



New York State Board of Elections Annual Report 2024

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Mission Statement

The New York State Board of Elections (NYSBOE) was established in the Executive Department, June 1, 1974, as a bipartisan agency vested with the responsibility for administration and enforcement of all laws relating to elections in New York State. The Board is also responsible for regulating campaign finance disclosures and limitations and a Fair Campaign Code intended to govern campaign practices. In conducting these wide-ranging responsibilities, the Board offers assistance to local election boards and investigates complaints of possible statutory violations. In addition to the regulatory and enforcement responsibilities, the Board is charged with the preservation of citizen confidence in the democratic process and enhancing voter participation in elections.

Commissioners

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Co-Chair, Commissioner

Peter S. Kosinski
Co-Chair, Commissioner

Essma Bagnuola
Commissioner

Anthony J. Casale
Commissioner

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Vacant
Counsel

Vacant
Deputy Counsel

Kevin Murphy
Deputy Counsel

Laura Baker
Chief Information Officer

Michael Johnson
Chief Enforcement Counsel

COUNSELS' OFFICE

The attorneys in this office are responsible for handling all legal matters impacting the New York State Board of Elections ("NYSBOE"), including litigation in both state and federal courts by or against NYSBOE. The office also drafts regulations, formal and advisory opinions, and an annual Election Law Update on developments in election case law and statutes. The attorneys work with all other agency units to prepare NYSBOE's legislative agenda and draft legislation for the commissioners to present to the Legislature. Counsels' Office provides oversight and guidance on contracts, compiles responses to subpoenas and certain Freedom of Information Law requests, and prepares and presents continuing legal education courses on campaign finance laws throughout the state. Counsels' Office also responds to a large volume of legal questions from county boards, candidates, constituents, committees, and NYSBOE's Public Information Office regarding all aspects of the Election Law.

Litigation

In addition to the numerous ballot access cases Counsels' Office managed and resolved, the Office was engaged in the following significant litigation:

Upstate Jobs Party et al. v. Kosinski et al. (NDNY; Second Circuit Court of Appeals): In this action, Plaintiffs sought to enjoin NYSBOE from enforcing certain campaign finance laws restricting campaign contributions to and from "Independent Bodies" in ways that do not apply to political "Parties." Specifically, Plaintiffs challenged: (1) N.Y. Elec. Law § 14-114(1) and 9 NYCRR § 6214.0, which prohibit individual contributions to Independent Bodies greater than \$44,000 as well as Plaintiff's contributions to its own gubernatorial candidate greater than \$44,000, but which allow individual contributions to Parties up to \$109,600 and Party contributions to their own candidates in unlimited amounts; and (2) N.Y. Elec. Law § 14-124(3), which permits Parties, but not Independent Bodies, to establish "Housekeeping Accounts" for which Parties may raise funds in any amount for "ordinary activities . . . not for the express purpose of promoting the candidacy of specific candidates." After discovery, both parties moved for summary judgment. The trial court granted Plaintiff's summary judgment motion regarding contribution limits in general elections and granted NYSBOE's summary judgment motion regarding contribution limits in primary elections and housekeeping accounts. NYSBOE filed an appeal with the Second Circuit and oral argument was held. The Second Circuit reversed the judgment in Plaintiff's favor relating to contribution limits and affirmed the judgment in NYSBOE's favor relating to housekeeping accounts.

Brooklyn NAACP v. Kosinski et al. (SDNY): Plaintiffs challenged the constitutionality of Section 17-140 of the Election Law, prohibiting providing meat, drink, tobacco, refreshment, or provisions to persons in a polling place, as violative of the First Amendment. NYSBOE filed a motion to dismiss in April 2022 which was denied. NYSBOE

and the Plaintiffs engaged in discovery and depositions were taken. A trial was held in early 2024 in which NYSBOE's staff testified. The court found Election Law Section 17-140 unconstitutional and granted an injunction against its enforcement. An appeal of the trial court's decision was not taken. The provision at issue has since been repealed (Chap. 156 of 2025).

Fossella et al. v. Adams et al. (Sup. Ct., Richmond Co.; 2nd Dept. Appellate Div.; NYS Court of Appeals): Plaintiffs challenged a New York City local law that authorized non-citizens to vote in certain New York City elections. New York City filed a motion to join NYSBOE in the matter as a necessary party, which was granted. Both Plaintiffs and Defendants filed for summary judgment. Plaintiff's motion was granted, including a permanent injunction, and Defendants motion for summary judgment was denied. An appeal was taken to the Second Department. The Court ruled the law authorizing non-citizens to vote in certain New York City elections was null and void because it was in violation of the New York State Constitution and Municipal Home Rule Law. An appeal was made to the NYS Court of Appeals. At the close of 2024 the case was still pending.

Schmidt et al. v. Kosinski et al. (EDNY): Plaintiffs filed suit challenging the constitutionality of the provisions of the Election Law that prevented out-of-state individuals from witnessing Independent Nominating Petitions. The Court granted Plaintiffs' motion for a Preliminary Injunction and prohibited NYSBOE from enforcing "Election Law §6-140(1)(b) to the extent that it would prevent a United States citizen who otherwise satisfies the requirements to register to vote in New York, but who is not so registered, or a United States citizen who would satisfy those requirements if the citizen was a New York resident, from validly witnessing signatures on Nominating Petitions, when that individual complies with certain procedures." In 2024, the Court granted Plaintiffs' motion for summary judgment and has since issued a permanent injunction against enforcement of Election Law section 6-140(1)(b).

Amedure et al. v. State of New York et al. (Sup. Ct., Saratoga Co.; 3rd Dept. Appellate Div.; NYS Court of Appeals): Plaintiffs challenged the constitutionality of Election Law Section 9-209 (Chap. 763 of 2021), which provided a new process for the canvass of absentee, military, special, and affidavit ballots. The Supreme Court ruled Election Law Section 9-209(2)(g) unconstitutional, which had directed the Central Board of Canvassers to cast and canvass a ballot if the Board splits on whether said ballot is valid. The remaining portions of Section 9-209 were upheld. An appeal was taken to the 3rd Department of the Appellate Division, which overruled the trial court's decision and held that Section 9-209 was constitutional in its entirety. An appeal to the Court of Appeals was taken. The Court of Appeals upheld the Third Department's decision and declared all of Section 9-209 constitutional.

Frentzel et al. v. Mohr et al. (WDNY; Second Circuit Court of Appeals): Plaintiffs filed suit alleging the unconstitutionality of Election Law § 8-308(4), which provides that a write-in vote for a party primary for a candidate not enrolled in the party is void. The Court

declined to issue an injunction against application of Election Law § 8-308 (4). An expedited motion to appeal was filed and denied by the Second Circuit Court of Appeals and in early 2024, the Second Circuit dismissed the appeal. The case continues to proceed on the underlying merits.

Stefanik et al. v. Hochul et al. (Sup. Ct., Albany Co.; 3rd Dept. Appellate Div.; NYS Court of Appeals): Plaintiffs filed suit alleging that the New York Early Mail Voter Act (Chap. 481 of 2023) was unconstitutional on the grounds that it violated Article II, § 2 of the New York State Constitution and sought a preliminary injunction. The injunction was denied on the grounds that the Plaintiffs failed to prove that they suffered irreparable harm and that the balance of the equities were in their favor. The denial of the injunction was appealed to the Appellate Division which upheld the denial. On the underlying merits, the Supreme Court ruled that Early Vote by Mail was constitutional and dismissed the suit. An appeal was taken, and the Third Department upheld the statute. An appeal was made to the NYS Court of Appeals, which likewise upheld the Early Vote by Mail statute.

Fernandez et al. v. NYSBOE et al. (Sup. Ct., Albany Co.): Plaintiffs filed a CPLR Article 78 proceeding challenging the ballot question language approved and promulgated by NYSBOE for the “Equal Rights Amendment” to the NY Constitution. The Court found that NYSBOE violated Election Law § 4-108 because the adopted language did not sufficiently describe the change in policy to be adopted but instead described the legal mechanism of the change. The Court ruled that the appropriate remedy was to compel NYSBOE to use language crafted by the court that was legally compliant.

HAVA Administrative Complaints

Section 402 of the Help America Vote Act of 2002 (“HAVA”) requires the State to create a state-based administrative complaint procedure for voters to lodge complaints concerning the voting process. Specifically, HAVA provides that any state receiving HAVA funds shall establish a procedure where “...any person who believes that there is a violation of any provision of title III (including a violation which has occurred, is occurring, or is about to occur) may file a complaint.” Section 3-105 of the New York State Election Law outlines the complaint procedure. A formal complaint shall be in writing, signed and notarized; the evidentiary standard shall be a preponderance of the evidence; the final determination shall be published; and appropriate action shall be taken by the State Board of Elections as necessary. Additionally, 9 NYCRR § 6216.2 further outlines the administrative complaint process.

In 2024, the State Board issued two HAVA determinations:

In *Tucci v. Suffolk County Board of Elections*, the Suffolk County Board was directed to instruct poll workers on the proper procedures if a Ballot Marking Device (“BMD”) malfunctions and there is another BMD available for use. The Board was also directed to instruct poll workers on proper procedures relating to use of BMDs as both a Ballot

Marking Device and as a scanner.

In *Demick v. New York City Board of Elections*, the NYC Board was directed to emphasize during poll worker training the proper procedure to follow when a Ballot Marking Device (“BMD”) is non-operational. Furthermore, the Board was directed to also emphasize that all voters, including those using the BMD, must be able to vote independently and privately if they so choose and the proper procedure to assist a voter with their ballot. Emphasizing that the privacy of the ballot attaches to every step of the process, including post-ballot-marking handling of the ballot and any inspection of the ballot revealing the voter’s vote selections to discern why it is not scanning, is improper.

Regulations and Directives

The Office drafted and the Board adopted the following regulations:

1. Amendments to Part 6211.1 (a) related to designation of early voting sites.
2. Addition of new Part 6223 related to Automatic Voter Registration.

Board Opinions

The Office of Counsel is responsible for preparing responses to requests for opinions from the NYSBOE. These opinions serve to further clarify certain sections of the Election Law. In 2024, no opinions were requested and NYSBOE did not issue any opinions.

Legislative Activities

Counsels’ Office, in consultation with the executive staff, regularly monitors all legislative action which could impact the Board and the election process in New York. Such activities include attending legislative committee meetings, responding to inquiries regarding legislation, and responding to requests for comments on legislation. In addition, Counsels’ Office is responsible for drafting all legislative proposals of the Board. In addition to any New York State legislative initiatives, the office has worked extensively with other members of the staff in reviewing any federal legislative proposals that may influence elections in New York. Below is a summary of major election-related legislation enacted in 2024:

Chapter 91

Provides that a proceeding challenging apportionment by the legislature shall be brought in certain designated courts.

Chapter 92

Created new congressional districts.

Chapter 93

Provides the dates to file a designating petition for Congress and party positions in 2024 and provides the dates when petition signature collection may begin for certain offices.

Chapter 55, Part F

Enacted the "New York State Judicial Security Act."

Chapter 56, Part LL

Enacted the "Doctor John L. Flateau Voting and Elections Database of New York Act."

Chapter 58, Part MM, Subpart BB

Enacted the "Artificial Intelligence Deceptive Practices Act."

Chapter 169

Makes technical changes to the "Artificial Intelligence Deceptive Practices Act" to better conform with federal law.

Chapter 204

Increases the number of judges for certain courts.

Chapter 214

Allows an individual pre-registered to vote to apply for an absentee or early vote by mail ballot if such individual will be 18 years old by election day.

Chapter 215

Amends provisions related to the Electoral College to conform to Federal Electoral Count Reform Act.

Chapter 216

Makes amendments to the John R. Lewis Voting Rights Act of New York regarding definition of certain terms and enforcement provisions, authorizes the Civil Rights Bureau ("CRB") of the Office of the Attorney General to promulgate rules, clarifies certain formulas, and institutes notice requirements to CRB relating to administration of the Act, including litigation.

Chapter 217

Changes the order in which candidates appear on the ballot.

Chapter 218

Provides that an attorney licensed to practice and living in New York may serve as a poll watcher.

Chapter 219

Provides how and when a village conducts a referendum in villages with November elections.

Chapter 220

Provides that a postage paid envelope must be provided with a cure affirmation, that a cure affirmation can be returned in person, by mail, or by email and provides for when a cure must be received.

Chapter 401

Clarifies procedures affecting the first annual election of fire district officials to a board of commissioners.

Chapter 500

Allows local Boards of Election to establish absentee ballot drop-off locations.

Chapter 571

Authorizes school districts to hold elections in any building owned or leased by the district, in addition to any district schoolhouse.

Chapter 639

Prohibits conflicts of interest among Board of Elections employees; prevents a Board employee from remaining on the Board's payroll while also a candidate for an office who has an election overseen by the Board at which they are employed; allows for a member to remain employed at the Board until 90 days before the general election if there is no primary for such office.

Chapter 655

Provides that the New York City Board of Elections shall provide notice to each candidate designated in a petition for election to a party position of a county committee located within the city of New York.

COMPLIANCE UNIT

The Compliance Unit functions under the supervision of Counsels' Office and includes a Training Group sub-unit. The Unit's daily operations are managed by two Compliance Specialists.

The Compliance Unit is responsible for registering new committees and candidates, processing resignation and termination requests, handling amended registration documents, reviewing campaign financial disclosure reports, and operating the Campaign Finance Call Center. The Call Center addresses inquiries about Election Law, filing mandates, and navigating our Electronic Filing System (EFS) Web Application, all with a focus on customer service excellence.

As of December 31, 2024, there were 8,663 active filers with the New York State Board of Elections (NYSBOE). Since the launch of our updated internal system, FIDAS, in 2021, the Compliance Unit has undertaken extensive data cleanup, resulting in a decrease in active filers. A total of 1,049 Candidate and Committee records, deemed dormant, have been terminated since 2021.

