



Summary of Final Board Determination

Ruben Wills

Candidate, 2013, City Council District 28, Queens

Program participant: \$84,030 in public funds received

1. Failing to report transactions \$50

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 failed to report returns of funds in the amounts of \$100 and \$2,300, as well as a \$53.26 credit from Radio Shack that appear on its bank statements.

The Campaign reported a \$50 expenditure to Hall of Fame Studios, but the payment for the expenditure does not appear on the Campaign's bank statements, indicating an unreported in-kind contribution from the vendor or a third party.

The Board assessed a penalty of \$50 for these violations.

2. Failing to file daily pre-election disclosure statements \$150

Aggregate contributions and loans from a single source in excess of \$1,000, and aggregate expenditures in excess of \$20,000, received or made within 14 days of an election, must be disclosed to the Board within 24 hours. *See* Admin. Code §§ 3-703(6), (12), 3-708(8); Board Rules 1-09, 3-02(e).

The Campaign failed to file the required daily disclosure statements for seven expenditures totaling \$41,216.95 to Connective Strategies LLC.

The Board assessed a penalty of \$150 for these violations.

3. Accepting contributions from corporations, limited liability companies, or partnerships \$510

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)(1); 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).



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The Campaign accepted an in-kind contribution valued at \$260 from Mike's Print.com for 1,000 posters, based on a charged rate of \$.90 per poster (amounting to \$900 for the total order) rather than the reported rate of \$1.16 per poster (amounting to \$1,160 for the total order).

The Board assessed a penalty of \$510 for this violation.

4. Failing to demonstrate compliance with intermediary reporting and documentation requirements \$100

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 did not report an intermediary for 18 contributions totaling \$1,750, all of which were made on the same day.

The Board assessed a penalty of \$100 for this violation.