

STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION

In Re: **Service Employees International
Union, Local 1991**

Case No.: **FEC 13-327**

TO: Ronald G. Meyer, Esquire
Meyer, Brooks, Demma and Blohm, P.A.
P.O. Box 1547
Tallahassee, FL 32302

Miami-Dade County Supervisor of Elections
Attn: Penelope Townsley
2700 NW 87th Avenue, #100
Miami, FL 33172

NOTICE OF HEARING (AUTOMATIC FINE)

A hearing will be held in this case before the Florida Elections Commission on **October 28, 2014, at 8:30 am**, or as soon thereafter as the parties can be heard, at the following location: **Senate Office Building, Room S-110, 404 South Monroe Street, Tallahassee, FL 32399.**

Failure to appear in accordance with this notice will constitute a waiver of your right to participate in the hearing. Continuances will be granted only upon a showing of good cause.

This hearing will be conducted pursuant to Section 106.25, Florida Statutes, which governs your participation as follows:

If you are the Respondent, you may attend the hearing, and you or your attorney will have *5 minutes* to present your case to the Commission. However, some cases (including those in which consent orders or recommendations for no probable cause are being considered) may be decided by an *en masse* vote and, unless you request to be heard or the Commission requests that your case be considered separately on the day of the hearing, your case will *not* be individually heard.

If you are the Complainant, you may attend the hearing, but you will *not* be permitted to address the Commission. In addition, some cases (including those in which consent orders or recommendations for no probable cause are being considered) may be decided by an *en masse* vote and, unless the Respondent requests to be heard or the Commission requests that the case be considered separately on the day of the hearing, the case will *not* be individually heard.

If you are an Appellant, and you have requested a hearing, you may attend the hearing, and you or your attorney will have *5 minutes* to present your case to the Commission.

Please be advised that both confidential and public cases are scheduled to be heard by the Florida Elections Commission on this date. As an Appellant, Respondent or Complainant in one case, you will *not* be permitted to attend the hearings on other confidential cases.

The Commission will electronically record the meeting. Although the Commission's recording is considered the official record of the hearing, the Respondent may provide, at his own expense, a certified court reporter to also record the hearing.

If you require an accommodation due to a disability, contact Donna Malphurs at (850) 922-4539 or by mail at 107 West Gaines Street, The Collins Building, Suite 224, Tallahassee, Florida 32399, at least 5 days before the hearing.

See further instructions on the reverse side.

Amy McKeever Toman
Executive Director
Florida Elections Commission
October 13, 2014

Please refer to the information below for further instructions related to your particular hearing:

If this is a hearing to consider **an appeal from an automatic fine**, the Filing Officer has imposed a fine on you for your failure to file a campaign treasurer's report on the designated due date and, by filing an appeal, you have asked the Commission to consider either (1) that the report was in fact timely filed; or (2) that there were unusual circumstances that excused the failure to file the report timely. You are required to prove your case. If the Commission finds that the report was filed timely or that there were unusual circumstances that excused the failure, it may waive the fine, in whole or in part. The Commission may reduce a fine after considering the factors in Section 106.265, Florida Statutes. If the Commission finds that the report was not timely filed and there were no unusual circumstances, the fine will be upheld.

If this is a hearing to consider a **consent order before a determination of probable cause has been made**, the Commission will decide whether to accept or reject the consent order. If the Commission accepts the consent order, the case will be closed and become public. If the Commission rejects the consent order or does not make a decision to accept or deny the consent order, the case will remain confidential, unless confidentiality has been waived.

If this is a hearing to consider a **consent order after a determination of probable cause has been made**, the Commission will decide whether to accept or reject the consent order. If the Commission accepts the consent order, the case will be closed. If the Commission rejects the consent order or does not make a decision to accept or deny the consent order, the Respondent will be entitled to another hearing to determine if the Respondent committed the violation(s) alleged.

If this is a **probable cause hearing**, the Commission will decide if there is probable cause to believe that the Respondent committed a violation of Florida's election laws. Respondent should be prepared to explain how the staff in its recommendation incorrectly applied the law to the facts of the case. *Respondent may not testify, call others to testify, or introduce any documentary or other evidence at the probable cause hearing.* The Commission will only decide whether Respondent should be *charged* with a violation and, before the Commission determines whether a violation has occurred or a fine should be imposed, Respondent will have an opportunity for another hearing at which evidence may be introduced.

If this is an **informal hearing**, it will be conducted pursuant Sections 120.569 and 120.57(2), Florida Statutes; Chapter 28 and Commission Rule 2B-1.004, Florida Administrative Code. At the hearing, the Commission will decide whether the Respondent committed the violation(s) charged in the Order of Probable Cause. The Respondent will be permitted to testify. However the Respondent may not call witnesses to testify.

Respondent may argue why the established facts in the Staff Recommendation do not support the violations charged in the Order of Probable Cause. At Respondent's request, the Commission may determine whether Respondent's actions in the case were willful. The Respondent may also address the appropriateness of the recommended fine. If Respondent claims that his limited resources make him unable to pay the statutory fine, *he must provide the Commission with written proof of his financial resources* at the hearing. A financial affidavit form is available from the Commission Clerk.

