

*New York State Board of Elections Compliance Unit*  
 Compliance Review Checklist – 2021 Primary Election Report  
 Committee Type 8: Independent Expenditure Committee

<b>Committee Name and Filer ID #: 10860; NEW YORK FOR RAY</b>			
<b>Deficiencies Found: (D)*</b>	<b>YES</b>	<b>Reviewer Name:</b>	Kathleen McGrath
<b>Training Issues Found: (T) *</b>	<b>YES</b>	<b>Reviewer Contact Phone #:</b>	(518) 486-5069
<b>Compliant:</b>	<b>NO</b>	<b>Date of Review:</b>	December 14, 2021
<b>Report Information:</b>	Report period:	32 Day Pre Primary	Report year: 2021
	Date Range of report:	01/12/21 - 05/17/21	OHNT/TRMD: No
	Date Report Filed:	July 2, 2021	Amendment: Yes

**COMMENTS:**

Monetary Contributions Received from Corporations: Improper use of transaction type. You have disclosed TWO contributions received from LLCs here (**Liontree LLC** and **GFP Real Estate LLC**). These two entries are to be disclosed using the Monetary Contributions from All Other transaction type. Please remove both entries here and disclose them under the proper transaction type.

Additionally, all contributions by an LLC/PLLC must be attributed to each member of the LLC in proportion to the member's ownership interest in the company. To do so, upon receipt of a contribution from a Limited Liability Company (LLC, including PLLCs), the contribution must first be disclosed under the Monetary Contributions from All Other transaction type (as the total contribution from the entity), and then **attributed** to the owners. It is incumbent upon the treasurer to obtain all the required information from the contributing LLC. That includes the name(s), address(es), and percent ownership in the LLC/PLLC (in order to calculate how much of the total contribution is attributed to each owner). **Please amend this filing to include the required information about all member owners.** \*\*Since the Liontree LLC contribution was refunded, this entity's ownership information is not required. But, **this information is required for the GFP Real Estate LLC contribution.**\*\*

You may access a playlist of training videos showing how to report LLC contributions compliantly here:

<https://www.elections.ny.gov/CFaboutWebBasedEFS.html>

Expenditures/Payments: Please review your disclosed expenditures to ensure that subcontractor information is disclosed properly. A number of explanation fields appear to describe subcontracted services, but these are not disclosed properly on the report. Please review and amend as necessary.

It appears the committee has disclosed a number of salary expenditures to **Katherine Runsdorf** (on this report and others), but Ms. Runsdorf was not disclosed as a salaried employee in section G of the committee's registration form (CF-02). Please review and amend.

Improper use of transaction type. You have disclosed THREE contribution refunds here as Expenditures/Payments (**Liontree LLC, Karl Dasher, Aby Rosen**). Please remove these three entries from this transaction type and disclose them properly using the Contributions Refunded transaction type.

Expense Allocation: As an independent expenditure committee, you are required to include Expense Allocation in your filings to disclose the allocation of independent expenditures made. It appears that during this filing period, your committee spent funds on many independent expenditures, but have not allocated them among the applicable candidates your committee is supporting or opposing. *Additionally*, please be aware that this is a running tally, to be aggregated throughout an election cycle. Please amend.

<b>REVIEW OF ALL TRANSACTION TYPES:</b>		<b>Y/N</b>	<b>D/T*</b>	<b>Instructions:</b>
1.	Date Range of filed report incorrect	<b>N</b>	T	If Yes, see comment(s) above
2.	Negative Balance	<b>N</b>	D	If Yes, see comment(s) above
3.	Missing or incomplete names	<b>N</b>	D	If Yes, see comment(s) above
4.	Missing or incomplete addresses	<b>N</b>	D	If Yes, see comment(s) above
5.	Missing check #'s	<b>N</b>	D	If Yes, see comment(s) above

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6.	Anonymous Contributions	<b>N</b>	D	If Yes, see FAQ sheet and Comment(s) above
7.	Cash contribution greater than \$100	<b>N</b>	D	If Yes, see FAQ sheet and Comment(s) above
8.	Raffles	<b>N</b>	D	If Yes, see FAQ sheet and Comment(s) above
9.	Payments to individual/entity without itemization	<b>N</b>	D	If Yes, see comment(s) above
10.	Incorrect use of transaction type	<b>Y</b>	T	If Yes, see comment(s) above
11.	Failed to provide allocation for all LLC/PLLC contrbs	<b>Y</b>	D	If Yes, see comment(s) above

