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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

**SENSITIVE****MEMORANDUM**

December 21, 2020

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

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

Krista J. Roche *KJR*  
Director, ADR Office

Rosa Marshall *RM*  
Assistant Director, ADR Office

SUBJECT: Recommendation to Approve Negotiated Settlement  
ADR 972 - VIGOP (Virgin Islands Republican Party)  
and John Canegata, Treasurer (C00553560)

RESOLUTION TERMS: Develop and certify implementation of a process to ensure that receipts are timely reviewed for excessive contributions; develop and certify implementation of a compliance operations manual; and pay a civil penalty of \$2,445.

Attached for your review is a signed ADR Negotiated Settlement pertaining to ADR 972 (RAD 20L-15). The ADR Office received this referral on August 13, 2020.

**SUMMARY:** The Reports Analysis Division (RAD) referred VIGOP (Virgin Islands Republican Party<sup>1</sup>) and John Canegata, Treasurer (Respondents or the Committee) for failing to remedy excessive receipts totaling \$32,600 within the permissible timeframe during the 2019 calendar year. All contributions addressed in the referral have been remedied, albeit untimely.

<sup>1</sup> VIGOP (Virgin Islands Republican Party) (“the Committee”) is a qualified nonconnected committee, as it has not met qualifications to be a State Party Committee.

At the time of the referral, one (1) excessive contribution remained outstanding, which has since been remedied by the Committee. Additionally, Respondents state that a new compliance staff, familiar with FEC reporting procedures, has been hired.

**RECOMMENDATIONS:**

1. Approve the attached Negotiated Settlement of VIGOP (Virgin Islands Republican Party) and John Canegata, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.