Historically, only state candidate records were terminated post-election. With NYSBOE now overseeing local candidate records as well, we have begun terminating local candidate records post-election. In 2024, we terminated a total of 5,924 candidate records from the 2022 and 2023 elections.

TYPE	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
STATE	2,365	3,017	2,996	2,860	2,975	3,120	3,374	3,557	3,296	3,334	2,801
COUNTY	13,534	13,270	13,437	13,602	13,573	14,838	13,921	14,382	7,055	8,505	5,862
TOTAL	15,899	16,287	16,433	16,462	16,548	17,958	17,295	17,939	10,351	11,839	8,663

Filers consist of both committees and candidates without committees who handle their own filings. In 2024, 1,751 new candidates and 473 new committees registered with NYSBOE. For each new registration, the Compliance Unit sends a confirmation to the treasurer or candidate, including the committee/candidate identification and login information for the Electronic Filing System (EFS) Web Application. In total, 8,371 committee and candidate terminations and 307 treasurer resignations were processed. For each instance, the Auditor provided correspondence to the treasurer or candidate.

The Compliance Unit monitors the most common deficiencies in filed financial reports and updates its training materials to address these errors. The compliance review process

serves as an educational resource for treasurers and their candidates, with staff available to answer questions and conduct outreach when necessary. The Frequently Asked Questions section of NYSBOE's Campaign Finance webpage is continuously updated to include answers to additional questions and common compliance issues. Our training seminars and webinars are also updated to reflect these changes. The Unit's goal is that these ongoing efforts will help more treasurers file correctly from the outset.

In 2024, NYSBOE received a total of 44,024 reports, including itemized reports, no-activity reports, in-lieu-of statements, and notices of non-participation. This total comprises 25,531 itemized financial disclosure statements (including amendments). Of these, the Compliance Unit staff reviewed 21,911 itemized filings in 2024. Among these reviewed filings, 2,009 were found to be deficient, 15,322 were compliant, and 3,572 contained training issues.

Since its establishment in 2014, the Compliance Unit has completed over 236,000 compliance reviews. All filings are available for public viewing on the NYSBOE website.

During 2024, the Compliance Unit continued implementation of state law which removed the \$1,000 reporting threshold, thereby requiring all local filers to file exclusively with the NYSBOE. This implementation includes ongoing collaboration with the Information Technology Unit (ITU) to manage our proprietary "Match" software module to process county ballot data and match with existing candidate information. To this end, the Unit worked with the Commissioners of all 62 counties to collect ballot information for the 2024 Primary and General Elections. The Unit used the "Match" software to identify and load 156 Primary Election Candidates and 1,216 General Election Candidates into our CAPAS system resulting in correspondence being sent to all candidates that did not have a corresponding record (649) in FIDAS. This was an increase of 722 Candidates loaded into our system.

In 2024, the Compliance Unit received and processed 778 Candidate Claim of Exemption forms (CF-05). The Unit continues to collaborate closely with ITU and Election Operations to streamline the process and update the office names used in New York State, creating a standardized list for all counties. Additionally, the Compliance Unit is working with ITU to enhance NYSBOE's suite of applications—including EFS, CAPAS, FIDAS, Case Management, and Public Reporting—and to develop business rules for a new NYSBOE software system. These sessions focus on modernizing our internal documents and procedures. The Compliance Unit is also working with MTX to develop our internal and external applications, including our Public Reporting system.

Training Group Sub-Unit

The Training Group sub-unit is comprised of two Training Specialists and four additional staff trainers who mainly support the Public Campaign Finance Unit. The sub-unit's primary focus is on preparing and distributing information and training materials related to the financial disclosure mandates of Article 14 of New York Election Law.

Due to the COVID-19 pandemic, the Training Group transitioned to a virtual webinar model in 2020 to continue training treasurers, candidates, and the public despite travel restrictions and health concerns. This model continued throughout 2024.

In 2024, staff conducted 60 live webinars, providing information and updates on campaign finance. Current training topics include:

- Traditional campaign finance seminars focused on campaign finance registration, disclosure, and rule updates
- Using the EFS Web Application
- Continuing Legal Education (CLE) credits for attorneys
- Continuing Professional Education (CPE) credits for accountants
- "Winding Down the Campaign" training for post-election filers requesting resignation or termination
- A brief introduction to the Public Campaign Finance Board (PCFB)
- Candidate and treasurer-specific training sessions related to the Public Campaign Finance Program

In 2024, there were:

- 12 live webinars with 771 registered attendees for the Campaign Finance Update, with 58 attorneys receiving CLE credits and 61 accountants receiving CPE credits
- 5 live webinars with 412 registered attendees for the EFS Web Application training
- 3 live webinars with 270 registered attendees for "Winding Down the Campaign" training
- 5 live webinars with 292 registered attendees for Introduction to PCFB training
- 35 live webinars with 1,080 registered attendees for the treasurer and candidate-specific trainings for the Public Campaign Finance Program

Approximately 2,900 people registered for virtual webinars in 2024.

Additionally, the Training Group continued a training program to onboard new staff in the Compliance Unit and the Public Campaign Finance Unit. In 2024, they also focused on updating materials, including the Handbook and website, to reflect recent law changes and ensure that website documents were fully accessible and secured.

Referrals to Division of Election Law Enforcement (DELE)

In 2024, the Compliance Unit referred 549 filers to DELE for failing to remedy deficiencies after receiving an initial notice. For itemized reports filed between 2014 and October 2024, a total of 4,727 deficient filings were referred to DELE. Among these, 832 reports were amended to successfully address the deficiencies, eight filings were deleted, 1,360 were reclassified as training, and 2,527 filings remain deficient as of December 31, 2024.

The Board of Elections provides a civil enforcement administrative hearing process through which violations of the election law deemed not criminal may be addressed, followed by civil proceedings in court. The Board has appointed a total of four hearing officer positions to manage these proceedings. In 2024, nine matters were referred by the Division of Election Law Enforcement to a hearing officer.

Additionally, the Enforcement Counsel tendered no subpoena requests in 2024 and requested one criminal referral to prosecutorial agencies.

VOTER REGISTRATION UNIT

Agency-Based Voter Registration

Since 1995, the New York State Board of Elections has been assisting and guiding participating state agencies in understanding and executing their voter registration responsibilities as mandated by the National Voter Registration Act of 1993 (NVRA) and its corresponding state laws. The intent of the program is to offer individuals the opportunity to register to vote, when they apply for or renew a driver's license, or when they apply for services at any of the approximately 800 offices that participate in the program.

Agencies designated to provide voter registration include the Department of Motor Vehicles, as well as public assistance, disability, and other state-designated agencies. Designated as state agencies which provide public assistance are the Office of Temporary and Disability Assistance and the Department of Health. Designated as state agencies that provide programs primarily engaged in providing services to people with disabilities are the Department of Labor, Office for the Aging, Division of Veterans' Affairs, Office of Mental Health, Office of Vocational and Educational Services for Individuals with Disabilities, Commission on Quality of Care and Advocacy for Persons with Disabilities, Office for People With Developmental Disabilities, Commission for the Blind and Visually Handicapped, Office of Alcoholism and Substance Abuse Services, State University of New York Disability Offices, City University of New York Disability Offices, and certain offices which administer programs established or funded by such agencies. Additional state agencies designated as voter registration sites are the Department of State and the Division of Workers' Compensation.

Registration Statistics

During 2024, there were 493,292 voter registration applications or transactions received by County Boards of Elections which resulted from the efforts of state agencies. The Department of Motor Vehicles yielded the highest volume of registration applications among the various agencies mandated by the NVRA, accounting for 94% (464,863) of the total number of voter registration applications or transactions in the state. The remaining agencies participating in the program accounted for 6% (28,429) of registrations.

Sources of Voter Registration

Motor Vehicles	464,863
Public Assistance Agencies	25,213
Disability Agencies	1620
State Designated Agencies	2406
By Mail	148

Total

493,292

Agency-Based Voter Registration Statistics

<u>Year</u>	<u>New Registrations</u>	<u>Address Changes</u>	<u>Enrollment Changes</u>	<u>Name Changes</u>
2014	127,726	56,966	17,126	8,126
2015	132,230	63,883	20,596	8,653
2016	246,762	99,701	50,214	12,511
2017	144,730	88,644	36,200	11,502
2018	257,977	176,530	81,395	17,380
2019	300,458	197,570	100,823	23,897
2020	296,335	112,766	92,985	18,945
2021	160,955	81,589	49,570	10,444
2022	165,136	80,511	32,975	12,392
2023	153,469	73,143	29,045	11,299
2024	180,907	78,859	33,189	17,388

Voter Registration Cancellations

When New York State residents relocate to another state, or when out-of-state residents move into New York State and subsequently register to vote, a notice of registration cancellation is returned either to a county board of elections or the New York State Board of Elections so that voter registration rolls may be updated. In 2024, staff at the State Board of Elections processed 11,465 New York State and 6,501 out-of-state registration cancellations and forwarded them to the appropriate County Board of Elections or state election official.

NYSVoter County Reviews

In 2007, the State Board of Elections implemented “NYSVoter” (pronounced “nice voter”), the statewide voter registration database, to comply with the Help America Vote Act and subsequent amendments to New York Election Law. NYSVoter was built by integrating a centralized database system with the county voter registration/election management systems (VR/EMS), giving the State Board administrative control over the centralized database and the responsibility for auditing the system to assure that the local election officials are conducting the business of voter registration in a compliant manner. State Board personnel visit the County Boards to perform periodic reviews of their NYSVoter procedures, and in 2024, 22 counties were reviewed and found to be in substantial or better compliance with state regulations.

GRANTS

County Boards of Elections have access to funding from federal and state grants managed by the New York State Board of Elections. Funds are authorized annually through the state budget and then administered through a reimbursement process. Each grant has a contract between the County Board of Elections, State Board of Elections, State Comptroller, and Office of General Services. Counties must make their purchases and submit a claim for payment to be reimbursed for eligible expenses. All claims are reviewed by the State Board of Elections to ensure that expenses included in claims are eligible.

In 2024, additional state funding was made available for several grants. The State Legislature appropriated funding for new grant funds including \$14.7 million for the Electronic Poll Book Grant, \$7.7 million for the Ballot by Mail Grant, and \$5 million for the 2024 General Election Grant. These funds were appropriated to County Boards based on total voter enrollment.

State Grants

Early Voting Expansion (EVE) Grant - \$2 Million

Appropriated 2021

Funds were intended to assist County Boards in expanding Early Voting following the policy's initial implementation in 2019. Eligible expenses cover a wide range of Early Voting related expenses including equipment, temporary employees, fees for transporting equipment, etc.

Early Voting Aid to Localities Grant - \$10 Million

Appropriated 2019

Funds were intended to support the initial implementation of Early Voting in 2019. Allowable expenses included costs related to Early Voting such as temporary staff for poll sites, rental fees for poll sites, supplies for poll sites, new voting equipment, equipment transportation fees, and other expenses related to hosting Early Voting poll sites.

E-Poll Book Capital Grant - \$14.7 Million

Appropriated 2019

Funds were intended to support the initial implementation of electronic poll books in 2019. Allowable expenses included the purchase of electronic poll books and associated software, ballot on demand printers, connectivity devices such as routers and network switches, memory devices, security containers, and training for Election Day workers and Board of Elections staff.

Technology Innovation & Election Resource (TIER) Grant - \$35 Million

Appropriated 2021

Funds were intended to allow County Boards to purchase new equipment to replace current aging technologies. Allowable expenses include voting systems and equipment,

absentee ballot scanners, absentee ballot processing and tracking software and equipment, mail processing software and equipment, infrastructure to protect the connectivity and security of county elections software and equipment, assistance for areas with lack of broadband service, software, equipment, and infrastructure, electronic poll book systems and associated software, etc.

Elections Cybersecurity Remediation Grant Extension - \$9 million

Appropriated 2021

Funds were intended to address vulnerabilities identified in County Board of Elections risk assessments conducted by the State Board of Elections and NYSTEC. All expenses must be compliant with recommendations made by the State Board.

Pre-Paid Absentee Postage - \$8 million

Appropriated 2022

Funds were intended to cover costs related to implementing the new law requiring that all absentee ballots and absentee ballot applications include pre-paid return postage. Allowable expenses include postage, postage meters and associated supplies/fees, USPS billing and BRM permit fees, envelopes, sealing equipment, shipping supplies, and temporary staff to assist with absentee ballot mailing and processing.

Electronic Poll Book - \$14.7 million

Appropriated 2024

Funds were intended to replace aging electronic poll book equipment purchased in 2019. Allowable expenses include the purchase of electronic poll books and associated software, ballot on demand printers, connectivity devices such as routers and network switches, memory devices, security containers, and training for Election Day workers and Board of Elections staff.

Ballot by Mail - \$7.7 million

Appropriated 2024

Funds were intended to cover costs related to implementing the new law requiring that all absentee ballots and absentee ballot applications include pre-paid return postage. Allowable expenses include postage, postage meters and associated supplies/fees, USPS billing and BRM permit fees, envelopes, sealing equipment, shipping supplies, and temporary staff to assist with absentee ballot mailing and processing.

2024 General Election - \$5 million

Appropriated 2024

Funds were intended to cover operating costs related to the 2024 General Election, provided that all allowable expenses do not supplant current local expenditures of federal, state, or local funds that the county was currently spending for the administration of elections. Allowable expenses included temporary workers, costs related to opening additional poll sites, printing of ballots, additional equipment, and supplies.

HAVA Grants

The Help America Vote Act (HAVA) has provided funds to the State of New York for poll worker training, voter education, and poll site accessibility. Since June 2006, the State Board has been overseeing the grant application process for, as well as the disbursement of, federal and state funds in order to further the HAVA and State program objectives. The Poll Site Access Improvement Program provides funds to County Boards of Elections to assist them in ensuring that all New York polling places are accessible and provide the same opportunity for all voters to participate in the election process. The Voter Education and Poll Worker Training Program provides funds to County Boards of Elections to implement programs to educate poll workers and the public on the proper use of new voting systems.

