NORTH CAROLINA
STATE BOARD OF ELECTIONS

# Compliance Examination Memorandum
# Campaign Finance Disclosure Reports

| | | | |
|---|---|---|---|
| **Committee Name** | Friends of Mark Robinson | | |
| **Committee Status** | Active | **Committee Type** | Candidate |
| **Reports Covered** | 2019 Organizational – 2020 Q4 | **Examination Tier** | Tier IV |
| **Date** | September 23, 2024 | **Program Analyst** | Larimore |

## Scope

Candidate campaign committees, political committees, and referendum committees registered with the North Carolina State Board of Elections are examined to determine whether reports filed with the State Board conform to state law and the truth. N.C.G.S. § 163-278.24.

This memorandum summarizes findings made by program analysts. All committees are notified prior to publication of this memorandum of any prohibited transactions or reporting errors identified during the examination. N.C.G.S. § 163-278.23.

The scope of any examination is limited to a review of the actual reports filed with the North Carolina State Board of Elections. As part of an examination, a program analyst may request to inspect bank statements or other account information maintained by the committee's treasurer to determine conformity with state law and the accuracy of the report. N.C.G.S. § 163-278.8.

Program Analysts evaluate each report for prohibited transactions, reporting errors, and informational items. Issues identified during the examination are noted below.

For this examination, the review work was completed prior to development of the current Risk-based Review Process.

## Prohibited Transactions

Reports are checked for possible prohibited transactions. These are transactions that involve unlawful contributions or expenditures under North Carolina law. The State Board Settlement Policy will be utilized for prohibited transactions.

| **Business Contributions** | **Statutory Citation** - N.C.G.S. § 163-278.15 |
|---|---|
| Transactions Identified | • **Finemark Bank:** $100.00 on 6/13/2020<br>• **Industrial Lighting & Controls:** $100.00 on 6/14/2020<br>• **Murphy Ventures:** $4,000.00 on 6/26/2020<br>• **Cumberland REC:** As noted in Reporting Errors, Friends of Mark Robinson disclosed receipt of $250.00 on 7/15/2020. Based on research, the contributor was Cumberland Republican Building Fund committee, which cannot make contributions to Candidates. **NOTE:** Cumberland RBF received $3,250.00 in monetary business contributions during the 2020 election cycle. |
| Required Action | Each transaction is researched to determine if the contributor was reported correctly. If the committee accepts a contribution made by a corporation, business entity, labor union, professional association, or insurance company prohibited by N.C.G.S. §163-278.15, the State Board will seek a forfeiture of the contribution. If the incorrect name is recorded, the committee must provide documentation that supports a change to the contributor name, such as a copy of a check. |
| Resolution | The current committee Treasurer reviewed and reconciled the reports included in this examination to address the various mathematical errors identified in the original reports. As part of this process, supporting records were requested and produced for the cited transactions. The potential business contributions noted in this section were made through the NationBuilder platform. Information from the committee and efforts by NCSBE staff determined the following:<br>• The Finemark Bank contribution was incorrectly entered and should have been attributed to a qualifying not-for-profit – Cliff and Georgeanne Williams Family Foundation, Inc.<br>• The Industrial Lighting & Controls contribution was incorrectly entered and should have been attributed to Eugene Deloach McCurry. NCSBE staff spoke with Mr. McCurry who stated that he made a personal contribution to Friends of Mark Robinson.<br>• The Murphy Ventures transaction was incorrectly entered and should have been attributed to Jeffrey Brian Turner. NCSBE staff spoke with Mr. Turner who stated that he made a personal contribution to Friends of Mark Robinson. Mr. Turner also provided a copy of a personal credit card statement that showed a payment of $4,000.00 on 6/26/2020 to Conservative Connection – a consulting firm working with the Robinson campaign. Records from NationBuilder also show a contribution has having been successfully received by the Robinson campaign on this date.<br>No further action is required regarding these three transactions.<br><br>However, Cumberland RBF reported the receipt of monetary business contributions during the election cycle in which it gave the contribution to the Robinson committee. Prohibited transactions identified during this examination have been referred to the Legal Department. |

