



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 8, 2014

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

Response Due Date
05/13/2014

IDENTIFICATION NUMBER: C00528182

REFERENCE: AMENDED OCTOBER QUARTERLY REPORT (07/01/2013 - 09/30/2013),
RECEIVED 12/30/2013

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. There should not be a gap in the coverage dates of your report. You must file the 2013 April Quarterly Report and 2013 July Quarterly Report to include the activity from 1/1/13 through 6/30/13. (2 U.S.C. § 434(b) and 11 CFR § 104.3)
2. The totals listed on Line(s) 6(a), 6(c), 7(a), 7(c), 11(a)(iii), 11(e), 16, 17, and 22, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. This appears to be incorrect due to the non-filing of the 2013 April Quarterly Report and the 2013 July Quarterly Report. Note that Column B should reflect the election cycle-to-date totals (11/7/12 through 11/4/14). (2 U.S.C. § 434(b) and 11 CFR § 104.3)
3. 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 attached employer and occupation entries appear on your report and are not

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considered acceptable.

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 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.

4. On Schedule B supporting Lines 17 and 21 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))

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5. 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 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)

6. Schedule B of your report discloses reimbursements to individuals for the following travel-related disbursement(s): "Airline Tickets - ATL," "Car Rental (DC/NYC)," "Reimbursement - DC/NYC Credit Card," "Reimbursement - Trip Expenses," and "Travel to NY and DC." 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)

7. Schedule B of your report discloses disbursements with the purpose "Cash," "Cash for School Supplies," and "Per Diem (DC/NYC)," that appear to be made from petty cash. Please be advised that cash disbursements to any person or vendor for any single purchase or transaction may not exceed \$100. If payments to the original vendor exceed \$200 in an election cycle, a memo entry including the name of the original vendor as well as address, date, amount, and purpose of the original purchase must be provided. Please amend your report to include the missing information or provide clarifying information if memo items are not required. (2 U.S.C. §432(h)(2) and 11 CFR § 102.11)

8. Your amended report discloses a decrease disbursements totaling \$33,509.90 on Line(s) 17 of the Detailed Summary Page from those disclosed on your original report. Please amend your report(s) or provide an explanation for the

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apparent discrepancy. (11 CFR § 104.3)

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.

Sincerely,



Chris Jones
Campaign Finance Analyst
Reports Analysis Division

**Inadequate Employer/Occupation Entries
Virgin Islanders for Plaskett (C00528182)**

Employer	Occupation
Blank	Administrator
Blank	Attorney
Blank	Blank
Blank	Consultant
Blank	Developer
Blank	Doctor
Blank	Investment Banker
Blank	Investor
Blank	Money Manager
Blank	Veterinarian
Self Employed	Blank
Self Employed	Business Owner

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

Reimbursements to Individuals for Non-Travel Purposes

Name	Date	Amount	Purpose
Garcia, Delmin	9/17/2013	\$4,200.00	ATL Expense Events
Plaskett, Stacey	7/10/2013	\$200.00	Candidate Meet and Greet
Garcia, Delmin	8/3/2013	\$350.00	Cash for School Supplies
Garcia, Delmin	8/29/2013	\$2,100.00	DC/NYC Vendors
George, Jermaine	9/11/2013	\$1,000.00	Kinko/Kinis -Food
Garcia, Delmin	7/5/2013	\$650.00	Office Equipment/Supplies
Garcia, Delmin	7/31/2013	\$300.00	Office Suplies
Garcia, Delmin	9/24/2013	\$300.00	Paint Office Supply
Garcia, Delmin	8/20/2013	\$291.00	Reimbursement - Cost-U-Less, Office Max
Garcia, Delmin	9/11/2013	\$2,675.00	Reimbursement - DC/NYC Credit Card
Garcia, Delmin	8/5/2013	\$700.00	Reimbursement for back to school supplies