HAVA Voter Education & Poll Worker Training Grant

Can be used for voter education concerning voting procedures, voting rights, and voting technology (i.e. county telephone hotlines, media advertising, website design, mailing programs, voter and media outreach), as well as poll worker training.

Shoebox (Submission of HAVA Operations Expenses by CBOEs)

As New York's Help America Vote Act fund distribution program does not provide for the direct release of federal funds to counties, in the overall scope of compliance with HAVA, a separate program was created to enable the reimbursement of county funds that were expended in the name of either implementing HAVA or furthering the goals and objectives of HAVA. For the purchase of products and services related to the overall HAVA project which were not part of the vendor contracts themselves, this program was created and came to be known as the SHOEBOX Program (Submission of HAVA Operations Expenses by Boards of Elections). SHOEBOX funds can be used for any purpose supporting a federal election.

ELECTION OPERATIONS UNIT

The major responsibilities of the Election Operations Unit of the New York State Board of Elections include the oversight and support of New York State's sixty-two County Boards of Elections, the facilitation of ballot access efforts by candidates for a variety of public offices and party positions, and oversight of and technical assistance for the statewide deployment of voting systems. The Election Operations Unit actively engages in ongoing daily communications with County Boards of Elections and the general public on a multitude of topics.

Candidate Ballot Access

In 2024, the Presidential Primary Election was held on April 2, 2024, the Federal and State Primary was held on June 25, 2024, and the General Election was held on November 5, 2024. Additionally, three Special Elections were held in 2024. Special Elections for Congressional District 3 and Assembly District 77 were held on February 13, 2024, and a Special Election for Congressional District 26 was held on April 30, 2024.

This activity consisted of the filing of the following petitions and nominations for President/Vice President and Electors:

- 9 (3 Designating/6 Independent) for the office of President/Vice President;
- 6 Statewide Nationally Known Letters for the office of President;
- 1 Statewide Matching Funds Letter for the office of President;
- 9 Statewide Nominations for the office of President/Vice President/Electors;
- 18 General Objections (5 Designating/13 Independent) for the office of President/Vice President;
- 9 Specific Objections (2 Designating/7 Independent) for the office of President/Vice President;
- 111 Acceptances for the office of President/Vice President/Electors;

The following petitions were filed with respect to federal offices:

- 66 (62 Designating/4 Independent) for Representative in Congress
- 5 (4 Designating/1 Independent) for US Senate
- 4 Certificates of Designation for US Senate

The following filings relating to petitions for federal offices were received, posted, and acknowledged:

- 29 Acceptances (27 Designating/2 Independent) for Representative in Congress
- 25 Authorizations (Designating) for Representative in Congress
- 1 Declination (Designating) for Representative in Congress
- 0 Substitutions for Representative in Congress

- 8 Acceptances (7 Designating/1 Independent) for US Senate
- 3 Authorizations (Designating) for US Senate
- 0 Declinations for US Senate
- 0 Substitutions for US Senate

Objections and corresponding specifications received, posted, and researched for federal offices, were as follows:

- 47 General Objections (41 Designating/6 Independent) for Representative in Congress
- 27 Specific Objections (25 Designating/2 Independent) for Representative in Congress
- 8 General Objections (Designating) for US Senate
- 2 Specific Objections (Designating) for US Senate

The following petitions were filed with respect to state offices:

- 66 (65 Designating/1 Independent) for New York State Senate
- 142 (135 Designating/7 Independent) for New York State Assembly
- 20 Designating Petitions for State Committee positions
- 66 Designating Petitions for Judicial Delegates/Alternates
- 1 Independent Nominating Petition for Supreme Court Justice
- 16 Certificates of Nomination for Supreme Court Justice

Objections and corresponding specifications received, posted, and researched, were as follows:

- 16 General Objections (Designating) for State Senate
- 8 Specific Objections (Designating) for State Senate
- 35 General Objections (16 Designating/19 Independent) for State Assembly
- 19 Specific Objections (9 Designating/10 Independent) for State Assembly
- 1 General Objections (Designating) for State Committee
- 0 Specific Objections for State Committee
- 3 General Objections (Designating) for Judicial Delegates/Alternates
- 1 Specific Objections for Judicial Delegates/Alternates

The following filings made in relation to petitions were received by the Unit:

- 1 Certificates of Declination (Designating) for State Senate
- 1 Certificates of Substitution (Designating) for State Senate
- 38 Acceptances (37 Designating/1 Independent) for State Senate
- 31 Authorizations (Designating) for State Senate
- 7 Certificates of Declination (Designating) for State Assembly
- 6 Certificates of Substitution (Designating) for State Assembly
- 74 Acceptances (68 Designating/6 Independent) for State Assembly

- 60 Authorizations (Designating) for State Assembly
- 0 Certificates of Declination for State Committee
- 0 Certificates of Substitution for State Committee
- 0 Acceptances for State Committee
- 0 Authorizations for State Committee
- 5 Certificates of Declination (Designating) for Judicial Delegates/Alternate Delegates
- 0 Certificates of Substitution for Judicial Delegates/Alternate Delegates

A total of 16 Certificates of Nomination were filed from the eight Judicial Districts that had vacancies. As a result, 45 candidates were nominated for Supreme Court Justice. All information was entered into the candidate management system and all candidates were sent acknowledgement letters. Additionally, the following documents pertaining to filings made for Supreme Court were received:

- 92 Acceptances for Supreme Court Justice
- 1 Authorization for Supreme Court Justice
- 0 General Objections for Supreme Court Justice
- 0 Specific Objections for Supreme Court Justice
- 0 Certificates of Declination for Supreme Court Justice
- 0 Certificates of Substitution for Supreme Court Justice

For the Special Election for the 3rd Congressional District, the following documents were received:

- 3 Certificates of Nomination for Representative in Congress
- 3 Acceptances for Representative in Congress
- 2 Authorizations for Representative in Congress
- 0 Declinations for Representative in Congress
- 0 Substitutions for Representative in Congress
- 0 General Objections for Representative in Congress
- 0 Specific Objections for Representative in Congress

For the Special Election for the 26th Congressional District, the following documents were received:

- 6 Certificates of Nomination for Representative in Congress
- 4 Acceptances for Representative in Congress
- 3 Authorizations for Representative in Congress
- 0 Declinations for Representative in Congress
- 0 Substitutions for Representative in Congress
- 0 General Objections for Representative in Congress
- 0 Specific Objections for Representative in Congress

Additionally, the Unit was responsible for addressing a considerable volume of post-election activity, which included the collection, recording, and validating of all election results corresponding to the offices noted above. Certificates were prepared for signature by the State Board's Commissioners in their capacity as the State Board of Canvassers. Once certified, certificates were prepared for candidates and delivered to the appropriate legislative clerks and secretaries of the respective governmental entities.

Voting Technology and Support Activities

The Election Operations Unit continues its oversight of the use of voting technology by County Boards of Elections throughout New York. With respect to voting systems in 2024, Unit activities and support included, but were not limited to, the following:

- Help Desk technical support was provided before, during, and after the Primary Election and the General Election, with dedicated staff assigned to assist County Board of Elections personnel in building ballots, running test decks, conducting 3% post-election audits, defining ballot layouts, and related tasks.
- Election Operations staff continued to refine all policies and procedures. Feedback from County Boards of Elections, as well as input received from security vendor NYSTEC, supported the goal of sculpting all the policies and procedures.
- Staff continued to collect and review ballots generated by County Boards of Elections in order to assess the potential for improved usability for voters. Areas of focus were font size, layout, placement of instructions, and overall ballot design.

Cybersecurity of Elections

The Election Operations Unit continues to work collaboratively with other units within the agency toward improving the cybersecurity of the election infrastructure at both the state and county levels. This work has included staff involvement in conversations and activities with various federal, state, and otherwise relevant partners, such as the U.S. Department of Homeland Security, the Center for Internet Security, the Governor's Cybersecurity Advisory Board, and others.

The Unit has participated in the agency's efforts in developing and implementing a plan for improving the cybersecurity posture at both the state and local levels, enhancing incident response planning, and coordinating local, state and federal resources and communications. Staff has presented at conferences for both Election Commissioners and County Information Technology (IT) Directors to ensure that election administrators and the IT staff who support them are properly communicating and coordinating their actions

toward improving the cybersecurity around the election infrastructure.

The Unit has three dedicated staff who focus on cybersecurity matters and develop resources for County Boards. They have prepared guidance for County Boards, reviewed existing procedures for any necessary updates, and participated in other agency efforts around cybersecurity. The Unit continues to educate and position itself to best serve the County Boards of Elections on the topics of cybersecurity and incident response.

Voting Systems and Equipment Upgrades

During 2024, existing voting machine vendors submitted updates to hardware, software, and firmware to improve current technology used by County Boards of Elections. Dominion Voting Systems, ES&S, Hart, and Clear Ballot submitted requested updates for their respective voting machines and election systems. These updates ranged from *de minimis* hardware changes to more expanded projects undertaken in conjunction with NYSBOE's federally certified testing partner. Updates were also submitted for approval to electronic poll book hardware and software by two certified vendors: KNOWiNK and Tenex Software Solutions, Inc. Additionally, a new electronic poll book vendor, ES&S, submitted their software and hardware and obtained approval to become New York State's fourth approved poll book system. Updates were also approved for the certification of Clear Ballot Group's upgrade to ClearCount Central Count Voting System. Submitted updates were reviewed by staff for compliance with existing federal and state laws and regulations and approved by the Board of Elections Commissioners.

Following the certification of new and updated voting systems for New York State in 2023, a major project was taken to replace or upgrade a significant portion of the voting machines around the state. Between upgrade and new installations, the Election Operations Unit acceptance-tested several thousand machines in more than 40 counties around the state.

The Election Operations Unit also engaged in ongoing dialogue with the various certified and approved vendors in New York State to provide feedback, which should lead to continually improving products for both County Boards and the voters of New York State. When a voting registration system vendor unexpectedly announced that they would be ceasing operations and support, the Unit lead coordination efforts to ensure all impacted County Boards of Elections successfully transitioned to new vendors with minimal impact on operations and services to voters.

Statewide County Boards of Elections Operational Support

In addition to election assistance, the Unit provides oversight and support to the daily operations of County Boards of Elections. This includes phone calls, conference calls, emails, customized workshops, site visits tailored to individual counties, informative conference presentations, participation in and appearances at Election Commissioners

Association regional meetings, topical memorandums, and the provision of extensive procedural documents and forms for implementation at the local level. As new regulations emerge or existing topics become heightened areas of interest, the Unit strives to communicate timely and appropriate guidance to County Boards of Elections' personnel.

Additional Unit Activities

In addition to ongoing operational and technical support to County Boards of Elections, public election services, ballot access assistance, and voting system certification and technical support, Election Operations personnel assist other Units in the agency through active participation in workgroups and projects, support of other Board missions affected by staffing shortages, and contributions to various priorities identified by the Agency.

INFORMATION TECHNOLOGY UNIT

The New York State Board of Elections relies heavily on technology to support its mission, and the Information Technology (IT) Unit is responsible for providing the most efficient, cost-effective, and secure technology solutions to meet this need.

The IT Unit maintains a highly complex technology infrastructure of systems and networks to facilitate elections within the state, as well as the business operations of the agency. IT is responsible for all infrastructure management, applications development, systems support, cybersecurity, and end-user support. IT management is also responsible for developing an IT budget and working with various internal and external units to process procurements in accordance with agency and NYS requirements.

As director of the IT Unit, the Chief Information Officer (CIO) participates in strategic planning for the agency and provides recommendations regarding emerging technologies and best-fit solutions to support business functions. Additionally, the CIO is the primary liaison for the Board of Elections to the NYS Office of Information Technology Services (ITS).

Computing Environment and Infrastructure

The State Board operates a complex network environment, connecting BOE offices with its primary and backup datacenters, as well as secure connections to local county systems. The IT Unit is responsible for the design, operation, maintenance and security of this network infrastructure, providing a stable and secure platform for BOE applications. The Board also maintains an internet-accessible network for public applications such as Voter Lookup, Mail Ballot Tracker, Early Vote by Mail and Absentee Ballot Request portals, and Election Night Reporting.

The IT Unit develops, maintains and supports several in-house applications, described below, and ensures that all design and coding are performed with attention to best industry standards and practices. All new applications are designed to meet accessibility standards and utilize responsive design to ensure a consistent user experience across multiple device types including desktop computers, tablets, and mobile phones.

Internal application supported and maintained by the IT Unit include:

- **NYSVoter** – The statewide voter registration database developed and implemented in 2007.
- **NYSBallot** – The statewide electronic ballot transmittal system implemented in 2012 to assist military and civilian voters who live overseas to receive their absentee ballots via email.
- **FIDAS (Financial Disclosure Administration System)** – A database system used by State Board Compliance, Public Campaign Finance Board Enforcement, and

Division of Election Law Enforcement (DELE) staff for the management of the financial disclosure reports for committees and candidates for statewide and local office.

- **CAPAS (Candidate Management System)** – A database system used by State Board Operations staff to administer the candidate petition process as well as create correspondence, ballots, and reports pertaining to elections.
- **National Voter Registration Act (NVRA) Application** – The database application used by the Voter Registration Unit to manage the voter registration sites and transactions.
- **Electronic Filing System (EFS) Software** – The web-based application that committee treasurers and candidates filing on their own use to enter and submit campaign finance disclosure reports to the State Board.
- **Public Reporting** – The public system that logs and tracks the disclosure reports of candidates, ballot access documents including petitions, certificates of nomination, related documents, and their status.
- **Voter Look Up** – The public facing poll site search and voter registration status look up.
- **Absentee Ballot Request Portal** – The public facing portal voters can utilize to request an absentee ballot online.
- **Early Mail Ballot Request Portal** – The public facing portal voters can utilize to request an early mail ballot online.

