

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

**In Re: Cable Television Political Action
Committee for Florida**

Case No.: FEC 17-390

TO: Ronald G. Meyer, Esquire
Meyer, Brooks, Demma and Blohm PA
131 North Gadsden Street
Tallahassee, FL 32301

Division of Elections
500 S Bronough Street, Room 316
Tallahassee, FL 32399

NOTICE OF HEARING (AUTOMATIC FINE)

A hearing will be held in this case before the Florida Elections Commission on, **March 13, 2018 at 8:30 am, or as soon thereafter as the parties can be heard**, at the following location: **Augustus B. Turnbull Conference Center, 555 West Pensacola Street, Room 103, Tallahassee, Florida 32301.**

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 Ann 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
February 26, 2018

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-17-390

NAME: **CABLE TELEVISION POLITICAL ACTION COMMITTEE FOR FLORIDA**

DATE APPEAL RECEIVED: 11/07/17

DATE REPORT DUE: 07/10/17 (2017 M6)

DATE OF ELECTRONIC RECEIPT: 07/10/17¹

DATE FILING OFFICER RECEIVED REPORT: 07/10/17

NUMBER OF DAYS LATE: 0

AMOUNT OF FINE: \$8,211.00

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

TOTAL RECEIPTS FOR REPORTING PERIOD: \$32,844.02

TOTAL EXPENDITURES FOR REPORTING PERIOD: \$0.00

DATE FIRST NOTIFICATION WAS SENT: 10/05/17

| | |
|---------------------|--------------|
| CANDIDATE [] | STATE [X] |
| PC [X] | DISTRICT [] |
| CCE [] | COUNTY [] |
| POLITICAL PARTY [] | CITY [] |
| ECO [] | |

SUMMARY: Cable Television Political Action Committee for Florida is a political committee (PC) registered with the State of Florida. The PC's chair is Marva Johnson and its treasurer is William B. Swanson. The PC is represented by Ron Meyer.

Mr. Meyer explained that, upon the departure of a longtime employee who had performed reporting duties, those duties were transferred to an employee who had no experience in preparing reports. The departing employee did not leave instructions or policies regarding compliance work. Furthermore, Respondent's bank account had been transferred to a different bank in early 2017. In the process, the bank comingled Respondent's funds with those of an affiliated association that transferred to the same bank. During the process of sorting out this error, funds Respondent had already reported as contributions were transferred into Respondent's new account throughout the year. A timely waiver of the M6 report was filed. An unrelated audit letter from the Division of Elections prompted a review of finances, which led Respondent to file the M6 report to reflect contributions that had been incorrectly regarded as transfers of monies that Respondent had previously reported associated with the bank error. There was no wrongful purpose associated with this transaction. A fine of \$8,211 is unwarranted. The extenuating circumstances warrant waiver or substantial reduction of the fine.

- The 2017 M6 Report covers the reporting period of 06/01 – 06/30/17.
- The 2017 M6 Queued-Transactions Report reflects that this report was created on 07/10/17 at 3:34 p.m., before being filed on 07/10/17 at 3:35 p.m.
- In an e-mail from Kristi R. Willis dated 11/27/17, FEC staff was informed that Respondent filed a waiver of the report on 7/10/17, and on 9/13/17 filed a report showing \$32,844.02 of activity.

PRIOR CASES: In FEC 13-286, the PC was assessed a fine in the amount of \$125 relative to an automatic-fine involving the 2013 Q3 report.

¹ Respondent initially filed a waiver that reflected no activity, but later filed a 2017 M6 Report to reflect activity.

Cole Kekelis

From: Willis, Kristi R. <Kristi.Willis@DOS.MyFlorida.com>
Sent: Wednesday, February 07, 2018 2:05 PM
To: Cole Kekelis
Subject: RE: Cable Television PAC for Florida PAC - account 60679

Yes, that sums it up. ☺

From: Cole Kekelis [mailto:Cole.Kekelis@myfloridalegal.com]
Sent: Wednesday, February 07, 2018 2:02 PM
To: Willis, Kristi R. <Kristi.Willis@DOS.MyFlorida.com>
Subject: RE: Cable Television PAC for Florida PAC - account 60679

Thank you very much for you quick and thorough response!

Please confirm if my understanding of these two reports is now correct: Initially, timely waivers for both reports were filed, after which both reports were filed to declare significant contributions, upon which the automatic fines were based. However, subsequent to the imposition of the fines, all of the reported contributions were deleted, so that both reports now declare no financial activity at all.

From: Willis, Kristi R. [mailto:Kristi.Willis@DOS.MyFlorida.com]
Sent: Wednesday, February 07, 2018 10:57 AM
To: Cole Kekelis <Cole.Kekelis@myfloridalegal.com>
Subject: RE: Cable Television PAC for Florida PAC - account 60679

See my remarks below.

From: Cole Kekelis [mailto:Cole.Kekelis@myfloridalegal.com]
Sent: Wednesday, February 07, 2018 9:14 AM
To: Willis, Kristi R. <Kristi.Willis@DOS.MyFlorida.com>
Subject: RE: Cable Television PAC for Florida PAC - account 60679

Ms. Willis:

Could you please confirm whether my assessment of these two reports is correct?

Initially, timely waivers were filed for both reports. yes

Both were subsequently amended to report a significant amount of contributions, so automatic fines were imposed. yes

Both reports have been amended after the fines were imposed to delete various contributions. yes

It appears that the only contributions that are now reported on those reports are the following:

1. 2017 M1 – 1-6-17 – Comcast - \$42,694.85 – No.