**FLORIDA ELECTIONS COMMISSION
CASE REPORT**

Case Number: **FEC-13-327**

NAME: **SERVICE EMPLOYEES INTERNATIONAL UNION, LOCAL 1991**

DATE APPEAL RECEIVED: 12/20/13

DATE HEARD BY FEC: N/A

DATE HEARING REQUEST RECEIVED: 12/20/13

DATE REPORT DUE: 10/10/13 (2013 Q3)

DATE OF ELECTRONIC RECEIPT: 11/13/13

DATE FILING OFFICER RECEIVED REPORT: 11/13/13

NUMBER OF DAYS LATE: 34

AMOUNT OF FINE: \$7,000.00

FINE BASED ON: () NUMBER OF DAYS () 25% OF RECEIPTS (X) 25% OF EXPENDITURES

TOTAL RECEIPTS FOR REPORTING PERIOD: \$0

TOTAL EXPENDITURES FOR REPORTING PERIOD: \$28,000.00

DATE FIRST NOTIFICATION WAS SENT: 12/2/13

CANDIDATE []	STATE []
PC []	DISTRICT []
CCE []	COUNTY [X]
POLITICAL PARTY []	CITY []
IXO [X]	

SUMMARY: Service Employees International Union Local 1991 is a political committee (PC) registered in the County of Miami-Dade. The PC retained Ronald G Meyer to represent them in this matter.

The PC is appealing the fine claiming that unusual circumstances existed, "where the omissions of the accountants should not penalize the Respondent which made every reasonable effort to ensure that the proper and timely compliance would take place". According to Mr Meyer, "The Respondent, in late September, 2013, determined to make independent expenditures in support of a ballot referendum to support issuance of bonds for increased funding for the Jackson Hospital in Miami. This was the first time the Respondent participated in making independent expenditures. Accordingly, the Respondent sought legal guidance and the recommendation of a qualified accounting firm which could perform election compliance. It selected the accounting firm of Carr Riggs & Ingram LLC in Tallahassee to advise and assist it in making required reports. At the same time, the Respondent sought accounting assistance for its political committee, Community Healthcare PC, which it had recently established as a result of the changes to the election laws required the dissolution of its prior committee of continuous existence. It also discussed with the accountants the compliance requirements that the PC had under the amended statutes. This is a circumstance where, through no fault of the Respondent, the qualified professional who was engaged to prepare and electronically file the reports failed to do so. The Respondent was unaware of the failure until its receipt of the letter dated December 2, 2013, when it learned that fines, totaling \$17,637.05 were imposed against it"

PRIOR CASES: This IXO has two other automatic-fine cases appearing before the Commission during this October 2014 Commission meeting: FEC 13-328 and 13-329

PHONE LOG
Case No.: FEC 13-327

Respondent: Service Employees International Union, Local 1991

2. **Date and time:** March 28, 2014 @ 2:35 pm
Name: Penelope Townsley/Vanessa Innocent—FO
Phone #: (305) 499-8342
Summary: I attempted telephone contact to request registration documents. I left a message to return my call
Entered by: CKO

3. **Date and time:** March 28, 2014 @ 3:00 pm
Name: Vanessa Innocent—FO
Phone #: (305) 499-8342
Summary: I had telephone contact to request registration documents pertaining to Respondent. I was advised that the union contacted the SOE office because they wanted to file reports. Ms. Innocent states that they were not aware of the union prior to them initially making contact with her office. I requested that she send me all of the information pertaining to Respondent including prior reports. She stated that there wasn't much besides an email but she would forward me the information.
Entered by: CKO

4. **Date and time:** June 11, 2014 @ 10:15 am
Name: Dwight Daney—City Attorney for Miami-Dade
Phone #: (305) 250-5358
Summary: I made contact with Mr. Daney. Mr. Daney didn't have any other information to provide to FEC staff concerning this union.
Entered by: CKO

5. **Date and time:** June 26, 2014 @ 11:00 am
Name: Ron Meyer—Attorney
Phone #: (850) 878-5212
Summary: I attempted telephone contact to inquire about Respondent. I left a message to return my call
Entered by: CKO

6. **Date and time:** June 30, 2014 @ 3:45 p.m.
Name: Ron Meyer—Attorney
Phone #: (850) 878-5212
Summary: Mr. Meyer informed FEC staff that the IXO did not file any registration documents. Mr. Meyer explained that the independent expenditure organization was not required to complete this task. He states that the union is made up of nurses/healthcare professionals from a hospital in Miami. He also informed FEC staff that Carr Riggs & Ingram were the accountants that completed all of the reports for the union, and they had dropped the ball on filing this report. Mr. Meyer states that the accountants were informed of the requirement to file this report while submitting a report for the related PC. He states

that no failure-to-file letters were received informing them of overdue report because no registration information was filed. He also advised that representatives from the union contacted the Miami-Dade SOE on 11/8/13 to request log-in credentials so that they could file their reports. On 11/12/13, the union received their log-in credentials and began filing these reports.

