



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE BEGINNING OF ADMINISTRATIVE FINE CASE # 2999

DATE SCANNED 6/9/2015

SCANNER NO. 2

SCAN OPERATOR EC

UNRECORDED



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2015 APR -7 PM 4:46

April 7, 2015

MEMORANDUM

**SENSITIVE**

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: Kristin D. Roser *KDR*  
Compliance Branch

SUBJECT: Reason to Believe Recommendation -  
Failure to File 48-Hour Notices under the Administrative Fine Program

Attached is the name of a principal campaign committee that has failed to file 48-hour notices with the Commission for contributions of \$1,000.00 or more received (1) from the close of books for the 2014 Virgin Islands 12 Day Pre-Primary Report up to 48 hours before the August 2, 2014 Primary Election, and (2) from the close of books for the 12 Day Pre-General Report up to 48 hours before the November 4, 2014 General Election in accordance with 52 U.S.C. § 30104(a) and 11 CFR. § 104.5(f). The committee, Virgin Islanders for Plaskett, represents a candidate who won the 2014 Primary and General Elections. The committee is being referred for failing to file 48-hour notices for contributions totaling \$42,472.00.

A 48-hour notice is required to report all contributions of a \$1,000.00 or more, to any authorized committee of a candidate, including contributions from the candidate, loans from the candidate and other non-bank sources and endorsements or guarantees of loans from banks, as per 11 CFR § 104.5(f).

We have attached an information sheet which includes the contributor name, date of receipt and amount of the contributions for which a 48-hour notice was not filed.



**Contributions for Which a 48-Hour Notice Was Not Received**

AF 2999

Committee ID: C00528182

Committee Name: Virgin Islanders for Plaskett

Report Types: October Quarterly Report (7/14/2014 - 9/30/2014)

30 Day Post-General Report (10/16/2014 - 11/24/2014)

Primary 48-Hour Reporting Period: 7/14/2014 - 7/30/2014

General 48-Hour Reporting Period: 10/16/2014 - 11/1/2014

CONTRIBUTOR	DATE	AMOUNT	REPORTING PERIOD
DASWANI, PRAKASH L.	7/15/2014	\$1,000.00	PRIMARY
DELSON, LAWRENCE	7/15/2014	\$2,600.00	PRIMARY
DLUGASH, ALAN	7/15/2014	\$2,600.00	PRIMARY
GROFF, LESLEY	7/15/2014	\$2,600.00	PRIMARY
HANSON, STEVEN	7/15/2014	\$2,600.00	PRIMARY
RODRIGUEZ, ANN	7/15/2014	\$1,000.00	PRIMARY
RODRIGUEZ, ANN	7/15/2014	\$1,000.00	PRIMARY
SUSSMAN, S. DONALD	7/15/2014	\$2,600.00	PRIMARY
SUSSMAN, S. DONALD	7/15/2014	\$2,600.00	PRIMARY
SMITH, WILLIAM	7/27/2014	\$2,500.00	PRIMARY
HENDERSON, CHARLEENE	7/29/2014	\$1,600.00	PRIMARY
HENDERSON, CHARLEENE	7/29/2014	\$2,550.00	PRIMARY
DEJONGH, CECILE	10/16/2014	\$1,000.00	GENERAL
DUANE MORRIS GOVERNMENT COMMITTEE	10/16/2014	\$1,000.00	GENERAL
FETTERHOFF, JEFFREY D.	10/16/2014	\$1,000.00	GENERAL
SHORE PAC	10/16/2014	\$2,000.00	GENERAL
DLA PIPER LLP (US) POLITICAL ACTION COMMITTEE (DLA PIPER PAC)	10/16/2014	\$1,000.00	GENERAL
DOONEY, THOMAS	10/20/2014	\$2,000.00	GENERAL
RAMSEY, SCOTT	10/22/2014	\$4,722.00	GENERAL
FRIENDS OF DON BEYER	10/23/2014	\$1,000.00	GENERAL
SHORE PAC	10/29/2014	\$2,500.00	GENERAL
AMERICAN FEDERATION OF TEACHERS STAFF UNION COMMITTEE ON POLITICAL EDUCATION	10/30/2014	\$1,000.00	GENERAL
	<b>TOTAL</b>	<b>\$42,472.00</b>	

**Proposed Civil Money Penalty: \$7,855.00** (((9 Notices Not Filed at \$110 each) + (10% of the Overall Contributions Not Filed)) x (2 x 25%)) + ((9 Notices Not Filed at \$110 each) + (10% of the Overall Contributions Not Filed))