On 9-13, sequences 1 and 2 were added for a total of \$43,529.71. On 12-7, the amount of the contribution in sequence 1 was changed to 0 and sequence 2 was deleted. In a second amendment on 12-7, sequence 1 was deleted.

2. 2017 M6 – 6-1-17 – Charter Communications - \$27,839.40 – No.

On 9-13, sequences 1, 2 and 3 were added. On 10-12, sequence 1 was changed from \$27K to \$26K and sequences 2 and 3 were deleted. Sequence 1 was deleted on 10-13 making it a zero report.

The fine imposed for the 2017 M1 report was \$10,882.43, based on the initially reported \$43,529.71 in contributions (notice of fine dated 10-27-17), yes

of which \$834.86 was subsequently deleted in amended report filed on 12-7-17. See above.

The fine imposed for the 2017 M6 report was \$8,211.00 (notice of fine dated 10-5-17), which is 25% of \$32,844.02. YES

However, according to the report, \$55,734.45 in contributions were disclosed on the initial report filed 9-13-17. The fine does not appear to have taken into account the \$26,735.43 contribution reported as having been received on 6-1-17 from Charter Communications. Regardless, that contribution, as well as all the other contributions except a single \$27,839.40 contribution from Charter Communications on 6-1-17, were subsequently deleted in report amendments going up to 10-13-17, which was after the fine had already been imposed. No. See above.

Further, according to the Division’s website, both reporting periods are currently showing no contributions or financial activity of any kind. Correct

Yet, the QTR and reports you provided do not reflect an amendment to remove the last remaining contribution on each report. The QTRs do show this.

Please see below, which was taken from the Division’s committee search database of financial activity for the committees in question:

| | | | | | | |
|-------------------------|------|------|------|------|------|------|
| 01/01/2017 - 01/31/2017 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| 06/01/2017 - 06/30/2017 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

Again, please confirm that my assessment of these reports is correct. If it isn’t, please correct it.

Also, please explain why the reports and QTR’s do not appear to match what is displayed on the Division’s website as it relates to the financial activity for these two reporting periods.

I realize this is confusing, YES it is!!!!!!!

and I appreciate your help in sorting these two reports out.

Sincerely,

Cole Kekelis
FEC

From: Willis, Kristi R. [mailto:Kristi.Willis@DOS.MyFlorida.com]

Sent: Wednesday, February 07, 2018 8:29 AM

To: Cole Kekelis <Cole.Kekelis@myfloridalegal.com>

Subject: RE: Cable Television PAC for Florida PAC - account 60679

From: Cole Kekelis [<mailto:Cole.Kekelis@myfloridalegal.com>]

Sent: Tuesday, February 06, 2018 3:07 PM

To: Willis, Kristi R. <Kristi.Willis@DOS.MyFlorida.com>

Subject: Cable Television PAC for Florida PAC - account 60679

Ms. Willis:

Could you please provide me with the following two reports and associated QTRs for the above committee?

2017 M1

2017 M6

Thanks,

Cole Kekelis

FEC

The Department of State is committed to excellence.
Please take our [Customer Satisfaction Survey](#).



RE: Appeal - ID #60679

Willis, Kristi R.

to:

Keith Smith

11/27/2017 10:44 AM

Hide Details

From: "Willis, Kristi R." <Kristi.Willis@DOS.MyFlorida.com>

To: Keith Smith <Keith.Smith@myfloridalegal.com>

2017 M1: The committee filed a notice of no activity (waiver) on 2-8-17. A waiver is not a report. On 9-13-17, the committee filed a report showing \$\$43,529.71 of activity. The fine is based on 25% of the activity reported.

2017 M6: The committee filed a notice of no activity (waiver) on 7-10-17 . A waiver is not a report. On 9-13-17 , the committee filed a report showing \$32,844.02 of activity. The fine is based on 25% of the activity reported.

From: Keith Smith [<mailto:Keith.Smith@myfloridalegal.com>]

Sent: Friday, November 17, 2017 12:07 PM

To: Willis, Kristi R. <Kristi.Willis@DOS.MyFlorida.com>

Subject: Appeal - ID #60679

RE: Cable Television Political Action Committee for Florida (#60679)

Kristi:

Could you please explain the discrepancy for this PC's 2017 M1 and 2017 M6 reports for me. DOE records reflect the M1 report was filed on 02/08/17, two days before the report was due and the M6 report was filed on the due date, 07/10/17. The PC was fined \$10,882.43 for the M1 report and \$8,221.00 for the M6 report.

Thank you for your help in this matter.

Keith Smith

Investigator - Florida Elections Commission
107 West Gaines Street - Suite 224
Tallahassee, FL 32399-1050
(850) 922-4539 (phone)
(850) 921-0783 (fax)

The Department of State is committed to excellence.
Please take our [Customer Satisfaction Survey](#).

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

ALEX VILLALOBOS
OF COUNSEL

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

REC'D: FL ELECTIONS COM
5 FEB '18 PM 2:16

February 5, 2018

By Hand Delivery

Commissioner Scott Thomas, Chairman
Florida Elections Commission
107 West Gaines Street, Suite 224
Collins Building
Tallahassee, Florida 32399-1050

Re: Case Nos.: FEC 17-389 and 17-390, Respondent Cable Television Political
Action Committee for Florida Political Committee (PAC 60679)

Dear Commissioner Thomas:

In this proceeding, automatic fines in two cases in the combined amount of \$19,093.43 have been imposed by letters dated October 27, 2017. We respectfully request that due to the unusual circumstances giving rise to the fines, the fines be excused or reduced. Each of these fines results from a new staff person mistakenly filing timely waivers and then, upon discovering that a waiver wasn't appropriate, correcting the error with amended reports.

