

The Life of the Party: *Hard Facts on Soft Money in New York State*

A Common Cause/NY Report

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Summary of Findings

- **Soft money is booming in our state, with \$53.2 million contributed to party housekeeping accounts since 1999.**
- **By far the largest category of soft money donors is businesses, which have given \$32,176,987 since 1999 or 60.5% of all soft money contributions.** Individuals comprise the next largest category of donors having given \$10,435,074 since 1999 or 19.6% of the total. Unions come in a distant fourth, having given \$4,830,818 since 1999 or 9.1%.
- **Soft money donations are given in amounts that dwarf what would be legal if the funds were given to candidates, despite the fact that New York State has remarkably high limits on contributions.** The single largest soft money contribution made since 1999 was a check for \$705,750 given by Mayor Michael Bloomberg to the New York State Republican Committee. About 30% of all soft money comes in at amounts greater than \$50,000 (or greater than the average New Yorker's annual salary according to the Bureau of Labor statistics).
- **Elected Officials and candidates for state offices have been involved in raising soft money, further blurring the lines between campaign and non-campaign fundraising.**
- **Just two Counties – New York (Manhattan) and Albany – and the District of Columbia were the source of over 55% of all soft money raised since 1999.**
- **The top five contributions raised by the top five party committees are given by a “who’s who” list of New York’s political players.** These contributors include: *Greater New York Hospital Association Management Corp, 1199 Service Employees International Union NYS PAC, Vote Cope/NYS United Teachers, NYS Correctional Officers and Police Benevolent Association PAC, Pharmaceutical Research Management of America, Lawrence Auriana, Lewis Ranieri, National Rifle Association & more*
- **Over 93% of the total amount of soft money received since 1999 (\$49.5 Million of the total \$53.2 million) is raised by the top ten Soft Money Recipients:** *New York Republican State Committee – Housekeeping, NYS Senate Republican Campaign Committee – Housekeeping, New York State Democratic Committee (Housekeeping), Conservative Party Of NYS (Headquarters Account), Democratic Assembly Campaign Committee-Housekeeping, Republican Assembly Campaign Committee Housekeeping Account, NYS Senate Republican Campaign Committee, Democratic Senate Campaign Committee – Housekeeping, Liberal Party Of New York State*
- **Soft money committee treasurers reported that Voter Registration and Outreach constitutes only 0.1% of all soft money expenses (\$45,118),** despite being a type of expenditure frequently used to defend the need for soft money.
- **The statewide and legislative Democratic and Republican Party committees, on average, spend 48% more soft money in even numbered years than in odd numbered years.** All 212 New York State legislators are up for re-election in even numbered years.

Introduction: A Rule That's Made to be Broken

New York State's Election Law sets out numerous limitations on the size of campaign donations that contributors may give and political candidates and parties may receive. For example, no individual may give more than \$150,000 in the aggregate (*i.e.*, to all candidates and committees) in any one year. Corporations face a \$5,000 aggregate annual limit on contributions. And political party committees may accept no more than \$84,400 from any one individual or \$5,000 from any one corporation in a year.

The aim of these laws is to prevent corruption or the appearance of corruption by ensuring that our lawmakers are not beholden to wealthy special interests that can bankroll their campaigns. As prior Common Cause/NY research has documented, this goal is undermined by the fact that New York's contribution limits are extraordinarily high compared to those set by other states and the federal government.¹ But what is even more shocking about our law is that it contains a loophole that renders those limits we do have completely meaningless.

In a section of the law entitled "Exceptions," one sentence is inserted that tells the reader how to evade all of the other restrictions on giving and receiving political money. It reads:

The contribution and receipt limits of this article shall not apply to monies received and expenditures made by a party committee or constituted committee to maintain a permanent headquarters and staff and carry on ordinary activities which are not for the express purpose of promoting the candidacy of specific candidates.

N.Y. Elec. Law §14-124 (emphasis added)

In plain terms, individuals, corporations, unions and other entities seeking to evade campaign contribution limits need only give money to parties for so-called "party building" purposes. This money – commonly referred to as "soft money" – is given to parties' "housekeeping" accounts, and these contributions may be of unlimited size. Parties are not supposed to use the money to support particular candidates, but this legal barrier does not hold up in practice. New York's campaign finance law was literally made to be broken.

Common Cause/NY undertook this study in order to better understand the dimensions of the soft money loophole in our state. How much soft money is given and by whom? How much do the various party organizations receive in soft money and how do they spend it?

Our findings reveal some disturbing truths. Soft money is booming in our state, with \$53.2 million contributed to party housekeeping accounts since 1999. Candidates for state office

¹ See Arbetman, Liam, Megan Quattlebaum and Rachel Leon. "The \$2,100 Club: What New York State Political Campaigns Cost, How Much Those Costs are Rising and Who's Footing the Bill." Common Cause/NY, March 2006.

raise soft money for their parties, and donations are given in sizes that dwarf what would be legal if the funds were given directly to candidates, despite our state's remarkably high limits on contributions. Furthermore, the manner in which parties spend soft money belies the claim that these funds are used solely to support the parties and not particular candidates.

The Federal Perspective: A Lesson Learned

Soft money contributions were banned at the federal level by the Bipartisan Campaign Reform Act of 2002. The Supreme Court upheld this ban with its 2003 decision in *McConnell v. FEC*, noting the dangers of the influence of big money on the political process.

While federal and state soft money are analogous in that in both cases the term refers to huge, unlimited contributions from corporations, unions and wealthy individuals to the parties, soft money entered the system somewhat differently on the federal level than it did in New York. Federal law clearly made direct contributions from corporations and unions illegal and set limits on contribution size, but the national parties realized that a loophole allowed them to set up "non-federal" accounts ostensibly meant to fund the activities of state and local parties (and therefore not subject to federal law) but that in practice were used to help elect candidates to federal office. The accounts allowed corporations and labor unions to make unlimited contributions to national parties, under the guise that the money would be used to influence only non-federal elections. Those contributions would have been strictly illegal under the regulated "hard money" system.

By contrast, soft money at the state level is raised on a different fictional premise – that the money is not used to influence any candidate elections at all. The drafters of New York State law were not blindsided by the soft money loophole, they created it based on the idea that the money would be used only for "party building" purposes.

But while the origin of the loopholes on the state and federal levels are somewhat different, the problem is ultimately the same: the barrier between permitted and prohibited soft money expenditures does not hold up in practice and donors who give hundreds of thousands or even millions to political parties expect something in return. In its opinion in the *McConnell* case, the Supreme Court said:

Just as troubling to a functioning democracy as classic quid pro quo corruption is the danger that officeholders will decide issues not on the merits or desires of their constituencies, but according to the wishes of those who have made large financial contributions valued by the officeholder. Even if it occurs only occasionally, the potential for such undue influence is manifest. And unlike straight cash-for-votes transactions, such corruption is neither easily detected nor practical to criminalize. The best means of prevention is to identify and to remove the temptation. The evidence [in this opinion] ... convincingly demonstrates that soft money contributions to political parties carry with them just such temptation.

McConnell v. FEC, 540 U.S. 93, 153 (2003)

The Supreme Court felt that the soft money loophole on the federal level raised concerns about corruption or its appearance. The Court agreed with Congress that large contributions from entities that had business before federal government compromised, at minimum, the public's trust that their elected officials were making decisions in the best interest of the public they served. Unfortunately, our state leaders don't seem to share the same concerns.

Time for Reform

The defense of soft money is disingenuous and at odds with the facts. Whatever our state's intent when it created the loophole, soft money has become in practice a way to evade the spirit, if not the letter, of campaign finance law. Congress has passed and the Supreme Court has upheld a ban on soft money contributions. It is long past time for New York State to do the same.

Who Gives Soft Money?

To complete this study, Common Cause/NY undertook a comprehensive evaluation of disclosure reports filed by the state party committees to the New York State Board of Elections (as state law requires). Party committees file, at a minimum, two disclosure reports per calendar year, and may also file reports before and after general, primary and special elections in which they participate. The party committees maintain separate “housekeeping” or soft money committees distinct from their “reporting” or hard money committees.

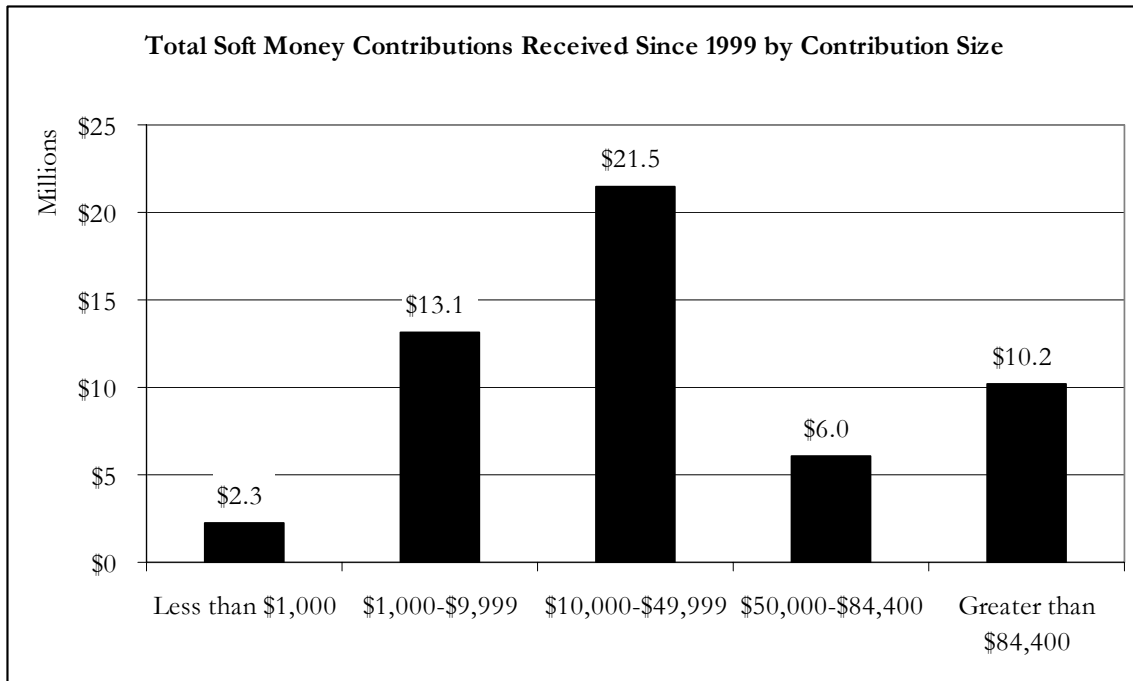
Our evaluation of this data shows that by far the largest category of soft money donors is businesses, which have given \$32,176,987 since 1999 or 60.5% of all soft money contributions. This may be because corporations face relatively low campaign contribution limits (a \$5,000 aggregate annual limit, compared to a \$150,000 aggregate annual limit for individuals) compared to other classes of donors. Individuals comprise the next largest category of donors, having contributed \$10,435,074 since 1999 or 19.6% of the total.

Unions give a relatively small portion of soft money donations - \$4,830,818 since 1999 or 9.1% of the total, though this may be explained by the fact that unincorporated unions face no aggregate annual limit on the amount of hard money campaign contributions they may give and the fact that many unions run their own get-out-the-vote efforts. Unions can give extremely high amounts of “hard” money which may reduce their incentive to make soft money contributions. However, while unions rank low overall among contributors, some of the largest single soft money contributions do, in fact, come from unions.

The remaining portion of soft money donations are given by other candidate committees (9.3%), advocacy groups (1%) and entities that we could not classify (0.4%).

Not Chump Change

Soft money donations are given in sizes that dwarf what would be legal if the funds were given to candidates, despite the fact that New York State has remarkably high limits on contributions. In fact, the largest soft money contribution made since 1999 was a check for \$705,750 given by New York City Mayor Michael Bloomberg to the New York State Republican Committee.



Not all soft money donations come in six figure sizes, yet the data shows that about 30% of all soft money comes in at amounts greater than \$50,000 (or greater than the average New Yorker’s annual salary, according to the Bureau of Labor Statistics ²). While 4.2% (\$2,255,822) of soft money is given in amounts less than \$1,000, 19.2% (\$10,229,071) is given in amounts greater than \$84,400 (the current hard money contribution limit to party committees).

Passing the Hat

Elected officials and candidates for state office have been involved in raising soft money, further blurring the lines between campaign and non-campaign fundraising.

In an example of this practice, Governor Pataki and then State Republican Party Chairman William Powers began aggressively raising a combination of soft and hard money through the “First Annual Governor’s Reception,” which they unveiled in 1996. As news reports revealed, invitations to that event, which Pataki headlined, included a handy postscript for the aspiring contribution limit avoider which said, “Please note, there are no limitations for individuals, PACs, partnerships, or corporations to the New York Republican State Committee (Housekeeping Account), i.e., a corporation can write a \$100,000 check to New York Republican State Committee with ‘Housekeeping Account’ in the memo portion of the check.”³

² Quarterly Census of Employment and Wages. U.S. Department of Labor Bureau of Labor Statistics, online at www.bls.gov.

³ Vitello, Paul. “The Give and Shake of Politics.” *Newsday*, 16 April 1996.

When candidates and elected officials are involved in soliciting soft money contributions, concerns arise that contributors are not just supporting their preferred party, but buying access and influence with these officials. That entities contributing huge sums of soft money feel that they are owed something in return is starkly illustrated by the April 1996 reception described above. Donors who gave \$100,000 to the event were given “one priority seat with Governor Pataki or Chairman Powers for Dinner at The Starlight Roof.” In addition, if that donor was a corporation, it was allowed to display its company logo or hang a banner at the reception.⁴ That means that an individual or corporation that gave a contribution that would have been illegal had they given it directly to Governor Pataki nevertheless won the right to sit with him at dinner. For a business seeking a lucrative state contract, the \$100,000 price of admission would certainly be a small price to pay for the chance to spend an evening with the state’s number one decision maker.

