



**New York City  
Campaign Finance Board**

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December 19, 2007

John W. Burns  
Friends of Bill de Blasio 2005

Dear Mr. Burns:

Attached please find the New York City Campaign Finance Board's (the "Board") final audit report for the 2005 election campaign of Bill de Blasio (the "Campaign"). This report is based on a comprehensive review of the Campaign's financial disclosure statements and submitted documentation. As noted in the Conclusions section of the attached report, the Campaign failed to adhere fully to certain Campaign Finance Program requirements.

Because the Campaign has not reported extinguishing all liabilities from the 2005 election, all other Program requirements, including contribution limits, remain in effect for activity related to that election. Please be advised that the Board may in the future require the Campaign to submit relevant information and proof of ongoing compliance with the 2005 election requirements. See Campaign Finance Board Rules 3-02(b) and 4-01(a).

As a result of actions taken by the Board, \$937 in penalties have been assessed against the Campaign which are delineated in the report and attached Board Determination letter. Checks should be made payable to the "New York City Election

December 19, 2007

Campaign Finance Fund.” If the Board is not in receipt of the full \$937 by **January 18, 2008**, Bill de Blasio’s name and the amount of unpaid penalties will be posted on the Board’s Web site. The Board may also initiate a civil action to compel payment. In addition, the candidate and any principal committee he authorizes will not be eligible to receive public funds for a future election until the full amount is paid.

If you have any questions regarding filing disclosure statements for future elections, please call the Candidate Services Unit at 212-306-7100.

The Board and its staff would like to thank you and the Campaign staff for your cooperation during the 2005 election cycle. Should you have any questions about the enclosed report, please call me at 212-306-7123.

Sincerely,



Julius Peele  
Director of Auditing and Accounting

Attachments

c: Bill de Blasio

Laurence D. Laufer  
Genova, Burns & Vernoia

**CAMPAIGN FINANCE BOARD  
FINAL AUDIT REPORT OF  
FRIENDS OF BILL DE BLASIO 2005**

**BACKGROUND**

The Campaign Finance Program (the “Program”) was designed to limit the role and influence of private money in the political process. Candidates who voluntarily participate in the Program can qualify to have private contributions matched with public money. In exchange, the participants agree to full disclosure of their campaign finances, as well as to strict contribution and spending limits.

In December 2004, the City Council passed legislation expanding the jurisdiction of the Board to all candidates running for Mayor, Public Advocate, Comptroller, Borough President and City Council. Program participants and non-participants alike are required to disclose all campaign activity to the Board. In addition, all candidates must adhere to the contribution limits and the ban on corporate contributions. Non-participants are not eligible to receive public funds and are not subject to the expenditure limits.

The table below provides detailed information about the candidate:

Name: Bill de Blasio	ID: 326		
Office Sought: City Council	District: 39		
Class: Participant			
Certification Date: May 31, 2005	Contribution Limit:	\$2,750	
Public Funds Received: \$0	Expenditure Limit:		
Public Funds Returned: N/A	2002-2003	\$3,000	
5 for 1 Matching	2004	\$40,000	
Primary: N/A	2005 Primary	N/A	
General: No	2005 General	\$150,000	
Committee Name: Friends of Bill de Blasio 2005	Party: Democratic, Working Families		
Other Committees: No	Ballot Status: General		

## **REVIEW SCOPE AND OBJECTIVES**

Board staff performed an audit of the financial disclosure statements and books and records submitted by the Campaign. The audit covered the information disclosed in the Campaign's financial disclosure statements four through seventeen covering the period from July 12, 2003 through January 11, 2006. The audit also included a review of the Campaign's bank statements covering the period December 18, 2003 through July 19, 2006.

The objectives of the Board's audit were to ensure that (1) the contribution and expenditure limits and prohibitions were adhered to; (2) financial transactions were accurately reported and documented; and (3) adequate books and records were maintained by the Campaign to demonstrate compliance with the Campaign Finance Act and Campaign Finance Board Rules.

