \$4,018,000
	Public Funds:
Ballot Status: General	Received: N/A
General Election Date: November 5, 2013	Returned: N/A
Party: Libertarian	
	Campaign Finance Summary:
	<a href="http://bit.ly/1yRYPmS">http://bit.ly/1yRYPmS</a>

## 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.

Based on various factors—including the level of activity reported by the Campaign on its verified disclosure statements and the results of pre-election statement reviews—we performed a limited review. Prior to the election, we performed preliminary reviews of the Campaign's compliance with the Act and Rules. 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.

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.

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.

Finally, we determined if the Campaign submitted timely responses to post-election audit requests sent by the CFB.

Following an election, campaigns are not going concerns. Because the activity occurring after the post-election audit is extremely limited, the audit focused on substantive testing of the Campaign's previous activity. 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 asked to respond. The Campaign responded and the CFB evaluated any additional information provided by the Campaign. CFB staff recommended that the Board find that the Campaign committed violations subject to penalty. The Campaign chose to contest the CFB staff recommendations. The Campaign appeared before the Board on March 17, 2016. The Board's actions are summarized as a part of each Finding in the Audit Results section. The finding numbers and exhibit numbers, as well as the number of transactions included in the findings, may have changed from the Draft Audit Report to the Final Audit Report.



## **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 bank statements provided by the Campaign revealed that information concerning a merchant account related to Stripe was not reported to the CFB as part of the candidate's Filer Registration.

#### **Previously Provided Recommendation**

The Campaign must explain why it failed to disclose the merchant account listed above and amend its Filer Registration using a Change of Bank Account Form to include all missing account information. The form can be downloaded at [http://www.nycfb.info/PDF/forms/change\\_of\\_bank\\_account.pdf](http://www.nycfb.info/PDF/forms/change_of_bank_account.pdf). Failure to provide all merchant account statements may result in a finding of a merchant account variance.

#### **Campaign's Response**

In its Draft Audit Report response, the Campaign submitted a narrative explaining that the Candidate was under the assumption that all data regarding its contributions received through its Stripe merchant account automatically uploaded to the CFB. The Campaign failed to provide an updated Change of Bank Account form.

In its Notice of Alleged Violations and Recommended Penalties response, the Campaign states that it is currently unable to report the listed bank account because it is unable to retrieve the account number for this account, but will report the account when it has the number. Although the Campaign did not report any expenditures to FundElevator.com, it states that the firm was its conduit for online fundraising but it went out of business at the beginning of the audit process. The Campaign stated that it is working with Stripe to find its merchant account identifying information, though it did not provide any evidence that it attempted to contact Stripe.

#### **Board Action**

The Board found the Campaign in violation and assessed \$35 in penalties.

## 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 Filer Registration. *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	XXXXXX7811	Checking	Sep 2013 – Feb 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
Stripe	Unknown	Inception – Present
TD Bank	XXXXXX7811	Mar 2014 – Present

b) The Campaign did not report the following transactions that appear on its bank statements:<sup>1</sup>

DEBITS:				
ACCOUNT #	NAME	CHECK No./ TRANSACTION	PAID DATE	AMOUNT
XXXXX7811	TD Bank	Debit	10/28/13	\$35.00
XXXXX7811	TD Bank	Debit	12/31/13	\$25.00
XXXXX7811	Emy Luis Marketin	Debit	01/13/14 <sup>2</sup>	\$600.00
<b>Total</b>				<b>\$660.00</b>

CREDITS:				
ACCOUNT #	NAME	TRANSACTION	RECEIVED DATE	AMOUNT
XXXXX7811	CCD Deposit Stripe Transfer	Deposit	10/07/13	\$110.57
XXXXX7811	CCD Deposit Stripe Transfer	Deposit	10/08/13	\$100.30
XXXXX7811	CCD Deposit Stripe Transfer	Deposit	10/09/13	\$4.50
XXXXX7811	CCD Deposit Stripe Transfer	Deposit	10/15/13	\$4.50
<b>Total</b>				<b>\$219.87</b>

c) The Campaign did not properly report the transaction listed below:

NAME	CHECK No./ TRANSACTION	STATEMENT/ SCHEDULE/ TRANSACTION	PAID DATE	REPORTED AMOUNT	ACTUAL AMOUNT	DIFFERENCE
El-Meligy, Hesham	81366048-0	16/M/R0000070	10/14/13	\$320.00	\$328.00	\$8.00

<sup>1</sup> Deposits appearing on the bank statements provided suggest that the Campaign failed to report credit card contributions. The Campaign must completely and accurately report these contributions. Failure to do so may result in a merchant account variance.