Public Campaign Finance Software Project

In 2021, the Board began the procurement process seeking a software solution for the Public Campaign Finance Board's public matching funds program and integration of all election applications and systems. An RFP was issued for the software project to redesign the Board's current Electronic Filing System (EFS) software and Public Reporting tool to accommodate enhancements needed for public campaign financing in New York State. Although EFS and Public Reporting had recently been updated, additional developments were needed to allow for the correct calculation of payments, tracking of contributions, and overall improved ease of use for candidates and treasurers.

In 2024, the IT Unit worked with PCFB, Compliance, Election Operations, and the Co-Executive Directors after selection of the vendor to complete the work to engage with the vendor to create business requirements that would translate to the new technology. The IT staff has diligently worked to improve internal skills on the new technology and to assist the vendor in understanding business processes. The work is ongoing.

Partnership with Center for Technology and Government (CTG)

As a result of the work done by the Center for Technology in Government, the IT Unit began an internal assessment of their existing tools and was able to determine that

certain tools could be consolidated, some could be outsourced to managed services providers, and some could be discontinued in favor of more efficient options. In doing so the IT Unit was able to become more cost efficient, able to produce metrics and track procurements more effectively.

Automatic Voter Registration

In 2020, the Governor signed into law statewide Automatic Voter Registration beginning with DMV and eventually adding additional state agencies such as Department of Health and SUNY. In 2023, the Board moved ahead with implementing Automatic Voter Registration using the state's Information Technology Services (ITS). The Board entered a memo of understanding with ITS in 2023 to complete the AVR project and the project is currently ongoing.

Space Planning

As new election and campaign finance policies continue to be enacted by the State Legislature, additional space is required for new staff onboarded by the Board of Elections and the Public Campaign Finance Board. Throughout the year, the IT Unit worked to provide connectivity to various floors in the Board's office location at 40 North Pearl Street in Albany, NY. Construction was completed on the Board's primary location on the 5th floor, and the IT Unit worked to relocate staff throughout the building and provide expanded connectivity to the first, third, fifth, seventh, and tenth floors. Space planning is ongoing.

Network Refresh

The Information Technology infrastructure team spent the better part of 2024 evaluating new network equipment to replace the end-of-life equipment throughout the network, including equipment located in local county boards of elections. The new equipment will improve network performance, provide redundancy, and increase the cyber security capabilities of the agency. The project will commence in 2025.

SECURE ELECTIONS CENTER

In response to reports of possible foreign interference in US elections, the designation of “Elections” as Critical Infrastructure by the US Department of Homeland Security (DHS), and an overall heightened awareness of election security issues, the Board adopted a comprehensive plan to improve the security of elections within the state.

An integral part of this plan was the formation of the Secure Elections Center (SEC) in late 2017. The Center is comprised of dedicated staff from Information Technology, Election Operations and Public Information, and is led by the agency’s Chief Information Security Officer (CISO).

The Center has also established numerous federal, state, local, private, educational, and nonprofit partnerships to facilitate its efforts and promote information exchange. The State Board is also a member of the Multi-State Information Sharing and Analysis Center (MS-ISAC) and Elections Infrastructure Information Sharing and Analysis Center (EI-ISAC).

Incident Response

The SEC has established an Incident Response procedure for all County Boards of Elections that requires a two-part notification to the NYS Division of Homeland Security and Emergency Services (DHSES) and the State Board, through a toll-free number and email address established for this purpose.

In the lead-up to the 2024 Election, with the Executive Chamber, DHSES, State Police, and other state partners, the State Board collaborated on the development of a playbook of responses to potential election risks. This playbook helped standardize the whole-of-state response to issues surrounding elections. The State Board and state partners also participated in an executive-level tabletop exercise facilitated by the U.S. Cybersecurity and Infrastructure Security Agency (CISA) to simulate playbook responses.

The SEC has worked with several NYS counties on security incidents that have had a direct or indirect effect on County Board of Elections systems or operations. The SEC, working with DHSES Critical Incident Response Team (CIRT), has provided guidance to counties on improving their information security posture and, in some cases, required improvements to protect state election infrastructure.

In September 2024, the Board of Elections received mail that contained a suspicious substance. The New York State Board was one of several elections offices across the country that received a similar mailing. The State Board immediately contacted law enforcement and temporarily evacuated the area. Thankfully, the substance was determined not to be hazardous. Following the incident, the Board instituted stricter mail handling procedures and provided additional guidance to County Boards on how to safely

open mail.

Education and Outreach

The State Board has mandated basic Cyber Security Awareness Training for all State and County Board of Elections staff and made this training available free of charge to counties through a purchase of online end-user training from an industry-standard provider.

The State Board, along with partner CISA, presented four regional election security workshops across the state, similar to our initial offering in 2018. Presentations featured information about election security best practices, incident response processes, cybersecurity regulations, voting equipment and software, and combating mis- and disinformation about elections. The tabletop exercises examined coordination and response capabilities during a variety of hypothetical cyber and physical security incidents impacting elections. These sessions were widely attended by County Board, IT, Executive, Public Information, Law Enforcement, and Emergency Management staff.

The State Board and counties also participated in the CISA's Annual Tabletop the Vote National Elections Exercise.

The State Board partnered with CISA to deliver multiple physical security trainings to county board employees. The "Power of Hello" is an informative physical security training focused on how to interact with suspicious persons to elicit motives, as well as how to deescalate conflict. Training was also provided on secure mail handling techniques following several suspicious mail incidents nationwide.

In an effort to ease response and improve security communications, the State Board, with CISA, published an *Election Emergency Response Guide* and *Election Security Safeguards and Resilience* poster and pamphlet series. The *Response Guide* provides County Board of Elections officials with clear and concise directions for responding to and reporting different types of potential security events and hazards. The *Safeguards* document provides clear language on how the state and counties secure New York's elections processes. Several copies of each document were provided to all County Boards for posting in their offices and distribution to partners.

In its outreach efforts, the Board has provided presentations to several groups on our cyber security initiatives and offerings, as well as shared general cyber and election security guidance. Some of these groups include New York State Local Government Information Technology Directors' Association (NYSLGITDA), New York State Association of Counties (NYSAC), New York State Election Commissioners Association (NYECA), and others.

Intrusion Detection and Managed Security Services

Based on an initial risk survey of New York State County Boards of Elections (CBOE) and recommendations of our federal and state security partners, the State Board initiated several programs to immediately improve the security posture of the CBOEs.

The cornerstone of this effort has been the implementation of Intrusion Detection Services (IDS) for all County Boards of Elections across the state. Devices have been purchased and installed for all CBOEs that currently do not have an IDS capability and will provide a centralized monitoring and alerting capability directly to the counties.

The State Board has also implemented an optional third-party Managed Security Services (MSS) program, providing log collection, 24 x 7 monitoring and alerting for 34 counties.

Risk Assessments

In 2018, the State Board contracted for a comprehensive, uniform, and verified Risk Assessment of all County Boards of Elections. This on-site assessment is based on the 88 Best Practices as defined in the Center for Internet Security's (CIS) "A Handbook for Elections Infrastructure Security" and covers both technology and governance. After completion of on-site visits, Assessment Reports were finalized for all counties. In addition to the individual reports, an overall Trends Report was created to inform the "next steps" for the Board's actions in securing the end-to-end of New York State's election infrastructure.

In 2020, the State Board contracted with a separate company to create individualized Risk Mitigation Plans. Working with County Boards of Elections and with County IT staff, these Risk Mitigation Plans were created and approved by the State Board. Grants established to assist counties in implementing these plans, including both short and long-term security goals, continue to be disbursed.

In 2023, the State Board contracted for a reassessment of County Boards of Elections' cybersecurity posture. These virtual reviews, grounded in the Part 6220 Cybersecurity Regulation and Part 6217 Voter Registration System Requirements, are part of an effort to quantify the impact of State Board investments in county cybersecurity, identify any outstanding security gaps, as well as establish a baseline for future cybersecurity funding and service offerings. As counties complete their reviews, they receive a report identifying their strengths, weaknesses, and potential security solutions, as well as an editable scorecard to track their progress going forward.

Election Technology Security

The State Board has sought to secure election technology through our ePollbook and

voter registration system security requirements which address:

- System Design
- Configuration and Access Management
- Vulnerability Management
- Data Security and Recovery
- Logging
- Documentation

Expanding on these practices, the State Board promulgated two new policies in 2024. The *Election Technology System Backup Guidance* consolidates requirements and recommendations from several State Board documents and regulations to provide a starting point for counties conducting backups of election technology systems. The *Election Technology Vendor Remote Access Policy* outlines strict requirements for vendors connecting to County Board systems for maintenance and support.

State Board Security Enhancements

During the past year, we have continued to make significant improvements to increase our overall cybersecurity posture and bolster the security of key election systems and end-to-end infrastructure. These actions included the transition of centralized logging and monitoring to a 24x7x365 managed security provider and consolidation of overlapping security technologies. Various technologies have been utilized to implement backups, multiple layers of firewalls, intrusion detection and prevention systems (IDS/IPS), enhanced malware protection, vulnerability detection, and numerous levels of internal and third-party monitoring.

PUBLIC INFORMATION OFFICE

Media, Social Media, and Public Relations

The Public Information Officer serves as the State Board's spokesperson and is responsible for handling all public and press inquiries. The Public Information Office receives requests from reporters, interested parties, and the general public seeking information on election results, voter registration and enrollment data, petition filings, campaign finance filings, enforcement matters, New York State Election Law, implementation of the Help America Vote Act, the National Voter Registration Act, absentee and early mail voting, the Military and Overseas Voter Empowerment Act, voting machines, cybersecurity, and Board policies. The Public Information Officer produced press releases and advisories throughout the year, which provided information on these topics to the state and national press corps and the public.

This information was also made available via the internet primarily through the State Board's website (elections.ny.gov); X/Twitter ([@NYSBOE](https://twitter.com/NYSBOE)), Facebook (facebook.com/NYSBOE), and Instagram ([@nys.boe](https://instagram.com/nys.boe)) social media accounts; and YouTube channel (youtube.com/user/NYSBOE), along with a wide range of election-related data of interest to New York State voters all over the world.

The Public Information Officer utilized the State Board's social media accounts throughout 2024 to communicate with the general public about important election information. Topics included Early Voting and Election Day information, deadlines for voter registration and ballot requests, upcoming board meeting announcements, poll worker recruitment, and election security. The internet is the primary source of mis- and disinformation about elections. A primary goal of the Public Information Office is to provide facts about elections and voting, as well as dispel myths circulating online.

State Board Website Refresh

As part of the State Board's mission to provide the public with accurate and up-to-date information, the Public Information Office launched a new website for the agency in January 2024. The launch occurred after months of data migration from the old website, as well as reformatting content in a user-friendly and responsive manner. The new website has dynamic content, so visitors can find the most relevant and time sensitive information quickly and easily. There are also added pages about election and voting technology and security on the new site so visitors can understand the processes by which elections in New York State are administered. The Public Information Office keeps the website updated year-round. The website can be viewed at elections.ny.gov.

Election Night Results Reporting

The State Board of Elections provides unofficial election results as part of an Election Night Reporting System. In 2024, the State Board reported results for the Presidential Primary Election held in April, the Federal and State Primary held in June, and the General Election held in November. Additionally, Election Night Results were posted for the two Special Elections were held in 2024. The Special Election for Congressional District 3 and Assembly District 77 held in February and the Special Election for Congressional District 26 held in April.

Freedom of Information Law

The Public Information Officer also serves as the Board's Records Access Officer. They are responsible for processing all FOIL requests received by the agency. The State Board utilizes the GovQA online platform to receive, process, and respond to all FOIL requests. In 2024, 2,157 requests were received by the Records Access Officer. Most requests were for data and records from the State Board's statewide database of registered voters (NYSVoter). Of the requests received, 1,852 were fulfilled/completed, 32 were denied in accordance with the provisions of Section 87 of the Public Officers Law, 31 were withdrawn by the requester, and in 242 instances no records were found or it was not a public records request.

Legal Notices

Pursuant to Section 4-116 of the Election Law, the State Board is required to publish, once in the week preceding any election at which proposed Constitutional Amendments or other propositions or questions are to be submitted to the voters of the state, an abstract prepared by the Attorney General explaining the amendment or question. The amendment, abstract, and question are published in at least one general circulation newspaper in every county of the state and are written to comply with the language requirements of the Voting Rights Act. There was one statewide ballot proposal on the 2024 General Election ballot.

New York State Public Campaign Finance Board (PCFB)

Barbara Lifton
Chair

Brian M. Kolb
Vice-Chair

Keesha Gaskins-Nathan
Commissioner

Cheryl L. Couser
Co-Director

Carl P. Zeilman
Co-Director



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Essma Bagnuola
Commissioner

Henry T. Berger
Commissioner

Anthony J. Casale
Commissioner

Peter S. Kosinski
Commissioner

2024 Annual Report of the New York State Public Campaign Finance Board

2024 Personnel Directory

Commissioners

Barbara Lifton, Chair
Brian M. Kolb, Vice-Chair
Keesha Gaskins Nathan
Essma Bagnuola
Henry Berger
Anthony J. Casale
Peter S. Kosinski

Staff

Cheryl Couser, Co-Director
Carl Zeilman, Co-Director
Bob Eckels, Co-Director
Kathryn Orsino, Deputy Director
William McCann, Counsel
Aaron Suggs, Counsel
Brian Connor, Enforcement Counsel
Anne Tarpinian, Enforcement Counsel
Vikki Gonzalo, Manager
Julia Watjen, Manager

Background

In December 2019, the Campaign Finance Reform Commission (CFRC), created by Part XXX of Chapter 59 of the Laws of 2019, delivered its recommendations for a public campaign finance system to New York’s Governor and leaders in the New York State Legislature. Under the law, these recommendations carried the full effect of legislation unless altered or repealed by December 22, 2019. With no legislative changes made, the recommendations automatically became law on January 1, 2020.

The PCFB was established as a bipartisan unit within the New York State Board of Elections (NYSBOE) to oversee the state’s public campaign finance program. The PCFB consists of the four existing NYSBOE commissioners, along with three additional commissioners—one appointed by the Governor, one by the legislative majority, and one by the legislative minority.