## CONCLUSIONS

The Board staff's review revealed that the functions carried out by the Campaign were properly documented and that the applicable rules were followed with the exception of the following items:

- The Campaign exceeded the applicable \$150,000 expenditure limit for the general election (see Finding #1). The Board assessed a \$687 penalty for this violation.
- The Campaign failed to report or inaccurately reported financial transactions to the Board (see Finding #2).
- The Campaign did not properly disclose credit card purchases (see Finding #3).
- The Campaign accepted a \$250 contribution on June 15, 2004 from an unregistered political committee: Arnie Kriss for Brooklyn DA. The contribution was refunded on August 1, 2005. On November 29, 2007, the Board assessed a \$125 penalty for this violation.
- The Campaign accepted contributions on July 9, 2004 and October 17, 2004 that exceeded the contribution limit by \$250 from the following contributor: Andrew Rasiej. The \$250 over the limit amount was refunded on August 1, 2005. On November 29, 2007, the Board assessed a \$125 penalty for this violation.

## **FINDINGS AND RECOMMENDATIONS**

### **1. EXPENDITURES – Exceeding the Legal Limit**

Program participants are limited in the amount of money they can spend on their campaigns. Expenditure limits curtail excessive campaign spending and level the playing field for candidates. An expenditure is considered to be made when the goods and services are received, used or rendered. Certain limited expenditures are exempt from the prescribed limits. *See* New York City Administrative Code §3-706, Rules 1-08(a), (b), (d), and (l). A determination that the Campaign has violated the expenditure limit may result in a conclusion by the Board that the Campaign is not eligible for optional public financing. *See* Administrative Code §§3-703(1), 3-705(1).

Board staff's review of the Campaign's disclosure statements and related bank statements found that the Campaign exceeded the 2005 general election expenditure limit by \$47,977.

### **Recommendation #1**

The Campaign must respond by indicating why it failed to comply with the expenditure limit. If the Campaign disagrees with the calculation, it must provide an explanation along with documentation such as invoices, contracts and/or consultant agreements to support its argument. The Campaign should address each line of the calculation. In addition, because the Campaign's exempt expenditure claims exceed 7.5%, the Campaign must document all of its exempt claims.

### **Campaign's Response**

In response to the draft audit report and the Notice of Alleged Violations and Proposed Penalties, the Campaign provided additional documentation for exempt claims, and amended its disclosure statements to correct reporting errors to decrease the amount it was over the expenditure limit. In addition, the Campaign argued that \$32,525 in contributions the Campaign made to other political committees and clubs in connection with the candidate's campaign for Council speaker were not made in connection with Mr. de Blasio's re-election campaign. At the November 29, 2007 Board meeting, the Campaign again argued that expenditures made in connection with the Council speaker race should not be included toward the expenditure limit. In addition, the Campaign argued that \$4,900 in expenditures paid to Strauss/Baker LLC were for compliance work and thus should be accepted as exempt expenditures. Further, the Campaign argued that the \$4,000 rent payment for November 2005 should be prorated to exclude \$2,933, the amount covering the 22 days in the month after the general election.

### **Board's Response**

Based on the Campaign's responses to the draft audit report and the Notice of Alleged Violations and Proposed Penalties, the amount the Campaign exceeded the expenditure limit was reduced to \$5,720. The Board accepted the Campaign's argument that \$2,100 of the \$4,900 paid to Strauss/Baker in 2005 should be exempt. However, \$2,800 of the \$4,900 (see Exhibit Ia) paid in 2004 was not accepted as exempt because the agreement covering these expenditures did not list any exempt tasks. In addition, the \$4,000 rent payment for November 2005 was prorated to exclude \$2,933, covering the 22

days after the general election. After these adjustments, the Campaign's expenditures over the general election expenditure limit were calculated to be \$687. See Exhibit I for details of the calculation. The Board assessed a \$687 penalty for this violation.

**2. FINANCIAL DISCLOSURE REPORTING – Discrepancies**

Campaigns are required to report every contribution, loan, and other receipt received, and every disbursement made. See New York City Administrative Code §3-703(6) and Rule 3-03. In addition, the Campaign is required to deposit all receipts into an account listed on the candidate's Certification. See Administrative Code §3-703(10) and Rule 2-06(a). The Campaign is also required to provide the Board with bank records, including periodic bank statements and deposit slips. See Administrative Code §§3-703(1)(d), (g), and Rules 4-01(a), (f).

a) The Campaign failed to report the following transactions:

<u>Name</u>	<u>Date</u>	<u>Amount Per Bank Statement</u>
Cingular Interactive	12/21/05	\$136
Cingular Wireless	12/21/05	\$113
Verizon Wireless	12/23/05	\$173
	<b>Total</b>	<b><u>\$422</u></b>

b) The Campaign reported the following transactions totaling \$30 that do not appear on its bank statements.

