



Summary of Final Board Determination

Sunny Hahn

Candidate, 2013, City Council District 20

Program participant: \$23,100 in public funds received

1. Failing to demonstrate compliance with cash receipts reporting and documentation requirements \$623

Campaigns are required to report all cash receipts, deposit them into the bank account listed on the candidate's filer registration and/or certification, 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 \$4,025 in cash receipts, but provided deposit slips accounting for \$6,520 in cash receipts, a difference of \$2,495. This constitutes a 61.99% variance.

The Board assessed a penalty of \$623 for this violation.

2. Failing to demonstrate compliance with subcontractor reporting and documentation requirements \$100

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 paid a vendor \$10,000, but did not report any subcontractors used by the vendor. Correspondence from the vendor indicated that the vendor did in fact use subcontractors and had been authorized to do so by the Campaign.

The Board assessed a penalty of \$100 for this violation.

3. Failing to document transactions \$300

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, a \$1,275 in-kind contribution from a 2013 Mayoral candidate. The contribution was for joint petitioning costs, but the Campaign failed to document the total cost of the service(s), how the Campaign's share was determined, and



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what, if any, other goods/services were provided.

The Campaign failed to document expenditures for “light refreshments” served at a fundraising event. Finally, the Campaign failed to document expenditures for the payment of wages to a worker on Election Day.

The Board assessed a penalty of \$300 for these violations.

4. Failing to demonstrate that spending was in furtherance of the Campaign \$277

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 expenditures for wages totaling \$1,110 to five individuals whose signatures on their endorsed checks and timesheets did not match. The Campaign failed to provide signed verifications from these individuals affirming the work they performed and wages they received.

The Board assessed a penalty of \$277 for this violation.

5. Late response to the initial document request \$250

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); Board Rules 1-09(a), 4-01, 4-05(a).

The Campaign responded to the initial document request 50 days late.

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