New York City Campaign Finance Board
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Via CFB Portal
April 29, 2025

Dear Oswalt Heymann:

Please find attached the New York City Campaign Finance Board's ("CFB" or "Board") Final Audit Report ("FAR") for the 2023 campaign of Igor Kazatsker (the "Campaign"). CFB staff prepared the report based on a review of the Campaign's financial disclosure statements and documentation submitted by the Campaign.

The report concludes that the Campaign has complied with the Campaign Finance Act (the "Act") and the Board Rules (the "Rules").

Your campaign previously received a notice that your committee met the requirements to cease filing ongoing disclosure for the 2023 election cycle (see Election Law §14-108). The Campaign is required to maintain its records for five years after the election, and the CFB may require the Campaign to demonstrate ongoing compliance. See Rules 4-01, and 4-02.

The CFB appreciates the Campaign's cooperation during the 2023 election cycle. Please contact the Audit Unit at AuditMail@nyccfb.info with any questions about the enclosed report.

Attachments

EC2023 Final Audit Report

Igor For NYC

April 2025

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BACKGROUND

The Campaign Finance Act of 1988, which changed the way election campaigns are financed in New York City, created the voluntary Campaign Finance Program. The Program increases the information available to the public about elections and candidates' campaign finances, and reduces the potential for actual or perceived corruption by matching up to $175 of contributions to Borough President and City Council candidates and up to $250 to candidates for Mayor, Public Advocate and Comptroller from individual New York City residents. In exchange, candidates agree to strict spending limits. Those who receive funds are required to spend the money for purposes that advance their campaign.

The CFB is the nonpartisan, independent city agency that administers the Campaign Finance Program for elections to the five offices covered by the Act: Mayor, Public Advocate, Comptroller, Borough President, and City Council member. All candidates are required to disclose all campaign activity to the CFB. The CFB makes this information available via its online searchable database, increasing the information available to the public about candidates for office and their campaign finances.

All candidates must adhere to strict contribution limits and are banned from accepting contributions from corporations, partnerships, limited liability companies and unregistered political committees. Campaigns must register with the CFB, and must file periodic disclosure statements reporting all financial activity. The CFB reviews these statements after they are filed and provides feedback to the campaigns.

The table below provides detailed information about the Campaign:

Name: Igor Kazatsker
ID: 2783
Office Sought: City Council
District: 48

Committee Name: Igor For NYC
Classification: Participant
Certification Date: February 6, 2023

Ballot Status: Primary, General
Primary Election Date: June 27, 2023
General Election Date: November 7, 2023
Party: Republican, Team Trump

Contribution Limit: $1,050

Expenditure Limit:
2023 Primary: $207,000
2023 General: $207,000

Public Funds:
Received: $139,638.00
Returned: $349.58

Campaign Finance Summary:
https://bit.ly/3Q0L30F

AUDIT RESULTS

The CFB's review did not identify any material findings of non-compliance with the Act or Rules. The CFB appreciates the Campaign's cooperation during the 2023 election cycle.

COMPLAINTS

Complaint #1

On April 5, 2023, Nathaniel Kessar, treasurer for the Inna Vernikov[1] campaign, submitted a complaint against the Campaign.

On April 12, 2023, CFB staff sent the Campaign a copy of the complaint and the Campaign timely responded on May 2, 2023.

Allegation

The Campaign received an in-kind contribution from Davidzon Radio in the form of free airtime for campaign advertisements. The Complainant alleged that the Russian-language radio station had promoted multiple versions of advertisements for the Campaign since at least mid-February 2023 and these advertisements were not reported by the Campaign in Disclosure Statement #3. The complaint included an affidavit from a translator who stated they listened to Davidzon Radio on March 8, 9, 10, and 12th and provided transcripts and translations for eight advertisements, with the earliest allegedly airing on March 8, 2023. The corresponding clips for those advertisements were provided for all except the ad airing on March 8th.

Campaign Response

The Campaign responded that they began running ads on the radio station on March 9, 2023, two days before the end of the disclosure period for Disclosure Statement #3 and they expected to report the related expenditures in Disclosure Statement #4.

CFB Review

On May 26, 2023, the Campaign filed Disclosure Statement #4 and reported $10,000 in outstanding liabilities to Davidzon Media for campaign ads. The expenditure documentation submitted by the Campaign lists the air dates and time of the advertisements, with the first airing on March 9, 2023.

Conclusion:

The Board dismissed the complaint on March 17, 2025.

[1] 2023 candidate for City Council District 48, Kazatsker's opponent in the primary and general elections.

Complaint #2

On May 18, 2023, Nathaniel Kessar, treasurer for the Inna Vernikov[Error! Bookmark not defined.] campaign, submitted a complaint against the Campaign.

On May 22, 2023, CFB staff sent the Campaign a copy of the complaint and the Campaign timely responded on May 30, 2023.