<u>Payee</u>	<u>Check No./ Transaction</u>	<u>Stmt/Sch/TransID</u>	<u>Date</u>	<u>Amount</u>
Gaspard, Kathleen	2165	10/F/R0002727	06/02/05	\$25
Cingular Wireless 00717	Debit	17/F/R0003267	09/02/05	\$5
			<b>Total</b>	<b><u>\$30</u></b>



c) The Campaign deleted transactions that were previously reported; four transactions totaling \$770 in 2004 and four transactions totaling \$1,536 in 2005 (see Exhibit II).

d) The Campaign did not properly report the following transactions:

<u>Name</u>	<u>Check No.</u>	<u>Stmt/Sch/TransID</u>	<u>Date</u>	<u>Amount Reported</u>	<u>Amount Per Bank Statement</u>	<u>Amount Under-Reported</u>
<b><u>For 2004:</u></b>						
AT&T	1054	6/F/R0001400	07/28/04	\$415	\$500	\$85
ATT Ws	Debit	17/F/R0003567	09/10/04	\$618	\$800	<u>\$182</u>
					<b>Total</b>	<b><u>\$267</u></b>
<b><u>For 2005:</u></b>						
de Blasio, Bill	2101	7/F/R0002163	03/04/05	\$236	\$531	\$295
ATT Ws	Debit	17/F/R0003586	11/01/05	\$11		
ATT Ws	Debit	17/F/R0003587	11/01/05	\$28		
ATT Ws	Debit	17/F/R0003588	11/01/05	<u>\$28</u>		
				\$67	\$99	<u>\$32</u>
					<b>Total</b>	<b><u>\$327</u></b>

**Recommendation #2**

The Campaign must compare information reported on its financial disclosure statements to supporting documentation for contributions and/or expenditures and bank statements to identify and explain the cited discrepancies. Additionally, for unreported transactions, the Campaign must both provide documentation and amend its disclosure statements to disclose the transactions. For checks cited as not appearing on bank statements, the Campaign must provide evidence to show that the check has cleared the bank (i.e., front and back of the check), was reported in error, or amend its disclosure statement to delete the transaction as an expenditure payment and report it as an in-kind contribution. For inaccurately reported transactions, the Campaign must amend its

disclosure statements to accurately report the transactions. For assistance with modifying transactions in C-SMART and submitting amendments, please call the Candidate Services Unit at 212-306-7100. Please note that any newly entered transactions will only appear as new transactions in an amendment to the last disclosure statement, even if the transaction dates are from earlier periods. Please also note that the Campaign must file an amendment for each disclosure statement in which transactions are being modified. Once all data entry is completed, the Campaign should run the Modified Statements Report in C-SMART to identify statements for which amendments must be submitted. If any new transactions have been added, the Campaign must amend statement seventeen.

**Campaign's Response**

- a) The Campaign stated that it had reported these transactions.
  
- b) The Campaign did not respond regarding the two transactions totaling \$30 that did not appear on its bank statements.
  
- c) The Campaign stated that specific checks were either cashed or voided, and if voided they were then deleted.
  
- d) The Campaign stated that it made corrections to the reported amounts.

### **Board's Response**

- a) The Campaign did not amend its disclosure statements to report these transactions. However, adequate invoices were submitted for the two expenditures in the amounts of \$113 and \$173. The Board will take no further action on these matters other than to make them a part of the candidate's record with the Board. However, the Campaign did not submit an invoice for the \$136 transaction for Cingular Interactive. As a result, this expenditure was added to the general election expenditure limit calculation (see Finding #1).
  
- b) The Board will take no further action on this matter other than to make it a part of the candidate's record with the Board.
  
- c) The Campaign did not give an adequate explanation for deleting the eight transactions. The total of \$770 was added to the 2004 expenditure limit calculation and \$1,536 was added to the 2005 general election expenditure limit calculation (see Finding #1).
  
