



## VIGOP response to AR 17-11R

The Federal Election Commission has ascertained information in the normal course of carrying out its supervisory responsibilities that indicate the committee may have violated the Federal Election Campaign Act of 1971, as amended. This is the committee's response to the issue raised by the Commission's review.

- 1. 2016 March Monthly Report: Schedule A supporting Line 11(a)(i) disclosed the receipt of excessive contributions totaling \$7,750.00, of the Committee's total contributions from individuals. These contributions were received from three (3) individuals.**

The committee reported three (3) donors on its March 2016 Monthly Report whose aggregate contributions exceeded \$5,000 within the calendar year:

RPT ID	LAST	FIRST	AMOUNT	AGGREGATE
SA11AI.9552	BELDING 064	MAXWELL	5,000.00	6,750.00
SA11AI.11286	GATES 782	ALONZO	5,000.00	10,000.00
SA11AI.11944	HILLMAN 025	TATNALL	5,000.00	6,000.00

VIGOP is the recognized Republican Party of the U.S. Virgin Islands and as such, the annual contribution limit for an individual to a state, district or local party committee is \$10,000. [See Attachment #1.]

- 2. 2016 Amended April Monthly Report: Schedule A supporting Line 11(a)(i) disclosed the receipt of excessive contributions totaling \$3,700.00, of the Committee's total contributions from individuals. These contributions were received from two (2) individuals.**

The committee reported two (2) donors on its April 2016 Monthly Report whose aggregate contributions exceeded \$5,000 within the calendar year:

RPT ID	LAST	FIRST	AMOUNT	AGGREGATE
SA11AI.18407	HILLMAN 025	TATNALL	1,000.00	7,000.00
SA11AI.19057	MARTIN 330	ROBERT T	5,000.00	7,700.00

As stated above the FEC should be applying a \$10,000 limit and not a \$5,000 limit.

3. **2016 August Monthly Report: Schedule A supporting Line 11(a)(i) disclosed the receipt of excessive contributions totaling \$4,100.00, of the Committee's total contributions from individuals. These contributions were received from two (2) individuals.**

As in the above two responses, two (2) donors made contributions aggregating in excess of \$5,000 but less than \$10,000 and therefore the committee disagrees that any excess contributions were received.

4. **2016 Amended May Monthly Report: Schedule E supporting Line 24 contained activity outside of the reporting period totaling \$77,086.25**

After reviewing the Amended May 2016 Monthly Report, the committee found that all the activity contained on Line 24 was properly accounted for and not outside the reporting period.

5. **2016 August Monthly Report: Schedule E supporting Line 24 disclosed memo entries totaling \$105,619.25 that did not appear to correspond with any itemized transaction(s).**

This report is under review and will be amended as necessary.

6. **2016 September Monthly Report: Schedule E supporting Line 24 contained activity outside of the reporting period totaling \$69,925.40**

The September 2016 Monthly Report contained the following Memo entries that were outside of the reporting period:

RPT ID	ORGANIZATION	DISSEMINATION	AMOUNT
SE.45871	FORTH RIGHT STRATEGY INC	20160907	13,520.41
SE.45874	FORTH RIGHT STRATEGY INC	20160907	1,138.10
SE.45875	FORTH RIGHT STRATEGY INC	20160907	1,138.10
SE.45876	FORTH RIGHT STRATEGY INC	20160907	1,138.10
SE.45877	FORTH RIGHT STRATEGY INC	20160907	1,138.09
SE.45878	FORTH RIGHT STRATEGY INC	20160907	1,138.09
SE.45879	FORTH RIGHT STRATEGY INC	20160907	1,138.09
SE.45880	FORTH RIGHT STRATEGY INC	20160907	1,138.09
SE.45889	FORTH RIGHT STRATEGY INC	20160909	11,853.98
SE.45890	FORTH RIGHT STRATEGY INC	20160909	11,853.98
SE.45891	FORTH RIGHT STRATEGY INC	20160909	11,853.98
SE.45896	FORTH RIGHT STRATEGY INC	20160909	4,292.13
SE.45897	FORTH RIGHT STRATEGY INC	20160909	4,292.13
SE.45898	FORTH RIGHT STRATEGY INC	20160909	4,292.13
<b>MEMO ENTRIES ON SEPT REPORT IN ERROR</b>			<b>69,925.40</b>

After determining whether or not there is a problem with the software the committee will file an amendment with the appropriate corrections.