441110-10001

Federal Election Commission  
Reason to Believe Circulation Report  
48-Hour Notification Report

4/7/2015 2:42 PM

AF#	Committee ID	Committee Name	State	Election	Candidate Name	Treasurer	Prev Violations	Notices Not Filed	LOA	Penalty
2999	C00528182	VIRGIN ISLANDERS FOR PLASKETT	VI	2014	PLASKETT, STACEY	HYNDMAN, MICHELE	2	10	\$42,472	\$7,855

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Reason To Believe Recommendation – ) AF 2999  
Failure to File 48-Hour Notices under the )  
Administrative Fine Program: Virgin )  
Islanders for Plaskett and Michele )  
Hyndman, Treasurer )

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on April 09, 2015, the Commission decided by a vote of 6-0 to take the following actions in AF 2999:

1. Find reason to believe that Virgin Islanders for Plaskett and Michele Hyndman, Treasurer, violated 52 U.S.C. § 30104(a) and make a preliminary determination that a civil money penalty of \$7,855 be assessed.
2. Send the appropriate letter.

Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

Attest:

April 10, 2015  
Date

Shawn Woodhead Werth  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 10, 2015

Michele Hyndman, in official capacity as Treasurer  
Virgin Islanders for Plaskett  
P.O. Box 26502  
Christiansted, VI 00824

C00528182  
AF#: 2999

Dear Ms. Hyndman:

The Federal Election Campaign Act of 1971, as amended, 52 U.S.C. § 30101, *et seq.* ("the Act"), requires principal campaign committees of candidates for federal office to notify in writing either the Secretary of the Senate or the Federal Election Commission ("FEC"), and the Secretary of State, as appropriate, of any contribution of \$1,000 or more, received by any authorized committee of the candidate after the 20th day, but more than 48 hours before, any election. 52 U.S.C. § 30104(a)(6)(A). The Act further requires notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and office sought, the date of receipt, the amount of the contribution, and the identification of the contributor. *Id.* These notification requirements are in addition to all other reporting requirements. 52 U.S.C. § 30104(a). Our records indicate that Virgin Islanders for Plaskett did not submit 48-Hour Notices for contributions of \$1,000 or more, received between July 15, 2014 and October 30, 2014 totaling \$42,472, as required by 52 U.S.C. § 30104(a)(6)(A). Attachment 1.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109(a)(4). On April 9, 2015, the FEC found that there is Reason to Believe ("RTB") that Virgin Islanders for Plaskett and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file the 48-Hour Notices. Based on the FEC's schedule of civil money penalties at 11 CFR § 111.44, the amount of your civil money penalty calculated at the RTB stage is \$7,855. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 2. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. The amount of the civil money penalty is \$110 for each non-filed notice plus 10 percent of the dollar amount of the contributions not timely reported. The civil money penalty increases by 25 percent for each prior violation. Send your payment of \$7,855 within forty (40) days of the finding, or by May 19, 2015.

At this juncture, the following courses of action are available to you:

**1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty**



Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate

### 3. If You Choose to Pay the Civil Money Penalty

## NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact David Garr in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

**On behalf of the Commission,**

John M Ravel

**Ann M. Ravel  
Chair**

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**ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.44, the amount of your civil money penalty calculated at RTB is \$7,855 for the 2014 Primary and General Election 48-Hour Notification Report.

Please mail this remittance with a check or money order made payable to the Federal Election Commission to the following address:

Federal Election Commission  
P.O. Box 979058  
St. Louis, MO 63197-9000

If you choose to send your remittance and payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox  
FEC #979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

The remittance and your payment are due by May 19, 2015. Upon receipt of your remittance and payment, the FEC will send you a final determination letter.

**PAYMENTS BY PERSONAL CHECK**

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**  
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FOR: Virgin Islanders for Plaskett

FEC ID#: C00528182

AF#: 2999

PAYMENT DUE DATE: May 19, 2015

PAYMENT AMOUNT DUE: \$7,855

**Contributions for Which a 48-Hour Notice Was Not Received**

AF 2999

Committee ID: C00528182

Committee Name: Virgin Islanders for Plaskett

Report Types: October Quarterly Report (7/14/2014 - 9/30/2014)