Entered by: CKO

7. **Date and time:** July 17, 2014 @ 9:00 am

Name: Ron Meyers—Attorney

Phone #: (850) 878-5212

Summary: I had telephone contact to get an update on when overdue additional information would be received, and to inform him that this case had been rescheduled to be heard during the October Commission meeting. Mr. Meyers states that he is still gathering information from the union before sending information to the FEC. Mr. Meyers states that the union contacted the FO prior to November 12 but didn't receive log in credentials until November 12. Mr. Meyers reiterated that the accountants were still completing reports using the PC schedule and were not aware that the IXO needed to file reports because of a special election. All reports were filed on November 12. Mr. Meyers states that he will forward information to my attention.

Memo to File? No

Entered by: CKO

8. **Date and time:** July 17, 2014 @ 9:30 am

Name: Vanessa Innocent—FO

Phone #: (305) 499-8342

Summary: I had telephone contact to verify that I have all information pertaining to the union and to clarify when initial contact was made between the union and the FO office. Ms. Innocent states that I have all of the information pertaining to the union. I inquired about any additional notes. Ms. Innocent states that she will print out all of the notes and send them to my attention to ensure that I have everything. Ms. Innocent also verified that initial contact was made by the union contacting the FO office requesting log in credentials in order to file reports. I thanked her for her assistance in this matter.

Memo to File? No

Entered by: CKO

MEYER, BROOKS, DEMMA AND BLOHM, P.A.
ATTORNEYS AT LAW

131 NORTH GADSDEN STREET
TALLAHASSEE, FLORIDA 32301
www.meyerbrookslaw.com
850/878-5212

RONALD G MEYER
THOMAS W BROOKS*
ANTHONY D DEMMA
JENNIFER S BLOHM
PATRICIA A DRAPER
LYNN C HEARN
MARTIN F POWELL

ALEX VILLALOBOS
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TALLAHASSEE, FLORIDA 32302
FAX: 850/656-6750
EMAIL: rmeyer@meyerbrookslaw.com

*Board Certified in Labor and Employment Law
*Certified Circuit Mediator

August 8, 2014

LYNN I THOMAS, FRP
PARALEGAL

Jaakan Williams, Esquire
Assistant General Counsel
Florida Elections Commission
107 W Gaines Street, Ste 224
Tallahassee, FL 32399-6549

Re: FEC v. SEIU Local 1991 - FEC 13-³²⁷~~27~~, 13-328 and 13-329

Dear Mr. Williams:

I have enclosed the original of the affidavit of Martha Baker, President of SEIU Local 1991. I have previously provided a scanned copy via e-mail.

Thank you for your assistance in resolving this matter. If we can provide any further information, please let me know.

Sincerely yours,



Ronald G. Meyer

Enclosure

RECEIVED
2014 AUG 13 A 9:33
STATE OF FLORIDA
ELECTIONS COMMISSION

STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION

RECEIVED

2014 AUG 13 A 9:34

STATE OF FLORIDA
ELECTIONS COMMISSION

Florida Elections Commission,
Petitioner,

v.

Agency Case Nos.: FEC 13-327, 13-328
and 13-329

Service Employees International Union,
Local 1991,
Respondent.

AFFIDAVIT

BEFORE ME, the undersigned authority, did personally appear Martha Baker, R.N. who, upon having first been duly sworn, did depose and state as follows:

1 I am the President of the Service Employees International Union (SEIU) Local 1991. I am making this affidavit of my own personal knowledge.

2 Attached hereto and incorporated herein are three letters which are dated December 2, 2013, which I received within a few days thereof, advising me that certain reports had been filed late and fines were being imposed. The December 2, 2013, notices are the first and only notification that I or other employees of the SEIU Local 1991 received relating to any problem associated with the filing of campaign reports.

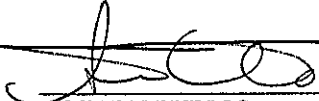
3 In October, 2013, SEIU Local 1991 engaged the accounting firm of Carr Riggs & Ingram LLC to prepare reports for filing in conjunction with Local 1991's election activities. Representatives of Local 1991 provided the accountants with information requested by the accountants for filing reports and were not advised that any additional information was required.

FURTHER YOUR AFFIANT SAYETH NAUGHT.


MARTHA BAKER, R.N.

SWORN to and SUBSCRIBED before me on this

31st day of July, 2014


NOTARY PUBLIC

My Commission Expires:

Personally Known

Identification Produced Type of Identification _____





miamidade.gov

Elections
2700 NW 87th Avenue
Miami, Florida 33172
T 305-499-8683 F 305-499-8547
TTY 305-499-8480

December 2 2013

Martha Baker
18441 NW 2nd Avenue
Suite 502
Miami Gardens, FL 33169

NOTICE OF LATE FILING – FINE DUE – \$7,000.00
Service Employees International Union Local 1991 IXO
Q3-13 Campaign Treasurer's Report
Due Date: 10/10/2013
Period Covered: 7/1/2013 – 9/30/2013

Dear Ms Baker,

The Q3-13 Campaign Treasurer's Report filed with our office was submitted on 11/13/2013. Since this report was not filed by the appropriate filing date, a fine is being assessed for each late day pursuant to Florida Statute 106 07(8)(b).

