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VIA FACSIMILE & MAIL

November 5, 2009

Todd D. Valentine
Co-Executive Director
New York State Board of Elections
40 Steuben Street
Albany, NY 12207-2108

Robert A. Brehm
Co-Executive Director
New York State Board of Elections
40 Steuben Street
Albany, NY 12207-2108

Re: Review of the State Board's campaign finance database identifies apparent corporate contribution limit violations, filings that do not contain donors' addresses, filers who do not have July filings reported in the database, and 24 hour notices that were not filed.

Dear Messrs. Valentine and Brehm:

Our groups have regularly sent you lists of corporations which appeared to have violated the five thousand (\$5,000) dollar annual aggregate contribution limit. We have submitted our reviews in 2007 and 2008. In addition to our corporate review, this year we examined the database for other possible violations.

Apparent corporate violations:

We identified 346 corporations that may have violated the state's \$5,000 corporate limit in 2008. Each of these corporations had contributions reported on candidates' "Schedule B" forms, but there is a chance some are actually LLCs, partnerships, or PACs that appear to be corporations due to sloppy filing by candidates. Those that were properly reported are likely violators of the state's election law.

Apparent failures to report donors' addresses:

Candidates are required to disclose the address of any donor who gives more than \$100. We have identified 5,316 contributions in calendar year 2008 where this requirement was not reported in the Board's campaign finance database.

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Apparent failure to file:

576 committees with \$1,000 or more had yet to file the disclosure reports due on July 15 of this year by October 15, as reported on the Board's database. Most of these committees did not submit any paperwork whatsoever. The rest filed "no activity" reports. The unlikelihood that committees with this much money in their coffers did not collect even a dime of interest or pay any bank fees over a six month period should prompt audits examining if these reports were correctly filed.

24 hour notices not filed

Candidates reported receiving 473 contributions in excess of \$1,000 in the ten days before the 2008 elections that they did not file 24 hour notices for.

The undersigned formally request that the New York State Board of Elections investigate these apparent violations, and if warranted, forward it to the appropriate district attorney or Attorney General for enforcement.

Enclosed with this letter, please find itemized lists of the apparent violations we identified. Please inform us via a written response of your plans for investigating these apparent overages and other apparent failures. If you have any questions, please contact us.

Sincerely,

Dick Dadey
Citizens Union

Susan Lerner
Common Cause/NY

Barbara Bartoletti
League of Women Voters/ N.Y.S.

Blair Horner
NYPIRG