7. **2016 12 Day Pre-General Report: Schedule E supporting Line 24 disclosed memo entries totaling \$56,252.81 that did not appear to correspond with any itemized transaction(s).**

This report is under review and will be amended as necessary.

8. **2016 March Monthly Report: Schedule E disclosed memo entries for three (3) independent expenditures totaling \$20,000.00, which were publicly disseminated prior to payment but failed to disclose a debt on Schedule D.**

The three (3) Memo entries mentioned above (and listed below) totaling \$20,000 were paid within the reporting period; as such, there was no need to disclose a debt on Schedule D.

RPT ID	ORGANIZATION	DISBURSEMENT	AMOUNT
SE.16494	AINSLEY SHEA	20160201	7,992.00
SE.16493	CAMPAIGNGRID DIRECT	20160201	7,000.00
SE.16492	NCC MEDIA	20160201	5,008.00
<b>MEMO ENTRIES PAID WITHIN REPORT PERIOD</b>			<b>20,000.00</b>

9. **2016 Amended April Monthly Report: The Committee failed to file a required 48-Hour Report for \$40,202.16 in independent expenditures disclosed on Schedule E.**

The committee filed five (5) Form 24 (48 Hour Notices) for Line 24 Independent Expenditures disseminated in the month of March 2016. The original Form 24s were later amended however, there was not an additional \$40,202.16 that failed to be reported within the 48-Hour time period.

Report	Filed	File #	Dissemination	Candidate	S/O	48 hr Notice
Form 24	3/11/2016	FEC-1054693	3/9/2016	Clinton, Hillary	O	11,604.36
Form 24	3/20/2016	FEC-1056950	3/18/2016	Clinton, Hillary	O	8,298.81
Form 24	3/25/2016	FEC-1057487	3/23/2016	11 Candidates	S	23,468.39
Form 24	3/25/2016	FEC-1057488	3/24/2016	3 Candidates	S	12,476.16
Form 24	4/1/2016	FEC-1057976	3/30/2016	Clinton, Hillary	O	12,912.66
<b>48hr NOTICES FILED FOR MARCH 2016 INDEPENDENT EXPENDITURES</b>						<b>68,760.38</b>

10. **2016 Amended May Monthly Report: The Committee failed to file a required 48-Hour Report for \$31,792.87 in independent expenditures disclosed on Schedule E.**

The committee filed four (4) Form 24 (48 Hour Notices) for Line 24 Independent Expenditures disseminated in the month of April 2016. The original Form 24s were later amended however, there was not an additional \$31,792.87 that failed to be reported within the 48-Hour time period.

Report	Filed	File #	Dissemination	Candidate	S/O	48 hr Notice
Form 24	4/1/2016	FEC-1057977	4/1/2016	3 Candidates	S	11,267.28
Form 24	4/5/2016	FEC-1058248	4/4/2016	3 Candidates	S	22,500.15
Form 24	4/10/2016	FEC-1059300	4/8/2016	Clinton, Hillary	O	8,085.73
Form 24	4/13/2016	FEC-1061012	4/11/2016	7 Candidates	S	6,429.92
<b>48hr NOTICES FILED FOR APRIL 2016 INDEPENDENT EXPENDITURES</b>						<b>48,283.08</b>

11. **2016 June Monthly Report: The Committee failed to provide a Schedule E for one hundred fifty-nine (159) independent expenditures totaling \$77,086.21 disclosed on five (5) 48-Hour Reports.**

***The Committee failed to file a required 48-Hour Report for \$20,262.02 in independent expenditures disclosed on Schedule E.***

The committee filed five (5) Form 24 (48 Hour Notices) for Line 24 Independent Expenditures disseminated in the month of May 2016. The original Form 24s were later amended however, there was not an additional \$20,262.02 that failed to be reported within the 48-Hour time period.

