



**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  
May 24, 2016

Andrew M. Wuertele  
People for Lappin

Dear Andrew M. Wuertele:

Please find attached the New York City Campaign Finance Board's ("CFB" or "Board") Final Audit Report for the 2013 campaign of Jessica Lappin (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 September 24, 2015. The report concludes that the Campaign demonstrated substantial compliance with the Campaign Finance Act (the "Act") and the Board Rules (the "Rules"), with exceptions as detailed in the report.

As detailed in the Public Funds notice, the Campaign received a post-election public funds payment of \$8,538.<sup>1</sup>

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@nycffb.info](mailto:AuditMail@nycffb.info) with any questions about the enclosed report.

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<sup>1</sup> The Campaign returned \$1,719.56 on December 10, 2015.

Sincerely,



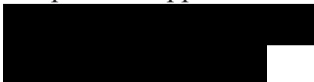
Signature on original

Sauda S. Chapman  
Director of Auditing and Accounting

c: Jessica Lappin



People for Lappin



Attachments



# **EC2013 Final Audit Report**

People for Lappin

May 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 Jessica Lappin (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).

### ***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 did not disclose in-kind contributions received (see Finding #2).
- The Campaign did not provide requested documentation for reported contributions (see Finding #3).

### ***Expenditure Findings***

Campaigns participating in the Campaign Finance Program are required to comply with the spending limit. All campaigns are required to properly disclose and document expenditures and disburse funds in accordance with the Act and Rules. Findings in this section relate to the Campaign’s failure to comply with the Act and Rules related to its spending.

- The Campaign made post-election expenditures that are not permissible (see Finding #4).
- The Campaign did not provide requested documentation for reported expenditures (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: Jessica Lappin	Contribution Limit:
ID: 805	\$3,850
Office Sought: Borough President	
Borough: Manhattan	Expenditure Limit:
	2010–2012: \$135,000
Committee Name: People for Lappin	2013 Primary: \$1,446,000
Classification: Participant	2013 General: N/A
Certification Date: June 5, 2013	
	Public Funds:
Ballot Status: Primary	Received: \$780,864.00
Primary Election Date: September 10, 2013	Returned: \$1,719.56
Party: Democratic	Campaign Finance Summary:
	<a href="http://bit.ly/1yS2p07">http://bit.ly/1yS2p07</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.
3. Disbursed funds in accordance with the Act and Rules.
4. Complied with expenditure limits.
5. Received the correct amount of public funds, or whether additional funds are due to the Campaign or must be returned.

Prior to the election, we performed preliminary reviews of the Campaign's compliance with the Act and Rules. We evaluated the eligibility of each contribution for which the Campaign claimed matching funds, based on the Campaign's reporting and supporting documentation. We also determined the Candidate's eligibility for public funds by ensuring the Candidate was on the ballot for an election, was opposed by another candidate on the ballot, and met the two-part threshold for receiving public funds. In January of 2013, we requested all bank statements to date from the Campaign and reconciled the activity on the statements provided to the Campaign's reporting. We then provided the results of this preliminary bank reconciliation to the Campaign on April 18, 2013. After the election, we performed an audit of all financial disclosure statements submitted for the election (see summary of activity reported in these statements at Appendix #1).

To verify that the Campaign accurately reported and documented all financial transactions, we requested all of the Campaign's bank statements and reconciled the financial activity on the bank statements to the financial activity reported on the Campaign's disclosure statements. We identified unreported, misreported, and duplicate disbursements, as well as reported disbursements that did not appear on the Campaign's bank statements. We also calculated debit and credit variances by comparing the total reported debits and credits to the total debits and credits amounts appearing on the bank statements. Because the Campaign reported that more than 25% of the dollar amount of its total contributions were in the form of credit card contributions—or had a variance between the total credit card contributions reported and the credits on its merchant account statements of more than 4%—we reconciled the transfers on the submitted merchant account statements to the deposits on the bank account statements.

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

disclosed required information related to contribution and expenditure transactions, such as intermediaries and subcontractors.

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

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

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

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

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

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



Following an election, campaigns may only make limited winding up expenditures and are not going concerns. Because the activity occurring after the post-election audit is extremely limited, the audit focused on substantive testing of the entire universe of past transactions. The results of the substantive testing served to establish the existence and efficacy of internal controls. The CFB also publishes and provides to all campaigns guidance regarding best practices for internal controls.

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

In the course of our reviews, we determined that during the 2013 election cycle a programming error affected C-SMART, the application created and maintained by the CFB for campaigns to disclose their activity. Although the error was subsequently fixed, we determined that certain specific data had been inadvertently deleted when campaigns amended their disclosure statements and was not subsequently restored after the error was corrected. We were able to identify these instances and did not cite exceptions that were the result of the missing data or recommend violations to the Board. The possibility exists, however, that we were unable to identify all data deleted as a result of this error.

