

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Jay M. Needelman

Case No.: FEC 15-271

TO: Jay M. Needelman
520 West 47th Street
Miami Beach, FL 33140-3028

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

NOTICE OF HEARING (INFORMAL HEARING)

A hearing will be held in this case before the Florida Elections Commission on, **November 16, 2016 at 8:30 am, or as soon thereafter as the parties can be heard**, at the following location: **Senate Office Building, 404 South Monroe Street, Room 110-S, Tallahassee, Florida 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 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
November 1, 2016

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.

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STATE OF FLORIDA
ELECTIONS COMMISSION

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

**Florida Elections Commission,
Petitioner,**

Case No.: FEC 15-271

v.

**Jay M. Needleman
Respondent.**

ORDER OF PROBABLE CAUSE

THIS MATTER was heard by the Florida Elections Commission (Commission) at its regularly scheduled meeting on August 17, 2016, in Tallahassee, Florida.

Based on the Complaint, Report of Investigation, Staff's Recommendation, and oral statements (if any) made at the probable cause hearing, the Commission finds that there is **probable cause** to charge Respondent with the following statutory provisions:

Count 1:

Section 106.07(2)(b)1., Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, failed to timely make necessary amendments to the campaign's 2015 Termination Report.

Count 2:

Section 106.19(1)(b), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, failed to report one or more contributions required to be reported by Chapter 106, Florida Statutes.

Count 3:

Section 106.19(1)(c), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, in the 2014 M1 Report covering the dates of January 1, 2014, through January 31, 2014, that was filed on February 9, 2014, falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes.

Count 4:

Section 106.19(1)(c), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, in the 2014 M2 Report covering the dates of February 1, 2014, through February 28, 2014, that was filed on March 10, 2014, falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes.

Count 5:

Section 106.19(1)(c), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, in the 2014 M3 Report covering the dates of March 1, 2014, through March 31, 2014, that was filed on April 10, 2014, falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes.

Count 6:

Section 106.19(1)(c), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, in the 2014 P6 Report covering the dates of August 2, 2014, through August 8, 2014, that was filed on August 15, 2014, falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes.

Count 7:

Section 106.19(1)(c), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, in the 2014 P7 Report covering the dates of August 9, 2014, through August 21, 2014, that was filed on August 22, 2014, falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes.

Count 8:

Section 106.19(1)(c), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, in the 2014 D1 Report covering the dates of October 18, 2014, through October 24, 2014, that was filed on October 25, 2014, falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes.

Count 9:

Section 106.19(1)(d), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, during the months of August and September of 2014, made or authorized one or more expenditures prohibited by Chapter 106, Florida Statutes.

DONE AND ORDERED by the Florida Elections Commission on August 17, 2016.



M. Scott Thomas, Chairman
Florida Elections Commission

Copies furnished to:
Eric M. Lipman, General Counsel
Jay M. Needleman, Respondent
Division of Elections, Complainant

NOTICE OF RIGHT TO A HEARING

As the Respondent, you may elect to resolve this case in several ways. First, you may elect to resolve this case by consent order where you and Commission staff agree to resolve the violation(s) and agree to the amount of the fine. The consent order is then presented to the Commission for its approval. To discuss a consent order, contact the FEC attorney identified in the Order of Probable Cause.

Second, you may request an informal hearing held before the Commission, if you do not dispute any material fact in the Staff Recommendation. You have 30 days from the date the Order of Probable Cause is filed with the Commission to request such a hearing. The date this order was filed appears in the upper right-hand corner of the first page of the order. At the hearing, you

will have the right to make written or oral arguments to the Commission concerning the legal issues related to the violation(s) and the potential fine. At the request of Respondent, the Commission will consider and determine willfulness at an informal hearing. Otherwise, live witness testimony is unnecessary.

Third, you may request a formal hearing held before an administrative law judge in the Division of Administrative Hearings (DOAH), if you dispute any material fact in the Staff Recommendation. You have 30 days from the date the Order of Probable Cause is filed with the Commission to request such a hearing. The date this order was filed appears in the upper right-hand corner of the first page of the order. At the hearing, you will have the right to present evidence relevant to the violation(s) listed in this order, to cross-examine opposing witnesses, to impeach any witness, and to rebut the evidence presented against you.

If you do not elect to resolve the case by consent order or request a formal hearing at the DOAH or an informal hearing before the Commission within 30 days of the date this Order of Probable Cause is filed with the Commission, the case will be sent to the Commission for a formal or informal hearing, depending on whether the facts are in dispute. The date this order was filed appears in the upper right-hand corner of the first page of the order.

To request a hearing, please send a written request to the Commission Clerk, Donna Ann Malphurs. The address of the Commission Clerk is 107 W. Gaines Street, Collins Building, Suite 224, Tallahassee, Florida 32399-1050. The telephone number is (850) 922-4539. The Clerk will provide you with a copy of Chapter 28-106, *Florida Administrative Code*, and other applicable rules upon request. No mediation is available.

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Jay M. Needelman

Case No.: FEC 15-271

STAFF RECOMMENDATION FOLLOWING INVESTIGATION

Pursuant to section 106.25(4)(c), Florida Statutes, undersigned staff counsel files this written recommendation for disposition of the referral in this case recommending that there is **probable cause** to charge Respondent with violating **Section 106.07(2)(b)1., Florida Statutes, Section 106.19(1)(b), Florida Statutes, Section 106.19(1)(c), Florida Statutes, and Section 106.19(d), Florida Statutes**. Based upon a thorough review of the Report of Investigation submitted on May 24, 2016, the following facts and law support this staff recommendation:

1. On March 10, 2015, the Florida Elections Commission ("Commission") received a referral from the Department of State, Division of Elections, alleging that Jay M. Needelman, ("Respondent") violated Chapter 106, Florida Statutes.
2. Respondent was the treasurer for William Rankin, a candidate for Chief Financial Officer in the 2014 elections, who was defeated in the general election held on November 4, 2014.
3. Complainant is the Division of Elections.
4. Mr. Rankin's filing officer was Kristi Reid-Bronson, Chief, Bureau of Election Records.
5. By letter dated March 24, 2015, the Executive Director notified Respondent that Commission staff would investigate the following statutory provisions:

Section 106.07(2)(b)1., Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, failed to timely make necessary amendments to the campaign's 2015 TR report, as alleged in the complaint.

Section 106.19(1)(b), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, failed to report one or more contributions required to be reported by Chapter 106, Florida Statutes, as alleged in the complaint.

Section 106.19(1)(c), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, as alleged

in the complaint.

Section 106.19(1)(d), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, made or authorized one or more expenditures prohibited by Chapter 106, Florida Statutes, as alleged in the complaint.

Alleged Violation: Section 106.07(2)(b)1., Florida Statutes

6. Section 106.07, Florida Statutes, address the certification and filing of reports. Section 106.07(2)(b)1., Florida Statutes, states in pertinent part:

Any **report** that is **deemed** to be **incomplete** by the **officer** with whom the candidate qualifies must be **accepted** on a **conditional** basis. The campaign **treasurer** shall be **notified** by **certified mail** or by another method using a common carrier that provides a proof of delivery of the notice as to why the report is incomplete and **within 7 days after receipt** of such notice **must file** an **addendum** to the report **providing all information necessary to complete the report** in compliance with this section. **Failure to file a complete report after such notice constitutes a violation** of this chapter. (Emphasis added)

7. Section 106.07(5), Florida Statutes, provides in pertinent part:

The candidate and his or her campaign **treasurer**, in the case of a candidate, or the political committee chair and campaign treasurer of the committee, in the case of a political committee, **shall certify** as to the **correctness of each report; and** each person so certifying **shall bear the responsibility for the accuracy and veracity** of each report. Any campaign treasurer, candidate, or political committee chair who willfully certifies the correctness of any report while knowing that such report is incorrect, false, or incomplete commits a misdemeanor of the first degree, punishable as provided in s. 775.082 or s. 775.083. (Emphasis added)

8. On October 9, 2013, Mr. Rankin filed an Appointment of Campaign Treasurer and Designation of Campaign Depository (DS-DE 9) form appointing Respondent treasurer of his campaign. In this document Respondent signed his Treasurer's Acceptance of Appointment on October 5, 2013. (ROI Exhibit 1)¹

9. On October 10, 2013, Ms. Bronson sent Mr. Rankin a letter acknowledging that he had been placed on the active candidate list; a copy of this letter was sent to Respondent as

¹ The Report of Investigation is referred to herein as "ROI."

treasurer. The letter advised Respondent that all candidates filing reports with the Division are required to use the electronic filing system ("EFS"). Ms. Bronson provided Mr. Rankin and Respondent with a user identification number and initial password allowing them access to the EFS. (ROI Exhibit 2)

10. Ms. Bronson also informed Mr. Rankin and Respondent that all of the Division's publications and reporting forms are available on their website and further advised him to print a copy of Chapters 104 and 106, Florida Statutes, *2012 Candidate and Campaign Treasurer Handbook*, *2013 Calendar of Reporting Dates*, and Rule 1S-2.017, Florida Administrative Code, and that it was his responsibility to read, understand, and follow the requirements of Florida's election laws. (ROI Exhibit 2)

11. On February 2, 2015, Mr. Rankin's 2015 Termination Report was timely filed as indicated by his filing history. (ROI Exhibit 3)

12. On February 5, 2015, however, the Division sent Respondent a letter² informing him that the 2015 Termination Report was incomplete. The letter included an attachment with an error report reflecting the incorrect reporting of a refund and missing dollar amounts and was mailed to Respondent at the address listed on Mr. Rankin's DS-DE 9 form. (ROI Exhibit 4)

13. On February 12, 2015, Mr. Rankin's 2015 TR was amended to address the aforementioned incompleteness and included the correct reporting of a refund and missing dollar amounts.³ This amendment was timely filed seven days after the first notice was mailed. (ROI Exhibit 5)

14. On February 19, 2015, the Division mailed Respondent a letter informing him that the 2015 Termination Report was incomplete. (ROI Exhibit 6) The letter was sent via United States Postal Service ("USPS") certified mail under tracking number 9114 9999 4423 8939 8827 33, and according to the USPS online tracking website, it was received on February 23, 2015. The letter provided Respondent with a contact telephone number if he needed assistance in filing the amendment; it also included an attachment with a compliance report referencing a deficit balance and further informed Respondent that:

"you have 7 days from receipt of this letter to correct errors or provide missing information. If the information has been reported accurately, you must provide a written explanation to the Division addressing the issue noted in the error report. Please be advised that if you fail to comply with this request, the Division will forward this matter to the Florida Elections Commission for further

² Pursuant to Section 106.021(2)(b)1., Florida Statutes, within seven days after receipt of this letter, Respondent "must file an addendum to the report providing all information necessary to complete the report in compliance with this section. Failure to file a complete report after such notice constitutes a violation of this chapter."

³ When an amendment is made to a report filed on the Division's electronic filing system, the report displays both the original and amended information on the same report rather than creating separate original and amended reports.

action. Section 106.265(1), Florida Statutes, authorizes the Florida Elections Commission to impose civil penalties of up to \$1,000 per violation.”

15. On March 10, 2015, Commission staff sent a copy of the complaint to Respondent at his address of record on the DS-DE 9 form.

16. On March 21, 2015, Respondent sent Commission staff an email response to the complaint. Respondent explained he had delayed “medically required back surgery” until after the election “in order not to be incapacitated during a crucial time.” Respondent added that he elected to have his surgery in January and that he had been unable to work due to his surgeon’s order until the middle of March 2015. Respondent stated, “I was physically unable to remedy the indicated errors in the initial time allotted, however, am happy to confirm that these errors have indeed been corrected via amendment as of March 21, 2015.” (ROI Exhibit 17)

17. On March 24, 2015, as previously noted, the Executive Director notified Respondent that Commission staff would investigate the following statutory provisions as alleged in the complaint: Section 106.07(2)(b)1., Florida Statutes, Section 106.19(1)(b), Florida Statutes, Section 106.19(1)(c), Florida Statutes, and Section 106.19(1)(d) Florida Statutes.

18. On March 31, 2015, Respondent wrote an additional response and reiterated his prior comments regarding surgery, the time for recovery, and added, “I respectfully ask for relief from the Florida Elections Commission due to the impossibility for me to carry out my duties in the critical time frame allotted.” (ROI Exhibit 19)

19. On April 9, 2015, Ms. Bronson emailed Commission staff that the campaign’s termination report is not in compliance. According to Ms. Bronson, “He made changes, but has not filed the reports that he changed. They are sitting in pending.” (ROI Exhibit 18)

20. On March 8, 2016, Commission staff sent Respondent an Affidavit of Background Information. The affidavit asked about unreported contributions and expenditures and the discrepancies between information that was reported in the campaign treasurer reports and information from the records of the campaign account. The questionnaire-affidavit was due on March 28, 2016. As of the date of this recommendation, staff has not received the completed affidavit from Respondent, nor has it been returned by the post office.

21. On May 11, 2016, Ms. Bronson stated in a telephone interview that the 2015 Termination Report has not been corrected relative to the directive addressed in the letter dated February 19, 2015. She further stated the Termination Report remains incorrect and that Respondent has never provided an explanation for the deficit balance as shown in the Termination Report.

22. On May 11, and May 16, 2016, Commission staff telephoned Respondent at the telephone number provided on the DS-DE 9 form and left voice-mail messages asking

Respondent to return the calls for the purpose of reviewing the report of investigation with him. As of the date of this recommendation, Respondent has not returned those calls.

23. It appears Mr. Rankin's 2015 Termination Report was timely amended in response to the notice Respondent received in the Division's letter of February 5, 2015. However, that report was not timely amended after Respondent received notice that it was incomplete due to a deficit balance referenced in the Division's letter of February 19, 2015. Respondent's purported corrections filed on March 21, 2015, not only were untimely, but according to Ms. Bronson, the filing remains incorrect and Respondent has never provided an explanation for the deficit balance as shown in the Termination Report.

Alleged Violation of Section 106.19(1)(b), Florida Statutes

24. Section 106.19, Florida Statutes, addresses violations of this chapter by candidates, persons connected with campaigns, and political committees. As to the parameters of the instant complaint, it states in pertinent part:

(1) Any candidate; campaign manager, campaign **treasurer**, or deputy treasurer of any candidate; committee chair, vice chair, campaign treasurer, deputy treasurer, or other officer of any political committee; agent or person acting on behalf of any candidate or political committee; or other person who **knowingly and willfully**:

(a) Accepts a contribution in excess of the limits prescribed by s. 106.08;

(b) **Fails to report** any **contribution required to be reported** by this chapter;

(c) **Falsely reports** or **deliberately fails to include** any **information required** by this chapter; or

(d) **Makes or authorizes** any **expenditure in violation** of s. 106.11(4) or any other expenditure prohibited by this chapter;

is guilty of a misdemeanor of the first degree, punishable as provided in s. 775.082 or s. 775.083

25. Thus, under Section 106.19(1)(b), Florida Statutes, a campaign treasurer, who knowingly and willfully, does not list a required to be reported contribution, is in violation of Florida's election laws.

26. On February 19, 2015, Complainant generated a "Sum of Contributions vs Expenditures" sheet which was provided with the referral; it reflects a negative balance of \$160.98 at the conclusion of Mr. Rankin's campaign. Based on the sheet, Complainant alleged that Respondent may have failed to report contributions. (ROI Exhibit 7)

27. Based on the above as to contributions, Commission staff secured the campaign account records from the designated campaign depository and compared the bank records to campaign reports. The contributions that were not reported are summarized below in Table 1.

TABLE 1: UNREPORTED CONTRIBUTIONS				
Report	Cover period	Contributions Not Reported	Total	ROI Exhibit #
2014 M1	01/01/14 – 01/31/14	1	\$15.00	8
2014 P6	08/02/14 – 08/08/14	9 ⁴	\$680.00	9
2014 P7	08/09/14 – 08/21/14	1 ⁵	\$100.00	10
TOTAL		11	\$795.00	

Alleged Violation of Section 106.19(1)(c), Florida Statutes

28. As previously indicated, under Section 106.19(1)(c), Florida Statutes, a campaign treasurer, who knowingly and willfully, files a false report or deliberately fails to include any required information, is in violation of Florida's election laws.

29. The "Sum of Contributions vs Expenditures" sheet generated by Complainant also raised concerns as to expenditures relative to the above section of law. Accordingly, Complainant alleged Respondent may have failed to disclose information on the campaign treasurer's reports.

30. When Commission staff compared the bank records from the designated campaign depository to the campaign reports, staff noted that it appeared that the campaign did not report three expenditures. The expenditures that were not reported are summarized below in Table 2.

TABLE 2: UNREPORTED EXPENDITURES				
Report	Cover period	Expenditures Not Reported	Total	ROI Exhibit #
2014 M3	03/01/14 – 03/31/14	1	\$650.00	11
2014 P7	08/09/14 – 08/21/14	3	\$197.60	12
TOTAL		4	\$847.60	

⁴ Four of the contributions are cash: One for \$40 and three for \$100 each.

⁵ One cash deposit in the amount of \$100.

31. When Commission staff compared the campaign account records from the designated campaign depository to the campaign reports, it appeared that information in certain campaign reports was either falsely reported or not reported. A comparison of the information on the campaign reports with the bank records from the designated campaign depository are summarized below in Table 3.

(NOTE: Certain entries in the 2014 M1, M3, P6, and P7 Reports in Table 3, identified with the words, "Not reported" under the column "Information on CTR," were previously referred to in Table 1 and 2 as unreported contributions or unreported expenditures.)

TABLE 3: COMPARISON OF RESPONDENT'S CTRs WITH BANK RECORDS			
Date Filed ROI Exhibit	Reporting Period	Information on CTR	Information from bank
02/09/14 ROI Exhibit 8	01/01 to 01/31/14 2014 M1	<ul style="list-style-type: none"> • \$99.99 contribution from Barbara Schwartz on 01/29/14. • Not reported. 	<ul style="list-style-type: none"> • The bank has no record of this contribution. • \$15.00 check from Barbara Schwartz dated 01/21/14.
03/10/14 ROI Exhibit 13	02/01 to 02/28/14 2014 M2	<ul style="list-style-type: none"> • \$20.12 expenditure to La Hacienda on 02/01/14. • \$17.98 expenditure to La Hacienda on 02/01/14. 	<ul style="list-style-type: none"> • No check was found nor any matching withdrawal/debit. • No check was found nor any matching withdrawal/debit.
04/10/14 ROI Exhibit 11	03/01 to 03/31/14 2014 M3	<ul style="list-style-type: none"> • \$10.00 expenditure to Chevron on 03/03/14. • Not reported. 	<ul style="list-style-type: none"> • No check was found nor any matching withdrawal/debit. • Check #1004 issued to Broward County Democratic Party on 03/15/14 in the amount of \$650.00.
08/15/14 ROI Exhibit 9	08/02 to 08/08/14 2014 P6	<ul style="list-style-type: none"> • Not reported. • Not reported. • Not reported. • Not reported. • Not reported. • Not reported. • Not reported. 	<ul style="list-style-type: none"> • \$40-cash deposit on 08/08/14. • \$100 check from Ronald Schulte on 08/06/14. • \$40 check from James S. Falvo on 08/06/14. • \$100 check from Stuart A. Williams on 08/04/14. • \$50 check from Welter Law Firm on 08/06/14. • \$50 check from ICORP3 LLC on 08/08/14. • \$100-cash deposit on 08/08/14.

