



Summary of Final Board Determination

Christine Quinn

Candidate, 2013, Mayor

Program participant: \$3,534,300 in public funds received

1. Failing to report bank accounts used for campaign purposes \$750

Campaigns are required to establish and maintain a separate campaign bank account and to report all bank, merchant, and depository accounts used for campaign purposes. *See* Admin. Code §§ 3-703(1)(c), (d), (g), (6), (10), (11); Board Rules 1-11(d), 2-06, 4-01(f).

The Campaign failed to disclose two American Express accounts, and an EMPS account, which were used in furtherance of the campaign.

The Board assessed a penalty of \$750 for these violations.

2. Failing to provide bank/merchant account statements \$500

Campaigns are required to provide copies of all bank and merchant account statements for accounts used for each election. *See* Admin. Code §§ 3-703(1)(d), (g), (11); Board Rule 4-01(f).

The Campaign failed to provide the bank and merchant account statements listed below.

Bank	Statement Period
Citibank	Jun. 2015 – Present
Citibank, N.A.	Jan. 2014, Jun. 2015 – Present
Citibank	Nov. 2013 – Present
American Express	Inception – Present
EMPS	Inception – Present
American Express	Inception – Present

The Board assessed a penalty of \$500 for these violations.

3. Failing to report transactions \$297

Campaigns are required to properly report all financial transactions to the Board. *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 debits totaling \$14,963.49 and credits totaling \$62.45. Additionally, the Campaign did not report the vendor for an advance repayment of \$137.76 to an individual.

The Board assessed a penalty of \$297 for these violations.



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4. Accepting over-the-limit contributions \$5,425

Campaigns are prohibited from accepting contributions in excess of the applicable contribution limit. *See* Admin. Code §§ 3-702(8), 3-703(1)(f), (11); Board Rules 1-04(c)(1), (h), 1-07(c). In addition, campaigns may not accept contributions in excess of the “doing business” contribution limits from individuals or entities that have business dealings with the City: \$400. *See* Admin. Code §§ 3-702(8), (18), (20), 3-703 (1-a), (1-b); Board Rules 1-04(c)(1), (h).

The Campaign accepted 25 over-the-limit contributions. It refunded the over-the-limit portion of 18 contributions timely, and the remaining ones after the deadline. The Campaign also accepted three over-the-limit Doing Business contributions, and refunded the over-the-limit portion of the contributions after the deadline.

The Board assessed a penalty of \$5,425 for these violations.

5. Accepting contributions from corporations, limited liability companies, or partnerships \$1,962

Campaigns may not accept, either directly or by transfer, a campaign contribution or loan, or guarantee or other security for such loan, from any corporation, limited liability company (LLC), or partnership. *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. Creditors who extend credit beyond 90 days are considered to have made a contribution equal to the credit extended, unless the creditor continues to seek payment of the debt. Outstanding liabilities that are forgiven or settled for less than the amount owed are also considered contributions. *See* Board Rules 1-04(g)(4), (5).

The Campaign accepted four corporate contributions, two of which were refunded timely, and two of which were refunded after the deadline.

The Campaign reported expenditures of \$177.90 to Able Rentals Inc. and \$535 to Terra Luna Catering that do not appear on the Campaign’s bank statements, nor are they reported as outstanding liabilities, indicating that the debts were forgiven or paid by a third party.

The Board assessed a penalty of \$1,962 for these violations.

6. Accepting contributions from unregistered political committees \$975

Campaigns may not accept a contribution from a political committee unless the political committee is registered with the CFB or registers with the CFB within 10 days of receipt of the contribution. *See* Admin. Code §§ 3-702(11), 3-703(1)(k), 3-707; Board Rules 1-04(c)(1), (d), (g), 1-05.



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The Campaign accepted contributions from Friends of Joe Roberts, Irish American Democrats, Joseph Divincenzo for County E, Local 102 PAC, and Vince Ryan for Attorney. Four of them were refunded timely, and two were refunded after the deadline.

The Board assessed a penalty of \$975 for these violations.

7. Failing to document transactions \$502

Campaigns are required to document all financial transactions, including loans, in-kind contributions, and joint expenditures. *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 a \$2,000 outstanding liability to the Hearst Organization on April 11, 2013, but did not report the liability as still outstanding on subsequent disclosure statements, nor did it report a payment of the liability, indicating that the debt may have been forgiven or paid by a third party. The Campaign reported four other expenditures that do not appear on its bank statements, nor are they reported as outstanding liabilities, indicating that the expenditures were paid for by a third party or that the debts were forgiven by the vendors.

The Board assessed a penalty of \$502 for these violations.

8. Failing to demonstrate compliance with intermediary reporting and documentation requirements \$3,200

Campaigns are required to report the intermediary for each contribution that was delivered or solicited by an intermediary. In addition, campaigns are required to provide a signed intermediary affirmation statement for each intermediated contribution. *See* Admin. Code §§ 3-703(1)(d), (g), (6), (11); Board Rules 3-03(c)(7), 4-01(b)(5).

The Campaign failed to provide intermediary affirmation statements for 24 reported intermediaries; failed to provide intermediary statements for 32 reported intermediated contributions; and failed to report 30 contributions that were listed on intermediary statements.

The Board assessed a penalty of \$3,200 for these violations.