



New York City Campaign Finance Board
100 Church Street, 12th Floor, New York, NY 10007
212.409.1800 | www.nyccfb.info

Via C-Access
August 22, 2019

Margaret Chin
Margaret Chin 2017 TIE



Dear Margaret Chin:

The New York City Campaign Finance Board (the “Board” or “CFB”) has completed its review of your 2017 Transition and Inauguration Entity (the “TIE”) in conjunction with the CFB’s audit of your 2017 campaign (the “Campaign”). Two TIE-related issues were noted.

The TIE employed as its treasurer Shiang Liu, who had served as the manager of the Campaign. Mr. Liu was paid the same monthly wage by the TIE as he had been by the Campaign, despite having significantly fewer responsibilities. The total wages of \$11,000 paid to Liu by the TIE was more than twice the amount paid by any other Councilmember’s TIE to an individual staff member, and more than the total amount paid by any other Councilmember’s TIE to all of its staff combined.

However, the Board Rules place no specific limits on amounts paid to TIE staff. Therefore, while these payments raise concerns about whether the compensation was related to the activities of the Campaign rather than the TIE, particularly since the Campaign exceeded the expenditure limit, no further action will be taken.

Similarly, the TIE’s overall spending raises questions about the purpose of its expenditures, as very little was spent on the inaugural event. Excluding salaries and overhead, the amount spent on the inaugural event was between \$860 and \$1,389, while the amount spent fundraising was between \$5,480 and \$6,009 (a \$529 expenditure could not be categorized based on the TIE’s reporting). To conduct these activities, the TIE spent \$12,500 on staff (\$11,000 to Liu) and \$2,073 for overhead. In total, \$22,541 was raised and spent in order to put on an inauguration that cost at most \$1,389. The cost of fundraising far exceeded the cost of the event for which the money was being raised.

Notwithstanding these issues, the CFB has determined that the TIE demonstrated substantial compliance with the Campaign Finance Act and Board Rules, based on a review of the documentation and information submitted by the TIE. This concludes the CFB’s review of the TIE and a response to this letter is not required. Please ensure that the TIE closes its bank account if it has not done so already. Note that the TIE is required to maintain its records for six years from the date of its registration.

Thank you for your cooperation throughout this process.

Sincerely,



Jesse Schaffer
Director of Special Compliance

SIGNATURE ON ORIGINAL