



**New York City Campaign Finance Board**  
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Via C-Access  
 September 30, 2016

Rasul Miller  
 Zead Ramadan 2013  
 132 Edgecombe Avenue, #3R  
 New York, NY 10030

Dear Rasul Miller:

Please find attached the New York City Campaign Finance Board’s (“CFB” or “Board”) Final Audit Report for the 2013 campaign of Zead Ramadan (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 October 23, 2015 (attached). As detailed in the report, the Campaign failed to demonstrate compliance with the Campaign Finance Act (the “Act”) and the Board Rules (the “Rules”).

As detailed in the attached Final Board Determination, the Campaign must repay the following:

CATEGORY	AMOUNT
Public Funds Repayment	\$13,899
Penalties Assessed	\$97,448
<b>Total Owed</b>	<b>\$111,347</b>

The full amount owed must be paid no later than **October 31, 2016**. Please send a check in the amount of \$111,347 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 **October 31, 2016**, the Candidate’s name and the amount owed will be posted on the CFB’s website. The CFB may also initiate a civil

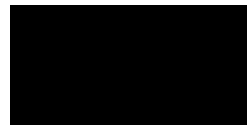
action to compel payment. In addition, the Candidate will not be eligible to receive public funds for any future election until the full amount is paid. Further information regarding liability for this debt can be found in the attached Final Board Determination.

The Campaign may challenge a public funds determination in a petition for Board reconsideration within thirty days of the date of the Final Audit Report as set forth in Board Rule 5-02(a). However, the Board will not consider the petition unless the Campaign submits new information and/or documentation and shows good cause for its previous failure to provide this information or documentation. To submit a petition, please call the Legal Unit at 212-409-1800.

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

Sincerely,



Signature on Original

Sauda S. Chapman  
Director of Auditing and Accounting

c: Zead Ramadan



Zead Ramadan 2013  
132 Edgecombe Avenue, #3R  
New York, NY 10030

Attachments



# **EC2013 Final Audit Report**

Zead Ramadan 2013

September 2016

**Table of Contents**

Table of Contents ..... 2

RESULTS IN BRIEF ..... 3

    Disclosure Findings ..... 3

    Contribution Findings..... 3

    Expenditure Findings..... 3

    Public Matching Funds Findings ..... 4

    Other Findings ..... 4

BACKGROUND ..... 5

SCOPE AND METHODOLOGY ..... 6

OTHER MATTERS .....10

AUDIT RESULTS .....11

    Disclosure Findings .....11

        1. Financial Disclosure Reporting – Discrepancies.....11

        2. Failure to File and Late Filings .....15

        3. Disclosure – Advances .....15

        4. Disclosure – Possible Subcontractors .....17

    Contribution Findings.....18

        5. Prohibited Contributions – Corporate/Partnership/LLC .....18

        6. Prohibited Contributions – Unregistered Political Committees .....19

        7. Undocumented or Unreported In-Kind Contributions .....20

    Expenditure Findings.....23

        8. Cash Disbursements Exceeding \$100 and Petty Cash Exceeding \$500.....23

        9. Expenditures – Not In Furtherance of the Campaign.....24

        10. Expenditure Documentation .....26

        11. Expenditures – Exceeding the Legal Limit .....27

    Public Matching Funds Findings .....28

        12. Qualified Expenditure Documentation.....28

    Other Findings .....30

        13. Failure to Respond Timely.....30

## 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 Zead Ramadan (the "Campaign") indicate findings of non-compliance with the Campaign Finance Act (the "Act") and Board Rules (the "Rules") as detailed below:

### *Disclosure Findings*

Accurate public disclosure is an important part of the CFB's mission. Findings in this section relate to the Campaign's failure to completely and timely disclose the Campaign's financial activity.

- The Campaign did not report or inaccurately reported financial transactions to the Board (see Finding #1).
- The Campaign did not file, by the due dates, financial disclosure statements required by the Board (see Finding #2).
- The Campaign did not properly disclose advance purchases (see Finding #3).
- The Campaign did not disclose payments made by its vendors to subcontractors (see Finding #4).

### *Contribution Findings*

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

- The Campaign accepted a contribution from a prohibited source (see Finding #5).
- The Campaign accepted contributions from unregistered political committee (see Finding #6).
- The Campaign did not document the fair market value of in-kind contributions received and did not disclose in-kind contributions received (see Finding #7).

### *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 cash disbursements greater than \$100 and/or the Campaign maintained a petty cash fund greater than \$500 (see Finding #8).
- The Campaign made expenditures that were not in furtherance of the Campaign (see Finding #9).
- The Campaign must provide requested documentation related to reported expenditures (see Finding #10).
- The Campaign exceeded the \$168,000 expenditure limit for the primary election (see Finding #11).

#### ***Public Matching Funds Findings***

The CFB matches contributions from individual New York City residents at a \$6-to-\$1 rate, up to \$1,050 per contributor. The CFB performs reviews to ensure that the correct amount of public funds was received by the Campaign and that public funds were spent in accordance with the Act and Rules. Findings in this section relate to whether any additional public funds are due, or any return of public funds by the Campaign is necessary.

- The Campaign did not document qualified expenditures equal to the amount of public funds it received (see Finding #12).

#### ***Other Findings***

- The Campaign did not respond to the Draft Audit Report (see Finding #13).

## 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: Zead Ramadan	Contribution Limit:
ID: 1675	\$2,750
Office Sought: City Council	
District: 7	Expenditure Limit:
	2010–2012: \$45,000
Committee Name: Zead Ramadan 2013	2013 Primary: \$168,000
Classification: Participant	2013 General: N/A
Certification Date: June 10, 2013	
	Public Funds:
Ballot Status: Primary	Received: \$50,731
Primary Election Date: September 10, 2013	Returned: \$0
Party: Democratic	Campaign Finance Summary:
	<a href="http://bit.ly/1rkQ3v5">http://bit.ly/1rkQ3v5</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 10, 2013. Based on various criteria, we also selected the Campaign for an onsite review, and visited the Campaign's location to observe its activity and review its recordkeeping. After the election, we performed an audit of all financial disclosure statements submitted for the election (see summary of activity reported in these statements at Appendix #1).

To verify that the Campaign accurately reported and documented all financial transactions, we requested all of the Campaign's bank statements and reconciled the financial activity on the bank statements to the financial activity reported on the Campaign's disclosure statements. We identified unreported, misreported, and duplicate disbursements, as well as reported disbursements that did not appear on the Campaign's bank statements. We also calculated debit and credit variances by comparing the total reported debits and credits to the total debits and credits amounts appearing on the bank statements. Because the Campaign reported that more than 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. However, the Campaign did not respond to the audit report. The Campaign was subsequently informed of its alleged violations and obligation to repay public funds, and was given the opportunity 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 must repay public funds and committed violations subject to penalty. The Campaign did not contest the CFB staff recommendations. 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.

**OTHER MATTERS**

On November 20, 2015, the Candidate contacted CFB staff, stating that he had never received the Notice of Alleged Violations and Recommended Penalties and Public Funds Notices and that he had learned of this matter for the first time following the Board's determination of October 23, 2015. CFB staff informed the Candidate that it had received a response form that purported to contain his signature as well as the Treasurer's. The Candidate denied having signed the form. CFB staff informed the Candidate that because the Board had already voted and issued a final determination, his only remaining remedies were to file a petition pursuant to Board Rule 5-02(a) to challenge the public funds determination and, subsequently, a petition pursuant to Article 78 of the Civil Practice Law and Rules to challenge the determination in its entirety. CFB staff advised the Candidate to retain all relevant documentation and information and any evidence supporting his contention that he did not receive the Notices or sign the response form.

## 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 and merchant account statements:

BANK	ACCOUNT #	ACCOUNT TYPE	STATEMENT PERIOD
Chase	XXXXXX9020	Checking	Dec 27, 2012 – Sep 20, 2013
Paypal	XXXXJLGW	Merchant	Dec 2012 – Jul 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 must provide the bank statements listed below:

BANK	ACCOUNT #	STATEMENT PERIOD
Chase	XXXXXX9020	Sep 21, 2013 – Present
Paypal	XXXXJLGW	Aug 2013 - Present

b) The Campaign did not report the transactions listed on Exhibit I that appear on its bank statements.<sup>1</sup>

<sup>1</sup> Specific unreported transactions were added to the Campaign’s expenditure limit calculation. For details, see Finding #11 and Exhibit VIc.

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

NAME	CHECK NO./ TRANSACTION	STATEMENT/ SCHEDULE/ TRANSACTION	PAID DATE	AMOUNT
NYC Board of Elections	n/a	7/F/R0000691	03/01/13	\$90.00
Rosas, Ariana	Debit	10/F/R0001270	08/01/13	\$500.00
Searles, Fitzroy	1166	11/F/R0001399	08/07/13	\$200.00
Rahman, Samiha	1170	11/F/R0001406	08/14/13	\$620.00
<b>Total</b>				<b>\$1,410.00</b>

d) The Campaign did not properly report the transaction listed below.<sup>2</sup>

NAME	CHECK NO./ TRANSACTION	STATEMENT/ SCHEDULE/ TRANSACTION	PAID DATE	REPORTED AMOUNT	ACTUAL AMOUNT	DIFFERENCE
Consolidate Edison of New York	Debit	12/F/R0001489	09/05/13	\$485.00	\$500.00	\$15.00

e) The Campaign reported duplicate transactions as listed below:

NAME	CHECK NO./ TRANSACTION	STATEMENT/ SCHEDULE/ TRANSACTION	PAID DATE	AMOUNT	DUPLICATE REPORTED AMOUNT
Najmi, Ali	Debit	10/F/R0001273	08/01/13	\$1,500.00	
Najmi, Ali	Debit	10/F/R0001285	08/02/13		\$1,500.00

<sup>2</sup> The net difference between the reported and actual amounts was added to the Campaign's expenditure limit calculation (see Finding #11 and Exhibit VIId).

f) A comparison of the Campaign's submitted bank statements with information reported in the Campaign's disclosure statements revealed the following overall net discrepancies in reporting:<sup>3</sup>

RECEIPTS:

TOTAL REPORTED MONETARY RECEIPTS <sup>4</sup>	TOTAL CREDITS PER BANK STATEMENTS	DOLLAR VARIANCE	PERCENT VARIANCE
\$183,482.00	\$197,217.57	(\$13,735.57)	-7.49%

DISBURSEMENTS:

TOTAL REPORTED MONETARY DISBURSEMENTS <sup>5</sup>	TOTAL DEBITS PER BANK STATEMENTS	DOLLAR VARIANCE	PERCENT VARIANCE
\$156,001.96	\$191,286.62	(\$35,284.66)	-22.62%

### Previously Provided Recommendation

- a) The Campaign must provide all pages of the requested bank statements.
- b) The Campaign must amend its disclosure statements to report these transactions. The Campaign must also provide documentation for each transaction. Because bank statements provide limited information about a transaction, the Campaign should review invoices or other records to obtain all of the information necessary to properly report the transaction.
- c) 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.

