



STATE OF RHODE ISLAND BOARD OF ELECTIONS

CAMPAIGN FINANCE AUDIT

VINCENT J. BONO

CAMPAIGN FINANCE AUDIT



Audit Conducted By: Richard E. Thornton, Director of Campaign Finance

**STATE OF RHODE ISLAND
BOARD OF ELECTIONS**

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Vincent J. Bono

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INTRODUCTION

Audit Authority

Pursuant to Rhode Island General Law §17-25-5(a)(8), the Board of Elections is authorized to perform any duties that are necessary to implement the provisions of Chapter 25 of Title 17. Without limiting the generality of this provision, the Board is authorized and empowered to: Conduct compliance reviews and audits of campaign accounts as necessary, and in a manner consistent with the provisions of Chapter 25, Title 17.

Audit Purpose

Campaign Finance audits assist the Board of Elections with enforcement of campaign finance laws, provides a tool to evaluate the effectiveness of those laws and the campaign finance reporting process, verifies the accuracy and propriety of campaign finance receipts and validity and legality of campaign finance expenses and helps provide timely and accurate information to the public.

Campaign Finance audits assist and encourage candidate compliance with campaign finance reporting laws and promotes candidate accountability and integrity.

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Scope: Review campaign finance reports and supporting documentation for the period June 1, 2020 through June 30, 2021.

Methodology: Review Contributions:

- Compare contributions received to bank statement deposits
- Compare contributions received to contributions reported on campaign finance reports
- Verify there are no prohibited contributions
- Verify contributions do not exceed aggregate annual limit

Review Expenditures:

- Compare expenditures made to bank statement checks/debits
- Compare expenditures made to expenditures reported on campaign finance reports
- Verify there are no prohibited uses of campaign funds
- Verify campaign expenditures are valid and legal.

History: Vincent J. Bono ("Bono"), an unaffiliated candidate, ran unsuccessfully for State Representative in 2020.

In August 2021, the Board of Elections ("Board") initiated an audit of the campaign account of Vincent J. Bono ("Bono") pursuant to R.I.G.L. §17-25-5(a), due to Bono's failure to submit a copy of his 2020 campaign bank account statement pursuant to R.I.G.L. §17-25-11(c)(2) and failure to file two (2) campaign finance reports, required pursuant to R.I.G.L. §17-25-11(c)(1).

On September 3, 2021, the Board received via subpoena served upon the bank of Bono's campaign account, campaign depository account bank statements for the period June 1, 2020 through June 30, 2021.

Vincent J. Bono

Findings: The following are Findings of campaign finance violations discovered during the Audit Review of Bono's campaign account and supporting documentation:

Contributions:

- \$300.00 contribution was received and deposited into the campaign bank account, but not reported on the campaign finance report, in violation of R.I.G.L. §17-25-11.
- \$225.00 contribution received from one contributor, but the amount was reported on the campaign finance report without identifying the contributor, in violation of R.I.G.L. §17-25-11.

Expenditures:

- \$7,874.54 in expenditures, representing twenty-two (22) transactions, were not disclosed on campaign finance reports in violation of R.I.G.L. §17-25-11.
- \$7,611.35 in expenditures, representing six (6) transactions, were paid through a personal bank account and not through the campaign bank account, in violation of R.I.G.L. §17-25-5.2.
- \$117.31 in expenditures, representing five (5) transactions, were for personal use, in violation of R.I.G.L. §17-25-7.2.

Summary: The Audit Review of Bono's campaign account and supporting documentation for the period June 1, 2020 through June 30, 2021 demonstrates:

- With minor exception, contributions were accurately and properly reported on campaign finance reports.
- Twenty-two (22) expenditures were not disclosed on campaign finance reports.
- Six (6) expenditures were paid through a personal bank account and not through the campaign bank account.
- Five (5) expenditures were for personal use.
- Two (2) campaign finance reports were not filed.
- A copy of the 2020 campaign bank account statement was not submitted.

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Auditee Response:

- Bono acknowledges he failed to file two (2) campaign finance reports and submit a copy of his 2020 campaign bank account statement. Some campaign expenditures were paid with funds from his personal account because his campaign bank account had no remaining funds. The personal use of campaign funds was inadvertent.

Action:

Consent Order (to follow)

State of Rhode Island
Board of Elections

CONSENT ORDER

In Re: Vincent J. Bono

Vincent J. Bono ("Bono") hereby agrees to the entry of this Order and to each term and condition set forth herein:

1. At all times relevant hereto, Bono has been subject to the reporting requirements set forth in Title 17, Chapter 25 of the General Laws, pertaining to campaign contributions and expenditures.
2. In August 2021, the Board of Elections ("Board") initiated an audit of the campaign account of Bono due to Bono's failure to submit a copy of his 2020 campaign bank account statement in violation of R.I.G.L. §17-25-11(c)(2) and failure to file two (2) campaign finance reports in violation of R.I.G.L. §17-25-11(c)(1).
3. The Board conducted a full review of campaign finance reports, supporting documentation and bank records obtained via subpoena to verify the accuracy and propriety of campaign receipts and expenditures. The review determined the following:
 - With minor exception, contributions were accurately and properly reported on campaign finance reports.
 - Twenty-two (22) expenditures were not disclosed on campaign finance reports.
 - Six (6) expenditures were paid through a personal bank account and not through the campaign bank account.
 - Five (5) expenditures were for personal use.
 - Two (2) campaign finance reports were not filed.
 - A copy of the 2020 campaign bank account statement was not submitted.
4. Bono hereby acknowledges that he violated several provisions of Title 17, Chapter 25; and authorized the Board to complete his campaign finance reporting and dissolve his account on his behalf.

5. Bono hereby waives his right to any further hearing before the Board, and his right to bring any legal challenge before any state or federal court and expressly consents to a finding by the Board that his actions, as more fully described above, violate the reporting and compliance requirements of Title 17, Chapter 25.
6. Bono further consents to the entry of this Order and the imposition of a fine by the Board pursuant to R.I.G.L. §17-25-13(b), in the amount of \$2,000.00 to be paid personally by him; and consents to a forfeiture for campaign funds expended for personal use, in the amount of \$117.31 to be paid personally by him.
7. Bono hereby agrees to make the following payment of fines to the Board:
 - 1) \$2,000.00 fine to be paid personally by Vincent J. Bono by December 31, 2022; and
 - 2) \$117.31 forfeiture to be paid personally by Vincent J. Bono within thirty (30) days of the execution of this Consent Order.
8. Bono agrees to make each payment described above on or before the Due Date. In the event Bono fails to make the payment by the corresponding Due Date, the Board shall notify Bono both by U.S. Mail First Class and electronically at the residence and email address set forth below ("Delinquency Notice"). Bono shall be afforded ten (10) calendar days from the date of the Delinquency Notice to make the overdue payment. In the event the aforesaid payment is not made within the ten (10) day notice period, Bono agrees that the fine shall increase to \$4,000.00 which shall immediately become due and payable to the Board and that the Board shall refer the unpaid debt to the Department of Revenue-Central Collections Unit for collection. Bono consents to the personal jurisdiction and entry of this Order as a final judgment and waives any and all defenses that he may have to its enforcement.

The fines contained herein relate only to the violations identified in this Order and do not cover any violations not listed.

I, Vincent J. Bono, agree to each and every term set forth above and further agree to the entry of this Order.

Vincent J. Bono 12/2/2021
Vincent J. Bono Date

So entered this 16th day of December, 2021.

Diane C Mederos
Diane Mederos, Chairwoman