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

The Campaign was provided with a preliminary draft of this audit report and was asked to provide a response to the findings. The Campaign responded, and the CFB evaluated any additional documentation provided and/or amendments to reporting made by the Campaign in response. The Campaign was subsequently informed of its alleged violations, and was given the opportunity to respond. The Campaign responded and the CFB evaluated any additional information provided by the Campaign. After reviewing the Campaign's response(s), CFB staff established that the total recommended penalties for the Campaign's alleged violations did not exceed \$500, and as a result the staff withdrew its recommendation of enforcement action to the Board. The Board's determinations are summarized as a part of each Finding in the Audit Results section. The finding numbers and exhibit numbers, as well as the number of transactions included in the findings, may have changed from the Draft Audit Report to the Final Audit Report.

**AUDIT RESULTS**

*Disclosure Findings*

**1. Financial Disclosure Reporting - Discrepancies**

Campaigns are required to report every disbursement made, and every contribution, loan, and other receipt received. *See* Admin. Code § 3-703(6); Rule 3-03. In addition, campaigns are required to deposit all receipts into an account listed on the candidate’s Certification. *See* Admin. Code § 3-703(10); Rule 2-06(a). Campaigns are also required to provide the CFB with bank records, including periodic bank statements and deposit slips. *See* Admin. Code §§ 3-703(1)(d), (g); Rules 4-01(a), (b)(1), (f).

The Campaign provided the following bank statements:

BANK	ACCOUNT #	ACCOUNT TYPE	STATEMENT PERIOD
JP Morgan Chase	XXXXXX9315	Checking	Apr 2010 – May 2015
Chase Paymentech	XXXXXX0211	Merchant Account	Jun 2011 – Dec 2013

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

a) The Campaign reported the following transactions that do not appear on its bank statements:

NAME	CHECK NO./ TRANSACTION	STATEMENT/ SCHEDULE/ TRANSACTION	PAID DATE	AMOUNT	NOTE
Time Warner Cable	Debit	12/F/R0006613	09/16/13	\$159.99	
Grace, Terrell	Credit Card	16/M/R0002363	07/11/11	\$25.00	(1)
<b>Total</b>				<b>\$184.99</b>	

(1) See Finding #3

b) The Campaign did not properly report the transactions listed below:

ACCOUNT #	NAME	CHECK No./ TRANSACTION	PAID DATE	REPORTED AMOUNT	ACTUAL AMOUNT	DIFFEREN CE
XXXXX9315	Chase Paymentech	Debit	08/02/13	\$591.11	\$416.11	\$175.00
XXXXX9315	Chase Paymentech	Debit	09/03/13	\$266.72	\$191.72	\$75.00

c) The Campaign did not report the following transactions that appear on its bank statement or documentation provided by the Campaign:

ACCOUNT #	NAME	CHECK No./ TRANSACTION	DATE	AMOUNT
XXXXX9315	06/18/11 WITHDRAWAL	WITHDRAWAL	06/20/11	\$500.00

**Previously Provided Recommendation**

a) For each transaction reported in the Campaign’s disclosure statement(s) 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.

b) For inaccurately reported transactions, the Campaign must amend its disclosure statements to accurately report the transactions.

c) This finding was identified as a result of the Campaign’s response to the Draft Audit Report dated November 24, 2014.

**Campaign’s Response**

a) The Campaign did not respond to this finding.

b) The Campaign failed to correct the two misreported transactions listed.

c) This finding was identified as a result of the Campaign's response to the Draft Audit Report dated November 24, 2014.

### **Board Action**

a - 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.

### ***Contribution Findings***

## **2. 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).

The Campaign reported the following expenditure. However, the reported payment for the expenditure is not present on any of the bank statements provided by the Campaign, nor is it reported as an outstanding liability. As a result, the Campaign's reporting and documentation indicate that a third party paid for this transaction, or that the goods or services were provided by the reported payee for free.

NAME	REPORTED CHECK NO./ TRANSACTION	STATEMENT/ SCHEDULE/ TRANSACTION	PAID DATE	AMOUNT
Time Warner Cable	Debit	12/F/R0006613	09/16/13	\$159.99

**Previously Provided Recommendation**

This finding was identified as a result of the Campaign’s response to the Draft Audit Report dated November 24, 2014.

**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. Undocumented Transactions**

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); and Rule 4-01.

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

NAME	TRANSACTION TYPE	STATEMENT/ SCHEDULE/ TRANSACTION	INCURRED/RECEIVED/ REFUNDED/PAID DATE	AMOUNT	NOTE
Grace, Terrell	Contribution Refund	3/M/R0002363	07/11/11	\$25.00	(1)

(1) The Campaign provided a merchant email receipt for this contribution refund; however the receipt does not include details about the refund, such as the last four digits of the contributor credit card that was credited.

**Previously Provided Recommendation**

The Campaign must submit documentation for the transaction listed above.

**Campaign’s Response**

In response to the Draft Audit Report, the Campaign submitted documentation of the refund made to Terrell Grace, but the documentation does not show the last four digits of the credit card that was credited.