| **Cash Contributions over $50.00** | **Statutory Citation -** N.C.G.S. § 163-278.14 |
|---|---|
| Transactions Identified | • **ROBINSON, MARK:** $77.00 on 7/1/2019<br>• **ROBINSON, MARK:** $100.00 on 7/2/2019 |
| Required Action | Each transaction is researched to determine if the contribution was made in cash. If a cash contribution in excess of $50.00 was made, the State Board will seek forfeiture in the amount in excess of $50.00. If an incorrect form of payment is recorded on the report, documentation must be provided to support a change to the form of payment, such as a copy of a check, a recording of an electronic funds transfer, etc. |
| Resolution | Disclosure reports show two contributions from Mark Robinson to his committee in excess of the cash contribution limit. The sum of cash contributions over fifty dollars is $77.00. Prohibited transactions identified during this examination have been referred to the Legal Department. |

| **Aggregate Contributions over $50.00** | **Statutory Citation -** N.C.G.S. § 163-278.11 |
|---|---|
| Transactions Identified | 371 transactions identified totaling $10,596.00<br>*Note*: The list of these items was provided to the Committee by spreadsheet. |
| **Required Action** | **Aggregate contributions appear to have been recorded in lump sum amounts. If these contributions are appropriate to report in aggregate, they must each be listed separately on the Aggregate Contributions form. If these contributions are from a single contributor or multiple contributors in excess of $50.00 each, they must be reported on the Contributions from Individuals form. All documentation supporting either of the above changes must be provided.** |
| Resolution | The current Treasurer was able to research and reconcile these items as resulting from a known Aristotle reporting system issue that has been mentioned in previous examinations of various committees. The software continues the sum-to-date amount for aggregated reporting even though the contributor has exceeded the $50.00 threshold per election and reporting is no longer occurring in aggregated format. While there are no prohibited transactions in this category, the amount and volume of transactions noted warrant amendment of impacted reports. |

| **Anonymous Contributions** | **Statutory Citation -** N.C.G.S. § 163-278.14 |
|---|---|
| Transactions Identified | • $1,410.00 on 7/7/2020 (*form of payment listed as cash*)<br>**NOTE:** Contributor listed in reports as unknown.<br>• $25.00 on 7/7/2020 (*form of payment listed as check*)<br>**NOTE:** Contributor listed in reports as unknown.<br>• $100.00 on 8/28/2020 (*form of payment listed as check*)<br>**NOTE:** Contributor listed in reports as unknown. |
| Required Action | Reported contributions give the appearance of being from an anonymous contributor, either by direct, reported language or by the absence of a contributor name. Each transaction must be researched to determine if the contributor was reported correctly. All anonymous contributions must be forfeited pursuant to N.C.G.S. §163-278.14. If the contribution was not anonymous, documentation must be provided that discloses the contributor's name and address, such as a copy of a check, a recording of an electronic funds transfer, etc. |
| Resolution | The above three transactions totaling $1,535.00 were documented by the committee in its original reports under examination. During the reconciliation of supporting records by the current Treasurer, the $25.00 contribution and $100.00 contribution for the dates in question were identified. No further action is required regarding these two contributions totaling $125.00.<br><br>In addition to the $1,410, the committee's reconciliation of transactions indicated an additional 132 contributions for which there is insufficient information to identify the source of the contribution. Many of the 132 contributions were $50 or less. Refer to Addendum A for the list of anonymous contributions summarized by date and report. The contributions were voluntarily disclosed by the Committee to the State Board. Pursuant to G.S. 163-278.14(a), if a candidate or political committee "receives anonymous contributions . . . he shall pay the money over to the Board, by check, and all such moneys received by the Board shall be deposited in the Civil Penalty and Forfeiture Fund of the State of North Carolina." The total amount of these contributions that is subject to forfeiture is $9,915.00. Prohibited transactions identified during this examination have been referred to the Legal Department. |