<sup>3</sup> The percentage variance is determined by subtracting the Total Per Bank Statements amount from the Total Reported amount, and then dividing by the Total Reported amount. A positive variance indicates that the Total Reported amount exceeds the Bank Statements amount. A negative variance indicates that the Total Reported amount is less than the Bank Statements amount.

<sup>4</sup> Total Reported Monetary Receipts includes monetary contributions, other receipts, public funds payments, transfers-in, loans, and expenditure refunds.

<sup>5</sup> Total Reported Monetary Disbursements includes bill payments, transfers-out, loan repayments, returns of public funds, and contribution refunds.

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

e) For duplicate transactions, the Campaign must delete the duplicate transactions in C-SMART and submit amended disclosure statements. If the transactions are not duplicates, the Campaign must explain why the transactions are not duplicates, and provide supporting documentation. The Campaign may also need to amend its disclosure statements if it did not report transactions accurately.

f) The Campaign must compare information reported on its financial disclosure statements to bank statements and supporting documentation for contributions and expenditures to identify and resolve the listed discrepancies. The Campaign may need to amend its disclosure statements and provide additional bank statements. The individual reporting errors and missing documentation identified in other parts of this finding are the source of some, or all, of the variance(s) cited, and as a result, responses to other parts of this finding will likely affect the cited variance(s). In responding to other parts of the finding, the Campaign should evaluate whether its response also addresses the overall discrepancies noted above.

Please note that any newly entered transactions that occurred during the election cycle (01/12/10—01/11/14) will appear as new transactions in an amendment to Disclosure Statement 16, even if the transaction dates are from earlier periods. Any transactions dated after the election cycle will appear in disclosure statements filed with the New York State Board of Elections. Also note that the Campaign must file an amendment for each disclosure statement in which transactions are being modified. Once all data entry is completed, the Campaign should run the Modified Statements Report in C-SMART to identify the statements for which the Campaign must submit amendments. The C-SMART draft and final submission screens also display the statement numbers for which the Campaign should file amendments. If the Campaign added any new transactions, it must submit an amendment to Disclosure Statement 16.<sup>6</sup>

### **Campaign's Response**

The Campaign did not respond to the Draft Audit Report. In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not contest this finding.

### **Board Action**

a) The Board found the Campaign in violation and assessed \$500 in penalties.

b) The Board found the Campaign in violation and in combination with Finding #3b and Finding #7e assessed \$797 in penalties.

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<sup>6</sup> If the Campaign amends its reporting with the CFB, it must also submit amendments to the New York State Board of Elections.



c - e) 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.

f) The Board found the Campaign in violation and assessed \$2,500 in penalties.

## 2. 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
9	07/15/13	07/16/13	1
10	08/09/13	08/10/13	1

### Previously Provided Recommendation

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

### Campaign's Response

The Campaign did not respond to the Draft Audit Report. In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not contest this finding.

### Board Action

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

## 3. Disclosure – Advances

For each advance, campaigns are required to report the name and address of the person making the purchase (the advancer), the amount, and the name of the vendor from whom the purchase was made. *See* Admin. Code §§ 3-703(1)(g), 3-708(8); Rule 3-03(c)(3).

a) The Campaign did not properly report the advance purchases listed below, which were identified during the CFB site visit. These may be related to the misreported advances described in part b) of this finding.

NAME	STATEMENT/ SCHEDULE/ TRANSACTION	PURCHASE DATE/ INVOICE DATE	AMOUNT	NOTE
MTA	Unreported	03/13/13	\$20.00	(1)
DMD Inc.	Unreported	04/14/13	\$18.00	(1)
Eagle Electronics Service	Unreported	04/16/13	\$20.00	(1)
New Superior Radio	Unreported	05/30/13	\$28.00	(1)

(1) During the CFB site visit on August 26, 2013, CFB staff reviewed the Campaign's expenditure documentation and noted expenditures that the Campaign had not reported. The Campaign explained that it had not paid for these expenditures, which were actually advance purchases. In an August 28, 2013 letter, the CFB instructed the Campaign to amend its disclosure statements to report these transactions as advances. The Campaign's reporting indicates that it incorrectly reported these transactions as purchases from the reported advancer without disclosing the names of the vendors (see also Finding #3b).

b) The Campaign did not properly report the name of vendors for the transactions listed in Exhibit II.

### Previously Provided Recommendation

a) The Campaign must amend its disclosure statements to properly report these transactions. *See* Recommendation b), below. If these are the same transactions described above in part b) of this finding, the Campaign must provide an explanation describing which expenditures are associated with each advance repayment.

b) For each advance purchase listed in Exhibit II, the Campaign must amend its disclosure statements to report the name and address of each vendor from whom the purchase was made. *See* also part a) of this finding. The Campaign must also submit all documentation related to each advance. This may include receipts or invoices for the purchase, evidence of who paid for the initial purchase, and copies of the checks used to reimburse the purchaser.

### Campaign's Response

The Campaign did not respond to the Draft Audit Report. In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not contest this finding.

### Board Action

- a) 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.
- b) The Board found the Campaign in violation and in combination with Finding #1b and Finding #7e assessed \$797 in penalties.

### 4. 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 these vendors:

PAYEE	AMOUNT PAID
Bravo Print and Mail	\$13,097.40
Bill Lynch Associates	\$17,500.00

### 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](http://www.nyccfb.info/PDF/forms/subcontractor_disclosure_form.pdf)) for this purpose, and submit the completed form with the Campaign's response. In addition, if subcontractors were used and paid more than \$5,000, the Campaign must amend its disclosure statements to report subcontractor information. If the vendor does not complete the Subcontractor Form, the Campaign should submit documentation of its attempts to obtain this information, including copies of certified mail receipts and the letters sent to the vendors.

### Campaign's Response

The Campaign did not respond to the Draft Audit Report. In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not contest this finding.

### Board Action

The Board found the Campaign in violation and assessed \$200 in penalties.

*Contribution Findings*

**5. Prohibited Contributions – Corporate/Partnership/LLC**

Campaigns may not accept, either directly or by transfer, any contribution, loan, guarantee, or other security for a loan from any corporation. This prohibition also applies to contributions received after December 31, 2007 from any partnership, limited liability partnership (LLP), or limited liability company (LLC). *See* New York City Charter §1052(a)(13); Admin. Code §§ 3-703(1)(l), 3-719(d); Rules 1-04(c), (e).

a) Prior to the election, the Campaign accepted a contribution from entities listed on the New York State Department of State’s website as corporations, partnerships, and/or LLCs in the following instance. After notification from the CFB, the Campaign refunded the contribution.

PREVIOUSLY REFUNDED CONTRIBUTIONS FROM PROHIBITED SOURCES				
NAME	STATEMENT/ SCHEDULE/ TRANSACTION	INCURRED/ RECEIVED/ REFUNDED DATE	AMOUNT	NOTE
Hassan, Nassef F	7/ABC/R0000500	03/08/13	\$500.00	(1)

(1) Although the Campaign reported the contribution as shown, the documentation provided indicates that this contribution was from Nassef F. Hassan Physician, P.C.

b) The Campaign provided a contract with Sykes Global Communication stating that the Campaign would pay the vendor \$15,000 for its services. The Campaign reported payments to this vendor totaling \$9,050. The Campaign did not report an expenditure for the remaining balance of \$5,950, nor was it reported as an outstanding liability. As a result, the Campaign’s reporting and documentation indicate that a third party paid for these transactions, or that the goods or services were provided by the vendor for free. *See* also Finding #7b) and Finding #11.

c) The Campaign provided a contract from Bill Lynch Associates stating that the Campaign would pay the vendor \$18,750 for its services. The Campaign reported payments to this vendor totaling \$17,500. The Campaign did not report an expenditure for the remaining balance of \$1,250, nor was it reported as an outstanding liability. As a result, the Campaign’s reporting and documentation indicate that a third party paid for these transactions, or that the goods or services were provided by the vendor for free. *See* also Finding #7c) and Finding #11.

### Previously Provided Recommendation

a) The Campaign previously refunded this prohibited contribution and no further response is necessary at this time. However, the Campaign may still be penalized for accepting this contribution. If the Campaign disagrees with this finding, it must provide an explanation and documentation to demonstrate that its acceptance of the contribution was not a violation.

b - c) For each transaction, the Campaign must provide a written explanation describing how the good or service was purchased or provided. If the purchase was previously reported, the Campaign must identify the relevant Transaction IDs of the purchase. If the Campaign purchased the goods or services listed, it must provide invoices, contracts, and any other documentation related to the purchase. If a third party purchased or donated the good or service, the Campaign must submit an in-kind contribution form completed by the contributor. If not previously reported, the Campaign must enter the bill and bill payment or in-kind contribution in C-SMART and submit an amendment to Statement 16.

### Campaign's Response

The Campaign did not respond to the Draft Audit Report. In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not contest this finding.

### Board Action

a) The Board found the Campaign in violation and assessed \$250 in penalties.

b) The Board found the Campaign in violation and assessed \$6,200 in penalties. *See* also Finding #7b).

c) The Board found the Campaign in violation and assessed \$1,500 in penalties. *See* also Finding #7c).

## 6. 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.nycffb.info](http://www.nycffb.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 contribution from unregistered political committees in the following instance. After notification from the CFB, the Campaign refunded the contribution, or the political committee registered with the CFB.

CONTRIBUTIONS FROM UNREGISTERED POLITICAL COMMITTEES THAT SUBSEQUENTLY  
REGISTERED OR WHOSE CONTRIBUTIONS WERE REFUNDED

NAME	STATEMENT/ SCHEDULE/ TRANSACTION	RECEIVED DATE	AMOUNT
African American Leadership PAC	10/ABC/R0001061	07/31/13	\$500.00

### 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 did not respond to the Draft Audit Report. In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not contest this finding.

### Board Action

The Board found the Campaign in violation and assessed \$250 in penalties.

