



**New York City Campaign Finance Board**

100 Church Street, 12<sup>th</sup> Floor, New York, NY 10007  
212.409.1800 | [www.nycffb.info](http://www.nycffb.info)

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Via C-Access  
October 18, 2016

Tom Mustac  
Friends of Joseph Concannon  
154-53 Willets Point Boulevard  
Whitestone, NY 11357

Dear Tom Mustac:

Please find attached the New York City Campaign Finance Board's ("CFB" or "Board") Final Audit Report for the 2013 campaign of Joseph R. Concannon (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 December 17, 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 \$350.00. The Campaign previously paid this amount.

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 CFB appreciates the Campaign's cooperation during the 2013 election cycle. We look forward to receiving a timely response to this report.

Sincerely,

A large black rectangular redaction box covering the signature of Souda S. Chapman.

Signature on original

Souda S. Chapman  
Director of Auditing and Accounting

c: Joseph R. Concannon

A black rectangular redaction box covering contact information for Joseph R. Concannon.

Friends of Joseph Concannon  
154-53 Willets Point Boulevard  
Whitestone, NY 11357



# **EC2013 Final Audit Report**

Friends of Joseph Concannon

October 2016

**Table of Contents**

Table of Contents ..... 2

RESULTS IN BRIEF ..... 3

    Disclosure Findings ..... 3

    Contribution Findings..... 3

    Expenditure Findings..... 3

BACKGROUND ..... 4

SCOPE AND METHODOLOGY ..... 5

AUDIT RESULTS ..... 8

    Disclosure Findings ..... 8

        1. Bank Accounts – Identifying Information ..... 8

        2. Financial Disclosure Reporting - Discrepancies ..... 8

        3. Failure to File and Late Filings .....11

    Contribution Findings.....12

        4. Prohibited Contributions – Corporate/Partnership/LLC .....12

        5. Undocumented or Unreported In-Kind Contributions .....14

    Expenditure Findings.....16

        6. Expenditure Documentation .....16

## **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 Joseph R. Concannon (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 bank 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 date, a financial disclosure statement required by the Board (see Finding #3).

### *Contribution Findings*

All campaigns are required to abide by contribution limits and adhere to the ban on contributions from prohibited sources. 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 document the fair market value and did not disclose in-kind contributions received (see Finding #5).

### *Expenditure Findings*

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 must provide requested documentation for reported expenditures (see Finding #6).

**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: Joseph R. Concannon	Contribution Limit:
ID: 1849	\$2,750
Office Sought: City Council	
District: 23	Expenditure Limit:
	2010–2012: N/A
Committee Name: Friends of Joseph Concannon	2013 Primary: N/A
Classification: Non-Participant	2013 General: N/A
Filer Registration Date: September 9, 2013	
	Public Funds:
Ballot Status: General	Received: N/A
General Election Date: November 5, 2013	Returned: N/A
Party: Reform	

Campaign Finance Summary:

<http://bit.ly/Un11FV>

## 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.

Prior to the election, we performed 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. 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.

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 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 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 December 17, 2015. 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. *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 Rally/Piryx Merchant Account 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.nyccfb.info/PDF/forms/change\\_of\\_bank\\_account.pdf](http://www.nyccfb.info/PDF/forms/change_of_bank_account.pdf).

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

In response to the Draft Audit Report, the Campaign denied that Rally/Piryx is a merchant account and failed to amend its Filer Registration.

In response to the Notice of Alleged Violations and Recommended Penalties, the Campaign submitted a change of bank account form, which lists the Piryx Inc. bank name. The Campaign, failed to disclosure the committee's unique merchant account number.

#### **Board Action**

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

#### **2. Financial Disclosure Reporting - Discrepancies**

Campaigns are required to report every disbursement made, and every contribution, loan, and other receipt received. *See* Admin. Code § 3-703(6); Rule 3-03. In addition, campaigns are required to deposit all receipts into an account listed on the candidate's 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
Chase	XXXXX7104	Checking	Jul 2013 – Jan 2014
Rally/Piryx	Unknown	Merchant	Aug 2013-Nov 2013

Below are the discrepancies and the additional records needed, as identified by a comparison of the records provided and the activity reported by the Campaign on its disclosure statements.