- d) The Campaign did not amend its disclosure statements to properly report these transactions. A total of \$267 was added to the 2004 expenditure limit calculation and \$327 was added to the 2005 general election expenditure limit calculation (see Finding #1).

3. **EXPENDITURES – Credit Card Expenditures**

Campaigns must report the actual vendor and purchase price incurred for any goods purchased with a credit or charge card, rather than the payments made to the credit or charge card company. In addition, the Campaign must provide the Board copies of documentation to verify credit and charge card purchases reported in its disclosure statements. See New York City Administrative Code §§3-703(a)(d), (g) and Rules 3-03(e)(4), 4-01(a), and (e).

The Campaign reported the following expenditures for which it listed as the payee the credit or charge card company instead of the vendor from whom the goods or services were purchased:

<b><u>Payee</u></b>	<b><u>Date Paid</u></b>	<b><u>Stmnt/Sch/TransID</u></b>	<b><u>Amount</u></b>
Chase Platinum Mastercard	05/22/05	10/F/R0002760	\$1,124
Chase Platinum Mastercard	06/27/05	10/F/R0002758	\$570
Chase Platinum Mastercard	08/05/05	14/F/R0002771	\$2,083
Chase Platinum Mastercard	09/08/05	14/F/R0002913	\$460
Chase Platinum Mastercard	10/28/05	16/F/R0003171	\$724
Chase Platinum Mastercard	10/28/05	16/F/R0003172	\$1,123
Chase Platinum Mastercard	12/28/05	17/F/R0003223	\$2,765

**Recommendation #3**

The Campaign must explain its failure to properly disclose credit card purchases listed above. Additionally, it must amend its disclosure statements to disclose the actual vendors who provided the goods or services and the amounts paid to them, and provide supporting documentation for these expenditures, including invoices and credit card statements.

### **Campaign's Response**

The Campaign stated that it mistakenly entered these payments as purchases made by advances and because these purchases were made with the committee's credit card, there was no advance payment for any of these purchases. In addition, the Campaign stated it had detailed payments to vendors and enclosed corresponding credit card statements. The Campaign has amended its disclosure statements to reflect actual vendors.

### **Board's Response**

The Campaign did not clearly indicate which two credit card bills covered transactions 16/F/R0003171 and 10/F/R0002760. In addition, upon review of the submitted credit card statements, it was not clear if all itemized purchases listed were campaign-related, or if they were reported to the Board. Furthermore, the credit card was neither linked to the Campaign's bank account nor opened in the Campaign's name. However, the Board will take no further action on this matter other than to make it a part of the candidate's record with the Board.

**New York City Campaign Finance Board  
Campaign Finance Information System  
Transaction Summary Report  
Appendix 1**

**Candidate:** de Blasio, Bill (ID:326-P)  
**Office:** 5 (City Council)  
**Election:** 2005

1. Opening cash balance (All committees)		\$0
2. Total itemized monetary contributions (Sch ABC)		\$206,863
3. Total unitemized monetary contributions		\$0
4. Total in-kind contributions (Sch D)		\$105
5. Total unitemized in-kind contributions		\$0
6. Total other receipts (Sch E - excluding CFB payments)		\$60
7. Total unitemized other receipts		\$0
8. Total itemized expenditures (Sch F)		\$230,112
Expenditure payments	\$206,912	
Advance repayments	\$23,200	
9. Total unitemized expenditures		\$0
10. Total transfers-In (Sch G)		\$27,200
Type 1	\$0	
Type 2a	\$0	
Type 2b	\$27,200	
11. Total transfers-out (Sch H)		\$0
Type 1	\$0	
Type 2a	\$0	
Type 2b	\$0	
12. Total loans received (Sch I)		\$0
13. Total loan repayments (Sch J)		\$0
14. Total loans forgiven (Sch K)		\$0
15. Total liabilities forgiven (Sch K)		\$0
16. Total expenditures refunded (Sch L)		\$445
17. Total receipts adjustment (Sch M - excluding CFB repayments)		\$3,260
18. Total outstanding liabilities (Sch N - last statement submitted)		\$3,524
Outstanding Bills	\$3,020	
Outstanding Advances	\$504	
19. Total advanced amount (Sch X)		\$0
20. Net public fund payments from CFB		\$0
Total public funds payment	\$0	
Total public funds returned	\$0	
21. Total Valid Matchable Claims		\$29,518
22. Total Invalid Matchable Claims		\$23,290
23. Total Amount of Penalties Assessed		\$937
24. Total Amount of Penalty Payments		\$0
25. Total Amount of Penalties Withheld		\$0

