



Summary of Final Board Determination

Costa Constantinides

Candidate, 2013, City Council District 22

Program participant: \$180,180 in public funds received

1. Failing to provide 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 did not provide November-December 2014 statements for its Little & Co. merchant account, or any statements from its PayPal merchant account.

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

2. Accepting over-the-limit contributions \$500

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; for candidates for City Council, this limit is \$250. See Admin. Code §§ 3-702(8), (18), (20), 3-703 (1-a), (1-b); Board Rules 1-04(c)(1), (h).

The Campaign accepted contributions in excess of the doing business limit from two individuals. The Campaign refunded the over-the-limit portion of both contributions after the statutory deadline.

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

3. Accepting a contribution from an unregistered political committee \$450

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.

The Campaign accepted a \$200 contribution from Local 808 Political Action & Education Fund, which is not registered with the CFB, and the refund it issued was not prompt.

The Board assessed a penalty of \$450 for this violation.



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4. Making impermissible post-election expenditures \$493

After an election and before repaying leftover campaign funds to the Board, participants may spend campaign funds only to pay campaign-related expenses incurred in the preceding election and for “routine activities involving nominal cost associated with winding up a campaign and responding to the post-election audit.” See Admin. Code §§ 3-702(21)(a)(8), 3-703(1)(d), (g), (6), (11), 3-710(2)(c); Board Rules 1-03(a), 1-08(b), 5-03(e)(2).

The Campaign made impermissible post-election expenditures totaling \$1,973.66.

The Board assessed a penalty of \$493 for these violations.