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<b>MONETARY CONTRIBUTIONS RECEIVED FROM IND. &amp; PART.</b> (old Schedule A)				
12.	Incorrect use of transaction type	<b>N</b>	<b>T</b>	If Yes, please amend
13.	Incorrect use of contribution code	<b>N</b>	<b>T</b>	If Yes, please amend
14.	Joint contributions	<b>N</b>	<b>T</b>	If Yes, please amend
15.	Failed to provide Part. allocation for contrb > \$2,500	<b>N</b>	<b>D</b>	If Yes, must amend
16.	Contribution received from a non U.S. address	<b>N</b>	<b>D</b>	If Yes, see FAQ sheet
<b>MONETARY CONTRIBUTIONS RECEIVED FROM CORPORATION</b> (old Schedule B)				
17.	Incorrect use of transaction type	<b>Y</b>	<b>T</b>	If Yes, please amend
18.	Contribution received from a non U.S. address	<b>N</b>	<b>D</b>	If Yes, see FAQ sheet
<b>MONETARY CONTRIBUTIONS RECEIVED FROM ALL OTHER</b> (old Schedule C)				
19.	Incorrect use of transaction type	<b>N</b>	<b>T</b>	If Yes, please amend
20.	Incorrect use of contribution code	<b>N</b>	<b>T</b>	If Yes, please amend
21.	Failed to provide allocation for LLC/PLLC contribution(s)	<b>Y</b>	<b>D</b>	If Yes, must amend
<b>IN-KIND (NON-MONETARY) CONTRIBUTIONS RECEIVED</b> (old Schedule D)				
22.	Incorrect use of transaction type	<b>N</b>	<b>D</b>	If Yes, must amend
23.	Incorrect use of contribution code	<b>N</b>	<b>T</b>	If Yes, please amend
24.	Failed to provide description of contribution	<b>N</b>	<b>D</b>	If Yes, must amend
<b>OTHER RECEIPTS RECEIVED</b> (old Schedule E)				
25.	Incorrect use of transaction type	<b>N</b>	<b>T</b>	If Yes, please amend
26.	Code: "OTHER" used without explanation	<b>N</b>	<b>T</b>	If Yes, please amend
<b>EXPENDITURES/PAYMENTS</b> (old Schedule F)				
27.	Incorrect use of transaction type	<b>Y</b>	<b>T</b>	If Yes, please amend
28.	Incorrect use of purpose code	<b>N</b>	<b>T</b>	If Yes, please amend
29.	Code: "OTHER" used without explanation	<b>N</b>	<b>T</b>	If Yes, please amend
30.	Cash expenditure greater than \$100	<b>N</b>	<b>T</b>	Cash expenditures > \$100 prohibited
31.	Wages/payroll payment failed to provide employee info	<b>N</b>	<b>D</b>	If Yes, must amend
32.	Payments to individual/entity without itemization	<b>N</b>	<b>D</b>	If Yes, must amend to provide itemization
33.	Reimbursement to candidate without explanation	<b>N</b>	<b>D</b>	If Yes, must amend to provide explanation
34.	Credit card payments without itemization	<b>N</b>	<b>D</b>	If Yes, must amend to provide itemization
<b>LOANS RECEIVED</b> (old Schedule I)				
35.	Incorrect use of transaction type	<b>N</b>	<b>T</b>	If Yes, please amend
36.	Were any loans reported received?	<input checked="" type="checkbox"/> <b>N</b> <input type="checkbox"/> <b>Y</b>		If No, skip to next transaction type
37.	Is the loan received from a lobbyist, PAC, IE Committee or Labor Union?	<b>N</b>	<b>D</b>	If Yes, must refund, see FAQ
38.	Failed to provide letter of indebtedness?	<b>N</b>	<b>D</b>	If Yes, must provide
<b>LOAN REPAYMENTS</b> (old Schedule J)				

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39.	Incorrect use of transaction type	<b>N</b>	<b>T</b>	If Yes, please amend
40.	Were any loans repaid?	<input checked="" type="checkbox"/> <b>N</b> <input type="checkbox"/> <b>Y</b>		If No, skip to next transaction type
41.	Failed to provide letter of indebtedness for this loan?	<b>N</b>	<b>D</b>	If Yes, must provide
42.	Failed to provide name and/or address of lender	<b>N</b>	<b>D</b>	If Yes, must amend
43.	Failed to provide check #	<b>N</b>	<b>D</b>	If Yes, must amend
<b>LIABILITIES/LOANS FORGIVEN</b> (old Schedule K)				
44.	Was a loan or liability forgiven?	<input checked="" type="checkbox"/> <b>N</b> <input type="checkbox"/> <b>Y</b>		If No, skip to next schedule
45.	Failed to provide name and/or address of creditor/ lender	<b>N</b>	<b>D</b>	If Yes, must amend
46.	Failed to provide letter of forgiveness	<b>N</b>	<b>D</b>	If Yes, must supply letter of forgiveness
<b>EXPENDITURE REFUNDS (Increases Balance)</b> (old Schedule L)				
47.	Incorrect use of transaction type	<b>N</b>	<b>T</b>	If Yes, please amend
48.	Failed to provide name and/or address of payor	<b>N</b>	<b>T</b>	If Yes, please amend
<b>CONTRIBUTION REFUNDS (Decreases Balance)</b> (old Schedule M)				
49.	Incorrect use of transaction type	<b>N</b>	<b>T</b>	If Yes, please amend
50.	Failed to provide name and/or address of contributor	<b>N</b>	<b>D</b>	If Yes, must amend
51.	Failed to provide refund check #	<b>N</b>	<b>D</b>	If Yes, must amend
<b>OUTSTANDING LIABILITIES/LOANS</b> (old Schedule N)				
52.	Incorrect use of transaction type	<b>N</b>	<b>T</b>	If Yes, please amend
53.	Failed to provide name and/or address of creditor	<b>N</b>	<b>D</b>	If Yes, must amend
54.	Failed to use appropriate purpose codes	<b>N</b>	<b>T</b>	If Yes, please amend
<b>EXPENSE ALLOCATION AMONG CANDIDATES</b> (old Schedule R)				
55.	Missing or incomplete names	<b>Y</b>	<b>T</b>	If Yes, please amend
56.	Missing or incomplete address	<b>N</b>	<b>T</b>	If Yes, please amend
<b>MISCELLANEOUS</b>				
57.		<b>N</b>		