As a backdrop for the circumstances giving rise to the reporting mistakes which were made and subsequently corrected, we feel constrained to note that the longtime staff person who had previously performed election compliance activities for the committee left employment with the association which is affiliated with the committee in late 2016. The reporting duties were transferred to another association employee who had no prior experience in preparing the reports or with working on the Division's Electronic Filing System. Neither did the previous employee leave instructions nor policies regarding compliance work. The 2017 M1 report was the first report which the new employee prepared on her own. Like so many people do, the new staff person mistakenly believed that filing a waiver was, in fact, filing a report.

Complicating matters further, the committee's bank account was, in early 2017, transferred from Capital City Bank to Prime Meridian Bank. At the time of such transfer, and for reasons not entirely clear, Capital City Bank transferred the committee's balance of funds

comingled with the affiliated association's balance of funds (the association also moved its funds from Capital City to Prime Meridian) in a single check. In sorting the balances, funds which the committee had already reported as contributions during prior years, were subsequently transferred from the association to the committee's new bank account at various times during the year.

With these moving parts, here is what occurred:

Case No. FEC 17-389 – Amendment to 2017 M1 Report

A autofine of \$10,822.43 has been assessed against the committee for allegedly filing its 2017 M1 report on September 13, 2017. However, that is not exactly what occurred.

A timely waiver of the 2017 M1 report was filed on February 8, 2017. It contained a reporting mistake, however. Due to the confusion stemming from the transfer from one bank to another of the committee's funds, the new staff person preparing the reports mistakenly believed that no new contribution had been received. She believed the money deposited was from previously reported contributions which were transferred due to the bank change. It wasn't until September, 2017 when the committee was notified of some audit discrepancies, that the mistake was noticed (not cited in the audit, but the review precipitated by the audit disclosed the error).

To ensure correct reporting, on September 13, 2017, an amendment to the 2017 M1 report was made to properly identify what had been believed to have been the transfer of previously reported funds to instead reflect a contribution. Subsequently, on December 7, 2017, the report was amended again to reflect that one of the contributions had been erroneously reported in the first amended report and was therefore deleted. The autofine which was calculated as a result of the report being corrected on September 13, 2017, included the contribution which was subsequently deleted on December 7, 2017, however. The minor mistake made by an employee newly charged with reporting responsibilities, which mistake was subsequently discovered and corrected, has resulted in a massive fine being imposed.

We submit that the mistake of filing the waiver upon the erroneous belief that the funds were from the bank's transfer of monies rather than from a contribution, a mistake made by a person new to filing reports, was an understandable mistake and constitutes unusual circumstances warranting a reduction or abatement of the fine imposed. Only a single contribution was omitted when the waiver was filed. Upon discovery of the mistake, the record was corrected to reflect what occurred. There is nothing to indicate that the reporting error was done in a way to conceal any contribution. It was a simple mistake.

We have attached the Division of Elections computer record disclosing the transactions.

Commissioner Scott Thomas, Chairman
February 5, 2018
Page Three

We respectfully request the Commission to set aside the autofine stemming from the amendment which was made to correct the 2017 M1 report in Case No. FEC 17-389.

Case No. FEC 17-390 – Amendment to 2017 M6 Report

A timely waiver of the 2017 M6 report was filed by the committee on July 10, 2017. However, while reviewing the financial circumstances in response to the Division of Elections audit letter previously mentioned which suggested that a deficit balance appeared to exist in the committee's reports (there was no bank account deficit) on September 13, 2017, the staff person amended the report to reflect contributions which had previously been overlooked. Once again, the staff person initially erroneously believed that the contributions were in fact monies which had previously been reported and were transferred from the prior depository to the current depository. Upon discovering the mistake, she immediately took steps to correct the report.

Once again, staff mistakenly believed that the 2017 M6 waiver was correct when it was filed. It was not until further review that the mistake was discovered and corrected with an amended report. We have attached the Division of Elections computer record disclosing the transactions referenced.

We submit that there was no wrongful purpose associated with this transaction and that a fine of \$8,211.00 is unwarranted.

Accordingly, we request the Commission to set aside the autofine stemming from the transactions, as described above, related to the 2017 M6 report in Case No. FEC 17-390

In sum, we respectfully request that the Commission take the overall circumstances into account and set aside both of the automatic fines which have been assessed. Alternatively, the fines should be substantially reduced to a reasonable amount given the extenuating circumstances and the fact that the mistakes consisted of the omission of only a few entries which were immediately corrected upon discovery.

Sincerely,



Ronald G. Meyer

RGM/ltt

Enclosures

cc: Cole Kekelis, Esquire

Filed Campaign Treasurer's Report

Cable Television Political Action Committee for Florida
60679 - PAC

Elect ID: 20181106-GEN
Report: 2017 M1 (83)

From: 1/1/2017
To: 1/31/2017

Amd: Y Wvr: O
Cmplt: COM

Filed: FIL 2/8/2017 1:28:57 PM
Reviewed: AUD 12/7/2017 9:52:26 A

Original Report

Submitted: 2/8/2017 1:28:57 PM

Amended Report

Submitted: 9/13/2017 11:26:19 A

CONTRIBUTIONS

| <i>Seq Date</i> | <i>Name</i> | <i>Address</i> | <i>Contributor Type</i> | <i>Occupation Inkind Description</i> | <i>Errors Amd</i> | <i>Amount</i> |
|---------------------|---------------------------|---|-----------------------------|--|-----------------------|---------------|
| 1 1/6/2017 | COMCAST | 1100 NORTHPOINT PARKWAY WEST PALM BEA FL 33407 | B CHE | CABLE COMPANY | 1 ADD | \$0.00 |
| 1 1/6/2017 | COMCAST | 1100 NORTHPOINT PARKWAY WEST PALM BEA FL 33407 | B CHE | CABLE COMPANY | 0 ADD | \$42,694.85 |
| 2 1/6/2017 | MEDIACOM COMMUNICATIONS C | 1613 NANTAHALA BEACH RD GILF BREEZE FL 32563 | B CHE | CABLE COMPANY | 0 ADD | \$834.86 |