		<ul style="list-style-type: none"> • Not reported. • Not reported. • \$100 contribution from Phillip Morton on 08/08/14. • \$100 contribution from Sonia Stewart on 08/08/14. • \$100 contribution from Kenneth Evans on 08/08/14. • \$50 contribution from Marlene Gargan on 08/08/14. • \$330 contribution from Irene Ruzzo on 08/08/14. 	<ul style="list-style-type: none"> • \$100-cash deposit on 08/08/14. • \$100-cash deposit on 08/08/14. • The bank has no record of this contribution. • The bank has no record of this contribution. • The bank has no record of this contribution. • The bank has no record of this contribution⁶. • The bank has no record of this contribution⁷.
08/22/14 ROI Exhibit 10 & 12	08/09 to 08/21/14 2014 P7	<ul style="list-style-type: none"> • \$100 contribution from Roderick Mobley on 08/15/14. • Not reported. 	<ul style="list-style-type: none"> • The bank has no record of this contribution. • \$100-cash deposit on 08/15/14.
		<ul style="list-style-type: none"> • Not reported. • \$8.12 expenditure to Hess on 08/12/14. • Not reported. • Not reported. 	<ul style="list-style-type: none"> • Withdrawal/debit on 08/11/14 to Marathon for \$25.99. • No check was found nor any matching withdrawal/debit. • Withdrawal/debit on 08/09/14 to Hess for \$21.61. • Withdrawal/debit on 08/21/14 to PBC Dems for \$150.00.
10/25/14 ROI Exhibit 14	10/18 to 10/24/14 2014 D1	<ul style="list-style-type: none"> • \$60 contribution from Julie Ford on 10/24/14. 	<ul style="list-style-type: none"> • The bank has no record of this contribution.

⁶ The bank does have a record of two other checks from Marlene Gargan: \$25.00 check dated 10/26/13 and a \$100 check dated 01/20/14.

⁷ The bank does have a record of a check from Irene Ruzzo in the amount of \$99.00, dated 01/19/14.

Alleged Violation of Section 106.19(1)(d), Florida Statutes

32. As previously stated, under Section 106.19(1)(d), Florida Statutes, a campaign treasurer, who knowingly and willfully, makes or authorizes any expenditure in violation of Section 106.11(4), Florida Statutes, is in violation of Florida's election laws.

33. Section 106.11, Florida Statutes, addresses expenses of and expenditures by candidates and political committees. Section 106.11(4), Florida Statutes, states in pertinent part:

No candidate, campaign manager, **treasurer**, deputy treasurer, or political committee or any officer or agent thereof, or any person acting on behalf of any of the foregoing, **shall authorize any expenses**, nor shall any campaign treasurer or deputy treasurer sign a check drawn on the primary campaign account for any purpose, **unless there are sufficient funds on deposit** in the primary depository account of the candidate or political committee **to pay** the full amount of **the authorized expense**, to honor all other checks drawn on such account, which checks are outstanding, and to meet all expenses previously authorized but not yet paid.
(Emphasis added)

34. Commission staff reviewed the bank records from the designated campaign depository. The records reflected that the campaign had expenditures when funds were unavailable, which indicates that these were prohibited expenditures. Expenditures that occurred when funds were unavailable in the campaign account are summarized below in Table 4. (NOTE: The "Transaction Date" used in the table is reflective of the date the check card purchase was made and not the date it posted to the account; thus, the "Funds on Deposit" will not correspond with the monthly bank statements.⁸) (ROI Exhibit 15)

TABLE 4: PROHIBITED EXPENDITURES					
Transaction Date	Expenditure To	Expenditure Type	Reason Prohibited	Amount	Funds on Deposit
08/29/14	Funds available in the campaign account				\$231.41
08/29/14	Lake Ave BP	Check-card purchase		\$51.03	\$180.38
08/29/14	Joy Noodles & Rice	Check-card purchase		\$57.66	\$122.72
08/29/14		Maintenance Fee		\$20.00	\$102.72

⁸ The bank statement for 09/01 – 09/30/14 shows a negative balance on 09/02/14 after a number of check card purchases were posted to the account.

08/30/14	COH Meter Pkg	Check-card purchase		\$2.00	\$100.72
08/30/14	Enterprise Car Tolls	Check-card purchase		\$6.70	\$94.02
08/30/14	Office Depot	Check-card purchase		\$23.30	\$70.72
08/30/14	Brio Pembroke Pines	Check-card purchase		\$26.90	\$43.82
08/31/14	Facebook	Recurring Check-card purchase	Funds unavailable in account	\$163.88	(\$120.06)
09/02/14	Respondent was charged an overdraft fee of \$380.00 ⁹				(\$500.06)
09/02/14	Reversal of Overdraft Item Fee \$266.00				(\$234.06)
09/04/14	Office Depot	Check-card purchase	Funds unavailable in account	\$126.43	(\$360.49)
09/05/14	Miscellaneous Deposit \$2,000.00				\$1,639.51

35. On March 3, 2014, in *Florida Elections Commission v. William D. Rankin*, Case Number FEC 13-313, FOEC 15-021W, the Commission staff received an Affidavit of Information from Mr. Needelman in which he indicated that he was asked to serve as treasurer by the candidate and that he had been a Certified Public Account for about 10 years.

36. In describing the duties and functions he performed as campaign treasurer, Mr. Needelman wrote: "Monthly reporting to Div. of Elections. Bookkeeping. Custodian of financial records. Custodian of checkbook."

37. In explaining the process that was in place to ensure that each campaign report is true, correct, and accurate prior to submitting it, Mr. Needelman wrote: "I obtain original receipts, invoices and bank statements. I also have records of canceled check images and debit card statements."

38. In addition, Mr. Needelman indicated that he personally reviewed each campaign report with Mr. Rankin prior to certifying that each report was true, correct and complete. In examining a report prior to his filing, Mr. Needelman stated: "We look for numerical accuracy and categorical accuracy."

39. Despite the procedures and safeguards mentioned in the affidavit of March 2014, Tables 1, 2, and 3 suggest significant problems in the truth, accuracy, and completeness of a

⁹ According to a representative with Sun Trust, the \$380 overdraft fee represents 10 separate charges of \$38 fees rather than a single fee in the amount of \$380. Based on the bank statement, it appears the fees applied to ten transactions that posted to the account on September 2, 2014.

number of campaign treasurer's reports. Given the apparent gravity and recurring history of the acts and omissions in the instant case, Respondent's lack of response to the Division and the Commission staff's requests for contact and information as to his duties and responsibilities as Campaign Treasurer in the instant matter appears to offer little in terms of mitigating factors.

40. "Probable Cause" is defined as reasonable grounds of suspicion supported by circumstances sufficiently strong to warrant a cautious person in the belief that the person has committed the offense charged. *Schmitt v. State*, 590 So.2d 404, 409 (Fla. 1991). Probable cause exists where the facts and circumstances, of which an [investigator] has reasonably trustworthy information, are sufficient in themselves for a reasonable man to reach the conclusion that an offense has been committed. *Department of Highway Safety and Motor Vehicles v. Favino*, 667 So.2d 305, 309 (Fla. 1st DCA 1995)

The facts set forth above show that Respondent was the Campaign Treasurer for William Rankin, a candidate for Chief Financial Officer in the 2014 elections, Section 106.07(5), Florida Statutes, mandates that the campaign treasurer certify the correctness of each report, and in doing so, bears the responsibility for the accuracy and veracity of each report. The information presented clearly demonstrates more than mere incorrectness.

Based upon these facts and circumstances, I recommend that the Commission find **probable cause** to charge Respondent with violating the following statutory provisions:

Count 1:

Section 106.07(2)(b)1., Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, failed to timely make necessary amendments to the campaign's 2015 TR report, as alleged in the complaint.

Count 2:

Section 106.19(1)(b), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, failed to report one or more contributions required to be reported by Chapter 106, Florida Statutes, as alleged in the complaint.

Count 3:

Section 106.19(1)(c), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, in the 2014 M1 Report covering the dates of January 1, 2014, through January 31, 2014, that was filed on February 9, 2014, falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, as alleged in the complaint.

Count 4:

Section 106.19(1)(c), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, in the 2014 M2 Report covering the dates of February 1, 2014, through February 28, 2014, that was filed on March 10, 2014, falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, as alleged in the complaint.

Count 5:

Section 106.19(1)(c), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, in the 2014 M3 Report covering the dates of March 1, 2014, through March 31, 2014, that was filed on April 10, 2014, falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, as alleged in the complaint.

Count 6:

Section 106.19(1)(c), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, in the 2014 P6 Report covering the dates of August 2, 2014, through August 8, 2014, that was filed on August 15, 2014, falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, as alleged in the complaint.

Count 7:

Section 106.19(1)(c), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, in the 2014 P7 Report covering the dates of August 9, 2014, through August 21, 2014, that was filed on August 22, 2014, falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, as alleged in the complaint.

Count 8:

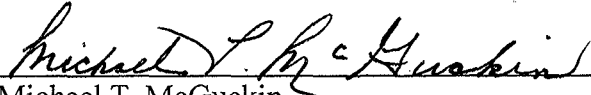
Section 106.19(1)(c), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, in the 2014 D1 Report covering the dates of October 18, 2014, through October 24, 2014, that was filed on October 25, 2014, falsely reported or deliberately failed to include information

required by Chapter 106, Florida Statutes, as alleged in the complaint.

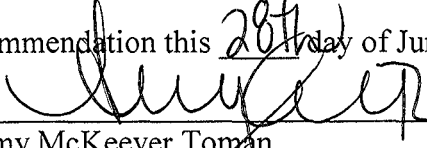
Count 9:

Section 106.19(1)(d), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, during the months of August and September of 2014, made or authorized one or more expenditures prohibited by Chapter 106, Florida Statutes, as alleged in the complaint.

Respectfully submitted on June 28, 2016.


Michael T. McGuckin
Assistant General Counsel

I reviewed this Staff Recommendation this 28th day of June, 2016.


Amy McKeever Toman
Executive Director

FLORIDA ELECTIONS COMMISSION
REPORT OF INVESTIGATION
Case No.: FEC 15-271

Respondent: Jay M. Needelman

Complainant: Division of Elections

Pursuant to Section 106.25, Florida Statutes, on March 10, 2015, the Florida Elections Commission received information from the Division of Elections alleging that Respondent violated Chapter 106, Florida Statutes. The Division's referral was mandated pursuant to Section 106.07(8)(d), Florida Statutes. Commission staff, therefore, investigated whether Respondent violated the following statutes:

Section 106.07(2)(b)1, Florida Statutes, failure of the treasurer of a candidate to timely file an addendum to an incomplete report after receiving notice from the filing officer;

Section 106.19(1)(b), Florida Statutes, failure of a person or organization to report a contribution required to be reported by Chapter 106, Florida Statutes;

Section 106.19(1)(c), Florida Statutes, prohibiting a person or organization from falsely reporting or deliberately failing to report information required by Chapter 106, Florida Statutes; and

Section 106.19(1)(d), Florida Statutes, prohibiting a person or organization from making or authorizing any expenditure prohibited by Chapter 106, Florida Statutes.

I. Preliminary Information:

1. Respondent, Jay M. Needelman, was the treasurer for William Rankin, a candidate for Chief Financial Officer in the 2014 elections. Mr. Rankin was defeated in the general election held on November 4, 2014.

2. Complainant is the Division of Elections.

3. Mr. Rankin's filing officer was Kristi Reid-Bronson, Chief, Bureau of Election Records.

4. On October 9, 2013, Mr. Rankin filed an Appointment of Campaign Treasurer and Designation of Campaign Depository (DS-DE 9) form appointing Respondent treasurer of Mr. Rankin's campaign. To view a copy of the DS-DE 9 form, please refer to Exhibit 1.

5. On October 10, 2013, Ms. Bronson sent Mr. Rankin a letter acknowledging he had been placed on the active candidate list—Respondent was sent a copy of the letter as the

treasurer. The letter advised Respondent that all candidates filing reports with the Division are required to use the electronic filing system (EFS). Respondent was provided with a user identification number and initial password allowing him access to the EFS.

6. The letter also advised Respondent that all of the Division's publications and reporting forms are available on their website, including Chapter 106, Florida Statutes, the *Candidate and Campaign Treasurer Handbook*, and the Calendar of Reporting Dates. The letter further advised Respondent that it was his responsibility to read, understand, and follow the requirements of Florida's election laws. To view a copy of the acknowledgement letter, please refer to Exhibit 2.

II. Alleged Violation of Section 106.07(2)(b)1, Florida Statutes:

7. I investigated whether Respondent violated this section of elections laws by not timely amending Mr. Rankin's 2015 Termination Report after receiving notice that the report was incomplete.

8. According to Mr. Rankin's filing history, Mr. Rankin's 2015 Termination Report was timely filed on February 2, 2015. To view a copy of Mr. Rankin's filing history, please refer to Exhibit 3.

9. On February 5, 2015, the Division sent Respondent a letter informing him that Mr. Rankin's 2015 Termination Report was incomplete. An error report reflecting the incorrect reporting of a refund and missing dollar amounts on Mr. Rankin's 2015 Termination Report was included with the letter as an attachment. The letter was mailed to Respondent at the address listed on Mr. Rankin's DS-DE 9 form (Exhibit 1). To view a copy of the February 5, 2015 letter and error report, please refer to Exhibit 4.

10. On February 12, 2015, Mr. Rankin's 2015 TR was amended to include the correct reporting of a refund and missing dollar amounts.¹ The amendment was filed seven days after the first notice was mailed. To view a copy of Mr. Rankin's amended termination report, please refer to Exhibit 5.

11. On February 19, 2015, the Division sent Respondent a letter informing him that the 2015 Termination Report was incomplete. A compliance report referencing a deficit balance was included with the letter as an attachment. The letter was mailed to Respondent at the address listed on Mr. Rankin's DS-DE 9 form (Exhibit 1). To review a copy of the February 19, 2015 letter and compliance report, please refer to Exhibit 6.

12. In a telephone interview on May 11, 2016, Ms. Bronson stated that the 2015 Termination Report has not been corrected relative to the directive addressed in the letter dated February 19, 2015. Ms. Bronson further stated the Termination Report remains incorrect and that Respondent has never provided an explanation for the deficit balance as shown in the Termination Report.

¹ When an amendment is made to a report filed on the Division's electronic filing system, the report displays both the original and amended information on the same report rather than creating separate original and amended reports.

13. Based upon review of the Division's notice (Exhibit 4) and the amended termination report (Exhibit 5), it appears Mr. Rankin's 2015 Termination Report was timely amended after Respondent received notice that the report was incomplete relative to the February 5, 2015 letter. However, the 2015 Termination Report was not timely amended after Respondent received notice that the report was incomplete due to a deficit balance relative to the February 19, 2015 letter.

14. No record of Respondent having previously violated this section of law was found.

III. Alleged Violation of Section 106.19(1)(b), Florida Statutes:

15. I investigated whether Respondent violated this section of election laws by failing to report contributions.

16. Complainant provided with their referral a Sum of Contributions vs Expenditures sheet which reflects a negative balance of \$160.98 at the conclusion of Mr. Rankin's campaign. Based on the sheet, Complainant alleges Respondent may have failed to report contributions. To review a copy of the Sum of Contributions vs Expenditures sheet, please refer to Exhibit 7.

17. I secured the campaign account records from the designated campaign depository and compared the bank records to campaign reports. Table 1 summarizes the contributions that were not reported.

TABLE 1: UNREPORTED CONTRIBUTIONS				
Report	Cover period	Contributions Not Reported	Total	Exhibit #
2014 M1	01/01/14 – 01/31/14	1	\$15.00	8
2014 P6	08/02/14 – 08/08/14	9 ²	\$680.00	9
2014 P7	08/09/14 – 08/21/14	1 ³	\$100.00	10
TOTAL		11	\$795.00	

18. No record of Respondent having previously violated this section of law was found.

IV. Alleged Violation of Section 106.19(1)(c), Florida Statutes:

19. I investigated whether Respondent violated this section of the election laws by

² Four of the contributions are cash: One for \$40 and three for \$100 each.

³ One cash deposit in the amount of \$100.

falsely reporting or failing to disclose information on campaign treasurer's reports.

20. Based on the deficit balance reflected in the Sum of Contributions vs Expenditures (Exhibit 7), Complainant alleged Respondent may have failed to disclose information on the campaign treasurer's reports.

21. As to contributions that were not reported, refer to Table 1.

22. While comparing the campaign's bank records to the campaign reports, it appears that the campaign did not report three expenditures. Table 2 summarizes the expenditures that were not reported.

TABLE 2: UNREPORTED EXPENDITURES				
Report	Cover period	Expenditures Not Reported	Total	Exhibit #
2014 M3	03/01/14 – 03/31/14	1	\$650.00	11
2014 P7	08/09/14 – 08/21/14	3	\$197.60	12
TOTAL		4	\$847.60	

23. While comparing the campaign's bank records to the campaign reports, it appears that information in a number of campaign reports was either falsely reported or not reported. Table 3 compares information on the campaign reports with the bank records from the campaign account. Certain entries in the 2014 M1, M3, P6, and P7 Reports in Table 3, noted with the words, "Not reported" under the column "Information on CTR," have previously been alluded to in Table 1 and 2 as unreported contributions or unreported expenditures.

TABLE 3: COMPARISON OF RESPONDENT'S CTRs WITH BANK RECORDS			
Date Filed	Reporting Period	Information on CTR	Information from bank
02/09/14	01/01 to 01/31/14 2014 M1	<ul style="list-style-type: none"> • \$99.99 contribution from Barbara Schwartz on 01/29/14. • Not reported. 	<ul style="list-style-type: none"> • The bank has no record of this contribution. • \$15.00 check from Barbara Schwartz dated 01/21/14.
03/10/14	02/01 to 02/28/14 2014 M2	<ul style="list-style-type: none"> • \$20.12 expenditure to La Hacienda on 02/01/14. • \$17.98 expenditure to La Hacienda on 02/01/14. 	<ul style="list-style-type: none"> • No check was found nor any matching withdrawal/debit. • No check was found nor any matching withdrawal/debit.

