



New York City Campaign Finance Board
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October 27, 2015

By First Class Mail and C-Access

Jerry H. Goldfeder
Stroock & Stroock & Lavan LLP

[REDACTED]

Gale Brewer

[REDACTED]

Adele Bartlett

[REDACTED]

Brewer Transition and Inauguration Fund
c/o Bartlett

[REDACTED]

Final Board Determination – 2013 Transition and Inauguration Entity

The New York City Campaign Finance Board (“Board”), at a meeting held on July 9, 2015, determined that Gale Brewer’s 2013 transition and inauguration entity (the “TIE”) violated the Administrative Code of the City of New York (“Admin. Code”) and the Board Rules by accepting an over-the-limit donation. *See* Admin. Code §§ 3-801(2)(b), (4); Board Rules 11-04(b), (c), (d). The Board did not assess a penalty for this violation.

The TIE accepted a \$50,000 loan from Gale Brewer (the “Elected Candidate”) on January 10, 2014. This loan was made after the Elected Candidate’s inauguration on January 1, 2014, and it therefore constituted a \$50,000 donation to the TIE. *See* Admin. Code § 3-801(4); Board Rule 11-04(d). Board Rule 11-04(g) allows an elected candidate to self-fund her TIE as long as the TIE does not accept donations from other sources.

Candidate ID Number: 399

Because the TIE accepted donations from third parties, donations from the Elected Candidate were subject to the \$3,500 donation limit for borough president TIEs. *See* Admin. Code § 3-801(2)(b)(ii); Board Rule 11-04(g). The Elected Candidate had previously donated \$3,500 to the TIE and, as such, the full \$50,000 donation attributable to the January loan was in excess of the donation limit.

You may challenge this final determination, within four months, in the New York State Supreme Court pursuant to Article 78 of the Civil Practice Law and Rules.

This concludes the CFB's review of the TIE. Please ensure that the TIE closes its bank account and note that the TIE is required to maintain its records for six years from the date of its registration. If you have any questions concerning this Final Board Determination, please contact Giovanni Mejia, Associate Counsel, at (212) 409-1865 or gmejia@nyccfb.info.



—
Sue Ellen Dodell
General Counsel
**NEW YORK CITY
CAMPAIGN FINANCE BOARD**

signature on original

SED/GM