# Exhibit I

## Exhibit I

### Friends of Bill DeBlasio 2005

#### 2005 Elections

#### General Election Expenditure Limit Calculation

(see Finding #1)

	<u>2002-2003</u>	<u>2004</u>	<u>2005</u>
Total Reported General Election Expenditures	\$780	\$62,729	\$153,626
Claimed Exempt Expenditures	<u>(\$0)</u>	<u>(\$10,642)</u>	<u>(\$23,176)</u>
Subtotal	\$780	\$52,087	\$130,450
Audit Adjustments:			
Prior Year Amount Over the Limit			\$15,675
AT & T Wireless Pro-Rata share Attributable to 2003	\$249	(\$249)	
Straus/Baker LLC Pro-Rata share of November 2005*			(\$2,933)
Undocumented/Not Accepted as Exempt Expenditures (Exhibit Ia)		\$2,800	
Post Election Expenditures Attributable to General Election (Exhibit Ib)			\$5,204
Reported Outstanding Advances without Dates (see Exhibit Ic)	\$212		\$292
Unreported Transactions (see Finding #2a)			\$136
Deleted Uncashed Checks (see Finding #2c)		\$770	\$1,536
Misreported Checks (see Finding #2d)		<u>\$267</u>	<u>\$327</u>
<b>Total Adjustments</b>	<u>\$461</u>	<u>\$3,588</u>	<u>\$20,237</u>
<b>Total Expenditures</b>	\$1,241	\$55,675	\$150,687
Expenditure Limit	<u>(\$3,000)</u>	<u>(\$40,000)</u>	<u>(\$150,000)</u>
Amount Over the Limit	<u>(1,759)</u>	<u>\$15,675</u>	<u>\$687</u>

\*The amount \$2,933 represents a 22 day pro-rata share of Straus/Baker LLC's \$4,000 invoice for November 2005 which is not considered a general election expenditure (22 x (\$4,000/30)).



# Exhibit Ia

**Exhibit Ia**

**Friends of Bill de Blasio 2005**

**2005 Elections**

**Reported Exempt Expenditures Not Accepted as Exempt**

(see Finding #1)

<u>Name</u>	<u>Stmt</u>	<u>Sch</u>	<u>TransID</u>	<u>Invoice Date</u>	<u>Purpose Code</u>	<u>Amount</u>	<u>Note</u>
<b>Year 2004 Exempt Expenditures:</b>							
Straus/Baker LLC	5	F	R0001196	01/01/04	CONSL	\$350	1
Straus/Baker LLC	5	F	R0001198	04/01/04	CONSL	\$350	1
Straus/Baker LLC	6	F	R0001970	08/11/04	CONSL	\$350	1
Straus/Baker LLC	6	F	R0001966	09/08/04	CONSL	\$350	1
Straus/Baker LLC	6	F	R0001838	09/08/04	CONSL	\$350	1, 2
Straus/Baker LLC	6	F	R0001487	11/09/04	CONSL	\$350	1
Straus/Baker LLC	6	F	R0001533	12/22/04	CONSL	\$350	1
Straus/Baker LLC	6	F	R0001527	12/22/04	CONSL	<u>\$350</u>	1
					<b>Total</b>	<b><u>\$2,800</u></b>	

**Notes:**

1. The 2004 Straus/Baker agreement does not provide for exempt services.
2. No invoice/documentation provided for this transaction.