As such, fines are calculated at a rate of \$50.00 per day for the first 3 days and thereafter, \$500.00 per day for each late day. These fines are not to exceed 25% of the total receipts or expenditures, whichever is greater, for the period covered by the late report. Therefore, since the report was 34 days late, the fine is \$7,000.00, which is 25% of your total expenditures of \$28,000.00. Said fine must be received by our office at 2700 NW 87th Avenue, Miami, FL 33172 within twenty (20) days of your receipt of this notice. The check should be made payable to Miami-Dade County.

Florida Statute 106 07(8)(b) goes on to say that the fine may be appealed or disputed based upon unusual circumstances surrounding the failure to file by the designated due date. A hearing before the Florida Elections Commission may be requested, which shall have the authority to waive the fine in part or whole. Any such request must be submitted in writing and must be received by the Florida Elections Commission within 20 days of your receipt of this notice. To request an appeal, please write to the Florida Elections Commission, 107 West Gaines Street, Collins Building, Suite 224, Tallahassee, FL 32399-1050. Our office must also be notified of the intent to bring this matter before the Commission.

I urge you to promptly resolve this matter. If not, in accordance with Florida Statute 106 07(8)(d), we will be required to notify the Florida Elections Commission of this late filing and failure to pay the imposed fine.

If you have any questions regarding this matter, please contact the Candidate Services Unit at 305-499-8410.

Sincerely,

Carolina D. Lopez
Deputy Supervisor of Elections
Miami-Dade Elections Department

Certified No: 7012 0470 0001 2807 1592

MEYER, BROOKS, DEMMA AND BLOHM, P.A.
ATTORNEYS AT LAW

13-327

131 NORTH GADSDEN STREET
TALLAHASSEE, FLORIDA 32301
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LYNN C. HEARN
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ALEX VILLALOBOS
OF COUNSEL

RECEIVED
2013 DEC 20 2 20 PM
STATE OF FLORIDA
ELECTIONS COMMISSION
MAILING ADDRESS:
POST OFFICE BOX 1547
TALLAHASSEE, FLORIDA 32302
FAX: 850/656-6750
EMAIL: rmeyer@meyerbrookslaw.com

*Board Certified in Labor and Employment Law
*Certified Circuit Mediator

LYNN T. THOMAS, FRP
PARALEGAL

December 20, 2013

VIA HAND DELIVERY

Ms. Amy McKeever Toman, Executive Director
Florida Elections Commission
107 West Gaines Street
Collins Building, Suite 224
Tallahassee, Florida 32399-1050

Re: Notice of Appeal –Service Employees International Union, Local 1991 Auto-Fines

Dear Ms Toman:

This letter is to notify the Commission pursuant to subsection 106 04(8), Florida Statutes, and Rule 2B-1.005, Fla. Admin. Code, that Martha Baker, President of the Service Employees International Union, Local 1991, by these presents appeals the three auto-fines assessed by the Miami-Dade Elections Department in the total amount of \$17,637 05, for the Q3-13, NS1-13 and NS2-13 independent expenditure reports which became due on October 10, 2013, October 18, 2013 and November 1, 2013, respectively.

Copies of the notices from the Miami-Dade Elections Department imposing the fines are attached. The Service Employees International Union, Local 1991, respectfully requests a hearing before the Commission on these matters.

If you have any questions or require any additional information at this time, please do not hesitate to contact me

Sincerely,



Ronald G. Meyer

Enclosures

cc: Ms. Penelope Townsley
Miami-Dade County Supervisor of Elections

STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION

(CO)

RECEIVED

Florida Elections Commission,
Petitioner,

2014 JAN 30 A 11: 07

v.

STATE OF FLORIDA
ELECTIONS COMMISSION
Agency Case Nos.: FEC 13-327, 13-328 and 13-329

Service Employees International Union,
Local 1991,
Respondent.

RESPONDENT'S MEMORANDUM IN SUPPORT OF APPEAL OF AUTOFINES

The Service Employees International Union Local 1991 (hereinafter "Respondent") tenders this memorandum in support of its appeal of the automatic fines which were levied against it by the Miami-Dade Elections Department in Cases Nos: FEC 13-327, 328 and 329. The unusual circumstances warranting the fines to be set aside are the same in each of the cases. Accordingly, we are filing this consolidated memorandum.

The Respondent, in late September, 2013, determined to make independent expenditures in support of a ballot referendum to support issuance of bonds for increased funding for the Jackson Hospital in Miami (which passed by 65% of the vote). This was the first time the Respondent participated in making independent expenditures. Accordingly, the Respondent sought legal guidance and the recommendation of a qualified accounting firm which could perform election compliance. It selected the accounting firm of Carr Riggs & Ingram LLC in Tallahassee to advise and assist it in making required reports.

At the same time, the Respondent sought accounting assistance for its political committee, Community Healthcare PC, which it had recently established as a result of the changes to the election laws requiring the dissolution of its prior committee of continuous existence. It also discussed with the accountants the compliance requirements that the PC had under the amended statutes.

