



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

September 15, 2014

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

**Response Due Date**  
**10/20/2014**

IDENTIFICATION NUMBER: C00528182

REFERENCE: APRIL QUARTERLY REPORT (01/01/2014 - 03/31/2014)

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.** 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 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.

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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.

**2.** Schedule B supporting line 17 discloses payments to Jonathan Small with the following purposes: "Campaign loan partial repayment to Jonathan Small," and "Reimbursement loan to campaign."

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.

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**3.** On Schedule B supporting Line 17 of your report, you have itemized disbursements for which you have used the committee's name as the payee name. Commission Regulations require that you disclose the payee's name for each expenditure made by your committee. Please amend your report to include the missing information. (11 CFR § 104.3(b)(4))

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

**5.** 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/Advisor" and "check repayment." 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](http://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>.

**6.** Schedule B of your report discloses what appear to be 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)

**7.** Schedule B of your report discloses disbursements with the purposes "Per diem for DC trip" and "stipend" 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

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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.** Schedule B of your report discloses reimbursements to individuals for the attached travel-related disbursement(s). 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)

- Your report fails to provide election designations for contributions disclosed on Schedule(s) A for Line(s) 11(a). Please note that Authorized committees should indicate the election for which the contribution was designated. If no election is designated, the contribution is applied to the next election for the federal office the candidate is seeking after the contribution date. (11 CFR §§ 110.1(b)(2) and 110.2(b)(2))

**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

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press 5 to reach the Reports Analysis Division) or my local number (202) 694-1132.

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

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

<b>Employer</b>	<b>Occupation</b>
Blank	Attorney
Blank	Blank
Blank	Business Owner
Blank	Contractor
Blank	Dentist
Blank	Lawyer
Blank	Marketing Consultant
Blank	Money Manager
Blank	Physician
Blank	Transportation Executive
Blank	Writer
Self Employed	Business Owner

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

**Reimbursements to Individuals for Non-Travel Purposes**

<b>Name</b>	<b>Date</b>	<b>Amount</b>	<b>Purpose</b>
Plaskett, Stacey	2/6/14	\$200.00	Apps for general mtg.
Picou, Jean	3/24/14	\$929.00	Bumper Stickers
Plaskett, Stacey	3/31/14	\$2,200.00	Cool Session Brass Band
Plaskett, Stacey	1/15/14	\$1,500.00	DC fundraiser and expense
Plaskett, Stacey	3/31/14	\$180.00	Generator
Plaskett, Stacey	1/16/14	\$350.00	MLK Radio Ad
Picou, Jean	2/12/14	\$439.50	Palm cards
Picou, Jean	3/7/14	\$439.50	palm cards
Plaskett, Stacey	1/2/14	\$40.00	Parade accessories
Walker, Wendell	3/4/14	\$1,875.00	Prayer breakfast event
Plaskett, Stacey	1/16/14	\$700.00	Radio ads
Plaskett, Stacey	3/28/14	\$1,520.00	Radio ads reimbursement
Plaskett, Stacey	3/24/14	\$350.00	Radio Commercial
Plaskett, Stacey	3/19/14	\$850.00	Radio Commercial reimbursement
Garcia, Delmin	3/26/14	\$244.70	reimburse for office supplies, post and seaplane
Garcia, Delmin	2/25/14	\$630.00	reimbursement for seaborne airfare/radio ads/office supplies
Garcia, Delmin	2/6/14	\$510.00	reimbursement to cover bank OD

**Reimbursements to Individuals for Travel Purposes**

<b>Name</b>	<b>Date</b>	<b>Amount</b>	<b>Purpose</b>
Plaskett, Stacey	2/21/14	\$900.00	DC trip expenses
Plaskett, Stacey	3/6/14	\$1,400.00	DC trip, car rental, airfare, meals etc
Plaskett, Stacey	2/26/14	\$1,600.00	Expenses for DC trip
Plaskett, Stacey	3/31/14	\$220.00	Seaborne Airlines -Jonathan Smalls