# Exhibit Ib

## Exhibit Ib

### Friends of Bill DeBlasio 2005

#### 2005 Elections

#### Post-Election Expenditures Attributable to the General Election

(see Finding #1)

<u>Payee</u>	<u>Stmnt/Sch/TransID</u>	<u>Invoice Date</u>	<u>Date Paid</u>	<u>Amount</u>	<u>Reason per invoice</u>
Silverio, Juana	17/F/R0003208	11/11/05	12/06/05	\$327	No invoice provided
Verizon Wireless	17/F/R0003232	12/17/05	12/17/05	\$321	For prior month services
DYS Productions*	17/F/R0003339	11/09/05	11/09/05	\$2,000	No invoice provided
Gaspard, Michael*	17/F/R0003342	11/14/05	11/14/05	\$90	No invoice provided
De Blasio, Bill	17/F/R0003576	N/A	12/28/05	\$1,352	see Note 1 below
Hatch, Peter	17/F/R0003251	N/A	12/28/05	\$874	see Note 2 below
Figueroe, Sarah	17/F/R0003281	N/A	12/15/05	\$204	see Note 3 below
Polavarapu, Sharada	17/F/R0003277	N/A	01/09/06	\$36	see Note 4 below
			<b>Total</b>	<b><u>\$5,204</u></b>	**

\* These two transactions totaling \$2,090 were not originally reported by the Campaign and therefore were not included in the draft audit report.

\*\* The Campaign did not respond to any of these transactions.

#### Note:

1. Based on the Campaign's response to its draft audit report, including its newly reported itemization of advance repayments, its submission of credit card statements, and its response to the expenditure limit finding, \$1,352 of the \$2,765 advance repayment to Bill de Blasio is for purchases prior to the general election and therefore is attributable to the general election.
2. Based on the Campaign's newly reported itemization of advance repayments, \$874 of the \$1,642 advance repayment to Peter Hatch is for purchases prior to the general election and therefore is attributable to the general election.
3. The total amount of the \$204 advance repayment to Sarah Figueroe is for purchases prior to the general election and therefore is attributable to the general election.
4. Based on the Campaign's newly reported itemization of advance repayments, \$36 of the \$201 advance repayment to Sharada Polavarapu is for purchases prior to the general election and therefore is attributable to the general election.

# Exhibit Ic

**Exhibit Ic**

**Friends of Bill DeBlasio 2005**

**2005 Elections**

**General Election Expenditure Limit Calculation**

**Reported Outstanding Advances without Dates Attributable to the General Election**

(see Exhibit I)

<u>Name</u>	<u>Stmt/Sch/TransID</u>	<u>Purpose</u>	<u>Amount</u>	<u>Analysis</u>
<b><u>For 2003:</u></b>				
Colavito, Peter	17/N/R0000122	ADVAN	<u>\$212</u>	The Campaign did not respond.
<b><u>For 2005:</u></b>				
De Blasio, Bill	17/N/R0000163	ADVAN	\$154	The Campaign did not respond.
Marcello, Kerci	17/N/R0001829	ADVAN	<u>\$138</u>	The Campaign did not respond.
		<b>Total</b>	<b><u>\$292</u></b>	

# Exhibit II

**Exhibit II**

**Friends of Bill DeBlasio 2005**

**2005 Elections**

**Deleted Transactions**

**(see Finding #2c)**

<u>Payee</u>	<u>Check No.</u>	<u>Stmnt/Sch/TransID</u>	<u>Date</u>	<u>Amount</u>	<u>Note</u>
<b><u>In 2004:</u></b>					
Nachas Latino Society	2020	6/F/R0001444	10/21/04	\$150	(1)
Independent Neighborhood Dem.	2024	6/F/R0001459	10/21/04	\$170	(1)
Kings County Democrats	2025	6/F/R0001463	10/21/04	\$300	(1)
Stonewall Democrats	2027	6/F/R0001469	10/21/04	<u>\$150</u>	(1)
			<b>Total</b>	<b><u>\$770</u></b>	
<b><u>In 2005:</u></b>					
de Blasio, Bill	2101	7/F/R0002183	03/04/05	\$236	(1)
Polavarapu, Sharada	2234	14/F/R0002908	09/15/05	\$984	(2)
Citizens Union	2260	16/F/R0003129	10/28/05	\$250	(1)
Figuereo, Sarah	2275	16/F/R0003203	11/07/05	<u>\$66</u>	(1)
			<b>Total</b>	<b><u>\$1,536</u></b>	

**Notes:**

- (1) The Campaign did not adequately respond to this finding/transaction.
- (2) The Campaign stated that the work done by Sharada Polavarapu was incomplete but did not explain what part of the work was completed or why the worker was not paid for partial work.