## 7. 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).

a) The Campaign reported, but failed to adequately document, the following in-kind contributions. Due to the lack of documentation, the fair market value of the in-kind contributions could not be substantiated.

NAME	STATEMENT/ SCHEDULE/ TRANSACTION	RECEIVED DATE	AMOUNT	NOTE
Shah, Sajid	6/D/R0000168	01/10/13	\$441.00	
Lozada, Sussie	7/D/R0000689	02/24/13	\$250.00	
Mustafa, Bahir	7/D/R0000679	02/24/13	\$250.00	
Jamshaid, Mian	7/D/R0000696	03/09/13	\$300.00	(1)
Mustafa, Bahir	7/D/R0000680	03/11/13	\$200.00	(2)

(1) In response to the letter sent on August 28, 2013 describing findings from the CFB’s compliance visit, the Campaign stated that it attempted to obtain the requested in-kind form from Mr. Jamshaid and was unable to do so.

(2) The Campaign provided an in-kind contribution form from Mustafa Bahir; however, the form was missing a description of the expenses Mr. Bahir paid for on behalf of the Campaign. The Campaign also failed to provide documentation for this in-kind contribution, such as an invoice or receipt.

b) The Campaign provided a contract from Sykes Global Communication stating that the Campaign would pay the vendor \$15,000 for its services. The Campaign reported payments to this vendor totaling \$9,050. The Campaign did not report an expenditure for the remaining balance of \$5,950, nor was it reported as an outstanding liability. As a result, the Campaign’s reporting and documentation indicate that a third party paid for these transactions, or that the goods or services were provided by the vendor for free. *See* also Finding #5b) and Finding #11.

c) The Campaign provided a contract from Bill Lynch Associates stating that the Campaign would pay the vendor \$18,750 for its services. The Campaign reported payments to this vendor totaling \$17,500. The Campaign did not report an expenditure for the remaining balance of \$1,250, nor was it reported as an outstanding liability. As a result, the Campaign’s reporting and documentation indicate that a third party paid for these transactions, or that the goods or services were provided by the vendor for free. *See* also Finding #5c) and Finding #11.

d) The Campaign provided a copy of the employment agreement with Jason Elijio. The terms of the agreement state that Mr. Elijio would be compensated \$1,000 on a bi-weekly basis from February 1, 2013 until the end of the primary race, as determined by the Board of Elections. Therefore, the contract was in effect until the primary election date of September 10, 2013, totaling 7½ months and \$15,000. The Campaign reported payments to Mr. Elijio totaling \$14,500. The Campaign did not report an expenditure for the remaining balance of \$500, nor was it reported as an outstanding liability. As a result, the Campaign's reporting and documentation indicate that a third party paid for these transactions, or that the services were provided by Mr. Elijio for free. *See also Finding #11.*

e) The Campaign provided a copy of the consultant agreement with April G. Tyler. The terms of the agreement state that she would be compensated \$500 on a bi-weekly basis from February 1, 2013 until two days after the primary election, as determined by the Board of Elections. Therefore, the contract was in effect until September 12, 2013, totaling 7½ months and \$7,500. The Campaign reported payments to Ms. Tyler totaling \$5,000. The Campaign did not report an expenditure for the remaining balance of \$2,500, nor was it reported as an outstanding liability. As a result, the Campaign's reporting and documentation indicate that a third party paid for these transactions, or that the services were provided by Ms. Tyler for free. *See also Finding #11.*

### **Previously Provided Recommendation**

a) The Campaign must provide supporting documentation for each in-kind contribution(s) 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 and document its attempts to obtain the documentation.

b - e) The Campaign must explain the status of the balance due on the contact:

- If the balance of the contract remains outstanding, the Campaign may provide documentation showing that the debt remains an outstanding liability and that the vendor is attempting to collect the debt. Such documentation may include current invoices, and/or letters from vendor that demonstrate a consistent and ongoing collection effort. The Campaign must also submit amendments to its disclosure statements to report the outstanding liability. The Campaign must also explain its initial failure to report the balance due on the contract as an outstanding liability.
- If the Campaign has paid the vendor or consultant, amend each disclosure statement to correctly report the bill and the bill payment, and provide documentation for the bill and bill payment.



- If the liability has been forgiven, forgive the bill in C-SMART and amend each disclosure statement. The Campaign must also explain its initial failure to report the in-kind contribution. Any forgiven liabilities are considered in-kind contributions, which could result in other violations if the source was prohibited.
- Alternatively, the Campaign may provide documentation or evidence showing that that the balance of the contract is not owed. If the vendor or consultant did not complete the term of the contract, the Campaign must provide contemporaneous documentation showing the date on which services were terminated.

### **Campaign's Response**

The Campaign did not respond to the Draft Audit Report. In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not contest this finding.

### **Board Action**

- a) The Board found the Campaign in violation and in combination with Finding #11 assessed \$200 in penalties.
- b) The Board found the Campaign in violation and assessed \$6,200 in penalties. *See* also Finding #7b).
- c) The Board found the Campaign in violation and assessed \$1,500 in penalties. *See* also Finding #7c).
- d) 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.
- e) The Board found the Campaign in violation and in combination with Finding #1b and Finding #3b assessed \$797 in penalties.

### ***Expenditure Findings***

#### **8. Cash Disbursements Exceeding \$100 and Petty Cash Exceeding \$500**

Campaigns are prohibited from maintaining a petty cash fund greater than \$500. *See* Rule 4-01(e)(2). Campaigns are also prohibited from spending amounts greater than \$100 except by checks from a bank account reported to the CFB and signed by the Campaign's authorized signatory. *See* Rule 1-08(i).

a) Based on a review of the Campaign's bank statements, the Campaign's cash withdrawals were excessive in both number and amount (see Exhibit III). In addition, the Campaign did not report these transactions on its disclosure statements. *See* also Finding #1b. In the absence of reporting or documentation, the CFB identified those cash withdrawals exceeding \$100 as disbursements.

b) The Campaign made cash withdrawals listed on Exhibit III, which resulted in a petty cash fund exceeding the \$500 limit. These transactions were identified from the Campaign's bank statements, but were not reported on its disclosure statements. *See* also Finding #1b and Finding #8a.

### **Previously Provided Recommendation**

a) The Campaign must explain why the transactions do not constitute a violation of the Rules and must provide supporting documentation. The Campaign must amend its disclosure statements to report these transactions as petty cash fund deposits. Additionally, the Campaign must provide a copy of its petty cash disbursement records, which may include its Petty Cash Journal from C-SMART. *See* also Finding #1b.

b) The Campaign must explain why the transactions do not constitute a violation of the Rules and must provide supporting documentation. The Campaign must provide a copy of its petty cash disbursement records, which may include its Petty Cash Journal from C-SMART. *See* also Recommendation a) above.

### **Campaign's Response**

The Campaign did not respond to the Draft Audit Report. In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not contest this finding.

### **Board Action**

a - b) The Board found the Campaign in violation and assessed \$1,704 in penalties.

## **9. Expenditures – Not In Furtherance of the Campaign**

Campaigns may only spend campaign funds for items that further the candidate's election. Campaigns must keep detailed records to demonstrate that campaign funds were used only for those purposes. *See* Admin. Code §§ 3-703(1)(d), (g); Rule 4-01. The law gives examples of the types of expenditures that are presumed to be campaign-related, although in certain circumstances expenditures of the types listed as appropriate may be questioned. Among the relevant factors are: the quality of the documentation submitted; the timing and necessity of the expenditure; the amount of the expenditure and/or all expenditures of a specific type in relation to the Campaign's total expenditures; and whether the expenditure is duplicative of other spending. The law also

prohibits the conversion of campaign funds to personal use which is unrelated to a political campaign, and provides examples of expenditures that are not in furtherance of a campaign. *See* New York State Election Law §14-130; Admin. Code §§ 3-702(21), 3-703, and 3-710(2)(c); Rules 1-03(a), and 5-03(e), and Advisory Opinion No. 2007-3 (March 7, 2007). Expenditures not demonstrated to be in furtherance of the candidate’s election are considered “non-campaign related.” The total amount of non-campaign related expenditures was deducted from the Campaign’s expenditure limit calculation. *See* also Finding #11 and Exhibit VI.

a) The Campaign reported the expenditures listed below which—based on the reporting and/or documentation—are non-campaign related:

PAYEE	STATEMENT/ SCHEDULE/ TRANSACTION	PURPOSE CODE	TOTAL PER CONTRACT	TOTAL AMOUNT PAID	DIFFERENCE	NOTE
Miller, Rasul	Various	WAGES	\$11,250.00	\$15,200.00	\$3,950.00	(1)
Searles, Fitzroy	Various	WAGES	\$15,000.00	\$15,700.00	\$700.00	(2)
<b>Total</b>					<b>\$4,650.00</b>	

(1) The Campaign provided a copy of a consultant agreement stating that Rasul Miller would receive a total compensation of \$11,250; however, the Campaign reported payments totaling \$15,200. The total payments made to Rasul Miller includes a \$500 payment on January 22, 2013 (Transaction 7/F/R0000601), which was outside the period covered in the contract. The Campaign must explain how this expenditure was campaign-related.

(2) The Campaign provided a copy of a consultant agreement stating that Fitzroy Searles would receive a total compensation of \$15,000; however, the Campaign reported payments totaling \$15,700. The Campaign overpaid the consult by \$700. In addition, the total payments made to Fitzroy Searles includes a \$500 payment on January 22, 2013 (Transaction 7/F/R0000597), which was outside the period covered in the contract. The Campaign must explain how this expenditure was campaign-related.

b) The Campaign must provide supporting documentation or an explanation for the reported transactions listed Exhibit IV.

### Previously Provided Recommendation

a) The Campaign must explain how each expenditure listed is in furtherance of the Campaign, and provide supporting documentation. The explanation and documentation may include details of how, when, where, and by whom a good was used. Expenditures that are not in furtherance of the Campaign may increase the amount of public funds that must be repaid.

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

### **Campaign's Response**

a) The Campaign did not respond to the Draft Audit Report. In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not contest this finding. The total was added to the Campaign's expenditure limit calculation

b) The Campaign did not respond to the Draft Audit Report. In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not contest this finding.

### **Board Action**

a - b) The Board found the Campaign in violation and assessed \$1,912 in penalties.