Allegation

The complaint alleged that the Campaign committed fraud by collecting and reporting straw contributions. According to the complaint, various reported contributors admitted via phone calls and sworn affidavits that they did not contribute to the Campaign. As evidence the complaint attached an affidavit from the individual who conducted the phone calls in Russian; an affidavit from the person who translated the phone calls and contributor affidavits; three affidavits from reported contributors and corresponding translations; and recordings and transcripts of eight phone calls with contributors. In total, nine cash contributions made in February 2023 were denied according to the materials provided with the complaint.

Campaign Response

The Campaign responded by submitting affidavits from eight of the nine implicated contributors affirming that the contributors made their reported contribution with their own funds and had not been reimbursed. The Campaign alleged that the phone calls conducted in Russian by the Vernikov campaign used improper terminology and therefore were confusing to the contributors leading to misunderstandings. The Campaign included photos of each contributor holding their affidavits.

CFB Review

According to the caller's affidavit and transcripts of the translated phone calls, the caller asked contributors if the contributor had signed a petition in support of the Campaign and then asked if they donated any money to the Campaign. No follow-up questions regarding the reported contribution were asked. In addition, the affidavits provided by the Complainant stated that the alleged contributors had not signed contributions cards. However, the notarized signatures on the affidavits and the signatures on the contribution cards appear to match, suggesting that the card signatures were genuine.

Given the inconsistencies between the Complainant's allegations and the documentation, and the conflicting affidavits provided by both parties, CFB staff were unable to draw any firm conclusions regarding the evidence.

Conclusion:

The Board dismissed the complaint on March 17, 2025.

SCOPE AND METHODOLOGY

Pursuant to Admin. Code § 3-710(1), the CFB conducted this audit to determine whether the Campaign complied with the Act and Rules. Specifically, we evaluated whether the Campaign:

1. Accurately reported financial transactions and maintained adequate books and records.
2. Adhered to contribution limits and prohibitions.
3. Disbursed funds in accordance with the Act and Rules.
4. Complied with expenditure limits.
5. Received the correct amount of public funds, or whether additional funds are due to the Campaign or must be returned.

Prior to the election, we performed preliminary reviews of the Campaign's compliance with the Act and Rules. We evaluated the eligibility of each contribution for which the Campaign claimed matching funds, based on the Campaign's reporting and supporting documentation. We also determined the Candidate's eligibility for public funds by ensuring the Candidate was on the ballot for an election, or otherwise eligible for an Early Public Funds payment, was opposed by another candidate on the ballot, and met the two-part threshold for receiving public funds. With each disclosure statement, we reviewed the bank records provided by the Campaign and reconciled the activity on the statements provided to the Campaign's reporting. We provided the Campaign with the results of this preliminary bank reconciliation periodically. After the election, we performed an audit of all financial disclosure statements submitted for the election (see summary of activity reported in these statements at Appendix #1).

To verify that the Campaign accurately reported and documented all financial transactions, we reconciled the financial activity on the Campaign's bank and merchant account statements to the financial activity reported on the Campaign's disclosure statements. We identified unreported, misreported, and duplicate disbursements, as well as reported disbursements that did not appear on the Campaign's bank statements. We also calculated debit and credit variances by comparing the total reported debits and credits to the total debits and credits amounts appearing on the bank statements. Cash variances were calculated by comparing the total cash contributions reported to the total of cash deposits on itemized deposit slips. Merchant account variances were calculated by comparing the total credit card contributions reported to the total credits in the merchant account statements. We reconciled the transfers on the submitted merchant account statements to the deposits on the bank account statements.

As part of our reconciliation of reported activity to the bank statements the Campaign provided, we determined whether the Campaign properly disclosed all bank accounts. We also determined if the Campaign filed disclosure statements timely and reported required activity daily during the two weeks before the election. Finally, we reviewed the Campaign's reporting to ensure it disclosed required information related to contribution and expenditure transactions, such as intermediaries and subcontractors.

To determine if the Campaign adhered to contribution limits and prohibitions, we conducted a comprehensive review of the financial transactions reported in the Campaign's disclosure statements. Based on the Campaign's reported contributions, we assessed the total amount contributed by any one source and determined if it exceeded the applicable limit. We also determined if any of the contribution sources were prohibited. We reviewed literature and other documentation to determine if the Campaign accounted for joint activity with other campaigns.

To ensure that the Campaign disbursed funds in accordance with the Act and Rules, we reviewed the Campaign's reported expenditures and obtained documentation to assess whether funds were spent in furtherance of the Candidate's nomination or election. We also reviewed information from the New York State Board of Elections and the Federal Election Commission to determine if the Candidate had other political committees active during the 2023 election cycle. We determined if the Campaign properly disclosed these committees, and considered all relevant expenditures made by such committees in the assessment of the Campaign's total expenditures.

We requested records necessary to verify that the Campaign's disbursement of public funds was in accordance with the Act and Rules. Our review ensured that the Campaign maintained and submitted sufficiently detailed records for expenditures made in the election year that furthered the Candidate's nomination and election, or "qualified expenditures" for which public funds may be used. We specifically omitted expenditures made by the Campaign that are not qualified as defined by the Campaign Finance Act § 3-704.

