



**New York City Campaign Finance Board**  
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June 18, 2019

**By First Class Mail and C-ACCESS**

Zead Ramadan

[REDACTED]  
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**FINAL BOARD DETERMINATION – EC2013 CAMPAIGN**

The New York City Campaign Finance Board (“Board”), at a meeting held on May 16, 2019, made the following final determination concerning the Zead Ramadan 2013 Campaign (the “Campaign”):<sup>1</sup>

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<sup>1</sup> The Board previously issued a determination assessing violations, penalties, and a public funds repayment for this campaign on October 23, 2015, and a Final Audit Report was issued on September 30, 2016. Due to a series of unique events, the Board and the Campaign agreed to reopen the audit, and the Board issued this new and final determination.

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 liable for paying \$7,647 in penalties as follows:

1. A penalty of \$641 for failing to report transactions. *See* Admin. Code §§ 3-703(1)(d), (g), (6), (11), (12); Board Rules 1-09, 3-03(c), (d), (e), 4-01. The Campaign did not report transactions totaling \$32,068.18 that appeared on its bank statements. The Campaign misreported advance purchases by an employee in the amounts of \$197.22 on April 19, 2013 and \$50 on August 16, 2013, for wireless internet and car service, respectively. The Board assessed a penalty of 2% of the amount of the transactions exceeding \$50.

2. A penalty of \$2,500 for failing to demonstrate compliance with reporting requirements for receipts and disbursements. *See* Admin. Code §§ 3-703(1)(d), (g), (6), (11), (12); Board Rules 1-09, 3-03(c), (d), (e), 4-01. The Campaign reported total monetary receipts of \$183,482, but its bank statements reflect credits totaling \$194,754.48. This constitutes a reporting variance of \$11,272.48 (-6.14%). The Campaign reported total monetary disbursements of \$156,001.96, but its bank statements reflect debits totaling \$188,823.53. This constitutes a reporting variance of \$32,821.57 (-21.04%). The Board assessed penalties of \$500 for the receipts variance and \$2,000 for the disbursements variance.

3. A penalty of \$100 for filing late disclosure statements. *See* N.Y.C. Charter § 1052(a)(8); Admin. Code §§ 3-703(6), (12), 3-708(8); Board Rules 1-09, 3-02. The Campaign filed both Statement 9 (due July 15, 2013) and Statement 10 (due August 9, 2013) one day late. The Board assessed penalties of \$50 per day late.

4. A penalty of \$200 for failing to demonstrate compliance with subcontractor reporting requirements. *See* Admin. Code §§ 3-703(1)(d), (g), (6), (11); Board Rules 3-03(e)(3), 4-01(h). The Campaign did not report subcontractors used by Bravo Print and Mail (paid \$13,097) or Bill Lynch Associates (paid \$17,500). The Campaign did not provide documentation indicating that it attempted to obtain subcontractor forms from these vendors or determine whether they used subcontractors. The Board assessed penalties of \$100 per vendor.

5. A penalty of \$250<sup>2</sup> 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); Board Rules 1-04(c)(1), (e), (g), 1-05. The Campaign accepted a \$500 contribution from Nassef F. Hassan Physician, P.C. on March 8, 2013. The deadline to refund the contribution was August 6, 2013. The Campaign refunded the contribution on August 9.

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<sup>2</sup> The Board mistakenly voted on a penalty recommendation amount of \$500 for this violation. According to the Board’s 2013 Penalty Guidelines, the standard penalty for this violation is \$250.

6. A penalty of \$250 for accepting a contribution from an unregistered political committee. *See* Admin. Code §§ 3-702(11), 3-703(1)(k), 3-707; Board Rules 1-04(c)(1), (d), (g), 1-05. On July 31, 2013, the Campaign accepted a \$500 contribution from Arab American Leadership PAC, which was not registered as a political committee. The deadline to refund the contribution was August 21, 2013. The Campaign refunded the contribution on August 30.

7. A penalty of \$200 for failing to document transactions. *See* Admin. Code §§ 3-703(1)(d), (g), (11), (12), 3-715; Board Rules 1-09, 4-01(a), (c), (g), (k), 4-03. The Campaign reported but failed to adequately document five in-kind contributions. The Campaign also failed to document a joint expenditure for a palm card with the campaigns of Letitia James and John Liu. The Board assessed penalties of \$100 for the in-kind contributions and \$100 for the joint expenditure.

8. A penalty of \$1,644 for making cash expenditures greater than \$100. *See* Board Rules 1-08(i) and 4-01(e)(2). The Campaign made cash withdrawals in excess of \$100 totaling \$16,441.50. In the absence of reporting or documentation, the CFB identified those withdrawals exceeding \$100 as disbursements. The Board assessed a penalty of 10% of the amount of the expenditures.

9. A penalty of \$1,862 for failing to demonstrate that spending was in furtherance of the campaign. *See* Admin. Code §§ 3-702(21)(a), (b); 3-703(1)(d), (g), (6), (11); Board Rules 1-03(a), 4-01(e).

The Campaign provided a copy of a consultant agreement with the treasurer, stating that he would be compensated \$750 on a bi-weekly basis from February 1, 2013 until the end of the primary election. Thus, under the contract, the treasurer should have been paid \$11,250, but the Campaign paid him a total of \$15,200 (including a \$500 payment on January 22, 2013, which was outside the period covered in the contract). The Campaign thus paid the treasurer \$3,950 more than the contracted amount.

The Campaign provided a copy of a consultant agreement with another employee stating that he would be compensated \$1,000 on a bi-weekly basis from February 1, 2013 until the end of the primary election. Thus, under the contract, the employee should have been paid \$15,000, but the Campaign paid him a total of \$15,500 (including a \$500 payment on January 22, 2013, which was outside the period covered in the contract). The Campaign thus paid the employee \$500 more than the contracted amount.

The Campaign reported a \$1,000 expenditure to an individual on February 27, 2013, as well as payments to another individual totaling \$2,000, for which it did not provide a contract or any other documentation.

The Board assessed a penalty of 25% of the amount of the expenditures.

**The Board determined that the amount due is \$7,647.**

You must pay to the Board the full amount due of **\$7,647** no later than **July 18, 2019**. Checks should be made payable to the “New York City Election Campaign Finance Fund,” and mailed to the attention of Bethany Perskie, Deputy General Counsel, New York City Campaign Finance Board, 100 Church Street, 12<sup>th</sup> Floor, New York, NY 10007 or delivered to the offices of the Board.

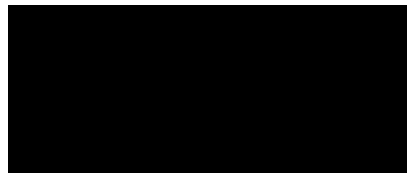
If the Board is not in receipt of the full \$7,647 by July 18, 2019, the candidate’s name and the unpaid amount will be posted on the Board’s Website and the Board may initiate a civil action against the Committee, the Candidate, and the Treasurer to compel payment. In addition, you will be ineligible for public funds in any future election until this debt is paid in full.

**The Campaign will receive a Final Audit Report containing additional information regarding the matters listed herein, as well as any audit-only findings, which are not associated with any violation and are thus not included in this determination.**

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 Perskie, Deputy General Counsel, at (212) 409-1861 or [BPerskie@nyccfb.info](mailto:BPerskie@nyccfb.info).

Signature on original



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Hillary Weisman  
General Counsel

**NEW YORK CITY  
CAMPAIGN FINANCE BOARD**