



New York City Campaign Finance Board
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Frederick P. Schaffer
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Paul Seamus Ryan
Executive Director

August 26, 2024

Dear Tom Speaker:

Thank you for reaching out with your concerns. The Campaign Finance Board is a nonpartisan, independent City agency that administers the City's campaign finance and matching funds program, and directly reaches voters through our NYC Votes initiative. The CFB's mission is to make our local democracy more open, transparent, and equitable – we appreciate your shared commitment to these values.

After reviewing the matter raised in your letter, we have determined that the issue falls outside of our authority. In addition to the limits that apply to all contributors, the Campaign Finance Act places strict, low limits on contributions from people affiliated with entities that are doing business with City government, as indicated by their appearance in the "Doing Business Database." These limits are designed to avoid the appearance of or potential for pay-to-play corruption, where campaign contributions impact government decisions. The "Doing Business Law" (Local Law 34 of 2007) applies to contributions made by individuals and does not cover contributions made by political committees or other entities. As such, the particular situation you highlighted is not covered by the law. To effectively address the concerns raised in your letter, changes to the law are necessary.

However, we are pleased to share that the Board is currently considering a change to the rule regarding single source attribution for individuals in the "Doing Business Database" that would potentially make more contributions subject to the doing business limit. The proposal would align the doing business attribution rule with the general rule. The proposed rule can be found on our website [here](#) and is currently open for public comment.

If you believe that an action by a specific organization or political actor warrants formal attention, you may file a [complaint](#). Please note that the CFB can only investigate actions that are alleged to violate the rules and regulations regarding campaign fundraising, campaign or independent expenditures, or other activities under the CFB's jurisdiction. The CFB reviews and responds to all complaints.

Thank you.

Sincerely,

Paul S. Ryan

Paul S. Ryan

Executive Director, New York City Campaign Finance Board