| **Contributions over the Maximum Limit** | **Statutory Citation -** N.C.G.S. § 163-278.13 |
|---|---|
| Transactions Identified | • **Kirk Eskridge:** $10,800.00 on 7/22/2020<br>• **Linda Hendrick:** $6,400.00<br>  ○ $1,000.00 on 9/14/2020<br>  ○ $5,400.00 on 10/15/2020<br>• **Mary Vande Guchte:** $10,800.00 on 9/25/2020<br>*Note*: two $5,400.00 transactions were listed on this date |
| Required Action | Reported contributions appear to cause the contributor's sum to date for an election cycle to exceed the maximum contribution limit. If the contribution limit was exceeded, the State Board will seek a forfeiture of the amount contributed over the limit. If limits have not been exceeded, documentation related to the receipt of these contributions must be provided. |
| Resolution | Based on reconciliation by the current treasurer and information and disclosure reports from the committee, we have determined the following:<br>• A single $10,800.00 credit card contribution was received from Kirk Eskridge via the NationBuilder platform. The committee asserts that this transaction was intended to be split between the contributor and the spouse. However, no documentation to support this assertion was gathered by the committee at or around the time the contribution was made. The $5,400.00 in excess of the maximum contribution limit has been referred to the Legal Department.<br>• Two checks were written to the committee by Linda Hendrick. Linda Hendrick is listed for both checks totaling $6,400.00. The $1,000.00 excess greater than the maximum contribution limit has been referred to the Legal Department.<br>• Two, $5,400.00 credit card contributions were received from Mary Vande Guchte via the NationBuilder platform on 9/25/2020. The $5,400.00 in excess of the maximum contribution limit has been referred to the Legal Department. |

| **Contributions from Non-Registered Committees** | **Statutory Citation -** N.C.G.S. § 163-278.6, N.C.G.S. § 163-278.7A and N.C.G.S. § 163-278.15 |
|---|---|
| Transactions Identified | • **Liberty First Grass Roots PAC I E:** $200.00 on 9/19/2019<br>**NOTE:** PAC is registered with FEC; not registered w/ the NCSBE pursuant to N.C.G.S. § 163-278.7A<br>• **NYS RIFLE & PISTOL ASSOCIATION POLITICAL VICTORY FUND:** $500.00 on 1/16/2020 (NY State PAC)<br>• **Friends of Mia Love PAC:** $1,000.00 on 5/11/2020<br>**NOTE:** PAC is registered with FEC; not registered w/ the NCSBE pursuant to N.C.G.S. § 163-278.7A<br>• **Gun Owners of America:** $5,400.00 on 10/29/2020<br>*From GOA website*: GOA is a non-profit lobbying organization formed in 1976 to preserve and defend the Second Amendment rights of gun owners.<br>**NOTE:** PAC is registered with FEC; not registered w/ the NCSBE pursuant to N.C.G.S. § 163-278.7A<br>• **Huck PAC:** $5,400.00 on 10/19/2020<br>**NOTE:** PAC is registered with FEC; not registered w/ the NCSBE pursuant to N.C.G.S. § 163-278.7A |
| Required Action | Each transaction is researched to determine if the correct name was reported. If contributions are received from a political committee that is not registered with a Board of Elections, the State Board will seek forfeiture in the amount of the contribution. If the incorrect name is recorded, documentation supporting a change to the transaction name must be provided. |
| Resolution | Except for the NYS Rifle & Pistol Association, the contributing entities are federal political committees. Under the version of G.S. 163-278.7A in effect during the 2020 election cycle, to make contributions to North Carolina candidates and political committees, a federal political committee was required to register with the State Board of Elections and comply with reporting requirements specified by the State Board of Elections. G.S. 163-278.7A(1) and (2). The four political committees listed in this section failed to register with the State Board and file disclosure reports pursuant to G.S. 163-278.7A. The sum of the federal political committee contributions is $12,000. This has been referred to the Legal Department.<br><br>The committee understood that the NYS Rifle & Pistol Association was a not-for-profit qualified to make contributions under G.S. 163-278.19(h). However, NCSBE research indicates that the contribution was in fact from the NYS Rifle and Pistol Association Political Victory Fund ("NYS Rifle"). NYS Rifle was a political committee registered with the NY State Board of Elections (ID Number 2952). The contribution was disclosed by NYS Rifle on the New York 32-Day Pre-Primary Report. New York permits State candidates and committees to receive corporate contributions of up to $5,000 per calendar year. The State Board of Elections has not found that an out-of-state PAC that receives corporate contributions may make contributions to an NC candidate. Such a transfer would violate G.S. 163-278.19(a). The $500 from NYS Rifle has been referred to the Legal Department. |