- a) The Campaign did not report the transactions listed on Exhibit I that appear on its bank statement.
- b) The Campaign reported the transactions listed on Exhibit II that do not appear on its bank statements.
- c) The Campaign reported duplicate transactions as listed on Exhibit III.
- d) The Campaign did not properly report the transactions listed below:

NAME	CHECK NO./ TRANSACTION	STATEMENT/ SCHEDULE/ TRANSACTION	PAID DATE	REPORTED AMOUNT	ACTUAL AMOUNT	DIFFERENCE
Piryx	Debit	13/F/R0000534	09/20/13	\$18.00	\$26.21	\$8.21
Piryx	Debit	13/F/R0000788	10/24/13	\$97.71	\$100.59	\$2.88
Piryx	Debit	15/F/R0000908	11/02/13	\$55.13	\$11.25	(\$43.88)

e) A comparison of the Campaign’s submitted bank statements with information reported in the Campaign’s disclosure statements revealed the following overall net discrepancy in reporting:<sup>1</sup>

DISBURSEMENTS:

TOTAL REPORTED MONETARY DISBURSEMENTS <sup>2</sup>	TOTAL DEBITS PER BANK STATEMENTS	DOLLAR VARIANCE	PERCENT VARIANCE
\$40,323.09	\$35,516.43	\$4,806.66	11.92%

<sup>1</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>2</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 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.
- b) For each transaction reported in the Campaign's disclosure statements that does not appear on the Campaign's bank statements, the Campaign must provide evidence to show that the transaction cleared the bank (i.e., a copy of the front and back of the check, and the bank statement showing the payment). Alternatively, the Campaign may provide evidence that the transaction was reported in error, or amend the Campaign's disclosure statement to void the check. For each voided check, the Campaign must either issue a replacement check or forgive the expenditure payment. Any forgiven liabilities will be considered in-kind contributions, which could result in contribution limit violations, or be considered contributions from a prohibited source. The Campaign may need to contact the payee to determine why the transaction did not clear.
- c) For duplicate transactions, the Campaign must delete the duplicate transactions in C-SMART and submit amended disclosure statements. If the transactions are not duplicates, the Campaign must explain why the transactions are not duplicates, and provide supporting documentation. The Campaign may also need to amend its disclosure statements if it did not report transactions accurately.
- d) This finding was identified as a result of the Campaign's response to the Notice of Alleged Violations and Recommended Penalties.
- e) 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 variance cited, and as a result, responses to other parts of this finding will likely affect the cited variance. In responding to other parts of the finding, the Campaign should evaluate whether its response also addresses the overall discrepancy 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>3</sup>

### **Campaign's Response**

- a) The Campaign did not amend its reporting to report the transactions listed on Exhibit I.
- b) In response to the Notice of Alleged Violations and Recommended Penalties, the Campaign provided copies of their bank statements. However, all of the transactions did not appear on the statements provided.
- c) In response to the Draft Audit Report, the Campaign failed to amend its reporting to delete the duplicate transactions. In response to the Notice of Alleged Violations and Recommended Penalties, the Campaign provided additional bank statements. As a result, new duplicate transactions were identified.
- d) This finding was identified as a result of the Campaign's response to the Notice of Alleged Violations and Recommended Penalties.
- e) In response to the Notice of Alleged Violations and Recommended Penalties, the Campaign requested an extension of time to complete a full reconciliation of bank statements. The Campaign was unable to account for the \$4,806.66 dollar variance.

### **Board Action**

- a – d) The Board has taken no further action 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 \$125 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.

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

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

STATEMENT #	DUE DATE	DATE FILED	# DAYS LATE
14	10/25/13	10/30/13	5

### **Previously Provided Recommendation**

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

### **Campaign's Response**

In response to the Draft Audit Report, the Campaign admitted that the lateness of the statement was a result of an oversight due to limited staff. In response to the Notice of Alleged Violations and Recommended Penalties, the Campaign provided email correspondence between itself and its Candidate Services Liaison. The email dated Friday, October 25, 2013 from the Candidate Services Liaison was a reminder that the disclosure statement # 14 was due by midnight. The Campaign responded to the email stating, "I [Tom Mustac] have not been able to get in to the system Fri evening. I will complete the filing by Saturday evening including the resubmission of [Disclosure Statement] #13."

### **Board Action**

The Board found the Campaign in violation and assessed \$100 in penalties.

### ***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).

a) Prior to the election, the Campaign accepted contributions from entities listed on the New York State Department of State's website as corporations, partnerships, and/or LLCs in the instances detailed in Exhibit IV. After notification from the CFB, the Campaign refunded the contributions.

b) 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 instance detailed below:

CONTRIBUTION FROM PROHIBITED SOURCE				
NAME	STATEMENT/ SCHEDULE/ TRANSACTION	RECEIVED DATE	AMOUNT	NOTES
Vinny’s Pit Stop	Unreported	10/25/13	Unknown	(1)(2)

(1) This vendor is incorporated as Pitzies, Inc.