This is where the problem occurred. Through no fault of the Respondent, the accountants confused the reporting required of the PC (the next report, the M10 spanning the month of October, fell due on November 12, 2013) with the reporting required of an organization making independent expenditures in a municipal election (in this instance, the requirement to file three expenditure reports – the Q3-13, NS1-13 and NS2-13) with the local filing officer. It was not until the accountants were preparing the M10 (believing that the independent expenditures were being made by the Community Healthcare PC), that they learned that it was actually the Respondent as an IXO (independent expenditure organization) which was required to disclose the expenditures. At that time, the accountants (but not the Respondent) learned that the reports were due on October 10, October 18 and November 1, 2013). Upon learning this, the accountants filed the NS1-13 and NS2-13 on November 12 and the Q3-13 on November 13, 2013. However, it was not until it received the letters dated December 2, 2013, the notices of late filing, that the Respondent became aware of the reporting omissions.

The Respondent acted fully in good faith and with the belief (albeit mistaken) that the professionals it had hired to perform required compliance, had done what they were engaged to do. It became the perfect storm; the information which was needed for the reports was being assembled to be used in preparing the PC's M10 report which wasn't due until November 12, 2013. Accordingly, there was no red flag or cause for the Respondent to believe that the correct,

timely reports were not being prepared and filed; the information was flowing to the accountants when they requested it and the accountants were of the apparent belief that the report was required to be filed by November 12, 2013, with the Division of Elections; a correct belief if it had in fact been the PC making the expenditures

This is a circumstance where, through no fault of the Respondent, the qualified professional who was engaged to prepare and electronically file the reports failed to do so. The Respondent was unaware of the failure until its receipt of the letter dated December 2, 2013, when it learned that fines, totaling \$17,637.05 were imposed against it.

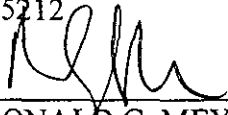
We submit that the foregoing constitutes "unusual circumstances" warranting the fines to be set aside. This is a circumstance where the omissions of the accountants should not penalize the Respondent which made every reasonable effort to ensure that proper and timely compliance would take place.

The Respondent respectfully requests the entry of an order upholding the appeal and setting aside the fines which have been imposed.

Submitted this 28th day of January, 2014

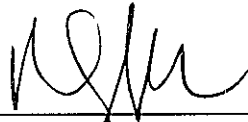
MEYER, BROOKS, DEMMA AND BLOHM, P.A.
131 North Gadsden Street
Post Office Box 1547 (32302)
Tallahassee, Florida 32301
850/878-5212

By: _____


RONALD G MEYER

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Memorandum has been served by First Class U.S. Mail on David Grossman, Esquire, Assistant General Counsel, Florida Elections Commission, 107 West Gaines Street, Suite 224, Collins Building, Tallahassee, Florida 32399-1050 this 28th day of January, 2014.



RONALD G. MEYER

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

**Florida Elections Commission,
Petitioner,**

v.

**Agency Case Nos.: FEC 13-327, 13-328
and 13-329**

**Service Employees International Union,
Local 1991,
Respondent.**

AFFIDAVIT

BEFORE ME, the undersigned authority, did personally appear Martha Baker, R.N. who, upon having first been duly sworn, did depose and state as follows:

1. I am the President of the Service Employees International Union (SEIU) Local 1991. I am making this affidavit of my own personal knowledge.
2. Attached hereto and incorporated herein are three letters which are dated December 2, 2013, which I received within a few days thereof, advising me that certain reports had been filed late and fines were being imposed. The December 2, 2013, notices are the first and only notification that I or other employees of the SEIU Local 1991 received relating to any problem associated with the filing of campaign reports.
3. In October, 2013, SEIU Local 1991 engaged the accounting firm of Carr Riggs & Ingram LLC to prepare reports for filing in conjunction with Local 1991's election activities. Representatives of Local 1991 provided the accountants with information requested by the accountants for filing reports and were not advised that any additional information was required.

FURTHER YOUR AFFIANT SAYETH NAUGHT.


MARTHA BAKER, R.N.

SWORN to and SUBSCRIBED before me on this

31st day of July, 2014.



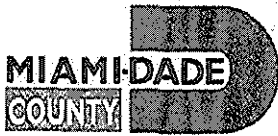
NOTARY PUBLIC

My Commission Expires:

Personally Known

Identification Produced Type of Identification _____





miamidade.gov

Elections
2700 NW 87th Avenue
Miami, Florida 33172
T 305-499-8683 F 305-499-8547
TTY 305-499-8480

December 2, 2013

Martha Baker
18441 NW 2nd Avenue
Suite 502
Miami Gardens, FL 33169

NOTICE OF LATE FILING – FINE DUE – \$7,000.00
Service Employees International Union Local 1991 IXO
Q3-13 Campaign Treasurer's Report
Due Date: 10/10/2013
Period Covered: 7/1/2013 – 9/30/2013

Dear Ms Baker,

The Q3-13 Campaign Treasurer's Report filed with our office was submitted on 11/13/2013. Since this report was not filed by the appropriate filing date, a fine is being assessed for each late day pursuant to Florida Statute 106.07(8)(b)

As such, fines are calculated at a rate of \$50 00 per day for the first 3 days and thereafter, \$500 00 per day for each late day. These fines are not to exceed 25% of the total receipts or expenditures, whichever is greater, for the period covered by the late report. Therefore, since the report was 34 days late, the fine is \$7,000 00, which is 25% of your total expenditures of \$28,000 00. Said fine must be received by our office at 2700 NW 87th Avenue, Miami, FL 33172 within twenty (20) days of your receipt of this notice. The check should be made payable to Miami-Dade County.

