



New York City Campaign Finance Board

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Via C-Access
June 16, 2015

Nan Beer
New Yorkers for Robert Jackson



Dear Nan Beer:

Please find attached the New York City Campaign Finance Board's ("CFB" or "Board") Final Audit Report for the 2013 campaign of Robert Jackson (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 May 14, 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 \$525.

The full amount owed must be paid no later than **July 16, 2015**. Please send a check in the amount of \$525, payable to the "New York City Election Campaign Finance Fund," to: New York City Campaign Finance Board, 100 Church Street, 12th Floor, New York, NY 10007.

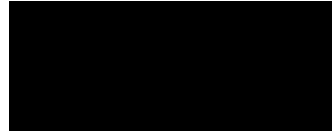
If the CFB is not in receipt of the full amount owed by **July 16, 2015**, the Candidate's name and the amount owed will be posted on the CFB's website. The CFB may also initiate a civil action to compel payment. In addition, the Candidate will not be eligible to receive public funds for any future election until the full amount is paid. Further information regarding liability for this debt can be found in the attached Final Board Determination.

The January 15, 2014 disclosure statement (#16) was the last disclosure statement the Campaign was required to file with the CFB for the 2013 elections. The Campaign is required to maintain its records for six years after the election, and the CFB may require the Campaign to demonstrate

ongoing compliance. *See* Rules 3-02(b)(3), 4-01(a), and 4-03. In addition, please contact the New York State Board of Elections for information concerning its filing requirements.

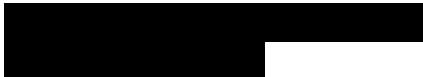
The CFB appreciates the Campaign's cooperation during the 2013 election cycle. Please contact the Audit Unit at 212-409-1800 or AuditMail@nyccfb.info with any questions about the enclosed report.

Sincerely,

A large black rectangular redaction box covering the signature of Jonnathon Kline.

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

c: Robert Jackson

A black rectangular redaction box covering contact information for Robert Jackson.

New Yorkers for Robert Jackson

A black rectangular redaction box covering contact information for New Yorkers for Robert Jackson.

Attachments



EC2013 Final Audit Report

New Yorkers for Robert Jackson

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 Robert Jackson (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 file the required daily disclosure statements during the two weeks preceding the 2013 primary election (see Finding #1).
- The Campaign did not disclose payments made by its vendors to subcontractors (see Finding #2).

Contribution Findings

All campaigns are required to abide by contribution limits and adhere to the ban on contributions from prohibited sources. Further, campaigns are required to properly disclose and document all contributions. Findings in this section relate to the Campaign's failure to comply with the requirements for contributions under the Act and Rules.

- The Campaign accepted aggregate contributions exceeding the \$320 doing business contribution limit for the 2013 election cycle which it refunded after the deadline (see Finding #3).
- The Campaign accepted contributions from prohibited sources (see Finding #4).
- The Campaign accepted a contribution from an unregistered political committee (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: Robert Jackson	Contribution Limit:
ID: 484	\$3,850
Office Sought: Borough President	
Borough: Manhattan	Expenditure Limit:
	2010–2012: \$135,000
Committee Name: New Yorkers for Robert Jackson	2013 Primary: \$1,446,000
Classification: Participant	2013 General: N/A
Certification Date: June 6, 2013	
	Public Funds:
Ballot Status: Primary	Received: \$795,300
Primary Election Date: September 10, 2013	Returned: \$10,439.03
Party: Democratic	
	Campaign Finance Summary:
	http://bit.ly/1yRZDb6

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 19, 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.

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

The Campaign was provided with a preliminary draft of this audit report and was asked to provide a response to the findings. The Campaign responded, and the CFB evaluated any additional documentation provided and/or amendments to reporting made by the Campaign in response. The Campaign was subsequently informed of its alleged violations, and was asked to respond. The Campaign responded and the CFB evaluated any additional information provided by the Campaign. CFB staff recommended that the Board determine that the Campaign committed violations subject to penalty. The Campaign did not contest the CFB staff recommendations. The Board's actions are summarized as a part of each Finding in the Audit Results section.

