

PROSKAUER ROSE LLP

1585 Broadway
New York, NY 10036-8290
Telephone 212.969.3000
Fax 212.969.2900

LOS ANGELES
WASHINGTON
BOSTON
BOCA RATON
NEWARK
NEW ORLEANS
PARIS

John Siegal
Senior Counsel

Direct Dial 212.969.3342
jsiegal@proskauer.com

September 6, 2005

BY FAX

Hon. Frederick A. O. Schwarz, Jr.
Chair
New York City Campaign Finance Board
40 Rector Street
New York, NY 10006

2005 SEP -6 A 10:24
CFB RECEIVED

Re: Exempt Expenditure Claims By Miller For New York

Dear Chairman Schwarz:

I write on behalf of Anthony Weiner for New York in response to the CFB's request for comments, dated September 2, 2005, concerning the belated Advisory Opinion request by Miller For New York and to outline the information that we believe warrants a determination that the Miller campaign has abused the exempt expenditure rules, resulting in a violation of the spending cap in this primary election. For the reasons set forth below, it is apparent even in advance of the audit that the CFB will conduct that Miller for New York has improperly claimed voter contact and field operations activities as exempt expenditures that should be immediately reallocated in order to protect the spending cap in the current Mayoral primary.

STATEMENT OF FACTS

If there had been any previous doubt that the Miller campaign is violating the spending cap through its exempt expenditures claims, that has been put to rest by the advisory opinion request. The Miller campaign has now admitted claiming the following nonexempt activities as exempt compliance costs:

- Using nonexempt campaign literature "to acquaint each registered voter with the candidate";
- Asking voters "whether he/she had a preference in the Mayoral race";

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- Using this "information regarding voter preference" to target; and
- Stuffing campaign literature under doors.

None of these activities is required to comply with the Election Law, and none is an exempt expenditure under well-established, unambiguous Campaign Finance Board precedents, as shown in the Legal Analysis below.

What the Miller advisory opinion request describes is not Election Law compliance but the essence and entirety of the Miller campaign's paid political field operation. Field operations are a standard practice in New York City campaigns. Campaigns typically organize field operations to conduct voter identification efforts to locate voters who prefer their candidate or their candidate's issue positions, and then use that information to target field and get out the vote ("GOTV") efforts up through election day. There is no difference between what the Miller advisory opinion request describes and the field operations that the CFB has seen in the five mayoral elections conducted under the Campaign Finance Act in connection with which campaigns have properly disclosed making large, non-exempt expenditures for personnel, the support of political organizations and other operational infrastructure. During this sixteen years of regulatory activity, however, no campaign has ever tried to claim that its entire field operation is exempt from the spending cap – until now.

At the CFB debate on August 16, Mr. Miller boasted "we've been building and organizing block by block and neighborhood by neighborhood." Despite this claim of "organizing" a field campaign, to date, the Miller campaign has reported no field operations expenditures but for the exempt petition compliance expenditures. The field organizing and petition operation are obviously one and the same.

Mr. Miller's campaign manager has admitted that the so-called petitioning effort has been used to communicate with targeted voters, telling the New York Times "[w]e've knocked on more than 150,000 doors of *targeted primary voters to get their signatures and introduce them to Gifford*" (emphasis added). Even though the campaign admits that it has been engaged in voter contact and communications with "targeted primary voters," it is nonetheless seeking to exempt 100 percent of the cost of this operation as a petitioning expense, including the costs of petitioning for an ostensible general election ballot line (although Mr. Miller has admitted that he will not run on that line if he is not the Democratic nominee). Indeed, the Miller campaign's "Smaller Class Size" general election ballot drive was nothing but a gambit to extend his exempt expenditures claim into a second period of purported petitioning activity. Although its Treasurer, Marshall Miller, now claims in the Advisory Opinion request that people were not employed to distribute literature or to leaflet, he admits that they did so and his Campaign Manager and candidate have previously boasted of the *political* importance of this field operation. The CFB should, respectfully, ignore the Miller Treasurer's declarations about the purpose or intent of the field efforts, and it should instead apply the letter of the law by

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permitting as exempt expenditures only the cost of activities that are required to comply with the Election Law.

