



**New York City Campaign Finance Board**  
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**By C-Access**  
February 4, 2015

Michelle R. Cornegy  
Cornegy 2013



Dear Ms. Cornegy:

On June 9, 2014, the New York City Campaign Finance Board (the “Board” or “CFB”) received the response of the 2013 Transition and Inauguration Entity of Robert Cornegy, Jr. (the “TIE”) to issues raised by CFB staff on May 13, namely the purchase of seven tablets by the TIE after the Councilmember was sworn into office and the Councilmember’s inaugural event was held.

Board Rules prohibit any TIE expenditure for any purpose other than transition or inauguration. On November 24, 2014, CFB staff informed the TIE that “[t]he timing and purpose of the purchase, the number of tablets purchased, and the amount spent, coupled with the risks inherent with the purchase of all electronic goods, raises concerns as to whether the purchase was in furtherance of the elected candidate’s transition and/or inauguration.”

In light of the above and the completion of the TIE’s activity, the TIE was instructed to divest itself of the electronic goods (one option presented was to donate the tablets to the Councilmember’s office), and to provide documentation of such. The TIE failed to respond. However, since the Board Rules do not explicitly prohibit such purchases of electronic goods after the elected candidate has been sworn into office, no further action will be taken.

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

Notwithstanding the above, the CFB has determined that the TIE demonstrated substantial compliance with the Campaign Finance Act and Board Rules. 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.

Sincerely,



Francisco Pardo  
Analyst

Signature on Original