## **Board Action**

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

### *Expenditure Findings*

#### **4. Expenditures – Improper Post-Election**

After the election, campaigns may only make disbursements for the preceding election, or for limited, routine activities of nominal cost associated with winding up a campaign and responding to the post-election audit. Campaigns have the burden of demonstrating that post-election expenditures were for the preceding election or the limited and routine activities described in the law. *See* Admin. Code § 3-710(2)(c); Rule 5-03(e)(2).

Each expenditure listed on Exhibit I is an improper post-election expenditure due to the timing, amount and/or purpose reported by the Campaign or identified from a review of Campaign bank statements and/or documentation.

#### **Previously Provided Recommendation**

The Campaign must explain how each expenditure was for the preceding election, or was a routine and nominal expenditure associated with winding up the Campaign, and must provide supporting documentation. Expenditures that are not proper post-election expenditures may increase the amount of public funds that must be repaid.

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

In response to the Draft Audit Report and the Notice of Alleged Violations and Recommended Penalties, the Campaign stated that for the U-Haul transaction, it was unable to obtain further documentation and for the Godaddy transaction, it was unable to determine the reason for the charge. Regarding the Best Buy, Myfax, Bluehost and Intuit transactions, the Campaign stated that these were for anti-viral, fax, website URL and payroll services (respectively) that were used during the post-election period on an on-going basis.

## **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.

**5. 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
Foa & Son Corporation	Expenditure Refund	16/L/R0006737	12/18/13	\$2,609.76
Foa & Son Corporation	Expenditure Refund	16/L/R0006738	12/18/13	\$525.00

**Previously Provided Recommendation**

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

**Campaign’s Response**

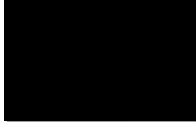
In response to Draft Audit Report, the Campaign addressed its two expenditure refunds from Foa & Son Corporation by submitting two policy cancellation statements and a refund check for \$3,134.76 representing the total of the two amounts reported above. However, the statement for Transaction ID R0006737 states a return amount of \$2,495.00. The Campaign did not provide documentation for the difference of \$114.00.

**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: May 24, 2016

Staff: Melody Lee

Joel Babb



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

**Candidate:** Lappin, Jessica S (ID:805-P)**Office:** 4 (Boro President)**Election:** 2013

1. Opening cash balance (All committees)		\$0.00
2. Total itemized monetary contributions (Sch ABC)		\$816,355.01
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)		\$1,559,281.90
Expenditure payments	\$1,553,623.65	
Advance repayments	\$5,658.25	
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)		\$3,879.63
17. Total receipts adjustment (Sch M - excluding CFB repayments)		\$29,455.00
18. Total outstanding liabilities (Sch N - last statement submitted)		\$11,663.68
Outstanding Bills	\$11,663.68	
Outstanding Advances	\$0.00	
19. Total advanced amount (Sch X)		\$0.00
20. Net public fund payments from CFB		\$779,145.00
Total public funds payment	\$780,864.00	
Total public funds returned	(\$1,719.00)	
21. Total Valid Matchable Claims		\$136,929.00
22. Total Invalid Matchable Claims		\$1,025.00
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**  
**People for Lappin**  
**Improper Post-Election Expenditures**  
**(see Finding #3)**

**Exhibit 1**  
**People for Lappin**  
**Improper Post-Election Expenditures**  
**(see Finding #3)**

<b>Name</b>	<b>Statement/ Schedule/ Transaction ID</b>	<b>Purpose Code</b>	<b>Invoice Date</b>	<b>Paid Date</b>	<b>Amount</b>	<b>Notes</b>
U-Haul Moving And Storage	16/F/R0006667	OTHER	09/23/13	09/23/13	\$130.00	(1)
Best Buy	16/F/R0006716	OFFCE	11/03/13	11/04/13	\$54.43	
Myfax	16/F/R0006730	OFFCE	11/30/13	12/02/13	\$10.00	
Godaddy.Com, Inc.	16/F/R0006757	OTHER	12/25/13	12/26/13	\$21.58	
Myfax	16/F/R0006736	OFFCE	12/30/13	12/30/13	\$10.00	
Intuit, Inc.	BOE	PROFL	N/A	01/30/14	\$42.46	
Bluehost Inc.	BOE	OTHER	N/A	02/20/14	\$14.99	
Bluehost Inc.	BOE	OTHER	N/A	02/21/14	\$14.99	
Bluehost Inc.	BOE	OTHER	N/A	02/24/14	\$14.99	
Intuit, Inc.	BOE	PROFL	N/A	03/03/14	\$42.46	
Intuit, Inc.	BOE	PROFL	N/A	03/11/14	\$16.32	
Intuit, Inc.	BOE	PROFL	N/A	03/31/14	\$42.46	
Intuit, Inc.	BOE	PROFL	N/A	04/29/14	\$42.46	
<b>Total</b>					<b><u>\$457.14</u></b>	

**Notes:**

- (1) The narrative provided by the Campaign states that this expenditure was for a parking ticket, but the Campaign did not provide documentation to substantiate this claim.