We also reviewed the Campaign's activity to ensure that it complied with the applicable expenditure limits. We reviewed reporting and documentation to ensure that all expenditures—including those not reported, or misreported—were attributed to the period in which the good or service was received, used, or rendered. We also reviewed expenditures made after the election to determine if they were for routine activities involving nominal costs associated with winding up a campaign and responding to the post-election audit.

To ensure that the Campaign received the correct amount of public funds, and to determine if the Campaign must return public funds or was due additional public funds, we reviewed the Campaign's eligibility for public matching funds, and ensured that all contributions claimed for match by the Campaign were in compliance with the Act and Rules. We determined if the Campaign's activity subsequent to the pre-election reviews affected its eligibility for payment. We also compared the amount of valid matching claims to the amount of public funds paid pre-election and determined if the Campaign was overpaid, or if it had sufficient matching claims, qualified expenditures, and outstanding liabilities to receive a post-election payment. As part of this review, we identified any deductions from public funds required under Rule 7-07.

We determined if the Campaign met its mandatory training requirement based on records of training attendance kept throughout the 2023 election cycle. Finally, we determined if the Campaign submitted timely responses to post-election audit requests sent by the CFB.

Following an election, campaigns may only make limited winding up expenditures and are not going concerns. Because the activity occurring after the post-election audit is extremely limited,

the audit focused on substantive testing of past transactions. The results of the substantive testing served to establish the existence and efficacy of internal controls. The CFB also publishes and provides to all campaigns guidance regarding best practices for internal controls.

To determine if contributors were prohibited sources, we compared them to entities listed in the New York State Department of State's Corporation/Business Entity Database. Because this was the only source of such information, because it was neither practical nor cost effective to test the completeness of the information, and because candidates could provide information to dispute the Department of State data, we did not perform data reliability testing. To determine if reported addresses were residential or commercially zoned within New York City, we compared them to a database of addresses maintained by the New York City Department of Finance. Because this was the only source of such data available, because it was not cost effective to test the completeness of the information, and because campaigns had the opportunity to dispute residential/commercial designations by providing documentation, we did not perform data reliability testing.

The CFB's Special Compliance Unit investigated any complaints filed against the Campaign that alleged a specific violation of the Act or Rules. The Campaign was sent a copy of all formal complaints made against it, as well as relevant informal complaints, and was given an opportunity to submit a response.

The Campaign was provided with a preliminary draft of this audit report and was asked to provide a response to the findings. The Campaign responded, and the CFB evaluated any additional documentation provided and/or amendments to reporting made by the Campaign in response. After reviewing the Campaign's responses, CFB staff determined that the Campaign had resolved all of the outstanding findings.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. We limited our review to the areas specified in this report's audit scope.

[redacted]

Staff: Serhat Akkoc

Leandra Flores

New York City Campaign Finance Board
Campaign Finance Information System
Transaction Summary Report
Appendix 1

Candidate: Kazatsker, Igor (ID:2783-P)
Office: 5 (City Council)
Election: 2023

1. Opening cash balance (All committees)		$0.00
2. Total itemized monetary contributions (Sch ABC)		$19,486.00
3. Total unitemized monetary contributions		$0.00
4. Total in-kind contributions (Sch D)		$1,319.00
5. Total unitemized in-kind contributions		$0.00
6. Total other receipts (Sch E - excluding CFB payments)		$0.00
7. Total unitemized other receipts		$0.00
8. Total itemized expenditures (Sch F)		$159,642.13
Expenditure payments	$155,029.58	
Advance repayments	$4,612.55	
9. Total unitemized expenditures		$0.00
10. Total transfers-In (Sch G)		$0.00
Type 1	$0.00	
Type 2a	$0.00	
Type 2b	$0.00	
11. Total transfers-out (Sch H)		$0.00
Type 1	$0.00	
Type 2a	$0.00	
Type 2b	$0.00	
12. Total loans received (Sch I)		$1,000.00
13. Total loan repayments (Sch J)		$1,000.00
14. Total loans forgiven (Sch K)		$0.00
15. Total liabilities forgiven (Sch K)		$0.00
16. Total expenditures refunded (Sch L)		$1,285.64
17. Total receipts adjustment (Sch M - excluding CFB repayments)		$785.00
18. Total outstanding liabilities (Sch N - last statement submitted)		$0.00
Outstanding Bills	$0.00	
Outstanding Advances	$0.00	
19. Total advanced amount (Sch X)		$0.00
20. Net public fund payments from CFB		$139,288.42
Total public funds payment	$139,638.00	
Total public funds returned	($349.58)	
21. Total Valid Matchable Claims		$17,411.00
22. Total Invalid Matchable Claims		N/A
23. Total Amount of Penalties Assessed		N/A
24. Total Amount of Penalty Payments		$0.00
25. Total Amount of Penalties Withheld		$0.00