<sup>2</sup> The bank statement shows that the Campaign authorized this expenditures on 01/09/14; therefore it is within the Disclosure Statement #16 reporting period.

d) The Campaign did not provide a copy of the itemized deposit slip listed below:

DATE OF DEPOSIT	DOLLAR AMOUNT
09/23/13	\$320.00

e) A review of the Campaign's deposit slips revealed the following discrepancy:<sup>3</sup>

TOTAL REPORTED CASH RECEIPTS	TOTAL CASH PER DEPOSIT SLIPS	DOLLAR VARIANCE	PERCENT VARIANCE
\$420.00	\$640.00	(\$220.00)	-52.38%

Also, see Finding d) above

f) A comparison of the Campaign's submitted bank statements with information reported in the Campaign's disclosure statements revealed the following overall net discrepancies in reporting:<sup>4</sup>

RECEIPTS:

TOTAL REPORTED MONETARY RECEIPTS <sup>5</sup>	TOTAL CREDITS PER BANK STATEMENTS	DOLLAR VARIANCE	PERCENT VARIANCE
\$4,945.00	\$5,506.21	(\$561.21)	-11.35%

DISBURSEMENTS:

TOTAL REPORTED MONETARY DISBURSEMENTS <sup>6</sup>	TOTAL DEBITS PER BANK STATEMENTS	DOLLAR VARIANCE	PERCENT VARIANCE
\$4,341.79	\$5,034.79	(\$693.00)	-15.96%

<sup>3</sup> 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.

<sup>4</sup> The percentage variance is determined by subtracting the Total Per Bank Statements amount from the Total Reported amount, and then dividing by the Total Reported amount. A positive variance indicates that the Total Reported amount exceeds the Bank Statements amount. A negative variance indicates that the Total Reported amount is less than the Bank Statements amount.

<sup>5</sup> Total Reported Monetary Receipts includes monetary contributions, other receipts, public funds payments, transfers-in, loans, and expenditure refunds.

<sup>6</sup> Total Reported Monetary Disbursements includes bill payments, transfers-out, loan repayments, returns of public funds, and contribution refunds.

## Previously Provided Recommendation

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

The bank statements listed above for TD Bank, account ending in 7811, were not requested in the Draft Audit Report but were identified as a result of the Campaign's response to the Draft Audit Report dated November 13, 2014.

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) This finding was identified as a result of the Campaign's response to the Draft Audit Report dated November 13, 2014.

d) The Campaign must provide copies of all itemized deposit slips.

e) 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.

f) The Campaign must compare information reported on its financial disclosure statements to bank statements and supporting documentation for contributions and expenditures to identify and resolve the listed discrepancies. The Campaign may need to amend its disclosure statements and provide additional bank statements. The individual reporting errors and missing documentation identified in other parts of this finding are the source of some, or all, of the variances cited, and as a result, responses to other parts of this finding will likely affect the cited variances. In responding to other parts of the finding, the Campaign should evaluate whether its response also addresses the overall discrepancies noted above.

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.<sup>7</sup>

### **Campaign's Response**

a) In its Draft Audit Report response, the Campaign submitted a narrative explaining that the Candidate was under the assumption that all data regarding its contributions received through its Stripe merchant account would automatically be reported to the CFB. On September 27, 2013, Mr. El-Meligy contacted the CFB and asked staff about FundElevator.com as a merchant account; he was not told that that merchant would automatically report contributions. The Campaign failed to provide any merchant statements or the listed bank statements for its TD Bank checking account.

In its Notice of Alleged Violations and Recommended Penalties response, the Campaign provided screenshots and data tables from its Stripe account, showing contribution transactions in its Stripe/Fund Elevator account. However, these documents do not suffice as merchant account statements because they do not appear to definitively demonstrate and itemize all transactions in a given month for the merchant account.

- b) In its Draft Audit Report response, the Campaign failed to report the listed transactions.
- c) This finding was identified as a result of the Campaign's response to the Draft Audit Report.
- d) In its Draft Audit Report response, the Campaign provided deposit slips but failed to provide the listed deposit slip.
- e) In its Draft Audit Report response, the Campaign provided several deposit slips that were requested. By providing those deposit slips, the Campaign decreased but did not eliminate the cash variance.

In its Notice of Alleged Violations and Recommended Penalties response, the Campaign states that the source of this variance is "an error of depositing extra cash by the candidate." The Campaign also states that it issued a bank check for \$300, presumably to the Candidate, and that it chose not to cash the check. However, this explanation does not address the substance of this finding, which is the Campaign's incomplete reporting of cash receipts.

f) In its Draft Audit Report response, the Campaign amended its reporting to report several previously unreported transactions. By reporting those transactions, the Campaign decreased but did not eliminate the variance of both receipts and disbursements.

In its Notice of Alleged Violations and Recommended Penalties response, the Campaign states that it does not believe any discrepancy exists; however, the Campaign failed to provide any other explanation or documentation to support this statement.