The PCFB’s matching funds program provides public money to candidates running for Governor, Lieutenant Governor, Attorney General, Comptroller, State Senate, and State Assembly if they meet certain eligibility requirements.

The program’s first election cycle began on November 9, 2022, and the first payment of public matching funds was for the 2024 State Senate and Assembly Primary election. The first statewide office application of the public matching funds program will be for the 2026 election cycle.

Small Donor Matching Fund Program with Caps

The public campaign financing program is based on a small donor matching funds model. Candidates must meet certain financial and contributor thresholds to be eligible to receive matching funds.

To be eligible, a candidate for Governor must meet a minimum dollar threshold of at least \$500,000 in contributions from residents of the state, including at least five thousand (5,000) matchable contributions. For Lieutenant Governor, Attorney General, or Comptroller, a candidate must have not less than \$100,000 in contributions from residents of the state, including at least one thousand (1,000) matchable contributions. A candidate for the State Senate must meet a minimum dollar threshold of, at least, \$12,000 in contributions from residents of the particular district, including at least one hundred fifty (150) matchable contributions.

A candidate for State Assembly must meet a minimum dollar threshold of, at least, \$6,000 in contributions from residents of the particular district, including at least seventy-five (75) matchable contributions. The minimum dollar threshold for eligibility for State Senator and Assemblymember is subject to a 1/3 reduction based upon the area median income “AMI” determination in Election Law § 14-203(2)(c).

For statewide offices, the match ratio is \$6 of public funds for each \$1 contributed by in-state residents, with contributions between \$5 and \$250 from these residents eligible to be matched. For state legislative races, the match similarly only applies to contributions of \$5-\$250 from residents of the legislative district, but the match is tiered: The first \$50 contributed is matched at 12:1. Contributions between \$51 and \$150 are matched 9:1 and contributions between \$151 to \$250 are matched at 8:1. When the aggregate contributions from such a contributor for the election cycle go over \$250, the contributions are no longer matchable and any public funds that were received for that contributor in the cycle must be returned.

A candidate for Governor, Attorney General or Comptroller can receive no more than \$3.5 million for a Primary and \$3.5 million for a General Election. A Lieutenant Governor candidate can only receive \$3.5 million for a Primary.¹ State Senate candidates are capped at \$375,000 in a Primary and \$375,000 for the General Election. Assembly candidates are capped at \$175,000 for the Primary and \$175,000 for the General Election. Participating candidates for statewide office are required to participate in at least one debate.

Eligibility and Payment Dates

Once candidates are officially in the program, they can receive matching funds for all eligible contributions. State law requires at least three payment dates within thirty days of the primary election and three payment dates within thirty days of the general election. A primary payment is restricted from being made until after a candidate is on the ballot and, pursuant to State Finance Law, cannot be made any earlier than thirty days after designating petitions or certificates of nomination have been filed, and not later than thirty days after such primary election. For a general election, payment is restricted from being made until the day after the primary election. In 2024, funds were disbursed according to a published calendar and the PCFB made five (5) payments for the primary election and eight (8) payments for the general election.

PCFB Organizational Structure

The PCFB consists of seven commissioners. They are the four existing NYSBOE commissioners, along with three additional commissioners—one appointed by the Governor, one by the State Legislative majority, and one by the State Legislative minority.

The PCFB has an executive team of two Co-Directors, two Deputy Directors, and Counsels office. The PCFB structure contains five sub-units of Audit, Candidate Liaison, Enforcement, Special Projects and Training that all report directly to the Executive Team. The PCFB has shared resources with the State Board of Elections for public information, information technology and human resources.

¹ Under New York Law, the Governor and Lieutenant Governor appear together upon the General Election ballot and run as a single unit.

Counsels' Office

The attorneys in the Counsels' Office are responsible for handling legal matters impacting the Public Campaign Finance Board (PCFB). The office drafts legislation, regulations, and advisory opinions and compiles responses to subpoenas and certain Freedom of Information Law requests. The Counsels' Office also responds to legal questions from candidates, political committees, PCFB staff, and from the public regarding the Public Campaign Finance Program.

2024 Litigation

There was no litigation in 2024.

2024 Regulations

Amended 9 NYCRR Subtitle V Part 6221.16 to require all committees of participating candidates to provide certain contribution cards that include the contributor's phone number or email address.

2024 Board Opinions

The Counsels' Office is responsible for preparing responses to requests for opinions from the Public Campaign Finance Board. These opinions serve to further clarify certain sections of the Election Law. No opinions were issued in 2024.

2024 Legislative Activities

Counsels' Office, in consultation with the executive staff, regularly monitors all legislative action which could impact the Board. Such activities include attending legislative committee meetings, responding to inquiries regarding legislation, and responding to requests for comments on legislation. In addition, Counsels' Office is responsible for drafting all legislative proposals of the Board. No legislation was enacted in 2024 that impacted the PCFB.

Audit Unit

The Audit Unit falls is comprised of three sub-units: Intake and Processing, Audit, and Payments. Intake and Processing is responsible for receiving and processing registration forms, certification forms, treasurer resignations, committee conversions and termination processes, along with the assignment of work to audit staff. Audit staff is responsible for reviewing all campaign financial disclosure reports and related documents, making eligibility determinations, processing and auditing public matching fund claims, conducting compliance reviews, conducting financial audits and bank reconciliation. Payment staff is responsible for creating committee accounts in the Statewide Financial System, calculating

public matching fund payments, entering public matching fund payments in the Commissioner report and making the payments after receiving authorization.

Committee Registrations for 2024 Cycle	333 (11/9/22-11/5/24)
Committee Registrations in 2024 Only	141
PCFB Committees converted to Compliance	20
PCFB Committee Terminations	25
Registrations Received for 2026 Cycle	14

Candidate Liaison Unit

For the 2024 cycle, the Candidate Liaison Unit worked directly with the Audit Unit assisting and auditing committees. The Candidate Liaison Unit is responsible for operating the PCFB Call Center.

Special Projects Unit

The Special Projects Unit was created in Q4 of 2024 and primarily conducts bank reconciliations and complex financial audits of campaign financial data, along with assisting the Enforcement Unit. This unit is responsible for maintaining the payment template, working on the software project, and staying up to date with industry internal control guidelines.

Training Unit

The Training Unit is responsible for the Board's outreach to the public, candidates, treasurers and interested parties. The training team develops training sessions in a number of mediums to train the regulated community. The training team is responsible for ensuring the website is updated, issuing the program primers, developing the annual calendar, and creating all training content. In conjunction with Counsels' Office, the Training Unit also assists with handbook revisions.

The Training Unit is also an integral part of external communications. Outreach has been conducted in a number of ways, including: via our website, utilizing social media accounts, by sending all registered statewide and state legislative candidates an email advising them of the program, attending statewide events promoting the program, and conducting a media campaign to inform potential candidates across the state.

In 2024, the PCFB contracted with OpAD media to conduct a statewide media campaign to increase public awareness and drive the public to our website and social media sites. The 2024 media campaign targeted local newspapers.

53 Trainings	17 Candidate Trainings / 36 Treasurer Trainings
Candidate Training Participants	545 Total
Treasurer Training #1	488
Treasurer Training #2	412
Treasurer Training #3	406

Enforcement Unit

The Enforcement Unit is responsible for investigating and enforcing violations of Article 14 of the Election Law and program rules against committees participating in the Public Campaign Finance Program. The Enforcement Unit is composed of enforcement counsels, investigators, and enforcement clerks. Enforcement counsels oversee the work of investigators and enforcement clerks, and assist committees with compliance as they navigate the complaint process.

In 2024, the PCFB Enforcement Unit received nineteen (19) complaints. Five were closed, one was forwarded to NYSBOE Counsel. The remaining complaints are open.

The PCFB opened eleven (11) investigations in 2024 upon the recommendation of Enforcement Counsel.

There were eight filings due in 2024 by committees, as applicable. The PCFB Enforcement Unit levies fees for late filings and will institute proceedings for failure to file.

January Periodic	7 late filers	0 failure to file
March Periodic	34 late filers	0 failure to file
32 Day Pre-Primary	11 late filers	0 failure to file
11 Day Pre-Primary	7 late filers	0 failure to file
July Periodic	34 late filers	6 failure to file
32 Day Pre-General	10 late filers	2 failure to file
11 Day Pre-General	10 late filers	2 failure to file
27 Day Post-General	8 late filers	2 failure file

In 2024, PCFB enforcement collected \$9,250 in late filing penalties.

2024 Public Matching Fund Program

2024 marked the first year of the implementation of New York State's Public Campaign Finance Program for State Senate and State Assembly. The election cycle began on November 9, 2022, and ended on November 5, 2024.

Candidate participation in the program was robust across several dimensions, including partisan affiliation, geographic regions within New York State, incumbents, first-time candidates, and those running for open seats.

Table 1: Overall Program Registrants²

	Total State Assembly Candidates	Assembly Program Registrants	Program Registrants as a % of Total Assembly Candidates	Total State Senate Candidates	Senate Program Registrants	Program Registrants as a % of Total Senate Candidates
Registered Campaign Committees	336	225	67%	129	103	80%

The program had 328 total participants this cycle, with roughly **70.5% of overall candidate committees, for the office of State Senate or State Assembly, selecting to register in the program. This is a relatively high registration rate for the launch of any matching funds program.**³ While these numbers are encouraging, to further understand the impact of the program it is important to look at participation trends, including understanding how many participants made the ballot and were able to meet the thresholds mandatory for payment. The totals in Table 1 above include all registrants for the program, including those who did not ultimately appear on the ballot or qualify for public funding.

² This table includes all types of campaign committees, including terminated committees.

³ **New York City:** NYCCFB began in 1989 with strong initial participation. By 1993, almost 4 years later, approximately 70% of City Council candidates opted in. **Connecticut (CEP):** In its inaugural 2008 cycle, the Citizens' Election Program saw significant uptake, with 81% of legislative candidates participating. **Washington, D.C.:** The Fair Elections Program, launched for the 2020 elections, attracted participation from around 58% of eligible candidates in its first cycle.

Table 2: Ballot Access by Program Participants

	Total Program Participants Registered for Primary Election	Successfully on Primary Election Ballot	% of Total	Total Program Participants Registered for General Election	Successfully on General Election Ballot	% of Total
State Assembly	74	61	83%	229	150	66%
State Senate	14	12	86%	104	83	80%
Total Program Participants	88	73	83%	333	233	70%

Of the candidates who registered to participate in the matching funds program, most of them were able to successfully achieve ballot access.

Table 3: Program Participants on the Ballot that Received Matching Funds

	State Assembly Program Participants	Candidates that received Matching Funds	% of Assembly Participants that received Matching Funds	State Senate Program Participants	Candidates that received Matching Funds	% of Senate Participants that received Matching Funds
Primary Election	61	57	93 %	12	14	100 %⁴
General Election	150	89	59 %	83	58	70 %

Of the program participants that were able to gain ballot access, most of them met the criteria necessary to receive matching funds. The percentage of participants that received payments were higher for those who ran in Primary Elections. For the General Election, **over half of program participants in both the Assembly and the Senate received matching funds.** It is important to note that there are a variety of reasons a candidate may not receive matching funds, including not meeting eligibility requirements or not seeking funds from the program if they deem it unnecessary.

⁴ During the 2024 Senate election, there were two candidates who received matching funds at the 50% level because their opponent's had primaries, even though they were not on the ballot. They are not included in this table.

Table 4: Total Matching Funds Disbursed⁵

	(Primary Election) Total Matching Funds Disbursed	(General Election) Total Matching Funds Disbursed	Total Matching Funds Disbursed for both Primary and General Elections
State Assembly	\$ 6,865,523.80	\$ 10,206,063.40	\$ 17,071,587.20
State Senate	\$ 2,472,011.01	\$ 15,464,599.03	\$ 17,936,610.04
Total	\$ 9,337,534.81	\$ 25,670,662.40	\$ 35,008,197.20

In the 2024 election cycle, the PCFB distributed approximately \$35 million to qualifying candidates. For the Primary Election, the program distributed a total of \$9.3 million, of which \$6.9 million was allocated to State Senate candidates and \$2.5 million was allocated to State Assembly candidates. In the General Election, the program distributed approximately \$25.6 million, of which \$15 million was allocated to State Senate candidates and \$10 million was allocated to State Assembly candidates.

⁵ Table 4 reflects public matching funds disbursed through December 17, 2024.

AGENCY ADMINISTRATION

The Board's Administrative Office consists of five staff members. The duties of this unit include all personnel administration, purchasing, banking, mail and warehouse operations, and all general agency administrative tasks relating to day-to-day operations. The Board has a "Host Agency" agreement with the Office of General Services for activities related to budgeting, contracts, purchasing, voucher payments and transactional Human Resource functions.

Fiscal Operations

The State Board of Elections received fiscal year 2024-25 appropriations of \$30,600,000 in the General Fund (State Operations), \$806,000 in Special Revenue – Federal funds (State Operations), \$2,125,000 in Special Revenue – Other Funds (State Operations), \$12,700,000 in the General Fund (Aid to Localities), \$5,000,000 in Special Revenue – Federal funds (Aid to Localities), \$100,000,000 in Special Revenue – Other Funds (Aid to Localities), and \$14,700,000 in Capital Projects Funds.

The State Board was granted the following re-appropriations for 2024-2025:

State Operations

- \$2,581,000 by the laws of 2018 for services and expenses related to campaign finance compliance training and compliance reviews, National Voter Registration Act training and compliance reviews, election technology systems operations and securing election systems infrastructure and operations from cyber-related threats including, but not limited to, the creation of an election support center, the development of an elections cybersecurity support toolkit, and providing cyber risk vulnerability assessments and support for local Boards of Elections.
- \$7,000,000 by the laws of 2023 to disburse federal grants in support of improvements to the administration of elections, including enhanced election technology and election security improvements.
- \$13,498,000 by the laws of 2020 to disburse federal grants in support of improvements to the administration of elections, including enhanced election technology and election security improvements.
- \$2,328,000 by the laws of 2018 to disburse federal grants in support of improvements to the administration of elections, including enhanced election technology and election security improvements.
- \$2,239,000 by the laws of 2011 for services and expenses related to the implementation of federal election requirements including the Help America Vote Act of 2002 and the Military and Overseas Voter Empowerment Act of 2009.
- \$241,000 by the laws of 2010 for services and expenses related to the implementation of the Military and Overseas Voter Empowerment Act of 2009.

