



New York City Campaign Finance Board

100 Church Street, 12th Floor, New York, NY 10007
212.409.1800 | www.nycffb.info

Rose Gill Hearn
Chair

Art Chang
Richard J. Davis
Mark S. Piazza
Naomi B. Zauderer
Members

Amy M. Loprest
Executive Director

Sue Ellen Dodell
General Counsel

Via C-Access
May 6, 2016

Deena Venezia
Friends of Todd Dobrin



Dear Deena Venezia:


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

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

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

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

Sincerely,

A black rectangular redaction box covering the signature of the sender.

signature on original

Sauda S. Chapman
Director of Auditing and Accounting

c: Todd Dobrin

A black rectangular redaction box covering contact information for Todd Dobrin.

Friends of Todd Dobrin

A black rectangular redaction box covering contact information for Friends of Todd Dobrin.

Attachments



EC2013 Final Audit Report

Friends of Todd Dobrin

May 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. Failure to File and Late Filings 8

 2. Disclosure – Possible Subcontractors 8

 Contribution Findings..... 9

 3. Prohibited Contributions – Unregistered Political Committees 9

 4. Undocumented or Unreported In-Kind Contributions10

 Expenditure Findings.....12

 5. Candidate Personal Contributions12

 6. Expenditures – Improper Post-Election13

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 Todd Dobrin (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, by the due date, a financial disclosure statement required by the Board (see Finding #1).
- The Campaign must 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 a contribution from an unregistered political committee (see Finding #3).
- The Campaign did not document the fair market value of in-kind contributions received and did not disclose in-kind contributions received (see Finding #4).

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 did not report personal contributions to non-candidate political committees made by the candidate that are attributable to the Campaign (see Finding #5).
- The Campaign made post-election expenditures that are not permissible (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: Todd Dobrin	Contribution Limit:
ID: 1093	\$2,750
Office Sought: City Council	
District: 47	Expenditure Limit:
	2010–2012: \$45,000
Committee Name: Friends of Todd Dobrin	2013 Primary: \$168,000
Classification: Participant	2013 General: N/A
Certification Date: May 31, 2013	
	Public Funds:
Ballot Status: Primary	Received: \$92,400.00
Primary Election Date: September 10, 2013	Returned: \$3,633.70
Party: Democratic	Campaign Finance Summary:
	http://bit.ly/1yRYGzR

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.

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 asked 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 determined that the total recommended penalties for the Campaign's violations did not exceed \$500, and as a result the staff chose not to recommend enforcement action to the Board. The Board's actions are summarized as a part of each Finding in the Audit Results section. 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. Failure to File and Late Filings

Campaigns are required to file disclosure statements on scheduled dates. *See* New York City Charter §1052(a)(8), Admin. Code §§ 3-703(6) and 3-708(8), and Rules 1-09(a) and 3-02.

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

STATEMENT #	DUE DATE	DATE FILED	# DAYS LATE
10	08/09/13	08/10/13	1

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 explained that the submission was late due to traveling to assist a sick family member.

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

PAYEE	AMOUNT PAID
Berlin Rosen	\$67,932.81

Previously Provided Recommendation

The Campaign must contact the vendors, who must verify whether subcontractors were used. The Campaign may provide the vendor with a copy of the Subcontractor Form (available on the CFB website at http://www.nyccfb.info/PDF/forms/subcontractor_disclosure_form.pdf) for this purpose, and submit the completed form with the Campaign’s response. In addition, if subcontractors were used and paid more than \$5,000, the Campaign must amend its disclosure statements to report subcontractor information. If the vendor does not complete the Subcontractor Form, the Campaign should submit documentation of its attempts to obtain this information, including copies of certified mail receipts and the letters sent to the vendors.

Campaign’s Response

In response to the Draft Audit Report, the Campaign provided a signed subcontractor form from Berlin Rosen. Berlin Rosen stated that it received more than \$5,000 in goods and services from two vendors: Westerleigh Concepts and Perception Imaging. However, it declined to disclose exact amounts. Subsequently, the Campaign was unable to report the subcontractors.

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 – 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 unregistered political committees in the following instance. After notification from the CFB, the Campaign refunded the contribution.

CONTRIBUTION FROM AN UNREGISTERED POLITICAL COMMITTEES
WHOSE CONTRIBUTION WAS REFUNDED

NAME	STATEMENT/ SCHEDULE/ TRANSACTION	RECEIVED DATE	AMOUNT	NOTE
Your Vote Counts	8/ABC/R0001414	05/08/13	\$500.00	(1)

(1) Your Vote Counts registered with the CFB on June 3, 2013.