(2) The Candidate’s website described an event held on October 17, 2013 at this location. However, the Campaign did not report any expenditures on or around the event date. *See* also Finding #5.

**Previously Provided Recommendation**

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

b) 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 showing that the contribution was not from a prohibited entity.
- If the prohibited contribution results from an uncleared transaction that has been considered to be an in-kind contribution, the Campaign may provide proof of payment (such as a copy of the front and back of the cancelled expenditure check and/or the associated bank statement showing that the payment was made). If the prohibited source was not paid for the reported expenditure, the Campaign must issue a payment 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 amount of the expenditure.

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

a) In response to the Notice of Alleged Violations and Recommended Penalties, the Campaign stated that the donations "were received as part of the NYS Senate campaign, under which corporate donations are permitted." However, the Campaign was not permitted to transfer corporate donations to its 2013 City Council Campaign.

b) In response to the Notice of Alleged Violations and Recommended Penalties, the Campaign stated that it requested a letter from the vendor, and that it "would forward it shortly upon receipt." The Campaign, however, did not provide a letter from the vendor.

## Board Action

a - b) The Board found the Campaign in violation and assessed \$125 in penalties.

## 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).



Information obtained by the CFB indicates that one or more expenditures were made to advance the election of the Candidate. However, the Campaign did not report the expenditure.

DESCRIPTION OF ITEM	EXHIBIT #	NOTE
10/25/13 Event at Vinny’s Pit Stop	V	(1)(2)

(1) The Candidate’s website described an event held on October 17, 2013 at this location. However, the Campaign did not report any expenditures on or around the event date.

(2) This may also be a prohibited corporate contribution. *See* Admin. Code §§ 3-703(1)(l), 3-719(2)(b); Rule 1-04(e). (*See* also Finding #4b.)

**Previously Provided Recommendation**

The Campaign must provide a written explanation describing the event, and what goods or services were provided. Further, the Campaign must describe how these goods or services were purchased, and who paid for them. If the purchase was previously reported, the Campaign must identify the relevant Transaction ID(s) of the purchase. If the Campaign purchased the goods or services listed, it must provide invoices, contracts, and any other documentation related to the purchase. If a third party purchased or donated the good or service, the Campaign must submit an in-kind contribution form completed by the contributor. If not previously reported, the Campaign must enter the bill and bill payment or in-kind contribution in C-SMART and submit an amendment to Statement 16. In addition, for the Charlie Bullfrog’s event, the Campaign must also provide a list of contributions received at this event, indicating which were collected in connection with the raffle.

**Campaign Response**

In response to the Draft Audit Report, the Campaign stated that they did not have any expenditures at Vinny’s Pit Stop event and that the “candidate was permitted to be at the location and greet customers.” In response to the Notice of Alleged Violations and Recommended Penalties, the Campaign stated that it was seeking documentation from the vendor. However, the Campaign failed to provide documentation.

**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. *See* Finding #4b.

*Expenditure Findings*

**6. Expenditure Documentation**

Campaigns are required to provide copies of checks, bills, or other documentation to verify all transactions reported in their disclosure statements. *See* Admin. Code §§ 3-703(1)(d), (g); Rule 4-01.

The Campaign must provide supporting documentation or an explanation for the reported transaction listed below:

NAME	TRANSACTION TYPE	STATEMENT/ SCHEDULE/ TRANSACTION	INCURRED/RECEIVED/ REFUNDED/PAID DATE	AMOUNT	NOTE
Leadership Institute	Expenditure Refund	13/L/R0000655	09/19/13	\$30.00	(1)

(1) Documentation for this transaction was requested with the Campaign’s Initial Document Request dated December 17, 2013. However, the Campaign did not provide the requested documentation.

**Previously Provided Recommendation**

The Campaign must submit documentation, or explanations as indicated, for each listed transaction.

**Campaign Response**

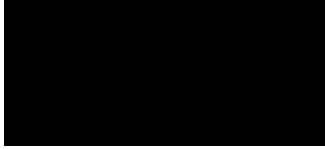
In response to the Draft Audit Report, the Campaign stated “This was a reimbursement to a volunteer that spent \$30 to attend a seminar to aid him in his campaign volunteer activity. It was with the ‘Leadership Institute’ which is a well known for political campaign training.” However, the Campaign did not provide documentation to support its explanation. Additionally, the Campaign did not explain why the expenditure reported was to Leadership Institute instead of the campaign volunteer.

