



New York City Campaign Finance Board

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212.409.1800 | www.nycffb.info

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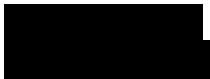
Amy M. Loprest
Executive Director

Sue Ellen Dodell
General Counsel

Via C-Access

June 2, 2015

Dawn P. Martin
Powell 2013



Dear Dawn P. Martin:

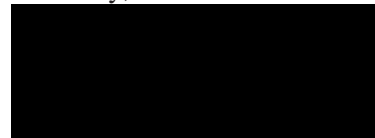
Please find attached the New York City Campaign Finance Board's ("CFB" or "Board") Final Audit Report for the 2013 campaign of Hettie V. Powell (the "Campaign"). CFB staff prepared the report based on a review of the Campaign's financial disclosure statements and documentation submitted by the Campaign.

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

The January 15, 2014 disclosure statement (#16) was the last disclosure statement the Campaign was required to file with the CFB for the 2013 elections. The Campaign is required to maintain its records for six years after the election, and the CFB may require the Campaign to demonstrate ongoing compliance. *See* Rules 3-02(b)(3), 4-01(a), and 4-03. In addition, please contact the New York State Board of Elections for information concerning its filing requirements.

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

Sincerely,



Jonnathon Kline, CFE
Director of Auditing and Accounting
signature on original

c: Hettie V. Powell

[REDACTED]

Powell 2013

[REDACTED]

Attachments



EC2013 Final Audit Report

Powell 2013

June 2015

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RESULTS IN BRIEF

The results of the New York City Campaign Finance Board’s (“CFB” or “Board”) review of the reporting and documentation of the 2013 campaign of Hettie V. Powell (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 a vendor 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 a contribution from a prohibited source (see Finding #4).
- The Campaign did not disclose in-kind contributions received (see Finding #5).

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: Hettie V. Powell	Contribution Limit:
ID: 1491	\$2,750
Office Sought: City Council	
District: 28	Expenditure Limit:
	2010–2012: N/A
Committee Name: Powell 2013	2013 Primary: \$168,000
Classification: Participant	2013 General: N/A
Certification Date: May 20, 2013	
	Public Funds:
Ballot Status: Primary	Received: \$92,400
Primary Election Date: September 10, 2013	Returned: \$2,687
Party: Democratic	

Campaign Finance Summary:

<http://bit.ly/1yS5sp3>

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. Based on various criteria, we also selected the Campaign for an onsite review, and visited the Campaign's location to observe its activity and review its recordkeeping. After the election, we performed an audit of all financial disclosure statements submitted for the election (see summary of activity reported in these statements at Appendix #1).

To verify that the Campaign accurately reported and documented all financial transactions, we requested all of the Campaign's bank statements and reconciled the financial activity on the bank statements to the financial activity reported on the Campaign's disclosure statements. We identified unreported, misreported, and duplicate disbursements, as well as reported disbursements that did not appear on the Campaign's bank statements. We also calculated debit and credit variances by comparing the total reported debits and credits to the total debits and credits amounts appearing on the bank statements. Because the Campaign reported that more than 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.

As part of our reconciliation of reported activity to the bank statements the Campaign provided, we determined whether the Campaign properly disclosed all bank accounts. We also determined if the Campaign filed disclosure statements timely and reported required activity daily during the two weeks before the election. Finally, we reviewed the Campaign's reporting to ensure it disclosed required information related to contribution and expenditure transactions, such as intermediaries and subcontractors.

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

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

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

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

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

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

Following an election, campaigns may only make limited winding up expenditures and are not going concerns. Because the activity occurring after the post-election audit is extremely limited,

the audit focused on substantive testing of the entire universe of past transactions. The results of the substantive testing served to establish the existence and efficacy of internal controls. The CFB also publishes and provides to all campaigns guidance regarding best practices for internal controls.

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

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

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 amendments to reporting made by the Campaign in response. After reviewing the Campaign's response, 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 Board's actions are summarized as a part of each Finding in the Audit Results section.

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	XXXXXX7334	Checking	Mar 2013 – Sep 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 reported duplicate transactions as listed below:

NAME	CHECK NO./ TRANSACTION	STATEMENT/ SCHEDULE/ TRANSACTION	PAID DATE	AMOUNT	DUPLICATE REPORTED AMOUNT	NOTE
ATN Check Cashing	1055	11/F/R0000957	08/08/13	\$155.85		(1)
Powell, Hettie V.	1056	16/F/R0001453	08/08/13		\$155.85	(1)

(1) The Campaign appears to have attempted to correct a misreported transaction, but failed to delete the erroneous transaction.

Previously Provided Recommendation

This finding was identified as a result of the Campaign's response to the Draft Audit Report dated October 28, 2014.

