



Summary of Final Board Determination

Annabel Palma

Candidate, 2013, Council District 18

Program participant: \$45,044 in public funds received

1. Failing to provide bank/merchant account statements \$500

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

The Campaign did not provide merchant account statements from inception to the present for its Litle & Co. and ActBlue accounts. The Campaign should have provided actual merchant account statements, or, if those did not exist, a spreadsheet, created by the merchant account providers, outlining all account activity. The Campaign also failed to provide a bank statement covering the period of September 5, 2014 through September 16, 2014.

The Board assessed a penalty of \$500 for these violations.

2. Accepting contributions from corporations, limited liability companies, or partnerships \$375

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, 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).

The Campaign accepted and timely refunded a \$250 contribution from Century Waste Services, LLC.

The Campaign also provided a \$2,500 invoice indicating that the Campaign received a discount from Accurateye Marketing in connection with goods/services being provided. Specifically, the Accurateye invoice contained a line item for “[d]esign, print and deliver poster stickers,” but did not include a corresponding dollar amount. Therefore, the line item is considered to be an in-kind contribution from a prohibited source.

The Board assessed a penalty of \$375 for these violations.



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3. Converting campaign funds to a personal use \$2,969

Campaigns are prohibited from converting campaign funds to a personal use. *See* Admin. Code §§ 3-702(21)(b); Board Rules 1-03(a). 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 reported a \$2,375 expenditure to World Class Speech Service for a public speaking training program. The invoice for the expenditure was dated October 14, 2013. The Campaign contended that this expenditure was campaign related and was necessary to provide the Candidate with an edge in communicating with the voting public prior to the general election. However, the characteristics of this expenditure, including the timing of the invoice (three weeks before the general election), and lack of other key details (including specifically how, when, and where the Candidate used the service), indicate that it was made for personal use.

The Board assessed a penalty of \$2,969 for this violation.