| **Cash Expenses over $50.00.** | **Statutory Citation -** N.C.G.S. § 163-278.8 |
|---|---|
| Transactions Identified | • **NC SECU:** $160.00 on 12/2/2019<br>• **Cash Withdrawal:** $2,400.00 on 12/26/2019 |
| Required Action | Each transaction is researched to determine if the correct form of payment was reported. If a cash expenditure in excess of $50.00 was made, the State Board may assess a civil penalty. If not made in cash, documentation supporting a change to the form of payment must be provided, such as a copy of a check, a recording of an electronic funds transfer, etc. |
| Resolution | **NC SECU:** According to the committee, the Candidate used the committee debit card, rather than his personal debit card at an ATM. Committee has indicated that the Candidate is willing to reimburse the committee. However, this transaction is subject to N.C.G.S. 163-278.34(b).<br>**NOTE:** *This is the same transaction included in Expense Purposes not Justified under Statute.*<br><br>**Cash Withdrawal:** Reports disclosed a $2,400 cash withdraw on 12/26/2019. The committee stated that this disclosure was in error and the transaction was in fact a $2,400 cashier check drawn on the committee's account. The cashier check was issued to refund a previous nonprofit contribution from Balanced Nutrition. This contribution was not disclosed on previous reports. The treasurer provided a copy of the original $2,500 check from Balanced Nutrition and the $2,400 cashier check made out to Balanced Nutrition, which was signed by the candidate's wife, who is an executive with the nonprofit.<br><br>All committees are encouraged to take steps to immediately refund a prohibited contribution when identified by the treasurer while keeping accounts or filing disclosure reports. However, both the original receipt and the refund should be disclosed on the appropriate disclosure reports.<br><br>Because the original check was for $2,500, and the refund was only for $2,400, the $100 that was not refunded represents a prohibited contribution under G.S. 163-278.15. The prohibited $100 remainder has been referred to the legal department |

| **Expense Purposes are not Justified Under Statute (Candidates only)** | **Statutory Citation -** N.C.G.S. § 163-278.16B |
|---|---|
| Transactions Identified | 181 expenditures were questioned as part of this examination, based on the original purposes provided by the committee, or the lack of a purpose description. A list of these transactions was provided to the Treasurer via spreadsheet for review and response. |
| Required Action | The justification must include the purpose of the expense, how the purpose complies with N.C.G.S. §163-278.16B and must be signed by the candidate under oath. |
| Resolution | The treasurer provided updates to the purpose descriptions in response to the items questioned based on a review of the Committee's supporting records. The following expenditures do not seem to be justified for payment by the Committee and are considered prohibited uses of committee funds. These transactions have been referred to the Legal Department.<br>• **Ironwood Family Medicine:** $159.00 on 10/1/2019. The Committee self-disclosed that this transaction was a personal medical expense.<br>• **Walmart:** $77.52 on 10/23/2019. Supporting records provided by the committee indicate this was a personal medical expense.<br>• **Aggregated non-media:** $27.00 on 9/30/2020. The Committee self-disclosed that this transaction was a personal medical expense.<br>Supporting records were unavailable for the following three cash withdrawals. This is in addition to the $160 NC SECU withdrawal made on 12/2/2019 and discussed in the cash expense section as a prohibited transaction. These transactions have been referred to the Legal Department:<br>• **Cash Withdrawal:** $25.00 on 11/4/2019<br>• **Cash Withdrawal:** $42.50 on 11/18/2019<br>• **Cash Withdrawal:** $20.00 on 12/27/2019<br><br>Also included in the expenditures questioned as part of this examination were several expenditures for campaign apparel. Including, a $4,500 operating expenditure to the candidate's wife. Records provided by the committee confirm an in-kind contribution of 310 t-shirts valued at $4,505 made by the candidate's wife. The expenditure disclosed was a subsequent reimbursement of that in-kind contribution. |

## Reporting Errors

Reports were checked for the following reporting errors. Dependent on the extent of the error, the committee may be required to file amended reports.

| **Mathematical Errors** | **Statutory Citation** - N.C.G.S. § 163-278.11 |
|---|---|
| Transactions Identified | Various mathematical errors were identified for all reports reviewed. |
| Required Action | This issue covers any error with totals and beginning or ending balances. All noted transactions must be investigated, and reports amended when appropriate. Balances must track from one report to the next, with the end balance of one report carrying forward to be the beginning balance of the next report. |
| Resolution | The current Treasurer had to reconcile all the reports completed by former Treasurer's that were covered in this examination to balance the Committee's records with its bank account. Amended reports are necessary to correct these errors. |