04/10/14	03/01 to 03/31/14 2014 M3	<ul style="list-style-type: none"> • \$10.00 expenditure to Chevron on 03/03/14. • Not reported. 	<ul style="list-style-type: none"> • No check was found nor any matching withdrawal/debit. • Check #1004 issued to Broward County Democratic Party on 03/15/14 in the amount of \$650.00.
08/15/14	08/02 to 08/08/14 2014 P6	<ul style="list-style-type: none"> • Not reported. • Not reported. • Not reported. • Not reported. • Not reported. • Not reported. • Not reported. • Not reported. • \$100 contribution from Phillip Morton on 08/08/14. • \$100 contribution from Sonia Stewart on 08/08/14. • \$100 contribution from Kenneth Evans on 08/08/14. • \$50 contribution from Marlene Gargan on 08/08/14. • \$330 contribution from Irene Ruzzo on 08/08/14. 	<ul style="list-style-type: none"> • \$40-cash deposit on 08/08/14. • \$100 check from Ronald Schulte on 08/06/14. • \$40 check from James S. Falvo on 08/06/14. • \$100 check from Stuart A. Williams on 08/04/14. • \$50 check from Welter Law Firm on 08/06/14. • \$50 check from ICORP3 LLC on 08/08/14. • \$100-cash deposit on 08/08/14. • \$100-cash deposit on 08/08/14. • \$100-cash deposit on 08/08/14. • The bank has no record of this contribution. • The bank has no record of this contribution. • The bank has no record of this contribution. • The bank has no record of this contribution⁴. • The bank has no record of this contribution⁵.
08/22/14	08/09 to 08/21/14 2014 P7	<ul style="list-style-type: none"> • \$100 contribution from Roderick Mobley on 08/15/14. • Not reported. 	<ul style="list-style-type: none"> • The bank has no record of this contribution. • \$100-cash deposit on 08/15/14.

⁴ The bank does have a record of two other checks from Marlene Gargan: \$25.00 check dated 10/26/13 and a \$100 check dated 01/20/14.

⁵ The bank does have a record of a check from Irene Ruzzo in the amount of \$99.00, dated 01/19/14.

		<ul style="list-style-type: none"> • Not reported. • \$8.12 expenditure to Hess on 08/12/14. • Not reported. • Not reported. 	<ul style="list-style-type: none"> • Withdrawal/debit on 08/11/14 to Marathon for \$25.99. • No check was found nor any matching withdrawal/debit. • Withdrawal/debit on 08/09/14 to Hess for \$21.61. • Withdrawal/debit on 08/21/14 to PBC Dems for \$150.00.
10/25/14	10/18 to 10/24/14 2014 D1	<ul style="list-style-type: none"> • \$60 contribution from Julie Ford on 10/24/14. 	<ul style="list-style-type: none"> • The bank has no record of this contribution.

To review the 2014 M1 Report and bank records, refer to Exhibit 8. To review the 2014 M2 Report, refer to Exhibit 13. To review the 2014 M3 Report and bank records, refer to Exhibit 11. To review the 2014 P6 Report and bank records, refer to Exhibit 9. To review the 2014 P7 Report and bank records, refer to Exhibits 10 and 12. To review the 2014 D1 Report, refer to Exhibit 14.

24. No record of Respondent having previously violated this section of law was found.

V. Alleged Violation of Section 106.19(1)(d), Florida Statutes:

25. I investigated whether Respondent violated this section of the election laws by making prohibited expenditures from the campaign account.

26. Review of the bank records reflect that the campaign had expenditures when funds were unavailable; therefore, it appears these were prohibited expenditures. Table 4 summarizes the expenditures that occurred when funds were unavailable in the campaign account. The "Transaction Date" used in the table is reflective of the date the check card purchase was made and not the date it posted to the account; therefore, the "Funds on Deposit" will not correspond with the monthly bank statements⁶.

⁶ The bank statement for 09/01 – 09/30/14 shows a negative balance on 09/02/14 after a number of check card purchases were posted to the account.

TABLE 4: PROHIBITED EXPENDITURES					
Transaction Date	Expenditure To	Expenditure Type	Reason Prohibited	Amount	Funds on Deposit
08/29/14	Funds available in the campaign account				\$231.41
08/29/14	Lake Ave BP	Check-card purchase		\$51.03	\$180.38
08/29/14	Joy Noodles & Rice	Check-card purchase		\$57.66	\$122.72
08/29/14		Maintenance Fee		\$20.00	\$102.72
08/30/14	COH Meter Pkg	Check-card purchase		\$2.00	\$100.72
08/30/14	Enterprise Car Tolls	Check-card purchase		\$6.70	\$94.02
08/30/14	Office Depot	Check-card purchase		\$23.30	\$70.72
08/30/14	Brio Pembroke Pines	Check-card purchase		\$26.90	\$43.82
08/31/14	Facebook	Recurring Check-card purchase	Funds unavailable in account	\$163.88	(\$120.06)
09/02/14	Respondent was charged an overdraft fee of \$380.00 ⁷				(\$500.06)
09/02/14	Reversal of Overdraft Item Fee \$266.00				(\$234.06)
09/04/14	Office Depot	Check-card purchase	Funds unavailable in account	\$126.43	(\$360.49)
09/05/14	Miscellaneous Deposit \$2,000.00				\$1,639.51

To review the bank statements for the months of August and September, refer to Exhibit 15.

27. Although the Sum of Contributions vs Expenditures (Exhibit 7) reflects negative balances in the 2014 G1 Report and 2015 Termination Report, the campaign account records did not reflect any expenditures when funds were unavailable during those reporting periods. The campaign account records did reflect negative balances which transpired during the 2014 G1A reporting period covering August 30 through September 5, 2014, as reflected in Table 4. According to the bank records, the account was closed on March 31, 2015, with a zero balance.

⁷ According to a representative with Sun Trust, the \$380 overdraft fee would be ten separate charges of \$38 fees and not one single fee in the amount of \$380. It appears, based on the bank statement, the fees applied to ten transactions that *posted* to the account on September 2, 2014.

To review the March 2015 bank statement, refer to Exhibit 16.

28. In an e-mail, Respondent filed an initial response to the referral. Respondent explained that he had delayed "medically required back surgery" until after the election "in order not to be incapacitated during a crucial time." Respondent added that he elected to have his surgery in January and that he had been unable to work due to his surgeon's order until the middle of March 2015. Respondent stated, "I was physically unable to remedy the indicated errors in the initial time allotted, however, am happy to confirm that these errors have indeed been corrected via amendment as of March 21, 2015." To review Respondent's e-mail response, refer to Exhibit 17.

29. In an e-mail dated April 9, 2015, Ms. Bronson notified the Commission staff that the campaign's termination report is not in compliance. According to Ms. Bronson, "He made changes, but has not filed the reports that he changed. They are sitting in pending." To review the April 9th e-mail from Ms. Bronson, refer to Exhibit 18.

30. In an additional response, Respondent reiterated his previous comments relative to having to have surgery and the time for recovery. Respondent added, "I respectfully ask for relief from the Florida Elections Commission due to the impossibility for me to carry out my duties in the critical time frame allotted." To review Respondent's additional response, refer to Exhibit 19.

31. As part of his additional response, Respondent noted that he scheduled his surgery for March 2, 2015. However, Ms. Bronson's failure-to-amend letters to Respondent were dated February 5 and February 19, 2015, respectively.

32. Respondent did not respond to a questionnaire-affidavit in which he was asked about the unreported contributions and expenditures and the information that was falsely reported; the questionnaire-affidavit was due on March 28, 2016. As of the date of this report, Respondent has not returned the questionnaire-affidavit and the affidavit has not been returned by the post office.

33. No record of Respondent having previously violated this section of law was found.

VI. FEC History:

34. Respondent has not had any prior cases before the Commission.

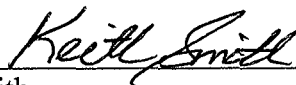
Conclusion:

35. On May 11 and May 16, 2016, I left voice-mail messages asking Respondent to return my calls for the purpose of reviewing the report of investigation with him. As of the date of this report, Respondent has not returned my calls.

36. As per paragraphs 28 and 30, Respondent initially responded to the allegations via e-mail. However, since his initial responses, Respondent has not returned a questionnaire-affidavit nor has he returned my telephone calls.

37. As per paragraph five, as the campaign treasurer for candidate William Rankin, Respondent was sent a copy of the acknowledgement letter from the Division. As per paragraph six, Respondent was notified that the Division's publications, including Chapter 106, Florida Statutes, as well as the *Candidate and Campaign Treasurer Handbook*, was available on the Division's website.

Respectfully submitted on May 24, 2016.



Keith Smith
Investigation Specialist

Current address of Respondent

Jay M. Needelman
520 West 47th Street
Miami Beach, FL 33140-3028

Current address of Complainant

Division of Elections
500 South Bronough Street
Tallahassee, FL 32399

Name and Address of Filing Officer:

Kristi Reid-Bronson, Chief
Bureau of Election Records
500 South Bronough Street
Tallahassee, FL 32399

Copy furnished to: David Flagg, Investigations Manager

FLORIDA ELECTIONS COMMISSION
REPORT OF INVESTIGATION
Jay Needelman -- FEC 15-271

LIST OF EXHIBITS	
Exhibits #s	Description of Exhibits
Exhibit 1	DS-DE 9 form
Exhibit 2	Acknowledgment letter from the Division
Exhibit 3	Candidate Rankin's filing history
Exhibit 4	02/05/15 ltr/error report from the Division
Exhibit 5	TR (amended)
Exhibit 6	02/19/15 letter/compliance report from the Division
Exhibit 7	Sum of Contributions vs. Expenditures
Exhibit 8	2014 M1 report/copy of check
Exhibit 9	2016 P6 report/bank records
Exhibit 10	2014 P7 report/cash-in ticket - contribution
Exhibit 11	2014 M3 report/copy of check
Exhibit 12	2014 P7 report/bank statement - expenditures
Exhibit 13	2014 M2 report
Exhibit 14	2014 D1 report
Exhibit 15	August/September bank statements
Exhibit 16	March 2015 bank statement
Exhibit 17	Respondent's e-mail response
Exhibit 18	E-mail from Kristi Reid-Bronson
Exhibit 19	Respondent's additional response

**APPOINTMENT OF CAMPAIGN TREASURER
AND DESIGNATION OF CAMPAIGN
DEPOSITORY FOR CANDIDATES**

(Section 106.021(1), F.S.)

(PLEASE PRINT OR TYPE)

**NOTE: This form must be on file with the qualifying
officer before opening the campaign account.**

RECEIVED
DEPARTMENT OF STATE
2013 OCT -9 AM 10:13
DIVISION OF ELECTIONS
TALLAHASSEE, FL

OFFICE USE ONLY

1. CHECK APPROPRIATE BOX(ES):

☒ Initial Filing of Form Re-filing to Change: ☐ Treasurer/Deputy ☐ Depository ☐ Office ☐ Party

2. Name of Candidate (in this order: First, Middle, Last)

William Rankin

3. Address (include post office box or street, city, state, zip code)

265 S. Federal Hwy, #258
Deerfield Beach, FL 33441

4. Telephone

(954) 333-8968

5. E-mail address

info@rankin4cfo.com

6. Office sought (include district, circuit, group number)

CHIEF FINANCIAL OFFICER

7. If a candidate for a nonpartisan office, check if applicable:

☐ My intent is to run as a Write-In candidate.

8. If a candidate for a partisan office, check block and fill in name of party as applicable: My intent is to run as a

☐ Write-In ☐ No Party Affiliation ☒ DEMOCRATIC Party candidate

9. I have appointed the following person to act as my ☒ Campaign Treasurer ☐ Deputy Treasurer

10. Name of Treasurer or Deputy Treasurer

Jay M. Needelman, CPA

11. Mailing Address

520 West 47th Street

12. Telephone

(305) 673-5040

13. City

Miami Beach

14. County

Miami-Dade

15. State

FL

16. Zip Code

33140-3028

17. E-mail address

cpa160@aol.com

18. I have designated the following bank as my ☒ Primary Depository ☐ Secondary Depository

19. Name of Bank

Wells Fargo

20. Address

750 Arthur Godfrey Road

21. City

Miami Beach

22. County

Miami-Dade

23. State

FL

24. Zip Code

33140

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING FORM FOR APPOINTMENT OF CAMPAIGN TREASURER AND DESIGNATION OF CAMPAIGN DEPOSITORY AND THAT THE FACTS STATED IN IT ARE TRUE.

25. Date

October 4, 2013

26. Signature of Candidate

X *William Rankin*

27. Treasurer's Acceptance of Appointment (fill in the blanks and check the appropriate block)

I, Jay M. Needelman, CPA, do hereby accept the appointment
(Please Print or Type Name)

designated above as: ☒ Campaign Treasurer ☐ Deputy Treasurer

October 4, 2013

Date

X *Jay M. Needelman*
Signature of Campaign Treasurer or Deputy Treasurer

EXHIBIT



FLORIDA DEPARTMENT of STATE

RICK SCOTT
Governor

KEN DETZNER
Secretary of State

October 10, 2013

William Rankin
265 South Federal Highway, #258
Deerfield Beach, Florida 33441

Dear Mr. Rankin:

This will acknowledge receipt of the Appointment of Campaign Treasurer and Designation of Campaign Depository for the office of Chief Financial Officer, which was placed on file in our office on October 9, 2013. Your name has been placed on the 2014 active candidate list.

Campaign Treasurer's Reports

Your first campaign treasurer's report will be due on **November 12, 2013**. The report will cover the period of October 1-31, 2013 (M10). All candidates who file reports with the Division of Elections are required to file by means of the Division's Electronic Filing System (EFS).

Credentials and Sign-ons

Below is the web address to access the EFS and your user identification number. The enclosed sealed envelope contains your initial password. Once you have logged in using the initial password, you will be immediately prompted to change it to a confidential sign-on. You, your campaign treasurer, and deputy treasurers are responsible for protecting this password from disclosure and are responsible for all filings using these credentials, unless the Division is notified that your credentials have been compromised.

EFS Website Address: <https://efs.dos.state.fl.us>
Identification Number: 61112

EXHIBIT 2 Division of Elections (1 of 3)

R.A. Gray Bldg., Rm. 316 • 500 S Bronough St. • Tallahassee, Florida 32399-0250
Telephone: (850) 245-6240 • Facsimile: (850) 245-6259 elections.myflorida.com
Commemorating 500 years of Florida history www.fl500.com



Mr. William Rankin
October 10, 2013
Page Two

Pin Numbers

Pin numbers are confidential secure credentials that allow you to submit reports and update personal information. The enclosed sealed envelope contains confidential pin numbers for you. By copy of this letter, a confidential pin number to access the EFS was sent to your treasurer.

Each candidate is required to provide the Division of Elections with confidential personal information that may be used to allow access in the event this password is forgotten or lost. When you enter the campaign account screen, there will be a drop down box where you pick a question (such as *What is your mother's maiden name?*) and supply an answer. All passwords and answers to questions are stored as encrypted data and cannot be viewed by Division staff and given out over the phone. Please notify the Division if your credentials have been compromised.

Timely Filing

All reports filed must be completed and filed through the EFS not later than midnight of the due date. Reports not filed by midnight of the due date are late filed and subject to the penalties in Section 106.07(8), Florida Statutes. In the event that the EFS is inoperable on the due date, the report will be accepted as timely filed if filed no later than midnight of the first business day the EFS becomes operable. No fine will be levied during the period the EFS was inoperable.

Any candidate failing to file a report on the designated due date shall be subject to a fine of \$50 per day for the first 3 days late and, thereafter, \$500 per day for each late day, not to exceed 25% of the total receipts or expenditures, whichever is greater, for the period covered by the late report. However, for reports immediately preceding each primary and general election, the fine shall be \$500 per day for each late day, not to exceed 25% of the total receipts or expenditures, whichever is greater, for the period covered by the late report.

Electronic Receipts

The person submitting the report on the EFS will be issued an electronic receipt indicating and verifying the report was filed. Each campaign treasurer's report filed by means of the EFS is considered to be under oath by the candidate and campaign treasurer and such persons are subject to the provisions of Section 106.07(5), Florida Statutes.

EXHIBIT 2 (243)

Mr. William Rankin
October 10, 2013
Page Three

Instructions and Assistance

An online instruction guide is available to you on the EFS to assist with navigation, data entry, and submission of reports. The Division of Elections will also provide assistance to all users by contacting the EFS Help Desk at (850) 245-6280.

All of the Division's publications and reporting forms are available on the Division of Elections' website at <http://elections.myflorida.com>. It is your responsibility to read, understand, and follow the requirements of Florida's election laws. Therefore, please print a copy of the following documents: Chapters 104 and 106, Florida Statutes, *2012 Candidate and Campaign Treasurer Handbook*, *2013 Calendar of Reporting Dates*, and Rule 1S-2.017, Florida Administrative Code.

Please let me know if you need additional information.

Sincerely,



Kristi Reid Bronson, Chief
Bureau of Election Records

KRB/ljr

Enclosures

pc: Mr. Jay M. Needelman, Treasurer

EXHIBIT

2

(3 of 3)


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Florida Department of State - Division of Elections

Florida Election System Reports

Candidate/Committee Lookup

Candidate Name: William "Will" Rankin

Name: Account: 61112

Election:

Acct: Type:

Search

Reset

Date Due	Type	Date Filed	Status	Days Late	Fine Assessed	Appealed	Amount Fined	Amount Paid
2/2/2015	TR	2/2/2015						
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	10/25/2014						
10/24/2014	G6	10/24/2014						
10/17/2014	G5	10/13/2014						
10/10/2014	G4	10/10/2014						
10/3/2014	G3	10/3/2014						
9/26/2014	G2A	9/26/2014						
9/19/2014	G2	9/18/2014						
9/12/2014	G1A	9/12/2014						
9/5/2014	G1	9/4/2014						
8/29/2014	P7A	8/29/2014						
8/22/2014	P7	8/22/2014						
8/15/2014	P6	8/15/2014						
8/8/2014	P5	8/8/2014						
8/1/2014	P4	8/1/2014						
7/25/2014	P3	7/25/2014						
7/18/2014	P2A	7/18/2014						
7/11/2014	P2	7/11/2014						
7/4/2014	P1A	7/4/2014						
6/27/2014	P1	6/27/2014						
6/10/2014	M5	6/10/2014						
5/12/2014	M4	5/10/2014						
4/10/2014	M3	4/10/2014						
3/10/2014	M2	3/10/2014						
2/10/2014	M1	2/9/2014						
1/10/2014	M12	1/10/2014						
12/10/2013	M11	12/11/2013	CLO	1	\$50.00		\$50.00	\$50.00
11/12/2013	M10	11/12/2013						

EXHIBIT

3



FLORIDA DEPARTMENT OF STATE

Ken Detzner
Secretary of State

DIVISION OF ELECTIONS

February 5, 2015

Jay M. Needelman, Treasurer for
Candidate William "Will" Rankin
520 West 47th Street
Miami Beach, FL 33140-3028

Re: CAN 61112

Dear Mr. Needelman:

The Division of Elections has determined that the following report is incomplete for the reasons noted in the attached error report:

<i>Year</i>	<i>Type</i>	<i>Cover Period</i>
2015	TR	10/31/14 - 2/2/15

Pursuant to Section 106.07(2), Florida Statutes, you have 7 days from receipt of this notice to file an amended report to correct errors or provide missing information. If the information has been reported accurately, provide a written explanation to the Division addressing the issue noted in the error report. Please be advised that failure to supply this information within the time allowed may constitute a violation of Chapter 106, Florida Statutes.

If you need assistance in filing an amendment, please contact the Division's help line at (850) 245-6280.