## **10. 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 provided an invoice from the Campaign to the 2013 campaign of John Liu (Friends of John Liu) for services related to a shared palm card between the Campaign and 2013 candidates, John Liu and Letitia James (see Exhibit V). The Campaign did not provide a copy of the palm card associated with this joint expenditure, nor did the Campaign report receiving funds from the campaigns of John Liu or Letitia James.

### **Previously Provided Recommendation**

The Campaign must provide the invoice for the palm card printing. The Campaign must also provide the transaction(s) ID's associated with the joint palm card expense. If the Campaign did not report these expenditures, the Campaign must amend its disclosure statement to report the expenditure(s). The Campaign must also explain if it has received payment from the Friends of John Liu and/or the Letitia James 2013 committee. If the Campaign has received payment from either/one of the committees, the Campaign must amend its disclosure statement to report receiving the payment. Finally, the Campaign must provide a copy of the palm card.

### **Campaign's Response**

The Campaign did not respond to the Draft Audit Report. In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not contest this finding.

### **Board Action**

The Board found the Campaign in violation and in combination with Finding #7a assessed \$200 in penalties.

## 11. Expenditures – Exceeding the Legal Limit

Campaign Finance Program participants must abide by strict limits on the amount of money their campaigns spend. An expenditure is considered made when the good and/or service is received, used or rendered regardless of when the payment is made. The following types of expenditures are exempt and do not count toward the expenditure limit:

- Challenging or defending the validity of petitions or canvassing and re-canvassing election results
- Preparing for an appearance before the Board
- Limited expenses to prepare for the post-election audit

*See* Admin. Code §§ 3-706, 3-703(1)(i), 3-711(2)(a); Rules 1-08(b), (d), and (l).

Based on its reporting and documentation, the Campaign exceeded the primary election expenditure limit. *See* the details of the expenditure limit calculation at Exhibit VI. The following adjustments were made to the expenditure limit calculation:

- a) Undated expenditures were attributed to the primary election, see Exhibit VIa.
- b) Expenditures reported after the date of the election were attributed to the primary election, see Exhibit VIb.
- c) Unreported expenditures were attributed to the primary election, see Exhibit VIc.
- d) Expenditures misreported by the Campaign were attributed to the primary election, see Exhibit VI d.
- e) An unreported in-kind contribution from Sykes Global Communication was attributed to the primary election. *See* also Finding #7b.
- f) An unreported in-kind contribution from Bill Lynch Associates was attributed to the primary election. *See* Finding #7c.
- g) An unreported in-kind contribution from Jason Elijio was attributed to the primary election. *See* Finding #7d.
- h) An unreported in-kind contribution from April Tyler was attributed to the primary election. *See* Finding #7e.

## Previously Provided Recommendation

If the Campaign disagrees with the expenditure limit calculation, it must address the specific line items of the calculation as described below:

a – b) If the Campaign disagrees with the attribution of expenditures in the exhibit, for each transaction it must provide a detailed explanation of when the good and/or service was received, used, or rendered and provide supporting documentation. The Campaign must address each line of the calculation in dispute.

c) The Campaign must amend its disclosure statements to report these unreported transactions and must provide documentation for each transaction (see also Finding #1b).

d) The Campaign must amend its disclosure statements to accurately report the transactions (see also Finding #1d).

e – h) If the Campaign disagrees, the Campaign must address the discrepancy between reported payments and the contracts provided. *See* also Findings #7b – e.

## Campaign's Response

The Campaign did not respond to the Draft Audit Report. In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not contest this finding.

## Board Action

The Board found the Campaign in violation and assessed \$76,262 in penalties.

## *Public Matching Funds Findings*

### 12. Qualified Expenditure Documentation

Public funds may only be used for “qualified” expenditures by a candidate’s principal committee to further the candidate’s nomination or election during the calendar year in which the election is held. Expenditures that are not considered qualified include, but are not limited to, undocumented or unreported expenditures, payments to the candidate or the candidate’s relatives, payments in cash, contributions to other candidates, gifts, expenditures for petition defense or litigation, and advances except individual purchases of more than \$250. *See* Admin. Code § 3-704; Rule 1-08(g). Participants must return public funds, or may be limited in the amount of public funds they are eligible to receive post-election if they have not documented sufficient qualified expenditures. *See* Admin. Code § 3-710(2)(b); Rule 5-03(d).

Campaigns are required to obtain and maintain contemporaneous records that enable the CFB to verify that expenditures were qualified. *See* Admin. Code § 3-703(1)(d), (g); Rule 4-01. These records may include cancelled checks (front and back) and bills for goods or services. Bills must include the date the vendor was hired or the date the goods or services were received, the vendor's name and address, a detailed description of the goods or services, and the amount.

The Rules provide guidance for situations where contemporaneous records are either missing or incomplete. *See* Rule 4-01(a). First, a campaign must attempt to obtain a duplicate or more complete record from the vendor. If that is not possible, a campaign may modify an existing record or create a new record which must clearly identify the record as modified or recreated. In addition, any modified or recreated record must be accompanied by a notarized statement explaining the reason for and circumstances surrounding the record. The statement must be from a campaign representative who has firsthand knowledge of the recreated document and must explain why the original document is not available or insufficient. Upon review of the non-contemporaneous record and statement, the CFB may still find the records are not sufficient to adequately document the transaction.

The Campaign received \$50,731.00 in public funds for the 2013 elections. Previously, CFB staff requested documentation to demonstrate that public funds were used for qualified expenditures. Based on all the records submitted, the Campaign has provided sufficient documentation for \$36,831.98 in qualified expenditures. Qualified expenditures are marked with a "Q". For all other listed expenditures, the Campaign either:

- did not provide all of the necessary documentation to show the expenditure is qualified,
- provided documentation that requires further clarification, or
- provided documentation that shows the expenditure is not qualified.

If the Campaign does not document an additional \$13,899.02 as qualified, the Campaign must repay this amount to the Public Fund.

### **Previously Provided Recommendation**

Any transaction marked with a "Q" is considered a qualified expenditure and no additional documentation or information is required. Transactions marked "NQ" cannot be qualified, for reasons such as a payment to a family member or a payment made in cash, and additional documentation will not make them qualified. If the Campaign disagrees, it must provide an explanation and documentation. All other transactions are marked with a code that explains what is missing or inadequate. The Code Key is located at the end of the list.

The list of transactions is sorted by amount, starting with the largest expenditures (disbursements followed by outstanding liabilities and advances greater than \$250, if applicable). If a transaction has more than one code, the Campaign must address all codes before that expenditure may be considered qualified. The Campaign must provide explanations and/or documentation where

requested (copies of bills, detailed invoices, consulting agreements, work contracts, credit card statements, cancelled checks, etc., or recreated/modified records along with the required statements, as instructed above). In some cases, the Campaign may find it useful to supplement an invoice or other documentation already provided with evidence of work performed and/or a more detailed description of tasks performed or products received. In addition, the Campaign may need to submit amended disclosure statements to correct errors in its reporting of expenditures.

The Campaign must return a copy with its response. All documents submitted to the CFB must be labeled with the corresponding Transaction IDs.

### **Campaign's Response**

The Campaign did not respond to the Draft Audit Report. In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not contest this finding.

### **Board Action**

The Board determined that the Campaign must repay \$13,899 to the Public Fund (\$50,731.00 in public funds received less \$36,831.98 in documented qualified expenditures).

### *Other Findings*

#### **13. Failure to Respond Timely**

Campaigns are required to respond timely to requests from the CFB. *See* Admin. Code § 3-703(1)(d); Rules 1-09, 4-01.

The Campaign failed to submit a response to the following:

REQUEST	DUE DATE
Draft Audit Report	11/26/14

### **Previously Provided Recommendation**

This finding was identified as a result of the Campaign's failure to respond to the Draft Audit Report dated September 26, 2014.

### **Campaign's Response**

In its response to the Notice of Alleged Violations and Recommended Penalties, the Campaign did not contest this finding.



**Board Action**

The Board found the Campaign in violation and assessed \$5,073 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,



Signature on Original

Sauda S. Chapman

Director of Auditing and Accounting

Date: September 30, 2016

Staff: Melody Lee

Joel Babb

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

**Candidate:** Ramadan, Zead (ID:1675-P)**Office:** 5 (City Council)**Election:** 2013

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1. Opening cash balance (All committees)		\$0.00
2. Total itemized monetary contributions (Sch ABC)		\$132,751.00
3. Total unitemized monetary contributions		\$0.00
4. Total in-kind contributions (Sch D)		\$1,441.00
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)		\$154,751.96
Expenditure payments	\$154,409.16	
Advance repayments	\$342.80	
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)		\$0.00
17. Total receipts adjustment (Sch M - excluding CFB repayments)		\$1,250.00
18. Total outstanding liabilities (Sch N - last statement submitted)		\$94.39
Outstanding Bills	\$8.39	
Outstanding Advances	\$86.00	
19. Total advanced amount (Sch X)		\$0.00
20. Net public fund payments from CFB		\$50,731.00
Total public funds payment	\$50,731.00	
Total public funds returned	\$0.00	
21. Total Valid Matchable Claims		\$14,457.00
22. Total Invalid Matchable Claims		\$2,417.00
23. Total Amount of Penalties Assessed		\$97,448.00
24. Total Amount of Penalty Payments		\$0.00
25. Total Amount of Penalties Withheld		\$0.00