Governor Pataki has continued the practice of alerting donors to the presence of the soft money loophole. The invitation to the Ninth Annual Governor’s Reception reminded donors that “corporate contributions to [the] New York Republican State Committee’s housekeeping account are lawful and have no limits.”⁵

When a Limit is not a Limit

Even though there is a limit to how much an individual can contribute to a party committee, unions, PACs, corporations and wealthy individuals can still write a check of any size as long as the portion of the contribution that exceeds the limit on what may be given to the party is reported as “soft” money.

Carroll Petrie is the widow of Milton J. Petrie, retailer and philanthropist.⁶ On August 1, 2000, Mrs. Petrie wrote a check (number 10255) for \$175,000 to the New York State Republican Party. \$76,500 (the contribution limit to party committees prior to February 2003) was treated as a hard money donation while the remaining \$98,500 was treated as a soft money donation.

One Contribution – Both Hard and Soft								
Type	Committee	Date	Donor	City	State	Zip	Check Number	Amount
Hard	NEW YORK REPUBLICAN STATE COMMITTEE - REPORTING	08/01/00	CARROLL PETRIE	NEW YORK	NY	10021	10255	\$76,500.00
Soft	NEW YORK REPUBLICAN STATE COMMITTEE - HOUSEKEEPING	08/01/00	MRS. CARROLL PETRIE	NEW YORK	NY	10021	10255	\$98,500.00

⁴ Slackman, Michael. “GOP Chief: Don’t Forget Loopholes.” *Newsday*, 11 April 1996.

⁵ *Ibid.*

⁶ The Center for Public Integrity, “Contributors of \$100,000 or more to State Party Organizations in the 2000 Election Cycle,” <http://www.publicintegrity.org/report.aspx?aid=201>.

Contributions like this one demonstrate what the soft money loophole really means to parties and their supporters. Billed as a separate and necessary revenue stream, soft money accounts in fact serve as a catch-all for contributions that would otherwise be illegal.

The Biggest Contributions to the Biggest Committees⁷

Here the five largest contributions to the largest soft money committees are ranked. The individuals and organizations that make up this list read like a “who’s who” of New York’s political players, largest unions and wealthiest individuals.

DEMOCRATIC ASSEMBLY CAMPAIGN COMMITTEE-HOUSEKEEPING			
Rank	Date	Contributor	Amount
1	5/25/05	GNHYA MANAGEMENT CORP.	\$150,000
1	2/16/06	GNHYA MANAGEMENT CORP.	\$150,000
2	2/24/03	GNHYA MANAGEMENT CORP.	\$100,000
2	7/18/02	GNHYA MANAGEMENT CORP.	\$100,000
2	6/9/04	GNHYA MANAGEMENT CORP.	\$100,000
2	5/13/05	1199/SEIU NYS PAC	\$100,000
3	9/23/02	VOTE COPE / NYSUT	\$53,500
4	10/30/00	GNHYA MANAGEMENT CORP.	\$53,000
5	6/19/02	NYSOPBA PAC	\$50,000
5	10/29/04	1199/SEIU NYS PAC	\$50,000
5	10/13/04	VOTE COPE / NYSUT	\$50,000
5	9/1/04	VOTE COPE / NYSUT	\$50,000
5	11/1/04	PHARM. RESEARCH MAN. OF AMERICA	\$50,000
5	4/30/06	VOTE COPE / NYSUT	\$50,000
5	10/22/99	GNHYA MANAGEMENT CORP.	\$50,000
CONSERVATIVE PARTY OF NYS (HEADQUARTERS ACCOUNT)			
Rank	Date	Contributor	Amount
1	11/8/00	LAWRENCE AURIANA	\$133,541
2	10/23/00	LEWIS S RANIERI	\$100,000
3	10/25/00	NEW YORKERS FOR TERM LIMITS, INC.	\$75,000
4	9/1/00	NRA-INSTITUTE FOR LEGISLATIVE ACTION	\$50,000
4	5/9/02	NYSOPBA PAC	\$50,000
4	10/2/02	BELL PACKING CORP	\$50,000
5	11/1/00	LAWRENCE AURIANA	\$30,000
NEW YORK STATE DEMOCRATIC COMMITTEE (HOUSEKEEPING)			
Rank	Date	Contributor	Amount
1	10/25/02	ROBERT F SILLERMAN	\$500,000
2	10/28/03	NYC CENTRAL LABOR COUNCIL	\$178,000
3	11/3/00	EMILY'S LIST	\$100,000
3	10/11/02	ROBERT F SILLERMAN	\$100,000
3	5/24/04	AGNES VARIS	\$100,000
3	5/24/04	AGVAR CHEMICALS INC.	\$100,000
3	10/27/05	ROBERT R DYSON	\$100,000
3	11/7/05	1199 SEIU	\$100,000
3	8/18/05	VOTE/COPE OF THE NYS UNITED TEACHERS	\$100,000
3	2/21/06	1199 SEIU	\$100,000
3	4/13/06	VOTE/COPE OF THE NEW YORK STATE UNITED TEACHERS	\$100,000
3	6/29/06	VOTE/COPE OF THE NEW YORK STATE UNITED TEACHERS	\$100,000
4	9/27/01	VOTE/COPE	\$50,000
4	11/1/02	WEITZ & LUXENBERG	\$50,000
4	10/11/02	CIVIL SERVICE EMPLOYEES PAF	\$50,000
4	7/22/04	MASTERCARD INTERNATIONAL	\$50,000
4	6/9/04	PFIZER, INC.	\$50,000
4	9/9/04	VOTE/COPE OF THE NYS UNITED TEACHERS	\$50,000
4	8/22/03	AGNES VARIS	\$50,000
4	8/8/03	1199 SEIU	\$50,000
4	8/8/03	VOTE/COPE OF THE NYS UNITED TEACHERS	\$50,000
4	9/29/04	VOTE/COPE OF THE NYS UNITED TEACHERS	\$50,000
4	4/7/04	AMERICAN INT'L GROUP, INC.	\$50,000
4	12/6/05	RIENZI AND SONS, INC.	\$50,000
4	12/7/05	CIVIL SERVICE EMPLOYEES PAF	\$50,000
4	2/2/05	BERNARD L SCHWARTZ	\$50,000
4	4/13/00	NATIONAL EQUIPMENT SALES, INC.	\$50,000
4	3/16/06	RPAC OF NEW YORK STATE	\$50,000
4	4/17/06	GNHYA MANAGEMENT CORP.	\$50,000
5	10/31/01	VOTE/COPE	\$45,000
5	11/17/05	RIENZI AND SONS, INC.	\$45,000

⁷ In several reporting periods the NYS Sen. Rep. Campaign Committee, a hard money committee, reported spending or receiving soft money (schedules P and Q). Those “soft” receipts by the “hard” committee are included in this list. Additionally, this list omits contributions from candidate and party committees.

NEW YORK REPUBLICAN STATE COMMITTEE - HOUSEKEEPING			
Rank	Date	Contributor	Amount
1	10/1/01	MR. MICHAEL R. BLOOMBERG	\$705,750
2	10/3/02	MR. MICHAEL R. BLOOMBERG	\$500,000
3	10/17/05	MR. MICHAEL R. BLOOMBERG	\$400,000
3	11/4/05	MR. MICHAEL R. BLOOMBERG	\$400,000
4	11/6/00	MR. LESLIE C. QUICK, JR.	\$200,000
5	10/31/03	MR. MICHAEL R. BLOOMBERG	\$120,000
NYS SENATE REPUBLICAN CAMPAIGN COMMITTEE - HOUSEKEEPING			
Rank	Date	Contributor	Amount
1	2/9/06	GNHYA MANAGEMENT CORP.	\$150,000
1	6/2/05	GNHYA MANAGEMENT CORP.	\$150,000
2	4/1/04	EMPIRE DENTAL PAC	\$138,000
3	5/30/01	MATCO, INC.	\$100,000
3	5/15/02	GREATER NEW YORK HOSPITAL ASSOCIATION MANAGEMENT C	\$100,000
3	3/20/02	FREDDIE MAC	\$100,000
3	5/29/03	GREATER NEW YORK HOSPITAL ASSOCIATION MANAGEMENT C	\$100,000
3	10/21/04	1199 SEIU	\$100,000
3	3/4/04	GNHYA MANAGEMENT CORP.	\$100,000
3	6/2/05	EMPIRE DENTAL PAC	\$100,000
3	3/20/00	GREATER NEW YORK HOSPITAL ASSOCIATION MA	\$100,000
4	6/8/06	CABLE TELECOMMUNICATIONS ASSOC. OF NY, INC.	\$90,000
5	3/25/04	SEIU PEA INTERNATIONAL	\$84,800

Accounting by County

The \$53.2 million of soft money that has been raised since 1999 is reported to have come from at least 231 different counties across the country⁸ plus the District of Columbia. However, just 2 counties—New York (Manhattan) and Albany—and Washington, D.C. were the source of over 55% of all soft money raised during that time.

County and State	Republicans	Democrats	Minor Parties	Grand Total
NEW YORK, NEW YORK	\$10,620,640.49	\$5,353,074.63	\$3,043,005.33	\$19,016,720.45
ALBANY, NEW YORK	\$3,773,982.68	\$3,196,130.07	\$315,202.41	\$7,285,315.16
DISTRICT OF COLUMBIA, DISTRICT OF COLUMBIA	\$1,789,005.92	\$1,482,232.50	\$41,600.00	\$3,312,838.42
WESTCHESTER, NEW YORK	\$1,565,671.00	\$203,700.00	\$464,320.16	\$2,233,691.16
NASSAU, NEW YORK	\$982,762.23	\$585,788.63	\$610,211.00	\$2,178,761.86
KINGS, NEW YORK	\$330,310.00	\$261,535.00	\$1,284,466.69	\$1,876,311.69
QUEENS, NEW YORK	\$290,350.00	\$530,459.98	\$310,862.36	\$1,131,672.34
MONROE, NEW YORK	\$514,421.00	\$139,940.64	\$88,977.92	\$743,339.56
SUFFOLK, NEW YORK	\$474,868.45	\$75,943.66	\$168,890.78	\$719,702.89
FAIRFIELD, CONNECTICUT	\$366,275.00	\$147,000.00	\$112,250.00	\$625,525.00

This analysis further reinforces the conclusion that soft money contributions originate not from a diverse group of New Yorkers from all parts of our state, but an elite few located in New York City and the state capital who have an unusual capacity to give.

Half of One-Tenth of One Percent

In previous research, Common Cause/NY found that less than 1% of New Yorkers make direct political contributions to New York State campaigns.⁹ Using a similar methodology,

⁸ 1.6% or \$825,470 of the soft money raised was reported to the BOE with a blank or invalid zip code.

⁹ Arbetman, Liam, Megan Quattlebaum and Rachel Leon. "The \$2,100 Club: What New York State Political Campaigns Cost, How Much Those Costs are Rising and Who's Footing the Bill." Common Cause/NY, March 2006.

we have found that approximately one half of one-tenth of a percent (.056%) of New York's voting age population has made a soft money contribution to state or local party committee since 1999.¹⁰

¹⁰ Common Cause/NY was able to identify 7,094 separate soft money contributions made by individuals to state level party soft money committees since 1999. While we know that some donors give multiple contributions, even assuming that each of these contributions came from a separate donor provides us with 7,094 donors who gave in amounts above \$100 (the minimum amount that is itemized on state disclosure reports). We also factored in unitemized contributions (those that come in at amounts under \$100) which committees may simply lump together on their contribution reports. A total of \$48,019.71 in unitemized soft money contributions was reported since 1999. Even if we assume that each of these contributions was given in the amount of \$50 this still leaves a total of only 8,054 separate individual contributors, or 0.056% of New York State's 18 year old+ population of 14,286,350 (as estimated by the US Census Bureau in 2004).

Giving and Getting

A survey taken in January 2006 found that 58% of New Yorkers already believe that special interests have too much influence on elected officials in our state.¹¹ With so little public confidence in the system, why should citizens worry themselves over soft money in particular?

Regular New Yorkers have reason to be concerned about the soft money problem because our research has found that a number of big soft money donors are also big recipients of government largesse. For example, J.P. Morgan Chase & Company gave \$100,000 to the New York Republican State Committee's housekeeping fund in 2002, the same year it became the lead underwriter on \$1.8 billion in Metropolitan Transportation Authority Bonds. And Kawasaki Rail Car Inc. gave \$100,000 to the same committee in 2003, shortly after the company won a \$2.3 billion contract to build subway cars for the MTA in 2002.¹²

A Portrait of Four Large Soft Money Contributors

The Greater New York Hospital Association (GNYHA) represents more than 250 not-for-profit hospitals and continuing care facilities, both voluntary and public, throughout the State.¹³ GNYHA spends big in Albany and Albany spends big on hospitals. While debate rages on about whether that spending is much too much or much too little to meet hospitals' needs, it is clear that our state's hospitals depend on Albany for significant funding. According to the Manhattan Institute, New York's per-capita hospital spending is nearly three times the national average.¹⁴

Greater New York Hospital Association's Soft Money Contributions									
Committee	1999	2000	2001	2002	2003	2004	2005	2006	Grand Total
DEMOCRATIC ASSEMBLY CAMPAIGN COMMITTEE-HOUSEKEEPING	\$97,500	\$103,000	\$31,500	\$100,000	\$100,000	\$114,000	\$152,400	\$150,000	\$848,400
NYS SENATE REPUBLICAN CAMPAIGN COMMITTEE - HOUSEKEEPING			\$75,000	\$100,000	\$100,000	\$100,000	\$150,000	\$150,000	\$675,000
NEW YORK STATE DEMOCRATIC COMMITTEE (HOUSEKEEPING)	\$25,000	\$10,000	\$20,000	\$15,000	\$11,000	\$36,500	\$35,000	\$55,000	\$207,500
NYS SENATE REPUBLICAN CAMPAIGN COMMITTEE	\$65,000	\$128,000							\$193,000

¹¹ Empire Center for New York State Policy. "Ready for Change: A Statewide New York Voter Survey," January 2006.