Sincerely,

Kristi Reid Bronson
Chief, Bureau of Election Records

Attachment

cc: William "Will" Rankin, Candidate

EXHIBIT

4 (of 2)

Error Report

Candidate: William "Will" Rankin

Office: CFO

Report: 2015 TR (34) Covering Period: 10/31/14 - 2/2/15

Account: 61112

Contributions**Expenditures**

<u>Seq</u>	<u>Date</u>	<u>Name</u>	<u>Address</u>	<u>City/State/Zip</u>	<u>Type</u>	<u>Expenditure Purpose</u>	<u>Amount</u>	<u>Amend</u>
1	11/03/14	SHELL	11302 N DALE MABRY HWY	TAMPA FL 3-3618	REF	CAMPAIGN TRAVEL	\$0.32	
*Refunds must be negative amounts								
6	10/31/14	NEEDELMAN JAY	520 WEST 47TH STREET	MIAMI BEACH FL 3-3140	MON	CAMPAIGN PROFESSIONAL FEES	\$0.00	
*Amount is Zero								
36	02/02/15	RANKIN WILLIAM	265 S FEDERAL HWY	DEERFIELD BEACH FL 3-3334	DIS	TO REPAY CAMPAIGN LOAN	\$0.00	
*Amount is Zero								

Fund Transfers**Other Distributions**

EXHIBIT

4 (2 of 2)

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

(1) William "Will" Rankin (2) 61112
Candidate, Committee or Party Name I.D. Number

(3) 265 South Federal Highway Deerfield Beach FL 33441
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
☐ Committee of Continuous Existence
☐ Party Executive Committee

☐ Check If PC has DISBANDED
☐ Check If CCE has DISBANDED

(5) REPORT IDENTIFIERS

Cover Period: From 10/31/2014 To 02/02/2015 Report Type: TR

☐ Original ☒ Amendment ☐ Special Election Report

(6) CONTRIBUTIONS THIS REPORT

Cash & Checks	\$100.00
Loans	\$1,000.00
<i>Total Monetary</i>	\$1,100.00
In-Kind	\$0.00

(7) EXPENDITURES THIS REPORT

Monetary Expenditures	\$3,936.64
Transfers to Office Account	\$0.00
<i>Total Monetary</i>	\$3,936.64

(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

CAMPAIGN TREASURER'S REPORT - ITEMIZED CONTRIBUTIONS

Name: William "Will" Rankin

Report: 2015 TR

Period: 10/31/2014 to 02/02/2015

** Records in Filed Report **

Seq #	Full Name (Last, Suffix, First, Middle)	Contributor	Occupation	Amount
Date	Street Address & City, State, Zip	Type	In Kind Description	Amend
1	WALKER, WILLIAM	I	RETIRED	\$100.00
10/31/2014	1012 WEATHERFORD WOOD CIR. DELRAY BEACH, FL 33444	CHE		
2	RANKIN, WILLIAM	I	CANDIDATE FOR CFO	\$1,000.00
10/31/2014	265 S. FEDERAL HWY. BOCA RATON, FL 33444	LOA		

CAMPAIGN TREASURER'S REPORT - ITEMIZED EXPENDITURES

Name: William "Will" Rankin

Report: 2015 TR

Period: 10/31/2014 to 02/02/2015

** Records in Filed Report **

Seq#	Full Name (Last, Suffix, First, Middle)	Type	Purpose	Amount
Date	Street Address & City, State, Zip			Amend
1	SHELL 11302 N DALE MABRY HWY. TAMPA, FL 33618	REF	CAMPAIGN TRAVEL	(\$0.32)
11/03/2014				UPD
* 1	SHELL 11302 N DALE MABRY HWY. TAMPA, FL 33618	REF	CAMPAIGN TRAVEL	\$0.32
11/03/2014				History 02/12/15
2	CHEVRON 17503 PINES BLVD PEMBROKE PINES, FL 33024	MON	CAMPAIGN TRAVEL	\$6.04
10/31/2014				
3	SUNTRUST PO BOX 305183 NASHVILLE, TN 37230	MON	CAMPAIGN BANK FEES	\$20.00
10/31/2014				
4	CHEVRON 17503 PINES BLVD PEMBROKE PINES, FL 33029	MON	CAMPAIGN TRAVEL	\$24.98
10/31/2014				
5	ROADHOUSE 4616 W KENNEDY BLVD TAMPA, FL 33609	MON	CAMPAIGN MEALS	\$26.26
10/31/2014				
6	NEEDELMAN JAY 520 WEST 47TH STREET MIAMI BEACH, FL 33140	MON	CAMPAIGN PROFESSIONAL FEES	\$100.00
10/31/2014				UPD
* 6	NEEDELMAN JAY 520 WEST 47TH STREET MIAMI BEACH, FL 33140	MON	CAMPAIGN PROFESSIONAL FEES	\$0.00
10/31/2014				History 02/12/15
7	COURTSIDE GRILLE 505 N. FRANKLIN ST. TAMPA, FL 33602	MON	CAMPAIGN MEALS	\$15.26
11/03/2014				
8	SUNOCO 1212 MISSION HILLS RD DAYTONA BEACH, FL 33654	MON	CAMPAIGN TRAVEL	\$25.00
11/03/2014				
9	TENDER TOUCH CLEANERS 211 N DALE MABRY HWY TAMPA, FL 33609	MON	CAMPAIGN CLEANING	\$31.47
11/03/2014				
10	SHELL 17503 PINES BLVD PEMBROKE PINES, FL 33029	MON	CAMPAIGN TRAVEL	\$31.97
11/03/2014				
11	RACEWAY 7721 PINES BLVD PEMBROKE PINES, FL 33024	MON	CAMPAIGN TRAVEL	\$41.67
11/03/2014				
12	GOLDEN CORRAL 443 MAIN ST SAFETY HARBOR, FL 34695	MON	CAMPAIGN MEALS	\$15.08
11/04/2014				
13	ROADHOUSE 4616 W KENNEDY BLVD TAMPA, FL 33618	MON	CAMPAIGN MEALS	\$35.90
11/04/2014				
14	WAL MART 2615 S DIXIE HWY W PALM BEACH, FL 33401	MON	CAMPAIGN SUPPLIES	\$51.47
11/04/2014				
15	TECO PO BOX 31017 TAMPA, FL 33631	MON	CAMPAIGN UTILITIES	\$79.48
11/05/2014				
16	BEST IN CLASS SEO 7721 PINES BLVD PEMBROKE PINES, FL 33024	MON	CAMPAIGN CONSULTING FEE	\$581.00
11/05/2014				
17	IHOP 11302 N DALE MABRY HWY TAMPA, FL 33618	MON	CAMPAIGN MEALS	\$31.04
11/07/2014				
18	WESTAR 770 WEST COURTNEY CAMPBELL HWY TAMPA, FL 33609	MON	CAMPAIGN TRAVEL	\$42.96
11/05/2014				
19	SUNTRUST PO BOX 305183 NASHVILLE, TN 37230	MON	CAMPAIGN MERCHANT FEES	\$15.91
11/10/2014				
20	SUNTRUST PO BOX 305183 NASHVILLE, TN 37230	MON	CAMPAIGN MERCHANT FEES	\$41.44
11/10/2014				

Name: William "Will" Rankin

Report: 2015 TR

Period: 10/31/2014 to 02/02/2015

** Records in Filed Report **

Seq #	Full Name (Last, Suffix, First, Middle)	Type	Purpose	Amount
Date	Street Address & City, State, Zip			Amend
21	SUNTRUST PO BOX 305183 NASHVILLE, TN 37230	MON	CAMPAIGN MERCHANT FEES	\$43.00
11/10/2014				
22	VERIZON 3101 STATE ROAD 580 SAFETY HARBOR, FL 34695	MON	CAMPAIGN PHONE	\$87.70
11/12/2014				
23	SUNTRUST PO BOX 305183 NASHVILLE, FL 37230	MON	CAMPAIGN BANK FEE	\$20.00
11/28/2014				
24	SUNTRUST PO BOX 305183 NASHVILLE, TN 37230	MON	CAMPAIGN MERCHANT FEES	\$3.25
12/10/2014				
25	SUNTRUST PO BOX 305183 NASHVILLE, FL 37230	MON	CAMPAIGN MERCHANT FEES	\$19.95
12/10/2014				
26	SUNTRUST PO BOX 305183 NASHVILLE, TN 37230	MON	CAMPAIGN MERCHANT FEES	\$41.90
11/10/2014				
27	SUNTRUST PO BOX 305183 NASHVILLE, TN 37230	MON	CAMPAIGN MERCHANT FEES	\$43.58
12/10/2014				
28	VERIZON 3101 STATE ROAD 580 SAFETY HARBOR, FL 34695	MON	CAMPAIGN PHONE	\$72.12
12/10/2014				UPD
28	VERIZON 3101 STATE ROAD 580 SAFETY HARBOR, FL 34695	MON	CAMPAIGN PHONE	\$218.01
12/10/2014				History 03/21/15
29	SUNTRUST PO BOX 305183 NASHVILLE, FL 37230	MON	CAMPAIGN BANK FEE	\$20.00
12/31/2014				
30	VERIZON 3101 ST RD 580 SAFETY HARBOR, FL 34695	MON	CAMPAIGN PHONE	\$15.00
01/12/2015				
31	SUNTRUST PO BOX 305183 NASHVILLE, TN 37230	MON	CAMPAIGN BANK FEES	\$19.95
01/12/2015				
32	SUNTRUST PO BOX 305183 NASHVILLE, TN 37230	MON	CAMPAIGN MERCHANT FEES	\$34.90
01/12/2015				
33	OATES ENERGY 11302 N DALE MABRY HWY TAMPA, FL 33619	MON	CAMPAIGN UTILITIES	\$45.60
01/20/2015				
34	SUNTRUST PO BOX 305183 NASHVILLE, DC 37230	MON	CAMPAIGN BANK FEE	\$20.00
01/30/2015				
35	NEEDELMAN JAY 520 WEST 47TH STREET MIAMI BEACH, FL 33140	MON	CAMPAIGN PROFESSIONAL FEES	\$100.00
02/02/2015				
36	RANKIN WILLIAM 265 S. FEDERAL HWY DEERFIELD BEACH, FL 33334	DIS	TO REPAY CAMPAIGN LOAN	\$2,133.08
02/02/2015				UPD
* 36	RANKIN WILLIAM 265 S. FEDERAL HWY DEERFIELD BEACH, FL 33334	DIS	TO REPAY CAMPAIGN LOAN	\$0.00
02/02/2015				History 02/12/15
* 37	SUNTRUST PO BOX 305183 NASHVILLE, TN 37230	REF	MERCHANT FEES REFUND	(\$209.45)
02/04/2015				ADD
* 38	SUNTRUST PO BOX 305183 NASHVILLE, TN 37230	REF	BANK MONTHLY FEE REFUND	(\$20.00)
02/06/2015				ADD
* 39	SUNTRUST PO BOX 305183 NASHVILLE, TN 37230	REF	BANK MONTHLY FEE REFUND	(\$20.00)
02/06/2015				ADD
40	SUNTRUST PO BOX 305183 NASHVILLE, TN 37230	REF	BANK MONTHLY FEE REFUND	(\$20.00)
02/02/2015				ADD

EXHIBIT 5

Reviewed 3/21/15 (405)

ID: 61112

CAMPAIGN TREASURER'S REPORT - ITEMIZED EXPENDITURES

Page 3 of 3

Name: William "Will" Rankin

Report: 2015 TR

Period: 10/31/2014 to 02/02/2015

** Records in Filed Report **

Seq #	Full Name (Last, Suffix, First, Middle)	Type	Purpose	Amount
Date	Street Address & City, State, Zip			Amend
41	SUNTRUST PO BOX 305183 NASHVILLE, TN 37230	REF	BANK MONTHLY FEE REFUND	(\$20.00)
02/02/2015				ADD
* 42	RANKIN WILLIAM 265 S. FEDERAL HWY DEERFIELD BEACH, FL 33465	RMB	REPAY CAMPAIGN LOAN FROM CANDIDATE	\$289.45
02/17/2015				ADD
* 43	SUNTRUST PO BOX 305183 NASHVILLE, TN 37230	MON	MERCHANT ACCOUNT FEES	\$34.90
02/10/2015				ADD
* 44	SUNTRUST PO BOX 305183 NASHVILLE, TN 37230	MON	MERCHANT ACCOUNT FEES	\$19.95
02/10/2015				ADD
* 45	SUNTRUST PO BOX 305183 NASHVILLE, TN 37230	REF	MERCHANT ACCOUNT FEES REFUND	(\$54.85)
02/13/2015				ADD

EXHIBIT

5 (5 of 5)

* Incomplete Record

Reviewed On: 3/21/15 6:48 pm

Prepared on: 4/9/15 2:50:31PM



FLORIDA DEPARTMENT OF STATE

Ken Detzner
Secretary of State

DIVISION OF ELECTIONS

FINAL NOTICE

Delivery Confirmation:

USPS TRACKING #
& CUSTOMER
RECEIPT

9114 9999 4423 8939 8827 33
For Tracking or inquiries go to USPS.com
or call 1-800-222-1811

February 19, 2015

Jay M. Needelman, Treasurer for
Candidate William "Will" Rankin
520 West 47th Street
Miami Beach, FL 33140-3028

Re: CAN 61112

Dear Mr. Needelman:

You have previously been advised that the campaign treasurer's report(s) listed below is incomplete for the reasons noted in the attached error report:

<u>Year</u>	<u>Type</u>	<u>Cover Period</u>
2015	TR	10/31/14 - 2/2/15

Pursuant to Section 106.07(2), Florida Statutes, you have 7 days from receipt of this letter to correct errors or provide missing information. If the information has been reported accurately, you must provide a written explanation to the Division addressing the issue noted in the error report. Please be advised that if you fail to comply with this request, the Division will forward this matter to the Florida Elections Commission for further action. Section 106.265(1), Florida Statutes, authorizes the Florida Elections Commission to impose civil penalties of up to \$1,000 per violation.

If you need assistance in filing an amendment, please contact the Division's help line at (850) 245-6280.

Sincerely,

Kristi Reid Bronson
Chief, Bureau of Election Records

Attachment

cc: William "Will" Rankin, Candidate

EXHIBIT

6 (1 of 2)

Compliance Report

Candidate: William "Will" Rankin

Office: CFO

Report: 2015 TR (34) Covering Period: 10/31/14 - 2/2/15

Account: 61112

Overall

<u>Statute</u>	<u>FAC</u>	<u>Description</u>
106.11(3)		Deficit balance

Contributions

Expenditures

Fund Transfers

Other Distributions

EXHIBIT

6 (2012)

Sum of Contributions vs Expenditures

2/19/2015 8:43:13 AM

William "Will" Rankin

61112

Date of last Contribution: 10/31/14

0 After

Year	Report	Contributions	Expenditures	Running Total
2013	M10	\$10,625.00	\$672.58	\$9,952.42
	M11	\$151.00	\$2,287.42	\$7,816.00
	M12	\$5,025.00	\$387.03	\$12,453.97
2014	M1	\$373.99	\$594.55	\$12,233.41
	M2	\$100.00	\$678.88	\$11,654.53
	M3	\$0.00	\$582.16	\$11,072.37
	M4	\$2,431.00	\$1,590.34	\$11,913.03
	M5	\$4,950.00	\$6,562.80	\$10,300.23
	P1	\$50.00	\$8,572.93	\$1,777.30
	P1A	\$125.00	\$178.33	\$1,723.97
	P2	\$510.00	\$34.00	\$2,199.97
	P2A	\$100.00	\$622.24	\$1,677.73
	P3	\$2,500.00	\$393.24	\$3,784.49
	P4	\$10.00	\$61.18	\$3,733.31
	P5	\$55.00	\$217.24	\$3,571.07
	P6	\$705.00	\$792.10	\$3,483.97
	P7	\$100.00	\$1,426.01	\$2,157.96
	P7A	\$0.00	\$155.11	\$2,002.85
	G1	\$0.00	\$2,017.74	(\$14.89)
	G1A	\$2,000.00	\$955.24	\$1,029.87
	G2	\$0.00	\$164.50	\$865.37
	G2A	\$660.00	\$283.85	\$1,241.52
	G3	\$500.00	\$269.09	\$1,472.43
	G4	\$1,110.00	\$930.19	\$1,652.24
	G5	\$150.00	\$306.58	\$1,495.66
	G6	\$2,050.00	\$335.04	\$3,210.62
	G7	\$100.00	\$98.16	\$3,212.46
	D1	\$870.00	\$93.70	\$3,988.76
	D2	\$0.00	\$0.00	\$3,988.76

EXHIBIT

7

(102)

Sum of Contributions vs Expenditures

2/19/2015 8:43:13 AM

William "Will" Rankin

61112

Date of last Contribution: 10/31/14

0 After

Year	Report	Contributions	Expenditures	Running Total
2014	D3	\$0.00	\$0.00	\$3,988.76
	D4	\$50.00	\$904.73	\$3,134.03
	D5	\$88.00	\$44.06	\$3,177.97
	D6	\$0.00	\$356.42	\$2,821.55
2015	TR	\$1,100.00	\$4,082.53	(\$160.98)
Campaign Total:		\$36,488.99	\$36,649.97	

EXHIBIT 7 (2 of 2)

Name: William "Will" Rankin

Report: 2014 M1

Period: 01/01/2014

to 01/31/2014

** Records in Filed Report **

Seq #	Full Name (Last, Suffix, First, Middle)	Contributor	Occupation	Amount
Date	Street Address & City, State, Zip	Type	In-Kind Description	Amend
1	HASTINGS, SHARON	I	RETIRED	\$50.00
01/21/2014	260 BELINA DR. NAPLES, FL 34104	CHE		
2	GARGAN, MARLENE	I	RETIRED	\$100.00
01/21/2014	149 FOREST HILLS BLVD. NAPLES, FL 34113	CHE		
3	FREDERICK, SALLY	I	RETIRED TEACHER	\$25.00
01/21/2014	377 FIELDSTONE BLVD. #1502 NAPLES, FL 34109	CHE		
4	RUZZO, IRENE	I	REALTOR	\$99.00
01/21/2014	1014 RICHARD DR. LINWOOD, NJ 08221	CHE		
5	SCHWARTZ, BARBARA	I	RETIRED	\$99.99
01/29/2014	7920 SW 138TH CT. MIAMI, FL 33183	CHE		
6	COVAR, DARREN	I	ATTORNEY	\$2,500.00
01/29/2014	401 MIRACLE MILE CORAL GABLES, FL 33134	INK	OFFICE SPACE	

BARBARA SCHWARTZ
7920 SW 138TH CT
MIAMI FL 33183-3035

680
83-27831 FL
23541

1/21/14 Date

Pay Rankin CF to the order of \$ 500.00

Fifteen and no/100 Dollars

Bank of America

ACH N/T 083100377

ADVISOR

EXHIBIT

8

Name: William "Will" Rankin

Report: 2014 P6

Period: 08/02/2014 to 08/08/2014

** Records in Filed Report **

Seq # Date	Full Name (Last, Suffix, First, Middle Street Address & City, State, Zip	Contributor Type	Occupation In-Kind Description	Amount Amend
1 08/08/2014	GARGAN, MARLENE 149 FOREST HILLS BLVD. NAPLES, FL 34113	I CHE	RETIRED RETIRED	\$50.00
2		X X		\$0.00 DEL
3		X X		\$0.00 DEL
4 08/04/2014	FREDERICK, SALLY 3714 FIELDSTONE BLVD. 1202 NAPLES, FL 34109	I CHE	RETIRED	\$25.00
5 08/08/2014	MORTON, PHILLIP 11704 SUNOWA SPRINGS TRAIL BRYCEVILLE, FL 32009	I CHE	RETIRED	\$100.00
6 08/08/2014	STEWART, SONIA 15827 SW 16TH STREET PEMBROKE PINES, FL 32007	I CHE	NURSE	\$100.00
7 08/08/2014	EVANS, KENNETH 4624 SEA GRAPE DR. FT. LAUDERDALE, FL 33308	I CHE	CAMP DIRECTOR	\$100.00
8 08/08/2014	RUZZO, IRENE 1014 RICHARD DR. LINWOOD, NJ 08221	I CHE	REALTOR	\$330.00

