



## **Summary of Final Board Determination**

### **Debra Cooper**

**Candidate, 2013, City Council District 6, Manhattan  
Program participant: \$92,400 in public funds received**

**1. Accepting over-the-limit contributions. \$125**

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). A loan not repaid by the day of the election is considered a contribution subject to the contribution limit.

Under the Act, Cooper was permitted to contribute up to three times the \$2,750 limit, or \$8,250, to her campaign. *See* Admin. Code § 3-703(1)(h). Cooper made six contributions totaling \$8,250, as well as a \$1,000 loan, to the Campaign. The loan was repaid in December, after the election. Therefore Cooper exceeded the contribution limit by \$1,000.

The Board assessed a penalty of \$125 for this violation.

**2. Failing to document a transaction. \$100**

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 receiving a \$1,000 loan from Cooper on March 11, 2013, and reported repaying her on December 23, 2013, but failed to submit documentation for the loan.

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

**3. Accepting a contribution from unregistered political committees. \$125**

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.

On May 14, 2013, the Campaign accepted a \$500 contribution from Gwen Moore for Congress (“GMC”), a political committee that was not registered with the CFB. After notification from the CFB, the Campaign refunded the contribution.

The Board assessed a penalty of \$125 for this violation.



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### **4. Making an impermissible post-election expenditure. \$250**

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).

After the election, the Campaign paid its campaign manager an additional \$2,000. This payment was not provided for in the contract, or otherwise documented, and therefore is a bonus for previously performed work.

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