



Summary of Final Board Determination

Joseph Lhota

Candidate, 2013, Mayor

Program participant: \$3,128,034 in public funds received

1. Failing to file daily pre-election disclosure statements \$350

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 disclosures for a contribution of \$1,085.04 and expenditures totaling \$60,337.77.

The Board assessed a penalty of \$350 for these violations.

2. Accepting contributions from corporations, limited liability companies, or partnerships \$950

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.

The Campaign accepted contributions from corporations, LLCs, and/or partnerships totaling \$1,500 and timely refunded each contribution.

The Board assessed a penalty of \$950 for these violations.

3. Failing to document transactions \$846

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, but failed to adequately document, in-kind contributions totaling \$42,300.75. For a number of contributions, the Campaign submitted duplicate or illegible documentation. For the remaining contributions, the Campaign failed to provide sufficient documentation, specifically invoices or receipts.

The Board assessed a penalty of \$846 for these violations.



Summary of Final Board Determination

4. Failing to demonstrate compliance with intermediary reporting and documentation requirements \$700

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).

Certain transactions appearing on the Campaign's intermediary statements were not reported as intermediated. Additionally, certain transactions reported as intermediated by an individual do not appear on the Campaign's intermediary statements.

The Board assessed a penalty of \$700 for these violations.