- \$227,000 by the laws of 2009 for HAVA related expenditures.
- \$680,000 by the laws of 2005 for services and expenses related to the Help America Vote Act of 2002 for services and expenses incurred prior to April 1, 2005.
- \$680,000 by the laws of 2005 for services and expenses related to the Help America Vote Act of 2002 for services and expenses incurred on or after April 1, 2005.
- \$821,000 by the laws of 2018 for expenses including prior year liabilities related to satisfying the matching fund requirements of section 253(b)(5) of the Help America Vote Act of 2002.
- \$408,000 by the laws of 2009 for expenses including prior year liabilities related to satisfying the matching fund requirements of section 253(b) (5) of the Help America Vote Act of 2002.
- \$390,000 by the laws of 2017 for the voting machine examinations account.

Aid to Localities

- \$4,000,000 by the laws of 2023 for reimbursement of costs related to providing pre-paid return postage on absentee ballots and applications.
- \$1,130,000 by the laws of 2022 for reimbursement of costs related to providing pre-paid return postage on absentee ballots and applications.
- \$161,000 by the laws of 2021 for reimbursement of costs related to the expansion of early voting.
- \$79,000 by the laws of 2019 for reimbursement of costs related to the implementation of early voting for eligible expenses.
- \$1,130,000 by the laws of 2006 for services and expenses related to the alteration of poll sites to provide accessibility for disabled voters.
- \$480,000 by the laws of 2009 for services and expenses related to the implementation of the Help America Vote Act of 2002, including the purchase of new voting machines and disability accessible ballot marking devices for use by the local Boards of Elections pursuant to the Help America Vote Act of 2002. Such moneys shall be allocated to the local Boards of Elections in proportion to the percentage of the state's registered voters residing in each local Board's jurisdiction on December 31, 2004.
- \$1,500,000 by the laws of 2009 for services and expenses related to the implementation of the Help America Vote Act of 2002, including the purchase of new voting machines and disability accessible ballot marking devices for use by the local Boards of Elections pursuant to the Help America Vote Act of 2002. Such moneys shall be allocated to local Boards of Elections in proportion to the percentage of the state's registered voters residing in each local Board's jurisdiction on December 31, 2004.
- \$7,923,000 by the laws of 2008 for services and expenses related to the implementation of the Help America Vote Act of 2002, including the purchase of new voting machines and disability accessible ballot marking devices for use by the local Boards of Elections pursuant to the Help America Vote Act of 2002. Such moneys shall be allocated to local Boards of Elections in proportion to the

percentage of the state's registered voters residing in each local Board's jurisdiction on December 31, 2004.

- \$1,178,000 by the laws of 2005 for services and expenses incurred for poll worker training and voter education efforts pursuant to a chapter of the laws of 2005.
- \$3,521,000 by the laws of 2005 for services and expenses related to the purchase of new voting machines and voting systems for use by local Boards of Elections pursuant to the Help America Vote Act of 2002.

Capital Projects

- \$15,000,000 by the laws of 2023 for software and technology upgrades and equipment.
- \$11,041,000 by the laws of 2021 for software and technology upgrades and equipment.
- \$14,909,000 by the laws of 2020 for services and expenses related to the acquisition and development of technology, including, but not limited to, equipment, software, and services, which will support the implementation of the Voter Enfranchisement Modernization Act of 2019, including costs incurred prior to April 1, 2020. A portion of these funds shall be used, as allowable, to satisfy the state match requirement of the 2020 federal HAVA funding.
- \$721,000 by the laws of 2019 for initial technology costs of electronic poll books as authorized in 2019 voter reform legislation. The State Board of Elections shall develop a plan for the distribution of such funds which may include amounts needed for State Board of Elections implementation costs. The remaining funds shall be made available to local Boards of Elections for reimbursement of eligible costs, including, but not limited to, electronic poll books and associated software, on-demand ballot printers, and cybersecurity software required to implement early voting, provided that such reimbursement shall be apportioned based on the number of registered voters in a county. The plan shall include a listing of allowable costs and details of the reimbursement claims process and timeframes, provided that local Boards of Elections' claims shall include such information as necessary to support state financing mechanisms.

DIVISION OF ELECTION LAW ENFORCEMENT

Division of Election Law Enforcement New York State Board of Elections Annual Report 2024

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To: The Honorable Kathy Hochul, Governor Members
of the New York State Legislature Commissioners
of the State Board of Elections

I am pleased to submit to you the following report of the Chief Enforcement Counsel of the Division of Election Law Enforcement, to be included in the 2024 Annual Report of the New York State Board of Elections, pursuant to New York State Election Law §3-104 (7), summarizing the Division of Election Law Enforcement's activities from January 1, 2024, through December 31, 2024.

Respectfully Submitted,

Michael L. Johnson
Chief Enforcement Counsel

Division of Election Law Enforcement

On March 31, 2014, former Governor Andrew Cuomo signed the Public Trust Act into law. The Public Trust Act amended the New York State Election Law to create an interdependent law enforcement unit within the New York State Board of Elections (NYSBOE) known as the Division of Election Law Enforcement (DELE). Pursuant to the new law, former Governor Cuomo chose Risa S. Sugarman as the first Chief Enforcement Counsel (CEC) to head the DELE. The Assembly and Senate both unanimously confirmed the choice, and CEC Sugarman took office on September 1, 2014.

In June 2021, after the retirement of Risa S. Sugarman, former Governor Cuomo chose Michael L. Johnson to head the DELE. Again, the Assembly and Senate unanimously confirmed the choice, and Chief Enforcement Counsel Johnson took office on July 16, 2021.

The law confers upon the CEC the power and duty to conduct all investigations necessary to enforce provisions of the NYS Election Law and other statutes governing campaigns, elections, and related procedures, excluding the public campaign finance program and the fair campaign code. The CEC has sole authority within NYSEOE to investigate alleged violations of such statutes.

DELE Structure and Staffing

Chief Enforcement Counsel Johnson oversees the entire DELE, with an operating budget of \$2,147,000 for Fiscal Year 2024-25. Pursuant to statute, the CEC has sole authority over DELE personnel. The DELE employs an investigative team of experienced attorneys, investigators, auditors, and support staff. At the start of 2024, after his two and a half years at DELE, Chief Enforcement Counsel Johnson's staff included three Associate Counsels, two Special Investigators, three Investigative Auditors, an Election Enforcement Technical Analyst, and two support staff members. By the end of 2024, an Investigative Auditor and a support staff member had retired, and the CEC added another Associate Counsel and a Special Assistant to the DELE team.

DELE Associate Counsels are experienced in investigating, litigating, prosecuting, and defending criminal and civil matters. Investigative and audit staff have extensive investigatory backgrounds within and outside law enforcement, including state law enforcement and state investigative agencies. A member of the audit staff with internal audit experience and certification is designated as the internal controls officer and is responsible for providing the DELE with financial, record, and performance auditing.

The DELE's Elections Enforcement Technical Analyst is the DELE liaison with the NYSEOE's Information Technology Unit. The analyst also assists the DELE in all areas, including maintaining and monitoring the unit's technical infrastructure, acquiring software and hardware, and training staff on new systems. Additionally, the Elections Enforcement Technical Analyst has been charged with the strategic planning for DELE's system integrity

and continuity in maintaining the security and accessibility of DELE's software and hardware inventory. Finally, with the increasing role of technology and computers in elections, the DELE Technical Analyst is also a valuable resource when the DELE investigates cases involving computer use.

The CEC and Special Investigators are NYS Division of Criminal Justice Services certified peace officers. According to NYS Election Law §3-107(5), "Any such special investigator also shall have all of the powers of a peace officer as set forth in section 2.20 of the criminal procedure law, for the purpose of enforcing the provisions of this chapter."

DELE Complaint Intake Processes

The DELE receives complaints about elections and campaign finance issues in New York State. Pursuant to NYS Election Law, when a complaint is received, the CEC sends a letter acknowledging receipt of the complaint. The CEC then reviews the complaint to determine whether or not it would constitute a violation of the NYS Election Law. If the CEC determines that an allegation, if true, would not constitute a violation of the NYS Election Law or that an allegation is not supported by credible evidence, a letter dismissing the complaint is issued to the complainant.

When the CEC determines that an allegation, if true, would constitute a violation of the NYS Election Law, the CEC opens a case. Based on the allegations made, potential investigative work to be done, and/or staff workload, among other factors, the CEC decides whether to assign the case to an attorney, an investigator, an auditor, or an investigative team. Once a staff member or members are assigned a case, they investigate the allegation(s) and collect the necessary evidence to assist the CEC in determining an appropriate disposition. To obtain relevant evidence, the CEC may request that the NYSBOE delegate its authority to the CEC to administer oaths and affirmations, subpoena witnesses, compel their attendance, examine them under oath or affirmation, and require the production of any documents or other evidence relevant or material to the investigation.

While the evidence and the law guide the CEC's decisions to proceed with civil enforcement actions, the NYS Election Law gives the CEC discretion whether to initiate civil enforcement matters before a hearing officer, either upon the CEC's initiative or based upon a referral from the NYSBOE Compliance Unit. All referrals from the Compliance Unit are reviewed to determine whether they meet the statutory requirements for filing a hearing officer proceeding. The CEC must be able to allege in a written report that there is a substantial reason to believe a violation of the NYS Election Law exists. In addition, to avoid dismissal of the proceeding, the DELE must prove that the violation is not *de minimis* and that the subject of the complaint did not make a good-faith effort to correct the current violation, as well as any previous violations they may have.

Once a case investigation is complete, the CEC will issue a final determination, which is presented to the NYSBOE Commissioners at the next scheduled Board Meeting. After the

determination has been presented to the Commissioners, the CEC will send a copy to the complainant, and a copy of the determination will be posted on DELE's website.

Common Complaints from the Public

Complaints are continuously received and reviewed by DELE. These complaints are received by email, regular mail, and via a link on the DELE website (enforcement@elections.ny.gov). All complaints received by the DELE are confidential, and the identities of complainants and the existence of particular investigations are held in the strictest confidence. Complaints the DELE receives are sometimes unique but often fall into familiar and repeating categories. A few of these categories include:

- *Failure to File.* These are complaints typically received within days of filing deadlines, which point to the failures of particular candidates or committees to file required campaign financial disclosure statements in a timely manner. Although some of these complaints expose serial non-filers whose continual nonfeasance may require further legal action by the DELE, most complaints point out isolated incidents of a particular candidate or committee missing a filing deadline. Typically, these issues are resolved when the candidate or committee files the required report before DELE takes action.
- *Campaign Activity or Election Day conduct.* These complaints include allegations of candidates using false or misleading information on their campaign materials, electioneering at polling places on Election Days, or improperly expended committee or candidate campaign monies.
- *Failure to attribute or allocate.* These complaints include the failure of a committee to place the statutorily required "Paid for" attribution on campaign materials. Investigations have determined that some reasons for the failure to include attributions have been unfamiliarity with the NYS Election Law and printing errors, as well as intentional exclusion to avoid identifying the responsible party.

DELE Business Process Automation (BPA)

In 2024, the DELE made significant strides in leveraging technology to enhance operational efficiency and improve service delivery. One of our major initiatives involved streamlining the complaint intake and tracking process by implementing a new system that would reduce manual input, eliminate redundancies, and ensure timely resolution. In parallel, we developed a robust case management system built on a content management platform, allowing for more effective tracking of case progress and centralized document management. These systems have greatly enhanced our ability to manage increasing workloads while maintaining accuracy and accountability. Enhancements were also made to improve our office's physical security infrastructure.

In addition to these advancements, we introduced a comprehensive asset management system to track the full life cycle of equipment acquisitions, from procurement to disposal. A financial tracking system was also developed to manage the collection of settlements, fines, and judgments with greater transparency and control. Each system includes backend automation features that minimize common errors, improve staff productivity, and strengthen auditing capabilities. Furthermore, we incorporated business intelligence tools to enable real-time reporting, supporting data-driven decision-making across the organization. Notably, all these systems were developed in-house by our enforcement technical analyst in collaboration with staff, reflecting our ongoing commitment to innovation, efficiency, and technological self-reliance.

DELE Website and Online Complaint Form **(<https://electionenforcement.ny.gov>)**

On November 1, 2022, prior to the general election, DELE launched its website. The site describes the DELE, its history and structure, and NYS Election Law issues. It also has a section that allows the public and press access to the CEC's final determinations of cases. The DELE website includes a page with multiple links to useful election resources. The site also has a periodically updated message from CEC Johnson centered on current topics involving NYS Election Law from an enforcement perspective. Throughout 2024, DELE staff continuously updated and readjusted the website to maintain compliance with NYS standards.

In June 2023, the DELE announced a new Online Complaint Intake Form (OCIF) for the convenience of anyone who would like to file a complaint of an alleged violation of the NYS Election Law. During 2024, the DELE received approximately 80% of its complaints through the website, using the OCIF.

DELE Statistics

In 2024, the DELE received 808 verified complaints, with which the CEC conducted the initial intake review process as previously described. As a result of the review process, the CEC found that approximately 583 did not necessitate the opening of a case. The CEC formally opened 69 cases, and at the end of 2024, the remaining complaints were still pending review. In 2024, the CEC also presented 86 cases to the NYSBOE Commissioners for closure. This number included cases that had been opened prior to the start of 2024. Additionally, no cases were referred to the NYSBOE Commissioners for further action.

