



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

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January 14, 2016

By First Class Mail and C-ACCESS

Inez Dickens

[REDACTED]

Delores Richards
Dickens NYC 2013

[REDACTED]

Dickens NYC 2013

[REDACTED]

Laurence Laufer, Esq.
Kantor Davidoff Mandelker Twomey Gallanty & Kesten P.C.

[REDACTED]

FINAL BOARD DETERMINATION – EC2013 CAMPAIGN

The New York City Campaign Finance Board (“Board”), at a meeting held on January 14, 2016, made the following final determination concerning the Inez Dickens 2013 Campaign (“Campaign”):

The Board determined that the Candidate, the Treasurer, and the Committee named above violated the New York City Campaign Finance Act (“Act”) and Board Rules and are jointly and severally liable for paying \$3,500 in penalties as follows:

1. A penalty of \$100 for filing a late disclosure statement. *See* N.Y.C. Charter § 1052(a)(8); Admin. Code §§ 3-703(6), (12), 3-708(8), 3-719(1); Board Rules 1-

Candidate ID Number: 867-NP

09, 3-02. The Campaign filed Statement 12, due September 20, 2013, two days late. The Board assessed a penalty of \$50 per day late.

2. A penalty of \$50 for failing to demonstrate compliance with subcontractor reporting and documentation requirements. *See* Admin. Code §§ 3-703(1)(d), (g), (6), (11), 3-719(1); Board Rules 3-03(e)(3), 4-01(h). The Campaign did not report or properly document subcontractors used by Morningside Solutions (paid \$11,489.73), nor did it provide documentation of its attempts to contact the vendor.

3. A penalty of \$2,500 for accepting over-the-limit contributions. *See* Admin. Code §§ 3-702(8), (18), (20), 3-703(1-a), (1-b), (1)(f), (11), 3-719(2); Board Rules 1-04(c)(1), (h), 1-07(c). The Campaign accepted three over-the-limit contributions and seven over-the-limit doing business contributions. The Campaign refunded each of the contributions after the deadline set by the CFB in its notification of the violations. The Board assessed a penalty of \$250 per contribution.

4. A penalty of \$300 for accepting contributions from corporations, limited liability companies, or partnerships. *See* N.Y.C. Charter § 1052(a)(13); Admin. Code §§ 3-702(8), 3-703(1)(l), 3-719(2)(b); Board Rules 1-04(c)(1), (e), (g), 1-05. The Campaign accepted a \$100 contribution from 103 East 125th St Realty Corp on June 8, 2012 and a \$100 contribution from Seven Brown on December 17, 2012. The Campaign refunded both contributions after the deadline. The Board assessed penalties of \$150 each (in each instance representing \$50 plus the amount of the contribution).

5. A penalty of \$200 for failing to document transactions. *See* Admin. Code §§ 3-703(1)(d), (g), (11), (12), 3-715, 3-719(1)(b); Board Rules 1-09, 4-01(a), (c), (g), (k), 4-03. The Campaign reported, but failed to adequately document, in-kind contributions of \$932.53 and \$500, both on May 20, 2013. The Board assessed a penalty of \$100 per transaction.

6. A violation, no penalty for failing to demonstrate compliance with intermediary reporting and documentation requirements. *See* Admin. Code §§ 3-703(1)(d), (g), (6), (11), 3-719(1); Board Rules 3-03(c)(7), 4-01(b)(5). The Campaign did not submit an intermediary affirmation statement for Deryl McKissack. The Board found a violation but did not assess a penalty because the intermediated contributions totaled less than \$500.

7. A penalty of \$350 for a late response to audit documentation and information requests. *See* Admin. Code §§ 3-703(1)(d), (g), (6), (11), (12), 3-708(5), 3-710(1), 3-719(1)(b); Board Rules 1-09(a), 4-01, 4-05(a). The Campaign responded to the Initial Documentation Request on March 31, 2014, seven days after the March 24, 2014 deadline. The Board assessed a penalty of \$50 per day late.

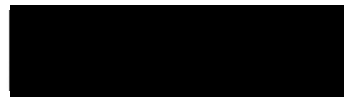
You must pay to the Board the full amount due of \$3,500 no later than **June 9, 2016**. Checks should be made payable to the “New York City Election Campaign Finance Fund,” and mailed to the attention of Bethany M. Perskie, Senior Associate

Counsel, New York City Campaign Finance Board, 100 Church Street, 12th Floor, New York, NY 10007 or delivered to the offices of the Board.

If the Board is not in receipt of the full \$3,500 by **June 9, 2016**, the candidate's name and the unpaid amount will be posted on the Board's Website and the Board may initiate a civil action against the Committee, the Candidate, and the Treasurer to compel payment. In addition, you will be ineligible for public funds in any future election until this debt is paid in full.

You may challenge this final determination, within four months, in the New York State Supreme Court pursuant to Article 78 of the Civil Practice Law and Rules.

If you need additional time to pay this amount or if you have any questions concerning this Final Board Determination, please contact Bethany M. Perskie, Senior Associate Counsel, at (212) 409-1861 or bperskie@nyccfb.info.



Signature on
original

Sue Ellen Dodell
General Counsel

**NEW YORK CITY
CAMPAIGN FINANCE BOARD**

SED/BMP