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

In response to the Draft Audit Report, the Campaign did not dispute this finding. It stated that the Candidate delivered the refund check to Your Vote Counts on June 11, 2013.

In its response to the Notice of Alleged Violations, the Campaign stated that it immediately refunded this contribution from Your Vote Counts upon notification from the CFB and did not intend to willfully ignore any administrative codes or Board rules, but rather made a mistake. However, the Campaign had a responsibility to verify that a political committee was registered with the CFB, via the list on the CFB website which is updated daily, before accepting this contribution.

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.

4. 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, but failed to adequately document, the following in-kind contribution. Due to the lack of documentation, the fair market value and the source of the in-kind contribution could not be substantiated.

NAME	STATEMENT/ SCHEDULE/ TRANSACTION	RECEIVED DATE	AMOUNT
Mason Tenders District Council	16/D/R0001918	10/01/13	\$305.96

Previously Provided Recommendation

The Campaign must provide supporting documentation for each in-kind contribution listed. Supporting documentation may include, but is not limited to, invoices, appraisals, and estimates of the fair market value. Documentation must include the name and address of the contributor, provide a detailed description of the goods/services, and explain the cost basis for valuing each in-kind contribution from the reported contributor. If the documentation is from a vendor that the contributor paid, the Campaign must also provide evidence that the reported contributor paid the vendor, e.g., a copy of the cancelled check, or a signed statement from the contributor verifying that she or he made the payment for the in-kind contribution. If the Campaign cannot document the fair market value, the Campaign must explain why it cannot provide adequate documentation.

Campaign’s Response

In response to the Draft Audit Report, the Campaign provided a letter signed by the Director of the Mason Tenders District Council PAC stating that they made an in-kind contribution for Get Out The Vote (“GOTV”) efforts. However, the letter, dated September 19, 2013, did not provide a detailed description of the service provided or how it calculated its value of services provided.

In its response to the Notice of Alleged Violations, The Campaign provided a letter addressed to the Mason Tenders District Council requesting that the political committee send the Campaign documentation of the fair market value of its in-kind contribution. Additionally, the Campaign submitted a copy of the certified mail receipt accompanying this letter and the receipt of tracking from the United States Postal Service dated June 8, 2015.

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

5. Candidate Personal Contributions

Campaigns are required to report the candidate's personal contributions of \$99 or more to political committees that support candidates in New York City and throughout New York State (except political committees of other candidates). Such contributions are presumptively campaign expenditures, unless the candidate rebuts the presumption. *See* CFB Final Determination No. 2009-1. Such contributions are also considered contributions by the candidate to the campaign, and count toward the candidate's contribution limit.

Contributions reported to the New York State Board of Elections and the Federal Election Commission by the recipients indicate that the Candidate made contributions that the Campaign should have reported as Candidate Personal Contributions. *See* Exhibit I.

Previously Provided Recommendation

If the Campaign believes that it is not required to disclose the contributions listed on Exhibit I, it must provide an explanation and supporting documentation to demonstrate that:

- The Candidate has a prior personal relationship with the recipient political committee as described in CFB Final Determination No. 2009-1.
- The Candidate has a lengthy history of contributing to the entity at a similar or greater financial level.
- The transaction was a purchase of a good or service rather than a contribution.

If the Campaign cannot provide evidence of any of the scenarios listed above, it must enter the contributions listed on Exhibit I in C-SMART as Candidate Personal Contributions and submit amendments to its disclosure statements to report the transactions.

Campaign’s Response

In response to Draft Audit Report, the Campaign contended that the \$100 transaction on March 29, 2012, was not a contribution, but rather payment for a dinner dance and that event personnel instructed the candidate to make the check payable to Your Vote Counts.

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.

6. 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 below is an improper post-election expenditure due to the timing, amount and/or purpose reported by the Campaign.

PAYEE	STATEMENT/ SCHEDULE/ TRANSACTION	PURPOSE CODE	INVOICE DATE	DATE PAID	AMOUNT	NOTE
Sun & Kun LLC	8/F/R0001401	OTHER	04/30/13	04/30/13	\$2,000.00	
Verizon	16/F/R0001922	OFFCE	11/18/13	11/18/13	\$123.71	
Constant Contact	16/F/R0001928	OTHER	12/02/13	12/02/13	\$38.11	
Sun & Kun LLC	N/A	OFFCE	N/A	06/11/14	\$100.00	(1)

(1) This expenditure was reported to the New York State Board of Election for the July 2014 Periodic Report as \$700 representing utility fees for the seven month lease term (\$100 per month) of May 2013 through November 2013. The November 2013 fee for utilities of \$100 is considered an improper post-election expenditure.