AUDIT RESULTS

Disclosure Findings

1. Daily Pre-Election Disclosure – Statements of Contributions/Expenditures

During the 14 days preceding an election, if a candidate: (1) accepts a loan, contribution, or contributions from a single source in excess of \$1,000; or (2) makes aggregate expenditures to a single vendor in excess of \$20,000, the candidate shall report such contributions, loans, and expenditures to the Board in a disclosure, received by the Board within 24 hours of the reportable transaction. *See* Rule 3-02(e). This includes additional payments of any amount to vendors who have received aggregate payments in excess of \$20,000 during the 14-day pre-election period. These contributions and expenditures must also be reported in the Campaign's next disclosure statement.

The Campaign did not file the required daily disclosure to report the following transaction:

EXPENDITURE:				
NAME	STATEMENT/ SCHEDULE/ TRANSACTION	DATE INCURRED	AMOUNT	NOTE
The Advance Group (TAG)	16/F/R0007866	09/05/13	\$1,820.55	(1)

(1) The disclosure was filed after the election, which is considered a failure to file. In aggregate, the Campaign incurred \$360,847.31 in expenditures to The Advance Group in the 14 days prior to the primary election.

Previously Provided Recommendation

If the Campaign believes it filed the required daily disclosure timely, as part of its response it must submit the C-SMART disclosure statement confirmation email as proof of the submission. The Campaign may provide an explanation if it believes that its failure to file the daily disclosure is not a violation, but it cannot file daily pre-election disclosures now.

Campaign's Response

In response to the Draft Audit Report, the Campaign explained that the unreported transaction above was due to the vendor not providing an invoice in a timely manner. The Campaign provided emails dated September 5, 2013 demonstrating that the vendor failed to inform the Campaign of the outstanding bill, and an email dated September 12, 2013 demonstrating that it received multiple invoices from the vendor on that date.

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 – 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 vendors 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
The Advance Group (TAG)	\$821,417.32

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 vendor.

Campaign's Response

The Campaign has not provided a complete Subcontractor Form from the listed vendor. However, in response to the Draft Audit Report the Campaign provided documentation demonstrating its attempts to obtain a Subcontractor Form from the vendor.

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

3. Prohibited Contributions – Contributions Over The Doing Business Limit

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

The Campaign did not refund a contribution within the 20 day deadline in the instance detailed in Exhibit I.

Previously Provided Recommendation

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

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

Campaign’s Response

The Campaign submitted a narrative explaining the sequence of events leading up to the refund of this contribution, but did not dispute the details of this finding.

Board Action

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

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 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 II. After notification from the CFB, the Campaign refunded the contributions.

Previously Provided Recommendation

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 each contribution was not a violation.

Campaign's Response

In response to the Draft Audit Report, the Campaign submitted a narrative stating that it continues to question the corporate nature of the listed contributors.

Board Action

The Board found the Campaign in violation and assessed \$400 in penalties.

5. Prohibited Contributions – Unregistered Political Committees

Participating campaigns may not, either directly or by transfer, accept any contribution, loan, guarantee, or other security for a loan from any political committee, unless it is registered with the CFB, or registers within ten days of receipt of the contribution. *See* Admin. Code §§ 3-703(1)(k), 3-707; Rule 1-04(d).

A list of registered political committees can be viewed on the CFB's website, www.nyccfb.info. Political committees are often required to register with governmental agencies other than the CFB; however, registering with those agencies does not register them with the CFB.

Prior to the election, the Campaign accepted a contribution from an unregistered political committee in the instance detailed in Exhibit III. After notification from the CFB, the Campaign refunded the contribution.

Previously Provided Recommendation

The Campaign previously resolved 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

The Campaign submitted a narrative describing the acceptance and refund of this contribution but did not dispute the nature of the finding.

Board Action

The Board found the Campaign in violation and assessed \$125 in penalties.

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

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Jonnathon Kline". The signature is fluid and cursive, with the first name being more prominent than the last.