Florida Statute 106.07(8)(b) goes on to say that the fine may be appealed or disputed based upon unusual circumstances surrounding the failure to file by the designated due date. A hearing before the Florida Elections Commission may be requested, which shall have the authority to waive the fine in part or whole. Any such request must be submitted in writing and must be received by the Florida Elections Commission within 20 days of your receipt of this notice. To request an appeal, please write to the Florida Elections Commission, 107 West Gaines Street, Collins Building, Suite 224, Tallahassee, FL 32399-1050. Our office must also be notified of the intent to bring this matter before the Commission.

I urge you to promptly resolve this matter. If not, in accordance with Florida Statute 106.07(8)(d), we will be required to notify the Florida Elections Commission of this late filing and failure to pay the imposed fine.

If you have any questions regarding this matter, please contact the Candidate Services Unit at 305-499-8410.

Sincerely,

Carolina D. Lopez
Deputy Supervisor of Elections
Miami-Dade Elections Department

Certified No: 7012 0470 0001 2807 1592

**FLORIDA DEPARTMENT OF STATE DIVISION OF ELECTIONS
CAMPAIGN TREASURER'S REPORT SUMMARY**

(1) (IXO) Service Employees International Union
Name
 (2) 18441 NW 2 Avenue
Address (number and street)
Miami Gardens, FL 33169
City, State, Zip Code

OFFICE USE ONLY
ONLINE SUBMISSION
 [1057047]
 Submitted on:
 11/13/2013 16:18:08 (eastern)

CHECK IF ADDRESS HAS CHANGED

(3) ID Number: 1275

(4) Check appropriate box(es):

- Candidate (office sought): _____
- Political Committee CHECK IF PC HAS DISBANDED
- Committee of Continuous Existence CHECK IF CCE HAS DISBANDED
- Party Executive Committee
- Electioneering Communication CHECK IF NO OTHER ELECTIONEERING COMMUNICATION REPORTS WILL BE FILED

(5) REPORT IDENTIFIERS

Cover Period: From 7/1/2013 To 9/30/2013 Report Type Q3-13
 Original Amendment Special Election Report Independent Expenditure Report

(6) CONTRIBUTIONS THIS REPORT

Cash & Checks \$ 0.00

Loans \$ 0.00

Total Monetary \$ 0.00

In-Kind \$ 0.00

(7) EXPENDITURES THIS REPORT

Monetary Expenditures \$ 28,000.00

Transfers to Office Account \$ 0.00

Total Monetary \$ 28,000.00

(8) Other Distributions \$ 0.00

(9) TOTAL Monetary Contributions To Date
 \$ 0.00

(10) TOTAL Monetary Expenditures To Date
 \$ 126,828.79

(11) CERTIFICATION

It is a first degree misdemeanor for any person to falsify a public record (ss. 839.13, F.S.)

I certify that I have examined this report and it is true, correct, and complete.

(Type name)

Individual (only for electioneering commun) Treasurer Deputy Treasurer

X

Signature

I certify that I have examined this report and it is true, correct, and complete.

(Type name)

Candidate Chairperson (only for PC, PTY & electioneering commun organization)

X

Signature

CAMPAIGN TREASURER'S REPORT – ITEMIZED CONTRIBUTIONS

(1) Name (IXO) Service Employees International Union Local 1991 (2) I.D. Number 1275
 7/1/2013 through 9/30/2013
 (3) Cover Period / / through / / (4) Page 1 of 0

(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Contributor Type Occupation		(9) Contribution Type	(10) In-kind Description	(11) Amendment	(12) Amount
(6) Sequence Number		Type	Occupation	Type	Description		Amount
/ /							
/ /							
/ /							
/ /							
/ /							
/ /							
/ /							

CAMPAIGN TREASURER'S REPORT - ITEMIZED EXPENDITURES

(1) Name (IXO) Service Employees International Union Local 1991 (2) I.D. Number 1275
 (3) Cover Period 7/1/2013 through 9/30/2013 (4) Page 1 of 1

(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Purpose (add office sought if contribution to a candidate)	(9) Expenditure Type	(10) Amendment	(11) Amount
9/17/2013 //	Frederick Polls, 2101 Wilson Blvd, Ste 104 Arlington, VA 22201	survey	MO		\$28,000.00
1					
//					
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**Candidate : (IXO) Service Employees
International Union Local 1991
Office : Independent Expenditure Organization**

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[Export these transactions \(tab delimited - .csv\)](#)