**Exhibit I**  
**Zead Ramadan 2013**  
**Unreported Transactions**  
**(see Finding #1b)**

<b>Payee</b>	<b>Check No./ Transaction</b>	<b>Date</b>	<b>Amount</b>	<b>Notes</b>
PayPal	Withdrawal	01/02/13	\$0.23	(2)
Chase (Counter Check )	Debit	01/22/13	\$8.00	(2)
Chase (supplies)	Debit	01/29/13	\$65.50	(2)
Chase (Check Order)	Debit	01/29/13	\$65.50	(2)
William Anderson HDFC	Withdrawal	01/31/13	\$1,000.00	(2)
Pathmark	debit	02/01/13	\$14.64	(2)
Unknown	ATM Withdrawal	02/06/13	\$40.00	(2)
Unknown	Withdrawal	02/20/13	\$300.00	(1) (2)
Deposited Item Returned	Debit	02/28/13	\$175.00	
Unknown	ATM Withdrawal	03/01/13	\$100.00	(2)
Unknown	ATM Withdrawal	03/14/13	\$100.00	(2)
Deposited Item Returned	Debit	03/14/13	\$2,000.00	
Chase	Service fee	03/14/13	\$24.00	(2)
Unknown	ATM Withdrawal	03/18/13	\$100.00	(2)
Deposited Item Returned	Debit	03/19/13	\$1,500.00	
Chase	Service fee	03/19/13	\$12.00	(2)
Unknown	ATM Withdrawal	03/21/13	\$100.00	(2)
Unknown	ATM Withdrawal	03/22/13	\$60.00	(2)
Unknown	ATM Withdrawal	03/26/13	\$61.75	(2)
Chase	Service fee	03/26/13	\$2.00	(2)
Unknown	ATM Withdrawal	03/27/13	\$100.99	(1) (2)
Chase	Service fee	03/27/13	\$2.00	(2)
Unknown	ATM Withdrawal	03/29/13	\$160.00	(1) (2)
AuthNet Gateway	Debit	04/02/13	\$20.00	(2)
Unknown	ATM Withdrawal	04/04/13	\$60.00	(2)
Unknown	ATM Withdrawal	04/05/13	\$120.00	(1) (2)
Unknown	ATM Withdrawal	04/08/13	\$60.00	(2)
Unknown	ATM Withdrawal	04/10/13	\$60.00	(2)
Unknown	ATM Withdrawal	04/11/13	\$160.00	(1) (2)
Unknown	ATM Withdrawal	04/12/13	\$120.00	(1) (2)
Unknown	ATM Withdrawal	04/15/13	\$60.00	(2)
Unknown	ATM Withdrawal	04/16/13	\$60.00	(2)
Unknown	ATM Withdrawal	04/17/13	\$80.00	(2)
Unknown	ATM Withdrawal	04/19/13	\$160.00	(1) (2)
Unknown	ATM Withdrawal	04/19/13	\$20.00	(1) (2)
Apple Store	Debit	04/22/13	\$86.01	(2)
Unknown	ATM Withdrawal	04/22/13	\$100.00	(2)
Unknown	ATM Withdrawal	04/23/13	\$160.00	(1) (2)
Unknown	ATM Withdrawal	04/24/13	\$240.00	(1) (2)
Unknown	ATM Withdrawal	04/25/13	\$200.00	(1) (2)
Unknown	ATM Withdrawal	04/26/13	\$380.00	(1) (2)
Joshua Williams	1091	04/29/13	\$250.00	(2)
Home Depot	Debit	04/30/13	\$175.57	(2)
Unknown	ATM Withdrawal	04/30/13	\$150.00	(1) (2)
Kaba Abdul-Fattah	1092	05/01/13	\$100.00	(2)
Unknown	ATM Withdrawal	05/01/13	\$100.00	(2)

**Exhibit I**  
**Zead Ramadan 2013**  
**Unreported Transactions**  
**(see Finding #1b)**

<b>Payee</b>	<b>Check No./ Transaction</b>	<b>Date</b>	<b>Amount</b>	<b>Notes</b>
Unknown	ATM Withdrawal	05/02/13	\$180.00	(1) (2)
Unknown	ATM Withdrawal	05/03/13	\$180.00	(1) (2)
Unknown	ATM Withdrawal	05/06/13	\$190.00	(2)
Unknown	ATM Withdrawal	05/07/13	\$180.00	(1) (2)
Unknown	ATM Withdrawal	05/07/13	\$20.00	(1) (2)
Unknown	ATM Withdrawal	05/08/13	\$40.00	(2)
Unknown	ATM Withdrawal	05/09/13	\$300.00	(1) (2)
Unknown	ATM Withdrawal	05/14/13	\$250.00	(1) (2)
Unknown	ATM Withdrawal	05/15/13	\$340.00	(1) (2)
Unknown	ATM Withdrawal	05/15/13	\$360.00	(1) (2)
Best Graphics	Debit	05/15/13	\$13.07	(2)
Unknown	ATM Withdrawal	05/16/13	\$80.00	(1) (2)
Unknown	ATM Withdrawal	05/16/13	\$360.00	(1) (2)
Unknown	ATM Withdrawal	05/16/13	\$340.00	(1) (2)
Unknown	ATM Withdrawal	05/17/13	\$320.00	(1) (2)
Grab & Go Gourmet	Debit	05/20/13	\$2.49	(2)
Unknown	ATM Withdrawal	05/20/13	\$400.00	(1) (2)
Unknown	ATM Withdrawal	05/20/13	\$21.50	(1) (2)
Unknown	ATM Withdrawal	05/20/13	\$60.00	(1) (2)
Chase	Service fee	05/20/13	\$2.00	(2)
Unknown	ATM Withdrawal	05/21/13	\$120.00	(1) (2)
Unknown	ATM Withdrawal	05/22/13	\$300.00	(1) (2)
Unknown	ATM Withdrawal	05/23/13	\$300.00	(1) (2)
Unknown	ATM Withdrawal	05/24/13	\$360.00	(1) (2)
Unknown	ATM Withdrawal	05/28/13	\$40.00	(2)
Unknown	ATM Withdrawal	05/30/13	\$450.00	(1) (2)
Unknown	ATM Withdrawal	05/31/13	\$200.00	(1) (2)
Unknown	ATM Withdrawal	05/31/13	\$20.00	(1) (2)
Unknown	ATM Withdrawal	06/03/13	\$250.00	(1) (2)
Fitzroy Searles	1123	06/04/13	\$28.00	(2)
Unknown	ATM Withdrawal	06/04/13	\$220.00	(1) (2)
Unknown	ATM Withdrawal	06/05/13	\$300.00	(1) (2)
Unknown	ATM Withdrawal	06/06/13	\$400.00	(1) (2)
Unknown	ATM Withdrawal	06/07/13	\$400.00	(1) (2)
Unknown	ATM Withdrawal	06/07/13	\$250.00	(1) (2)
Pathmark	Debit	06/10/13	\$8.09	(2)
unknown	ATM Withdrawal	06/10/13	\$380.00	(1) (2)
Unknown	ATM Withdrawal	06/10/13	\$160.00	(1) (2)
Unknown	ATM Withdrawal	06/11/13	\$400.00	(1) (2)
Unknown	ATM Withdrawal	06/12/13	\$240.00	(1) (2)
Unknown	ATM Withdrawal	06/13/13	\$320.00	(1) (2)
Unknown	ATM Withdrawal	06/14/13	\$460.00	(1) (2)
Unknown	ATM Withdrawal	06/17/13	\$500.00	(1) (2)
Unknown	ATM Withdrawal	06/18/13	\$80.00	(1) (2)
Unknown	ATM Withdrawal	06/19/13	\$240.00	(1) (2)
Unknown	ATM Withdrawal	06/20/13	\$240.00	(1) (2)

**Exhibit I**  
**Zead Ramadan 2013**  
**Unreported Transactions**  
**(see Finding #1b)**

<b>Payee</b>	<b>Check No./ Transaction</b>	<b>Date</b>	<b>Amount</b>	<b>Notes</b>
Marielys Gabino	1145	06/21/13	\$250.00	(2)
Maryum Ramadan	1146	06/21/13	\$250.00	(2)
Maryum Ramadan	1147	06/21/13	\$250.00	(2)
Unknown	ATM Withdrawal	06/21/13	\$500.00	(1) (2)
Chase	Service fee	06/21/13	\$34.00	(2)
Unknown	ATM Withdrawal	06/24/13	\$220.00	(1) (2)
Unknown	ATM Withdrawal	06/24/13	\$120.00	(1) (2)
Unknown	ATM Withdrawal	06/25/13	\$140.00	(1) (2)
Unknown	ATM Withdrawal	06/26/13	\$240.00	(1) (2)
Unknown	ATM Withdrawal	06/27/13	\$140.00	(1) (2)
Chase	Service fee	06/28/13	\$20.00	(2)
Unknown	ATM Withdrawal	07/01/13	\$60.00	(1) (2)
Unknown	ATM Withdrawal	07/01/13	\$100.00	(1) (2)
Marielys Gabino	1150	07/02/13	\$250.00	(2)
Unknown	ATM Withdrawal	07/02/13	\$80.00	(2)
Chase	NSF fee	07/02/13	\$34.00	(2)
Chase	NSF fee	07/03/13	\$34.00	(2)
Maryum Ramadan	1152	07/09/13	\$250.00	(2)
Unknown	ATM Withdrawal	07/09/13	\$160.00	(1) (2)
Unknown	ATM Withdrawal	07/09/13	\$40.00	(1) (2)
Unknown	ATM Withdrawal	07/10/13	\$60.00	(1) (2)
Unknown	ATM Withdrawal	07/10/13	\$40.00	(1) (2)
Unknown	ATM Withdrawal	07/10/13	\$60.00	(1) (2)
Unknown	ATM Withdrawal	07/12/13	\$20.00	(2)
Unknown	ATM Withdrawal	07/15/13	\$140.00	(1) (2)
Unknown	ATM Withdrawal	07/15/13	\$300.00	(1) (2)
Unknown	ATM Withdrawal	07/15/13	\$300.00	(1) (2)
Chase	Service fee	07/15/13	\$8.00	(2)
Unknown	ATM Withdrawal	07/18/13	\$80.00	(2)
Unknown	ATM Withdrawal	07/19/13	\$300.00	(1) (2)
Unknown	ATM Withdrawal	07/22/13	\$80.00	(1) (2)
Unknown	ATM Withdrawal	07/22/13	\$80.00	(1) (2)
Unknown	ATM Withdrawal	07/24/13	\$40.00	(2)
Unknown	ATM Withdrawal	07/26/13	\$60.00	(2)
Unknown	ATM Withdrawal	07/29/13	\$50.00	(2)
Chase	NSF fee	07/30/13	\$34.00	(2)
Unknown	ATM Withdrawal	07/31/13	\$51.50	(2)
Chase	Service fee	07/31/13	\$2.00	(2)
Chase	Official checks charge	08/01/13	\$8.00	(2)
Chase	Official checks charge	08/01/13	\$8.00	(2)
Chase	Official checks charge	08/02/13	\$8.00	(2)
Unknown	ATM Withdrawal	08/05/13	\$20.00	(2)
Unknown	ATM Withdrawal	08/05/13	\$60.00	(2)
Unknown	ATM Withdrawal	08/06/13	\$100.00	(2)
Ali Najmi	Withdrawal	08/06/13	\$2,000.00	(2)
Chase	Official checks charge	08/06/13	\$8.00	(2)