Report	Filed	File #	Dissemination	Candidate	S/O	48 hr Notice
Form 24	5/17/2016	FEC-1072497	5/16/2016	3 Candidates	S	696.37
Form 24	5/17/2016	FEC-1072498	5/16/2016	Clinton, Hillary	O	32,168.04
Form 24	5/26/2016	FEC-1074629	5/23/2016	Clinton, Hillary	O	4,141.06
Form 24	5/29/2016	FEC-1075254	5/27/2016	3 Candidates	S	26,977.88
Form 24	6/1/2016	FEC-1075459	5/31/2016	Clinton, Hillary	O	13,102.86
<b>48hr NOTICES FILED FOR MAY 2016 INDEPENDENT EXPENDITURES</b>						<b>77,086.21</b>

***12. 2016 July Monthly Report: The Committee failed to provide a Schedule E for forty-two (42) independent expenditures totaling \$15,092.14 disclosed on three (3) 48-Hour Reports. The Committee failed to file a required 48-Hour Report for \$35,676.19 in independent expenditures disclosed on Schedule E.***

The committee filed three (3) Form 24 (48 Hour Notices) for Line 24 Independent Expenditures disseminated in the month of June 2016. The original Form 24s were later amended however, there was not an additional \$35,676.19 that failed to be reported within the 48-Hour time period.

Report	Filed	File #	Dissemination	Candidate	S/O	48 hr Notice
Form 24	6/8/2016	FEC-1076597	6/6/2016	Clinton, Hillary	O	19,932.21
Form 24	6/13/2016	FEC-1077233	6/13/2016	4 Candidates	S/O	13,649.77
Form 24	6/15/2016	FEC-1077407	6/15/2016	12 Candidates	S/O	25,690.29
<b>48hr NOTICES FILED FOR JUNE 2016 INDEPENDENT EXPENDITURES</b>						<b>59,272.27</b>

***13. 2016 August Monthly Report: The Committee failed to provide a Schedule E for one (1) independent expenditure totaling \$13,115.24 disclosed on one (1) 48-Hour Report. The Committee failed to file a required 48-Hour Report for \$72,201.31 in independent expenditures disclosed on Schedule E.***

The committee filed eight (8) Form 24 (48 Hour Notices) for Line 24 Independent Expenditures:

Report	Filed	File #	Dissemination	Candidate	S/O	48 hr Notice
Form 24	7/11/2016	FEC-1082649	7/9/2016	Clinton, Hillary	O	22,569.06
Form 24	7/11/2016	FEC-1082650	7/9/2016	3 Candidates	S	16,925.07
Form 24	7/11/2016	FEC-1082655	7/10/2016	3 Candidates	S	10,164.81
Form 24	7/11/2016	FEC-1082656	7/10/2016	Clinton, Hillary	O	13,115.24
Form 24	7/17/2016	FEC-1087853	7/15/2016	3 Candidates	S	18,425.52
Form 24	7/18/2016	FEC-1087871	7/18/2016	Clinton, Hillary	O	12,307.38
Form 24	7/22/2016	FEC-1090357	7/20/2016	Clinton, Hillary	O	13,115.24
Form 24	7/27/2016	FEC-1091253	7/27/2016	Clinton, Hillary	O	12,094.25
<b>48hr NOTICES FILED FOR JULY 2016 INDEPENDENT EXPENDITURES</b>						<b>118,716.57</b>

These 48-Hour Notices require amendments and itemization on Line 24 of the Independent Expenditures. However, there was not an additional \$72,201.31 that failed to be reported within the 48-Hour time period.

