



Summary of Final Board Determination

Lenford Edie

Candidate, 2013, 12 Bronx

Program participant: \$0 in public funds received

1. Failing to demonstrate compliance with reporting requirements for receipts and disbursements. \$750

The Campaign reported \$9,454 in receipts, but the bank statements the Campaign has provided only account for \$7,394 in receipts, a difference of \$2,060. This constitutes a variance of 21.79% between the receipts reported and documented by the Campaign.

The Campaign reported \$8,895.59 in disbursements, but the bank statements the Campaign has provided only account for \$7,440.75 in disbursements, a difference of \$1,454.84. This constitutes a variance of 16.35% between the disbursements reported and documented by the Campaign.

The Board assessed penalties totaling \$750 for these violations.

2. Failing to document transactions. \$500

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 three expenditures totaling \$1,500 to its Campaign Manager. However, payment for these expenditures does not appear in the Campaign's bank records. As such, it appears that the Campaign Manager provided her services free of charge as an in-kind contribution that the Campaign failed to document or report.

During a September 2, 2013 site visit, the Campaign indicated to Board staff that four individuals were paid employees of the Campaign. However, the Campaign did not report any wage payments to these individuals, nor do any such payments appear in the Campaign's bank records. The Campaign failed to provide any documentation from the individuals confirming whether they were paid employees or volunteers. It appears that these individuals were paid employees who ultimately provided their services as in-kind contributions that the Campaign failed to document or report.

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



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3. Failing to report and document basic campaign functions/activities. \$500

Campaigns are required to report and document all financial transactions, including basic categories of expenditures such as postage, printing, rent, and petitioning. *See* Admin. Code §§ 3-702(8), 3-703(1)(d), (g), (6), (11), (12); Board Rules 1-02, 1-04(g), 1-08(a), (b), (c), (h), 1-09, 3-02, 3-03(e), 4-01.

The Campaign did not report expenditures for petitioning, and failed to document or explain why it did not report any other expenditures associated with petitioning (such as wages for petitioners or printing costs).

The Board assessed a penalty of \$500 for this violation.

4. Maintaining a petty cash fund greater than \$500. \$150

Campaigns are prohibited from maintaining more than \$500 in a petty cash fund. *See* Board Rule 4-01(e)(2).

The Campaign reported receiving a \$2,000 cash loan on April 10, 2013. The deposit of this amount of cash does not appear in the Campaign's bank records, and the Campaign therefore kept more than \$500 in cash.

The Board assessed a penalty of \$150 for this violation.