30 Day Post-General Report (10/16/2014 - 11/24/2014)

Primary 48-Hour Reporting Period: 7/14/2014 - 7/30/2014

General 48-Hour Reporting Period: 10/16/2014 - 11/1/2014

CONTRIBUTOR	DATE	AMOUNT	REPORTING PERIOD
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DELSON, LAWRENCE	7/15/2014	\$2,600.00	PRIMARY
DLUGASH, ALAN	7/15/2014	\$2,600.00	PRIMARY
GROFF, LESLEY	7/15/2014	\$2,600.00	PRIMARY
HANSON, STEVEN	7/15/2014	\$2,600.00	PRIMARY
RODRIGUEZ, ANN	7/15/2014	\$1,000.00	PRIMARY
RODRIGUEZ, ANN	7/15/2014	\$1,000.00	PRIMARY
SUSSMAN, S. DONALD	7/15/2014	\$2,600.00	PRIMARY
SUSSMAN, S. DONALD	7/15/2014	\$2,600.00	PRIMARY
SMITH, WILLIAM	7/27/2014	\$2,500.00	PRIMARY
HENDERSON, CHARLEENE	7/29/2014	\$1,600.00	PRIMARY
HENDERSON, CHARLEENE	7/29/2014	\$2,550.00	PRIMARY
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FETTERHOFF, JEFFREY D.	10/16/2014	\$1,000.00	GENERAL
SHORE PAC	10/16/2014	\$2,000.00	GENERAL
DLA PIPER LLP (US) POLITICAL ACTION COMMITTEE (DLA PIPER PAC)	10/16/2014	\$1,000.00	GENERAL
DOONEY, THOMAS	10/20/2014	\$2,000.00	GENERAL
RAMSEY, SCOTT	10/22/2014	\$4,722.00	GENERAL
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SHORE PAC	10/29/2014	\$2,500.00	GENERAL
AMERICAN FEDERATION OF TEACHERS STAFF UNION COMMITTEE ON POLITICAL EDUCATION	10/30/2014	\$1,000.00	GENERAL
TOTAL		\$42,472.00	

**Proposed Civil Money Penalty: \$7,855.00 (((9 Notices Not Filed at \$110 each) + (10% of the Overall Contributions Not Filed)) x (2 x 25%)) + ((9 Notices Not Filed at \$110 each) + (10% of the Overall Contributions Not Filed))**



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2015 MAY 21 P 4: 20

May 21, 2015

MEMORANDUM

**SENSITIVE**

TO: The Commission

THROUGH: Alec Palmer *sw/Hfn*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Debbie Chacona *DC*  
Assistant Staff Director  
Reports Analysis Division

BY: Kristin D. Roser *KDR*  
Reports Analysis Division  
Compliance Branch

SUBJECT: Administrative Fine Program – Final Determination Recommendation for the  
Failure to File 48-Hour Notices

Attached is a list identifying a political committee and its treasurer against which the Commission has found reason to believe (RTB) and assessed a proposed civil money penalty calculated at RTB for failure to file or failure to timely file the appropriate 48 Hour Notices for the Virgin Islands 2014 Primary Election and General Election. The committee has not paid the civil money penalty requested at RTB and has been given at least forty (40) days from the date of the Commission's RTB finding to remit payment.

In accordance with 11 CFR § 111.40, the Commission shall send a final determination notice to the respondent that has not paid the civil money penalty.

**RAD Recommendation**

- (1) Make a final determination that the political committee and its treasurer listed on the attached report violated 52 U.S.C. § 30104(a) and assess the final civil money penalty so indicated.
- (2) Send the appropriate letter.

Federal Election Commission  
Final Determination Circulation Report  
48-Hour Notification Report

5/21/2015 9:55 AM

AF#	Committee ID	Committee Name	State	Election	Candidate Name	Treasurer	Prev Violations	Notices Not Filed	LOA	RTB Date	RTB Penalty	Days Since RTB	FD Penalty
2999	C00528182	VIRGIN ISLANDS FOR PLASKETT	VI	2014	PLASKETT, STACEY	JONATHAN BUCKNEY SMALL	2	9	\$42,472	04/09/2015	\$7,855	42	\$7,855

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Administrative Fine Program - Final ) AF 2999  
Determination Recommendation for the )  
Failure to File 48-Hour Notices: Virgin )  
Islands for Plaskett and Jonathan )  
Buckney Small, Treasurer )

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election Commission, do hereby certify that on May 26, 2015, the Commission decided by a vote of 6-0 to take the following actions in AF 2999:

1. Make a final determination that Virgin Islands for Plaskett and Jonathan Buckney Small, Treasurer violated 52 U.S.C. § 30104(a) and assess the final civil money penalty in the amount of \$7,855.
2. Send the appropriate letter.

Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

Attest:

May 27, 2015  
Date

Shawn Woodhead Werth  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 27, 2015

Jonathan Buckney Small, in official capacity as Treasurer  
Virgin Islands for Plaskett  
P.O. Box 26502  
Christiansted, VI 00824

C00528182  
AF#: 2999

Dear Mr. Small:

On April 9, 2015, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that Virgin Islands for Plaskett and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) for failing to file 48-Hour Notices for contributions of \$1,000 or more, received between July 15, 2014 and October 30, 2014, totaling \$42,472. By letter dated April 10, 2015, the Commission notified you of the RTB finding and the civil money penalty calculated at the RTB stage to be \$7,855 in accordance with the schedule of penalties at 11 CFR § 111.44. Within forty (40) days of the FEC's RTB finding, you, as treasurer, were required to either transmit payment of the calculated civil money penalty or submit a written response challenging either the RTB finding or the calculated civil money penalty.

The FEC did not receive payment of the calculated civil money penalty or a written response within the time permitted. The FEC made a final determination on May 26, 2015 that Virgin Islands for Plaskett and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assessed a civil money penalty in the amount of \$7,855 in accordance with 11 CFR § 111.44.

At this juncture, the following courses of action are available to you:

**1. If You Choose to Appeal the Final Determination and/or Civil Money Penalty**

If you choose to appeal the final determination, you should submit a written petition, within thirty (30) days of receipt of this letter, to the U.S. District Court for the district in which the committee or you reside, or transact business, requesting that the final determination be modified or set aside. See 52 U.S.C. §30109(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 52 U.S.C. § 30109. 11 CFR § 111.38.

**2. If You Choose Not to Pay the Civil Money Penalty and Not to Appeal**



Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA") as amended by the Debt Collection Improvement Act of 1996 ("DCIA"), 31 U.S.C. § 3701 *et seq.* If you do not pay this debt within thirty (30) days (or file a written petition to a federal district court - see below), the Commission will transfer the debt to the U.S. Department of the Treasury ("Treasury") for collection. Within five (5) days of the transfer to Treasury, Treasury will contact you to request payment. Treasury currently charges a fee of 28% of the civil money penalty amount for its collection services. The fee will be added to the amount of the civil money penalty that you owe. Should Treasury's attempts fail, Treasury will refer the debt to a private collection agency ("PCA"). If the debt remains unpaid, Treasury may recommend that the Commission refer the matter to the Department of Justice for litigation.

Actions which may be taken to enforce recovery of a delinquent debt by Treasury may also include: (1) offset of any payments, which the debtor is due, including tax refunds and salary; (2) referral of the debt to agency counsel for litigation; (3) reporting of the debt to a credit bureau; (4) administrative wage garnishment; and (5) reporting of the debt, if discharged, to the IRS as potential taxable income. In addition, under the provisions of DCIA and other statutes applicable to the FEC, the debtor may be subject to the assessment of other statutory interest, penalties, and administrative costs.

In accordance with the DCIA, at your request, the agency will offer you the opportunity to inspect and copy records relating to the debt, the opportunity for a review of the debt, and the opportunity to enter into a written repayment agreement.

### **3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the civil money penalty, send the enclosed remittance form, along with your payment, to the address on page 4 within thirty (30) days of receipt of this letter.

## **NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

### **4. Partial Payments**

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

### **5. Settlement Offers**

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assessed upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 C.F.R. §§ 111.42(b) and 111.20(c), the file will be placed on the public record within 30 days from the date of this notification.

If you have any questions regarding the payment of the civil money penalty, please contact David Garr at Federal Election Commission, 999 E St., NW, Washington, DC 20463, or our toll free number (800) 424-9530 (at the prompt, press 5) or (202) 694-1130.

On behalf of the Commission,

John M Ravel

**Ann M. Ravel  
Chair**

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**ADMINISTRATIVE FINE PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.44, the civil money penalty is \$7,855 for the 2014 Primary and General Election 48-Hour Notification Report.

This penalty should be paid by check or money order made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission  
PO Box 979058  
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please use this address:

U.S. Bank - Government Lockbox  
FEC #979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

The form and payment are due within thirty (30) days of receipt of this letter.

**Payments by Personal Check**

Personal checks will be converted into electronic funds transfers (EFTs). Your account will be electronically debited for the amount on the check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**

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FOR: Virgin Islands for Plaskett

FEC ID#: C00528182

AF#: 2999

PAYMENT AMOUNT DUE: \$7,855



FEDERAL ELECTION COMMISSION  
Washington DC 20463

THIS IS THE END OF ADMINISTRATIVE FINE CASE # 2999

DATE SCANNED 6/9/2015

SCANNER NO. 2

SCAN OPERATOR EL