¹² Cooper, Michael. "Political Donations Pour Through Gap in New York Laws." *New York Times*, 17 February 2005.

¹³ www.gynha.org

¹⁴ Herrick, Devon. "Fraud and Waste Infect New York Medicaid." *Health Care News*, 1 September 2005.

Greater New York Hospital Association' s Soft Money Contributions									
Committee	1999	2000	2001	2002	2003	2004	2005	2006	Grand Total
NEW YORK REPUBLICAN STATE COMMITTEE - HOUSEKEEPING	\$500		\$20,500	\$60,000	\$20,000	\$15,000	\$11,000		\$127,000
DEMOCRATIC SENATE CAMPAIGN COMMITTEE - HOUSEKEEPING					\$1,000	\$1,000			\$2,000
NEW YORK COUNTY DEMOCRATIC COMMITTEE							\$1,500		\$1,500
REPUBLICAN ASSEMBLY CAMPAIGN COMMITTEE HOUSEKEEPING ACCOUNT	\$500								\$500
Grand Total	\$188,500	\$241,000	\$147,000	\$275,000	\$232,000	\$266,500	\$349,900	\$355,000	\$2,054,900

Service Employees Union Local 1199 is a union representing 225,000 health care workers statewide and a large soft money donor. When the Health Care Reform Act (a measure passed in 1996 that was meant to deregulate the hospital sector) was renewed in 2002, Governor Pataki, then courting the endorsement of this powerful union, agreed to increase payments to hospitals and nursing homes by \$1.8 billion. He used one-time revenue created by the stock sale when Empire Blue Cross won approval to become for-profit. This money was then used almost entirely as raises for the healthcare workers represented by 1199.¹⁵

Service Employees Union Local 1199' s Soft Money Contributions									
Committee	1999	2000	2001	2002	2003	2004	2005	2006	Grand Total
NEW YORK STATE DEMOCRATIC COMMITTEE (HOUSEKEEPING)					\$65,000	\$80,000	\$127,500	\$100,000	\$372,500
WORKING FAMILIES PARTY					\$205,000	\$10,000	\$122,000		\$337,000
NYS SENATE REPUBLICAN CAMPAIGN COMMITTEE - HOUSEKEEPING				\$76,500	\$5,000	\$150,000			\$231,500
DEMOCRATIC ASSEMBLY CAMPAIGN COMMITTEE- HOUSEKEEPING	\$25,000					\$51,000	\$101,000		\$177,000
NYS SENATE REPUBLICAN CAMPAIGN COMMITTEE		\$37,500							\$37,500
KINGS COUNTY DEMOCRATIC COUNTY COMMITTEE							\$2,500	\$15,000	\$17,500
DEMOCRATIC ORGANIZATION OF QUEENS COUNTY								\$10,000	\$10,000
Grand Total	\$25,000	\$37,500		\$76,500	\$275,000	\$291,000	\$353,000	\$125,000	\$1,183,000

¹⁵ Common Cause/NY. "Poor State Budget Process Leads to Gridlock and Dysfunction." Connect the Dots report, July 2005.

Kawasaki Rail Car, Inc. is a Japanese company that has enjoyed big MTA contracts for the past two decades¹⁶ and especially under the Pataki administration. In 2003 the company, with a partner, won a \$2.3 billion contract with the MTA¹⁷ to build new subway cars. Kawasaki has given over \$400,000 in soft money to the State and Senate Republican committees.

Kawasaki Rail Car, Inc' s Soft Money Contributions									
Committee	1999	2000	2001	2002	2003	2004	2005	2006	Grand Total
NEW YORK REPUBLICAN STATE COMMITTEE - HOUSEKEEPING			\$80,000	\$90,000	\$30,000	\$100,000			\$300,000
NYS SENATE REPUBLICAN CAMPAIGN COMMITTEE - HOUSEKEEPING					\$25,000	\$30,000	\$30,000	\$30,000	\$115,000
NYS SENATE REPUBLICAN CAMPAIGN COMMITTEE		\$25,000							\$25,000
Grand Total		\$25,000	\$80,000	\$90,000	\$55,000	\$130,000	\$30,000	\$30,000	\$440,000

Parsons Transportation Group Inc. (PTG), a transportation logistics company, received a lucrative contract in 2003 to become the program manager for the MTA's communications-based train control system. The system, initially installed along the L Train line, will eventually be exported throughout the entire subway system.¹⁸ PTG and its parent company, Parsons Brinckerhoff, have contributed over \$500,000 in soft money since 1999.

Parsons Transportation Group Inc. ' s Soft Money Contributions									
Committee	1999	2000	2001	2002	2003	2004	2005	2006	Grand Total
NEW YORK REPUBLICAN STATE COMMITTEE - HOUSEKEEPING	\$35,000	\$10,000	\$60,000	\$100,000	\$90,000	\$100,000	\$12,000	\$90,000	\$497,000
NYS SENATE REPUBLICAN CAMPAIGN COMMITTEE		\$26,000							\$26,000
NYS SENATE REPUBLICAN CAMPAIGN COMMITTEE - HOUSEKEEPING				\$1,000					\$1,000
ONONDAGA COUNTY REPUBLICAN COMMITTEE HOUSEKEEPING								\$250	\$250
Grand Total	\$35,000	\$36,000	\$60,000	\$101,000	\$90,000	\$100,000	\$12,000	\$90,250	\$524,250

¹⁶ McGeehan, Patrick. "Port Authority to Replace PATH Fleet for \$499 Million." *The New York Times*. 1 April 2005.

¹⁷ Cooper, Michael. "Political Donations Pour Through Gap in New York Laws." *New York Times*, 17 February 2005.

¹⁸ Friedman, Dan. "Going Our Way." *New York Construction*. May 2003.

Who Gets Soft Money?

Since 1999, state and local party committees in New York have raised a total of \$53,173,097 in soft money. Republican committees raised more soft money than their Democratic counterparts – 57.7% of the total raised by all soft money committees compared to 26.9% for Democrats. The one exception to this trend is local Democratic committees, which have raised more soft money than their Republican counterparts.

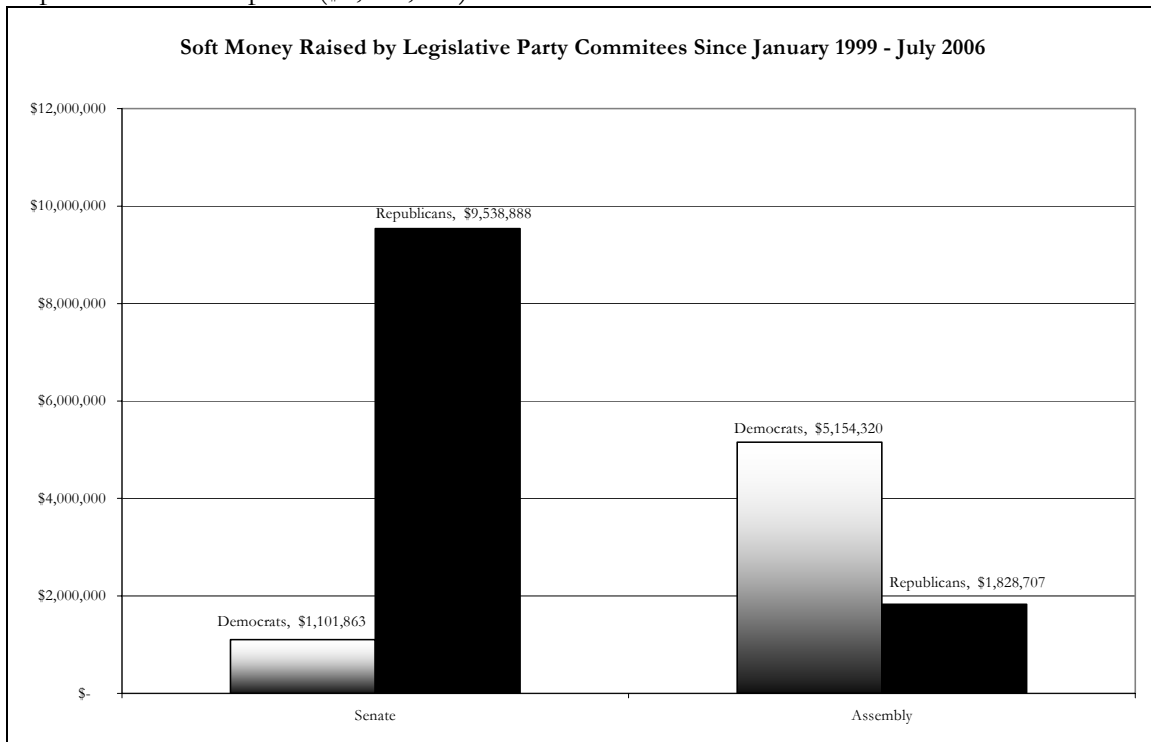
As a whole, Republican committees get a larger portion of their soft money contributions from businesses (70.4%) than do Democratic committees (51.6%). Conversely, a greater percentage of Democratic committee soft money receipts come from unions (20.3%) than do Republican receipts (4.1%).

Top Ten Party Committees Ranked by Soft Money Receipts							
Party Committee	Businesses	Individuals	Unions	Parties & Candidates	Advocacy Groups	Unidentified	Total
NEW YORK REPUBLICAN STATE COMMITTEE - HOUSEKEEPING	\$11,599,308	\$5,523,102	\$50,750	\$1,165,952	\$18,000	\$19,287	\$18,376,398
NYS SENATE REPUBLICAN CAMPAIGN COMMITTEE - HOUSEKEEPING	\$6,521,284	\$137,200	\$897,900	\$10,000	\$6,000	\$26,000	\$7,598,384
NEW YORK STATE DEMOCRATIC COMMITTEE (HOUSEKEEPING)	\$2,494,826	\$1,464,385	\$1,793,830	\$519,636	\$210,750	\$5,000	\$6,488,426
CONSERVATIVE PARTY OF NYS (HEADQUARTERS ACCOUNT)	\$2,638,403	\$1,744,865	\$182,496	\$1,174,823	\$260,403	\$22,600	\$6,023,590
DEMOCRATIC ASSEMBLY CAMPAIGN COMMITTEE-HOUSEKEEPING	\$3,650,851	\$31,169	\$917,050	\$261,000	\$7,500		\$4,867,570
REPUBLICAN ASSEMBLY CAMPAIGN COMMITTEE HOUSEKEEPING ACCOUNT	\$1,467,901	\$252,470	\$52,650	\$16,100	\$20,950	\$525	\$1,810,595
NYS SENATE REPUBLICAN CAMPAIGN COMMITTEE	\$1,219,650	\$89,750	\$223,500		\$26,000	\$96,500	\$1,655,400

Top Ten Party Committees Ranked by Soft Money Receipts							
Party Committee	Businesses	Individuals	Unions	Parties & Candidates	Advocacy Groups	Unidentified	Total
DEMOCRATIC SENATE CAMPAIGN COMMITTEE - HOUSEKEEPING	\$535,161	\$66,800	\$56,400	\$442,283	\$900	\$320	\$1,101,863
LIBERAL PARTY OF NEW YORK STATE	\$378,000	\$311,816	\$33,250	\$315,500	\$500	\$25,500	\$1,064,566
DEMOCRATIC ORGANIZATION OF QUEENS COUNTY	\$140,292	\$182,630	\$66,350	\$136,705	\$1,300	\$2,105	\$529,382
Total	\$30,645,676	\$9,804,186	\$4,274,176	\$4,041,997	\$552,303	\$197,837	\$49,516,175

It is interesting to note that over 93% of the total amount of soft money received since 1999 (\$49.5 million of the total \$53.2 million) is raised by the top 10 soft money recipients. The remaining 59 committees (most of them local party committees) account for less than 7% of soft money raised.

A look at the top 10 soft money recipients shows that, where legislative committees are concerned, committees for the majority parties raise more soft money than their minority party counterparts. For example, the Senate Republicans (the majority party in that house) raised \$9,538,888 since 1999 compared to only \$1,101,863 for Senate Democrats. The trend is similar in the Assembly, where majority Democrats raised more (\$5,154,320) than their Republican counterparts (\$1,828,707).



How is Soft Money Used?

Thus far, we have focused on the first major problem with soft money – the fact that officeholders and candidates are involved in the raising of unlimited contributions from wealthy individuals and special interests with business before government. The size of these contributions, their origin and the fact that current or hopeful elected officials are involved in soliciting them raise serious concerns about the potential for corruption or its appearance.

The second major problem is that while the theory behind our state’s soft money loophole is that these funds will be used only for party building purposes and not for candidate elections, this legal barrier does not hold up in practice.

A review of soft money expenditures by expense type shows that the costs of maintaining an office and staff, when combined together, consume the second largest portion of soft money expenses at \$18,014,161.¹⁹ By contrast, voter registration and outreach – a type of expenditure that is frequently used to defend the need for soft money – consumes only 0.1% (\$45,118) of soft money expenses – a miniscule portion.

