



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 20, 2016

CHARLETTE MIMIASIE, TREASURER
WRIGHT 2016
193 MALCOLM X BLVD SUITE 1
NEW YORK, NY 10026

Response Due Date
10/25/2016

IDENTIFICATION NUMBER: C00579433

REFERENCE: JULY QUARTERLY REPORT (06/09/2016 - 06/30/2016)

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 6 item(s):

1. Schedule A of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached).

An individual or a political committee other than an authorized committee or qualified multi-candidate committee may not make a contribution(s) to a candidate for federal office in excess of \$2,700 per election. An authorized committee may not make a contribution(s) to a candidate for federal office in excess of \$2,000 per election. A qualified multi-candidate committee and all affiliated committees may not make a contribution(s) to a candidate for federal office in excess of \$5,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (52 U.S.C. § 30116(a) and (f) (formerly 2 U.S.C. § 441a(a) and (f)); 11 CFR § 110.1(b), (e) and (k))

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information. If any contribution you received exceeds the limits, you may have to refund the excessive amount.

Excessive contributions may be retained if, within 60 days of receipt, the excessive portions are properly redesignated or reattributed. Guidelines for

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each option are provided below.

For reattributions, excessive contributions from individuals can be retained if, within 60 days of receipt, the excessive amount is properly reattributed to another person. Please note that reattributions only apply to excessive contributions from individuals. An excessive contribution is considered properly reattributed if (1) the contributors provide the committee with written documentation, signed by each contributor, authorizing a reattribution and indicating the amount of the contribution to be attributed to each contributor; or (2) the committee reattributes by presumption the excessive portion of the contribution if the contribution was made on a written instrument from a joint account and was signed by only one of the account holders. In this case, the treasurer must notify the contributors in writing within 60 days of receiving the contribution that the committee intends to reattribute the excessive portion and must give the contributor an opportunity to request a refund. (11 CFR § 110.1(k)(3)(ii)(B))

For redesignations, the funds can be retained if, within 60 days of receipt, the excessive amount is properly redesignated for a different election. An excessive contribution is considered properly redesignated if (1) the committee obtains signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election; or (2) your committee redesignates by presumption the excessive portion of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. The notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B)) Please note that you cannot presumptively redesignate an excessive contribution from a multi-candidate committee. Also, a contribution can only be redesignated to a previous election to the extent that the contribution does not exceed the committee's net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i))

If the foregoing conditions for reattributions or redesignations are not met within 60 days of receipt of the contribution, the excessive amount must be refunded. See 11 CFR § 103.3(b)(1).

If you have not already done so, please inform the Commission of your

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corrective action immediately in writing and provide photocopies of any refund checks and/or letters reattributing or redesignating the contributions in question. Refunds are reported on Line 20(a), (b), or (c), as applicable, of the Detailed Summary Page and on a supporting Schedule B of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR § 104.8(d)(2), (3) and (4))

Although the Commission may take further legal action concerning the acceptance of excessive contributions, your prompt action to refund, redesignate, and/or reattribute the excessive amount will be taken into consideration.

2. 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 prohibited amount will be taken into consideration.

3. Schedule A of your report discloses one or more contributions that appear to be from a limited liability corporation(s) (LLC) (see attached). 11 C.F.R. §110.1(g) allows the receipt of contributions from LLCs providing the LLC is

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treated as a partnership for tax purposes, and has not elected to be treated as a corporation by the Internal Revenue Service (IRS). Both LLCs that claim corporate status and those that publicly traded would be treated as corporations for FECA purposes.

Please amend your report to clarify if the LLCs in question are treated as partnerships. 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. (11 CFR § 103.3(b)(1)) The refund must be made within 30 days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(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 was 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 prohibited amount will be taken into consideration.

4. Schedule A of your report discloses one or more contributions from an organization(s), which is not a political committee registered with the Commission (see attached). In order for your committee to accept contributions from unregistered organizations, your committee should take steps to ensure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 52 U.S.C. §§ 30116(f) and 30118 (formerly 2 U.S.C. §§ 441a(f) and 441b) or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: (1) establish a separate account which contains only those funds permitted under the Act, or (2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible.

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If you have received prohibited contributions, you must make a refund. (11 CFR § 103.3(b)(1)) The refund must be made within 30 days of the treasurer becoming aware of the illegality of the contribution. (11 CFR § 103.3(b)(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(b) or (c), as applicable, of the report covering the period in which the refund was 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 prohibited amount will be taken into consideration.

5. While it is permissible for a person to make a contribution for the general election prior to the primary election, the recipient committee must employ an acceptable accounting method to distinguish between primary and general election contributions. (11 CFR § 102.9(e)) This general election amount must be maintained in the committee's account.