The information that the Miller campaign has gathered through this field operation is not necessary or even useful for complying with the petitioning requirements of the Election Law, but is very valuable for political field and GOTV operations.

- In the advisory opinion request, the Miller campaign admits asking voters for their candidate preferences. This information is not required or even useful for complying with the petition requirements of the Election Law.
- During petitioning for a general election ballot line, the Miller campaign reportedly asked people if they are registered Democrats. This information is of use only for the primary election to identify potential primary voters, and is not required to comply with the Election Law to qualify for a general election ballot line.
- Miller "petitioners" have also reportedly polled signatories (of both the primary and general election petitions) on their issue concerns, listing issues such as small class size, the Second Avenue subway and the West Side Stadium, and asking voters to rank their relative importance. This information is not required to comply with the Election Law. (The Weiner campaign learned of this aspect of the Miller operation from a woman who attended a Miller petitioning training session but who then declined to work for the Miller campaign.) Presumably, the Miller campaign has collected this information for use in identifying and targeting voters for its GOTV operations.

The foregoing information provides the Miller campaign with what is known as a "hard voter ID" – a voter list that has been prescreened for voters who are likely to vote for a candidate, or can be persuaded to do so, and with information about what issues are best used to induce the voter to vote. This information is an incredibly valuable asset in a political campaign, and for the Miller campaign to admit that it has been developing a hard voter ID data base and claiming that the costs of doing so are exempt from the spending cap is a shocking acknowledgment of its on-going violation of the Campaign Finance Act.

For the Miller campaign to claim (at 6) that its hard voter ID data base was used "to generate petitioning volunteers and to target petitioning efforts" strains credulity. The campaign collected hundreds of thousands of petition signatures, using a few hundred petitioners; the voter data was not used to generate petitioners and signatures, just the opposite, the petition operation was used to generate the voter data. Indeed, the Miller campaign admits the valuable nature of the voter data that it continues to possess, claiming that while it maintains

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the information, it "has been quarantined and will not be used in post-petitioning efforts." If this data is so valuable for GOTV efforts that it now has to be "quarantined," then the costs of generating it in the first place cannot possibly be exempt expenditures.

Indeed, the very suggestion that this data has been "quarantined" is suspect when the Miller campaign's spokesman is quoted in this week's Sunday New York Times as follows: "You've got to know who your voters are on Primary Day, and we believe we've built the best operation to identify them and move them," said Reggie Johnson, a spokesman for the Miller campaign. "Turnout is about people and cars and manpower, and tapping them on the shoulder to remind them to vote. We will be tapping." Unfortunately for the public interest and the integrity of the City's model campaign finance program, unless corrected, the bulk of the costs of this "operation" will be exempted from the spending cap due to the Miller campaign's machinations.

The Miller campaign's claim that its voter data base has been "quarantined" needs to be immediately and thoroughly investigated by the CFB to determine, among many other issues: Where is it maintained? What information does it contain? Who has access to it? For what purpose(s) has it been used? Have mailings been sent by the Miller campaign or the City Council to individuals using information in the data base? Does it contain any email addresses or telephone numbers? If so, for what purposes have they been used? When and why did the Miller campaign decide to "quarantine" this information? If it is not being used for this election, why is it being maintained? Has it been sold or loaned to any other campaigns or organizations?

We note that the Miller campaign's exempt expenditures claims extend even to the operational infrastructure of the campaign, including claiming \$40,000 in computer expenses as petition related. There is little to nothing computer related about complying with New York Election Law in gathering and filing handwritten petitions. These computers are doubtlessly now filled with voter information that has been gathered and will be used for the GOTV operation.

The Miller campaign's "petition operation" has been coordinated by Karen Hicks, a professional GOTV operative with no prior experience in New York Election Law compliance. On information and belief, Ms. Hicks' job is in fact to coordinate the Miller GOTV and election day operations, to collect voter data, target voters and get them to the polls on election day. These activities are not exempt from the spending cap, yet 100 percent of Ms. Hicks' compensation – and 100 percent of the entire costs of her operation – have been claimed as exempt expenditures.