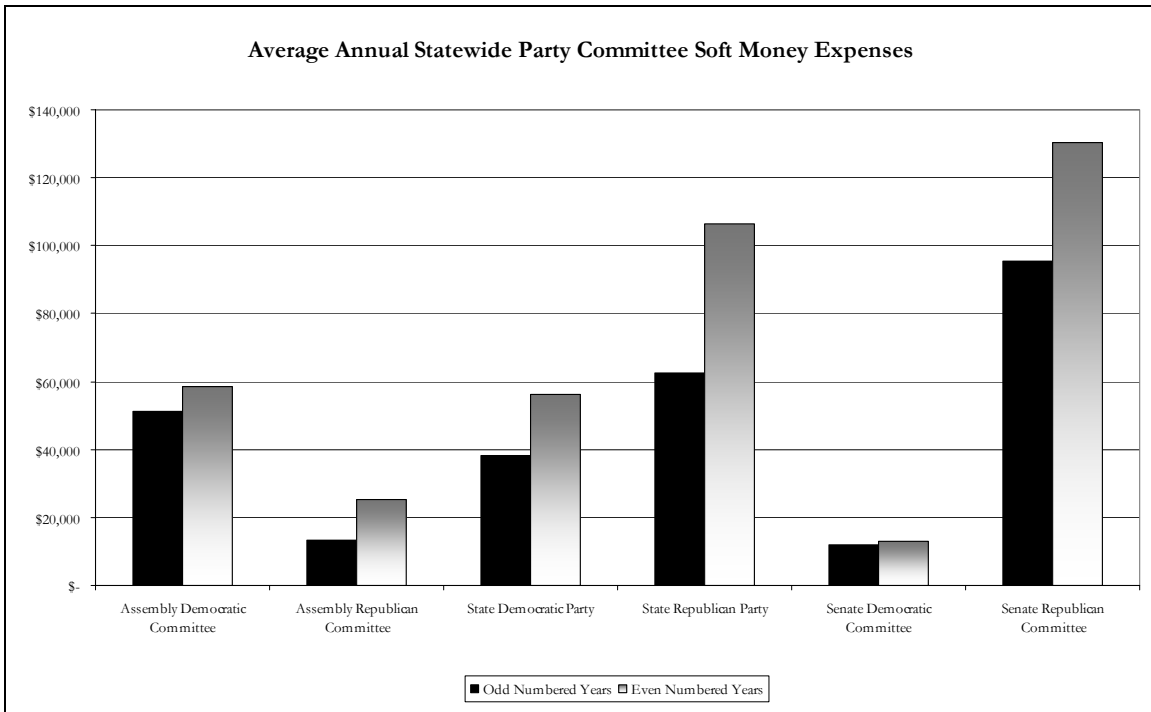
Breakdown of Soft Money Expenses by Expense Type	
Reported Expense Purpose	Amount
Other	\$18,180,580.22
Payroll/Wages	\$9,179,965.31
Office Expenses	\$6,379,509.75
Professional Services	\$4,649,886.80
Mailings	\$2,536,060.55
Office Rent	\$1,707,869.50
Political Consultants	\$1,029,250.00
Postage	\$795,685.42
Utilities	\$746,817.05
Un-Reported	\$461,457.59
Fundraising Expenses	\$186,119.49
Contributions	\$57,650.00
Voter Registration/Outreach	\$45,118.60
Television Ads	\$2,720.00

It is interesting to note that the largest category of soft money expenses is the amorphous “other” category. Unless a party committee treasurer chooses to include a clear explanation of the purpose of these expenses in the “explanation” field of the Board of Elections disclosure form, we know virtually nothing about how these “other” expenses were actually used without analyzing each expense individually.

¹⁹ This figure represents the sum of “Office Expenses,” “Rent,” “Utilities” and “Payroll.”

The above breakdown of types of expenses was created using the “purpose codes” associated with each soft money expense as reported by committee treasurers and/or their staff. The purpose codes are prescribed by the New York State Board of Elections (NYSBOE) in its *Handbook of Instructions for Campaign Financial Disclosure*. The codes and their descriptions are included in Appendix E at the end of this report. It should be noted that the treasurers for many of the committees failed to report at least some of their expenses according the NYSBOE’s guidelines. Therefore, the above analysis of how the treasurers reported spending “housekeeping” funds is useful primarily as an overview. A clearer picture of how soft money is used emerges when one examines specific expenses in detail.

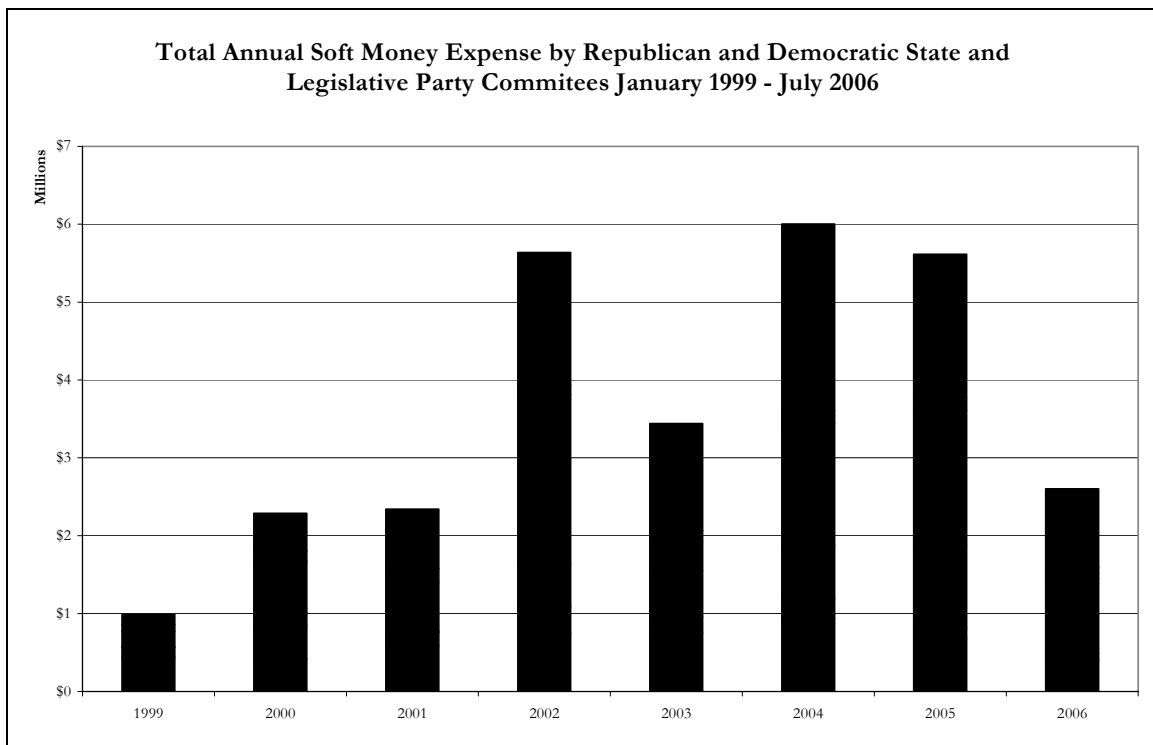
The statewide and legislative Democratic and Republican party committees, on average, spend 48% more soft money in even numbered years than in odd numbered years. All 212 New York State Legislators are up for re-election in even numbered years.



One soft money expense that demonstrates the blurred line between “party building” and candidate support is polling costs. Several housekeeping committees state outright on their disclosure reports the some specific soft money expenditures were for polling. The New York State Senate Republican Campaign “Housekeeping” Committee has spent \$1,237,540.49 on polling since 1999, and unsurprisingly, more of this sum is spent during election years than during non-election years. The Senate Republican’s soft money committee has reported spending twice as much as their hard money committee has reported spending on polling. These soft money expenses were reported as “other” in the purpose code field and “poll”, “polls” or “polling” in the explanation field.

The Democratic Assembly Campaign Committee (DACC)'s approach would seem to be the opposite. While the committee does not classify any specific soft money expenses as polling expenses, it does pay a substantial amount of money to the same firms that its hard money account pays for polling expenses. However, the DACC appears to spend more hard money on polling than soft money. DACC has reported spending \$1,880,447.45 of hard money on polling expenses since 1999, while their soft money account reported spending \$739,110.06 to the same firms in the same time period. These soft money expenses were reported as "office expenses" in the purpose field and the explanation field was left blank.

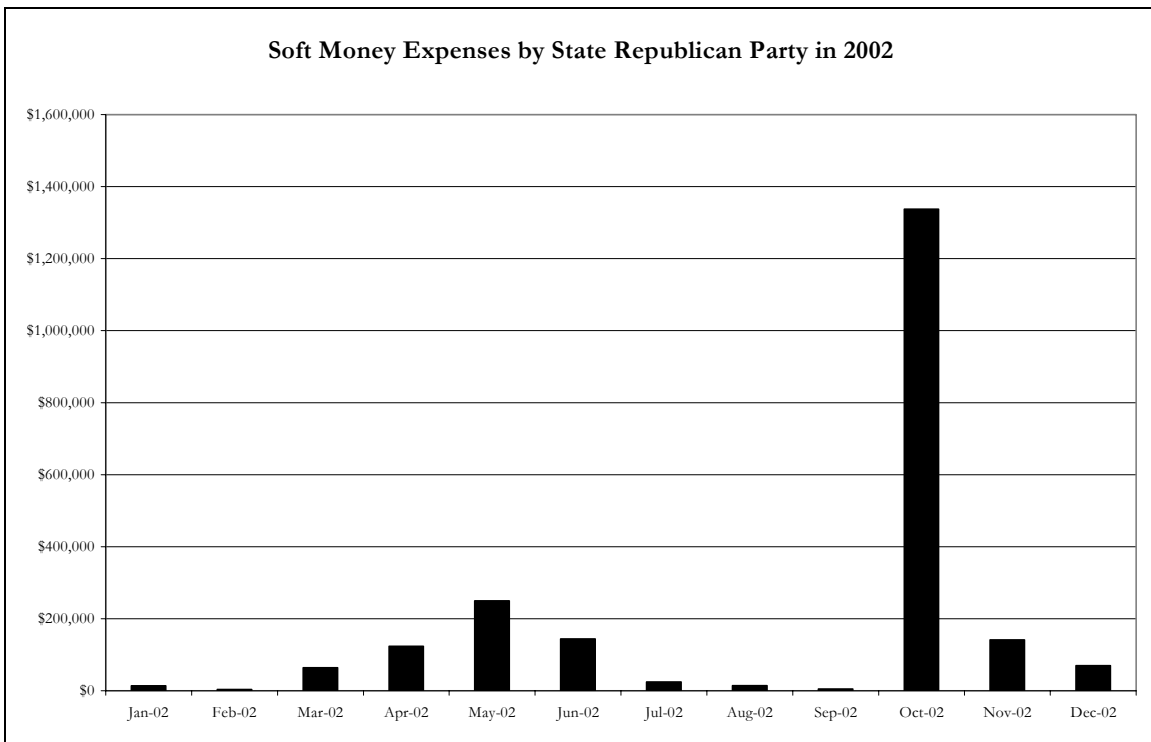
While using soft money to pay for polling expenses would only violate state law if the polls were determined to be "for the express purpose of promoting the candidacy of specific candidates," it is easy to imagine how even broadly worded polls addressing issues of concern to the party might benefit candidates quite directly. Furthermore, a lack of oversight from the Board of Elections means that parties are essentially their own umpires when determining which expenses meet the statutory requirement that they be considered hard money contributions and which do not.



In addition to covering polling costs, Common Cause/NY analysis also shows that, during the height of the election season, money is often expended out of soft money accounts on or near the same day that hard money committees expend money to the same vendor.

The 2002 Example

In 2002, incumbent Republican Governor George Pataki successfully ran for his third gubernatorial term. He faced two general election challengers, H. Carl McCall on the Democratic line and billionaire Rochester businessman Tom Golisano on the Independence line. Their race made for the most expensive gubernatorial election in New York State history. All together the candidates on the general election ballot spent over \$140 million during the campaign cycle²⁰. That same year, the New York Republican State Committee – Housekeeping committee reported the largest annual expenditure by any soft money party committee since at least 1999²¹. Of the nearly \$2.2 million in soft money they spent that year, over 61% was spent in the month immediately preceding the November election.



Some specific soft money expenses made by the Republican Party seem to have complemented the committee’s hard money expenses that year. For example, on October 24, 2002, the hard and soft money committees of the New York State Republican Party combined reported paying almost \$820,000 to two firms—DCI Group, LLC and FYI Messaging, LLC—both located at the same Arizona address. The hard money committee reported the expenses as “campaign mailings” while the soft money committee reported the expenses as “mailings.”

²⁰ Arbetman, Liam, Megan Quattlebaum and Rachel Leon. “The \$2,100 Club: What New York State Political Campaigns Cost, How Much Those Costs are Rising and Who’s Footing the Bill.” Common Cause/NY, March 2006.

²¹ This report only examined soft money accounts that have filed electronically. State party committees were required to file electronically starting in 1999. Therefore no comparisons to earlier years can be made.

Committee	Date	Payee	Amount	Purpose Code
NEW YORK REPUBLICAN STATE COMMITTEE - REPORTING	10/24/02	DCI GROUP, LLC 7320 N. DREAMY DRAW DRIVE PHOENIX, AZ 85020	\$54,883.30	CMAIL
NEW YORK REPUBLICAN STATE COMMITTEE - HOUSEKEEPING	10/24/02	DCI GROUP, LLC 7320 N. DREAMY DRAW DRIVE PHOENIX, AZ 85020	\$72,467.74	MAILS
NEW YORK REPUBLICAN STATE COMMITTEE - REPORTING	10/24/02	FYI MESSAGING, LLC 7320 N. DREAMY DRAW DRIVE PHOENIX, AZ 85020	\$497,944.89	CMAIL
NEW YORK REPUBLICAN STATE COMMITTEE - HOUSEKEEPING	10/24/02	FYI MESSAGING, LLC 7320 N. DREAMY DRAW DRIVE PHOENIX, AZ 85020	\$192,831.32	MAILS

Additionally, in October and November of 2002, Friends of Pataki spent almost \$3.5 million on radio ads from a firm called Target Enterprises, LTD of Encino, California. The hard money committee of the Republican Party kicked in an additional \$150,000 for television ads from the same firm. Meanwhile, that same week the soft money committee of the Republican Party spent \$375,000 on what it reported as “issue ads” from the very same firm.