Since the candidate will not participate in the general election, any contribution received for the general election must be returned to the donors or redesignated to the primary if your committee has net debts outstanding for the primary election. To redesignate a contribution the committee must either (1) obtain signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election, or (2) redesignate the contribution by presumption to the primary election, for undesignated contributions made after the primary but before the general election, provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing. The notification must give the contributor an opportunity to request a refund. A contribution can only be redesignated to a previous election to the extent that the contribution does not exceed net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i) and (5)(ii)(C))

The attached general election contributions do not appear to have been remedied. Any subsequent report(s) filed with the Commission must disclose the refund or redesignation of any general election contribution. Refunds or

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redesignations must be done within 60 days after the 2016 Primary Election.

Although the Commission may take further legal action, your prompt action to refund these contributions will be taken into consideration.

6. Schedule A of your report indicates that your committee may have failed to file one or more of the required 48-hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-Primary Report (see attached). A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. The failure to file 48-hour notices may result in civil money penalties or legal enforcement action. (11 CFR § 104.5(f))

If any contribution of \$1,000 or more was incorrectly reported, you must amend your original report with the clarifying information.

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. For additional information about the report review process or specific filing information for your committee type, please visit <http://www.fec.gov/rad/>. 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) 694-1154.

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Sincerely,

A handwritten signature in black ink that reads "Jill Sugarman". The signature is written in a cursive, flowing style.

Jill Sugarman
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

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**Excessive, Prohibited, and Impermissible Contributions
Wright 2016 (C00579433)**

Excessive Contributions from Individuals

Contributor Name	Date	Amount	Election
Catsimatidis, Margo	6/28/16	\$2,700.00	P2016
Catsimatidis, Margo	6/28/16	\$2,700.00	P2016
Davis, Gordon	12/9/15	\$1,000.00	P2016
Davis, Gordon	6/18/16	\$2,000.00	P2016
Silver, Adam	6/29/15	\$1,000.00	P2016
Silver, Adam	11/28/15	\$1,700.00	P2016
Silver, Adam	6/11/16	\$1,000.00	P2016

Excessive Contributions from Affiliated Committees

Contributor Name	Date	Amount	Election
Int'l Union of Operating Engineers Local 14-14B	11/30/15	\$250.00	P2016
Local 94-94A-94B IUOE Political Action Committee	6/8/16	\$2,500.00	P2016
International Union of Operating Engineers Local 14-14B Voluntary Political Committee	6/21/16	\$2,500.00	P2016

Contributions from Possible Prohibited Entities

Contributor Name	Date	Amount	Election
Nines Clothiers	6/21/16	\$1,000.00	P2016
Urban Builders Collaborative, LLC	6/27/16	\$1,000.00	P2016

Contributions from Unregistered Organizations

Contributor Name	Date	Amount	Election
Dickens for New York	6/23/16	\$1,000.00	P2016
Hoyleman for Senate	6/16/16	\$500.00	P2016

**General Election Contributions
Wright 2016 (C00579433)**

2015 July Quarterly Report

Contributor Name	Date	Amount	Election
Lewis, Carol S	6/30/15	\$2,700.00	G2016
Lewis, William M Jr	6/30/15	\$2,700.00	G2016
Seavey, Avery	6/30/15	\$2,700.00	G2016
Seavey, Harry S	6/30/15	\$2,700.00	G2016
Seavey, Lucy	6/30/15	\$2,700.00	G2016
Seavey, Ruby	6/30/15	\$2,700.00	G2016

2015 October Quarterly Report

Contributor Name	Date	Amount	Election
Agalli, Dennis	9/22/15	\$1,300.00	G2016
Guerrero, Christina	9/1/15	\$2,700.00	G2016
Liguori, Erol L.	9/22/15	\$2,300.00	G2016
Rubler, Allison	9/30/15	\$2,700.00	G2016
Salinas, Loreto	9/1/15	\$2,700.00	G2016
Tisch, Jonathan M	9/30/15	\$2,700.00	G2016
Tisch, Lizzie	9/30/15	\$2,700.00	G2016
Wg & Associates Management and Development LLC	9/1/15	\$2,700.00	G2016