Amended Report

Submitted: 10/12/2017 2:13:18 P

Filed Campaign Treasurer's Report

Cable Television Political Action Committee for Florida
60679 - PAC

Elect ID: 20181106-GEN
Report: 2017 M1 (83)

From: 1/1/2017
To: 1/31/2017

Amd: Y Wvr: O
Cmplt: COM

Filed: FIL 2/8/2017 1:28:57 PM
Reviewed: AUD 12/7/2017 9:52:26 A

Amended Report

Submitted: 10/12/2017 2:13:18 P

Amended Report

Submitted: 12/7/2017 9:45:58 A

Amended Report

Submitted: 12/7/2017 9:50:10 A

CONTRIBUTIONS

| <i>Seq Date</i> | <i>Name</i> | <i>Address</i> | <i>Contributor Type</i> | <i>Occupation Inkind Description</i> | <i>Errors Amd</i> | <i>Amount</i> |
|---------------------|---------------------------|-------------------------|-----------------------------|--|-----------------------|---------------|
| 1 | COMCAST | 1100 NORTHPOINT PARKWAY | B | CABLE COMPANY | 1 | \$0.00 |
| 1/6/2017 | | WEST PALM BEA FL 33407 | CHE | | UPD | |
| 2 | MEDIACOM COMMUNICATIONS C | 1613 NANTAHALA BEACH RD | B | CABLE COMPANY | 0 | \$834.86 |
| 1/6/2017 | | GILF BREEZE FL 32563 | CHE | | DEL | |

Filed Campaign Treasurer's Report

Cable Television Political Action Committee for Florida Elect ID: 20181106-GEN From: 1/1/2017 Amd: Y Wvr: O Filed: FIL 2/8/2017 1:28:57 PM
 60679 - PAC Report: 2017 M1 (83) To: 1/31/2017 Cmpl: COM Reviewed: AUD 12/7/2017 9:52:26 A

Amended Report

Submitted: 12/7/2017 9:52:39 A

CONTRIBUTIONS

| Seq Date | Name | Address | Contributor Type | Occupation Inkind Description | Errors Amd | Amount |
|---------------|---------|---|---------------------|----------------------------------|---------------|--------|
| 1 1/6/2017 | COMCAST | 1100 NORTHPOINT PARKWAY WEST PALM BEA FL 33407 | B CHE | CABLE COMPANY | I DEL | \$0.00 |

Filed Campaign Treasurer's Report

Cable Television Political Action Committee for Florida Elect ID: 20181106-GEN From: 6/1/2017 Amd: Y Wvr: O Filed: FIL 7/10/2017 3:35:19 P
 60679 - PAC Report: 2017 M6 (89) To: 6/30/2017 Cmpl: COM Reviewed: AUD 10/13/2017 10:35:47

Original Report

Submitted: 7/10/2017 3:35:19 P

Amended Report

Submitted: 9/13/2017 11:43:28 A

CONTRIBUTIONS

| Seq Date | Name | Address | Contributor Type | Occupation Inkind Description | Errors Amd | Amount |
|---------------|------------------------|--|---------------------|----------------------------------|---------------|-------------|
| 1 6/1/2017 | CHARTER COMMUNICATIONS | 700 CARILLON PARKWAY DT PETERSBURG FL 33716 | B CHE | CABLE COMPANY | 0 ADD | \$26,735.43 |
| 1 6/1/2017 | CHARTER COMMUNICATIONS | 700 CARILLON PARKWAY DT PETERSBURG FL 33716 | B CHE | CABLE COMPANY | 0 ADD | \$27,839.40 |
| 2 6/1/2017 | COX COMMUNICATIONS | 1400 LAKE HEARN DRIVE ATLANTA GA 30319 | B CHE | CABLE COMPANY | 0 ADD | \$4,272.72 |
| 3 6/1/2017 | ATLANTIC BROADBAND | 4121 ORCHARD ST SOUTH PARK PA 15129 | B CHE | CABLE COMPANY | 0 ADD | \$731.90 |
| 4 | | | X X | | 8 ADD | 50.00 |

Filed Campaign Treasurer's Report

Cable Television Political Action Committee for Florida
60679 - PAC

Elect ID: 20181106-GEN
Report: 2017 M6 (89)

From: 6/1/2017
To: 6/30/2017

Amd: Y Wvr: O
Cmplt: COM

Filed: FIL 7/10/2017 3:35:19 P
Reviewed: AUD 10/13/2017 10:35:47

Amended Report

Submitted: 9/13/2017 11:45:48 A

Amended Report

Submitted: 10/11/2017 3:21:01 P

CONTRIBUTIONS

| <i>Seq Date</i> | <i>Name</i> | <i>Address</i> | <i>Contributor Type</i> | <i>Occupation Inkind Description</i> | <i>Errors Amd</i> | <i>Amount</i> |
|---------------------|-------------|----------------|-----------------------------|--|-----------------------|---------------|
| 4 | | | X | | 8 | \$0.00 |
| | | | X | | DEL | |