Report Date : ALL								
Campaign Treasurer's Report - Itemized Contributions								
Seq Num	Date	Contributor	Contributor Type	Occupation	Contribution Type	In-Kind Description	Amend	Amount
No Activity This Period								
							Total Contributions	\$0.00
Campaign Treasurer's Report - Itemized Expenditures								
Seq Num	Date	Vendor	Purpose	Expenditure Type	Amend	Amount		
1	10/3/2013	Aerial Banners 601 SW 77th Way Pembroke Pines, FL 33023	Ariel Banner for Bond Campaign	Monetary		\$790.00		
2	10/3/2013	Clear Channel Outdoor 5800 NW 77th Circle Miami, FL 33166	Digital Bulletin Network Advertising	Monetary		\$10,400.00		
3	10/7/2013	50 Blue LLC 7525 SW 54th Court Miami, FL 33143	CAMPAIGN PLEDGE CARDS	Monetary		\$1,455.20		
4	10/9/2013	Aerial Banners 601 SW 77th Way Pembroke Pines, FL 33023	10/20/13 Aerial Banner - Bond Campaign	Monetary		\$395.00		
5	10/9/2013	Fiesta Carousel 3750 West 16th Ave, #302 Hialeah, FL 33012	CAMPAIGN BBQ EVENT	Monetary		\$1,158.00		
6	10/9/2013	Gade Tet Ou PO Box 565853 Miami, FL 33256	RADIO SPOTS	Monetary		\$6,000.00		
7	10/9/2013	Jarvis Perkins 10401 NW 25th Ave Miami, FL 33148	DJ FOR BBQ EVENT	Monetary		\$350.00		
8	10/18/2013	50 Blue LLC 7525 SW 54th Court MIAMI, FL 33143	Stickers, Logo, postcards	Monetary		\$29,622.50		
9	10/18/2013	Aerial Banners 601 SW 77th Way Pembroke Pines, FL 33023	10/20/13 Aerial Banner - Bond Campaign	Monetary		\$395.00		
10	10/18/2013	Jarvis Perkins 10401 NW 25th Ave MIAMI, FL 33148	Additional helium tanks for BBQ Event	Monetary		\$100.00		
11	10/18/2013	New Birth Broadcasting Corpora 13242 NW 7th Ave MIAMI, FL 33168	RADIO SPOTS	Monetary		\$5,000.00		

12	10/18/2013	Silvia Ros 249 NW 91 Street Miami Shores, FL 33150	PHOTOGRAPHY SERVICES	Monetary		\$700 00
13	10/23/2013	Frederick Polls 2101 Wilson Blvd, Ste 104 Arlington, VA 22201	SURVEY	Monetary		\$8,500 00
14	10/23/2013	Rogelio Abreu 18441 NW 2nd Avenue, Ste 502 Miami Gardens, FL 33169	CAMPAIGN SIGNS	Monetary		\$1,000 00
15	10/30/2013	Creative Ideas Advertising 3175 SW 8th Street MIAMI, FL 33135	MEDIA	Monetary		\$29,206 00
16	10/30/2013	The Winding Creek Group 18118 Chesterfield Airport Rd, Ste-1 Chesterfield, MO 63005	TOWNHALL MEETING	Monetary		\$3,700 00
17	10/23/2013	Ron Bilbao 777 NE 62nd Street, #C-112 Miami, FL 33138	Dolphin Tailgate	Monetary		\$57 09
18	9/17/2013	Frederick Polls 2101 Wilson Blvd, Ste 104 Arlington, VA 22201	Survey	Monetary		\$28,000 00
19	11/6/2013	Daniel's Offset Printing 19085 W. Dixie Highway North Miami Beach, FL 33180	Bond campaign literature	Monetary		\$1,172 72
20	11/21/2013	Daniel's Offset Printing 19085 W. Dixie Highway North Miami Beach, FL 33180	Bond campaign literature	Monetary		\$1,102 26
21	11/6/2013	SEIU-CC, LLC 330 W. 42nd St., 7th Flr New York, NY 10036	Phone banking (robocalls)	Monetary		\$81 36
22	11/13/2013	SEIU-CC, LLC 330 W. 42nd St., 7th Flr New York, NY 10036	Phone banking (robocalls)	Monetary		\$265 44
23	11/21/2013	Rebeca Sosa Campaign 1000 SW 57th Ave, Suite 201 Miami, FL 33144	Campaign Contribution	Monetary		\$500 00
					Total Expenditures:	\$129,950.57

Campaign Treasurer's Report - Fund Transfers

Seq Num	Date	Institution	Transfer Type	Nature of Account	Amend	Amount
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No Activity This Period

Campaign Treasurer's Report - Distributions

Seq Num	Date	Vendor	Purpose	Expenditure Related Exp	Amend	Amount
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No Activity This Period

* Petty cash expenditures are realized when the funds are withdrawn for petty cash. Therefore, the referenced item is not included in the total.

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RE: Service Employees International Union Local 1991 - Documents requested

Innocent, Vanessa (Elections) to: Cedric Oliver

04/01/2014 01:09 PM

Cc: "Lopez, Carolina D. (Elections)", "Acosta, Maria (Elections)"

Good afternoon Cedric,

To assist you in your investigative process, in addition to the documents I sent you on Friday, I also attaching the initial email string where the Service Employees International Union Local 1991 requested access to file independent expenditure expenses in Miami-Dade County

Once you have the date of the hearing could you please let us know for we can document our file.

If you need additional information, please do not hesitate to contact our office.

Sincerely,

Vanessa Innocent
Elections Department

(305) 499-8342

www.miamidade.gov

"Delivering Excellence Every Day"

From: Innocent, Vanessa (Elections)

Sent: Friday, March 28, 2014 4:52 PM

To: 'Cedric Oliver'

Cc: Lopez, Carolina D. (Elections); Acosta, Maria (Elections)

Subject: Service Employees International Union Local 1991 - Documents requested

Importance: High

Good afternoon Cedric,

Per your request, attached please find the documents for the Service Employees International Union Local 1991 As I mentioned they did not have filing documents per say since they are not a committee or candidate.