The Board should be aware of Ms. Hicks's distinguished professional background. Ms. Hicks served as National Field Director for the Democratic National Committee during the 2004 national elections, as Gov. Howard Dean's New Hampshire State Director for the 2004 Presidential primary where the campaign manager credited her as "[t]he

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reason [Dean] came in second in New Hampshire instead of falling out of the sky was because of the organization she put together (New York Times, May 25, 2005), and as an advisor to the British Labor Party where one member of Parliament said "Get out the vote' is really an issue in this campaign [and] Karen is my ace in the hole."

On information and belief, the techniques employed by Ms. Hicks in those elections are no different than the techniques used under her direction by the Miller campaign. The fact that the 200 plus employees directed by Ms. Hicks in a carefully crafted attempt to undermine New York City's reformed campaign finance system, also collected petition signatures in the course of conducting the voter contact and identification procedures for which she has become renown does not magically transform her field operation into a 100 percent exempt compliance cost for the Miller campaign.

In sum, it is clear that the Miller campaign has organized an extensive field operation and attempted to pass it off improperly as a petition operation designed solely for Election Law compliance when it clearly was not. This is not a record keeping issue; it is an issue of substantive compliance with the Act. The fact that the campaign claims it has boilerplate statements from its field workers claiming that they have provided "[n]o services unrelated to petitioning" is of no legal significance when the campaign has admitted using these people for purposes that are not required for petitioning under the Election Law and, as shown above, there is considerable reason to believe that the violations have been even more extensive than admitted to date.

LEGAL ANALYSIS

1. THERE IS NO LEGAL AUTHORITY SUPPORTING THE MILLER CAMPAIGN'S POSITION THAT IT CAN BLEND FIELD OPERATIONS WITH PETITIONING ACTIVITIES AND EXEMPT THE ENTIRE COST

The law governing what expenditures are exempt from the spending cap for petitioning activities has long been clear, complete and unambiguous: The Campaign Finance Act provides that only "compliance costs" are exempt from the Program's expenditure limits and, with respect to petitioning, only "[e]xpenditures made *for the purpose of complying with the provisions of . . . the election law . . .* shall not be limited by the expenditure limitation . . .". Administrative Code Section 3-706(4) (emphasis added). The standard set forth in the Act could not be any more clear; only costs that are required to comply with the election law are exempt from the spending cap. See Advisory Opinion 1996-1 ("The cost of circulating and filing designating and nominating petitions *as required by State Election Law* is an exempt compliance cost.").

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In its Advisory Opinion request (at 6), the Miller campaign describes engaging in activities it claims as exempt costs, including literature distribution and gathering "information regarding voter preference," that are not required "for the purpose of complying with the provisions of the election law." There is no authority under the Election Law, the Campaign Finance Act or the Rules and Advisory Opinions promulgated thereunder that affords even a colorable basis for claiming that the distribution of literature or the collection of voter preference information is exempt from the spending cap. Indeed, the Miller campaign acknowledges (at 5) knowing that the cost of literature used in connection with petitioning is not exempt, so it certainly had reason to know that the cost of distributing such literature is never exempt either. Amidst its rhetoric in its advisory opinion request regarding retroactivity and some supposed new standard, the Miller campaign has not even attempted to justify its claims under the long-standing, unambiguous legal standard and prior decisions of this Board on point. The Election Law provides the standard, "[t]he burden is on the campaign to show that an expenditure is exempt," AO 1996-1, and the Miller campaign has not even attempted to make a showing that the activities it describes were required "for the purpose of complying with the provisions of . . . the election law." Administrative Code Section 3-704(4).

The CFB has previously emphasized that campaigns are to narrowly construe its rules regarding exempt expenditure claims and that expenses are not to be claimed as exempt from the spending cap absent prior, express authorization by the CFB: "The expenditures described in this advisory opinion as exempt compliance costs are the *only* expenditures that may be claimed as such, except to the extent that Board interpretation may be extended by subsequent advisory opinions." AO 1996-1 (emphasis added).