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, the Campaign provided its lease agreement with Sun & Kun LLC. The April 30, 2013 payment to this vendor appears to be a security deposit, as noted on the Campaign's check. The period covered in the terms of the lease is from May through November 30, 2013, (7 months) at \$2,000 per month. However, campaign activity did not continue after the September 10, 2013, primary election. The Campaign did not report a return of the \$2,000 security deposit; instead, it appears that the deposit was applied to the Campaign's November 2013 rent, which is after the period allowed for reasonable winding-up expenditures related to the primary election.

In response to the Notice of Alleged Violations, the Campaign provided a letter from its landlord, Sun & Kun LLC, stating that the seventh-month lease term is the shortest term the landlord, Jin Ho Kim, would allow any tenant. The letter, dated June 6, 2015, also confirmed that the \$2,000 security deposit was used for the last month's rent, as agreed to by the Campaign.

Additionally, the Campaign reported a \$700 expenditure to Sun & Kun, LLC, to the New York State Board of Elections (NYS BOE) on June 11, 2014. The Campaign's rental agreement with Sun & Kun, LLC required the Campaign to make utility payments.

In response to the Notice of Alleged Violations, the Campaign provided a bill from Con Edison for service to its Campaign office from May 23, 2013 through April 24, 2014, totaling \$1,271.78. The Campaign also provided a cancelled check from Sun & Kun, LLC in that amount to Con Edison and a letter from its landlord, Jin Ho Kim of Sun & Kun, LLC, stating that it had approximated the Campaign's use of electricity. The landlord explained that he determined the Campaign incurred pro-rata utility expenses of \$100 per month. The landlord stated that he billed the Campaign \$700 for seven months of utility payments per their seven month lease. Since the \$100 payment for November 2013 was after the winding up period, that amount is considered an improper post-election expenditure.

Lastly, in response to the Notice of Alleged Violations, the Campaign asserted that the payments of the Verizon and Constant Contact invoices were for nominal costs associated with winding up the election. However, the Campaign provided a Verizon bill which accounted for service from October 28, 2013 to November 27, 2013. The Campaign's final invoice with Constant Contact covered November 30, 2013 to December 29, 2013. The Campaign failed to provide adequate documentation or explanation for why it needed phone service and access to email marketing software for the months after the election. The Campaign stated that it could not have known about these bills prior to receiving them. However, the Campaign was aware that it had contracted for services from these vendors, as evidenced by prior monthly payments to them.

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 6, 2016

Staff: Hannah Golden

Sonia M. Simões

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

Candidate: Dobrin, Todd A (ID:1093-P)**Office:** 5 (City Council)**Election:** 2013

1. Opening cash balance (All committees)		\$26,382.46
2. Total itemized monetary contributions (Sch ABC)		\$99,055.80
3. Total unitemized monetary contributions		\$0.00
4. Total in-kind contributions (Sch D)		\$305.96
5. Total unitemized in-kind contributions		\$0.00
6. Total other receipts (Sch E - excluding CFB payments)		\$0.08
7. Total unitemized other receipts		\$0.00
8. Total itemized expenditures (Sch F)		\$178,209.43
Expenditure payments	\$178,011.13	
Advance repayments	\$198.30	
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)		\$612.04
17. Total receipts adjustment (Sch M - excluding CFB repayments)		\$3,860.00
18. Total outstanding liabilities (Sch N - last statement submitted)		\$0.00
Outstanding Bills	\$0.00	
Outstanding Advances	\$0.00	
19. Total advanced amount (Sch X)		\$0.00
20. Net public fund payments from CFB		\$88,767.00
Total public funds payment	\$92,400.00	
Total public funds returned	(\$3,633.00)	
21. Total Valid Matchable Claims		\$24,979.00
22. Total Invalid Matchable Claims		\$150.00
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
Friends of Todd Dobrin
Unreported Candidate Personal Contributions
(see Finding #5)

Payee	Source	Date	Amount	
Your Vote Counts	BOE	03/29/12	\$	100.00
Total			\$	100.00