**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,



Signature on original

Sauda S. Chapman

Director of Auditing and Accounting

Date: October 18, 2016

Staff: Melody Lee

Michael Iacono

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

**Candidate:** Concannon, Joseph R (ID:1849-NP)**Office:** 5 (City Council)**Election:** 2013

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1. Opening cash balance (All committees)		\$0.00
2. Total itemized monetary contributions (Sch ABC)		\$29,530.01
3. Total unitemized monetary contributions		\$0.00
4. Total in-kind contributions (Sch D)		\$0.00
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)		\$40,128.09
Expenditure payments	\$39,943.07	
Advance repayments	\$185.02	
9. Total unitemized expenditures		\$0.00
10. Total transfers-In (Sch G)		\$3,431.39
Type 1	\$0.00	
Type 2a	\$0.00	
Type 2b	\$3,431.39	
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)		\$30.00
17. Total receipts adjustment (Sch M - excluding CFB repayments)		\$195.00
18. Total outstanding liabilities (Sch N - last statement submitted)		\$19.95
Outstanding Bills	\$19.95	
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		\$350.00
24. Total Amount of Penalty Payments		\$350.00
25. Total Amount of Penalties Withheld		\$0.00

**Exhibit I**  
**Friends of Joseph Concannon**  
**Unreported Transactions**  
(see Finding #2a)

**Unreported Debits**

Payee	Check No./ Transaction	Date	Amount
Piryx	Debit	07/10/13	\$ 150.00
Unknown	ATM Withdrawal	08/05/13	\$ 20.00
Unknown	ATM Withdrawal	08/05/13	\$ 20.00
Unknown	ATM Withdrawal	08/05/13	\$ 450.00
Unknown	1010	08/15/13	\$ 276.00
Paypal	Debit	08/30/13	\$ 0.23
Unknown	ATM Withdrawal	09/16/13	\$ 200.00
Unknown	ATM Withdrawal	09/16/13	\$ 60.00
Unknown	ATM Withdrawal	09/16/13	\$ 20.00
Facebook	Debit	09/24/13	\$ 26.30
Facebook	Debit	09/25/13	\$ 81.55
Square Inc	Debit	09/25/13	\$ 0.49
Facebook	Debit	09/26/13	\$ 80.16
Square Inc	Debit	09/26/13	\$ 0.49
Facebook	Debit	09/27/13	\$ 85.09
Facebook	Debit	09/27/13	\$ 40.00
Facebook	Debit	09/30/13	\$ 29.94
Linode.com	Debit	10/02/13	\$ 19.95
Chase	Debit	11/29/13	\$ 18.00
Facebook	Debit	12/02/13	\$ 86.97
Google	Debit	12/03/13	\$ 30.00
BJ's Wholesale	Debit	12/03/13	\$ 127.23
Garden City	Debit	12/03/13	\$ 28.21
Bassett Caterers	Debit	12/04/13	\$ 390.86
USPS	Debit	12/04/13	\$ 46.00
Nancy's Fireside Restaurant	Debit	12/09/13	\$ 71.89
Staples	Debit	12/10/13	\$ 55.11
Triple Crown Diner	Debit	12/30/13	\$ 19.85
Queens Village Republican Club	Debit	12/30/13	\$ 100.00
<b>Total</b>			<b>\$ 2,534.32</b>

**Unreported Credits**

Payee	Check No./Transaction	Date	Amount
Leadership Institute	Credit	9/19/2013	\$30.00
<b>Total</b>			<b>\$30.00</b>

**Exhibit II**  
**Friends of Joseph Concannon**  
**Uncleared Transactions**  
 (see Finding #2b)

<b>Transaction ID</b>	<b>Payee</b>	<b>Account</b>	<b>Check No. / Transaction</b>	<b>Date</b>	<b>Amount</b>
R0000659	Saffran 2013	7104	1009	06/20/13	\$ 200.00
R0000875	McDonald's	7104	Debit	09/09/13	\$ 7.61
R0000510	Facebook	7104	Debit	09/23/13	\$ 1.01
R0000870	Beat The Clock Printing	7104	Debit	10/23/13	\$ 131.68
R0000979	Orenstein, Phil	7104	3558729625	10/30/13	\$ 1,500.00
R0000999	Google Services	7104	Debit	12/03/13	\$ 19.95
R0001003	Google Services	7104	Debit	12/03/13	\$ 16.66
R0001001	Dept of Finance - City of NY	7104	Debit	12/03/13	\$ 57.00
R0001006	United Insignia Company	7104	Debit	12/31/13	\$ 931.82
<b>Total</b>					<b>\$2,865.73</b>

