



Summary of Final Board Determination

Mark Gjonaj

Candidate, EC2017, City Council District 13

Program non-participant: \$0 public funds received

Vilma Jankovic, Treasurer of New Yorkers for Mark Gjonaj

The Board determined that the Campaign substantially complied with the Campaign Finance Act and Board rules and assessed violations and penalties as detailed below.

1. Failing to report and late reporting of transactions in daily pre-election disclosure statements \$300

All aggregate contributions and/or loans from a single source in excess of \$1,000, and all aggregate expenditures to a single vendor 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), 3-719(1); Board Rules 1-08(b), 1-09, 3-02(e).

The Campaign reported two contributions from an individual totaling \$1,100, both received on August 31, 2017, four days late, and reported a \$2,000 contribution from an individual, received on November 3, 2017, two days late. The Campaign also failed to file the required daily disclosures to report two contributions from an individual, both received on August 31, 2017, totaling \$2,525.62, and expenditures to two vendors totaling \$47,489.19.

The Board assessed total penalties of \$300 for the unreported transactions and a violation with no associated penalty for the late reported contributions.

2. Failing to document transactions \$806

Campaigns are required to document all financial transactions. See Admin. Code §§ 3-703(1)(d), (g), (11), (12), 3-715, 3-719(1)(b); Board Rules 1-09, 4-01(a), (c), (g), (k), 4-03. In-kind contributions include goods or services donated to a candidate free of charge or at a special discount not available to others. See Admin. Code § 3-702(8); Board Rule 1-02. Creditors who extend credit beyond 90 days are considered to have made a contribution equal to the credit extended, unless the creditor continues to seek payment of the debt. Outstanding liabilities that are forgiven or settled for less than the amount owed are also considered contributions. See Board Rules 1-04(g)(4), (5).

The Campaign failed to document 12 in-kind contributions.

The Board assessed total penalties of \$806 for these violations.

3. Accepting a contribution from a limited liability company \$250

Campaigns may not accept a campaign contribution from any corporation, limited liability company (LLC), or partnership. See N.Y.C. Charter § 1052(a)(13); Admin. Code §§ 3-702(8), 3-



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703(1)(l), 3-719(2)(b); Board Rules 1-04(c)(1), (e), (g), 1-05. In-kind contributions include goods or services donated to a candidate free of charge or at a special discount not available to others. See Admin. Code § 3-702(8); Board Rule 1-02. Creditors who extend credit beyond 90 days are considered to have made a contribution equal to the credit extended, unless the creditor continues to seek payment of the debt. Outstanding liabilities that are forgiven or settled for less than the amount owed are also considered contributions. See Board Rules 1-04(g)(4), (5).

The Campaign did not report any expenditures related to a fundraiser held at F&J Pine Restaurant, which is incorporated as 4 A Kids, LLC, indicating that goods and/ or services were provided free of charge.

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