Committee	Date	Payee	Amount	Purpose Code
FRIENDS OF PATAKI	10/23/02	TARGET ENTERPRISES, LTD. 16501 VENTURA BLVD., SUITE 515 ENCINO, CA 91436	\$3,016,950.00	Radio
FRIENDS OF PATAKI	10/28/02	TARGET ENTERPRISES, LTD. 16501 VENTURA BLVD., SUITE 515 ENCINO, CA 91436	\$1,489.53	Radio
FRIENDS OF PATAKI	10/28/02	TARGET ENTERPRISES, LTD. 16501 VENTURA BLVD., SUITE 515 ENCINO, CA 91436	\$12,900.00	Radio
FRIENDS OF PATAKI	10/28/02	TARGET ENTERPRISES, LTD. 16501 VENTURA BLVD., SUITE 515 ENCINO, CA 91436	\$4,460.61	Radio
FRIENDS OF PATAKI	10/28/02	TARGET ENTERPRISES, LTD. 16501 VENTURA BLVD., SUITE 515 ENCINO, CA 91436	\$26,162.56	Radio
FRIENDS OF PATAKI	10/29/02	TARGET ENTERPRISES, LTD. 16501 VENTURA BLVD., SUITE 515 ENCINO, CA 91436	\$200,000.00	Radio
FRIENDS OF PATAKI	10/31/02	TARGET ENTERPRISES, LTD. 16501 VENTURA BLVD., SUITE 515 ENCINO, CA 91436	\$8,396.79	Radio
FRIENDS OF PATAKI	10/31/02	TARGET ENTERPRISES, LTD. 16501 VENTURA BLVD., SUITE 515 ENCINO, CA 91436	\$15,844.98	Radio
FRIENDS OF PATAKI	11/1/02	TARGET ENTERPRISES, LTD. 16501 VENTURA BLVD., SUITE 515 ENCINO, CA 91436	\$25,000.00	Radio
FRIENDS OF PATAKI	11/1/02	TARGET ENTERPRISES, LTD. 16501 VENTURA BLVD., SUITE 515 ENCINO, CA 91436	\$100,000.00	Radio
FRIENDS OF PATAKI	11/4/02	TARGET ENTERPRISES, LTD. 16501 VENTURA BLVD., SUITE 515 ENCINO, CA 91436	\$76,000.00	Radio
NEW YORK REPUBLICAN STATE COMMITTEE - REPORTING	10/25/02	TARGET ENTERPRISES 16501 VENTURA BOULEVARD ENCINO, CA 91436	\$150,000.00	TVADS
NEW YORK REPUBLICAN STATE COMMITTEE - HOUSEKEEPING	10/25/02	TARGET ENTERPRISES, LTD. 16501 VENTURA BOULEVARD ENCINO, CA 91436	\$350,000.00	Other (issue ads)
NEW YORK REPUBLICAN STATE COMMITTEE - HOUSEKEEPING	10/28/02	TARGET ENTERPRISES, LTD. 16501 VENTURA BOULEVARD ENCINO, CA 91436	\$25,000.00	Other (issue ads)

Friends of Pataki also spent over \$65,000 on campaign literature from Majority Strategies of Columbus, Ohio. That same week, the soft money committee of the Republican Party spent almost \$650,000 on mailings from the same firm.

Committee	Date	Payee	Amount	Purpose Code
FRIENDS OF PATAKI	10/28/02	MAJORITY STRATEGIES 274 MARCONI BOULEVARD SUITE 260 COLUMBUS, OH 43215	\$5,850.00	Liter
FRIENDS OF PATAKI	10/28/02	MAJORITY STRATEGIES 274 MARCONI BOULEVARD SUITE 260 COLUMBUS, OH 43215	\$13,200.00	Liter
FRIENDS OF PATAKI	10/28/02	MAJORITY STRATEGIES 274 MARCONI BOULEVARD SUITE 260 COLUMBUS, OH 43215	\$10,900.00	Liter
FRIENDS OF PATAKI	10/28/02	MAJORITY STRATEGIES 274 MARCONI BOULEVARD SUITE 260 COLUMBUS, OH 43215	\$23,808.80	Liter
FRIENDS OF PATAKI	10/28/02	MAJORITY STRATEGIES 274 MARCONI BOULEVARD SUITE 260 COLUMBUS, OH 43215	\$1,150.37	Liter
FRIENDS OF PATAKI	10/31/02	MAJORITY STRATEGIES 274 MARCONI BOULEVARD SUITE 260 COLUMBUS, OH 43215	\$3,850.00	Liter
FRIENDS OF PATAKI	10/31/02	MAJORITY STRATEGIES 274 MARCONI BOULEVARD SUITE 260 COLUMBUS, OH 43215	\$7,100.00	Liter
NEW YORK REPUBLICAN STATE COMMITTEE - HOUSEKEEPING	10/24/02	MAJORITY STRATEGIES, INC. 274 MARCONI BOULEVARD COLUMBUS, OH 43215	\$647,215.09	MAILS

The prevalence of these types of expenditures strains the public’s ability to believe that the parties’ supposedly non-campaign related activities are entirely intended to build the party rather than support particular candidates. Furthermore, even in cases where the parties do not seem to coordinate their soft money expenditures with candidate campaigns, the mere fact that political parties are able to shoulder some of the administrative burdens that candidates would otherwise have to bear means that soft money frees up candidates’ funds and leaves them with more money for direct campaign expenditures.

Housekeeping Housekeeper

Some soft money expenses raise questions about whether parties aren’t using these accounts to pay for things that fail to meet the definition of a party *or* a campaign expense. As with New York State legislative campaigns²² the largest category of expenditures for New York State soft money accounts is not mailings, advertising, payroll or voter outreach but the amorphous “other” category. Past Common Cause/NY research has determined that many candidates use their campaign funds to pay expenses that appear to be personal in nature, and it seems that soft money is at least occasionally used in the same way.

²² See Arbetman, Liam, Megan Quattlebaum and Rachel Leon. “The \$2,100 Club: What New York State Political Campaigns Cost, How Much Those Costs are Rising and Who’s Footing the Bill.” Common Cause/NY, March 2006.

In February 2005, for example, reporters revealed that the State Republican Party was paying \$50,000 a year to retain a personal assistant for New York's First Lady Libby Pataki. The assistant had been paid by the party since 1999. Subsequent reporting revealed that the party had also reimbursed the assistant for \$40,000 in travel and other expenses, and while the Governor and his wife insisted that the assistant's duties were related to Mrs. Pataki's role as a party booster, the press reports claimed that she grocery shopped for the family, performed household chores and delivered food to the Patakis' home.²³

²³ Cooper, Michael. "G.O.P. Pays Mrs. Pataki's Personal Assistant." *New York Times*, 1 February 2005. See also Cooper, Michael and Mike McIntire. "Pataki Concedes That an Aide Paid by Party Delivered Food." *New York Times*, 4 February 2005. Cooper, Michael. "Salary for Mrs. Pataki's Aide Worries State G.O.P." *New York Times*, 3 February 2005. Associated Press. "Grocer Says G.O.P Aide Buys Food for Patakis." *New York Times*, 2 February 2005.

Recommendations

Of the soft money problem on the federal level, Common Cause said, “The myth of soft money is that it is contributed and spent for what is euphemistically called “party building” purposes that are unrelated to influencing federal elections. But this premise is little more than a widely acknowledged legal fiction which should not be taken seriously. Soft money corrupts for a simple and obvious reason. Soft money donations are given in such huge amounts - \$50,000, \$100,000 or more – that the donors typically expect to receive something in return for their investment.”²⁴

These points apply to soft money here in our state, but our leaders lack an appetite for reform. BCRA addressed the practice of state and national parties using soft money to directly fund federal campaigns. But there remain state law leaves the door wide open for parties to raise and spend soft money locally. **The potential it creates for corruption or its appearance means that New York State leaders must ban soft money.** This ban must state clearly that political parties may not raise any money outside of the contribution limits and source prohibitions contained in state law. In addition, state candidates and officeholders must be expressly prohibited from soliciting these types of funds.

Common Cause/NY is not the only group to have called for reform of our campaign finance system, nor is the demand new. In 1990, the New York State Commission on Government Integrity, headed by John D. Feerick, issued a report that stated that “Campaign finance laws in New York are a disgrace. They impose minimal limitations and are not vigorously enforced resulting in not only corruption and the appearance of impropriety, but voter skepticism about the electoral process itself.”²⁵

The commission was formed in 1987 by Governor Cuomo after a series of corruption scandals rocked New York City, the State Legislature and governments elsewhere in the state. Sixteen years after the release of the report, New York City can now claim a landmark system of public financing of local elections while on the state level nothing has changed.

In July 2006, the Brennan Center for Justice at the NYU School of Law released a report which found that our state’s campaign finance laws are among the weakest in the nation. The report noted that, “thirteen states have no campaign finance regulation other than disclosure requirements. But, among the remaining systems ostensibly designed to control the grip of moneyed interests on elected officials, New York’s is a farce.”²⁶

²⁴ www.commoncause.org

²⁵ New York State Commission on Government Integrity. “Restoring the Public Trust: A Blueprint for Government Integrity, Volumes I and II.” September, 1990.

²⁶ Novak, Suzanne and Seema Shah. “Paper Thin: The Flimsy Façade of Campaign Finance Laws in New York.” The Brennan Center for Justice at the NYU School of Law, July 2006.

As we have noted throughout this report, even the regulated, “hard” money portion of New York State campaign finance law is incredibly weak. State leaders must undertake a thoroughgoing reform of the entire campaign finance system by among other things:

- **Dramatically lowering contribution limits.**
- **Closing the legal entities loophole.** The loophole that allows corporations to circumvent New York's \$5,000 annual aggregate corporate limit by funneling contributions through subsidiaries should be eliminated.
- **Closing the limited liability corporation loophole.** The facet of New York State law that treats LLC's as individual for the purpose of their campaign contributing, allowing them to give up to \$150,000 annually rather than the \$5,000 limit for corporations is senseless and out of step with the federal government which treats these entities more rationally.
- **Expanding disclosure.** The state should require disclosure of the name of the employer and the occupation of the contributor.
- **Strengthening enforcement.** Create a new enforcement agency with the power to crack down on election law "scofflaws."
- **Limiting the use of campaign contributions to those activities directly involved in campaigning.** New York State law not only allows the use of campaign contributions for purposes relating to a candidacy, but also to spending relating to an official's role as a public or party official. This loophole allows incumbents - who are rarely challenged in elections - to use campaign donations for essentially personal uses, even long after they have left office. This loophole should be closed.
- **Finally, the state should create a system of voluntary public financing of elections.** Though different in different states and localities, public financing systems allow candidates who have demonstrated broad-based support for their campaigns to collect public funds to help them run their elections. In New York City, for example, contributions up to \$250 are matched at a rate of 4 to 1 with public funds. This system maximizes the value of small contributions and allows candidates to run successful campaigns without having to rely on special interests and elite, big money donors. In exchange for receiving public funds, candidates must agree to expenditure limits, which helps to hold down the cost of campaigns and level the playing field so that candidates compete in a war of ideas rather than a war of campaign dollars.

However, as this report makes clear, our campaign finance system can never truly be considered reformed so long as the soft money loophole allows political parties to violate whatever contribution and expenditure limits we establish. Among our campaign finance law's many disgraceful elements, soft money must be ranked as the most egregious. It is a \$53 million loophole that renders the regulations we do have functionally meaningless.

The same considerations that led the Congress to remove the taint of soft money from federal elections should lead our state legislature to ban soft money in New York.

Appendix A: Methodology

This report examined the soft money expenses and receipts of the party committees that have filed disclosure reports using the New York State Board of Elections' (NYSBOE) electronic filing system since 1999. Soft money receipts and expenses are reported on schedules P and Q, respectively. While most party committees maintain a distinct and separate "housekeeping" committee, at times the "hard money" party committees have filed schedule P's and Q's, and those filings are included in this report.

The data contained in this report was downloaded as ASCII delimited data files from the New York State Board of Elections website and imported into a database. The filings submitted to the Board of Elections have numerous and varied flaws that result from a combination of poor data entry, misunderstandings of disclosure regulations and genuine mistakes. For the purposes of this report, except in instances where glaring mistakes were noticed by our researchers, data is presumed to be correct as reported to and by the Board of Elections.

For the purpose of this report, "businesses" refers to corporations, limited liability corporations, partnerships, law firms, and certain professional associations such as the New York State Trial Lawyers, the Medical Society of State of New York, real estate associations, contractors associations, etc.

BOARD OF ELECTIONS DATA ACCURACY DISCLAIMER: The majority of financial disclosure statements filed at the State Board are entered into the database directly from e-mail or diskette filings submitted by committee treasurers or candidates. The information contained in paper filings will be entered into the database exactly as it appears on the forms. Because database searches retrieve information exactly the way it is reported and then entered into the database, search results may be inaccurate and/or incomplete. This will occur, for example, if filers do not adhere to the required format, do not use the proper codes, misspell words or leave items blank. Although the State Board carefully reviews disclosure reports and requires treasurers to submit amended reports as needed, there will necessarily be delays before the review process is completed and the information in the database is corrected.