Despite this clear directive and the complete absence of any authority even arguably permitting any costs of distributing literature and collecting voter preference information, the Miller campaign has incurred and claimed as exempt an unprecedented level of spending as petition compliance costs, including 100 percent of the costs of distributing literature and collecting voter preference data, and has only sought an advisory opinion after the close of all petitioning periods and one week before the primary election after critical stories have appeared in every newspaper in town. But, there has never been any doubt about the law; when the Weiner campaign first learned of the extent of the Miller campaign's exempt expenditure claims, Matt Canter of the Weiner campaign called the Weiner campaign's CFB Candidates Services Unit liaison, Chris Giza, in June and asked if the cost of distributing literature during a petition drive could be claimed as exempt. The CFB representative replied very clearly, as the law requires, that the costs of distributing literature cannot be claimed as exempt. The fact that the Miller campaign did not ask did not give them the right to ignore the rules.

The Miller campaign's claim of a 100 percent exemption for the personnel and facilities costs of its purported petitioning operation violates unambiguous CFB precedents. The CFB explained with great clarity more than nine years ago that "if an expense is incurred for

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both compliance and non-compliance purposes, a portion of the expense may be claimed as exempt, but only if the claim is reasonable and satisfactorily documented." AO 1996-1. Campaigns, and their counsel, have long been on notice that the CFB closely scrutinizes exempt claims and disallows any nonexempt portion that has not been properly allocated. *See e.g.* Final Determination In the Matter of Committee to Elect Letitia James, No. 2003-3. The CFB's willingness to enforce against potential spending cap violations – and to do so even in the last days of a Mayoral primary – has also long been known to practitioners before this Board. *See e.g.* "Finance Ruling Denies Hevesi Matching Cash," New York Times, August 7, 2001, page 1.

Two other arguments advanced in the Miller Advisory Opinion Request also bear addressing, although the fact that they have been advanced demonstrates the weak nature of the Miller campaign's position in this matter.

First, the Miller campaign contends (at 2) without any substantiation whatsoever that rejecting exempt expenditure claims for literature distribution "is at odds with the manner in which political campaign traditionally conduct ballot petitioning activities . . .". Even if it were true that this is a "standard practice" (although the Miller campaign has made no such showing), it would be irrelevant, for the CFB has very clearly ruled that "[c]osts incurred for a standard practice may not be claimed as an exempt compliance cost." AO 1996-1. Again, the Miller campaign has simply ignored the CFB's long-standing, unambiguous requirement that "[I]f an expense is incurred for both compliance and noncompliance purposes [*i.e.*, a "standard practice that is not required by the election law], the campaign must propose a reasonable allocation for what percentage is exempt and the Board will then determine the portion that may be properly claimed as an exempt compliance cost." *Id.* The Miller campaign has simply ignored this clear authority. At any rate, many traditional New York City political practices have come under the watchful eye of this Board, and are now being carefully regulated – that is what campaign finance reform is all about. The argument that "it has always been done this way" is both untrue in this instance, and unpersuasive.

Second, the threat of a First Amendment challenge presented in the Miller advisory opinion request lacks any merit, and it is surprising to see such a threat submitted on behalf of the City's senior legislative official whose legislative body is responsible for enacting the City's successful Campaign Finance Act. The Miller campaign voluntarily chose to participate in the Campaign Finance Program. By doing so, Mr. Miller chose to abide by the CFB's Rules, which entail foregoing the exercise of certain of his First Amendment rights to political expression, in exchange for a large amount of public funding. Now that he has been caught violating those Rules, he cannot object that enforcing them violates his First Amendment rights. The CFB's Rules do contain "a mandatory spending limit," one that applies to the Miller campaign and all other participating campaigns, and the Miller campaign's 11th hour complaint about its enforcement does not present a First Amendment issue, but simply one of lawful compliance with a very clear and specific set of Rules.

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2. THE MILLER CAMPAIGN CONTINUES TO USE PETITION-RELATED MATERIALS EVEN THOUGH PETITIONING HAS CLOSED.

The Miller campaign's claim that its literature distribution effort was 100 percent and solely conducted for Election Law compliance is further undermined by the fact that the campaign continues to use the same ostensibly petition-related literature as part of its political and field efforts even though all petitioning has now closed.