| **Transaction Omissions, or Transactions Recorded on the Wrong Form** | **Statutory Citation** - N.C.G.S. § 163-278.11 |
|---|---|
| Transactions Identified | In addition, 33 contributions made by other registered political committees were not reported by the Robinson committee. The sum of these transactions is $38,850.00. All these contributions were confirmed with Treasurers of the contributing committees.<br><br>**Cumberland REC:** Friends of Mark Robinson disclosed receipt of $250.00 on 7/15/2020. Based on research, the contributor was Cumberland Republican Building Fund committee, which cannot make contributions to Candidates. *Refer to the Business Contributions section of this Memo under Prohibited Transactions for more details and resolution.*<br><br>Based on research, the following five checks cleared the contributing committees' bank accounts during the 2020 Q3 reporting period. The Robinson Committee did not report receiving these contributions until the 2020 Q4 reporting period.<br>• **Orange REC:** $500.00 on 10/6/2020<br>• **Beaufort REC:** $600.00 on 10/13/2020<br>• **Pamlico REC:** $1,000.00 on 10/13/2020<br>• **Sarah Stevens for NC House:** $1,000.00 on 10/14/2020 |
| Required Action | The noted transactions appear to have been omitted from the report(s) or were reported on the wrong form(s) or with the wrong transaction type. Investigate committee records to determine if these transactions occurred. Determine which transaction type is correct. |
| Resolution | With regards to the 33 unreported contributions, according to the Treasurer, the failure to disclose was due to the inexperience of the former treasurer in how donors needed to be set up in the third-party software system. Because of how they were set up in the system, the contributions were not pulled correctly into the csv file for the relevant reports.<br><br>Given the impact of these transactions of various reports and committee beginning and ending cash balances, report amendments are necessary to correct these reporting errors. |

| **Expense Purposes are not Complete or the Code is Incorrect. (all Committees)** | **Statutory Citation -** N.C.G.S. § 163-278.11 |
|---|---|
| Transactions Identified | Of the 387 expenditures reviewed during this examination, 34% had incomplete or missing purposes. A spreadsheet of these items was provided to the committee for review as part of the examination process. |
| Required Action | Expense purposes do not include enough information to determine how Committee funds were used. Additional information must be provided. |
| Resolution | After reviewing the expenditures in question, the Treasurer provided a response regarding these transactions via spreadsheet in return. Given the volume of transactions noted, report amendments are necessary to address this examination issue. |

| **48 Hour Notices** | **Statutory Citation** - N.C.G.S. § 163-278.9 and N.C.G.S. § 163-278.9A (*if examining referendum committees*) |
|---|---|
| Transactions Identified | During the 2020 general election period, 20 transactions totaling $40,848.24 were identified as not having a notice submitted to the Agency although one was required. |
| Required Action | The noted transaction(s) was recorded as received during a 48 Hour Notice period but was not reported on a 48 Hour Notice.<br>The noted transaction(s) was reported on a 48 Hour Notice but was not included on subsequent reports. Reports must be amended to include all transactions reported in a 48 Hour Notice period.<br>Information reported on a 48 Hour Notice was different when reported on the subsequent report. |
| Resolution | A list of these transactions was provided to the Committee. There is no corrective action that the Committee can take regarding these reporting errors. However, more accurate and timely reporting of large transactions before a primary or general election is necessary going forward. |

| **Joint Contributions** | **Statutory Citation -** N.C.G.S. § 163-278.14 |
|---|---|
| Transactions Identified | 21 transactions totaling $1,780.00 were reported by the Committee as having joint contributors. |
| Required Action | Contributions received from a joint account must be attributed to one individual. If the contribution is to be split, each individual must be listed separately with their address and principal occupation information and the amount of their portion of the contribution. The contribution should be attributed to the person who signed the check unless the treasurer has specific authorization from both persons whose names appear on the check to split the contribution. |
| Resolution | A list of these transactions was provided to the Committee for corrective action. Since many reports already require amendments related to this examination, these corrections should be captured when the reports are amended. |