**Exhibit I**  
**Zead Ramadan 2013**  
**Unreported Transactions**  
**(see Finding #1b)**

<b>Payee</b>	<b>Check No./ Transaction</b>	<b>Date</b>	<b>Amount</b>	<b>Notes</b>
Chase	Official checks charge	08/06/13	\$8.00	(2)
Unknown	ATM Withdrawal	08/07/13	\$70.00	(1) (2)
Unknown	ATM Withdrawal	08/07/13	\$60.00	(1) (2)
Chase	Official checks charge	08/08/13	\$8.00	(2)
Unknown	ATM Withdrawal	08/09/13	\$120.00	(1) (2)
Unknown	Withdrawal	08/09/13	\$500.00	(1) (2)
Unknown	ATM Withdrawal	08/12/13	\$300.00	(1) (2)
Unknown	ATM Withdrawal	08/15/13	\$400.00	(1) (2)
Unknown	ATM Withdrawal	08/16/13	\$100.00	(1) (2)
Unknown	ATM Withdrawal	08/16/13	\$50.00	(1) (2)
Chase	Insufficient Funds fee	08/16/13	\$34.00	(2)
Chase	Insufficient Funds fee	08/19/13	\$34.00	(2)
Chase	Insufficient Funds fee	08/20/13	\$34.00	(2)
Chase	Insufficient Funds fee	08/20/13	\$34.00	(2)
Chase	Extended Overdraft Fee	08/23/13	\$15.00	(2)
Chase	Official checks charge	08/30/13	\$8.00	(2)
Staples	Debit	09/04/13	\$212.31	(2)
Dunkin Donuts	Debit	09/09/13	\$28.32	(2)
Unknown	ATM Withdrawal	09/09/13	\$100.00	(2)
Staples	Debit	09/09/13	\$362.48	(2)
NYC Taxi	Debit	09/10/13	\$14.88	(2)
NYC Taxi	Debit	09/10/13	\$8.62	(2)
Domino's	Debit	09/10/13	\$59.36	(2)
NYC Taxi	Debit	09/11/13	\$9.50	(2)
B T 99 Cents Plus	Debit	09/11/13	\$26.10	(2)
Shell Oil	Debit	09/11/13	\$69.41	(2)
Unknown	ATM Withdrawal	09/11/13	\$40.00	(2)
NYC Taxi	Debit	09/12/13	\$1.00	(2)
Shell Oil	Debit	09/13/13	\$158.59	(2)
Law office of Ali	Debit	09/17/13	\$4,000.00	(2)
Unknown	1256	09/19/13	\$405.00	(2)
Unknown	1257	09/23/13	\$120.00	(2)
Unknown	1258	09/23/13	\$400.00	(2)
NYC Taxi	Debit	09/23/13	\$45.00	(2)
Unknown	1261	09/27/13	\$1,000.00	(2)
Unknown	1199	09/30/13	\$750.00	(2)
Unknown	1200	09/30/13	\$1,000.00	(2)
Unknown	1233	09/30/13	\$250.00	(2)
Unknown	1234	09/30/13	\$250.00	(2)
Unknown	1263	09/30/13	\$850.00	(2)
<b>Total</b>			<b><u>\$38,243.41</u></b>	

**Notes:**

(1) See also Finding #7e.

(2) See also Finding #10.

**Exhibit II**  
**Zead Ramadan 2013**  
**Transaction Report for Advance Purchases**  
**(see Finding #3b)**



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

**Candidate:** Ramadan, Zead (ID:1675-P)

**Office:** 5 (City Council)

**Election:** 2013

**Advancer Name:** Blanco, Larry G (ID:805)

**Advancer Address:** [REDACTED] New York, NY 10031

Vendor Name	Vendor Address	Comm Id	Statement	Reference Number	Purchase Date	Purpose Code	Reason	Instrument Code	Amount
Blanco, Larry G	[REDACTED] New York, NY 10031	H	12(09/20/2013)	R0001411	04/16/2013	OTHER	Internet Service	Cash	\$20.00
								<b>Total:</b>	\$20.00

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

**Candidate:** Ramadan, Zead (ID:1675-P)

**Office:** 5 (City Council)

**Election:** 2013

**Advancer Name:** Miller, Rasul (ID:599)

**Advancer Address:** [REDACTED] New York, NY 10030

Vendor Name	Vendor Address	Comm Id	Statement	Reference Number	Purchase Date	Purpose Code	Reason	Instrument Code	Amount
Miller, Rasul	[REDACTED] New York, NY 10030	H	12(09/20/2013)	R0001412	03/13/2013	OTHER	Transportation	Credit Card	\$20.00
								<b>Total:</b>	\$20.00

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

**Candidate:** Ramadan, Zead (ID:1675-P)

**Office:** 5 (City Council)

**Election:** 2013

**Advancer Name:** Searles, Fitzroy (ID:595)

**Advancer Address:**

Vendor Name	Vendor Address	Comm Id	Statement	Reference Number	Purchase Date	Purpose Code	Reason	Instrument Code	Amount
Searles, Fitzroy		H	12(09/20/2013)	R0001409	04/14/2013	OTHER	Car Service	Cash	\$18.00
Searles, Fitzroy		H	10(08/09/2013)	R0001363	04/19/2013	OFFCE	Wireless Internet	Credit Card	\$197.22
Searles, Fitzroy		H	10(08/09/2013)	R0001365	05/21/2013	OFFCE	Internet Service	Credit Card	\$49.99
Searles, Fitzroy		H	12(09/20/2013)	R0001410	05/30/2013	OTHER	Car Service	Cash	\$28.00
Searles, Fitzroy		H	10(08/09/2013)	R0001367	06/25/2013	OFFCE	Photocopying	Credit Card	\$28.84
Searles, Fitzroy		H	10(08/09/2013)	R0001369	07/03/2013	OFFCE	Photocopying	Credit Card	\$16.75
Searles, Fitzroy		H	11(08/30/2013)	R0001370	08/16/2013	OTHER	Car Service	Credit Card	\$50.00
<b>Total:</b>									\$388.80

**Exhibit III**  
**Zead Ramadan 2013**  
**Cash Disbursements Exceeding \$100**  
**(see Finding #8a)**

<b>Check No.</b>	<b>Date</b>	<b>Amount</b>	<b>Notes</b>
Withdrawal	02/20/13	\$300.00	
ATM Withdrawal	03/27/13	\$100.99	
ATM Withdrawal	03/29/13	\$160.00	
ATM Withdrawal	04/05/13	\$120.00	
ATM Withdrawal	04/11/13	\$160.00	
ATM Withdrawal	04/12/13	\$120.00	
ATM Withdrawal	04/19/13	\$160.00	
ATM Withdrawal	04/19/13	\$20.00	(1)
ATM Withdrawal	04/23/13	\$160.00	
ATM Withdrawal	04/24/13	\$240.00	
ATM Withdrawal	04/25/13	\$200.00	
ATM Withdrawal	04/26/13	\$380.00	
ATM Withdrawal	04/30/13	\$150.00	
ATM Withdrawal	05/02/13	\$180.00	
ATM Withdrawal	05/03/13	\$180.00	
ATM Withdrawal	05/06/13	\$190.00	
ATM Withdrawal	05/07/13	\$180.00	
ATM Withdrawal	05/07/13	\$20.00	(1)
ATM Withdrawal	05/09/13	\$300.00	
ATM Withdrawal	05/14/13	\$250.00	
ATM Withdrawal	05/15/13	\$340.00	(2)
ATM Withdrawal	05/15/13	\$360.00	(2)
ATM Withdrawal	05/16/13	\$80.00	(1) (2)
ATM Withdrawal	05/16/13	\$360.00	(2)
ATM Withdrawal	05/16/13	\$340.00	(2)
ATM Withdrawal	05/17/13	\$320.00	
ATM Withdrawal	05/20/13	\$400.00	
ATM Withdrawal	05/20/13	\$21.50	(1)
ATM Withdrawal	05/20/13	\$60.00	(1)
ATM Withdrawal	05/21/13	\$120.00	
ATM Withdrawal	05/22/13	\$300.00	
ATM Withdrawal	05/23/13	\$300.00	
ATM Withdrawal	05/24/13	\$360.00	
ATM Withdrawal	05/30/13	\$450.00	
ATM Withdrawal	05/31/13	\$200.00	
ATM Withdrawal	05/31/13	\$20.00	(1)
ATM Withdrawal	06/03/13	\$250.00	
ATM Withdrawal	06/04/13	\$220.00	
ATM Withdrawal	06/05/13	\$300.00	
ATM Withdrawal	06/06/13	\$400.00	
ATM Withdrawal	06/07/13	\$400.00	(2)
ATM Withdrawal	06/07/13	\$250.00	(2)
ATM Withdrawal	06/10/13	\$380.00	(2)
ATM Withdrawal	06/10/13	\$160.00	(2)
ATM Withdrawal	06/11/13	\$400.00	
ATM Withdrawal	06/12/13	\$240.00	
ATM Withdrawal	06/13/13	\$320.00	
ATM Withdrawal	06/14/13	\$460.00	

**Exhibit III**  
**Zead Ramadan 2013**  
**Cash Disbursements Exceeding \$100**  
**(see Finding #8a)**

<b>Check No.</b>	<b>Date</b>	<b>Amount</b>	<b>Notes</b>
ATM Withdrawal	06/17/13	\$500.00	
ATM Withdrawal	06/19/13	\$240.00	
ATM Withdrawal	06/20/13	\$240.00	
ATM Withdrawal	06/21/13	\$500.00	
ATM Withdrawal	06/24/13	\$220.00	
ATM Withdrawal	06/24/13	\$120.00	
ATM Withdrawal	06/25/13	\$140.00	
ATM Withdrawal	06/26/13	\$240.00	
ATM Withdrawal	06/27/13	\$140.00	
ATM Withdrawal	07/01/13	\$60.00	(1)
ATM Withdrawal	07/01/13	\$100.00	
ATM Withdrawal	07/09/13	\$160.00	
ATM Withdrawal	07/09/13	\$40.00	
ATM Withdrawal	07/10/13	\$60.00	(1)
ATM Withdrawal	07/10/13	\$40.00	(1)
ATM Withdrawal	07/10/13	\$60.00	(1)
ATM Withdrawal	07/15/13	\$140.00	(2)
ATM Withdrawal	07/15/13	\$300.00	(2)
ATM Withdrawal	07/15/13	\$300.00	(2)
ATM Withdrawal	07/19/13	\$300.00	
ATM Withdrawal	07/22/13	\$80.00	(1)
ATM Withdrawal	07/22/13	\$80.00	(1)
ATM Withdrawal	08/07/13	\$70.00	(1)
ATM Withdrawal	08/07/13	\$60.00	(1)
ATM Withdrawal	08/09/13	\$120.00	(2)
Withdrawal	08/09/13	\$500.00	(2)
ATM Withdrawal	08/12/13	\$300.00	
ATM Withdrawal	08/15/13	\$400.00	
ATM Withdrawal	08/16/13	\$100.00	
ATM Withdrawal	08/16/13	\$50.00	(1)
<b>Total</b>		<b><u>\$17,042.49</u></b>	

**Notes:**

(1) Although this individual cash withdrawal is less than \$100, the Campaign's withdrawals on this day are in aggregate greater than \$100.