Last week, on August 28, during a candidate appearance at the Chelsea Midtown Democratic Club, Miller campaign Treasurer Marshall Miller distributed the same "petitioning" literature as the Miller campaign has submitted to the CFB with its Advisory Opinion request. A copy of this literature that was obtained at August 28 Chelsea event by the Weiner campaign is enclosed for the Board's review. Of course, it barely mentions petitioning and is, in fact, a standard piece of campaign literature. Gifford Miller himself appears to be distributing the same literature in a picture in yesterday's New York Times that is identified in the caption as having been taken on Saturday, September 3.

The Miller campaign is distributing this literature after the close of petitioning at political clubs and on the streets as an integral part of its voter contact and voter communications efforts, and yet they claim that when they were distributing the exact same literature during the petitioning period it qualifies as an exempt petition activity and not voter contact/communications. There is no lawful basis for this claim. Plainly, the voter contact and communication the Miller campaign was doing during petitioning was no different than the voter contact and communication it is doing now, and the fact that petition signatures were also collected does not change this fact. The 100 percent attribution of all field operations during the petitioning periods as exempt expenditures obviously must be changed in order for the Miller campaign to be in compliance with the Act and to protect the spending cap.

3. THE SCOPE OF THE MILLER EXEMPTION CLAIMS IS UNPRECEDENTED IN THE HISTORY OF THE CITY'S REFORMED CAMPAIGN FINANCE SYSTEM AND, IN CONTEXT, MAKES NO SENSE UNLESS IT WAS DEvised TO DELIVER ANCILLARY BENEFITS BEYOND ELECTION LAW COMPLIANCE.

As the CFB is aware from disclosure statements and recent reports in the Times, Daily News, Newsday, Post, Village Voice and New York Sun, the Miller campaign is claiming an unprecedented amount of spending as exempt from the spending cap as petitioning expenses. Through August 29, the Miller campaign claims \$1,455,977 as exempt expenditures – with \$1,015,178 that was claimed for petitioning. The extent of this claim is shocking: 7.5 percent is the presumptively acceptable level of campaign spending attributable to compliance, Administrative Code Section 3-706(4), yet the Miller campaign has claimed over 65 percent of its expenditures as exempt compliance costs on a recent disclosure statement that covered a

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period after primary petitions had been filed, and the Miller campaign has claimed that 259 of its 271 paid personnel were devoted 100 percent to exempt compliance activities. The scope alone shows that this is an abuse which, if uncorrected, will tilt the electoral playing field in exactly the manner the Campaign Finance Act was enacted to prevent. It requires immediate regulatory action and if such action requires the Miller campaign to scale back on its election week advertising in order to remain in compliance with the spending cap, then that is a necessary and proper outcome of this proceeding.

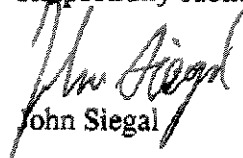
The people who run and advise Miller for New York are smart, experienced political operatives who would not spend approximately one million dollars solely for the purpose of obtaining petition signatures. It can be done effectively and successfully for far less, as the CFB is well aware, because no campaign in the 16 year history of the Campaign Finance Program has spent anywhere near one million dollars on petitioning. If spending this kind of money on petitioning alone made political sense, some other campaign would have done it during that past five election cycles, but none has.

The Miller campaign is not drastically overpaying for petitioning; it is obtaining benefits – political benefits that are an integral part of its primary election campaign — above and beyond the petition requirements of New York Election Law that are not exempt from the spending cap under any CFB precedent.

The Miller campaign is free to spend its resources in this manner. What it cannot do under the governing law is exempt 100 percent of its field operation and GOTV effort from the spending cap, even if some portion of these expenditures were genuinely incurred in collecting petition signatures. Simply put, the 100 percent exemption claim is incredible; it should be investigated and reallocated on a proportionate basis to reflect the true purpose(s) of these purportedly exempt expenditures.

We urge the Board to act swiftly so that the Miller campaign's carefully-planned \$1 million end-run around the primary spending caps may be addressed in time to level the playing field before the primary, and to send a clear message to future candidates that abuses like this will not await post-election remedies.

Respectfully submitted,


John Siegal

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Enclosure

cc: Members of the Campaign Finance Board
Executive Director Nicole Gordon



They said he was too young to lead the City Council.
Gifford Miller proved them wrong.

