



Summary of Final Board Determination

Christopher Carew
Candidate, EC2017, City Council District 41
Program non-participant
Richard Campbell, Treasurer of Carew for City Council

The Board determined that the Campaign failed to comply with the requirements of the Campaign Finance Act and Board rules, and assessed violations and penalties as detailed below.

1. Failing to provide bank statements \$200

Campaigns are required to provide complete copies of bank, credit card, and merchant account statements for all accounts used for each election. *See* Admin. Code §§ 3-703(1)(d), (g), (11), 3-719(1); Board Rule 3-03(f), 4-01(f)(1).

The Campaign failed to provide bank account statements from September 2017 to the present.

The Board assessed a penalty of \$200 for this violation.

2. Filing a late disclosure statement Violation; No Penalty

Campaigns are required to file complete and timely disclosure statements on scheduled dates. *See* N.Y.C. Charter § 1052(a)(8); Admin. Code §§ 3-703(6), (12), 3-708(8), 3-719(1); Board Rules 1-09, 3-02.

The Campaign filed Disclosure Statement 16 on January 18, 2018, two days after the due date.

The Board assessed a violation with no penalty.

3. Failing to demonstrate compliance with reporting requirements for receipts \$250

Campaigns are required to demonstrate compliance with reporting requirements and are required to provide bank records, including bank statements and deposit slips. *See* Admin. Code §§ 3-703(1)(d), (g), (6), (11), (12), 3-719(1); Board Rules 1-09, 3-03(c), (d), (e), 4-01.

The Campaign reported \$7,841.36 in receipts, but the bank statements provided only account for \$5,778.41 in receipts, a difference of \$2,062.95, resulting in a 26.31% variance between the receipts reported and documented by the Campaign.

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

4. Failing to respond to the Draft Audit Report \$500



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Campaigns are required to maintain records, such as copies of checks, invoices, and bank records, to verify financial transactions reported in disclosure statements, and campaigns are required to provide such records to the Board upon request and to respond to specific questions regarding compliance with the Act and Board rules. *See* Admin. Code §§ 3-703 (1)(d), (g), (6), (11), (12), 3-708(5), 3-710(1), 3-719(1)(b); Board Rules 1-09(a), 4-01, 4-05(a).

On April 13, 2018 CFB staff sent the Campaign the Draft Audit Report (“DAR”) with a response deadline of May 14, 2018. The Campaign did not respond to the DAR or to reminders and outreach from CFB staff after the deadline.

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