During that same timeframe, the DELE collected \$40,850.00 through settlement agreements. Additionally, \$4,850.91 was obtained from judgments issued before CEC Johnson's appointment.

DELE Delinquent Filer Notices

According to NYS Election Law, active candidates and/or political committees are statutorily required to file campaign financial disclosure statements at least twice yearly (January and July Periodic Reports). Under NYS Election Law §14-108(5), the CEC is responsible for sending out notices via certified mail to those candidates and/or political committees who are delinquent with filing those Reports. Although NYS Election Law does not require it, the DELE adopted the practice of sending email reminders to committees/candidates who failed to file their required periodic reports. The email reminders were found to have a substantial impact in encouraging delinquent filers to submit their reports, albeit late. Therefore, the number of certified letters that DELE staff had to send out was reduced, ultimately saving a significant amount of money for the DELE and NYS taxpayers.

Delinquent Filer Mailings Procedure

The Delinquent Filer Mailing Procedure was identified as an area that could be improved using Business Process Automation (BPA). The administrative directive for DELE to send out Delinquent Filer Notices has long resulted in a redundant, onerous, and time-consuming task. The CEC and DELE staff worked to identify which steps of the procedure could be transitioned to BPA to increase efficiency and reduce human error.

Previously, each Delinquent Filer Mailing required DELE staff and resources to be fully occupied for nearly a week. However, using BPA, a Delinquent Filer Mailing can now be completed in less than two days. Some of these improvements can also be attributed to the DELE working with the NYSBOE Compliance and Information Technology Units to tailor the Delinquent Filer Report to include information previously entered through a manual match. This resulted in significant time savings. The standardization of the letters themselves allowed the use of envelopes that didn't require a separate address to be placed on them.

2024 January Periodic Report

On January 26, 2024, DELE staff sent 2,813 Delinquent Filer email notices to committees/candidates who had not yet filed their 2024 January Periodic Report. After sending the emails, DELE staff determined that 108 of the committees on the delinquent filer list did not have an email address on file. An additional 138 emails were “*bounced back*” as having invalid or undeliverable email addresses.

On February 8, 2024, the DELE staff mailed 2,121 Delinquent Filer letters via certified mail to committees/candidates still delinquent in filing their 2024 January Periodic Report. The cost per certified letter was \$5.04, resulting in a total cost of \$10,689.84 for certified mail. Of these, 717 letters were returned to the DELE as “*not delivered*,” resulting in a loss of at least \$3,613.68.

On February 8, 2024, the DELE staff also sent 1,547 statutory letter notices to candidates whose authorized committees were delinquent in filing their 2024 January Periodic Report. These letters were sent via first-class mail, at \$0.64 a piece, totaling \$990.08. Of these, 256

letters were returned to the DELE as “*not delivered*,” resulting in a loss of at least \$163.84.

2024 Primary Election Cycle Reports

Due to the time-sensitive nature of election cycle reporting, the DELE sent emails to committees/candidates who had not yet filed Primary Election Cycle Reports within days of the filing due date. In addition to increasing compliance with reporting requirements, this helped to identify candidates/committees that were no longer required to file these reports. There were multiple reasons those candidates/committees were no longer required to file, and those entities involved were referred to NYSBOE’s Compliance Unit. This resulted in more accurate records within NYSBOE and ultimately for the public.

On July 23, 2024, DELE staff sent 3,353 Delinquent Filer email notices to committees/candidates who had not yet filed their 2024 July Periodic Reports. After sending the emails, DELE staff determined that 15 of the committees on the delinquent filer list did not have an email address on file. An additional 68 emails were “*bounced back*” as having invalid or undeliverable email addresses.

On August 31, 2024, DELE staff mailed out 1,964 Delinquent Filer letters via certified mail to committees/candidates who had still not filed their 2024 July Periodic Reports. The cost per certified letter was \$5.54, resulting in a total cost of \$10,880.56 for certified mail. Of these, 671 letters were returned to the DELE as “*not delivered*,” resulting in a loss of at least \$3,717.34.

On August 31, 2024, the DELE staff also sent 1,297 statutory letter notices to candidates whose authorized committees were delinquent in filing their 2024 July Periodic Report. These letters were sent via first-class mail, at \$0.69 a piece, totaling \$894.93. Of these, 186 letters were returned to the DELE as “*not delivered*,” resulting in a loss of at least \$128.34.

2024 General Election Cycle Reports

Due to the time-sensitive nature of election cycle reporting, the DELE proactively emailed committees and candidates who had not yet submitted their General Election Cycle Reports within days of the filing deadlines. As with the 2024 Pre-Primary delinquent filer emails, this approach improved compliance with reporting requirements and helped identify candidates and committees no longer obligated to file. The reasons for these exemptions varied, and such cases were referred to the NYSBOE’s Compliance Unit. As a result, the NYSBOE’s records and the information available to the public became more accurate.

DELE Mass Delinquent Filer Court Proceeding

When the DELE was created in 2014, new procedures for obtaining penalties against violators of the NYS Election Law, including filers who failed to file or filed late, were enacted in the NYS Election Law. During his first full year as CEC, CEC Johnson observed all the

statutory requirements for this process, called the Hearing Officer Process. The CEC concluded that the Hearing Officer Process was not feasible as an enforcement measure against delinquent filers. As a result, the CEC worked with NYSBOE Executive Directors and Counsel to introduce a new regulation to permit the bypassing of the Hearing Officer Process for filers that had failed to file, or did not timely file, any campaign financial disclosure statement required by NYS Election Law. Title 9 of the New York Codes, Rules, and Regulations §6218.13 is the new procedure adopted, effective August 30, 2023.

With the adoption of this new regulation, it was determined that a sample of the 2023 July Periodic Report Delinquent Filers would be selected as a “test case.” Since this was the first attempt at a new procedure for the DELE, the CEC decided that a random selection of 25 committees would be made. As this is a test case, the number needed to be large enough to make estimates for future larger filings and small enough to be manageable by the assigned DELE Associate Counsel.

DELE utilized the NYS Courts e-file (NYSCEF) system. Most cases filed in NYS Courts are required to be filed electronically, with few exceptions. Utilizing the methods previously used by NYSBOE in delinquent filer proceedings, the DELE submitted the 25 committees as a single court action. It took the assigned Associate Counsel almost six hours to enter the required information into the NYSCEF e-file portal. As a result, the DELE is aiming to work with NYSCEF to find an alternative to the manual entry of the respondent committees’ information. This will make filing these proceedings much more efficient in the future, as an attorney’s time is much better spent elsewhere. DELE will be evaluating available options to utilize BPA as a possible method to assist with the required burdensome data entry.

The initial test case for a Mass Delinquent Filer Court Proceeding against 25 respondents filed on October 25, 2023, resulted in 21 pre-judgment and one post-judgment settlements, one judgment docketed onto the judgment roll, and two discontinuances without prejudice for issues relating to the process of service.

The DELE upscaled the second such proceeding to be against 176 respondents and filed that proceeding on March 12, 2024. This second proceeding resulted in 66 pre-judgment and three post-judgment settlements, 26 judgments docketed onto the judgment roll, one satisfaction of judgment off the judgment roll, and 82 discontinuances without prejudice for issues relating to process of service.

DELE Three or More Delinquent Filings in an Election Cycle

The Public Integrity Reform Act of 2011 amended NYS Election Law §14-126(1) by adding the following to the existing statute: “Any person who, three or more times within a given election cycle for such term of office, fails to file a statement or statements required to be filed by this article, shall be subject to a civil penalty, not in excess of ten thousand dollars, to be recoverable as provided for in this subdivision.” With the improved efficiency of the Delinquent Filer Mailings Procedure and the improved accuracy of the Delinquent Filer

Report, the CEC felt confident to set another goal to tackle the issue of filers who haven't filed three or more timely reports within a given Election Cycle. Although this penalty had been sought and received by the DELE in other matters, the CEC had not initiated cases where this was the sole violation alleged.

As previously mentioned, when the DELE was created in 2014, new procedures for obtaining penalties against violators of the NYS Election Law, the Hearing Officer Process, were enacted. As a result, to pursue penalties for this violation, all cases would need to proceed through the Hearing Officer Process prior to the filing of a court proceeding. Using a variation of a yes or no elimination procedure, DELE staff were left with 30 delinquent filers who met the criteria.⁶ This group of delinquent filers was presented to the CEC for review. The CEC decided to use the entire group that had been identified and initiated 30 cases, evenly distributing them to DELE's Associate Counsels for possible hearing officer action. By the end of 2024, the DELE's Associate Counsels had resolved 16 of the 30 cases, with 14 remaining active investigations.

⁶ A yes or no elimination procedure is a selection process that uses binary questions to eliminate possible options. This method is useful as it creates a definitive positive or negative result which prevents the intentional or accidental influence of the selector's bias(es).

NYSVoter Enrollment by County, Party Affiliation and Status

Voters Registered as of November 01, 2024

REGION	COUNTY	STATUS	DEM	REP	CON	WOR	OTH	BLANK	TOTAL
Outside NYC	Albany	Active	102,076	37,279	3,757	1,105	7,266	57,337	208,820
Outside NYC	Albany	Inactive	4,629	1,742	167	50	450	2,836	9,874
Outside NYC	Albany	Total	106,705	39,021	3,924	1,155	7,716	60,173	218,694
Outside NYC	Allegany	Active	5,266	13,851	526	137	1,066	6,041	26,887
Outside NYC	Allegany	Inactive	327	516	23	6	70	405	1,347
Outside NYC	Allegany	Total	5,593	14,367	549	143	1,136	6,446	28,234
Outside NYC	Broome	Active	45,243	43,179	1,800	777	5,560	32,675	129,234
Outside NYC	Broome	Inactive	6,695	5,054	205	142	1,087	4,634	17,817
Outside NYC	Broome	Total	51,938	48,233	2,005	919	6,647	37,309	147,051
Outside NYC	Cattaraugus	Active	12,487	20,249	1,224	243	2,022	11,533	47,758
Outside NYC	Cattaraugus	Inactive	1,077	1,406	89	22	227	1,210	4,031
Outside NYC	Cattaraugus	Total	13,564	21,655	1,313	265	2,249	12,743	51,789
Outside NYC	Cayuga	Active	14,592	18,204	1,452	310	1,787	13,102	49,447
Outside NYC	Cayuga	Inactive	708	809	56	18	137	773	2,501
Outside NYC	Cayuga	Total	15,300	19,013	1,508	328	1,924	13,875	51,948
Outside NYC	Chautauqua	Active	23,296	28,824	2,051	481	3,810	21,769	80,231
Outside NYC	Chautauqua	Inactive	1,668	1,754	132	51	380	1,947	5,932
Outside NYC	Chautauqua	Total	24,964	30,578	2,183	532	4,190	23,716	86,163
Outside NYC	Chemung	Active	14,905	21,474	905	262	2,557	12,884	52,987
Outside NYC	Chemung	Inactive	1,120	1,314	55	17	259	1,178	3,943
Outside NYC	Chemung	Total	16,025	22,788	960	279	2,816	14,062	56,930
Outside NYC	Chenango	Active	6,821	13,616	551	154	1,421	7,798	30,361
Outside NYC	Chenango	Inactive	484	772	36	8	148	611	2,059
Outside NYC	Chenango	Total	7,305	14,388	587	162	1,569	8,409	32,420
Outside NYC	Clinton	Active	17,122	15,999	605	275	2,686	13,844	50,531
Outside NYC	Clinton	Inactive	993	758	28	16	199	2,043	4,037
Outside NYC	Clinton	Total	18,115	16,757	633	291	2,885	15,887	54,568

Outside NYC	Columbia	Active	18,829	12,237	1,019	305	1,931	12,529	46,850
Outside NYC	Columbia	Inactive	2,122	1,187	101	25	333	1,372	5,140
Outside NYC	Columbia	Total	20,951	13,424	1,120	330	2,264	13,901	51,990
Outside NYC	Cortland	Active	8,770	10,822	497	133	1,318	7,874	29,414
Outside NYC	Cortland	Inactive	734	751	43	9	127	857	2,521
Outside NYC	Cortland	Total	9,504	11,573	540	142	1,445	8,731	31,935
Outside NYC	Delaware	Active	8,532	12,819	549	137	1,306	7,095	30,438
Outside NYC	Delaware	Inactive	560	682	38	6	137	592	2,015
Outside NYC	Delaware	Total	9,092	13,501	587	143	1,443	7,687	32,453
Outside NYC	Dutchess	Active	77,237	56,327	3,898	1,031	9,089	60,384	207,966
Outside NYC	Dutchess	Inactive	8,973	5,485	396	102	1,237	6,431	22,624
Outside NYC	Dutchess	Total	86,210	61,812	4,294	1,133	10,326	66,815	230,590
Outside NYC	Erie	Active	285,901	161,863	15,434	3,918	19,769	151,674	638,559
Outside NYC	Erie	Inactive	16,715	7,689	552	130	1,294	7,158	33,538
Outside NYC	Erie	Total	302,616	169,552	15,986	4,048	21,063	158,832	672,097
Outside NYC	Essex	Active	7,647	10,601	301	98	1,286	5,860	25,793
Outside NYC	Essex	Inactive	615	707	23	6	141	561	2,053
Outside NYC	Essex	Total	8,262	11,308	324	104	1,427	6,421	27,846
Outside NYC	Franklin	Active	9,492	9,522	395	118	1,303	6,479	27,309
Outside NYC	Franklin	Inactive	690	617	28	10	137	598	2,080
Outside NYC	Franklin	Total	10,182	10,139	423	128	1,440	7,077	29,389
Outside NYC	Fulton	Active	7,008	16,648	692	155	1,393	8,177	34,073
Outside NYC	Fulton	Inactive	481	818	51	17	135	661	2,163
Outside NYC	Fulton	Total	7,489	17,466	743	172	1,528	8,838	36,236
Outside NYC	Genesee	Active	8,535	17,497	1,081	187	1,630	10,007	38,937
Outside NYC	Genesee	Inactive	410	701	44	10	118	503	1,786
Outside NYC	Genesee	Total	8,945	18,198	1,125	197	1,748	10,510	40,723
Outside NYC	Greene	Active	9,189	12,446	801	169	1,459	9,289	33,353
Outside NYC	Greene	Inactive	929	1,060	62	17	231	929	3,228
Outside NYC	Greene	Total	10,118	13,506	863	186	1,690	10,218	36,581