2015 Year End Report

Contributor Name	Date	Amount	Election
Callaghan, Michael	12/31/15	\$2,300.00	G2016
Callaghan, Tiffany	12/31/15	\$2,300.00	G2016
Capoccia, Donald A.	12/9/15	\$2,700.00	G2016
Catsimatidis, John A.	12/23/15	\$2,700.00	G2016
DRIVE Committee	12/18/15	\$1,000.00	G2016
Giscombe, Eugene	12/9/15	\$1,000.00	G2016
Lemor Development Group LLC	10/29/15	\$2,700.00	G2016
Livingston, Craig	12/31/15	\$2,300.00	G2016
Livingston, Naeema	12/31/15	\$2,300.00	G2016
Ramseur, Kenneth E	12/9/15	\$2,700.00	G2016
Schneur, Eugene	12/14/15	\$1,000.00	G2016
Silver, Adam	11/28/15	\$300.00	G2016
Williams, M. Steven	12/14/15	\$1,050.00	G2016

2016 April Quarterly Report

Contributor Name	Date	Amount	Election
D'Amato, Alfonse M.	3/31/16	\$2,500.00	G2016
Donaldson & Chilliest LLP	3/10/16	\$2,700.00	G2016
Harter Secrest & Emery LLP	3/24/16	\$2,700.00	G2016

**General Election Contributions
Wright 2016 (C00579433)**

Morrison, Pamela Flood	3/10/16	\$50.00	G2016
Renew America PAC	3/31/16	\$200.00	G2016
Sacks, Ivan	3/27/16	\$300.00	G2016
Senay, Emily J	3/31/16	\$2,700.00	G2016
Tahl, Vicki	3/10/16	\$2,300.00	G2016
Williams, M. Steven	2/29/16	\$100.00	G2016
Zuffa Political Action Committee	2/5/16	\$1,300.00	G2016

2016 12 Day Pre-Primary Report

Contributor Name	Date	Amount	Election
Anthony T. Rinaldi, LLC	5/24/16	\$2,700.00	G2016
Cornfeld, Aruthur	6/6/16	\$2,700.00	G2016
Donald M. Payne Jr. for Congress	6/8/16	\$2,000.00	G2016
Friends of Kevin Parker Committee	5/3/16	\$1,000.00	G2016
Giscombe, Eugene	5/27/16	\$500.00	G2016
Greenwald, Allen	6/8/16	\$250.00	G2016
Hargress, Samuel	4/25/16	\$300.00	G2016
Jones, James H	4/25/16	\$2,400.00	G2016
O'Luck, Mark	6/8/16	\$1,050.00	G2016
Rivers, Voza	5/26/16	\$500.00	G2016
Seltzer, Eric	4/18/16	\$2,700.00	G2016

2016 July Quarterly Report

Contributor Name	Date	Amount	Election
Cross, Jay	6/23/16	\$2,300.00	G2016
DRIVE Committee	6/22/16	\$4,000.00	G2016
Fisher, Alan	6/20/16	\$2,700.00	G2016
Griffith, Pharein	6/28/16	\$2,700.00	G2016
Harra, William	6/20/16	\$2,900.00	G2016
Lansey, David	6/20/16	\$2,700.00	G2016
Morrison, Pamela Flood	6/25/16	\$2,000.00	G2016
O'Luck, Mark	6/25/16	\$1,250.00	G2016
Rosen, Jack	6/21/16	\$2,300.00	G2016
Rosen, Phyllis	6/21/16	\$2,300.00	G2016
Sutton, Michael	6/25/16	\$1,000.00	G2016

**Missing 48-Hour Notices
Wright 2016 (C00579433)**

Contributor Name	Date	Amount	Election
Gandulla, Luz	6/20/16	\$2,500.00	P2016
Brathwaite, Lee	6/24/16	\$1,000.00	P2016
Caesars Entertainment Corporation Political Action Committee	6/24/16	\$1,000.00	P2016
Entergy Corporation Political Action Committee (ENPAC)	6/24/16	\$1,000.00	P2016
Hagler, Beverly	6/24/16	\$2,700.00	P2016
Hagler, Daryl	6/24/16	\$2,700.00	P2016
McCabe, Elsie	6/24/16	\$2,000.00	P2016
Rozenberg, Beth	6/24/16	\$2,700.00	P2016
Rozenberg, Kenneth	6/24/16	\$2,700.00	P2016
Sutton, Pierre	6/24/16	\$2,700.00	P2016
Wilmot, Thomas C. Jr.	6/24/16	\$2,000.00	P2016
Bryant, James	6/25/16	\$1,000.00	P2016
Cornelius, Yasmin H	6/25/16	\$2,100.00	P2016
Morrison, Pamela Flood	6/25/16	\$2,000.00	G2016
O'Luck, Mark	6/25/16	\$1,250.00	G2016
Scott, Marion	6/25/16	\$1,000.00	P2016
Sutton, Michael	6/25/16	\$1,700.00	P2016
Sutton, Michael	6/25/16	\$1,000.00	G2016