Filed Campaign Treasurer's Report

Cable Television Political Action Committee for Florida Elect ID: **20181106-GEN** From: **6/1/2017** Amd: **Y** Wvr: **O** Filed: **FIL** 7/10/2017 3:35:19 P
 60679 - PAC Report: **2017 M6 (89)** To: **6/30/2017** Cmpl: **COM** Reviewed: **AUD** 10/13/2017 10:35:47

Amended Report

Submitted: 10/12/2017 2:35:20 P

CONTRIBUTIONS

| Seq Date | Name | Address | Contributor Type | Occupation Inkind Description | Errors Amd | Amount |
|----------|------------------------|------------------------|------------------|-------------------------------|------------|-------------|
| 1 | CHARTER COMMUNICATIONS | 700 CARILLON PARKWAY | B | CABLE COMPANY | 0 | \$26,735.43 |
| 6/1/2017 | | DT PETERSBURG FL 33716 | CHE | | UPD | |
| 2 | COX COMMUNICATIONS | 1400 LAKE HEARN DRIVE | B | CABLE COMPANY | 0 | \$4,272.72 |
| 6/1/2017 | | ATLANTA GA 30319 | CHE | | DEL | |
| 3 | ATLANTIC BROADBAND | 4121 ORCHARD ST | B | CABLE COMPANY | 0 | \$731.90 |
| 6/1/2017 | | SOUTH PARK PA 15129 | CHE | | DEL | |

Amended Report

Submitted: 10/13/2017 10:36:01

CONTRIBUTIONS

| Seq Date | Name | Address | Contributor Type | Occupation Inkind Description | Errors Amd | Amount |
|----------|------------------------|------------------------|------------------|-------------------------------|------------|-------------|
| 1 | CHARTER COMMUNICATIONS | 700 CARILLON PARKWAY | B | CABLE COMPANY | 0 | \$26,735.43 |
| 6/1/2017 | | DT PETERSBURG FL 33716 | CHE | | DEL | |

REC'D: FL ELECTIONS COM
5 FEB 19 PM 2:16

HAND DELIVERY

MEYER, BROOKS, DEMMA, ASPROS AND BLOHM, P.A.

ATTORNEYS AT LAW

POST OFFICE BOX 1547

TALLAHASSEE, FLORIDA 32302

TO:

Cole Kekelis, Esquire
Florida Elections Commission
107 West Gaines Street, Suite 224
Collins Building
Tallahassee, Florida 32399-1050

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

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

RECEIVED

2017 NOV -7 A 11:44

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

ALEX VILLALOBOS
OF COUNSEL

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

November 3, 2017

Via U.S. Mail and e-mail: amy.toman@myfloridalegal.com

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

Re: Notice of Appeal – Cable Television Political Action Committee for Florida
(PAC 60679)

Dear Ms. Toman:

This correspondence is to notify you that our office represents the Cable Television Political Action Committee for Florida (PAC 60679), which by two separate letters dated October 27, 2017 (enclosed), received by the committee on November 1, 2017, has been assessed automatic fines for asserted late-filing of treasurer's reports due on February 10, 2017 and July 10, 2017.

By this correspondence, the committee appeals the fines which have been imposed and requests an opportunity to present argument at a hearing before the Commission as authorized by Rules 2B-1.005 and 2B-1.055, Florida Administrative Code.

If any further steps are required to perfect this appeal, please notify me at once. We assume that since both automatic fine letters relate to the same political committee and the transactions are related that the matters can be considered together. If not, please notify me at once so that we may separately appeal each of the automatic fines.

Ms. Amy McKeever Toman
November 3, 2017
Page Two

We request that further communication relating to this matter be directed through this office.

Thank you, in advance, for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read 'RGM', is written over the typed name.

Ronald G. Meyer

Enclosures

cc: Mr. William B. Swanson, Treasurer
Ms. Donna Malphurs, Clerk
Florida Division of Elections



FLORIDA DEPARTMENT OF STATE

Ken Detzner
Secretary of State

DIVISION OF ELECTIONS

USPS Tracking #
9114 9014 9645 1081 2821 19

Final Notice
Delivery Confirmation:

October 27, 2017

William B. Swanson, Treasurer
Cable Television Political Action Committee for Florida
246 East 6th Avenue
Suite 100
Tallahassee, FL 32303-2303

PAC 60679

Dear Mr. Swanson:

The campaign treasurer's report that was due on July 10, 2017, was filed on September 13, 2017. By law, you are automatically assessed a late fine of \$8,211.00.

You have 20 days from the receipt of this notice to either:

1. Pay the fine to the Florida Division of Elections (For a candidate only, a fine is not an allowable campaign expenditure and must be paid from personal funds) at:

*Florida Division of Elections
R.A. Gray Building, Room. 316
500 South Bronough Street
Tallahassee, Florida 32399-025011*

2. Appeal the fine to the Florida Elections Commission (See Rules 2B-1.005 and 2B-1.0055, Florida Administrative Code) at:

*Florida Elections Commission
107 West Gaines Street, Ste. 224
Tallahassee, Florida 32399-0150*

If you appeal, please send a copy also to the Florida Division of Elections so that you will not receive further notices from the Division about this matter.

If you have any questions, please contact the help desk at (850) 245-6280.

Sincerely,

Kristi Reid Willis, Chief
Bureau of Election Records

cc: Marva Johnson, Chairperson



FLORIDA DEPARTMENT OF STATE

Ken Detzner
Secretary of State

DIVISION OF ELECTIONS

October 5, 2017

William B. Swanson, Treasurer
Cable Television Political Action Committee for Florida
246 East 6th Avenue
Suite 100
Tallahassee, FL 32303-2303

PAC 60679

Dear Mr. Swanson:

The campaign treasurer's report that was due on July 10, 2017, was filed on September 13, 2017. By law, you are automatically assessed a late fine of \$8,211.00.