Appendix B: Largest Soft Money Committees by Donor Type

Committee	Businesses	Individuals	Parties & Candidates	Union	Advocacy Groups	Unidentified	Grand Total
NEW YORK REPUBLICAN STATE COMMITTEE - HOUSEKEEPING	\$11,599,308	\$5,523,102	\$1,165,952	\$50,750	\$18,000	\$19,287	\$18,376,398
NYS SENATE REPUBLICAN CAMPAIGN COMMITTEE - HOUSEKEEPING	\$6,521,284	\$137,200	\$10,000	\$897,900	\$6,000	\$26,000	\$7,598,384
NEW YORK STATE DEMOCRATIC COMMITTEE (HOUSEKEEPING)	\$2,494,826	\$1,464,385	\$519,636	\$1,793,830	\$210,750	\$5,000	\$6,488,426
CONSERVATIVE PARTY OF NYS (HEADQUARTERS ACCOUNT)	\$2,638,403	\$1,744,865	\$1,174,823	\$182,496	\$260,403	\$22,600	\$6,023,590
DEMOCRATIC ASSEMBLY CAMPAIGN COMMITTEE- HOUSEKEEPING	\$3,650,851	\$31,169	\$261,000	\$917,050	\$7,500		\$4,867,570
REPUBLICAN ASSEMBLY CAMPAIGN COMMITTEE HOUSEKEEPING ACCOUNT	\$1,467,901	\$252,470	\$16,100	\$52,650	\$20,950	\$525	\$1,810,595
NYS SENATE REPUBLICAN CAMPAIGN COMMITTEE	\$1,219,650	\$89,750		\$223,500	\$26,000	\$96,500	\$1,655,400
DEMOCRATIC SENATE CAMPAIGN COMMITTEE - HOUSEKEEPING	\$535,161	\$66,800	\$442,283	\$56,400	\$900	\$320	\$1,101,863
LIBERAL PARTY OF NEW YORK STATE	\$378,000	\$311,816	\$315,500	\$33,250	\$500	\$25,500	\$1,064,566
DEMOCRATIC ORGANIZATION OF QUEENS COUNTY	\$140,292	\$182,630	\$136,705	\$66,350	\$1,300	\$2,105	\$529,382
WORKING FAMILIES PARTY	\$50,000			\$456,000			\$506,000
KINGS COUNTY DEMOCRATIC COUNTY COMMITTEE	\$141,482	\$99,900	\$103,850	\$41,125	\$2,000	\$2,500	\$390,857
NASSAU COUNTY DEMOCRATIC COMMITTEE HOUSEKEEPING ACCOUNT	\$28,182		\$286,359				\$314,541
DEMOCRATIC ASSEMBLY CAMPAIGN COMM.- HOUSEKEEPING CONFERENCE	\$280,500	\$6,250					\$286,750
NYS SENATE REPUBLICAN CONFERENCE COMMITTEE (HOUSEKEEPING)	\$282,703	\$1,400			\$1,000		\$285,103
NATIONAL REPUBLICAN SENATORIAL COMMITTEE	\$250,000						\$250,000
CONS PARTY OF NYS (ALBANY ACCOUNT)	\$56,041	\$67,029	\$96,725	\$4,851	\$705	\$3,770	\$229,121
ONONDAGA COUNTY REPUBLICAN COMMITTEE HOUSEKEEPING	\$122,950	\$32,440	\$44,901	\$5,511		\$1,175	\$206,977
NYSCP CONFERENCE ACCOUNT(HOUSEKEEPING)	\$76,000	\$59,770	\$26,724	\$780	\$3,404		\$166,678
INDEPENDENCE PARTY OF NEW YORK STATE - HOUSEKEEPING ACCOUNT	\$502	\$11,675	\$123,271	\$2,150	\$200	\$5,500	\$143,298
TOWN OF ISLIP REPUBLICAN COMMITTEE	\$47,375	\$13,208	\$33,610	\$2,250		\$3,005	\$99,448
SUFFOLK COUNTY REPUBLICAN COMMITTEE- HOUSEKEEPING ACCOUNT			\$94,600				\$94,600

Committee	Businesses	Individuals	Parties & Candidates	Union	Advocacy Groups	Unidentified	Grand Total
ERIE COUNTY DEMOCRATIC COMMITTEE-HOUSEKEEPING	\$31,175	\$28,088	\$17,585	\$16,300			\$93,147
WRCC HOUSEKEEPING	\$19,251	\$57,311	\$3,600	\$5,000			\$85,162
NEW YORK COUNTY DEMOCRATIC COMMITTEE	\$17,791	\$50,105	\$4,575	\$4,000	\$1,250	\$2,000	\$79,721
MONROE COUNTY DEMOCRATIC COMMITTEE	\$49,386	\$30,000					\$79,386
INDEPENDENCE PARTY - OPERATIONS	\$650	\$15,674	\$28,661			\$3,000	\$47,985
YONKERS REPUBLICAN CITY COMMITTEE	\$12,615	\$14,199	\$7,675	\$2,450	\$150	\$1,300	\$38,389
BROOKHAVEN TOWN DEMOCRATIC COMMITTEE	\$5,000	\$25,032					\$30,032
BROOKHAVEN TOWN REPUBLICAN COMMITTEE	\$14,385	\$8,995		\$225		\$1,260	\$24,865
ALBANY COUNTY REPUBLICAN COMMITTEE HOUSE	\$1,200	\$21,046	\$600				\$22,846
ROCKVILLE CENTRE REPUBLICAN CLUB HOUSEKEEPING ACCOUNT	\$14,500		\$1,000	\$5,500			\$21,000
STEBEN COUNTY REPUBLICAN COMMITTEE	\$4,410	\$13,918	\$684	\$100			\$19,112
REPUBLICAN ASSEMBLY CAMP COMMITTEE HOUSEKEEPING CONFERENCE ACCOUNT	\$16,500	\$1,612					\$18,112
INDEPENDENCE PARTY OF MONROE COUNTY		\$17,403	\$500				\$17,903
JEFFERSON COUNTY DEMOCRATIC COMMITTEE		\$15,803					\$15,803
INDEPENDENCE PARTY COMMITTEE OF NIAGARA COUNTY		\$5,000		\$10,400			\$15,400
REPUBLICAN PARTY OF THE TOWN OF EAST FISHKILL	\$98	\$90	\$6,270			\$7,810	\$14,268
NORTH SYOSSET-WOODBURY REPUBLICAN CLUB		\$7,310					\$7,310
NEW YORK STATE RIGHT-TO-LIFE PARTY	\$7,201						\$7,201
WASHINGTON COUNTY DEMOCRATIC COMMITTEE		\$6,441				\$341	\$6,782
REPUBLICANS OF SMITHTOWN			\$5,000				\$5,000
TOMPKINS COUNTY REPUBLICAN COMMITTEE		\$180	\$3,239			\$1,180	\$4,599
WILLIAMSON TOWN REPUBLICAN COMMITTEE		\$3,899	\$90				\$3,989
LACKAWANNA REPUBLICAN COMMITTEE		\$3,503					\$3,503
BROOME COUNTY REPUBLICAN COMMITTEE	\$400	\$1,895	\$650				\$2,945
GREECE DEMOCRATIC COMMITTEE	\$200	\$2,107	\$450				\$2,757
TONAWANDA REPUBLICAN COMMITTEE		\$746				\$1,947	\$2,693
REPUBLICAN 100,000 CLUB OF ONEIDA COUNTY	\$4	\$850			\$10	\$1,651	\$2,515

Committee	Businesses	Individuals	Parties & Candidates	Union	Advocacy Groups	Unidentified	Grand Total
ELMONT SOUTH REPUBLICAN COMMITTEEMEN'S COUNCIL	\$295	\$1,165					\$1,460
TIOGA COUNTY DEMOCRATIC COMMITTEE		\$1,398					\$1,398
TOMPKINS COUNTY GREEN PARTY		\$1,198					\$1,198
ONTARIO COUNTY DEMOCRATIC COMMITTEE		\$1,090					\$1,090
YATES COUNTY REPUBLICAN COMMITTEE		\$525				\$475	\$1,000
CAROLINE DEMOCRATIC COMMITTEE	\$0		\$848			\$25	\$873
AMHERST REPUBLICAN COMMITTEE		\$852					\$852
ORLEANS COUNTY REPUBLICAN COMMITTEE (HOUSEKEEPING) CONSTITUTED COMMITTEE	\$300	\$500					\$800
CHEMUNG COUNTY REPUBLICAN COMMITTEE		\$181	\$399				\$580
ISLIP TOWN DEMOCRATIC COMMITTEE	\$212	\$362					\$575
NASSAU COUNTY REPUBLICAN COMMITTEE	\$1	\$1				\$501	\$502
CORTLAND COUNTY REPUBLICAN COMMITTEE		\$231					\$231
WAYNE COUNTY REPUBLICAN COMMITTEE		\$225					\$225
GENEVA CITY DEMOCRATIC COMMITTEE		\$120					\$120
DEERPARK DEMOCRATIC COMMITTEE		\$81					\$81
SARATOGA COUNTY GREEN PARTY		\$60					\$60
BROOME COUNTY CONSERVATIVE PARTY			\$49				\$49
RYE TOWN REPUBLICAN COMMITTEE		\$20					\$20
LIVINGSTON COUNTY DEMOCRATIC COMMITTEE						\$10	\$10
LANCASTER DEMOCRATIC COMMITTEE		\$0					\$0
Grand Total	\$32,176,987	\$10,435,074	\$4,933,910	\$4,830,818	\$561,022	\$235,285	\$53,173,098

Appendix C: Largest Soft Money Committees by Year

Committee	1998	1999	2000	2001	2002	2003	2004	2005	2006	GrandTotal
NEW YORK REPUBLICAN STATE COMMITTEE - HOUSEKEEPING		\$1,323,463	\$3,310,552	\$2,573,863	\$4,949,552	\$1,751,372	\$1,678,890	\$1,973,506	\$815,200	\$18,376,398
NYS SENATE REPUBLICAN CAMPAIGN COMMITTEE - HOUSEKEEPING				\$797,850	\$1,395,336	\$1,028,360	\$1,813,650	\$1,498,589	\$1,064,600	\$7,598,384
NEW YORK STATE DEMOCRATIC COMMITTEE (HOUSEKEEPING)		\$142,300	\$548,131	\$380,733	\$1,447,950	\$690,780	\$959,595	\$1,147,860	\$1,171,078	\$6,488,426
CONSERVATIVE PARTY OF NYS (HEADQUARTERS ACCOUNT)		\$702,055	\$1,355,641	\$699,381	\$1,034,824	\$707,188	\$538,283	\$686,798	\$299,421	\$6,023,590
DEMOCRATIC ASSEMBLY CAMPAIGN COMMITTEE- HOUSEKEEPING		\$384,251	\$567,280	\$387,250	\$718,975	\$684,700	\$988,050	\$731,050	\$406,014	\$4,867,570
REPUBLICAN ASSEMBLY CAMPAIGN COMMITTEE HOUSEKEEPING ACCOUNT		\$247,482	\$422,689	\$220,532	\$236,105	\$204,610	\$203,247	\$154,520	\$121,411	\$1,810,595
NYS SENATE REPUBLICAN CAMPAIGN COMMITTEE		\$309,150	\$1,346,250							\$1,655,400
DEMOCRATIC SENATE CAMPAIGN COMMITTEE - HOUSEKEEPING		\$79,438	\$259,550	\$52,650	\$132,580	\$127,177	\$173,250	\$204,380	\$72,839	\$1,101,863
LIBERAL PARTY OF NEW YORK STATE		\$195,632	\$137,500	\$289,050	\$440,204			\$1,101	\$1,080	\$1,064,566
DEMOCRATIC ORGANIZATION OF QUEENS COUNTY						\$5,600		\$143,497	\$380,285	\$529,382
WORKING FAMILIES PARTY						\$235,000	\$10,000	\$236,000	\$25,000	\$506,000
KINGS COUNTY DEMOCRATIC COUNTY COMMITTEE						\$10,000		\$195,707	\$185,150	\$390,857
NASSAU COUNTY DEMOCRATIC COMMITTEE HOUSEKEEPING ACCOUNT								\$107,113	\$207,428	\$314,541
DEMOCRATIC ASSEMBLY CAMPAIGN COMM.- HOUSEKEEPING CONFERENCE			\$121,500	\$45,750	\$25,500	\$11,000	\$50,000	\$33,000	\$0	\$286,750
NYS SENATE REPUBLICAN CONFERENCE COMMITTEE (HOUSEKEEPING)			\$105,500	\$40,203	\$28,000	\$26,000	\$60,400	\$10,000	\$15,000	\$285,103
NATIONAL REPUBLICAN SENATORIAL COMMITTEE			\$250,000							\$250,000
CONS PARTY OF NYS (ALBANY ACCOUNT)		\$38,920	\$36,121	\$10,375	\$18,313	\$42,912	\$35,585	\$29,160	\$17,735	\$229,121
ONONDAGA COUNTY REPUBLICAN COMMITTEE HOUSEKEEPING								\$83,736	\$123,241	\$206,977
NYS CP CONFERENCE ACCOUNT(HOUSEKEEPING)	\$1,000	\$2,500	\$38,696	\$21,800	\$25,500	\$31,433	\$26,000	\$10,653	\$9,096	\$166,678
INDEPENDENCE PARTY OF NEW YORK STATE - HOUSEKEEPING ACCOUNT			\$6,130	\$21,075	\$44,975		\$14,471	\$56,646		\$143,298
TOWN OF ISLIP REPUBLICAN COMMITTEE								\$91,583	\$7,865	\$99,448
SUFFOLK COUNTY REPUBLICAN COMMITTEE- HOUSEKEEPING ACCOUNT								\$6,000	\$88,600	\$94,600
ERIE COUNTY DEMOCRATIC COMMITTEE- HOUSEKEEPING								\$2,160	\$90,987	\$93,147
WRCC HOUSEKEEPING								\$41,480	\$43,682	\$85,162
NEW YORK COUNTY DEMOCRATIC COMMITTEE								\$79,721		\$79,721
MONROE COUNTY DEMOCRATIC COMMITTEE								\$13,542	\$65,844	\$79,386

