



Summary of Final Board Determination

Barry Grodenchik
Candidate, EC2017, Council District 23
Program non-participant
Simon Pelman, Treasurer of Grodenchik 2017

The Board determined that the Campaign has failed to comply with the Campaign Finance Act and Board rules, and assessed violations and penalties.

1. Failing to demonstrate compliance with cash receipts reporting and documentation requirements \$547

Campaigns are required to report all cash receipts, deposit them into the bank account listed on the candidate's filer registration and/or certification within ten business days of receipt, and provide the deposit slips for the account to the Board. See Admin. Code §§ 3-703(1)(d), (g), (6), (10), (11), (12); Board Rules 1-04(a), (b), 2-06(a), 3-03(c), 4-01(a), (b)(1), (3), (f).

The Campaign reported \$2,109 in cash receipts, but did not provide any deposit slips. This constitutes a variance of 100% between the cash receipts reported and documented by the Campaign.

The Board assessed a penalty of \$547 for this violation.

2. 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 \$128,700 in receipts, but the bank statements provided account for \$137,747 in receipts, a difference of \$9,047. This constitutes a variance of -7.03% between the receipts reported and documented by the Campaign.

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

3. 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 12, due on September 22, 2017, on September



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25, three days late.

The Board found a violation, but did not assess a penalty.

4. Failing to respond to the Draft Audit Report \$1,000

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 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).

The Campaign's Draft Audit Report was issued on April 20, 2018 with a response due date of May 21, 2018. The Campaign did not respond to the Draft Audit Report.

The Board assessed a penalty of \$1,000 for this violation.