You have 20 days from the receipt of this notice to either:

1. Pay the fine to the Florida Division of Elections (For a candidate only, a fine is not an allowable campaign expenditure and must be paid from personal funds) at:

*Florida Division of Elections
R.A. Gray Building, Room. 316
500 South Bronough Street
Tallahassee, Florida 32399-025011*

2. Appeal the fine to the Florida Elections Commission (See Rules 2B-1.005 and 2B-1.0055, Florida Administrative Code) at:

*Florida Elections Commission
107 West Gaines Street, Ste. 224
Tallahassee, Florida 32399-0150*

If you appeal, please send a copy also to the Florida Division of Elections so that you will not receive further notices from the Division about this matter.

If you have any questions, please contact the help desk at (850) 245-6280.

Sincerely,

Kristi Reid Willis, Chief
Bureau of Election Records

cc: Marva Johnson, Chairperson

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

(1) Cable Television Political Action Committee for Florida (2) 60679
Candidate, Committee or Party Name I.D. Number

(3) 246 East 6th Avenue Tallahassee FL 32303-0000
Address (number and street) City State Zip Code
 Check box if address has changed since last report

(4) Check appropriate box(es):
 Candidate (office sought):
 Political Committee Check If PC has DISBANDED
 Committee of Continuous Existance Check If CCE has DISBANDED
 Party Executive Committee

(5) REPORT IDENTIFIERS

Cover Period: From 06/01/2017 To 06/30/2017 Report Type: M6
 Original Amendment Special Election 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 \$0.00
 Transfers to Office Account \$0.00
 Total Monetary \$0.00

(8) Other Distributions

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

Name of Treasurer Deputy Treasurer

X
Signature

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

Name of Candidate Chairman (PC/PTY Only)

X
Signature

Name: Cable Television Political Action Committee for Florida

Report: 2017 M6

Period: 06/01/2017 to 06/30/2017

** Records in Filed Report **

| Seq # | Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip | Contributor | Occupation | Amount |
|------------|---|-------------|---------------------|----------------------|
| | | Type | In-Kind Description | Amend |
| 1 | CHARTER COMMUNICATIONS 700 CARILLON PARKWAY DT PETERSBURG, FL 33716 | B | CABLE COMPANY | \$26,735.43 |
| 06/01/2017 | | CHE | | DEL |
| 1 | CHARTER COMMUNICATIONS 700 CARILLON PARKWAY DT PETERSBURG, FL 33716 | B | CABLE COMPANY | \$27,839.40 |
| 06/01/2017 | | CHE | | ADD History 10/12/17 |
| 2 | COX COMMUNICATIONS 1400 LAKE HEARN DRIVE ATLANTA, GA 30319 | B | CABLE COMPANY | \$4,272.72 |
| 06/01/2017 | | CHE | | DEL |
| 3 | ATLANTIC BROADBAND 4121 ORCHARD ST SOUTH PARK, PA 15129 | B | CABLE COMPANY | \$731.90 |
| 06/01/2017 | | CHE | | DEL |
| * 4 | | X | | \$0.00 |
| | | X | | DEL |

ID:

CAMPAIGN TREASURER'S REPORT - ITEMIZED EXPENDITURES

Page 1 of 1

Name: Cable Television Political Action Committee for Florida

Report: 2017 M6

Period: 06/01/2017

to 06/30/2017

**** Records in Filed Report ****

| Seq # Date | Full Name (Last, Suffix, First, Middle Street Address & City, State, Zip | Type | Purpose | Amount Amend |
|---------------|--|------|---------|-----------------|
| | | | | |

ID:

CAMPAIGN TREASURER'S REPORT – ITEMIZED FUND TRANSFERS

Page 1 of 1

Name: Cable Television Political Action Committee for Florida

Report: 2017 M6

Period: 06/01/2017

to 06/30/2017

**** Records in Filed Report ****

| Seq # Date | Full Name (Last, Suffix, First, Middle Street Address & City, State, Zip | Type | Nature of Account | Amount Amend |
|---------------|--|------|-------------------|-----------------|
| | | | | |

ID:

CAMPAIGN TREASURER'S REPORT - ITEMIZED DISTRIBUTIONS

Name: Cable Television Political Action Committee for Florida

Report: 2017 M6

Period: 06/01/2017 to 06/30/2017

**** Records in Filed Report ****

| Seq # Date | Full Name (Last, Suffix, First, Middle Street Address & City, State, Zip | Recipient | Purpose | Amount |
|---------------|--|-----------|---------------------|--------|
| | | Type | Related Expenditure | Amend |
| | | | | |
| | | | | |