Outside NYC	Hamilton	Active	851	2,385	76	8	4	917	4,241
Outside NYC	Hamilton	Inactive	33	81	1	0	4	38	157
Outside NYC	Hamilton	Total	884	2,466	77	8	8	955	4,398
Outside NYC	Herkimer	Active	8,987	19,319	799	142	2,092	9,009	40,348
Outside NYC	Herkimer	Inactive	544	785	32	8	175	602	2,146
Outside NYC	Herkimer	Total	9,531	20,104	831	150	2,267	9,611	42,494
Outside NYC	Jefferson	Active	15,075	26,463	1,068	235	2,202	16,644	61,687
Outside NYC	Jefferson	Inactive	1,520	1,547	57	30	265	2,304	5,723
Outside NYC	Jefferson	Total	16,595	28,010	1,125	265	2,467	18,948	67,410
Outside NYC	Lewis	Active	3,505	9,566	349	44	689	3,462	17,615
Outside NYC	Lewis	Inactive	453	878	45	8	156	543	2,083
Outside NYC	Lewis	Total	3,958	10,444	394	52	845	4,005	19,698
Outside NYC	Livingston	Active	10,151	17,933	947	140	1,694	10,218	41,083
Outside NYC	Livingston	Inactive	521	696	55	5	121	566	1,964
Outside NYC	Livingston	Total	10,672	18,629	1,002	145	1,815	10,784	43,047
Outside NYC	Madison	Active	11,568	17,258	935	215	2,324	11,933	44,233
Outside NYC	Madison	Inactive	1,245	1,282	62	15	259	1,190	4,053
Outside NYC	Madison	Total	12,813	18,540	997	230	2,583	13,123	48,286
Outside NYC	Monroe	Active	206,339	127,172	8,442	2,185	17,768	137,775	499,681
Outside NYC	Monroe	Inactive	18,030	9,219	552	196	1,787	11,864	41,648
Outside NYC	Monroe	Total	224,369	136,391	8,994	2,381	19,555	149,639	541,329
Outside NYC	Montgomery	Active	8,577	11,072	804	146	1,369	8,228	30,196
Outside NYC	Montgomery	Inactive	556	499	42	9	102	571	1,779
Outside NYC	Montgomery	Total	9,133	11,571	846	155	1,471	8,799	31,975
Outside NYC	Nassau	Active	385,603	306,252	9,701	2,318	26,756	277,756	1,008,386
Outside NYC	Nassau	Inactive	35,425	25,857	815	222	2,934	22,489	87,742
Outside NYC	Nassau	Total	421,028	332,109	10,516	2,540	29,690	300,245	1,096,128
Outside NYC	Niagara	Active	49,987	49,610	3,840	1,334	6,031	33,102	143,904
Outside NYC	Niagara	Inactive	3,362	2,769	198	101	513	2,571	9,514
Outside NYC	Niagara	Total	53,349	52,379	4,038	1,435	6,544	35,673	153,418
Outside NYC	Oneida	Active	42,509	53,191	2,306	560	6,932	32,965	138,463

Outside NYC	Oneida	Inactive	2,612	2,188	124	34	459	2,052	7,469
Outside NYC	Oneida	Total	45,121	55,379	2,430	594	7,391	35,017	145,932
Outside NYC	Onondaga	Active	120,241	85,008	5,227	1,564	12,594	95,258	319,892
Outside NYC	Onondaga	Inactive	7,065	4,464	293	66	849	5,271	18,008
Outside NYC	Onondaga	Total	127,306	89,472	5,520	1,630	13,443	100,529	337,900
Outside NYC	Ontario	Active	23,127	29,013	1,575	240	3,233	21,461	78,649
Outside NYC	Ontario	Inactive	1,631	1,885	112	22	367	1,946	5,963
Outside NYC	Ontario	Total	24,758	30,898	1,687	262	3,600	23,407	84,612
Outside NYC	Orange	Active	93,132	75,786	5,177	1,454	10,062	67,677	253,288
Outside NYC	Orange	Inactive	7,827	6,389	385	94	1,095	6,020	21,810
Outside NYC	Orange	Total	100,959	82,175	5,562	1,548	11,157	73,697	275,098
Outside NYC	Orleans	Active	5,137	12,335	644	136	894	6,391	25,537
Outside NYC	Orleans	Inactive	126	314	28	4	55	182	709
Outside NYC	Orleans	Total	5,263	12,649	672	140	949	6,573	26,246
Outside NYC	Oswego	Active	17,471	35,587	1,889	348	3,126	19,714	78,135
Outside NYC	Oswego	Inactive	628	1,173	60	13	148	749	2,771
Outside NYC	Oswego	Total	18,099	36,760	1,949	361	3,274	20,463	80,906
Outside NYC	Otsego	Active	11,121	14,128	583	155	1,630	9,388	37,005
Outside NYC	Otsego	Inactive	836	831	39	11	194	804	2,715
Outside NYC	Otsego	Total	11,957	14,959	622	166	1,824	10,192	39,720
Outside NYC	Putnam	Active	22,449	24,361	1,713	252	3,054	20,696	72,525
Outside NYC	Putnam	Inactive	1,929	2,055	150	9	306	1,721	6,170
Outside NYC	Putnam	Total	24,378	26,416	1,863	261	3,360	22,417	78,695
Outside NYC	Rensselaer	Active	34,263	27,247	4,572	1,942	5,937	34,747	108,708
Outside NYC	Rensselaer	Inactive	2,669	1,280	143	112	446	2,136	6,786
Outside NYC	Rensselaer	Total	36,932	28,527	4,715	2,054	6,383	36,883	115,494
Outside NYC	Rockland	Active	93,934	52,077	4,559	1,062	6,140	54,420	212,192
Outside NYC	Rockland	Inactive	7,259	3,903	276	62	709	4,632	16,841
Outside NYC	Rockland	Total	101,193	55,980	4,835	1,124	6,849	59,052	229,033
Outside NYC	Saratoga	Active	53,246	63,973	3,339	609	7,603	52,433	181,203
Outside NYC	Saratoga	Inactive	3,540	3,913	173	38	705	3,369	11,738

Outside NYC	Saratoga	Total	56,786	67,886	3,512	647	8,308	55,802	192,941
Outside NYC	Schenectady	Active	40,467	23,978	3,264	849	3,862	30,533	102,953
Outside NYC	Schenectady	Inactive	2,830	1,362	135	60	332	2,198	6,917
Outside NYC	Schenectady	Total	43,297	25,340	3,399	909	4,194	32,731	109,870
Outside NYC	Schoharie	Active	5,043	8,437	577	112	1,044	5,588	20,801
Outside NYC	Schoharie	Inactive	269	388	41	11	81	351	1,141
Outside NYC	Schoharie	Total	5,312	8,825	618	123	1,125	5,939	21,942
Outside NYC	Schuyler	Active	3,371	5,421	248	61	576	3,124	12,801
Outside NYC	Schuyler	Inactive	197	252	16	3	43	197	708
Outside NYC	Schuyler	Total	3,568	5,673	264	64	619	3,321	13,509
Outside NYC	Seneca	Active	5,958	8,240	430	113	886	5,277	20,904
Outside NYC	Seneca	Inactive	254	283	24	4	48	282	895
Outside NYC	Seneca	Total	6,212	8,523	454	117	934	5,559	21,799
Outside NYC	St. Lawrence	Active	19,747	23,127	1,126	261	3,144	15,010	62,415
Outside NYC	St. Lawrence	Inactive	1,125	969	52	20	198	1,104	3,468
Outside NYC	St. Lawrence	Total	20,872	24,096	1,178	281	3,342	16,114	65,883
Outside NYC	Steuben	Active	14,002	30,718	1,163	281	2,212	14,195	62,571
Outside NYC	Steuben	Inactive	789	1,199	37	4	162	762	2,953
Outside NYC	Steuben	Total	14,791	31,917	1,200	285	2,374	14,957	65,524
Outside NYC	Suffolk	Active	363,613	339,375	20,637	4,081	33,557	325,211	1,086,474
Outside NYC	Suffolk	Inactive	21,439	20,496	1,361	237	2,265	19,267	65,065
Outside NYC	Suffolk	Total	385,052	359,871	21,998	4,318	35,822	344,478	1,151,539
Outside NYC	Sullivan	Active	17,730	16,500	1,251	284	1,670	13,396	50,831
Outside NYC	Sullivan	Inactive	2,085	1,522	125	33	283	1,719	5,767
Outside NYC	Sullivan	Total	19,815	18,022	1,376	317	1,953	15,115	56,598
Outside NYC	Tioga	Active	8,138	14,725	556	118	1,519	7,856	32,912
Outside NYC	Tioga	Inactive	521	978	33	10	160	654	2,356
Outside NYC	Tioga	Total	8,659	15,703	589	128	1,679	8,510	35,268
Outside NYC	Tompkins	Active	33,188	10,434	440	400	1,866	14,524	60,852
Outside NYC	Tompkins	Inactive	4,883	1,113	41	43	264	2,348	8,692
Outside NYC	Tompkins	Total	38,071	11,547	481	443	2,130	16,872	69,544

Outside NYC	Ulster	Active	55,032	29,341	2,503	894	4,617	37,914	130,301	
Outside NYC	Ulster	Inactive	4,072	2,205	163	69	503	3,118	10,130	
Outside NYC	Ulster	Total	59,104	31,546	2,666	963	5,120	41,032	140,431	
Outside NYC	Warren	Active	12,900	19,578	799	160	2,255	11,895	47,587	
Outside NYC	Warren	Inactive	816	1,161	51	15	220	955	3,218	
Outside NYC	Warren	Total	13,716	20,739	850	175	2,475	12,850	50,805	
Outside NYC	Washington	Active	9,459	16,534	792	190	1,904	10,945	39,824	
Outside NYC	Washington	Inactive	329	426	25	7	76	360	1,223	
Outside NYC	Washington	Total	9,788	16,960	817	197	1,980	11,305	41,047	
Outside NYC	Wayne	Active	13,991	24,993	1,696	288	2,371	17,071	60,410	
Outside NYC	Wayne	Inactive	562	695	77	4	140	761	2,239	
Outside NYC	Wayne	Total	14,553	25,688	1,773	292	2,511	17,832	62,649	
Outside NYC	Westchester	Active	320,789	124,305	6,971	1,819	17,271	168,509	639,664	
Outside NYC	Westchester	Inactive	30,858	11,849	670	180	2,204	16,534	62,295	
Outside NYC	Westchester	Total	351,647	136,154	7,641	1,999	19,475	185,043	701,959	
Outside NYC	Wyoming	Active	4,832	12,558	664	94	862	6,446	25,456	
Outside NYC	Wyoming	Inactive	188	292	18	6	61	254	819	
Outside NYC	Wyoming	Total	5,020	12,850	682	100	923	6,700	26,275	
Outside NYC	Yates	Active	3,301	6,531	277	54	627	3,350	14,140	
Outside NYC	Yates	Inactive	183	282	8	3	45	211	732	
Outside NYC	Yates	Total	3,484	6,813	285	57	672	3,561	14,872	
Outside NYC	Grand Total		Active	2,831,782	2,307,988	139,477	35,143	271,036	2,071,389	7,656,815
Outside NYC	Grand Total		Inactive	219,141	151,302	8,648	2,430	25,581	157,994	565,096
Outside NYC	Grand Total		Total	3,050,923	2,459,290	148,125	37,573	296,617	2,229,383	8,221,911
Within NYC	Bronx	Active	514,591	50,442	3,208	3,189	10,777	140,194	722,401	
Within NYC	Bronx	Inactive	59,764	5,651	412	457	1,981	17,830	86,095	
Within NYC	Bronx	Total	574,355	56,093	3,620	3,646	12,758	158,024	808,496	
Within NYC	Kings	Active	1,024,897	138,412	4,645	8,139	21,451	296,112	1,493,656	
Within NYC	Kings	Inactive	128,400	14,270	527	763	4,213	36,956	185,129	

Within NYC	Kings	Total	1,153,297	152,682	5,172	8,902	25,664	333,068	1,678,785
Within NYC	New York	Active	699,748	75,531	1,960	3,124	15,511	202,257	998,131
Within NYC	New York	Inactive	105,448	18,498	374	357	5,407	41,098	171,182
Within NYC	New York	Total	805,196	94,029	2,334	3,481	20,918	243,355	1,169,313
Within NYC	Queens	Active	754,840	148,859	5,373	4,556	21,471	307,169	1,242,268
Within NYC	Queens	Inactive	68,604	12,152	515	369	2,879	27,552	112,071
Within NYC	Queens	Total	823,444	161,011	5,888	4,925	24,350	334,721	1,354,339
Within NYC	Richmond	Active	120,709	100,752	4,134	1,128	7,864	78,744	313,331
Within NYC	Richmond	Inactive	12,413	9,077	416	124	1,092	7,411	30,533
Within NYC	Richmond	Total	133,122	109,829	4,550	1,252	8,956	86,155	343,864
Within NYC Total		Active	3,114,785	513,996	19,320	20,136	77,074	1,024,476	4,769,787
Within NYC Total		Inactive	374,629	59,648	2,244	2,070	15,572	130,847	585,010
Within NYC Total		Total	3,489,414	573,644	21,564	22,206	92,646	1,155,323	5,354,797
Statewide Total		Active	5,946,567	2,821,984	158,797	55,279	348,110	3,095,865	12,426,602
Statewide Total		Inactive	593,770	210,950	10,892	4,500	41,153	288,841	1,150,106
Statewide Total		Total	6,540,337	3,032,934	169,689	59,779	389,263	3,384,706	13,576,708