ICORP3 LLC
300A S BELCHER RD
CLEARWATER, FL 33765

DATE 8/6/14 63-391-631

PAY TO THE ORDER OF WILL RANKIN \$ 50.00

FIFTY ⁰⁰/₁₀₀ DOLLARS

FOR DONATION / FUND RAISER

FIFTH THIRD BANK

1018

81

PHYLLIS L. SCHULTE
RONALD J. SCHULTE
10939 AVANA WAY # 311
TRINITY, FL 34655

DATE 8/6/2014 4791 63-0261/2631

PAY TO THE ORDER OF Rankin for CFJ \$ 100.00

One hundred dollars DOLLARS

Suncost Schools
Federal Credit Union
NAPLES, FLORIDA 34113

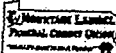
4791

JAMES S. FALVO
456 BUCHANAN STREET
WARREN, PA 16365
814-726-7438

524
80-85792313

August 6, 2014
Date

Pay to the Order of William Rankin Campaign \$ 40.00
Forty Dollars and 00/100 Dollars

 SUNTRUST BANK
1315 Pennsylvania Ave. E
Warren, PA 16365
Phone Number (814) 723-2221

[REDACTED]


STUART A. WILLIAMS
P.O. BOX 6676
OZONA, FL 34080

63-215/631
1000047001481

8174

8/4/14
Date

Pay to the Order of Will Rankin for CFO Campaign \$ 100.00
One hundred dollar and 00/100 Dollars

 SUNTRUST
ACH RT 081000104

Camelia Rosta

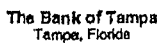
[REDACTED]

WELTER LAW FIRM, P.A.
OPERATING ACCOUNT
205 North Armenia Ave, Suite 101
Tampa, FL 33609

1036
89-868/831


DATE 8/6/14

PAY TO THE ORDER OF William Rankin Campaign \$ 50.00
Fifty and 00/100 DOLLARS

 The Bank of Tampa
Tampa, Florida

FOR CFO Campaign Event Chris Welter


[REDACTED]

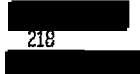
 **SUNTRUST**

CASH IN TICKET DEBIT

SunTrust Bank, Tampa Bay
Northwood

Cash Box Number
08

 **CASH IN \$ 40.00**

 **16:55:09 08/08/2014 ***
218 8 AM

[REDACTED]

EXHIBIT 9 (2 of 5)



Deposit Ticket

Date _____

Account Name (print) William Rautin Campaign

Signature (only if receiving cash from deposit) _____

Checks and other items are received for deposit subject to the provisions of the Uniform Commercial Code and any applicable collection agreement. Deposits may not be available for immediate withdrawal.

314408 (4/08) 16000 30523451

Account No. _____

☒ Cash
☐ Coin

100 -

C
H
E
C
K
S

Subtotal

☐ Less Cash Received

\$

100. -

⑆51000175⑆

110 CASH DEPOSIT
217
42026103 94650 8
Transaction Date: 08/08/2014 16:54:17



HARLAND CLARKE 104065 (06/05) 40278106

**CASH IN TICKET
DEBIT**

SunTrust Bank, Tampa Bay
Northwood

Cash Box Number

08

\$ _____

CASH IN \$ 100.00

217

42026103 94650 8

16:54:17 08/08/2014 *
AM

⑆555506567⑆

2610008⑆

EXHIBIT

9

(345)



Deposit Ticket

Date

Account Name (print)

William Rankin Campaign

Signature (only if receiving cash from deposit)

Checks and other items are received for deposit subject to the provisions of the Uniform Commercial Code and any applicable collection agreement. Deposits may not be available for immediate withdrawal.

3144408 (4/08) 30523451

Account No.

☒ Cash

☐ Coin

HECKS

Subtotal

☐ Less Cash Received

\$

100.00

⑆510001751⑆

110 CASH DEPOSIT
Bus. Date 08/08/2014 AM
100.00 CASH
100.00 TOTAL
42026103 94650 8
Transaction Date: 08/08/2014 16:53:53



CASH IN TICKET
DEBIT

SunTrust Bank, Tampa Bay
Northwood

Cash Box Number

08

⑆555506567⑆

⑆510008⑆

HARLAND CLARKE 12486 (08/08) 40273165

\$

CASH IN \$

100.00

16:53:53 08/08/2014 *

AM

215

42026103 94650

8

EXHIBIT

9 (4 & 5)



Deposit Ticket

Date _____

Account Name (print) _____

Signature (only if receiving cash from deposit) _____

UNRECORDED

Checks and other items are received for deposit subject to the provisions of the Uniform Commercial Code and any applicable collection agreement. Deposits may not be available for immediate withdrawal.
314408 (4/08) M999 3023451

Account No. _____

☒ Cash
☐ Coin

CHECKS
CASH
TOTAL

Subtotal

☐ Less Cash Received

\$

100 —

100. —

⑆510001751⑆

110 CASH DEPOSIT
214 Bus. Date 8/8/2014 AM
42026105 94650 8 100.00 CASH
Transaction Date: 8/8/2014 16:53:31
100.00 TOTAL



HARLAND CLARKE M2405 (08/08) 40273165

**CASH IN TICKET
DEBIT**

SunTrust Bank, Tampa Bay
Northwood

Cash Box Number

08

\$ 100.00
CASH IN \$ 100.00

214
42026105 94650 8

16:53:31 08/08/2014 *
AH

⑆555506567⑆

2610008⑆

EXHIBIT

9 (525)

Name: William "Will" Rankin

Report: 2014 P7

Period: 08/09/2014 to 08/21/2014

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

Seq #	Full Name (Last, Suffix, First, Middle)	Contributor	Occupation	Amount
Date	Street Address & City, State, Zip	Type	In-Kind Description	Amend
1	MOBLEY, RODERICK	I	BUSINESS OWNER	\$100.00
08/15/2014	8362 PINES BLVD. PEMBROKE PINES, FL 33024	CHE		

[illegible][illegible]

SUNTRUST

SunTrust Bank, Miami, N.A.

\$

Miami Beach Office
Cash Box Number

CASH IN \$

100.00

14

16:37:46 08/15/2014 *

14

1:5555070291:

360001411

EXHIBIT

10

Name: William "Will" Rankin

Report: 2014 M3

Period: 03/01/2014

to 03/31/2014

** Records in Filed Report **

Seq #	Full Name (Last, Suffix, First, Middle Street Address & City, State, Zip)	Type	Purpose	Amount
Date				Amend
1	CHEVRON 1790 HILLSBORO BLVD. DEERFIELD BEACH, FL 33442	MON	CAMPAIGN TRAVEL & FUEL	\$10.00
03/03/2014				
2	ENTERPRISE RENT A CAR 2400 N. POWERLINE ROAD POMPANO BEACH, GA 33069	MON	CAMPAIGN TRAVEL	\$39.15
03/06/2014				
3	SUNTRUST BANK 6702 FOREST HILL BLVD. GREENACRES, FL 33413	PCW	CAMPAIGN EVENTS EXPENSES FOR 3/16/14	\$100.00
03/16/2014				UPD
* 3	SUNTRUST BANK 6702 FOREST HILL BLVD GREENACRES, FL 33413	PCW	CAMPAIGN EVENTS EXPENSES FOR 3/16/14	\$0.00
03/16/2014				History 05/25/14
4	BAHIA MAR BEACH RESORT 801 SEABREEZE BLVD FT. LAUDERDALE, FL 33316	PCS	CAMPAIGN EVENT DOOR CHARGES	\$35.00
03/16/2014				
5	CHEVRON 9141 SOUTHERN BLVD. ROYAL PALM BEACH, FL 33411	PCS	CAMPAIGN TRAVEL AND FUEL	\$45.00
03/16/2014				
6	VONAGE 23 MAIN ST HOLMDEL, NJ 07733	MON	CAMPAIGN COMMUNICATION	\$18.16
03/16/2014				
7	USPS 212 E. HILLSBORO BLVD. DEERFIELD BEACH, FL 33441	MON	CAMPAIGN POSTAGE (DOCS TO TALLAHASSEE)	\$8.90
03/21/2014				
8	MARATHON OIL 26520 JONES LOOP RD. PUNTA GORDA, FL 33950	MON	CAMPAIGN TRAVEL & FUEL	\$59.91
03/22/2014				
9	LUNA RESTAURANT 950 LAKE CARILLON DR ST. PETERSBURG, FL 33716	MON	MEAL WITH GREG PETZOLD (CAMPAIGN MANAGER)	\$16.91
03/23/2014				
10	SPRINGHILL SUITES 3485 ULMERTON RD CLEARWATER, FL 33762	MON	CAMPAIGN LODGING TO MEET WITH GREG PETZOLD (CAMPAIGN MANAGER)	\$129.92
03/23/2014				
11	SHELL 6615 DUDLEY DR. NAPLES, FL 34105	MON	CAMPAIGN FUEL & TRAVEL	\$56.78
03/25/2014				
12	RUBY TUESDAYS 8777 TAMiami TRAIL NAPLES, FL 34108	MON	MEAL WITH RAY HEADEN (CAMPAIGN CONSULTANT)	\$19.58
03/25/2014				
13	PF CHENG'S 219 WESTSHORE PLAZA TAMPA, FL 33609	MON	CAMPAIGN MEALS	\$42.01
03/24/2014				
14	CANYON SOUTHWEST CAFE 1818 E. SUNRISE BLVD FT. LAUDERDALE, FL 33304	MON	CAMPAIGN MEALS	\$80.84
03/25/2014				

WILLIAM RANKIN CAMPAIGN FOR CFO
265 S FEDERAL HWY SUITE 258
DEERFIELD BEACH, FLORIDA 33441

1004

63-215-631

Pay to the order of - Broward Democratic Party
Six hundred fifty and -

3/15/14
\$ 650.⁰⁰
100 dollars

SUNTRUST

ACH REF ID: 0000104

for Dinner - Party Unity.

Signature: [Handwritten Signature]

EXHIBIT

Name: William "Will" Rankin

Report 2014 P7

Period: 08/09/2014 to 08/21/2014

** Records in Filed Report **

Seq # Date	Full Name (Last, Suffix, First, Middle Street Address & City, State, Zip	Type	Purpose	Amount Amend
1 08/11/2014	PALM BEACH DEMOCRATIC PARTY 8401 LAKE WORTH RD. LAKE WORTH, FL 33467	MON	CAMPAIGN EVENT FEE	\$200.00
2 08/11/2014	LUNA RESTAURANT 6801 COLLINS AVE MIAMI BEACH, FL 33141	MON	CAMPAIGN MEALS	\$67.78
3 08/11/2014	NEEDELMAN JAY M. 520 W. 47TH ST. MIAMI BEACH, FL 33140	MON	CAMPAIGN PROFESSIONAL FEES	\$50.00
4 08/11/2014	SUNTRUST PO BOX 305183 NASHVILLE, TN 37230	MON	CAMPAIGN BANK FEES	\$39.18
5 08/11/2014	SUNTRUST PO BOX 305183 NASHVILLE, FL 37230	MON	CAMPAIGN BANK FEES	\$9.27
6 08/11/2014	SUNTRUST PO BOX 305183 NASHVILLE, TN 37230	MON	CAMPAIGN BANK FEES	\$3.94
7 08/12/2014	LERNER BETH 100 S. MILITARY TRAIL, #15 DEERFIELD BEACH, FL 33442	MON	CAMPAIGN EVENT FEE	\$100.00 UPD
7 08/12/2014	LERNER BETH 100 S. MILITARY TRAIL, #15 DEERFIELD BEACH, FL 33442	MON	CAMPAIGN CONSULTING FEE	\$100.00 History 09/12/14
8 08/12/2014	HESS 6974 E. COLONIAL DR ORLANDO, FL 32807	MON	CAMPAIGN TRAVEL	\$8.12
9 08/13/2014	ENTERPRISE RENTACAR 17503 PINES BLVD PEMBROKE PINES, FL 33029	MON	CAMPAIGN TRAVEL	\$206.79
10 08/15/2014	LA CARRETA 301 N UNIVERSITY DR PEMBROKE PINES, FL 33024	MON	CAMPAIGN MEALS	\$144.30
11 08/16/2014	POSTCARDMANIA 2145 SUNNYDALE BLVD CLEARWATER, FL 33765	MON	CAMPAIGN PRINTING	\$469.88
12 08/19/2014	RACEWAY 2575 W INT'L SPEEDWAY DAYTONA BEACH, FL 32114	MON	CAMPAIGN TRAVEL	\$48.65
13 08/19/2014	CIRCLE K 200 CHENEY HWY TITUSVILLE, FL 32780	MON	CAMPAIGN TRAVEL	\$45.25
14 08/20/2014	STARBUCKS 7153 PHILLIPS HWY. JACKSONVILLE, FL 32099	MON	CAMPAIGN MEALS	\$10.01
15 08/21/2014	CIRCLE K 200 CHENEY HWY TITUSVILLE, FL 32780	REF	CAMPAIGN TRAVEL	(\$0.45) UPD
* 15 08/21/2014	CIRCLE K 200 CHENEY HWY. TITUSVILLE, FL 32780	REF	CAMPAIGN TRAVEL	\$0.45 History 09/12/14
16 08/21/2014	PICCADILLY 1700 W. INT'L SPEEDWAY DAYTONA BEACH, FL 32114	MON	CAMPAIGN MEALS	\$23.29

EXHIBIT

12 (1 of 2)

PO BOX 305183
NASHVILLE TN 37230-5183

36/E00/0175/0/ 40

08/31/2014

SUNTRUST

ACCOUNT
STATEMENT

DATE	AMOUNT	SERIAL #	DESCRIPTION
08/11	3.94		ELECTRONIC/ACH DEBIT SUNTRUST MERCHANT INTERCHNG 825309592889
08/11	9.27		ELECTRONIC/ACH DEBIT SUNTRUST MERCHANT DISCOUNT 825309592889
08/11	39.18		ELECTRONIC/ACH DEBIT SUNTRUST MERCHANT FEE 825309592889
08/11	50.00		CHECK CARD PURCHASE TR DATE 08/08 JAY M NEEDELMAN CPA 305-6735040 FL
08/11	67.78		CHECK CARD PURCHASE TR DATE 08/06 LUNA REST CARILLON PAR SAINT PETERSBFL
08/11	200.00		CHECK CARD PURCHASE TR DATE 08/07 PAYPAL *PALMBEACHCO 4029357733 CA
08/12	21.61		CHECK CARD PURCHASE TR DATE 08/09 HESS 09567 ORLANDO FL
08/12	100.00		CHECK CARD PURCHASE TR DATE 08/10 SQ *BETH LERNER DEERFIELD BEAFL
08/13	25.99		CHECK CARD PURCHASE TR DATE 08/11 MARATHON PETRO182006 DEERFIELD BEAFL
08/15	144.30		CHECK CARD PURCHASE TR DATE 08/13 LA CARRETA AT PEMERROKE PEMERROKE PINEFL
08/18	469.83		CHECK CARD PURCHASE TR DATE 08/14 POSTCARDMANIA-SALES 727-4414704 FL
08/19	45.25		CHECK CARD PURCHASE TR DATE 08/16 CIRCLE K 04658 TITUSVILLE FL
08/19	48.65		POINT OF SALE DEBIT TR DATE 08/19 RACEWAY 814 DAYTONA BCH FL 02729802
08/20	10.01		CHECK CARD PURCHASE TR DATE 08/18 STARBUCKS #08467 JACKS JACKSONVILLE FL
08/21	23.29		CHECK CARD PURCHASE TR DATE 08/19 PICCADILLY DAYTONA BEACHFL
08/22	30.45		CHECK CARD PURCHASE TR DATE 08/20 VONAGE *PRICE+TAXES 866-243-4357 NJ
08/22	124.66		CHECK CARD PURCHASE TR DATE 08/20 ENTERPRISE RENT-A-CAR PEMERROKE PINEFL
08/25	11.17		CHECK CARD PURCHASE TR DATE 08/21 ENTERPRISE CAR TOLLS 877-8601258 NY
08/25	40.00		CHECK CARD PURCHASE TR DATE 08/21 PINEILLAS COUNTY DEMOCR 07273272796 FL
08/25	150.00		CHECK CARD PURCHASE TR DATE 08/21 PBC DEMS 5614331112 FL
08/25	381.06		CHECK CARD PURCHASE TR DATE 08/20 HYATT REGENCY JACKSONV JACKSONVILLE FL
08/26	50.10		CHECK CARD PURCHASE TR DATE 08/23 SPIRIT A 48701030343310 MIRAMAR FL
08/29	15.46		CHECK CARD PURCHASE TR DATE 08/26 SHELL OIL 575433049QPS TAMPA FL
08/29	20.00		MAINTENANCE FEE

WITHDRAWALS/DEBITS: 29

DATE	BALANCE	COLLECTED DATE	BALANCE	COLLECTED DATE	BALANCE
08/01	3,593.27	08/11	3,136.00		3,136.00
08/04	3,275.22	08/12	3,014.39		3,014.39
08/05	3,229.77	08/13	3,195.19		3,195.19
08/06	2,873.31	08/15	3,150.89		3,150.89
08/07	2,826.17	08/18	2,681.06		2,681.06
08/08	3,506.17	08/19	2,587.16		2,587.16

MEMBER FDIC

CONTINUED ON NEXT PAGE

EXHIBIT

12 (2 of 2)