Committee	1998	1999	2000	2001	2002	2003	2004	2005	2006	GrandTotal
INDEPENDENCE PARTY - OPERATIONS		\$46,466	\$1,519							\$47,985
YONKERS REPUBLICAN CITY COMMITTEE								\$3,350	\$35,039	\$38,389
BROOKHAVEN TOWN DEMOCRATIC COMMITTEE									\$30,032	\$30,032
BROOKHAVEN TOWN REPUBLICAN COMMITTEE			\$25						\$24,840	\$24,865
ALBANY COUNTY REPUBLICAN COMMITTEE HOUSE								\$4,925	\$17,921	\$22,846
ROCKVILLE CENTRE REPUBLICAN CLUB HOUSEKEEPING ACCOUNT								\$4,500	\$16,500	\$21,000
STEUBEN COUNTY REPUBLICAN COMMITTEE								\$5,033	\$14,079	\$19,112
REPUBLICAN ASSEMBLY CAMP COMMITTEE HOUSEKEEPING CONFERENCE ACCOUNT			\$9,000	\$500	\$3,000	\$0	\$612	\$5,000	\$0	\$18,112
INDEPENDENCE PARTY OF MONROE COUNTY								\$6,941	\$10,962	\$17,903
JEFFERSON COUNTY DEMOCRATIC COMMITTEE								\$7,135	\$8,668	\$15,803
INDEPENDENCE PARTY COMMITTEE OF NIAGARA COUNTY								\$10,400	\$5,000	\$15,400
REPUBLICAN PARTY OF THE TOWN OF EAST FISHKILL								\$14,178	\$90	\$14,268
NORTH SYOSSET- WOODBURY REPUBLICAN CLUB								\$7,310		\$7,310
NEW YORK STATE RIGHT- TO-LIFE PARTY		\$3,555	\$307	\$1,130	\$1,087	\$768	\$178	\$177		\$7,201
WASHINGTON COUNTY DEMOCRATIC COMMITTEE								\$6,482	\$300	\$6,782
REPUBLICANS OF SMITHTOWN								\$5,000		\$5,000
TOMPKINS COUNTY REPUBLICAN COMMITTEE								\$1,760	\$2,839	\$4,599
WILLIAMSON TOWN REPUBLICAN COMMITTEE									\$3,989	\$3,989
LACKAWANNA REPUBLICAN COMMITTEE								\$1,708	\$1,795	\$3,503
BROOME COUNTY REPUBLICAN COMMITTEE								\$200	\$2,745	\$2,945
GRECE DEMOCRATIC COMMITTEE									\$2,757	\$2,757
TONAWANDA REPUBLICAN COMMITTEE								\$2,693		\$2,693
REPUBLICAN 100,000 CLUB OF ONEIDA COUNTY								\$9	\$2,506	\$2,515
ELMONT SOUTH REPUBLICAN COMMITTEEMEN'S COUNCIL								\$1,460		\$1,460
TIOGA COUNTY DEMOCRATIC COMMITTEE								\$1,398		\$1,398
TOMPKINS COUNTY GREEN PARTY					\$1,198					\$1,198
ONTARIO COUNTY DEMOCRATIC COMMITTEE									\$1,090	\$1,090
YATES COUNTY REPUBLICAN COMMITTEE								\$525	\$475	\$1,000
CAROLINE DEMOCRATIC COMMITTEE								\$0	\$873	\$873
AMHERST REPUBLICAN COMMITTEE								\$198	\$654	\$852
ORLEANS COUNTY REPUBLICAN COMMITTEE (HOUSEKEEPING) CONSTITUTED COMMITTEE									\$800	\$800

Committee	1998	1999	2000	2001	2002	2003	2004	2005	2006	GrandTotal
CHEMUNG COUNTY REPUBLICAN COMMITTEE								\$399	\$181	\$580
ISLIP TOWN DEMOCRATIC COMMITTEE								\$10	\$564	\$575
NASSAU COUNTY REPUBLICAN COMMITTEE								\$0	\$502	\$502
CORTLAND COUNTY REPUBLICAN COMMITTEE									\$231	\$231
WAYNE COUNTY REPUBLICAN COMMITTEE									\$225	\$225
GENEVA CITY DEMOCRATIC COMMITTEE									\$120	\$120
DEERPARK DEMOCRATIC COMMITTEE								\$81		\$81
SARATOGA COUNTY GREEN PARTY						\$60				\$60
BROOME COUNTY CONSERVATIVE PARTY									\$49	\$49
RYE TOWN REPUBLICAN COMMITTEE									\$20	\$20
LIVINGSTON COUNTY DEMOCRATIC COMMITTEE								\$3	\$7	\$10
LANCASTER DEMOCRATIC COMMITTEE									\$0	\$0
Grand Total	\$1,000	\$3,475,212	\$8,516,391	\$5,542,142	\$10,503,098	\$5,556,958	\$6,552,211	\$7,628,677	\$5,397,409	\$53,173,098

Appendix D: Soft Money Contributions Since 1999 By County

Rank	County and State	Republican	Democrat	Minor Parties	Grand Total
1	NEW YORK, NEW YORK	\$10,620,640	\$5,353,075	\$3,043,005	\$19,016,720
2	ALBANY, NEW YORK	\$3,773,983	\$3,196,130	\$315,202	\$7,285,315
3	DISTRICT OF COLUMBIA, DISTRICT OF COLUMBIA	\$1,789,006	\$1,482,233	\$41,600	\$3,312,838
4	WESTCHESTER, NEW YORK	\$1,565,671	\$203,700	\$464,320	\$2,233,691
5	NASSAU, NEW YORK	\$982,762	\$585,789	\$610,211	\$2,178,762
6	KINGS, NEW YORK	\$330,310	\$261,535	\$1,284,467	\$1,876,312
7	QUEENS, NEW YORK	\$290,350	\$530,460	\$310,862	\$1,131,672
	INVALID OR MISSING ZIP CODE	\$440,960	\$119,041	\$265,470	\$825,470
8	MONROE, NEW YORK	\$514,421	\$139,941	\$88,978	\$743,340
9	SUFFOLK, NEW YORK	\$474,868	\$75,944	\$168,891	\$719,703
10	FAIRFIELD, CONNECTICUT	\$366,275	\$147,000	\$112,250	\$625,525
11	ERIE, NEW YORK	\$337,876	\$141,129	\$96,381	\$575,385
12	RENSSELAER, NEW YORK	\$300,235	\$204,275	\$70,851	\$575,361
13	ONONDAGA, NEW YORK	\$457,061	\$23,100	\$61,187	\$541,348
14	CHITTENDEN, VERMONT	\$312,500	\$152,500		\$465,000
15	HILLSBOROUGH, FLORIDA	\$349,250	\$109,000		\$458,250
16	MORRIS, NEW JERSEY	\$291,900	\$75,600	\$38,800	\$406,300
17	HARTFORD, CONNECTICUT	\$352,634	\$40,000	\$1,000	\$393,634
18	HARRIS, TEXAS	\$331,258	\$11,000	\$20,500	\$362,758
19	NEW CASTLE, DELAWARE	\$281,500	\$51,500	\$25,000	\$358,000
20	ESSEX, NEW YORK	\$346,126		\$675	\$346,801
21	HUDSON, NEW JERSEY	\$159,000	\$134,500	\$49,050	\$342,550
22	FAIRFAX, VIRGINIA	\$313,500	\$1,200	\$25,000	\$339,700
23	COOK, ILLINOIS	\$225,500	\$55,500	\$4,164	\$285,164
24	PHILADELPHIA, PENNSYLVANIA	\$219,686	\$51,000	\$5,750	\$276,436
25	SARATOGA, NEW YORK	\$181,693	\$54,767	\$14,758	\$251,219
26	PALM BEACH, FLORIDA	\$235,000	\$11,550	\$300	\$246,850
27	ESSEX, NEW JERSEY	\$182,400	\$60,500	\$3,347	\$246,247
28	BERGEN, NEW JERSEY	\$113,050	\$28,000	\$85,722	\$226,772
29	KENT, RHODE ISLAND	\$157,000	\$41,200	\$250	\$198,450
30	PASSAIC, NEW JERSEY	\$12,000	\$162,000	\$18,000	\$192,000
31	BRONX, NEW YORK	\$70,725	\$46,460	\$70,665	\$187,850
32	RICHMOND, NEW YORK	\$28,100	\$16,300	\$136,920	\$181,320
33	SHELBY, TENNESSEE	\$181,025			\$181,025
34	SCHENECTADY, NEW YORK	\$146,630	\$10,750	\$14,959	\$172,338
35	DURHAM, NORTH CAROLINA	\$79,000	\$68,400		\$147,400
36	CATTARAUGUS, NEW YORK	\$142,600		\$4,293	\$146,893
37	LOS ANGELES, CALIFORNIA	\$117,500	\$15,000	\$4,750	\$137,250
38	FAYETTE, KENTUCKY	\$108,000	\$23,000		\$131,000
39	ROCKLAND, NEW YORK	\$61,050	\$25,350	\$43,155	\$129,555
40	STEUBEN, NEW YORK	\$117,156	\$500	\$3,380	\$121,036
41	CUYAHOGA, OHIO	\$114,350			\$114,350
42	SCHOHARIE, NEW YORK	\$109,575		\$994	\$110,569
43	MARION, INDIANA	\$95,000	\$4,000	\$5,000	\$104,000
44	MIDDLESEX, NEW JERSEY	\$55,000	\$25,500	\$21,349	\$101,849
45	GRANT, INDIANA	\$50,000		\$50,000	\$100,000
46	SULLIVAN, NEW YORK	\$70,000	\$21,000	\$5,881	\$96,881
47	MIAMI-DADE, FLORIDA	\$55,500	\$35,550	\$5,000	\$96,050
48	NEW HAVEN, CONNECTICUT	\$18,400	\$600	\$73,250	\$92,250
49	DAUPHIN, PENNSYLVANIA	\$83,000	\$8,000		\$91,000
50	HENNEPIN, MINNESOTA	\$70,500	\$1,000	\$8,000	\$79,500
51	MONTGOMERY, PENNSYLVANIA	\$43,500	\$35,851		\$79,351
52	ORANGE, NEW YORK	\$58,150	\$250	\$20,546	\$78,946
53	MERCER, NEW JERSEY	\$50,000	\$27,000		\$77,000
54	JEFFERSON, KENTUCKY	\$60,250	\$14,994		\$75,244
55	KALAMAZOO, MICHIGAN	\$65,000	\$9,000	\$25	\$74,025
56	PROVIDENCE, RHODE ISLAND	\$60,500	\$10,000		\$70,500