Queued Items for 2017-M6

Account: 60679

Cable Television Political Action Committee for Florida

Rpt Seq: 89

| <i>ProcessDescription</i> | <i>Status</i> | <i>Submitter</i> | <i>Created</i> | <i>LastUpdate</i> |
|-----------------------------|---------------------|------------------|------------------------|------------------------|
| Create Pending Report | Processing Complete | 60679 | 7/10/2017 3:34:55 PM | 7/10/2017 3:34:55 PM |
| Review Pending Report | Processing Complete | 60679 | 7/10/2017 3:34:58 PM | 7/10/2017 3:34:58 PM |
| File Pending Report | Processing Complete | 60679 | 7/10/2017 3:35:19 PM | 7/10/2017 3:35:19 PM |
| Amend Filed Report | Processing Complete | 60679 | 9/13/2017 11:29:10 AM | 9/13/2017 11:29:10 AM |
| Review Pending Report | Processing Complete | 60679 | 9/13/2017 11:35:58 AM | 9/13/2017 11:35:58 AM |
| Review Pending Report | Processing Complete | 60679 | 9/13/2017 11:42:35 AM | 9/13/2017 11:42:35 AM |
| File Pending Report | Processing Complete | 60679 | 9/13/2017 11:43:28 AM | 9/13/2017 11:43:28 AM |
| Review Filed Report | Processing Complete | 60679 | 9/13/2017 11:45:02 AM | 9/13/2017 11:45:02 AM |
| Amend Filed Report | Processing Complete | 60679 | 9/13/2017 11:45:15 AM | 9/13/2017 11:45:15 AM |
| File Pending Report | Processing Complete | 60679 | 9/13/2017 11:45:48 AM | 9/13/2017 11:45:48 AM |
| Amend Filed Report | Processing Complete | 60679 | 10/11/2017 3:19:56 PM | 10/11/2017 3:19:56 PM |
| Review Pending Report | Processing Complete | 60679 | 10/11/2017 3:20:37 PM | 10/11/2017 3:20:37 PM |
| File Pending Report | Processing Complete | 60679 | 10/11/2017 3:21:01 PM | 10/11/2017 3:21:01 PM |
| Amend Filed Report | Processing Complete | 60679 | 10/12/2017 2:22:52 PM | 10/12/2017 2:22:52 PM |
| Review Pending Report | Processing Complete | 60679 | 10/12/2017 2:30:44 PM | 10/12/2017 2:30:44 PM |
| Recalc Pending Report Total | Processing Complete | 60679 | 10/12/2017 2:30:48 PM | 10/12/2017 2:30:48 PM |
| Review Pending Report | Processing Complete | 60679 | 10/12/2017 2:32:20 PM | 10/12/2017 2:32:20 PM |
| Recalc Pending Report Total | Processing Complete | 60679 | 10/12/2017 2:32:24 PM | 10/12/2017 2:32:24 PM |
| Recalc Pending Report Total | Processing Complete | 60679 | 10/12/2017 2:34:54 PM | 10/12/2017 2:34:54 PM |
| Review Pending Report | Processing Complete | 60679 | 10/12/2017 2:34:58 PM | 10/12/2017 2:34:58 PM |
| File Pending Report | Processing Complete | 60679 | 10/12/2017 2:35:20 PM | 10/12/2017 2:35:20 PM |
| Amend Filed Report | Processing Complete | 60679 | 10/13/2017 10:34:15 AM | 10/13/2017 10:34:15 AM |
| Recalc Pending Report Total | Processing Complete | 60679 | 10/13/2017 10:35:43 AM | 10/13/2017 10:35:43 AM |
| Review Pending Report | Processing Complete | 60679 | 10/13/2017 10:35:47 AM | 10/13/2017 10:35:47 AM |
| File Pending Report | Processing Complete | 60679 | 10/13/2017 10:36:01 AM | 10/13/2017 10:36:01 AM |



[search](#) | [directory](#) | [contact us](#) | [411](#) | [subscribe](#) | [tour](#) | [help](#)

Florida Department of State - Division of Elections

Florida Election System Reports

Candidate/Committee Lookup

Committee Name: Cable Television Political Action Committee for Florida

Name:

Account: 60679

Election:

Acct:

Type:

| Date Due | Type | Date Filed | Status | Days Late | Fine Assessed | Appealed | Amount Fined | Amount Paid |
|------------|------|------------|--------|-----------|---------------|----------|--------------|-------------|
| 10/10/2017 | M9 | 10/10/2017 | | | | | | |
| 10/6/2017 | SP2 | 10/9/2017 | CLO | 3 | \$0.00 | | \$0.00 | \$0.00 |
| 10/6/2017 | SG2 | 10/9/2017 | CLO | 3 | \$0.00 | | \$0.00 | \$0.00 |
| 9/22/2017 | SG2 | 10/9/2017 | CLO | 17 | \$0.00 | | \$0.00 | \$0.00 |
| 9/22/2017 | M8 | 9/13/2017 | SNT | 0 | \$1,250.00 | | \$1,250.00 | \$0.00 |
| 9/22/2017 | SG2 | 10/9/2017 | SNT | 17 | \$250.00 | | \$250.00 | \$0.00 |
| 9/11/2017 | SG1 | 9/13/2017 | CLO | 2 | \$0.00 | | \$0.00 | \$0.00 |
| 9/11/2017 | SP1 | 9/13/2017 | CLO | 2 | \$0.00 | | \$0.00 | \$0.00 |
| 8/23/2017 | SG1 | 9/13/2017 | CLO | 21 | \$0.00 | | \$0.00 | \$0.00 |
| 8/23/2017 | SG1 | 9/13/2017 | CLO | 21 | \$0.00 | | \$0.00 | \$0.00 |
| 8/11/2017 | SP2 | 9/13/2017 | CLO | 33 | \$0.00 | | \$0.00 | \$0.00 |
| 8/10/2017 | M7 | 8/10/2017 | | | | | | |
| 7/21/2017 | SP2 | 7/21/2017 | | | | | | |
| 7/21/2017 | SP2 | 7/21/2017 | | | | | | |
| 7/10/2017 | SP1 | 7/10/2017 | | | | | | |
| 7/10/2017 | M6 | 7/10/2017 | APP | 0 | \$8,211.00 | | \$8,211.00 | \$0.00 |
| 6/12/2017 | SP1 | 7/21/2017 | CLO | 39 | \$0.00 | | \$0.00 | \$0.00 |
| 6/12/2017 | M5 | 6/13/2017 | CLO | 1 | \$0.00 | | \$0.00 | \$0.00 |
| 6/12/2017 | SP1 | 9/13/2017 | CLO | 93 | \$0.00 | | \$0.00 | \$0.00 |
| 5/10/2017 | M4 | 5/10/2017 | | | | | | |
| 4/10/2017 | M3 | 5/1/2017 | FEC | 21 | \$0.00 | | \$0.00 | \$0.00 |
| 3/11/2017 | M2 | 3/10/2017 | | | | | | |
| 2/10/2017 | M1 | 2/8/2017 | APP | 0 | \$10,882.43 | | \$10,882.43 | \$0.00 |
| 1/10/2017 | M12 | 1/20/2017 | FEC | 10 | \$0.00 | | \$0.00 | \$0.00 |
| 12/12/2016 | M11 | 1/9/2017 | FEC | 28 | \$0.00 | | \$0.00 | \$0.00 |
| 11/4/2016 | D6 | 11/3/2016 | | | | | | |
| 11/4/2016 | G7 | 11/5/2016 | FEC | 1 | \$0.00 | | \$0.00 | \$0.00 |
| 11/2/2016 | D5 | 11/2/2016 | | | | | | |
| 11/1/2016 | D4 | 11/1/2016 | | | | | | |
| 10/31/2016 | D3 | 10/31/2016 | | | | | | |
| 10/30/2016 | D2 | 10/30/2016 | | | | | | |
| 10/29/2016 | D1 | 10/30/2016 | FEC | 1 | \$0.00 | | \$0.00 | \$0.00 |
| 10/28/2016 | G6 | 10/28/2016 | | | | | | |
| 10/21/2016 | G5 | 10/21/2016 | | | | | | |
| 10/14/2016 | G4 | 10/14/2016 | | | | | | |
| 10/7/2016 | G3 | 10/7/2016 | | | | | | |
| 9/30/2016 | G2A | 9/28/2016 | | | | | | |
| 9/23/2016 | G2 | 9/21/2016 | | | | | | |
| 9/16/2016 | G1A | 9/12/2016 | | | | | | |
| 9/9/2016 | G1 | 9/7/2016 | | | | | | |
| 9/2/2016 | P7A | 8/31/2016 | | | | | | |
| 8/26/2016 | P7 | 8/26/2016 | | | | | | |
| 8/19/2016 | P6 | 8/18/2016 | | | | | | |
| 8/12/2016 | P5 | 8/8/2016 | | | | | | |
| 8/5/2016 | P4 | 8/3/2016 | | | | | | |

7/29/2016 P3 7/25/2016
7/22/2016 P2A 7/21/2016
7/15/2016 P2 7/11/2016
7/8/2016 P1A 7/6/2016
7/1/2016 P1 6/27/2016
6/10/2016 M5 6/8/2016
5/10/2016 M4 5/3/2016
4/11/2016 M3 4/6/2016
3/10/2016 M2 3/7/2016
2/10/2016 M1 2/2/2016
1/11/2016 M12 1/6/2016
12/10/2015 M11 12/4/2015
11/10/2015 M10 11/2/2015
10/13/2015 M9 10/5/2015
9/10/2015 M8 9/3/2015
8/10/2015 M7 8/4/2015
7/10/2015 M6 7/7/2015
6/10/2015 M5 6/3/2015
5/11/2015 M4 5/5/2015
4/10/2015 M3 4/6/2015
3/10/2015 M2 3/5/2015
2/10/2015 M1 2/2/2015
1/12/2015 M12 1/5/2015
12/10/2014 M11 12/5/2014
11/10/2014 M10 11/6/2014
10/31/2014 G7 10/31/2014
10/30/2014 D6 10/30/2014
10/29/2014 D5 10/29/2014
10/28/2014 D4 10/28/2014
10/27/2014 D3 10/27/2014
10/26/2014 D2 10/26/2014
10/25/2014 D1 10/24/2014
10/24/2014 G6 10/24/2014
10/17/2014 G5 10/15/2014
10/10/2014 G4 10/9/2014
10/3/2014 G3 10/3/2014
9/26/2014 G2A 9/25/2014
9/19/2014 G2 9/18/2014
9/12/2014 G1A 9/10/2014
9/5/2014 G1 9/3/2014
8/29/2014 P7A 8/28/2014
8/22/2014 P7 8/22/2014
8/15/2014 P6 8/13/2014
8/8/2014 P5 8/6/2014
8/1/2014 P4 7/28/2014
7/25/2014 P3 7/18/2014
7/18/2014 P2A 7/15/2014
7/11/2014 P2 7/8/2014
7/4/2014 P1A 6/30/2014
6/27/2014 P1 6/24/2014
6/10/2014 M5 6/3/2014
5/12/2014 M4 5/5/2014
4/10/2014 M3 4/2/2014
3/10/2014 M2 3/4/2014
2/10/2014 M1 2/3/2014

| | | | | | | | | |
|------------|-----|------------|-----|---|----------|----------|----------|--|
| 1/10/2014 | M12 | 1/6/2014 | | | | | | |
| 12/10/2013 | M11 | 12/3/2013 | | | | | | |
| 11/12/2013 | M10 | 11/8/2013 | | | | | | |
| 10/10/2013 | Q3 | 10/18/2013 | CLO | 8 | \$769.89 | \$125.00 | \$125.00 | |