Name: William "Will" Rankin

Report: 2014 M2

Period: 02/01/2014 to 02/28/2014

** Records in Filed Report **

Seq # Date	Full Name (Last, Suffix, First, Middle Street Address & City, State, Zip)	Type	Purpose	Amount Amend
1 02/01/2014	LA HACIENDA 10400 COUNTY ROAD 48 HOWEY IN THE HILLS, FL 34737	MON	CAMPAIGN MEALS	\$17.98
2 02/01/2014	LA HACIENDA 10400 COUNTY ROAD 48 HOWEY IN THE HILLS, FL 34737	MON	CAMPAIGN MEALS	\$20.12
3 02/03/2014	AQUA BAR & GRILL 7627 WEST COURTNEY CAMPBELL CSWY. TAMPA, FL 33607	MON	CAMPAIGN MEALS	\$29.61
4 02/03/2014	AQUA BAR & GRILL 7627 WEST COURTNEY CAMPBELL CSWY. TAMPA, FL 33607	MON	CAMPAIGN MEALS	\$62.43
5 02/04/2014	DVCF 860 SUN DISC PLACE BOYNTON BEACH, FL 33436	MON	CAMPAIGN EVENT DUES	\$20.00
6 02/05/2014	BUCA DE PEPPLO 1500 APALACHEE PKWY TALLAHASSEE, FL 32301	MON	CAMPAIGN MEALS	\$58.40
7 02/05/2014	MISSION INN 10400 COUNTY ROAD 48 HOWEY IN THE HILLS, FL 34737	MON	CAMPAIGN LODGING AND TRAVEL	\$224.01
8 02/07/2014	ONE O ONE 215 WEST COLLEGE AVENUE TALLAHASSEE, FL 32301	MON	CAMPAIGN MEALS	\$29.73
9 02/07/2014	CHEVRON 380 WEST THARPE STREET TALLAHASSEE, FL 32301	MON	CAMPAIGN FUEL AND TRAVEL	\$60.00
10 02/18/2014	VONAGE 3813 MONROE STREET TALLAHASSEE, FL 32303	MON	CAMPAIGN PHONE	\$17.69
11 02/18/2014	GRAMPA'S BAKERY 17 WEST 1ST STREET DANIA BEACH, FL 33004	MON	CAMPAIGN MEALS	\$22.25
12 02/21/2014	LAS VEGAS II 7015 WEST BROWARD BLVD PLANTATION, FL 33317	MON	CAMPAIGN MEALS	\$30.41
13 02/21/2014	NEEDELMAN JAY 520 WEST 47TH STREET MIAMI BEACH, FL 33140	MON	CAMPAIGN ACCOUNTING FEES	\$50.00
14 02/24/2014	SAZON CUBAN RESTAURANT 7305 COLLINS AVENUE MIAMI BEACH, FL 33141	MON	CAMPAIGN MEALS	\$36.25

EXHIBIT

13

Name: William "Will" Rankin

Report: 2014 D1

Period: 10/18/2014

to 10/24/2014

** Records in Filed Report **

Seq # Date	Full Name (Last, Suffix, First, Middle Street Address & City, State, Zip	Contributor	Occupation	Amount
		Type	In-Kind Description	
1 10/24/2014	FORD, JULIE 1008 E. PEBBLE BEACH CIR. WINTER SPRINGS, FL	I CHE	RETIRED	\$60.00 UPD
* 1 10/24/2014	FORD, JULIE 1008 E. PEBBLE BEACH CIR. WINTER SPRINGS, FL	I CAS	RETIRED	\$60.00 History 11/03/14
2 10/23/2014	COMFORT CARE SUPPLIES, INC. 6741 WEST SUNRISE BLVD #10 PLANTATION, FL 33313	B CHE	RETIRED	\$500.00
3 10/21/2014	NAGGS, BARON 1012 WEATHERFORD WOOD CIR WINTER SPRINGS, FL 32708	I CHE	RETIRED	\$10.00
4 10/21/2014	HARRIS, HAROLD 2409 N RIDGEWOOD AVE. TAMPA, FL 33602	I CHE	RETIRED	\$150.00
5 10/21/2014	CAPITAL CITY DEMOCARTIC WOMEN'S CLUB PO BOX 38533 TALLAHASSEE, FL 32315	F CHE	POLITICAL	\$150.00

EXHIBIT

14

SUNTRUST BANK
PO BOX 305183
NASHVILLE TN 37230-5183

SUNTRUST

PAGE 1 OF 3
36/E00/0175/0/ 40
[REDACTED]
08/31/2014

ACCOUNT
STATEMENT

WILLIAM RANKIN CAMPAIGN FOR CFO
PO BOX 402084
MIAMI BEACH FL 33440

QUESTIONS? PLEASE CALL
1-800-786-8787

HOW CAN WE HELP YOU MAKE THE RIGHT FINANCIAL CHOICES FOR TODAY AND TOMORROW?
WITH OUR VARIETY OF SOLUTIONS AND FINANCIAL GUIDANCE.
WE VALUE YOU AS A CLIENT AND WANT TO HELP YOU BANK THE WAY THAT FITS YOUR LIFE.
LEARN MORE AT SUNTRUST.COM.

ACCOUNT SUMMARY
ACCOUNT TYPE ACCOUNT NUMBER STATEMENT PERIOD
TOTAL BUSINESS BANKING [REDACTED] 08/01/2014 - 08/31/2014

DESCRIPTION	AMOUNT	DESCRIPTION	AMOUNT
BEGINNING BALANCE	\$3,593.27	AVERAGE BALANCE	\$2,416.30
DEPOSITS/CREDITS	\$1,012.24	AVERAGE COLLECTED BALANCE	\$2,393.07
CHECKS	\$1,500.00	NUMBER OF DAYS IN STATEMENT PERIOD	31
WITHDRAWALS/DEBITS	\$2,874.10		
ENDING BALANCE	\$231.41		

DEPOSITS/CREDITS

DATE	AMOUNT	SERIAL #	DESCRIPTION	DATE	AMOUNT	SERIAL #	DESCRIPTION
08/08	50.00		DEPOSIT	08/08	100.00		DEPOSIT
08/08	100.00		DEPOSIT	08/08	330.00		DEPOSIT
08/08	100.00		DEPOSIT	08/15	100.00		DEPOSIT
08/04	25.00		ELECTRONIC/ACH CREDIT				
			SUNTRUST MERCHANT 0825309592	825309592889			
08/13	206.79		CHECK CARD CREDIT	TR DATE 08/11			
			ENTERPRISE RENT-A-CAR	PEMBROKE PINEFL			
08/21	.45		CHECK CARD CREDIT	TR DATE 08/19			
			RBT CIRCLE K 04658	EASYSAVINGS NY			

DEPOSITS/CREDITS: 9 TOTAL ITEMS DEPOSITED: 5

CHECKS

CHECK NUMBER	AMOUNT	DATE	PAID	CHECK NUMBER	AMOUNT	DATE	PAID
1012	500.00	08/25		1014	500.00	08/25	
1013	500.00	08/25					

CHECKS: 3

WITHDRAWALS/DEBITS

DATE	AMOUNT	SERIAL #	DESCRIPTION	DATE	AMOUNT	SERIAL #	DESCRIPTION
08/04	156.81		CHECK CARD PURCHASE	TR DATE 08/01			
			GRAND LUX CAFE #5009	AVENTURA FL			
08/04	186.24		CHECK CARD PURCHASE	TR DATE 07/31			
			VERIZON WRLS 13956-01	PEMBROKE PINEFL			
08/05	45.45		POINT OF SALE DEBIT	TR DATE 08/05			
			AMOCO FOOD MART	NAPLES FL 83387501			
08/06	356.46		CHECK CARD PURCHASE	TR DATE 08/04			
			ENTERPRISE RENT-A-CAR	PEMBROKE PINEFL			
08/07	47.14		POINT OF SALE DEBIT	TR DATE 08/06			
			7-ELEVEN	TAMPA FL 00MVK601			
			MEMBER FDIC				

CONTINUED ON NEXT PAGE

EXHIBIT 15 (1 of 5)

PO BOX 305183
NASHVILLE TN 37230-5183

36/E00/0175/0/ 40

08/31/2014

SUNTRUST

ACCOUNT
STATEMENT

DATE	AMOUNT	SERIAL #	WITHDRAWALS/DEBITS DESCRIPTION	
08/11	3.94		ELECTRONIC/ACH DEBIT SUNTRUST MERCHANT INTERCHNG	825309592889
08/11	9.27		ELECTRONIC/ACH DEBIT SUNTRUST MERCHANT DISCOUNT	825309592889
08/11	39.18		ELECTRONIC/ACH DEBIT SUNTRUST MERCHANT FEE	825309592889
08/11	50.00		CHECK CARD PURCHASE JAY M NEEDLEMAN CPA	305-6735040 FL TR DATE 08/08
08/11	67.78		CHECK CARD PURCHASE LUNA REST CARIILLON PAR	SAINT PETERSBFL TR DATE 08/06
08/11	200.00		CHECK CARD PURCHASE PAYPAL *PALMBEACHCO	4029357733 CA TR DATE 08/07
08/12	21.61		CHECK CARD PURCHASE HESS 09567	ORLANDO FL TR DATE 08/09
08/12	100.00		CHECK CARD PURCHASE SQ *BETH LERNER	DEERFIELD BEAFL TR DATE 08/10
08/13	25.99		CHECK CARD PURCHASE MARATHON PETRO182006	DEERFIELD BEAFL TR DATE 08/11
08/15	144.30		CHECK CARD PURCHASE LA CARRETA AT PEMBROKE	PEMBROKE PINEFL TR DATE 08/13
08/18	469.83		CHECK CARD PURCHASE POSTCARDMANIA-SALES	727-4414704 FL TR DATE 08/14
08/19	45.25		CHECK CARD PURCHASE CIRCLE K 04658	TITUSVILLE FL TR DATE 08/16
08/19	48.65		POINT OF SALE DEBIT RACEWAY 814	DAYTONA BCH FL 02729802 TR DATE 08/19
08/20	10.01		CHECK CARD PURCHASE STARBUCKS #08467 JACKS	JACKSONVILLE FL TR DATE 08/18
08/21	23.29		CHECK CARD PURCHASE PICCADILLY	DAYTONA BEACHFL TR DATE 08/19
08/22	30.45		CHECK CARD PURCHASE VONAGE *PRICE+TAXES	866-243-4357 NJ TR DATE 08/20
08/22	124.66		CHECK CARD PURCHASE ENTERPRISE RENT-A-CAR	PEMBROKE PINEFL TR DATE 08/20
08/25	11.17		CHECK CARD PURCHASE ENTERPRISE CAR TOLLS	877-8601258 NY TR DATE 08/21
08/25	40.00		CHECK CARD PURCHASE PINELLAS COUNTY DEMOCR	07273272796 FL TR DATE 08/21
08/25	150.00		CHECK CARD PURCHASE PBC DEMS	5614331112 FL TR DATE 08/21
08/25	381.06		CHECK CARD PURCHASE HYATT REGENCY JACKSONV	JACKSONVILLE FL TR DATE 08/20
08/26	50.10		CHECK CARD PURCHASE SPIRIT A 48701030343310	MIRAMAR FL TR DATE 08/23
08/29	15.46		CHECK CARD PURCHASE SHELL OIL 575433049QPS	TAMPA FL TR DATE 08/26
08/29	20.00		MAINTENANCE FEE	

WITHDRAWALS/DEBITS: 29

DATE	BALANCE	BALANCE ACTIVITY HISTORY COLLECTED DATE BALANCE	BALANCE	COLLECTED BALANCE
08/01	3,593.27	3,593.27 08/11	3,136.00	3,136.00
08/04	3,275.22	3,275.22 08/12	3,014.39	3,014.39
08/05	3,229.77	3,229.77 08/13	3,195.19	3,195.19
08/06	2,873.31	2,873.31 08/15	3,150.89	3,150.89
08/07	2,826.17	2,826.17 08/18	2,681.06	2,681.06
08/08	3,506.17	3,266.17 08/19	2,587.16	2,587.16

MEMBER FDIC

CONTINUED ON NEXT PAGE

EXHIBIT 15 (205)

PO BOX 305183
NASHVILLE TN 37230-5183

36/E00/0175/O/ 40

08/31/2014

SUNTRUST

ACCOUNT
STATEMENT

BALANCE ACTIVITY HISTORY					
DATE	BALANCE	COLLECTED BALANCE	DATE	BALANCE	COLLECTED BALANCE
08/20	2,577.15	2,577.15	08/25	316.97	316.97
08/21	2,554.31	2,554.31	08/26	266.87	266.87
08/22	2,399.20	2,399.20	08/29	231.41	231.41

MEMBER FDIC

EXHIBIT 15 (3005)

SUNTRUST BANK
PO BOX 305183
NASHVILLE TN 37230-5183

SUNTRUST

PAGE 1 OF 3
36/E00/0175/0/ 40
[REDACTED]
09/30/2014

ACCOUNT
STATEMENT

WILLIAM RANKIN CAMPAIGN FOR CFO
PO BOX 402084
MIAMI BEACH FL 33440

QUESTIONS? PLEASE CALL
1-800-786-8787

HOW CAN WE HELP YOU MAKE THE RIGHT FINANCIAL CHOICES FOR TODAY AND TOMORROW?
WITH OUR VARIETY OF SOLUTIONS AND FINANCIAL GUIDANCE.
WE VALUE YOU AS A CLIENT AND WANT TO HELP YOU BANK THE WAY THAT FITS YOUR LIFE.
LEARN MORE AT SUNTRUST.COM.

ACCOUNT TYPE ACCOUNT NUMBER STATEMENT PERIOD
TOTAL BUSINESS BANKING [REDACTED] 09/01/2014 - 09/30/2014

DESCRIPTION	AMOUNT	DESCRIPTION	AMOUNT
BEGINNING BALANCE	\$231.41	AVERAGE BALANCE	\$1,087.68
DEPOSITS/CREDITS	\$3,501.00	AVERAGE COLLECTED BALANCE	\$1,046.35
CHECKS	\$169.78	NUMBER OF DAYS IN STATEMENT PERIOD	30
WITHDRAWALS/DEBITS	\$2,279.86		
ENDING BALANCE	\$1,282.77		

DEPOSITS/CREDITS

DATE	AMOUNT	SERIAL #	DATE	AMOUNT	SERIAL #
09/15	35.00		09/19	60.00	
09/15	65.00		09/24	500.00	
09/18	500.00				
09/02	266.00				
09/05	2,000.00				
09/22	30.00				
09/29	20.00				
09/30	25.00				

REVERSAL OF OVERDRAFT ITEM FEE
MISCELLANEOUS CREDIT
ELECTRONIC/ACH CREDIT
SUNTRUST MERCHANT 0825309592 825309592889
ELECTRONIC/ACH CREDIT
SUNTRUST MERCHANT 0825309592 825309592889
ELECTRONIC/ACH CREDIT
SUNTRUST MERCHANT 0825309592 825309592889

DEPOSITS/CREDITS: 10

TOTAL ITEMS DEPOSITED: 8

CHECKS

CHECK NUMBER	AMOUNT	DATE	CHECK NUMBER	AMOUNT	DATE
1015	19.72	09/17	1016	150.06	09/22

CHECKS: 2

WITHDRAWALS/DEBITS

DATE	AMOUNT	SERIAL #	DESCRIPTION
09/02	380.00		OVERDRAFT ITEM FEE
09/02	2.00		CHECK CARD PURCHASE
09/02	6.70		COH METER PKG OFF BEAC
09/02	23.30		CHECK CARD PURCHASE
09/02	26.90		ENTERPRISE CAR TOLLS
			CHECK CARD PURCHASE
			OFFICE DEPOT #136
			CHECK CARD PURCHASE
			BRIO PEMBROKE PINES
			MEMBER FDIC

TR DATE 08/30
FL
TR DATE 08/30
877-8601258 NY
TR DATE 08/30
PEMBROKE PINEFL
TR DATE 08/30
PEMBROKE PINEFL
CONTINUED ON NEXT PAGE

EXHIBIT 15 (425)

PO BOX 305183
NASHVILLE TN 37230-5183

36/E00/0175/0/ 40
[REDACTED]
09/30/2014

SUNTRUST

ACCOUNT
STATEMENT

WITHDRAWALS/DEBITS

DATE	AMOUNT	SERIAL #	DESCRIPTION	TR DATE
09/02	51.03		CHECK CARD PURCHASE LAKE AVE BP QPS WEST PALM BEAFL	08/29
09/02	57.66		CHECK CARD PURCHASE JOY NOODLES & RICE WEST PALM BEAFL	08/29
09/02	82.30		CHECK CARD PURCHASE ENTERPRISE RENT-A-CAR TAMPA FL	08/27
09/02	87.10		CHECK CARD PURCHASE SPIRIT A 48701031562660 MIRAMAR FL	08/27
09/02	340.37		CHECK CARD PURCHASE DEES T SHIRTS INC RIVIERA BEACHFL	08/28
09/02	163.88		RECURRING CHECK CARD PURCHASE FACEBOOK AXLVK6J7X2 WWW.FB.ME/ADSCA	08/31
09/08	126.43		CHECK CARD PURCHASE OFFICE DEPOT #136 PEMBROKE PINEFL	09/04
09/10	.03		ELECTRONIC/ACH DEBIT SUNTRUST MERCHANT INTERCHNG 825309592889	
09/10	.45		ELECTRONIC/ACH DEBIT SUNTRUST MERCHANT DISCOUNT 825309592889	
09/10	37.59		ELECTRONIC/ACH DEBIT SUNTRUST MERCHANT FEE 825309592889	
09/15	23.44		CHECK CARD PURCHASE PANERA BREAD #3310 ALTAMONTE SPRFL	09/11
09/15	59.13		CHECK CARD PURCHASE 7-ELEVEN 35733 ORLANDO FL	09/11
09/16	28.00		CHECK CARD PURCHASE USPS PO BOXES 66101510 WASHINGTON DC	09/14
09/16	50.00		CHECK CARD PURCHASE JAY M NEEDELMAN CPA 305-6735040 FL	09/14
09/16	50.00		CHECK CARD PURCHASE JAY M NEEDELMAN CPA 305-6735040 FL	09/14
09/18	30.45		RECURRING CHECK CARD PURCHASE VONAGE *PRICE+TAXES 866-243-4357 NJ	09/16
09/19	18.11		CHECK CARD PURCHASE RACE TRAC 668 00006684 LAKE WALES FL	09/16
09/22	10.71		CHECK CARD PURCHASE CHEVRON 0202652 DEERFIELD BEAFL	09/17
09/22	55.49		CHECK CARD PURCHASE DNEH*DOMAIN HOSTING SRV 480-6242500 AZ	09/17
09/23	34.89		CHECK CARD PURCHASE CRACKER BARREL #118 PA PALM COAST FL	09/21
09/25	11.42		CHECK CARD PURCHASE DUNKIN #342892 Q35 ST PETERSBURGFL	09/23
09/25	36.52		CHECK CARD PURCHASE WESTSHORE PIZZA III TAMPA FL	09/22
09/29	428.00		CHECK CARD PURCHASE IN *ROADRUNNER ADVERTI 727-7776045 FL	09/26
09/30	37.96		CHECK CARD PURCHASE HESS 09319 PEMBROKE PINEFL	09/27
09/30	20.00		MAINTENANCE FEE	

WITHDRAWALS/DEBITS: 30

BALANCE ACTIVITY HISTORY

DATE	BALANCE	COLLECTED DATE	BALANCE	COLLECTED DATE
09/01	231.41	231.41 09/10	1,111.67	1,111.67
09/02	-723.83	-723.83 09/15	1,129.10	1,039.10
09/05	1,276.17	1,276.17 09/16	1,001.10	1,001.10
09/08	1,149.74	1,149.74 09/17	981.38	981.38

MEMBER FDIC

CONTINUED ON NEXT PAGE

EXHIBIT 15 (525)

SUNTRUST BANK
PO BOX 305183
NASHVILLE TN 37230-5183

PAGE 1 OF 1
66/E00/0175/0/ 40

03/31/2015

SUNTRUST

ACCOUNT
STATEMENT

WILLIAM RANKIN CAMPAIGN FOR CFO
PO BOX 402084
MIAMI BEACH FL 33440

QUESTIONS? PLEASE CALL
1-800-786-8787

HOW CAN WE HELP YOU MAKE THE RIGHT FINANCIAL CHOICES FOR TODAY AND TOMORROW?
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LEARN MORE AT SUNTRUST.COM.

