



**New York City Campaign Finance Board**  
100 Church Street, 12<sup>th</sup> Floor, New York, NY 10007  
212.409.1800 | www.nycffb.info

Rose Gill Hearn  
Chair

Art Chang  
Richard J. Davis  
Courtney C. Hall  
Mark S. Piazza  
Members

Amy M. Loprest  
Executive Director

Sue Ellen Dodell  
General Counsel

**By Email to** [REDACTED]  
August 4, 2014

Jerry Goldfeder  
Stroock & Stroock & Lavan LLP



*Re: Margaret Chin 2013 Inaugural Committee*

Dear Mr. Goldfeder:

On June 25, 2014, the New York City Campaign Finance Board (the “Board” or “CFB”) received your response on behalf of the 2013 Transition and Inauguration Entity of Margaret Chin (the “TIE”). The response addressed two issues raised by the CFB following its preliminary review of the TIE’s reporting and documentation.

First, the TIE held seven events in connection with the inauguration, both before and after Ms. Chin was sworn in. This unusually high number of events is particularly notable because they were held by an incumbent Councilmember. However, the Board Rules do not place a specific limit on the number of such events. Therefore, while the CFB has concerns about the scale of the TIE’s activity, no further action will be taken.

Second, two staff were employed by the TIE, both of whom were also employed by Ms. Chin’s 2013 Campaign (the “Campaign”), and both of whom were paid \$2,000 per month more in their TIE capacities than in their Campaign capacities. The \$11,000 paid by the TIE to Yuan Yang, the Campaign’s manager, was the highest total wage amount paid to a staff member of any Councilmember’s TIE, while the \$4,000 paid to Francisco Bravo was the third highest. In particular, Mr. Yang’s wages were double the amount paid to the next-highest compensated staff member of any Councilmember’s TIE. However, the Board Rules place no specific limits on amounts paid to TIE staff. Therefore, while these payments to former Campaign staff raise concerns about whether the compensation was related to the activities of the Campaign, rather than the TIE, no further action will be taken.

As a result of these activities, the CFB is reviewing its rules and policies related to TIEs to determine whether changes are needed.

Notwithstanding the issues discussed above, the CFB has determined that the TIE demonstrated substantial compliance with the Campaign Finance Act and Board Rules, based on a review of the documentation and information submitted by the TIE. This concludes the CFB’s review of the TIE and a response to this letter is not required. Please ensure that the TIE closes its bank account. Note that the TIE is required to maintain its records for six years from the date of its registration.

Thank you for your cooperation throughout this process.

Sincerely,



Jesse Schaffer  
Director of Special Compliance

c: Yuan Yang (by C-Access)

Signature on Original