Campaign's Response

In response to the Draft Audit Report, the Campaign filed amendment(s) in an attempt to correct a different finding and created the duplicate transactions cited above. *See* also Finding #2.

Board Action

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

2. 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 and address of the person making the purchase (the advancer) for the transactions indicated in Exhibit I.

Previously Provided Recommendation

For each advancer listed in Exhibit I, the Campaign must amend its disclosure statements to report the name and address of the advancer who made the advance purchases. The Campaign must also submit all documentation related to each advance purchase and advance repayment. The finding numbers and exhibit numbers, as well as the number of transactions included in the finding, may have changed from the Draft Audit Report to the Final Audit Report.

Campaign's Response

In response to the Draft Audit Report, the Campaign stated that it deleted the advance repayments that disclosed the vendor as the advancer and added corrected transactions.

However, the Campaign failed to correctly amend one of the advances. For Transaction ID 10/P/R0000951 the Campaign reported a vendor name of MTA NYC Transit, and an advancer name of MTA NYC Transit. In addition, the Campaign properly reported an advance purchase from Staples, with the advancer name Hettie V. Powell (16/P/R0001452). However, it failed to delete a duplicate of this transaction reported as an advance purchase from Staples, with the advancer name ATN Check Cashing; resulting in a set of duplicate transactions in its reporting (see Finding #1). Therefore, two advances remain misreported.

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.

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 large payments and may have subcontracted goods and services. However, the Campaign did not report subcontractors used by this vendor:

PAYEE	AMOUNT PAID
Berlin Rosen	\$55,483.43

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

The Campaign did not report Westerleigh Concepts as a subcontractor. In response to the Draft Audit Report, the Campaign provided a Subcontractor Disclosure Form from Berlin Rosen Ltd., signed by Alex Navarro-McKay, who affirmed that Westerleigh Concepts subcontracted more than \$5,000.00 for "printing and mailing of campaign literature." The Campaign also provided a letter from Mr. Navarro-McKay stating that the total amount paid to the subcontractor would not be provided, as this information is "confidential and proprietary."

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 – 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				
NAME	STATEMENT/ SCHEDULE/ TRANSACTION	INCURRED/ RECEIVED/ REFUNDED DATE	AMOUNT	NOTE
Giretti, John	8/ABC/R0000222	04/23/13	\$200.00	(1)

(1) Although the Campaign reported the contribution as shown, the documentation provided indicates that this contribution was from Probe International LTD.

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 Draft Audit Report, the Campaign stated that Mr. Giretti no longer had a partner and owned Probe International by himself. The Campaign stated that it had, "inquired if we could accept the check as Mr. Giretti no longer had a partner. We were informed by [our CSU liaison] that we could." However, Probe International, Ltd. is still a registered corporation in New

York per the NYS Department of State Division of Corporations. The Campaign noted that it refunded the contribution as soon as it received notice from the CFB.

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.

5. 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).

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

NAME	STATEMENT/ SCHEDULE/ TRANSACTION	INVOICE DATE	AMOUNT	DISCOUNTED AMOUNT	NOTE
Powell, Hettie V.	8/D/R0000519	04/30/13	\$163.31	\$163.31	(1)

(1) The invoice for this expenditure shows that the Campaign received a 50% discount from Lynn's Creations. *See* Exhibit II.

Previously Provided Recommendation

The Campaign must provide an explanation for the discount noted in the documentation. If the discount is routinely available to the general public or others, the Campaign must provide written confirmation from the vendor. If the discount is not routinely available to others, the Campaign must report the amount of the discount as an in-kind contribution from the vendor. The finding numbers and exhibit numbers may have changed from the Draft Audit Report to the Final Audit Report.

Campaign's Response

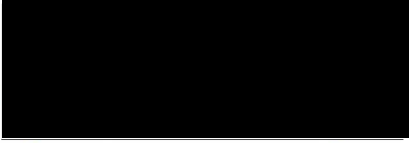
In response to the Draft Audit Report, the Campaign stated that the discount cited is given to all customers who purchase, "a pre-established amount of goods." The Campaign also stated that it requested written confirmation of this policy from the owner; however, the owner refused to provide the confirmation. The Campaign did not provide any documentation supporting its attempt.

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.

