Good morning. My name is Diane Kolack. I am the Treasurer & Compliance Officer for the Leavitt for our Communities campaign. My background includes over ten years of working in the financial and legal sectors, as a corporate accountant and financial analyst, and currently as a paralegal. This was my first campaign experience, and overall, it was very positive. To begin today, I'd like to compliment and call attention to all of the very excellent people at the CFB who I worked with including: Leahruth Jemillo, Roxanne Baldeo, John Ross Barikdar, Matt Salber, Daniel Cho, Tashaun Ross, Adam Schafenberg, and Jihee Suh. I was asked to speak about my experience on the administrative end of working with the Campaign Finance Board, and I have organized my comments into six areas.

Number 1– Paper Waste.

From both a practical and environmental standpoint, it is my feeling that redundant photocopies are a big problem in the current system. For instance, at our July compliance visit, I was required to make copies of all of our records to date– the copy piles were the size of several reams of paper. Then, in our audit Document Request, just submitted yesterday, I was required to re-copy most of that material, in some cases more than once, for various categories of documents.

To offset this waste, perhaps the CFB could plant trees or sponsor environmental programs in NYC for every political committee that participates in the program...

Alternatively, I would like to suggest that there be an option for campaigns to scan receipts and other pieces of backup documentation, and electronically associate the file content with a C-Smart file. Then it would be possible to submit *everything* electronically. I know that every campaign may not have the resources or knowledge to be able to handle this, but everyone has made the transition to using C-Smart and this added functionality would not be any more burdensome than spending hours in front of a copy machine. In fact, campaign committee scanning would alleviate the need for the CFB to do so, as it does now. Scanning needs to be an option for the more resourceful and tech-savvy campaigns, or at least a pilot project for those who want to run more environmentally responsible campaigns.

Number 2– Clear Instructions

I applaud the CFB for writing the Handbook and other sources of information in clear English rather than legal jargon, and again, my overall experience has been a positive one. However, the instructions for the Audit Document Request were clearly not proofread before being sent out, which could potentially have had significant negative financial consequences for anyone who received these reports and failed to seek clarification from their liaison.

For example, on the Expenditure Request, the instructions read "For items with no code, consult the code sheet" [for information on what to provide]. Since there were no instructions on the code sheet for items with no code, I concluded that no documentation was required for expenditures with no code. Despite this apparent logic, and because I had not provided any documentation of expenses in the past, I thought it wise to consult my audit liaison because it was vague and unclear. And of course, the CFB wanted documentation for *all* expenses, even the ones without codes.

Considering the penalties for noncompliance with the unclear instructions, this must be overhauled for next time.

Another example was on the Request for Contribution Refunds & Adjustments. The instruction page says to provide documentation for ALL transactions on the report, while the report says to provide documentation for highlighted transactions ONLY. And, of course, failure to comply with these contradictory directions may result in the finding of a violation.

Number 3– C-Smart Training

C-Smart training needs to include more about how to use reports and how to customize them. I took both the regular and the advanced C-Smart trainings and do not remember this being covered much in depth. As recently as this past week, I was discovering time-saving elements such as the "Go To Transaction" feature hidden away under the "Select" menu when a report is open. This training would be much more useful than the 10 minutes spent learning how to track demographic information of contributors which I doubt many campaigns really use in practice.

C-Smart training classes should also include more election procedure information, including for example, a bit about the Certified Statement of

Need. My candidate almost had a heart attack trying to get this in on time because we weren't as familiar with it as we needed to be.

Number 4– Unnecessary refunds by certified check

This is another example of a lack of familiarity and training with election procedures. Up until our compliance visit, I had been getting certified bank checks (as instructed in my training) to return contributions that were made payable to the candidate instead of the committee. I was frustrated when the auditors said that I could have just had the contributors sign letters confirming the intention of their contribution, and that certified checks were unnecessary. Each check cost our committee $10 in bank fees and about thirty minutes of my time dealing with the bank and processing the checks.

Number 5– Suggestions for the Handbook

The CFB Handbook needs to include language for, if not samples of, letters for "problem" contributions to be resolved. I was told that the very clear letter that I had a contributor sign had to be replaced because it did not contain some specific language. So the donor had to sign and return *another* letter. It is unfair to expect committees to harass contributors over and over again like that. A clear example of the required language in the handbook to begin with would take care of the problem.

It would also be helpful if the CFB Handbook included a sample form for tracking the required details at fundraisers and house parties. It's cumbersome to reconstruct this information after the event from the busy candidate's or party host's memory. If the Board would like, I can provide a copy of the form I developed during the campaign.

The CFB Handbook might also provide guidance about how to organize campaign materials such as expenses, cards, contribution letters, backup, etc for maximum efficiency during filings. Beginning with the end in mind could help to save a lot of time during filing.

Number 6– Communication

Email & C-Access made communication with the CFB very easy. Also, it helped that all the CFB employees who I worked with were helpful and always willing to research my questions. Go CFB! I really appreciated quick responses in the face of deadlines, from liaisons, auditors and the legal team.

I also appreciated that any liaison was able to help me if my assigned liaison was unavailable.

Finally, though not related to my work as treasurer, as a voter, I would like to see the CFB prohibit contributions from unions and political action committees. Individuals vote. Organizations do not. They have no business funding campaigns either.

I thank the Board for the opportunity to address you this morning and will supply you with a written copy of my remarks.