He took charge, stood up to Mayor Bloomberg and fought for Democratic priorities—protecting schools, seniors, libraries and healthcare from the Mayor's slashing cuts. Gifford Miller has always been impatient about getting results. Now—at 35—his drive, energy and new ideas may be just what New York City needs.

GIFFORD **milller**
MAYOR

Help Gifford Help New York

How will Gifford get on the ballot?

- NY law requires candidates for Mayor to gather signatures
- Signatures must be from registered NYC Democrats
- We will build teams in every neighborhood to gather signatures

How can you help?

- Sign the petition to place Gifford on the ballot
- Join our grassroots team—Sign for Change—and gather signatures in your neighborhood



Gifford with his wife, Pamela, and sons Addison and Marshall

About Gifford

Gifford Miller has called New York City home his entire life. He loves New York, the people, the City's energy—and he and his wife, Pamela, would never think about raising their two sons anywhere else. Gifford was first elected to the City Council in 1996. And in 2002—at age 32—he was the unanimous choice of his colleagues to become Speaker. Now he's running for Mayor to continue getting results for the City he loves, and because he believes New York's best days are still ahead of us.

“Several Democrats are weighing the possibility [of running for Mayor]...but so far only one, Council Speaker Gifford Miller, is seriously engaged.”

— *The New York Times* (12/12/04)

A New Direction for New York City's Future.

Gifford Miller is tired of excuses—and refuses to settle for a City that he knows can be much better. He has an agenda for change that will take New York in a new direction.

Getting Our Fair Share: Each year, New York City taxpayers send \$24 billion more to Washington and Albany than we get back. Schools, healthcare, affordable housing—they're all shortchanged. As Mayor, Gifford Miller will do something this Mayor hasn't. He'll stand up to the Republican leadership in Washington and Albany and demand our fair share. Because until we start getting it, we'll never be able to solve the City's problems and invest in the future.

No to the West Side Stadium: Gifford Miller knows there are better uses and more pressing needs for our tax dollars—from reducing class sizes to repairing our subways—than a stadium on Manhattan's West Side. That's why he's taken more than just a strong stand against the stadium. He's taken action to stop it—blocking Mayor Bloomberg's plan to use \$300 million in public funds for the project.

Better Schools for Our Kids: It's clear what our kids need: smaller classes, more quality teachers, safer schools and stronger afterschool programs. No part of Miller's agenda will be more important than these investments in our children's future.

Fixing Our Subways: Miller has a specific plan to fix the subways, repair and modernize existing lines, and pay for needed expansion—like the 2nd Ave. Subway.

Strengthening Homeland Security: Miller will create a new city Homeland Security Office to focus on protecting New Yorkers 24/7. And he'll make sure first responders get the resources they need.

Growing the City's Economy: Miller has a plan to bring high-tech jobs to the City—including tax credits for emerging growth sectors and a stronger focus on training. As Mayor, he'll continue to advance policies, like the Earned Income Tax Credit, that help lift families out of poverty and into prosperity.

Results for New York.

As Speaker of the City Council, Gifford Miller has been an innovator, taking strong stands on progressive issues and getting results. He stood up to Mayor Bloomberg to protect New Yorkers and Democratic priorities in the City budget—restoring hundreds of millions for healthcare, child care, college scholarships, programs for seniors, and HIV/AIDS prevention. And he delivered on a number of important firsts: creating New York City's first Earned Income Tax Credit to help lift thousands of families out of poverty...protecting children from the dangers of lead paint...requiring hospitals to provide emergency contraception to sexual assault victims...bringing a living wage to 50,000 workers. On issue after issue, Gifford Miller has already proven he can get results. Now he's ready to prove it again...as Mayor.

“We can't afford to waste tax dollars on a stadium when our schools are overcrowded and our subways are falling apart. We need a Mayor with different priorities—and one who won't shy away from standing up to the Republicans in Washington and Albany to get New York City our fair share.”
—Gifford Miller

GIFFORD **mill**er
MAYOR

Paid for by Miller for New York

DEMOCRATIC PRIMARY SEPTEMBER 13TH