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

Respectfully submitted,



Jonnathon Kline, CFE

Director of Auditing and Accounting

signature on original

Date: June 2, 2015

Staff: Selene Muñoz

Danielle Willemin

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

Candidate: Powell, Hettie V (ID:1491-P)**Office:** 5 (City Council)**Election:** 2013

1. Opening cash balance (All committees)		\$0.00
2. Total itemized monetary contributions (Sch ABC)		\$49,871.00
3. Total unitemized monetary contributions		\$0.00
4. Total in-kind contributions (Sch D)		\$1,166.41
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)		\$137,781.26
Expenditure payments	\$134,696.54	
Advance repayments	\$3,084.72	
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)		\$5,000.00
13. Total loan repayments (Sch J)		\$5,000.00
14. Total loans forgiven (Sch K)		\$0.00
15. Total liabilities forgiven (Sch K)		\$0.00
16. Total expenditures refunded (Sch L)		\$172.73
17. Total receipts adjustment (Sch M - excluding CFB repayments)		\$2,000.00
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		\$89,713.00
Total public funds payment	\$92,400.00	
Total public funds returned	(\$2,687.00)	
21. Total Valid Matchable Claims		\$15,919.00
22. Total Invalid Matchable Claims		\$3,920.00
23. Total Amount of Penalties Assessed		N/A
24. Total Amount of Penalty Payments		\$0.00
25. Total Amount of Penalties Withheld		\$0.00

Exhibit I
Powell 2013
Misreported Advances
(see Finding #2)

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

Candidate: Powell, Hettie V (ID:1491-P)

Office: 5 (City Council)

Election: 2013

Advancer Name: ATN CCheck Cashing (ID:953)

Advancer Address: 134-10 Guy R. Brewer Blvd. Jamaica, NY 11434

Vendor Name	Vendor Address	Comm Id	Statement	Reference Number	Purchase Date	Purpose Code	Purpose Reason	Instrument Code	Amount
Staples	80 Sunrise Highway Valley Stream, NY 11582	I	10(08/09/2013)	R0000956	07/14/2013	OTHER	office supplies	Cash	\$155.85
Total:									\$155.85

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

Candidate: Powell, Hettie V (ID:1491-P)

Office: 5 (City Council)

Election: 2013

Advancer Name: MTA NYC Transit (ID:948)

Advancer Address: 2 Broadway New York, NY 10004

Vendor Name	Vendor Address	Comm Id	Statement	Reference Number	Purchase Date	Purpose Code	Purpose Reason	Instrument Code	Amount
MTA NYC Transit	2 Broadway New York, NY 10004	I	10(08/09/2013)	R0000951	07/29/2013	WAGES	canvassing	Cash	\$210.00

Total: \$210.00

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

Candidate: Powell, Hettie V (ID:1491-P)

Office: 5 (City Council)

Election: 2013

Advancer Name: Powell, Hettie V (ID:12)

Advancer Address: 134-15 166 Place Apt.4B Jamaica, NY 11434

Vendor Name	Vendor Address	Comm Id	Statement	Reference Number	Purchase Date	Purpose Code	Purpose Reason	Instrument Code	Amount
ATN Check Cashing	134-10 Guy R. Brewer Blvd. Jamaica, NY 11434	I	16(01/15/2014)	R0001450	08/08/2013	WAGES	campaign workers	Cash	\$210.00
ATN Check Cashing	134-10 Guy R. Brewer Blvd. Jamaica, NY 11434	I	11(08/30/2013)	R0001041	08/12/2013	OTHER	metro cards	Cash	\$360.00
MTA NYC Transit	2 Broadway New York, NY 10004	I	16(01/15/2014)	R0001432	07/16/2013	WAGES	metro cards	Cash	\$340.00
Samaroo, Farouk	86-25 127 Street Richmond Hill, NY 11418	I	10(08/09/2013)	R0000946	07/14/2013	CONSL	Petition challenges	Check	\$750.00
Staples	80 Sunrise Highway Valley Stream, NY 11582	I	16(01/15/2014)	R0001452	07/14/2013	OFFCE	office supplies	Cash	\$155.85
Total:									\$1,815.85

Exhibit II
Powell 2013
Unreported In-Kind Contribution
(see Finding #5)

Lynn's creations & more 0102005

STYLE 1803

646 437-5562

FORM NO. 935

NAME T. Hettie Powell		DATE 4-20-2013	
ADDRESS 917 754 Rochdale NY Dist 28			
SOLD BY	CASH	C. O. D.	CHARGE ON ACCT. 12.03
			MDSE. RETD.
			PAID OUT

QUAN.	DESCRIPTION	PRICE	AMOUNT
100	2 1/4" Buttons Reg Price		3.00
4	your cost 1/2 each		1.50 each
3	Flyer given		150.00
4	with info	79*	13.31
5			
6	Total Due		\$163.31
7	Deposit Cash -		80.00
8	Bal Due in cash		83.31
9	To Delivery by		
10	Thurs 4-25-13		
11	Paid in Full - Bal Due		
12	4-30-13 Lynn's Creations		
13			
14			

CUSTOMER'S ORDER NO.	RECEIVED BY:
----------------------	--------------

519