| **Principal Occupation Information for Contributor Missing, Addresses Missing, Dates Missing or Incorrect** | **Statutory Citation -** N.C.G.S. § 163-278.11 |
|---|---|
| Transactions Identified | Of the 6,521 contributions requiring occupation information, 34% of those that did not qualify for aggregated reporting were missing at least one component of the occupation or had inappropriate terminology. |
| Required Action | A committee must report the name, complete mailing address and principal occupation of each contributor, the amount contributed, and the date the contribution was received. When a treasurer can demonstrate that the committee used the Best Efforts in 08 NCAC 21 .0101 to obtain, maintain and report the complete mailing address and principal occupation of a contributor, the committee is considered in compliance with the law. A committee may not list a contributor as retired. Please see the Campaign Finance Manual for more information on how to report a contributor's principal occupation. Treasurers must report the date each contribution was received and the date each expense was incurred. Check dates and deposit dates must not be used. The date an expense clears the bank must not be used. |
| Resolution | A list of these transactions was provided to the Committee for corrective action. Since many reports already require amendments related to this examination, these corrections should be captured when the reports are amended. In addition, the Committee provided documentation of the Best Efforts process that is followed to collect any missing information. |

| **Refund is Missing Information (such as original date/amount) or is in a Higher Amount than the Original Transaction.** | **Statutory Citation -** N.C.G.S. § 163-278.11 |
|---|---|
| Transactions Identified | **Custom Grading & Excavation, Inc:** $99.00 on 2/1/2020<br>*Note*: The original receipt was not reported. |
| Required Action | All refunds must include information about the original transactions so that program analysts can determine that no overpayment was made and that the refund was appropriate. The refund amount must not exceed the original transaction amount. |
| Resolution | During reconciliation, the current Treasurer determined that the original contribution was received on 1/15/2020. However, it was not included in the original report based on data in the Aristotle platform. No further action is required regarding this matter. |

## Contacts made with Committee:

- July 22, 2020 (*no response*)
- August 5, 2020 (*no response*)
- August 28, 2020 (*no response*)
- September 19, 2020 (*no response*)
- February 17, 2021 – emails (Ginger Kelley appointed new Treasurer as of this date)
- February 19, 2021 – emails
- February 22, 2021 – emails
- March 1, 2021 – emails
- March 2, 2021 – emails
- March 4, 2021 – emails
- March 5, 2021 – emails & call
- March 9, 2021 – emails & call
- April 7, 2021 – emails
- April 26, 2021 – emails
- May 4, 2021 – emails
- May 6, 2021 – emails
- May 7, 2021 – emails
- May 11, 2021 – call
- May 24, 2021 – emails
- July 13, 2021 – emails
- July 28, 2021 – emails
- September 17, 2021 – emails
- September 20, 2021 – emails
- October 3, 2021 - emails
- October 27, 2021 - emails
- October 27, 2021 - emails
- December 31, 2021 - emails
- January 24, 2022 – emails & call
- April 5, 2022 – emails
- May 26, 2022 – emails
- December 9, 2022 – emails
- June 15, 2023 – emails
- January 15, 2024 – emails
- February 16, 2024 – emails
- February 23, 2024 – emails
- March 7, 2024 – emails
- March 12, 2024 – emails
- March 12, 2024 – emails
- March 21, 2024 – emails
- April 1, 2024 – emails
- July 12, 2024 – emails
- July 29, 2022 – emails & call
- July 31, 2024 – emails
- August 15, 2024 – emails
- August 19, 2024 – emails

## Additional Review

The North Carolina State Board of Elections may re-open any examination or conduct an additional examination of any committee in response to any complaint or other information made available to the State Board of Elections. N.C.G.S. § 163-278.22.

# Compliance Examination Memorandum

## *Addendum A*

## Anonymous Contributions List

| Date | Contribution Count by Date | Total Amount | Form of Payment |
|---|---|---|---|
| | **2019 Year-end Semi-annual Report** | | |
| 7/19/2019 | 1 | $ 100.00 | Cash |
| 7/26/2019 | 1 | $ 80.00 | Cash |
| 7/31/2019 | 1 | $ 100.00 | Cash |
| 8/9/2019 | 1 | $ 20.00 | Cash |
| 8/12/2019 | 1 | $ 530.00 | Cash |
| 8/15/2019 | 1 | $ 100.00 | Money order |
| 9/15/2019 | 1 | $ 25.00 | Check |
| **NOTE:** | Contributor listed as Evergreen Mobile Home Park; Committee could not tie transaction back to an individual | | |
| 10/16/2019 | 1 | $ 400.00 | Cash |
| 10/22/2019 | 1 | $ 200.00 | Cash |
| 10/29/2019 | 1 | $ 75.00 | Cash |
| 11/8/2019 | 1 | $ 160.00 | Cash |
| 11/18/2019 | 1 | $ 545.00 | Cash |
| 12/19/2019 | 1 | $ 120.00 | Cash |
| **Totals** | 13 | $ 2,455.00 | |
| **by Form of Payment** | 11 | $ 2,330.00 | Cash |
| | 1 | $ 25.00 | Check |
| | 1 | $ 100.00 | Money order |