**Exhibit III**  
**Friends of Joseph Concannon**  
**Duplicate Transactions**  
(see Finding #2c)

<b>Transaction ID</b>	<b>Payee</b>	<b>Account</b>	<b>Check No. / Transaction</b>	<b>Date</b>	<b>Amount</b>	<b>Duplicate Amount</b>	<b>Notes</b>
R0000514	Staples	7104	Debit	09/23/13	\$10.88	\$0.00	
R0000515	Staples	7104	Debit	09/23/13	\$10.88	\$10.88	
R0000649	Hootsuite Media Inc	7104	Debit	09/29/13	\$49.99	\$49.99	(1)
R0000975	Hootsuite Media Inc	7104	Debit	10/01/13	\$49.99	\$0.00	
R0000857	Graf-X Unlimited	7104	3525228974	10/09/13	\$848.34	\$0.00	
R0000962	Graf-X Unlimited	7104	3558765875	10/09/13	\$848.34	\$848.34	
R0000858	Graf-X Unlimited	7104	3525219964	10/18/13	\$898.35	\$0.00	
R0000966	Graf-X Unlimited	7104	3525219964	10/18/13	\$898.35	\$898.35	
R0000859	Graf-X Unlimited	7104	3546262919	10/22/13	\$275.00	\$0.00	
R0000964	Graf-X Unlimited	7104	3546262919	10/22/13	\$275.00	\$275.00	
R0000861	Graf-X Unlimited	7104	3525220956	10/25/13	\$255.04	\$255.04	(1)
R0000860	Graf-X Unlimited	7104	3525220956	10/25/13	\$643.31	\$643.31	(1)
R0000963	Graf-X Unlimited	7104	3525220956	10/25/13	\$898.35	\$0.00	
R0000872	Beat The Clock Printing	7104	3554017158	10/28/13	\$750.00	\$0.00	
R0000916	Beat The Clock Printing	7104	3554017158	10/28/13	\$750.00	\$750.00	
R0000862	Graf-X Unlimited	7104	3558765875	10/30/13	\$19.96	\$0.00	
R0000965	Graf-X Unlimited	7104	3558765875	10/30/13	\$19.96	\$19.96	
R0000873	Beat The Clock Printing	7104	3583061698	11/12/13	\$692.59	\$0.00	
R0000918	Beat The Clock Printing	7104	3583061698	11/12/13	\$692.59	\$692.59	
<b>Total</b>						<b>\$4,443.46</b>	

**Notes:**

(1) This finding was identified as a result of the Campaign's response to the Notice of Alleged Violations and Recommended Penalties.

**Exhibit IV**  
**Friends of Joseph Concannon**  
**Refunded Corporate Contributions**  
**(see Finding #4a)**

<b>Name</b>	<b>Statement/ Schedule/ Transaction ID</b>	<b>Incurred/ Received/ Refunded Date</b>	<b>Amount</b>
Thomas F. Dalton Funeral Homes	13/G1/R0000748	10/04/12	\$111.39
Webair Internet Dev Co Inc	13/G1/R0000747	10/05/12	\$200.00
Parasol Associate, Inc	13/G1/R0000727	10/26/12	\$50.00



**Exhibit V**  
**Friends of Joseph Concannon**  
**Event at Vinny's Pit Stop**  
**(see Finding #5)**

« All Events

This event has passed.

## KEEP THE NEIGHBORHOOD SAFE EVENT!!

October 25, 2013 @ 7:00 pm - 9:00 pm | \$25



### KEEP THE NEIGHBORHOOD SAFE EVENT!!

**VINNY'S PIT STOP**  
241-21 Braddock Ave,  
Bellerose, NY  
Friday, October 25th  
7pm to 9pm

with Police Captain, NYPD (Ret.)

### Joseph Concannon

-REFORM PARTY LINE-  
City Council Candidate for District 23  
A community event to

"Put the Captain back on the beat for the safety & security of all of New York City"

Come and speak with Joe and see why he is the  
**ONLY** voice we have to save our community!

Open Buffet, Cash Bar  
Suggested Campaign Donation: \$25  
RSVP: Carmen 646-600-4349

WWW.CONCANNON2013.COM  
"Put the Captain back on the beat, in NYC Council District #23"  
SUPPORT YOUR LOCAL POLICE



#### Details

**Start:**  
October 25, 2013 7:00 pm  
**End:**  
October 25, 2013 9:00 pm  
**Cost:**  
25

#### Venue

Vinnys Pit Stop  
241-21 Braddock Ave Bellerose, NY  
United States  
+ Google Map



« PRESS CONFERENCE: De Blasio Tearing Down New York City's Wall of Security

CHILDREN'S FALL FESTIVAL »