(2) See also Finding #8b.

**Exhibit IV**  
**Zead Ramadan 2013**  
**Non-Campaign Related Expenditures**  
**(see Finding #9)**

<b>Name</b>	<b>Transaction Type</b>	<b>Statement/ Schedule/ Transaction ID</b>	<b>Incurred/ Received/ Paid Date</b>	<b>Amount</b>	<b>Notes</b>
Ahmad, Aisha	Expenditure Payment	7/F/R0000660	02/27/13	\$1,000.00	(1)
Ramadan, Maryam	Expenditure Payment	10/F/R0001227	05/03/13	\$250.00	(2)
Ramadan, Maryam	Expenditure Payment	10/F/R0001229	05/13/13	\$250.00	(2)
Ramadan, Maryam	Expenditure Payment	10/F/R0001233	05/20/13	\$250.00	(2)
Ramadan, Maryam	Expenditure Payment	10/F/R0001235	05/31/13	\$250.00	(2)
Ramadan, Maryam	Expenditure Payment	10/F/R0001237	05/31/13	\$250.00	(2)
Ramadan, Maryam	Expenditure Payment	10/F/R0001241	06/11/13	\$250.00	(2)
Ramadan, Maryam	Expenditure Payment	11/F/R0001396	08/06/13	\$500.00	(2)
<b>Total</b>				<b><u>\$3,000.00</u></b>	

**Notes:**

- (1) The Campaign was instructed in its Compliance Visit findings letter dated August 28, 2013 to provide the contract for this expenditure. The Campaign failed to provide a contract or any documentation for the expenditure.
- (2) The Campaign must provide supporting documentation such as a contract or timesheets for this expenditure. The Campaign must also explain the relationship of the employee to the Candidate.

**Exhibit V**  
**Zead Ramadan 2013**  
**Non-Campaign Related Expenditure**  
**(see Finding #9b)**

1/29/2014

Zead Ramdan 2013  
c/o Jason Eljio  
1638 Amsterdam Ave  
New York, NY 10031

# INVOICE

INVOICE #001

DATE: 10/4/2013

**TO:**

**FRIENDS OF JOHN LIU  
SHIANG LIU, TREASURER**

**FOR:**

GOTV Palm Card

DESCRIPTION	AMOUNT
<b>FOR: GOTV PALM CARD</b>	
Joint Palm Card (Liu, James, Zead)	\$319.00
Subtotal	\$319.00
Tax	-
TOTAL	\$319.00



New York City Campaign Finance Board  
 Campaign Finance Information System  
 Exhibit VI  
 Zead Ramadan 2013  
 Primary Election Expenditure Limit Calculation  
 (see Alleged Violation #11)

**Election:** 2013  
**Candidate:** Ramadan, Zead (ID:1675-P)  
**Office:** 5 (City Council)

	<u>2010-2012</u>	<u>2013</u>
Total Reported Primary Expenditures:	\$0.00	\$155,961.35
Less Claimed Exempt Expenditures:	(\$0.00)	(\$0.00)
<b>Audit Adjustments:</b>		
Undated Transactions Attributable to the Primary (see Exhibit VIa)	\$0.00	\$86.00
Post Elect Expenditures Attributable to Primary Election (see Exhibit VIb)	\$0.00	\$240.00
Expenditures: Unreported (see Exhibit VIc)	\$0.00	\$34,568.41
Expenditures: Misreported (see Exhibit VI d)	\$0.00	\$15.00
In-Kind Contributions: Unreported (see Finding #7b)	\$0.00	\$5,950.00
In-Kind Contributions: Unreported (see Finding #7c)	\$0.00	\$1,250.00
In-Kind Contributions: Unreported (see Finding #7d)	\$0.00	\$500.00
In-Kind Contributions: Unreported (see Finding #7e)	\$0.00	\$2,500.00
Other: (see Findings #9a & 9b)	\$0.00	(\$7,650.00)
Less Prior Year Expenditure Limits	(\$45,000.00)	
Prior Year Amounts Over the Limit	\$0.00	\$0.00
		<hr/>
	Adjusted Expenditures	\$193,420.76
	Less Current Year Expenditure Limit	(\$168,000.00)
	<b>Cumulative Amount Over the Limit</b>	<hr/> <b>\$25,420.76</b> <hr/>

**Exhibit VIa**  
**Zead Ramadan 2013**  
**Undated Transactions Attributable to the Primary**  
**(see Finding #11a)**

<b>Name</b>	<b>Statement/ Schedule/ Transaction ID</b>	<b>Purpose Code</b>	<b>Invoice Date</b>	<b>Paid Date</b>	<b>Amount</b>
Searles, Fitzroy	16/N/R0000595	ADVAN	Unknown	Unknown	\$46.00
Miller, Rasul	16/N/R0000599	ADVAN	Unknown	Unknown	\$20.00
Blanco, Larry G	16/N/R0000805	ADVAN	Unknown	Unknown	\$20.00
<b>Total</b>					<b><u>\$86.00</u></b>

**Exhibit VIb**  
**Zead Ramadan 2013**  
**Post-Election Expenditures Attributable to the Primary**  
**(see Finding #11b)**

<b>Name</b>	<b>Statement/ Schedule/ Transaction ID</b>	<b>Purpose Code</b>	<b>Invoice Date</b>	<b>Paid Date</b>	<b>Amount</b>
Green, Rodney	12/F/R0001560	WAGES	09/11/13	09/11/13	\$120.00
Lindsey, Anthony	12/F/R0001563	WAGES	09/11/13	09/11/13	\$120.00
<b>Total</b>					<b><u>\$240.00</u></b>

**Exhibit VIc**  
**Zead Ramadan 2013**  
**Unreported Transactions**  
**(see Finding #11c)**

<b>Payee</b>	<b>Check No./ Transaction</b>	<b>Date</b>	<b>Amount</b>	<b>Notes</b>
PayPal	Withdrawal	01/02/13	\$0.23	(1)
Chase (Counter Check )	Debit	01/22/13	\$8.00	(1)
Chase (supplies)	Debit	01/29/13	\$65.50	(1)
Chase (Check Order)	Debit	01/29/13	\$65.50	(1)
William Anderson HDFC	Withdrawal	01/31/13	\$1,000.00	(1)
Pathmark	debit	02/01/13	\$14.64	(1)
Unknown	ATM Withdrawal	02/06/13	\$40.00	(1)
Unknown	Withdrawal	02/20/13	\$300.00	(1)
Unknown	ATM Withdrawal	03/01/13	\$100.00	(1)
Unknown	ATM Withdrawal	03/14/13	\$100.00	(1)
Chase	Service fee	03/14/13	\$24.00	(1)
Unknown	ATM Withdrawal	03/18/13	\$100.00	(1)
Chase	Service fee	03/19/13	\$12.00	(1)
Unknown	ATM Withdrawal	03/21/13	\$100.00	(1)
Unknown	ATM Withdrawal	03/22/13	\$60.00	(1)
Unknown	ATM Withdrawal	03/26/13	\$61.75	(1)
Chase	Service fee	03/26/13	\$2.00	(1)
Unknown	ATM Withdrawal	03/27/13	\$100.99	(1)
Chase	Service fee	03/27/13	\$2.00	(1)
Unknown	ATM Withdrawal	03/29/13	\$160.00	(1)
AuthNet Gateway	Debit	04/02/13	\$20.00	(1)
Unknown	ATM Withdrawal	04/04/13	\$60.00	(1)
Unknown	ATM Withdrawal	04/05/13	\$120.00	(1)
Unknown	ATM Withdrawal	04/08/13	\$60.00	(1)
Unknown	ATM Withdrawal	04/10/13	\$60.00	(1)
Unknown	ATM Withdrawal	04/11/13	\$160.00	(1)
Unknown	ATM Withdrawal	04/12/13	\$120.00	(1)
Unknown	ATM Withdrawal	04/15/13	\$60.00	(1)
Unknown	ATM Withdrawal	04/16/13	\$60.00	(1)
Unknown	ATM Withdrawal	04/17/13	\$80.00	(1)
Unknown	ATM Withdrawal	04/19/13	\$160.00	(1)
Unknown	ATM Withdrawal	04/19/13	\$20.00	(1)
Apple Store	Debit	04/22/13	\$86.01	(1)
Unknown	ATM Withdrawal	04/22/13	\$100.00	(1)
Unknown	ATM Withdrawal	04/23/13	\$160.00	(1)
Unknown	ATM Withdrawal	04/24/13	\$240.00	(1)
Unknown	ATM Withdrawal	04/25/13	\$200.00	(1)
Unknown	ATM Withdrawal	04/26/13	\$380.00	(1)
Joshua Williams	1091	04/29/13	\$250.00	(1)
Home Depot	Debit	04/30/13	\$175.57	(1)
Unknown	ATM Withdrawal	04/30/13	\$150.00	(1)
Kaba Abdul-Fattah	1092	05/01/13	\$100.00	(1)
Unknown	ATM Withdrawal	05/01/13	\$100.00	(1)
Unknown	ATM Withdrawal	05/02/13	\$180.00	(1)
Unknown	ATM Withdrawal	05/03/13	\$180.00	(1)
Unknown	ATM Withdrawal	05/06/13	\$190.00	(1)

