



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

November 12, 2014

MICHELE HYNDMAN, TREASURER
VIRGIN ISLANDERS FOR PLASKETT
PO BOX 26502
CHRISTIANSTED, VI 00824

Response Due Date
12/17/2014

IDENTIFICATION NUMBER: C00528182

REFERENCE: JULY QUARTERLY REPORT (04/01/2014 - 06/30/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following **8** item(s):

1. Schedule A of your report discloses one or more contributions that appear to be from a corporation(s) and/or labor organization(s) (see attached). 52 U.S.C. § 30118(a) (formerly 2 U.S.C. § 441b(a)) and 11 CFR § 103.3(b) prohibit the receipt of contributions from corporations and labor organizations unless made from separate segregated funds established by the corporations and labor organizations.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you must amend your original report with clarifying information.

If you have received prohibited contributions, you must make a refund within 30 days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(1) and (2))

If you have not already done so, please inform the Commission of your corrective action immediately in writing and provide a photocopy of any refund checks. Refunds must be reported on a Schedule B supporting Line 20(a) of the report covering the period in which the refund is made. (11 CFR § 104.8(d)(4))

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, your prompt action to refund the

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prohibited amount will be taken into consideration.

2. Schedule A (see attached) discloses a contribution(s) from an individual(s) who has a mailing address outside of the United States of America. Please be advised that 52 U.S.C. § 30121(a) (formerly 2 U.S.C. §441e(a)) and 11 CFR §110.20 prohibit foreign nationals from making contributions in connection with any election for political office or in connection with any primary election, convention, or caucus held to select candidates for any political office.

If the apparently prohibited contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If your committee follows the safe harbor guidelines outlined under 11 CFR §110.20(a)(7) for all contributions received from a foreign address to ensure that the sources of these contributions are not foreign nationals, please provide a detailed description of your procedures. These procedures must be used in all cases where a contributor or donor uses a foreign passport or passport number for identification purposes, provides a foreign address, makes a contribution or donation by means of a check or other written instrument drawn on a foreign bank or by wire transfer from a foreign bank, or resides abroad. A committee is deemed to have conducted a reasonable inquiry into the contributor or donor's nationality if you seek and obtain copies of current and valid U.S. passport papers for U.S. citizens. No person may rely on this safe harbor if he or she has actual knowledge that the source of the funds solicited, accepted, or received is a foreign national.

If you have received a contribution from a foreign national, you must refund the impermissible contribution to the donor in accordance with 11 CFR §103.3(b). Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the refund. In addition, any refunds should be disclosed on Schedule B supporting Line 20(a) of the report during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution(s), prompt action on your part to refund or provide clarifying information concerning these contributions will be taken into consideration.

3. Schedule B, supporting Line 17 discloses payments to the candidate

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following purpose: "Jonathan Small Loan Repay." If the Committee received a loan from Jonathan Small, please itemize it on Schedule A supporting Line 13(b) of the Detailed Summary Page. Each person who makes a loan to your committee, or to the candidate acting as an agent of the committee, must be itemized on Schedule A and Schedule C. The itemization on Schedule A must include the person's full name, mailing address and zip code, along with the name of his/her employer, his/her occupation, the date of the contribution/loan and the election cycle-to-date amount of contributions made by the person. Schedule C must include the date the loan was made and all other terms of the loan. (2 U.S.C. §434(b)(3)(E) and 11 CFR § 104.3(a)(4)(iv))

Please amend your report to disclose the loan in the above format or clarify the nature of this transaction.

4. Commission Regulations require that a committee discloses the identification of all individuals who contribute in excess of \$200 in an election cycle. (11 CFR § 104.3(a)(4)(i)) Identification for an individual is defined as the full name (initials for first or last name are not acceptable), complete mailing address, occupation, and name of employer. (11 CFR § 100.12) Your report discloses contributions from individuals for which the identification is not complete.

The following employer and occupation entries appear on your report and are not considered acceptable: "Blank/Blank," "Blank/Contractor," "Blank/Money Manager," "N/A / Blank," and "Self Employed/Business Owner."

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR § 104.7(b)(1)) See 11 CFR § 104.7(b)(1)(B) for examples of acceptable statements regarding the requirements of federal law.