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<sup>7</sup> If the Campaign amends its reporting with the CFB, it must also submit amendments to the New York State Board of Elections.

### Board Action

- a) The Board found the Campaign in violation and assessed \$71 in penalties.
- 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.
- 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.
- d) The Board has taken no further action on this matter other than to make this a part of the Candidate's record with the Board.
- e) The Board found the Campaign in violation and assessed \$7 in penalties
- f) The Board found the Campaign in violation and assessed \$71 in penalties.

### 3. 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	# DAYS LATE	NOTES
14	10/25/13	Missing	
15	12/02/13	Missing	
16	01/15/14	Missing	(1)

(1) The Campaign filed Disclosure Statement #16 on 03/24/14, 68 days after the due date. However, the CFB penalizes failing to file a disclosure statement by the due date of the following disclosure statement or, in the case of Disclosure Statement #16, within 30 days of the due date as a failure to file.

### Previously Provided Recommendation

The Campaign may explain the failure to file the statements listed above. The Campaign may also provide documentation to support its explanation. The Campaign must file Disclosure Statement #16 with its response.

### Campaign's Response

In its Draft Audit Report response, the Campaign provided a delivery confirmation email from the CFB, acknowledging the Campaign's submission of Disclosure Statement #16 on March 24,

2014. The Campaign also provided a narrative attesting that it submitted its response on that date. However, the CFB considers any submission of Disclosure Statement #16 more than 30 days after the due date as a failure to file. The Campaign did not respond regarding Disclosure Statements #14 and #15.

In its Notice of Alleged Violations and Recommended Penalties response, the Campaign submitted a narrative further describing the circumstances surrounding its late disclosure statements but did not dispute the nature of the finding. However, the Candidate also states that he believes this finding and its associated penalty unfairly punishes his Campaign because of its small size and lack of resources.

### **Board Action**

The Board found the Campaign in violation and assessed \$641 in penalties.

### *Other Findings*

#### **4. Failure to Respond Timely**

Campaigns are required to respond timely to requests from the CFB. *See* Admin. Code § 3-703(1)(d); Rules 1-09, 4-01.

The Campaign failed to submit, by the due date, the following:

REQUEST	DUE DATE	DATE	# DAYS
Initial Documentation Request	02/24/14	03/13/14	17

### **Previously Provided Recommendation**

For the CFB's request listed above, the Campaign may provide a written explanation for the lateness of its response. The explanation must be accompanied by documentation, such as a certified mail receipt, or other relevant documentation regarding its lateness.

### **Campaign's Response**

In its Draft Audit Report response, the Campaign submitted a narrative that the Campaign did not have full time staff, and so the Candidate performed all the necessary work. The narrative also states that the Candidate campaigned while working full time and going through personal hardships. The Campaign did not dispute the nature of this finding.



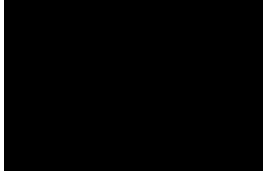
In its Notice of Alleged Violations and Recommended Penalties response, the Campaign submitted a narrative reiterating the circumstances surrounding its late response to the Initial Documentation Request, as well as noting the Candidate's ill health, but did not dispute the nature of the finding. However, the Candidate also states that he believes this finding and its associated penalty unfairly punishes his Campaign because of its small size and lack of resources.

### **Board Action**

The Board found the Campaign in violation, but did not assess a penalty.

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: July 18, 2016

Staff: Hannah Golden

Christopher Cruzcosa, CFE

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

**Candidate:** El-Meligy, Hesham (ID:1848-NP)**Office:** 3 (Comptroller)**Election:** 2013

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1. Opening cash balance (All committees)		\$0.00
2. Total itemized monetary contributions (Sch ABC)		\$4,945.00
3. Total unitemized monetary contributions		\$0.00
4. Total in-kind contributions (Sch D)		\$5,343.30
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)		\$4,021.79
Expenditure payments	\$4,021.79	
Advance repayments	\$0.00	
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)		\$0.00
17. Total receipts adjustment (Sch M - excluding CFB repayments)		\$320.00
18. Total outstanding liabilities (Sch N - last statement submitted)		\$1,200.00
Outstanding Bills	\$1,200.00	
Outstanding Advances	\$0.00	
19. Total advanced amount (Sch X)		\$0.00
20. Net public fund payments from CFB		\$0.00
Total public funds payment	\$0.00	
Total public funds returned	\$0.00	
21. Total Valid Matchable Claims		N/A
22. Total Invalid Matchable Claims		N/A
23. Total Amount of Penalties Assessed		\$825.00
24. Total Amount of Penalty Payments		\$0.00
25. Total Amount of Penalties Withheld		\$0.00