



## Summary of Final Board Determination

### **Zead Ramadan**

**Candidate, 2013, City Council District 7**

**Program participant: \$50,371 in public funds received**

The Board previously made a determination on violations and penalties for this campaign on [October 23, 2015](#), and a final audit was issued on September 30, 2016. Due to a series of unique events, the Board and the campaign agreed to reopen the audit and the Board made this new and final determination.

#### **1. Failing to report transactions \$641**

Campaigns are required to properly report all financial transactions to the Board. *See* Admin. Code §§ 3-703(1)(d), (g), (6), (11), (12); Board Rules 1-09, 3-03(c), (d), (e), 4-01.

The Campaign did not report transactions totaling \$32,068.18 that appeared on its bank statements.

The Campaign misreported advance purchases by an employee in the amounts of \$197.22 on April 19, 2013 and \$50 on August 16, 2013, for wireless internet and car service, respectively.

The Board assessed total penalties of \$641 for these violations.

#### **2. Failing to demonstrate compliance with reporting requirements for receipts and disbursements \$2,500**

Campaigns are required to demonstrate compliance with the 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); Board Rules 1-09, 3-03(c), (d), (e), 4-01.

The Campaign reported total monetary receipts of \$183,482, but its bank statements reflect credits totaling \$194,754.48. This constitutes a reporting variance of \$11,272.48 (-6.14%).

The Campaign reported total monetary disbursements of \$156,001.96, but its bank statements reflect debits totaling \$188,823.53. This constitutes a reporting variance of \$32,821.57 (-21.04%).

The Board assessed total penalties of \$2,500 for these violations.

#### **3. Filing late disclosure statements \$100**

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); Board Rules 1-09, 3-02.



## **Summary of Final Board Determination**

The Campaign filed both Statement 9 (due July 15, 2013) and Statement 10 (due August 9, 2013) one day late.

The Board assessed total penalties of \$100 for these violations.

### **4. Failing to demonstrate compliance with subcontractor reporting and documentation requirements \$200**

If a campaign makes an expenditure to a vendor that relied on subcontractors to provide the goods or services to the campaign, and the cost of the subcontracted goods or services provided by a single subcontractor exceeds \$5,000, the campaign must report, in addition to the expenditure, the name and address of the subcontractor, the amount(s) of the expenditure(s) to the subcontractor, and the purpose(s) of the subcontracting. The candidate must also obtain and maintain documentation from each vendor that used subcontractors. *See* Admin. Code §§ 3-703(1)(d), (g), (6), (11); Board Rules 3-03(e)(3), 4-01(h).

The Campaign did not report subcontractors used by Bravo Print and Mail (paid \$13,097) or Bill Lynch Associates (paid \$17,500). The Campaign did not provide documentation indicating that it attempted to obtain subcontractor forms from these vendors or determine whether they used subcontractors.

The Board assessed total penalties of \$200 for these violations.

### **5. Accepting contributions from corporations, limited liability companies, or partnerships \$500**

Campaigns may not accept, either directly or by transfer, a campaign contribution or loan, or guarantee or other security for such loan, from any corporation, limited liability company (LLC), or partnership. *See* N.Y.C. Charter § 1052(a)(13); Admin. Code §§ 3-702(8), 3-703(1)(l); Board Rules 1-04(c)(1), (e), (g), 1-05. Campaigns are prohibited from accepting contributions in excess of the applicable contribution limit. *See* Admin. Code §§ 3-702(8), 3-703(1)(f), (11); Board Rules 1-04(c)(1), (h), 1-07(c).

The Campaign accepted a \$500 contribution from Nassef F. Hassan Physician, P.C. on March 8, 2013. The deadline to refund the contribution was August 6, 2013. The Campaign refunded the contribution on August 9.

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

### **6. Accepting a contribution from an unregistered political committee \$250**

Campaigns may not accept a contribution from a political committee unless the political committee is registered with the CFB or registers with the CFB within 10 days of receipt of the contribution (participants and limited participants only). *See* Admin. Code §§ 3-702(11), 3-



## Summary of Final Board Determination

703(1)(k), 3-707; Board Rules 1-04(c)(1), (d), (g), 1-05.

On July 31, 2013, the Campaign accepted a \$500 contribution from Arab American Leadership PAC, which was not registered as a political committee. The deadline to refund the contribution was August 21, 2013. The Campaign refunded the contribution on August 30.

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

**7. Failing to document transactions \$200**

Campaigns are required to document all financial transactions, including loans, in-kind contributions, and joint expenditures. *See* Admin. Code §§ 3-703(1)(d), (g), (11), (12), 3-715; Board Rules 1-09, 4-01(a), (c), (g), (k), 4-03.

The Campaign reported but failed to adequately document five in-kind contributions.

The Campaign also failed to document a joint expenditure for a palm card with the campaigns of Letitia James and John Liu.

The Board assessed total penalties of \$200 for these violations.

**8. Making cash expenditures greater than \$100 \$1,644**

Campaigns are prohibited from making an expenditure greater than \$100 using cash. *See* Board Rules 1-08(i) and 4-01(e)(2).

The Campaign made cash withdrawals in excess of \$100 totaling \$16,441.50.

The Board assessed a penalty of \$1,644 for this violation.

**9. Failing to demonstrate that spending was in furtherance of the campaign \$1,862**

Campaigns are required to demonstrate that all spending was in furtherance of the campaign. *See* Admin. Code §§ 3-702(21)(a), (b); 3-703(1)(d), (g), (6), (11); Board Rules 1-03(a), 4-01(e).

The Campaign provided a copy of a consultant agreement with the treasurer, stating that he would be compensated \$750 on a bi-weekly basis from February 1, 2013 until the end of the primary election. Thus, under the contract, the treasurer should have been paid \$11,250, but the Campaign paid \$15,200 (including a \$500 payment on January 22, 2013, which was outside the period covered in the contract). The Campaign thus paid the treasurer \$3,950 more than the contracted amount.



## New York City Campaign Finance Board

100 Church Street, 12<sup>th</sup> Floor, New York, NY 10007

212.409.1800 | [www.nycffb.info](http://www.nycffb.info)

### **Summary of Final Board Determination**

The Campaign provided a copy of a consultant agreement with another employee stating that he would be compensated \$1,000 on a bi-weekly basis from February 1, 2013 until the end of the primary election. Thus, under the contract, the employee should have been paid \$15,000, but the Campaign paid \$15,500 (including a \$500 payment on January 22, 2013, which was outside the period covered in the contract). The Campaign thus paid the employee \$500 more than the contracted amount.

The Campaign reported a \$1,000 expenditure to an individual on February 27, 2013, as well as payments to another individual totaling \$2,000, for which it did not provide a contract or any other documentation.

The Board assessed total penalties of \$1,862 for these violations.