**14. 2016 September Monthly Report: Schedule E disclosed memo entries for thirty-eight (38) independent expenditures totaling \$160,338.65, which were publicly disseminated prior to payment but failed to disclose a debt on Schedule D. These memo entries did not appear to correspond with any itemized transaction(s).**

When the committee files a Form 24 identifying an Independent Expenditure related to Voter Contact mail, it generally is identified as being solely attributed to ForthRight Strategy, Inc. (FRS) because FRS is responsible for the management and creative responsibilities related to these mailings. Later when the Treasurer has all the amounts related to each vendor, the Form 24 is amended, and the disbursements are itemized on Line 24. The September Report disclosed memo entries for Independent Expenditures totaling \$160,338.65 and, on that report, the direct mail vendors who create these mailings incurred the following debts:

DEBTOR OR CREDITOR	Incurred
CONSOLIDATED MAILING SERVICES	97,066.83
DONOR BUREAU	1,548.08
DSSI	15,782.53
FORTHRIGHT STRATEGY INC	15,883.74
LEGACY LIST MANAGEMENT INC	6,316.13
PROLIST DIRECT MARKETING SRV	8,895.30
<b>Debts Incurred August 2016</b>	<b>145,492.61</b>

In addition, Direct Support Services, Inc. expended \$35,385.92 for direct mail postage in the month of August and much of that postage would have been a part of the \$160,338.65 identified on Forms 24. Therefore, it is incorrect to say that the committee failed to disclose a debt of that amount on Schedule D.

**15. 2016 October Monthly Report: The Committee failed to provide a Schedule E for four (4) independent expenditures totaling \$49,082.35 disclosed on two (2) 48-Hour Reports. Schedule E disclosed memo entries for twelve (12) independent expenditures totaling \$153,818.36, which were publicly disseminated prior to payment but failed to disclose a debt on Schedule D. These memo entries did not appear to correspond with any itemized transaction(s). The Committee failed to file a required 48-Hour Report for \$140,525.35 in independent expenditures disclosed on Schedule E.**

The October Report disclosed memo entries for Independent Expenditures totaling \$153,818.36 and, on that report, the direct mail vendors who create these mailings incurred the following debts:

DEBTOR OR CREDITOR	Incurred
CONSOLIDATED MAILING SERVICES	47,678.4
DONOR BUREAU	153.17
DSSI	4,425.01
FORTHRIGHT STRATEGY INC	67,247.29
INTEGRAM	4,952.79
LEGACY LIST MANAGEMENT INC	20,266.33
<b>Debts Incurred September 2016</b>	<b>144,722.99</b>

**16. 2016 Amended 30 Day Post-General Report: Schedule E disclosed memo entries for ten (10) independent expenditures totaling \$32,658.18, which were publicly disseminated prior to payment but failed to disclose a debt on Schedule D. These memo entries did not appear to correspond with any itemized transaction(s). The Committee failed to file a required 48-Hour Report for \$9,754.71 in independent expenditures disclosed on Schedule E.**

The Amended 30-Day Post-Election Report disclosed memo entries for Independent Expenditures totaling \$32,658.18 and, on that report, the direct mail vendors who create these mailings incurred the following debts:

<b>DEBTOR OR CREDITOR</b>	<b>Incurred</b>
CONSOLIDATED MAILING SERVICES	14,175.66
DSSI	7,352.93
FORTHRIGHT STRATEGY INC	3,628.98
INTEGRAM	9,139.51
<b>Debts Incurred Post-General 2016</b>	<b>34,297.08</b>

As stated above the debts incurred and disbursements reported within the period preclude the need for an additional \$32,658.18 debt to be reported on Schedule D. The committee is in the process of filing an amendment to allocate expenditures from Line 21b to Line 24. But no additional Form 24 is required in the amount of \$9,754.71.