# Compliance Examination Memorandum

## *Addendum A (Continued)*

## Anonymous Contributions List

| Date | Contribution Count by Date | Total Amount | Form of Payment |
|---|---|---|---|
| | **2020 First Quarter Report** | | |
| 1/21/2020 | 1 | $ 870.00 | Cash |
| | **2020 Second Quarter Report** | | |
| *None listed* | | | |
| | **2020 Third Quarter Report** | | |
| 7/22/2020 | 1 | $ 1,410.00 | Cash |
| 8/7/2020 | 1 | $ 100.00 | Check |
| 8/7/2020 | 1 | $ 100.00 | Check |
| 8/7/2020 | 1 | $ 50.00 | Credit card |
| 8/7/2020 | 1 | $ 35.00 | Credit card |
| 8/7/2020 | 1 | $ 35.00 | Credit card |
| 8/7/2020 | 1 | $ 35.00 | Credit card |
| 8/7/2020 | 1 | $ 25.00 | Credit card |
| 8/7/2020 | 1 | $ 25.00 | Credit card |
| 8/7/2020 | 1 | $ 25.00 | Check |
| 8/7/2020 | 1 | $ 20.00 | Check |
| 8/7/2020 | 1 | $ 20.00 | Credit card |
| 8/7/2020 | 1 | $ 20.00 | Cash |
| 8/7/2020 | 1 | $ 20.00 | Cash |
| 8/7/2020 | 1 | $ 10.00 | Credit card |
| 8/7/2020 | 1 | $ 8.00 | Cash |
| 8/7/2020 | 1 | $ 5.00 | Cash |
| 8/7/2020 | 1 | $ 5.00 | Cash |
| 8/7/2020 | 1 | $ 5.00 | Cash |
| 8/7/2020 | 1 | $ 5.00 | Cash |
| 8/7/2020 | 1 | $ 5.00 | Cash |
| 8/7/2020 | 1 | $ 1.00 | Cash |
| *Subtotal* | 21 | $ 554.00 | |

# Compliance Examination Memorandum

## *Addendum A (Continued)*

## Anonymous Contributions List

| Date | Contribution Count by Date | Total Amount | Form of Payment |
|---|---|---|---|
| 8/11/2020 | 1 | $ 50.00 | Cash |
| 8/11/2020 | 1 | $ 50.00 | Cash |
| 8/11/2020 | 1 | $ 50.00 | Cash |
| 8/11/2020 | 1 | $ 50.00 | Cash |
| 8/11/2020 | 1 | $ 50.00 | Cash |
| 8/11/2020 | 1 | $ 50.00 | Cash |
| 8/11/2020 | 1 | $ 50.00 | Cash |
| 8/11/2020 | 1 | $ 50.00 | Cash |
| 8/11/2020 | 1 | $ 50.00 | Cash |
| 8/11/2020 | 1 | $ 50.00 | Cash |
| 8/11/2020 | 1 | $ 50.00 | Cash |
| 8/11/2020 | 1 | $ 50.00 | Cash |
| 8/11/2020 | 1 | $ 20.00 | Cash |
| 8/11/2020 | 1 | $ 50.00 | Cash |
| 8/11/2020 | 1 | $ 50.00 | Cash |
| 8/11/2020 | 1 | $ 50.00 | Cash |
| 8/11/2020 | 1 | $ 50.00 | Cash |
| 8/11/2020 | 1 | $ 40.00 | Cash |
| 8/11/2020 | 1 | $ 50.00 | Cash |
| 8/11/2020 | 1 | $ 50.00 | Cash |
| *Subtotal* | 19 | $ 910.00 | |
| 8/18/2020 | 1 | $ 50.00 | Cash |
| 8/18/2020 | 1 | $ 50.00 | Cash |
| 8/18/2020 | 1 | $ 50.00 | Cash |
| 8/18/2020 | 1 | $ 50.00 | Cash |
| 8/18/2020 | 1 | $ 50.00 | Cash |
| 8/18/2020 | 1 | $ 50.00 | Cash |
| 8/18/2020 | 1 | $ 50.00 | Cash |
| 8/18/2020 | 1 | $ 50.00 | Cash |
| 8/18/2020 | 1 | $ 50.00 | Cash |
| 8/18/2020 | 1 | $ 50.00 | Cash |
| 8/18/2020 | 1 | $ 10.00 | Cash |
| 8/18/2020 | 1 | $ 50.00 | Cash |
| *Subtotal* | 11 | $ 510.00 | |
| 8/25/2020 | 1 | $ 2.00 | Cash |