ACCOUNT SUMMARY
ACCOUNT TYPE ACCOUNT NUMBER STATEMENT PERIOD
TOTAL BUSINESS BANKING 03/01/2015 - 03/31/2015
CLOSED

DESCRIPTION AMOUNT DESCRIPTION AMOUNT
BEGINNING BALANCE \$.00 AVERAGE BALANCE \$.00
DEPOSITS/CREDITS \$.00 AVERAGE COLLECTED BALANCE \$.00
CHECKS \$.00 NUMBER OF DAYS IN STATEMENT PERIOD 31
WITHDRAWALS/DEBITS \$.00
ENDING BALANCE \$.00

BALANCE ACTIVITY HISTORY
DATE BALANCE COLLECTED DATE BALANCE COLLECTED
03/01 .00 .00 03/31 .00 .00

MEMBER FDIC

EXHIBIT 16

15-271



William "Will" Rankin Campaign

Cpa160

to:

fec

03/21/2015 06:44 PM

Show Details

Dear Ms. Malphurs:

I am in receipt of your communication dated March 16, 2015. The candidate, William Rankin, has been out of the country since the election.

I, as campaign treasurer, specifically delayed medically required back surgery until after the election in order not to be incapacitated during a crucial time. I elected to have my surgery in January and have been unable to work due to surgeon's orders until March 13, 2015.

I was physically unable to remedy the indicated errors in the initial time allotted, however, am happy to confirm that these errors have indeed been corrected via amendment as of March 21, 2015.

Respectfully,

Jay M. Needelman, CPA
Treasurer

William Rankin Campaign

EXHIBIT

17



RE: William Rankin, #61112
Bronson, Kristi R.
to:
Tracie Aulet
04/09/2015 03:29 PM
Show Details

Security:

To ensure privacy, images from remote sites were prevented from downloading. Show Images

No, they are not in compliance. He made changes, but has not filed the reports that he changed. They are sitting in pending.

Regards,

*Kristi Reid Bronson, Chief
Division of Elections,
Bureau of Election Records
(850) 245-6240*

This response is provided for reference only and does not constitute legal advice or representation. As applied to a particular set of facts or circumstances, interested parties should refer to the Florida Statutes and applicable case law, and/or consult a private attorney before drawing any legal conclusions or relying upon the information provided. Please note: Florida has a very broad public records law. Written communications to or from state officials regarding state business constitute public records and are available to the public and media upon request unless the information is subject to a specific statutory exemption. Therefore, your e-mail message may be subject to public disclosure.

From: Tracie Aulet [<mailto:Tracie.Aulet@myfloridalegal.com>]
Sent: Thursday, April 09, 2015 2:55 PM
To: Bronson, Kristi R.
Subject: William Rankin, #61112

Good Afternoon Ms. Bronson,

I am the investigator assigned to investigate your referral of Jay Needelman for Mr. Needelman's failure to amend Mr. Rankin's 2015 Termination Report. In a written response to the referral, Mr. Needelman has stated the report was amended on March 21, 2015.

Please confirm the date Mr. Rankin's report was amended and whether the report is now in compliance.

Thank you,

Tracie L. Aulet
Investigation Specialist II
Florida Elections Commission
The Collins Building, Suite 224

EXHIBIT 18 (102)

107 West Gaines Street
Tallahassee, FL 32399

Please note that Florida has a broad public records law, and that all correspondence to me via e-mail may be subject to disclosure.

@ItsWorkingFL

What's Working Today

The Department of State is committed to excellence.
Please take our Customer Satisfaction Survey.

EXHIBIT

18 (2 of 2)

RECEIVED

2015 APR -7 1A 9:19

FILE

520 West 47th Street
Miami Beach, FL 33140
Telephone: 305.673.5040
Facsimile: 305.531.6779
jayneedelman.com
cpa160@aol.com

March 31, 2015

Florida Elections Commission
107 W. Gaines Street, Suite #224
Tallahassee FL 32399-1050

Attn: Amy McKeever Toman

Re: William "Will" Rankin Campaign case # FEC 15-271

Dear Ms. Toman:

I am in receipt of your department's correspondence dated March 24, 2015 (copy enclosed). I have responded via email as the previous notice dated earlier in March informed me that I may do.

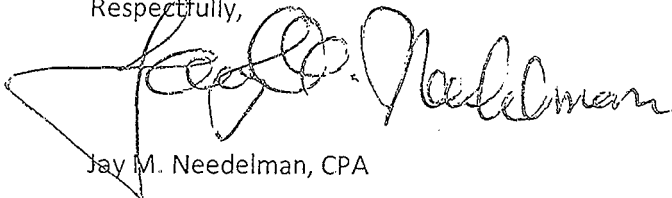
After the campaign concluded, the candidate, William Rankin, in early 2015, has taken up holiday overseas and will not return until mid-spring.

I, as the campaign treasurer, delayed, against physician orders, much needed spinal fusion surgery until after the campaign concluded. I then scheduled my surgery for March 2nd, the first available date. My post-operative instructions were very clear. I was not to resume work nor return to my business office for three (3) full weeks. Upon my return to work on March 23rd and having only then been in receipt of your department's correspondence, I immediately corrected the filing errors via the on-line reporting system and also followed with an email.

I respectfully ask for relief from the Florida Elections Commission due to the impossibility for me to carry out my duties in the critical time frame allotted.

Thank you kindly for reviewing my response to the case.

Respectfully,


Jay M. Needelman, CPA

STATE OF FLORIDA
COUNTY OF MIAMI DADE

The foregoing instrument was acknowledged before
me this 1 day of April, 2015.

by Jay M. Needelman

M. Rodriguez
Notary Public

My Commission Expires 5/8/2017



Mallin Rodriguez
Notary Public
State of Florida
My Commission Expires 05/08/2017
Commission No. FF 16548

EXHIBIT

19

INTANTS
INTANTS

CERTIFIED PUBLIC ACCOUNTANT

520 West 47th Street

Miami Beach, FL 33140

Telephone: 305.673.5040

Facsimile: 305.531.6779

jayneedelman.com

cpa160@aol.com

2015 APR -7 1A 9:19

FILED IN THE OFFICE OF THE
CLERK OF THE DISTRICT COURT

Florida Elections Commission
107 W. Gaines Street, Suite #224
Tallahassee FL 32399-1050

Re: William "Will" Rankin Campaign case # FEC 15-271

I am in receipt of your department's correspondence dated March 24, 2015 (copy enclosed). I have responded via email as the previous notice dated earlier in March informed me that I may do.

I, as the campaign treasurer, delayed, against physician orders, much needed spinal fusion surgery until after the campaign concluded. I then scheduled my surgery for March 2nd, the first available date. My post-operative instructions were very clear. I was not to resume work nor return to my business office for three (3) full weeks. Upon my return to work on March 23rd and having only then been in receipt of your department's correspondence, I immediately corrected the filing errors via the on-line reporting system and also followed with an email.

Thank you kindly for reviewing my response to the case.

The foregoing instrument was acknowledged before me this 1 day of April, 2015.

By Jay M. Needleman

Modugno

Notary Public

My Commission Expires 5/8/2017

~~Jay M. Needelman, CPA~~

Maflim Rodriguez
Notary Public
State of Florida

My Commission Expires 05/08/2017
Commission No. FF 16548

MEMBER

**AMERICAN INSTITUTE OF CERTIFIED PUBLIC ACCOUNTANTS
FLORIDA INSTITUTE OF CERTIFIED PUBLIC ACCOUNTANTS**



RECEIVED

FLORIDA ELECTIONS COMMISSION

107 W. Gaines Street,
Suite 224 Collins Building
Tallahassee, Florida 32399-1050
Telephone: (850) 922-4539
Fax: (850) 921-0783

2015 APR - 71 A 9:19

March 24, 2015

Jay M. Needelman
520 West 47th Street
Miami Beach, FL 33140-3028

RE: Case No.: FEC 15-271; Respondent: Jay M. Needelman

Dear Mr. Needelman:

On March 10, 2015, the Florida Elections Commission received a complaint alleging that you violated Florida's election laws. I have reviewed the complaint and find that it contains one or more legally sufficient allegations. The Commission staff will investigate the following alleged violations:

Section 106.07(2)(b)1., Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, failed to timely make necessary amendments to the campaign's 2015 TR report, as alleged in the complaint.

Section 106.19(1)(b), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, failed to report one or more contributions required to be reported by Chapter 106, Florida Statutes, as alleged in the complaint.

Section 106.19(1)(c), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, as alleged in the complaint.

Section 106.19(1)(d), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, made or authorized one or more expenditures prohibited by Chapter 106, Florida Statutes, as alleged in the complaint.

You may respond to the allegations above by filing a notarized statement providing any information regarding the facts and circumstances surrounding the allegations. Your response will be included as an attachment to the investigator's report.

When we conclude the investigation, a copy of the Report of Investigation will be mailed to you at the above address. You may file a response to the report within 14 days from the date the report is mailed to you. Based on the results of the investigation, legal staff will make a written recommendation to the Commission on whether there is probable cause to believe you have violated Chapter 104 or 106, Florida Statutes. A copy of the Staff Recommendation will be mailed to you and you may file a response within 14 days from the date the recommendation is mailed to you. Your timely filed response(s) will be considered by the Commission when determining probable cause.

The Commission will then hold a hearing to determine whether there is probable cause to believe you have violated Chapters 104 or 106, Florida Statutes. You and the complainant will receive a notice of hearing at least 14 days before the hearing. The notice of hearing will indicate the location, date, and time of your hearing. You will have the opportunity to make a brief oral statement to the Commission, but you will not be permitted to testify or call others to testify, or introduce any documentary or other evidence.

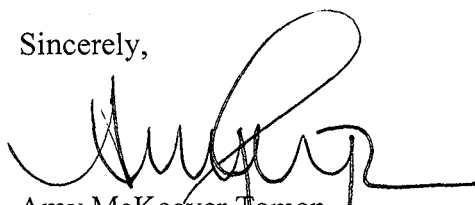
At any time before a probable cause finding, you may notify us in writing that you want to enter into negotiations directed towards reaching a settlement via consent agreement.

The Report of Investigation, Staff Recommendation, and Notice of Hearing will be mailed to the above address as this letter. Therefore, if your address changes, you must notify this office of your new address. Otherwise, you may not receive these important documents. Failure to receive the documents will not delay the probable cause hearing.

Under section 106.25, Florida Statutes, complaints, Commission investigations, investigative reports, and other documents relating to an alleged violation of Chapters 104 and 106, Florida Statutes, are confidential until the Commission finds probable cause or no probable cause. The confidentiality provision does not apply to the person filing the complaint. However, it does apply to you unless you waive confidentiality in writing. The confidentiality provision does not preclude you from seeking legal counsel. However, if you retain counsel, your attorney must file a notice of appearance with the Commission before any member of the Commission staff can discuss this case with him or her.

If you have any questions or need additional information, please contact **Tracie Aulet**, the investigator assigned to this case.

Sincerely,



Amy McKeever Toman
Executive Director

AMT/dam



FLORIDA ELECTIONS COMMISSION

107 W. Gaines Street,
Suite 224 Collins Building
Tallahassee, Florida 32399-1050
Telephone: (850) 922-4539
Fax: (850) 921-0783

March 24, 2015

Jay M. Needelman
520 West 47th Street
Miami Beach, FL 33140-3028

RE: Case No.: FEC 15-271; Respondent: Jay M. Needelman

Dear Mr. Needelman:

On March 10, 2015, the Florida Elections Commission received a complaint alleging that you violated Florida's election laws. I have reviewed the complaint and find that it contains one or more legally sufficient allegations. The Commission staff will investigate the following alleged violations:

Section 106.07(2)(b)1., Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, failed to timely make necessary amendments to the campaign's 2015 TR report, as alleged in the complaint.

Section 106.19(1)(b), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, failed to report one or more contributions required to be reported by Chapter 106, Florida Statutes, as alleged in the complaint.

Section 106.19(1)(c), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, as alleged in the complaint.

Section 106.19(1)(d), Florida Statutes: Respondent, treasurer for William Rankin, 2014 candidate for the office of Chief Financial Officer, made or authorized one or more expenditures prohibited by Chapter 106, Florida Statutes, as alleged in the complaint.

You may respond to the allegations above by filing a notarized statement providing any information regarding the facts and circumstances surrounding the allegations. Your response will be included as an attachment to the investigator's report.

When we conclude the investigation, a copy of the Report of Investigation will be mailed to you at the above address. You may file a response to the report within 14 days from the date the report is mailed to you. Based on the results of the investigation, legal staff will make a written recommendation to the Commission on whether there is probable cause to believe you have violated Chapter 104 or 106, Florida Statutes. A copy of the Staff Recommendation will be mailed to you and you may file a response within 14 days from the date the recommendation is mailed to you. Your timely filed response(s) will be considered by the Commission when determining probable cause.

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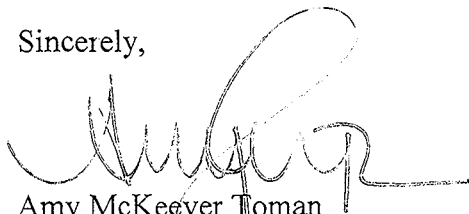
At any time before a probable cause finding, you may notify us in writing that you want to enter into negotiations directed towards reaching a settlement via consent agreement.

The Report of Investigation, Staff Recommendation, and Notice of Hearing will be mailed to the above address as this letter. Therefore, if your address changes, you must notify this office of your new address. Otherwise, you may not receive these important documents. Failure to receive the documents will not delay the probable cause hearing.

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If you have any questions or need additional information, please contact **Tracie Aulet**, the investigator assigned to this case.

Sincerely,



Amy McKeever Toman
Executive Director

AMT/dam

15-271



William "Will" Rankin Campaign

Cpa160

to:

fec

03/21/2015 06:44 PM

[Show Details](#)

Dear Ms. Malphurs,

I am in receipt of your communication dated March 16, 2015. The candidate, William Rankin, has been out of the country since the election.

I, as campaign treasurer, specifically delayed medically required back surgery until after the election in order not to be incapacitated during a crucial time. I elected to have my surgery in January and have been unable to work due to surgeon's orders until March 13, 2015.

I was physically unable to remedy the indicated errors in the initial time allotted, however, am happy to confirm that these errors have indeed been corrected via amendment as of March 21, 2015.

Respectfully,

Jay M. Needelman, CPA
Treasurer

William Rankin Campaign

**DIVISION OF ELECTIONS
FEC REFERRAL FORM**

RECEIVED

2015 MAR 10 P 1:16

To FEC from Division of Elections

STATE OF FLORIDA
FILED

Name: William "Will" Rankin
Account Number: 61112
Candidate: William "Will" Rankin
Treasurer: Jay M. Needelman
Person Named/Notified: Jay M. Needelman

The Division of Elections is referring this issue to the Florida Elections Commission pursuant to Section 106.25, Florida Statutes for the following reasons:

1. Addendums have not been filed pursuant to Section 106.07(2)(b)1., Florida Statutes, for the 2015 TR.
2. A review of Mr. Rankin's treasurer's reports reflect a negative balance in violation of Section 106.19(1)(b), (c) or (d), Florida Statutes, or all of the aforementioned.

Sent By: Kristi Reid Bronson
Date: March 6, 2015

KRB

jq

AFFIDAVIT

STATE OF FLORIDA

County of Leon

Kristi Reid Bronson, being duly sworn, says:

1. I am the Chief of the Bureau of Election Records of the Division of Elections (Division). In that capacity, I oversee the Division's duties related to the filing of campaign finance reports.
2. This affidavit is made upon my personal knowledge, including information obtained from review of the attached records, of which I am the custodian.
3. I am of legal age and competent to testify to the matters stated herein.
4. William Rankin (61112) was a 2014 candidate for the office of Chief Financial Officer.
5. On October 9, 2013, Mr. Rankin filed the Appointment of Campaign Treasurer and Designation of Campaign Depository with the Division. Mr. Rankin appointed Jay M. Needelman as treasurer. (See attached documents and acknowledgment letter.)
6. On February 5, 2015, the Division mailed Mr. Needelman notification that the 2015 TR report was incomplete. (See attached letter).
7. On February 19, 2015, the Division mailed Mr. Needelman final notification with delivery confirmation that the 2015 TR report was incomplete. (See attached letter).
8. As of March 6, 2015, the TR campaign finance report remains incomplete.

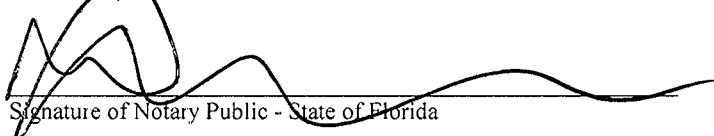
I hereby swear or affirm that the foregoing information is true and correct to the best of my knowledge.





Signature of Affiant

Sworn to (or affirmed) and subscribed before me this 6th day of March, 2015.



Signature of Notary Public - State of Florida

Print, Type, or Stamp Commissioned Name of Notary Public

Personally Known ☒

HISTORY NOTES
William "Will" Rankin - 61112

Unique ID	Date Recorded	Last Edited Date	Originally Recorded By
41062	2/2/2015 10:16:00 AM		SLBagley
RE: 2014 TR			
Received phone call from Mr. Rankin who had a few questions regarding the Termination Report that was due today.			
He asked what time it was due by. I said 11:59 pm EST today, 2/2/15			
He asked how to show a repayment of a loan to the candidate. I explained it would be on the expenditure side as a Disposition of Funds with a positive amount, and the purpose showing it was a repayment of loan to the candidate.			
He said he had some charges from the bank that as of right now have been taken out but the bank may give them back but he wouldn't know for sure on that until later. I explained he should report the charges as they are on the TR and if at a later date they refund him the money for the charges, then to go back into the TR and Amend it to show the refund and how he disposed of the money.			
He asked if he had to close the bank account today. I told him no; he just has to account for all the money in the TR today, but that he could leave the account open in case there are uncashed checks or refunds.			
He asked how the prorate refunds work. I explained there was a formula to follow in the candidate handbook			
He asked what to do if he got an invoice for something he wasn't expecting to. I explained that all expenditures should have been accounted for when they happened and that it was between him and the company that was issuing the invoice to decide if it was a legitimate invoice. But that if there was an outstanding invoice it would need to be paid before any other disposal of money in the campaign account.			
Slb			
36824	1/24/2014 4:51:00 PM		ddbeach
RE: Email Address			
Spoke w/Mr. Needelman/Treasurer - provided assistance in locating area in EFS for posting email addresses to the account - provided instructions for doing so			
35587	12/5/2013 4:32:00 PM		DSBrown
Spoke to Mr. Needleman He will amend M10 again tomorrow and call me before filing to ensure corrections are complete			

**APPOINTMENT OF CAMPAIGN TREASURER
AND DESIGNATION OF CAMPAIGN
DEPOSITORY FOR CANDIDATES**

(Section 106.021(1), F.S.)

(PLEASE PRINT OR TYPE)

NOTE: This form must be on file with the qualifying officer before opening the campaign account.