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of

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the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The requests must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you should either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR § 104.7(b)(4))

Please amend your report to provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

5. On Schedule B supporting Line 17 of your report, you have itemized disbursements for which you have failed to include the address. Please amend your report to include the missing information. (11 CFR § 104.3(b)(4))

6. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 17 of your report to clarify the following description(s): "Consultant." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(4)(i)(A).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register is available on the FEC website at www.fec.gov/law/policy/purposeofdisbursement/inadequate_purpose_list_3507.pdf. A non-exhaustive list of acceptable purposes is also available on the FEC website at <http://www.fec.gov/rad/pacs/documents/ExamplesofAdequatePurposes.pdf>.

7. Schedule B of your report discloses reimbursements to individuals for the attached disbursement(s). Please be advised that when itemizing reimbursements to individuals for goods or services, if the payment to the original vendor aggregates in excess of \$200 in an election cycle, a memo entry

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including the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information on Schedule B and clearly identify each memo entry supporting a reimbursement. If itemization is not necessary, you must indicate so in an amendment to this report. (11 CFR §§ 104.3(b)(4)(i) and 104.9, and Advisory Opinions 1992-1 and 1996-20, footnote 3)

8. Schedule B of your report discloses reimbursements to individuals for the following travel-related disbursement(s): "Reimburse Cape Air," and "JFK/MIA Plane Tickets." When the reimbursement amount to individuals for travel and subsistence advances exceeds \$500, the payments by staff to any one vendor that make up the reimbursement may have to be itemized. For example, if the related payments to any one vendor aggregate in excess of \$200 for the election cycle, the staff advance payment to the vendor must also be itemized in a memo entry for that reimbursement. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount, and detailed purpose of the advance. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must indicate so in an amendment to this report. Please amend your report to include the missing or clarifying information. See Advisory Opinion 1996-20 for additional clarification. (11 CFR § 104.9)

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended.

If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1132.

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Sincerely,

A handwritten signature in black ink, appearing to read "Chris Jones". The signature is fluid and cursive, with a long horizontal stroke at the end.

Chris Jones
Campaign Finance Analyst
Reports Analysis Division

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**Incorrectly Reported Disbursements
Virgin Islanders for Plaskett (C00528182)**

Inadequate Purposes

Name	Date	Amount	Purpose
Garrett, Samuel	5/16/2014	\$600.00	Consultant

Reimbursements to Individuals for Non-Travel Purposes

Name	Date	Amount	Purpose
Plaskett, Stacey	5/6/2014	\$250.00	Bar for quadrille
Picou, Jean	5/28/2014	\$590.60	Baseball Caps
Garcia, Delmin	5/29/2014	\$360.00	cellphones for phone bank
Garcia, Delmin	4/29/2014	\$645.00	Chamelot Database
Plaskett, Stacey	4/17/2014	\$70.00	Easter Eggs
Picou, Jean	4/24/2014	\$244.64	Freight rally towels
Picou, Jean	5/28/2014	\$520.00	Large car magnets
Plaskett, Stacey	4/16/2014	\$250.00	Mardi Gras
Plaskett, Stacey	5/7/2014	\$1,800.00	Newspaper ad/Quadrille food
Plaskett, Stacey	6/12/2014	\$150.00	Office and Cleaning Supplies
Garcia, Delmin	6/3/2014	\$135.45	Office Max printing
Plaskett, Stacey	6/25/2014	\$220.00	Radio ad
Plaskett, Stacey	4/22/2014	\$1,630.00	Radio Ads
Plaskett, Stacey	5/16/2014	\$900.00	Radio Ads
Plaskett, Stacey	5/23/2014	\$1,100.00	radio ads
Plaskett, Stacey	6/5/2014	\$800.00	Radio Ads
Plaskett, Stacey	5/28/2014	\$3,800.00	Radio ads (2 weeks)
Picou, Jean	4/1/2014	\$2,309.50	Rally towels & Road signs
Garcia, Delmin	6/27/2014	\$500.00	Reimburse Camelot database
Garcia, Delmin	6/6/2014	\$520.00	Reimburse for bank overdraft
Benjamin, Lawrence	4/29/2014	\$300.00	Sign on Boat STT
Plaskett, Stacey	5/2/2014	\$325.00	SP Cake/HQ Liquor
Plaskett, Stacey	5/20/2014	\$600.00	Stacey NY expenses
Plaskett, Stacey	5/6/2014	\$1,100.00	Stacey Plaskett B-day Radio Ads
Plaskett, Stacey	4/23/2014	\$900.00	STT Carnival expenses
Rogers-Clarke, Monique	4/28/2014	\$500.00	Tea Party in STJ
Picou, Jean	5/1/2014	\$2,506.00	T-Shirts
Garcia, Delmin	4/11/2014	\$198.00	Web template reimbursement