# Compliance Examination Memorandum

## *Addendum A (Continued)*

## Anonymous Contributions List

| Date | Contribution Count by Date | Total Amount | Form of Payment |
|---|---|---|---|
| 8/26/2020 | 1 | $ 51.00 | Check |
| 8/27/2020 | 1 | $ 40.00 | Cash |
| 8/27/2020 | 1 | $ 10.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 49.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |

# Compliance Examination Memorandum

## *Addendum A (Continued)*

## Anonymous Contributions List

| Date | Contribution Count by Date | Total Amount | Form of Payment |
|---|---|---|---|
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| 9/9/2020 | 1 | $ 50.00 | Cash |
| *Subtotal* | 41 | $ 2,049.00 | |
| 9/15/2020 | 1 | $ 25.00 | Check |
| 9/16/2020 | 1 | $ 2.00 | Cash |
| 9/17/2020 | 1 | $ 21.00 | Cash |
| 9/22/2020 | 1 | $ 35.00 | Check |
| 9/22/2020 | 1 | $ 20.00 | Check |
| 9/22/2020 | 1 | $ 3.00 | Cash |
| 9/22/2020 | 1 | $ 1.00 | Cash |
| *Subtotal* | 4 | $ 59.00 | |
| 9/24/2020 | 1 | $ 20.00 | Check |
| 9/24/2020 | 1 | $ 10.00 | Cash |
| 9/24/2020 | 1 | $ 5.00 | Cash |
| 9/24/2020 | 1 | $ 1.00 | Cash |
| *Subtotal* | 4 | $ 36.00 | |
| 9/29/2020 | 1 | $ 100.00 | Check |
| 9/30/2020 | 1 | $ 35.00 | Cash |
| 9/30/2020 | 1 | $ 50.00 | Cash |
| 9/30/2020 | 1 | $ 50.00 | Cash |
| 9/30/2020 | 1 | $ 5.00 | Cash |
| *Subtotal* | 4 | $ 140.00 | |

# Compliance Examination Memorandum

## *Addendum A (Continued)*

## Anonymous Contributions List

| Date | Contribution Count by Date | Total Amount | Form of Payment |
|---|---|---|---|
| 10/13/2020 | 1 | $ 340.00 | Cash |
| 10/13/2020 | 1 | $ 50.00 | Check |
| **Totals** | 115 | $ 6,309.00 | |
| **by Form of** | | | |
| **Payment** | 96 | $ 5,528.00 | Cash |
| | 11 | $ 546.00 | Check |
| | 8 | $ 235.00 | Credit card |
| | **2020 Fourth Quarter Report** | | |
| 10/19/2020 | 1 | $ 231.00 | Cash |
| 10/26/2020 | 1 | $ 25.00 | Check |
| 10/26/2020 | 1 | $ 25.00 | Check |
| **Totals** | 3 | $ 281.00 | |
| **by Form of** | | | |
| **Payment** | 1 | $ 231.00 | Cash |
| | 2 | $ 50.00 | Check |
| **Grand Totals** | 132 | $ 9,915.00 | |
| **by Form of** | | | |
| **Payment** | 109 | $ 8,959.00 | Cash |
| | 14 | $ 621.00 | Check |
| | 8 | $ 235.00 | Credit Card |
| | 1 | $ 100.00 | Money Order |
| | **Transactions by Size** | | |
| ≤ $50 | 114 | $ 4,534.00 | |
| $50.01 - $100 | 9 | $ 806.00 | |
| $100.01 - $250 | 3 | $ 480.00 | |
| $250.01 - $500 | 2 | $ 740.00 | |
| > $500 | 4 | $ 3,355.00 | |

| | |
|---|---|
| **Number of Days with total anonymous contributions > $50** | **23** |
| **% of All Days with anonymous contributions reported** | **77%** |