**17. 2016 October Monthly Report: Schedule A supporting Line 11(a)(i) failed to disclose adequate identification for 170 of 843, of the contributions from individuals that require itemization.**

Many of the donors who contribute to VIGOP do so on multiple occasions. Sometimes they provide their Occupation and Employer information and sometimes not. Therefore, the Treasurer maintains a donor Masterfile that includes the full name and address of the donor with Occupation and name of Employer. At the time of reporting, the contribution information (i.e., amount and date) from the raw data is linked to the Masterfile and missing Occ/Emp info is retrieved through the committee's "best efforts" program. It appears that for the October 2016 Monthly Report, the raw donor file and not the Masterfile plus contribution information was imported to FECfile. The committee will file an amended report to correct this error.

**18. 2016 August Monthly Report: Schedule B supporting Line 21(b) failed to provide clarifying information or the original vendor(s) regarding one (1) reimbursement to an individual totaling \$12,828.55.**

The following individual was reimbursed for expenses incurred at the Republican National Convention in July 2016 as follows:

<b>John Canegata - Republican National Convention Expenses</b>		
<b>Vendor</b>	<b>Purpose</b>	<b>Amount</b>
Akron West Hilton	Group Lodging & Hotel Expenses	7,330.17
Cleveland Marriott	Group Lodging & Hotel Expenses	1,160.36
Cleveland Hilton	Group Lodging & Hotel Expenses	3,366.01
American Airlines	Airline Tickets & Baggage Fees	947.66
<b>Itemized Expenses by Vendor</b>		<b>12,804.20</b>

The committee is in the process of amending the August 2016 Monthly Report to provide this information as a memo entry clarification.

**19. 2016 Amended 30-Day Post-General Report: Schedule B supporting Line 29 failed to provide clarifying information or the original vendor(s) regarding two (2) reimbursements to one (1) individual totaling \$25,867.12**

The following individual was reimbursed for expenses incurred on behalf of VIGOP:

<b>Dennis Lennox - VIGOP Mailing &amp; RNC Winter Meeting Expenses</b>		
<b>Vendor</b>	<b>Purpose</b>	<b>Amount</b>
Amplified Mail	Reimbursed VIGOP Mail Expense	16,087.96
Key Bridge Marriott	Hotel Lodging Expenses	2,630.80
Delta Airlines	Air Travel	518.76
Omni Shoreham	Hotel Lodging Expenses (Jevon Williams)	3,257.55
Omni Shoreham	Hotel Lodging Expenses (Lillianna O'Neal)	3,372.05
<b>Itemized Expenses by Vendor</b>		<b>25,867.12</b>

The committee is in the process of amending the 30-Day 2016 Post-General Report to provide this information as a memo entry clarification.

**20. 2016 Amended April Monthly Report: Schedule E failed to disclose the correct office sought, state, and district of federal candidates and correct election designations for ten (10) independent expenditures totaling \$14,934.42**

The committee is in the process of amending the April 2016 Monthly Report to correct the office sought, state and district of federal candidates whose information was wrongly designated.

This response is directed to the General Counsel's Office and is submitted under oath.



Scott B. Mackenzie  
Treasurer



**Republican  
National  
Committee**

**AUDIT REFERRAL #17-11R**  
*Response Attachment*

*cdennis*  
Digitally signed by Christal Dennis  
Date: 2018.02.12 09:07:24 -05'00'

October 27, 2014

Federal Election Commission  
999 E Street NW  
Washington, DC 20463

To whom it may concern,

I am the Regional Political Director at the Republican National Committee responsible for the United States Virgin Islands and the other U.S. Territories. The Republican Party of the United States Virgin Islands is a territorial party that is accorded certain privileges equivalent to those of state parties under the Rules of the Republican Party.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tiffany Watkins'.

Tiffany Watkins  
Regional Political Director  
Northeast and Territories