**Exhibit VIc**  
**Zead Ramadan 2013**  
**Unreported Transactions**  
**(see Finding #10c)**

<b>Payee</b>	<b>Check No./ Transaction</b>	<b>Date</b>	<b>Amount</b>	<b>Notes</b>
Unknown	ATM Withdrawal	05/07/13	\$180.00	(1)
Unknown	ATM Withdrawal	05/07/13	\$20.00	(1)
Unknown	ATM Withdrawal	05/08/13	\$40.00	(1)
Unknown	ATM Withdrawal	05/09/13	\$300.00	(1)
Unknown	ATM Withdrawal	05/14/13	\$250.00	(1)
Unknown	ATM Withdrawal	05/15/13	\$340.00	(1)
Unknown	ATM Withdrawal	05/15/13	\$360.00	(1)
Best Graphics	Debit	05/15/13	\$13.07	(1)
Unknown	ATM Withdrawal	05/16/13	\$80.00	(1)
Unknown	ATM Withdrawal	05/16/13	\$360.00	(1)
Unknown	ATM Withdrawal	05/16/13	\$340.00	(1)
Unknown	ATM Withdrawal	05/17/13	\$320.00	(1)
Grab & Go Gourmet	Debit	05/20/13	\$2.49	(1)
Unknown	ATM Withdrawal	05/20/13	\$400.00	(1)
Unknown	ATM Withdrawal	05/20/13	\$21.50	(1)
Unknown	ATM Withdrawal	05/20/13	\$60.00	(1)
Chase	Service fee	05/20/13	\$2.00	(1)
Unknown	ATM Withdrawal	05/21/13	\$120.00	(1)
Unknown	ATM Withdrawal	05/22/13	\$300.00	(1)
Unknown	ATM Withdrawal	05/23/13	\$300.00	(1)
Unknown	ATM Withdrawal	05/24/13	\$360.00	(1)
Unknown	ATM Withdrawal	05/28/13	\$40.00	(1)
Unknown	ATM Withdrawal	05/30/13	\$450.00	(1)
Unknown	ATM Withdrawal	05/31/13	\$200.00	(1)
Unknown	ATM Withdrawal	05/31/13	\$20.00	(1)
Unknown	ATM Withdrawal	06/03/13	\$250.00	(1)
Fitzroy Searles	1123	06/04/13	\$28.00	(1)
Unknown	ATM Withdrawal	06/04/13	\$220.00	(1)
Unknown	ATM Withdrawal	06/05/13	\$300.00	(1)
Unknown	ATM Withdrawal	06/06/13	\$400.00	(1)
Unknown	ATM Withdrawal	06/07/13	\$400.00	(1)
Unknown	ATM Withdrawal	06/07/13	\$250.00	(1)
Pathmark	Debit	06/10/13	\$8.09	(1)
unknown	ATM Withdrawal	06/10/13	\$380.00	(1)
Unknown	ATM Withdrawal	06/10/13	\$160.00	(1)
Unknown	ATM Withdrawal	06/11/13	\$400.00	(1)
Unknown	ATM Withdrawal	06/12/13	\$240.00	(1)
Unknown	ATM Withdrawal	06/13/13	\$320.00	(1)
Unknown	ATM Withdrawal	06/14/13	\$460.00	(1)
Unknown	ATM Withdrawal	06/17/13	\$500.00	(1)
Unknown	ATM Withdrawal	06/18/13	\$80.00	(1)
Unknown	ATM Withdrawal	06/19/13	\$240.00	(1)
Unknown	ATM Withdrawal	06/20/13	\$240.00	(1)
Marielys Gabino	1145	06/21/13	\$250.00	(1)
Maryum Ramadan	1146	06/21/13	\$250.00	(1)
Maryum Ramadan	1147	06/21/13	\$250.00	(1)

**Exhibit VIc**  
**Zead Ramadan 2013**  
**Unreported Transactions**  
**(see Finding #10c)**

<b>Payee</b>	<b>Check No./ Transaction</b>	<b>Date</b>	<b>Amount</b>	<b>Notes</b>
Unknown	ATM Withdrawal	06/21/13	\$500.00	(1)
Chase	Service fee	06/21/13	\$34.00	(1)
Unknown	ATM Withdrawal	06/24/13	\$220.00	(1)
Unknown	ATM Withdrawal	06/24/13	\$120.00	(1)
Unknown	ATM Withdrawal	06/25/13	\$140.00	(1)
Unknown	ATM Withdrawal	06/26/13	\$240.00	(1)
Unknown	ATM Withdrawal	06/27/13	\$140.00	(1)
Chase	Service fee	06/28/13	\$20.00	(1)
Unknown	ATM Withdrawal	07/01/13	\$60.00	(1)
Unknown	ATM Withdrawal	07/01/13	\$100.00	(1)
Marielys Gabino	1150	07/02/13	\$250.00	(1)
Unknown	ATM Withdrawal	07/02/13	\$80.00	(1)
Chase	NSF fee	07/02/13	\$34.00	(1)
Chase	NSF fee	07/03/13	\$34.00	(1)
Maryum Ramadan	1152	07/09/13	\$250.00	(1)
Unknown	ATM Withdrawal	07/09/13	\$160.00	(1)
Unknown	ATM Withdrawal	07/09/13	\$40.00	(1)
Unknown	ATM Withdrawal	07/10/13	\$60.00	(1)
Unknown	ATM Withdrawal	07/10/13	\$40.00	(1)
Unknown	ATM Withdrawal	07/10/13	\$60.00	(1)
Unknown	ATM Withdrawal	07/12/13	\$20.00	(1)
Unknown	ATM Withdrawal	07/15/13	\$140.00	(1)
Unknown	ATM Withdrawal	07/15/13	\$300.00	(1)
Unknown	ATM Withdrawal	07/15/13	\$300.00	(1)
Chase	Service fee	07/15/13	\$8.00	(1)
Unknown	ATM Withdrawal	07/18/13	\$80.00	(1)
Unknown	ATM Withdrawal	07/19/13	\$300.00	(1)
Unknown	ATM Withdrawal	07/22/13	\$80.00	(1)
Unknown	ATM Withdrawal	07/22/13	\$80.00	(1)
Unknown	ATM Withdrawal	07/24/13	\$40.00	(1)
Unknown	ATM Withdrawal	07/26/13	\$60.00	(1)
Unknown	ATM Withdrawal	07/29/13	\$50.00	(1)
Chase	NSF fee	07/30/13	\$34.00	(1)
Unknown	ATM Withdrawal	07/31/13	\$51.50	(1)
Chase	Service fee	07/31/13	\$2.00	(1)
Chase	Official checks charge	08/01/13	\$8.00	(1)
Chase	Official checks charge	08/01/13	\$8.00	(1)
Chase	Official checks charge	08/02/13	\$8.00	(1)
Unknown	ATM Withdrawal	08/05/13	\$20.00	(1)
Unknown	ATM Withdrawal	08/05/13	\$60.00	(1)
Unknown	ATM Withdrawal	08/06/13	\$100.00	(1)
Ali Najmi	Withdrawal	08/06/13	\$2,000.00	(1)
Chase	Official checks charge	08/06/13	\$8.00	(1)
Chase	Official checks charge	08/06/13	\$8.00	(1)
Unknown	ATM Withdrawal	08/07/13	\$70.00	(1)
Unknown	ATM Withdrawal	08/07/13	\$60.00	(1)

**Exhibit VIc**  
**Zead Ramadan 2013**  
**Unreported Transactions**  
**(see Finding #10c)**

<b>Payee</b>	<b>Check No./ Transaction</b>	<b>Date</b>	<b>Amount</b>	<b>Notes</b>
Chase	Official checks charge	08/08/13	\$8.00	(1)
Unknown	ATM Withdrawal	08/09/13	\$120.00	(1)
Unknown	Withdrawal	08/09/13	\$500.00	(1)
Unknown	ATM Withdrawal	08/12/13	\$300.00	(1)
Unknown	ATM Withdrawal	08/15/13	\$400.00	(1)
Unknown	ATM Withdrawal	08/16/13	\$100.00	(1)
Unknown	ATM Withdrawal	08/16/13	\$50.00	(1)
Chase	Insufficient Funds fee	08/16/13	\$34.00	(1)
Chase	Insufficient Funds fee	08/19/13	\$34.00	(1)
Chase	Insufficient Funds fee	08/20/13	\$34.00	(1)
Chase	Insufficient Funds fee	08/20/13	\$34.00	(1)
Chase	Extended Overdraft Fee	08/23/13	\$15.00	(1)
Chase	Official checks charge	08/30/13	\$8.00	(1)
Staples	Debit	09/04/13	\$212.31	(1)
Dunkin Donuts	Debit	09/09/13	\$28.32	(1)
Unknown	ATM Withdrawal	09/09/13	\$100.00	(1)
Staples	Debit	09/09/13	\$362.48	(1)
NYC Taxi	Debit	09/10/13	\$14.88	(1)
NYC Taxi	Debit	09/10/13	\$8.62	(1)
Domino's	Debit	09/10/13	\$59.36	(1)
NYC Taxi	Debit	09/11/13	\$9.50	(1) (2)
B T 99 Cents Plus	Debit	09/11/13	\$26.10	(1) (2)
Shell Oil	Debit	09/11/13	\$69.41	(1) (2)
Unknown	ATM Withdrawal	09/11/13	\$40.00	(1) (2)
NYC Taxi	Debit	09/12/13	\$1.00	(1) (2)
Shell Oil	Debit	09/13/13	\$158.59	(1) (2)
Law office of Ali	Debit	09/17/13	\$4,000.00	(1) (2)
Unknown	1256	09/19/13	\$405.00	(1) (2)
Unknown	1257	09/23/13	\$120.00	(1) (2)
Unknown	1258	09/23/13	\$400.00	(1) (2)
NYC Taxi	Debit	09/23/13	\$45.00	(1) (2)
Unknown	1261	09/27/13	\$1,000.00	(1) (2)
Unknown	1199	09/30/13	\$750.00	(1) (2)
Unknown	1200	09/30/13	\$1,000.00	(1) (2)
Unknown	1233	09/30/13	\$250.00	(1) (2)
Unknown	1234	09/30/13	\$250.00	(1) (2)
Unknown	1263	09/30/13	\$850.00	(1) (2)
<b>Total</b>			<b><u>\$34,568.41</u></b>	

**Notes:**

(1) See also Finding #1b.

(2) Although these expenditures include paid dates after the primary election, they are being attributed to the primary election because the Campaign failed to respond to the Draft Audit Report and demonstrate the period to which they pertain.

**Exhibit VIId**  
**Zead Ramadan 2013**  
**Misreported Transactions**  
**(see Finding #11d)**

<b>Payee</b>	<b>Account</b>	<b>Check No./ Transaction</b>	<b>Date</b>	<b>Amount</b>	<b>Correct Amount</b>	<b>Difference</b>
Consolidate Edison of New York	9020	Debit	09/05/13	\$485.00	\$500.00	\$15.00