



Summary of Final Board Determination

Jumaane Williams

Candidate, EC2017, City Council District 45

Program non-participant

Joan M. Alexander-Bakiriddin, Treasurer of Jumaane 2017

Campaign Summary

Candidate	Jumaane Williams
Office Sought/ Election Cycle	City Council District 45, Brooklyn EC2017 primary and general elections
Committee	Jumaane 2017
Treasurer	Joan M. Alexander-Bakiriddin
Net Receipts	\$227,149 (net contributions, \$227,149; public funds, \$0)
Net Expenditures	\$222,799

Penalties Summary

Violation	Penalty
1. Failing to report transactions	Violation; No Penalty
2. Filing late disclosure statements	\$200
3. Accepting over-the-limit contributions	\$10,860
4. Accepting contributions from corporations, limited liability companies, or partnerships	\$610
5. Accepting a contribution from an unregistered political committee	\$300
6. Commingling campaign funds with funds accepted for a different election	\$250
7. Filing a late response to the Draft Audit Report	\$454
Total Recommended Penalties	\$12,674

The Board determined that the Campaign failed to comply with the Campaign Finance Act and Board rules, and assessed violations and penalties as detailed below.

I. Failing to report transactions

**Violation; No
Penalty**

Campaigns are required to report all financial transactions in disclosure statements filed according to the schedule provided by the Board. *See* Admin. Code §§ 3-703(1)(d), (g), (6), (11), (12), 3-719(1); Board Rules 1-09, 3-02, 3-03(a), (c), (d), (e), 4-01.

The Campaign failed to timely report transactions totaling \$2,139.44 that appeared on its bank statements.

The Board did not assess a penalty for these violations.

2. Filing late disclosure statements

\$200

Campaigns are required to file complete and timely disclosure statements on scheduled dates. *See* N.Y.C. Charter § 1052(a)(8); Admin. Code §§ 3-703(6), (12), 3-708(8), 3-719(1); Board Rules 1-09, 3-02.

The Campaign filed Disclosure Statement 12 (due September 22, 2017) one day late, and Disclosure Statement 14 (due October 27, 2017) three days late.

The Board assessed total penalties of \$200 for these violations.

3. Accepting over-the-limit contributions

\$10,860

Campaigns are prohibited from accepting contributions (monetary or in-kind) in excess of the applicable contribution limit. *See* Admin. Code §§ 3-702(8), 3-703(1)(f), (11), 3-719(2); 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: \$250 (for candidates for City Council). *See* Admin. Code §§ 3-702(8), (18), (20), 3-703 (1-a), (1-b), 3-719(2); Board Rules 1-04(c)(1), (h).

The Campaign accepted and failed to document refunds for three over-the-limit contributions. Additionally, the Campaign accepted seven over-the-limit doing business contributions that it refunded after the deadline, and three over-the-limit doing business contributions for which it failed to timely document a refund.

The Board assessed total penalties of \$10,860 for these violations.

4. Accepting contributions from corporations, limited liability companies, or partnerships

\$610

Campaigns may not accept a campaign contribution 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), 3-719(2)(b); Board Rules 1-04(c)(1), (e), (g), 1-05.

The Campaign accepted and failed to document refunds of contributions in the amounts of \$10 from Never Sink Media LLC and \$100 from Kenneth J. Montgomery, PLLC, both of which are listed on the New York State Department of State’s website as corporations, partnerships, and/or LLCs.

The Board assessed total penalties of \$610 for these violations.

5. Accepting a contribution from an unregistered political committee **\$300**

Campaigns may not accept a contribution (monetary or in-kind) 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, 3-719(2)(b); Board Rules 1-04(c)(1), (d), (g), 1-05.

The Campaign accepted and failed to refund a \$50 contribution from Committee to Elect PFC, an unregistered political committee.

The Board assessed a penalty of \$300 for this violation.

6. Commingling campaign funds with funds accepted for a different election **\$250**

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), 3-719(1); Board Rules 1-11(d), 2-06, 4-01(f). Campaigns are prohibited from commingling campaign funds with personal or business funds or funds accepted for another election. *See* Board Rules 2-06(b), (e).

The Campaign deposited receipts totaling \$2,400 intended for the 2017 election cycle into the Candidate's 2013 committee account.

The Board assessed a penalty of \$250 for this violation.

7. Filing a late response to the Draft Audit Report **\$454**

Campaigns are required to maintain records, such as copies of checks, invoices, and bank records, to verify financial transactions reported in disclosure statements, and campaigns are required to provide such records to the Board upon request and to respond to specific questions regarding compliance with the Act and Rules. *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 Board will not accept any document, or any part thereof, that is illegible. *See* Board Rule 1-09(b).

The Campaign's response to the Draft Audit Report was due on August 17, 2018. On that day, the Campaign submitted an illegible response. The response was not deemed submitted until a legible version was received on August 31, 15 days late.

The Board assessed a penalty of \$454 for this violation.