Rank	County and State	Republican	Democrat	Minor Parties	Grand Total
57	SAINT LOUIS, MISSOURI	\$59,000	\$10,500		\$69,500
58	FAIRFAX CITY, VIRGINIA			\$68,850	\$68,850
59	MADISON, NEW YORK	\$25,700	\$37,500	\$3,204	\$66,404
60	SOMERSET, NEW JERSEY	\$50,000	\$3,000	\$13,354	\$66,354
61	MARICOPA, ARIZONA	\$40,350	\$24,500		\$64,850
62	DALLAS, TEXAS	\$39,000		\$25,000	\$64,000
63	SUFFOLK, MASSACHUSETTS	\$45,500	\$10,000	\$8,500	\$64,000
64	LEE, FLORIDA	\$57,750	\$5,000	\$25	\$62,775
65	CLARK, NEVADA	\$40,000	\$20,000		\$60,000
66	VIRGINIA BEACH CITY, VIRGINIA	\$31,500	\$25,000		\$56,500
67	SACRAMENTO, CALIFORNIA	\$28,000	\$27,000		\$55,000
68	ULSTER, NEW YORK	\$50,050		\$4,630	\$54,680
69	DUTCHESS, NEW YORK	\$29,815	\$600	\$24,182	\$54,597
70	UNION, NEW JERSEY	\$41,000	\$12,900		\$53,900
71	ALEXANDRIA CITY, VIRGINIA	\$15,222	\$5,000	\$33,404	\$53,625
72	BROOME, NEW YORK	\$34,555	\$5,000	\$13,639	\$53,194
73	SUMMIT, OHIO	\$53,000			\$53,000
74	WAYNE, MICHIGAN	\$2,500		\$50,000	\$52,500
75	NIAGARA, NEW YORK	\$28,125	\$75	\$23,656	\$51,856
76	ONEIDA, NEW YORK	\$15,402	\$6,750	\$28,602	\$50,754
77	SANTA CRUZ, CALIFORNIA	\$50,000			\$50,000
78	TARRANT, TEXAS	\$50,000			\$50,000
79	FORSYTH, NORTH CAROLINA	\$38,500	\$5,000	\$5,000	\$48,500
80	MILWAUKEE, WISCONSIN	\$28,500	\$19,000	\$1,000	\$48,500
81	MONTGOMERY, MARYLAND	\$40,325	\$5,150	\$1,815	\$47,290
82	SAINT LAWRENCE, NEW YORK	\$41,700	\$2,500	\$1,737	\$45,937
83	ONTARIO, NEW YORK	\$34,873	\$7,620	\$3,329	\$45,822
84	ALLEGHENY, PENNSYLVANIA	\$31,750	\$12,750	\$1,001	\$45,501
85	ADA, IDAHO	\$45,000			\$45,000
86	WASHOE, NEVADA	\$42,000			\$42,000
87	COLUMBIA, NEW YORK	\$30,132		\$10,823	\$40,955
88	MONTGOMERY, NEW YORK	\$39,500		\$1,270	\$40,770
89	CAYUGA, NEW YORK	\$6,975		\$33,139	\$40,114
90	HAMILTON, OHIO	\$30,000		\$10,000	\$40,000
91	PUTNAM, NEW YORK	\$9,100		\$28,213	\$37,313
92	ARAPAHOE, COLORADO	\$37,000			\$37,000
93	DAVIDSON, TENNESSEE	\$30,000		\$6,500	\$36,500
94	DELAWARE, PENNSYLVANIA	\$36,500			\$36,500
95	ORANGE, CALIFORNIA	\$23,500	\$12,000	\$300	\$35,800
96	OTSEGO, NEW YORK	\$30,100		\$5,659	\$35,759
97	NORFOLK CITY, VIRGINIA	\$33,000	\$2,500		\$35,500
98	SAN DIEGO, CALIFORNIA	\$29,500	\$6,000		\$35,500
99	DUVAL, FLORIDA	\$15,000	\$20,000		\$35,000
100	KING, WASHINGTON	\$32,500	\$1,000		\$33,500
101	LEHIGH, PENNSYLVANIA	\$31,000			\$31,000
102	NORFOLK, MASSACHUSETTS	\$30,500			\$30,500
103	LUZERNE, PENNSYLVANIA	\$24,000		\$4,500	\$28,500
104	WARREN, NEW YORK	\$23,400	\$1,000	\$3,835	\$28,235
105	MONMOUTH, NEW JERSEY	\$13,400	\$1,300	\$13,250	\$27,950
106	ORANGE, FLORIDA	\$27,780	\$158		\$27,938
107	BROWARD, FLORIDA	\$7,130	\$20,000		\$27,130
108	TOMPKINS, NEW YORK	\$16,719	\$8,848	\$880	\$26,446
109	CHARLESTON, SOUTH CAROLINA	\$25,000			\$25,000
110	GUILFORD, NORTH CAROLINA	\$25,000			\$25,000
111	SEDGWICK, KANSAS	\$23,500			\$23,500
112	GENESEE, NEW YORK	\$19,750		\$2,233	\$21,983
113	MIDDLESEX, MASSACHUSETTS	\$5,690	\$15,500		\$21,190
114	CHEMUNG, NEW YORK	\$18,845		\$1,560	\$20,405
115	FRANKLIN, NEW YORK	\$20,000		\$52	\$20,052
116	OAKLAND, MICHIGAN	\$20,000			\$20,000
117	ROCKDALE, GEORGIA	\$20,000			\$20,000
118	SALT LAKE, UTAH	\$5,000	\$14,025		\$19,025

Rank	County and State	Republican	Democrat	Minor Parties	Grand Total
119	SAN MATEO, CALIFORNIA	\$13,400	\$5,080	\$541	\$19,021
120	COLLIN, TEXAS	\$19,000			\$19,000
121	FRANKLIN, OHIO	\$12,500	\$6,482		\$18,982
122	EL PASO, COLORADO	\$9,000	\$8,500		\$17,500
123	LAKE, ILLINOIS	\$9,500	\$7,500		\$17,000
124	ORLEANS, LOUISIANA	\$11,000	\$6,000		\$17,000
125	SENECA, NEW YORK	\$7,775		\$8,883	\$16,658
126	SAINT LOUIS CITY, MISSOURI	\$14,500	\$1,500		\$16,000
127	CORTLAND, NEW YORK	\$14,800		\$766	\$15,566
128	WAYNE, NEW YORK	\$5,414		\$9,883	\$15,297
129	BUCKS, PENNSYLVANIA	\$15,000			\$15,000
130	GALLATIN, MONTANA	\$15,000			\$15,000
131	OZAUKEE, WISCONSIN	\$5,000	\$10,000		\$15,000
132	DELAWARE, NEW YORK	\$13,500		\$353	\$13,853
133	CUMBERLAND, PENNSYLVANIA	\$13,500			\$13,500
134	OKLAHOMA, OKLAHOMA	\$5,000	\$1,000	\$7,196	\$13,196
135	RAMSEY, MINNESOTA	\$12,500		\$227	\$12,727
136	SANTA CLARA, CALIFORNIA	\$12,500			\$12,500
137	JEFFERSON, NEW YORK	\$400	\$1,090	\$10,903	\$12,393
138	JOHNSON, KANSAS	\$12,000			\$12,000
139	CHESTER, PENNSYLVANIA	\$10,750	\$1,000		\$11,750
140	BALTIMORE CITY, MARYLAND	\$11,500			\$11,500
141	SAN FRANCISCO, CALIFORNIA	\$11,400			\$11,400
142	STRAFFORD, NEW HAMPSHIRE	\$11,000			\$11,000
143	GREENE, NEW YORK	\$6,325		\$3,854	\$10,179
144	BELL, TEXAS	\$6,000	\$4,000		\$10,000
145	DOUGLAS, NEBRASKA	\$10,000			\$10,000
146	HARRISON, WEST VIRGINIA	\$10,000			\$10,000
147	HUNTERDON, NEW JERSEY			\$10,000	\$10,000
148	MUSCOGEE, GEORGIA	\$10,000			\$10,000
149	RIVERSIDE, CALIFORNIA	\$5,000	\$5,000		\$10,000
150	CLINTON, NEW YORK	\$2,259		\$7,484	\$9,743
151	FULTON, NEW YORK	\$5,300		\$3,590	\$8,890
152	TULSA, OKLAHOMA	\$7,444			\$7,444
153	SUSSEX, NEW JERSEY	\$6,151		\$885	\$7,036
154	ORLEANS, NEW YORK	\$6,050		\$249	\$6,299
155	WASHINGTON, NEW YORK	\$5,000		\$781	\$5,781
156	ALAMEDA, CALIFORNIA	\$5,000			\$5,000
157	BALTIMORE, MARYLAND	\$5,000			\$5,000
158	BERKS, PENNSYLVANIA	\$5,000			\$5,000
159	BRUNSWICK, NORTH CAROLINA		\$5,000		\$5,000
160	CAMDEN, NEW JERSEY	\$5,000			\$5,000
161	EL PASO, TEXAS	\$5,000			\$5,000
162	FORSYTH, GEORGIA			\$5,000	\$5,000
163	HAMILTON, TENNESSEE	\$5,000			\$5,000
164	HILLSBOROUGH, NEW HAMPSHIRE	\$5,000			\$5,000
165	JEFFERSON, TEXAS	\$5,000			\$5,000
166	LANCASTER, NEBRASKA		\$5,000		\$5,000
167	PENNINGTON, SOUTH DAKOTA	\$5,000			\$5,000
168	TRAVIS, TEXAS	\$5,000			\$5,000
169	YOLO, CALIFORNIA	\$5,000			\$5,000
170	CHESHIRE, NEW HAMPSHIRE	\$4,500			\$4,500
171	ANNE ARUNDEL, MARYLAND			\$4,000	\$4,000
172	MONTGOMERY, TENNESSEE	\$4,000			\$4,000
173	DEKALB, GEORGIA	\$3,800			\$3,800
174	JACKSON, MISSOURI	\$3,500		\$100	\$3,600
175	LITCHFIELD, CONNECTICUT	\$3,500	\$75		\$3,575
176	WINNEBAGO, ILLINOIS		\$3,500		\$3,500
177	RICHMOND CITY, VIRGINIA	\$2,750		\$404	\$3,154
178	BEXAR, TEXAS	\$1,500	\$1,500	\$25	\$3,025
179	ESSEX, MASSACHUSETTS	\$3,005			\$3,005
180	FULTON, GEORGIA	\$1,000		\$2,000	\$3,000

Rank	County and State	Republican	Democrat	Minor Parties	Grand Total
181	JEFFERSON, COLORADO	\$3,000			\$3,000
182	KENT, MICHIGAN			\$2,500	\$2,500
183	LYNCHBURG CITY, VIRGINIA	\$2,500			\$2,500
184	ROCKINGHAM, NEW HAMPSHIRE			\$2,500	\$2,500
185	WINNEBAGO, WISCONSIN		\$2,500		\$2,500
186	LIVINGSTON, NEW YORK	\$1,350		\$1,125	\$2,475
187	HERKIMER, NEW YORK	\$700		\$1,641	\$2,341
188	ERIE, PENNSYLVANIA	\$2,000			\$2,000
189	LEON, FLORIDA	\$2,000			\$2,000
190	SONOMA, CALIFORNIA			\$2,000	\$2,000
191	BURLINGTON, NEW JERSEY			\$1,800	\$1,800
192	COLES, ILLINOIS	\$1,500			\$1,500
193	LEWIS, NEW YORK	\$1,125		\$260	\$1,385
194	OSWEGO, NEW YORK			\$1,306	\$1,306
195	YORK, PENNSYLVANIA			\$1,044	\$1,044
196	ANDERSON, TENNESSEE	\$1,000			\$1,000
197	ARLINGTON, VIRGINIA		\$1,000		\$1,000
198	BERKSHIRE, MASSACHUSETTS	\$1,000			\$1,000
199	DUPAGE, ILLINOIS	\$1,000			\$1,000
200	LEBANON, PENNSYLVANIA	\$1,000			\$1,000
201	SARASOTA, FLORIDA	\$1,000			\$1,000
202	WAKE, NORTH CAROLINA	\$1,000			\$1,000
203	WARREN, NEW JERSEY	\$1,000			\$1,000
204	CHENANGO, NEW YORK	\$425		\$565	\$990
205	ALLEGANY, NEW YORK	\$200	\$75	\$609	\$884
206	CHAUTAUQUA, NEW YORK	\$450	\$175	\$245	\$870
207	WYOMING, NEW YORK	\$500	\$7	\$205	\$712
208	MONROE, PENNSYLVANIA		\$600		\$600
209	FAUQUIER, VIRGINIA			\$500	\$500
210	FRANKLIN, VERMONT			\$500	\$500
211	HAMILTON, INDIANA		\$500		\$500
212	RICHLAND, SOUTH CAROLINA	\$500			\$500
213	TIOGA, NEW YORK		\$178	\$203	\$381
214	BIBB, GEORGIA			\$300	\$300
215	CLAY, MISSOURI			\$250	\$250
216	DENVER, COLORADO	\$250			\$250
217	KANAWHA, WEST VIRGINIA			\$250	\$250
218	NEW LONDON, CONNECTICUT	\$250			\$250
219	YATES, NEW YORK	\$99		\$145	\$244
220	SPOTSYLVANIA, VIRGINIA			\$195	\$195
221	PLYMOUTH, MASSACHUSETTS	\$150			\$150
222	STANISLAUS, CALIFORNIA			\$150	\$150
223	PITT, NORTH CAROLINA			\$100	\$100
224	SCHUYLER, NEW YORK			\$78	\$78
225	MACOMB, MICHIGAN			\$50	\$50
226	MONTGOMERY, KANSAS			\$50	\$50
227	HAMILTON, NEW YORK			\$25	\$25
228	NEWPORT NEWS CITY, VIRGINIA			\$10	\$10
229	UPSHUR, WEST VIRGINIA			\$10	\$10
230	CAROLINE, MARYLAND			\$5	\$5
231	PRINCE GEORGES, MARYLAND			\$5	\$5
232	WORCESTER, MASSACHUSETTS		\$5		\$5
	Grand Total	\$30,699,584	\$14,326,115	\$8,223,049	\$53,248,748

Appendix E: Purpose Code Definition Examples²⁷

Hard Money Purpose Codes

CMAIL: Campaign Mailings - cost to produce mailing envelopes, typing, printing, design
CONSL: Consultant Services - consultant's fees, subcontracts
CONSV: Constituent Services - district office renovations, supplies, telephones²⁸
CNTRB: Political Contributions
FUNDR: Fundraising - meals, entertainment, hall rental, tickets²⁹
LITER: Campaign Literature - palm cards, flyers, brochures, lawn signs, letters, billboards, voter lists, printing, circulation costs
OFFCE: Office Expenses - utilities, telephone, equipment, supplies, cleaning
OTHER: Other - (must provide explanation, i.e., campaign van rental, campaign travel, tuxedo rental, reimbursements)
PETIT: Petition Expenses - voter lists, printing, circulation costs,
INT: Interest Expense - loan interest, late payment charges
POLLS: Polling Costs - pollster fee, telephones, voter lists
POSTA: Postage - includes all mailing and delivery service production and placement expense paid
PRINT: Print Ads - directly by the candidate
RADIO: Radio Ads
TV ADS: Television Ads
PROFL: Professional Services - accounting fees, legal fees, speech writing
RENTO: Office Rent
VOTER: Voter Registration Materials - maps, printing, mailing costs or services
WAGES: Campaign Workers' Salaries

Soft Money Purpose Codes

UTILS: Utilities
PAYRL: Payroll
POSTA: Postage
PROFL: Professional Services
OFEXP: Office Expenses
MAILS: Mailings
OTHER: Other: Provide Explanation
VOTER: Voter Registration Materials or Services

²⁷ NYS Board of Elections, *Handbook of Instructions for Campaign Financial Disclosure*, 2006.

²⁸ CONSV can be used only by a political office holder to better serve his or her constituents or better serve his or her office.

²⁹ Expenses to conduct a fund raiser are fund raising expenses (FUNDR). Purchasing tickets to another candidate's fund raiser is a political contribution and should be coded as a political contribution (CNTRB).