RECEIVED
DEPARTMENT OF STATE
2013 OCT -9 AM 10:13
DIVISION OF ELECTIONS
TALLAHASSEE, FL

OFFICE USE ONLY

1. CHECK APPROPRIATE BOX(ES):

☒ Initial Filing of Form Re-filing to Change: ☐ Treasurer/Deputy ☐ Depository ☐ Office ☐ Party

2. Name of Candidate (in this order: First, Middle, Last)

William Rankin

3. Address (include post office box or street, city, state, zip code)

265 S. Federal Hwy, #258
Deerfield Beach, FL 33441

4. Telephone

(954) 333-8968

5. E-mail address

info@rankin4cfo.com

6. Office sought (include district, circuit, group number)

CHIEF FINANCIAL OFFICER

7. If a candidate for a nonpartisan office, check if applicable:

☐ My intent is to run as a Write-In candidate.

8. If a candidate for a partisan office, check block and fill in name of party as applicable: My intent is to run as a

☐ Write-In ☐ No Party Affiliation ☒ DEMOCRATIC Party candidate

9. I have appointed the following person to act as my ☒ Campaign Treasurer ☐ Deputy Treasurer

10. Name of Treasurer or Deputy Treasurer

Jay M. Needelman, CPA

11. Mailing Address

520 West 47th Street

12. Telephone

(305) 673-5040

13. City

Miami Beach

14. County

Miami-Dade

15. State

FL

16. Zip Code

33140-3028

17. E-mail address

cpa160@aol.com

18. I have designated the following bank as my ☒ Primary Depository ☐ Secondary Depository

19. Name of Bank

Wells Fargo

20. Address

750 Arthur Godfrey Road

21. City

Miami Beach

22. County

Miami-Dade

23. State

FL

24. Zip Code

33140

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING FORM FOR APPOINTMENT OF CAMPAIGN TREASURER AND DESIGNATION OF CAMPAIGN DEPOSITORY AND THAT THE FACTS STATED IN IT ARE TRUE.

25. Date

October 4, 2013

26. Signature of Candidate

X 

27. Treasurer's Acceptance of Appointment (fill in the blanks and check the appropriate block)

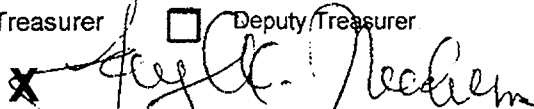
I, Jay M. Needelman, CPA, do hereby accept the appointment
(Please Print or Type Name)

designated above as:

☒ Campaign Treasurer ☐ Deputy Treasurer

October 4, 2013

Date

X 

Signature of Campaign Treasurer or Deputy Treasurer

**APPOINTMENT OF CAMPAIGN TREASURER
AND DESIGNATION OF CAMPAIGN
DEPOSITORY FOR CANDIDATES**

(Section 106.021(1), F.S.)

(PLEASE PRINT OR TYPE)

NOTE: This form must be on file with the qualifying officer before opening the campaign account.

RECEIVED
DEPARTMENT OF
2013 NOV 12 AM 11:12
DIVISION OF ELECTIONS

OFFICE USE ONLY

1. CHECK APPROPRIATE BOX(ES):

☐ Initial Filing of Form Re-filing to Change: ☐ Treasurer/Deputy ☒ Depository ☐ Office ☐ Party

2. Name of Candidate (in this order: First, Middle, Last)

William Rankin

3. Address (include post office box or street, city, state, zip code)

265 S. Federal Hwy, #258
Deerfield Beach, FL 33441

4. Telephone

(954) 333-8968

5. E-mail address

info@rankin4cfo.com

6. Office sought (include district, circuit, group number)

CHIEF FINANCIAL OFFICER

7. If a candidate for a nonpartisan office, check if applicable:

☐ My intent is to run as a Write-In candidate.

8. If a candidate for a partisan office, check block and fill in name of party as applicable: My intent is to run as a

☐ Write-In ☐ No Party Affiliation ☒ DEMOCRATIC Party candidate.

9. I have appointed the following person to act as my ☒ Campaign Treasurer ☐ Deputy Treasurer

10. Name of Treasurer or Deputy Treasurer

Jay M. Needelman, CPA

11. Mailing Address

520 West 47th Street

12. Telephone

(305) 673-5040

13. City

Miami Beach

14. County

Miami-Dade

15. State

FL

16. Zip Code

33140-3028

17. E-mail address

cpa160@aol.com

18. I have designated the following bank as my

☒ Primary Depository ☐ Secondary Depository

19. Name of Bank

SunTrust Bank

20. Address

800 S. Federal Highway

21. City

Boca Raton

22. County

Palm Beach

23. State

FL

24. Zip Code

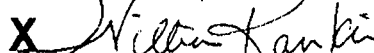
33432

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING FORM FOR APPOINTMENT OF CAMPAIGN TREASURER AND DESIGNATION OF CAMPAIGN DEPOSITORY AND THAT THE FACTS STATED IN IT ARE TRUE.

25. Date

October 24, 2013

26. Signature of Candidate



27

Treasurer's Acceptance of Appointment (fill in the blanks and check the appropriate block)

I, Jay M. Needelman, CPA, do hereby accept the appointment
(Please Print or Type Name)

designated above as:

☒ Campaign Treasurer ☐ Deputy Treasurer

October 31, 2013

Date



Signature of Campaign Treasurer or Deputy Treasurer

**STATEMENT OF
CANDIDATE**

(Section 106.023, F.S.)

(Please print or type)

OFFICE USE ONLY **ED**

13 OCT -2 AM 10:10

DIVISION OF ELECTIONS
SECRETARY OF STATE

I, WILLIAM RANKIN,

candidate for the office of CHIEF FINANCIAL OFFICER;

have been provided access to read and understand the requirements of
Chapter 106, Florida Statutes.

X



Signature of Candidate

October 1, 2013

Date

Each candidate must file a statement with the qualifying officer within 10 days after the Appointment of Campaign Treasurer and Designation of Campaign Depository is filed. Willful failure to file this form is a first degree misdemeanor and a civil violation of the Campaign Financing Act which may result in a fine of up to \$1,000, (ss. 106.19(1)(c), 106.265(1), Florida Statutes).



FLORIDA DEPARTMENT of STATE

RICK SCOTT
Governor

KEN DETZNER
Secretary of State

October 10, 2013

William Rankin
265 South Federal Highway, #258
Deerfield Beach, Florida 33441

Dear Mr. Rankin:

This will acknowledge receipt of the Appointment of Campaign Treasurer and Designation of Campaign Depository for the office of Chief Financial Officer, which was placed on file in our office on October 9, 2013. Your name has been placed on the 2014 active candidate list.

Campaign Treasurer's Reports

Your first campaign treasurer's report will be due on **November 12, 2013**. The report will cover the period of October 1-31, 2013 (M10). All candidates who file reports with the Division of Elections are required to file by means of the Division's Electronic Filing System (EFS).

Credentials and Sign-ons

Below is the web address to access the EFS and your user identification number. The enclosed sealed envelope contains your initial password. Once you have logged in using the initial password, you will be immediately prompted to change it to a confidential sign-on. You, your campaign treasurer, and deputy treasurers are responsible for protecting this password from disclosure and are responsible for all filings using these credentials, unless the Division is notified that your credentials have been compromised.

EFS Website Address: <https://efs.dos.state.fl.us>

Identification Number: 61112



Division of Elections
R.A. Gray Bldg., Rm. 316 • 500 S Bronough St. • Tallahassee, Florida 32399-0250
Telephone: (850) 245-6240 • Facsimile: (850) 245-6259 elections.myflorida.com
Commemorating 500 years of Florida history www.fl500.com



Mr. William Rankin
October 10, 2013
Page Two

Pin Numbers

Pin numbers are confidential secure credentials that allow you to submit reports and update personal information. The enclosed sealed envelope contains confidential pin numbers for you. By copy of this letter, a confidential pin number to access the EFS was sent to your treasurer.

Each candidate is required to provide the Division of Elections with confidential personal information that may be used to allow access in the event this password is forgotten or lost. When you enter the campaign account screen, there will be a drop down box where you pick a question (such as *What is your mother's maiden name?*) and supply an answer. All passwords and answers to questions are stored as encrypted data and cannot be viewed by Division staff and given out over the phone. Please notify the Division if your credentials have been compromised.

Timely Filing

All reports filed must be completed and filed through the EFS not later than midnight of the due date. Reports not filed by midnight of the due date are late filed and subject to the penalties in Section 106.07(8), Florida Statutes. In the event that the EFS is inoperable on the due date, the report will be accepted as timely filed if filed no later than midnight of the first business day the EFS becomes operable. No fine will be levied during the period the EFS was inoperable.

Any candidate failing to file a report on the designated due date shall be subject to a fine of \$50 per day for the first 3 days late and, thereafter, \$500 per day for each late day, not to exceed 25% of the total receipts or expenditures, whichever is greater, for the period covered by the late report. However, for reports immediately preceding each primary and general election, the fine shall be \$500 per day for each late day, not to exceed 25% of the total receipts or expenditures, whichever is greater, for the period covered by the late report.

Electronic Receipts

The person submitting the report on the EFS will be issued an electronic receipt indicating and verifying the report was filed. Each campaign treasurer's report filed by means of the EFS is considered to be under oath by the candidate and campaign treasurer and such persons are subject to the provisions of Section 106.07(5), Florida Statutes.

Mr. William Rankin
October 10, 2013
Page Three

Instructions and Assistance

An online instruction guide is available to you on the EFS to assist with navigation, data entry, and submission of reports. The Division of Elections will also provide assistance to all users by contacting the EFS Help Desk at (850) 245-6280.

All of the Division's publications and reporting forms are available on the Division of Elections' website at <http://elections.myflorida.com>. It is your responsibility to read, understand, and follow the requirements of Florida's election laws. Therefore, please print a copy of the following documents: Chapters 104 and 106, Florida Statutes, *2012 Candidate and Campaign Treasurer Handbook*, *2013 Calendar of Reporting Dates*, and Rule 1S-2.017, Florida Administrative Code.

Please let me know if you need additional information.

Sincerely,



Kristi Reid Bronson, Chief
Bureau of Election Records

KRB/ljr

Enclosures

pc: Mr. Jay M. Needelman, Treasurer



FLORIDA DEPARTMENT OF STATE

Ken Detzner
Secretary of State

DIVISION OF ELECTIONS

February 5, 2015

Jay M. Needelman, Treasurer for
Candidate William "Will" Rankin
520 West 47th Street
Miami Beach, FL 33140-3028

Re: CAN 61112

Dear Mr. Needelman:

The Division of Elections has determined that the following report is incomplete for the reasons noted in the attached error report:

<i>Year</i>	<i>Type</i>	<i>Cover Period</i>
2015	TR	10/31/14 - 2/2/15

Pursuant to Section 106.07(2), Florida Statutes, you have 7 days from receipt of this notice to file an amended report to correct errors or provide missing information. If the information has been reported accurately, provide a written explanation to the Division addressing the issue noted in the error report. Please be advised that failure to supply this information within the time allowed may constitute a violation of Chapter 106, Florida Statutes.

If you need assistance in filing an amendment, please contact the Division's help line at (850) 245-6280.

Sincerely,

Kristi Reid Bronson
Chief, Bureau of Election Records

Attachment

cc: William "Will" Rankin, Candidate

Error Report

Candidate: William "Will" Rankin

Office: CFO

Report: 2015 TR (34) Covering Period: 10/31/14 - 2/2/15

Account: 61112

Contributions

Expenditures

<u>Seq</u>	<u>Date</u>	<u>Name</u>	<u>Address</u>	<u>City/State/Zip</u>	<u>Type</u>	<u>Expenditure Purpose</u>	<u>Amount</u>	<u>Amend</u>
1	11/03/14	SHELL	11302 N DALE MABRY HWY	TAMPA, FL 3-3618	REF	CAMPAIGN TRAVEL	\$0.32	
*Refunds must be negative amounts								
6	10/31/14	NEEDELMAN JAY	520 WEST 47TH STREET	MIAMI BEACH FL 3-3140	MON	CAMPAIGN PROFESSIONAL FEES	\$0.00	
*Amount is Zero								
36	02/02/15	RANKIN WILLIAM	265 S FEDERAL HWY	DEERFIELD BEACH FL 3-3334	DIS	TO REPAY CAMPAIGN LOAN	\$0.00	
*Amount is Zero								

Fund Transfers

Other Distributions

Sum of Contributions vs Expenditures

2/5/2015 8:07:50 AM

William "Will" Rankin

61112

Date of last Contribution: 10/31/14

0 After

Year	Report	Contributions	Expenditures	Running Total
2013	M10	\$10,625.00	\$672.58	\$9,952.42
	M11	\$151.00	\$2,287.42	\$7,816.00
	M12	\$5,025.00	\$387.03	\$12,453.97
2014	M1	\$373.99	\$594.55	\$12,233.41
	M2	\$100.00	\$678.88	\$11,654.53
	M3	\$0.00	\$582.16	\$11,072.37
	M4	\$2,431.00	\$1,590.34	\$11,913.03
	M5	\$4,950.00	\$6,562.80	\$10,300.23
	P1	\$50.00	\$8,572.93	\$1,777.30
	P1A	\$125.00	\$178.33	\$1,723.97
	P2	\$510.00	\$34.00	\$2,199.97
	P2A	\$100.00	\$622.24	\$1,677.73
	P3	\$2,500.00	\$393.24	\$3,784.49
	P4	\$10.00	\$61.18	\$3,733.31
	P5	\$55.00	\$217.24	\$3,571.07
	P6	\$705.00	\$792.10	\$3,483.97
	P7	\$100.00	\$1,426.01	\$2,157.96
	P7A	\$0.00	\$155.11	\$2,002.85
	G1	\$0.00	\$2,017.74	(\$14.89)
	G1A	\$2,000.00	\$955.24	\$1,029.87
	G2	\$0.00	\$164.50	\$865.37
	G2A	\$660.00	\$283.85	\$1,241.52
	G3	\$500.00	\$269.09	\$1,472.43
	G4	\$1,110.00	\$930.19	\$1,652.24
	G5	\$150.00	\$306.58	\$1,495.66
	G6	\$2,050.00	\$335.04	\$3,210.62
	G7	\$100.00	\$98.16	\$3,212.46
	D1	\$870.00	\$93.70	\$3,988.76
	D2	\$0.00	\$0.00	\$3,988.76

Sum of Contributions vs Expenditures

2/5/2015 8:07:51 AM

William "Will" Rankin

61112

Date of last Contribution: 10/31/14

0 After

Year	Report	Contributions	Expenditures	Running Total
2014	D3	\$0.00	\$0.00	\$3,988.76
	D4	\$50.00	\$904.73	\$3,134.03
	D5	\$88.00	\$44.06	\$3,177.97
	D6	\$0.00	\$356.42	\$2,821.55
2015	TR	\$1,100.00	\$1,850.09	\$2,071.46
Campaign Total:		\$36,488.99	\$34,417.53	



FLORIDA DEPARTMENT OF STATE

Ken Detzner
Secretary of State

DIVISION OF ELECTIONS

FINAL NOTICE

Delivery Confirmation:

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& CUSTOMER
RECEIPT

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For Tracking or inquiries go to USPS.com
or call 1-800-222-1811.

February 19, 2015

Jay M. Needelman, Treasurer for
Candidate William "Will" Rankin
520 West 47th Street
Miami Beach, FL 33140-3028

Re: CAN 61112

Dear Mr. Needelman:

You have previously been advised that the campaign treasurer's report(s) listed below is incomplete for the reasons noted in the attached error report:

<i>Year</i>	<i>Type</i>	<i>Cover Period</i>
2015	TR	10/31/14 - 2/2/15

Pursuant to Section 106.07(2), Florida Statutes, you have 7 days from receipt of this letter to correct errors or provide missing information. If the information has been reported accurately, you must provide a written explanation to the Division addressing the issue noted in the error report. Please be advised that if you fail to comply with this request, the Division will forward this matter to the Florida Elections Commission for further action. Section 106.265(1), Florida Statutes, authorizes the Florida Elections Commission to impose civil penalties of up to \$1,000 per violation.

If you need assistance in filing an amendment, please contact the Division's help line at (850) 245-6280.

Sincerely,

Kristi Reid Bronson
Chief, Bureau of Election Records

Attachment

cc: William "Will" Rankin, Candidate

Florida Department of State - Division of Elections
Compliance Report

Candidate: William "Will" Rankin		Office: CFO
Report: 2015 TR (34)	Covering Period: 10/31/14 - 2/2/15	Account: 61112

all

<u>Statute</u>	<u>FAC</u>	<u>Description</u>
16.11(3)		Deficit balance

Contributions

Expenditures

Transfers

Re distributions

Sum of Contributions vs Expenditures

2/19/2015 8:43:13 AM

William "Will" Rankin

61112

Date of last Contribution: 10/31/14

0 After

Year	Report	Contributions	Expenditures	Running Total
2013	M10	\$10,625.00	\$672.58	\$9,952.42
	M11	\$151.00	\$2,287.42	\$7,816.00
	M12	\$5,025.00	\$387.03	\$12,453.97
2014	M1	\$373.99	\$594.55	\$12,233.41
	M2	\$100.00	\$678.88	\$11,654.53
	M3	\$0.00	\$582.16	\$11,072.37
	M4	\$2,431.00	\$1,590.34	\$11,913.03
	M5	\$4,950.00	\$6,562.80	\$10,300.23
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	P4	\$10.00	\$61.18	\$3,733.31
	P5	\$55.00	\$217.24	\$3,571.07
	P6	\$705.00	\$792.10	\$3,483.97
	P7	\$100.00	\$1,426.01	\$2,157.96
	P7A	\$0.00	\$155.11	\$2,002.85
	G1	\$0.00	\$2,017.74	(\$14.89)
	G1A	\$2,000.00	\$955.24	\$1,029.87
	G2	\$0.00	\$164.50	\$865.37
	G2A	\$660.00	\$283.85	\$1,241.52
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	G6	\$2,050.00	\$335.04	\$3,210.62
	G7	\$100.00	\$98.16	\$3,212.46
	D1	\$870.00	\$93.70	\$3,988.76
	D2	\$0.00	\$0.00	\$3,988.76

Sum of Contributions vs Expenditures

2/19/2015 8:43:13 AM

William "Will" Rankin

61112

Date of last Contribution: 10/31/14

0 After

Year	Report	Contributions	Expenditures	Running Total
2014	D3	\$0.00	\$0.00	\$3,988.76
	D4	\$50.00	\$904.73	\$3,134.03
	D5	\$88.00	\$44.06	\$3,177.97
	D6	\$0.00	\$356.42	\$2,821.55
2015	TR	\$1,100.00	\$4,082.53	(\$160.98)
Campaign Total:		\$36,488.99	\$36,649.97	

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LOCATION

February 23, 2015 , 6:03
pm

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Your item was delivered in or at the mailbox at 6:03 pm on February 23, 2015 in MIAMI BEACH, FL 33140

February 23, 2015 , 12:15
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February 23, 2015 , 12:05
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February 23, 2015 , 10:54
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February 22, 2015 , 12:45
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OPA LOCKA, FL 33054

February 21, 2015 , 12:46
am

Departed USPS Facility

TALLAHASSEE, FL 32301

February 20, 2015 , 8:37 pm

Arrived at USPS Facility

TALLAHASSEE, FL 32301

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