Should you need any additional information, please feel free to contact our office

Sincerely,

Vanessa Innocent
Elections Department

(305) 499-8342

www.miamidade.gov

"Delivering Excellence Every Day"

Message from "Acosta, Maria (Elections)" <SOEMACO@miamidade.gov> on Tue, 12 Nov 2013 -----
----- 0000+ 18:00:57

<Lorie Frederick <lfrederick@cricpa.com :To
"(Innocent, Vanessa (Elections)"
<INNOCEN@miamidade.gov> :cc

RE: Miami Dade Supervisor of Election **Subject** :

Good afternoon,

Below is the information that you will need to do the reports, per our telephone conversation you told me that the 1st expenditure was done about October 3rd, based on that information you will need to do the NS1-1 and NS2-1 reports. If you have any expenditures on or after November 1st, also do the report M11-1.

- Log-in ID No. is 1275
- Chairperson signature ID No. is 1234
- Treasurer signature ID No. is 5678

NS1-1 (10/1/2013 - 10/11/2013) 10/18/2013	Not Filed	Not Filed	No Data Entered Optional Don't Require This Rpt	Attach PDF
NS2-1 (10/12/2013 - 10/31/2013) 11/1/2013	Not Filed	Not Filed	No Data Entered Optional Don't Require This Rpt	Attach PDF
M10-1 (10/1/2013 - 10/31/2013) 11/12/2013	Not Filed	Not Filed	No Data Entered	Attach PDF
M11-1 (11/1/2013 - 11/30/2013) 12/10/2013	Not Filed	Not Filed	No Data Entered	Attach PDF
M12-1 (12/1/2013 - 12/31/2013) 1/10/2014	Not Filed	Not Filed	No Data Entered	Attach PDF

If you have any questions, please let me know.

Maria Acosta
Miami-Dade Elections Department
Election Coordination, Campaigns and Compliance
305-499-8410
www.miamidade.gov
"Delivering Excellence Every Day"

From: Lorie Frederick [mailto:lfrederick@cricpa.com]
Sent: Tuesday, November 12, 2013 12:23 PM
To: Acosta, Maria (Elections)
Cc: Innocent, Vanessa (Elections); ron@seiu1991.org
Subject: RE: Miami Dade Supervisor of Election

An email address would be ron@seiu1991.org and the phone number is 305-620-6555. Thanks for your

help! I appreciate it!

From: Acosta, Maria (Elections) [mailto:SOEMACO@miamidade.gov]
Sent: Tuesday, November 12, 2013 12:17 PM
To: Lorie Frederick
Cc: Innocent, Vanessa (Elections)
Subject: RE: Miami Dade Supervisor of Election

If you have an email and a phone number it will be helpful in case we need to communicate any information.

The ID Number for this Independent Expenditure Organization is 1275 you can log in thru our website under Political Committees and click on the 3rd link "Committee Online Reporting".

Political Committees

Political Committee Handbook
Information useful to form a committee and other useful information.

Committee Campaign Reports and Filing Documents
See the list of previous and current committees and address their campaign needs and qualifying requirements.

Committee Online Reporting
Online tool for filing a Code of Ethics Conflict of Interest Reporting Statement and a disclosure.

Now Reporting Requirements for 11/05/13 Miami Dade County Special Election

On Tuesday, June 2, 2013 the Board of County Commissioners called for a November 5, 2013 Special Election for the approval of General Obligation Bonds and the modernization, improvement and upgrading of Jackson Health System facilities throughout the county. Any qualified Committee members in activities supporting or opposing the issue must contact the Elections Department Candidates Service Unit at (305)499-8410 or 305-499-8410 or submit an affidavit to the special reports required, as listed below.

Report Type	Due Date	From	To
03-12	10/10/13	305-499-8410	305-499-8410
05-13	10/16/13	305-499-8410	305-499-8410
07-13	11/05/13	305-499-8410	305-499-8410

Voter tool kit

Registered voter
Check Your Registration Status
View Your Sample Ballot
Find an Absentee Ballot Field
Track Your Absentee Ballot
View and Print Photo

Maria Acosta
Miami-Dade Elections Department
Election Coordination, Campaigns and Compliance
305-499-8410
www.miamidade.gov
"Delivering Excellence Every Day"

From: Lorie Frederick [mailto:lfrederick@cricpa.com]
Sent: Tuesday, November 12, 2013 10:55 AM
To: Acosta, Maria (Elections)
Subject: FW: Miami Dade Supervisor of Election

Maria,

I believe this is the information that you needed. Please let me know if you need any additional information. Thank you so much for your help!

Service Employees International Union Local 1991
(if they need the name of a person, please use **Martha Baker**)
18441 NW 2 Avenue, Suite 502
Miami Gardens, FL 33169

Lorie



Lorie Frederick, CPA
Manager
Carr, Riggs & Ingram, LLC
1713 Mahan Drive
Tallahassee, FL 32308
Voice: 850-878-8777
Fax: 850-878-2344
<http://www.cricpa.com>
<http://blog.cricpa.com>

In compliance with IRS Circular 230:

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