Jonnathon Kline, CFE

Director of Auditing and Accounting

Date: June 16, 2015

Staff: Hannah Golden

Christopher Cruzcosa, CFE

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

Candidate: Jackson, Robert (ID:484-P)**Office:** 4 (Boro President)**Election:** 2013

1. Opening cash balance (All committees)		\$0.00
2. Total itemized monetary contributions (Sch ABC)		\$482,050.00
3. Total unitemized monetary contributions		\$0.00
4. Total in-kind contributions (Sch D)		\$13,076.28
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)		\$1,245,084.63
Expenditure payments	\$1,231,458.85	
Advance repayments	\$13,625.78	
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)		\$618.66
17. Total receipts adjustment (Sch M - excluding CFB repayments)		\$21,950.00
18. Total outstanding liabilities (Sch N - last statement submitted)		\$678.88
Outstanding Bills	\$678.88	
Outstanding Advances	\$0.00	
19. Total advanced amount (Sch X)		\$0.00
20. Net public fund payments from CFB		\$784,861.00
Total public funds payment	\$795,300.00	
Total public funds returned	(\$10,439.00)	
21. Total Valid Matchable Claims		\$135,684.00
22. Total Invalid Matchable Claims		\$13,258.00
23. Total Amount of Penalties Assessed		\$525.00
24. Total Amount of Penalty Payments		\$0.00
25. Total Amount of Penalties Withheld		\$0.00

Exhibit I
New Yorkers for Robert Jackson
Doing Business Over the Limit - Untimely Refund
 (see Finding #3)

<u>Name</u>	<u>Statement/ Schedule/ Transaction ID</u>	<u>Incurred/ Received/ Refunded Date</u>	<u>Contribution Notice/ Refund Due Date</u>	<u>Amount</u>	<u>Finding</u>	<u>Notes</u>
Priest Rose, Sandra	4/ABC/R0001587	08/02/11	02/03/12	\$1,000.00		
Priest Rose, Sandra	5/M/R0001730	02/24/12	02/23/12	(\$680.00)	1 day late	(1)
			Total	\$320.00		
			Office Limit	<u>\$320.00</u>		
			Amount Over the Limit	<u>\$0.00</u>		

Notes:

(1) The Campaign reported a 02/17/12 refund but per documentation, the refund was issued 02/24/12.

Exhibit II
New Yorkers for Robert Jackson
Previously Refunded Corporate Contributions
(See Finding #4)

Name	Statement/ Schedule/ Transaction ID	Incurred/ Received/ Refunded Date	Contribution Notice/ Refund Due Date	Amount	Notes
Gordon, Richard	6/ABC/R0004091	12/17/12	02/20/13	\$250.00	(1)
Gordon, Richard	7/M/R0005357	03/06/13	03/06/13	(\$250.00)	
Law Offices of Philip Kuszel	6/ABC/R0004003	12/17/12	02/20/13	\$250.00	(2)
Law Offices of Philip Kuszel	7/M/R0005356	03/06/13	03/06/13	(\$250.00)	
Faze Electrical Contracting	6/ABC/R0004630	01/09/13	02/20/13	\$100.00	(3)
Faze Electrical Contracting	10/M/R0006734	07/22/13	03/06/13	(\$100.00)	

Notes:

- (1) Although the Campaign reported the contribution as shown, the documentation provided indicates that this contribution was from Richard Gordon, C.P.A., P.C. The refund of this contribution was prompt.
- (2) Although the Campaign reported the contribution as shown, the documentation provided indicates that this contribution was from Law Offices of Philip Kuszel, P.C. The refund of this contribution was prompt.
- (3) Although the Campaign reported the contribution as shown, the documentation provided indicates that this contribution was from Faze Electrical Contracting, Inc. The refund of this contribution was not prompt.

Exhibit III
New Yorkers for Robert Jackson
Refunded Contributions From Unregistered Political Committees
 (see Finding #4)

Name	Statement/ Schedule/ Transaction ID	Incurred/ Received/ Refunded Date	Contribution Notice/ Refund Due Date	Amount	Notes
Friends of Lewis Fidler	4/ABC/R0001594	08/02/11	04/16/12	\$250.00	
Friends of Lewis Fidler	12/M/R0007920	09/06/13	05/16/12	(\$250.00)	(1)

Notes:

(1) The Campaign reported a 09/06/13 refund but per documentation, the refund was issued 05/16/12.