

STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION

**In Re: Business Political Action Committee of  
Palm Beach County**

**Case No.: FEC 16-668**

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**TO:** Robert J. Harvey, Esquire  
Jenks & Harvey LLP  
1555 Palm Beach Lakes Blvd., 16th Floor  
West Palm Beach, FL 33401

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

**NOTICE OF HEARING (AUTOMATIC FINE)**

A hearing will be held in this case before the Florida Elections Commission on, **May 17, 2017 at 8:30 am, or as soon thereafter as the parties can be heard**, at the following location: **Augustus B. Turnbull Conference Center, 555 West Pensacola Street, Room 214, Tallahassee, Florida 32301**

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

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

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

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

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

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

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

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

**See further instructions on the reverse side.**

**Amy McKeever Toman**  
Executive Director  
Florida Elections Commission  
May 1, 2017

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

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

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

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

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

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

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



**FLORIDA ELECTIONS COMMISSION**

**107 W. Gaines Street, Suite 224  
Collins Building  
Tallahassee, Florida 32399-1050  
(850) 922-4539**

March 13, 2017

Robert J. Harvey, Esquire  
Jenks & Harvey LLP  
1555 Palm Beach Lakes Blvd., 16th Floor  
West Palm Beach FL 33401

**RE: Case No.: FEC 16-668; Respondent: Business Political Action Committee of Palm Beach County**

Dear Mr. Harvey:

The Florida Elections Commission at its last regularly scheduled meeting was unable to hear this case. Therefore, this case has been rescheduled for its next meeting, which is scheduled for May 16-17, 2017 in Tallahassee. A notice of hearing will be mailed approximately 14 days before the hearing.

If you have any questions, please contact us at the number listed above or at [fec@myfloridalegal.com](mailto:fec@myfloridalegal.com).

Sincerely,

*Donna Ann Malphurs*  
Agency Clerk

/dam

cc: Division of Elections, Complainant

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**In Re: Business Political Action Committee of  
Palm Beach County**

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**Case No.: FEC 16-668**

**TO:** Robert J. Harvey, Esquire  
Jenks & Harvey LLP  
1555 Palm Beach Lakes Blvd., 16th Floor  
West Palm Beach, FL 33401

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

**NOTICE OF HEARING (AUTOMATIC FINE)**

A hearing will be held in this case before the Florida Elections Commission on, **February 28, 2017 at 11:00 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.

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**See further instructions on the reverse side.**

*Amy McKeever Toman*  
Executive Director  
Florida Elections Commission  
February 13, 2017



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**FLORIDA ELECTIONS COMMISSION**  
**CASE REPORT**  
**Case Number: FEC-16-668**

**NAME:** **BUSINESS POLITICAL ACTION COMMITTEE OF PALM BEACH COUNTY**

**DATE APPEAL RECEIVED:** 9/28/16

**DATE REPORT DUE:** 8/12/16 (2016 P5)

**DATE OF ELECTRONIC RECEIPT:** 8/12/16<sup>1</sup>

**DATE FILING OFFICER RECEIVED REPORT:** 8/12/16

**NUMBER OF DAYS LATE:** 0

**AMOUNT OF FINE:** \$1,250.00

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

**TOTAL RECEIPTS FOR REPORTING PERIOD:** \$5,000.00

**TOTAL EXPENDITURES FOR REPORTING PERIOD:** \$0

**DATE FIRST NOTIFICATION WAS SENT:** 8/30/16

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

**SUMMARY:** Business Political Action Committee of Palm Beach County is a political committee (PC) registered with the State of Florida. The PC's chair is John Smith and its treasurer is E. Llwyd Ecclestone Jr. This PC is being represented by Robert J. Harvey, Esq, from the Jenks & Harvey Law Firm.

The PC is appealing the fine claiming that unusual circumstances existed that caused the 2016 P5 Report to be untimely filed. According to Mr. Harvey, "Numerous times over the years, representatives from local and state elections offices have informed BIZPAC to always file reports on time, and to resolve any errors in the filing, by later filing an amendment. It was reasonable for BIZPAC to rely on the previous advice, and to amend the timely filed waiver to include the contribution at issue. While the rule cites some examples of what unusual circumstances shall include, those circumstances are not solely limited to the examples given in the rule.

- The 2016 P5 Report covers the time period from 7/30/16 through 8/5/16.
- The 2016 P5 Queued-Transactions Report reflects that this report was created on 8/12/16 at approximately 1:47 pm, before being filed on 8/12/16 at approximately 1:48 pm.<sup>2</sup>
- In a 1/17/17 email with Kristi Reid-Bronson, FEC staff was informed, "The committee filed a notice of no activity (waiver) on 8/12/16. A waiver is not a report. On 8/29/16, the committee filed a report showing \$5000 of activity. The fine is based on 25% of the activity".

**PRIOR CASES:** None

<sup>1</sup> Respondent initially filed a waiver that reflected no activity occurred during the 2016 P5 reporting period. Respondent later filed a 2016 P5 Report to reflect financial activity.

<sup>2</sup> The report discussed in this bullet refers to the waiver that reflected zero activity.

September 19, 2016

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

RECEIVED

2016 SEP 28 1P 3:59

STATE OF FLORIDA  
ELECTIONS COMMISSION

**Re: Appeal of Fine Automatically Assessed by Filing Officer  
Business Political Action Committee of Palm Beach County-PAC 61007  
P.O. Box 3267  
West Palm Beach, FL 33402-3402**

Dear Sir/Madam,

Please be advised that ~~our firm has been retained~~ to represent the Business Political Action Committee of Palm Beach County ("BIZPAC") in the above matter. BIZPAC is not requesting a hearing on this appeal.

On August 30, 2016 BIZPAC was notified by the Division of Elections that it had been automatically assessed a late fine of \$1,250.00 for the late filing of its campaign treasurer's report that was due on August 12, 2016, and was filed on August 29, 2016. A true and accurate copy of the letter is attached as "**Exhibit 1.**"

**Background**

BIZPAC has been operating since the late 1990s, first registered as a Committee of Continuous Existence, and later as a Political Committee. BIZPAC has always been conscientious about filing reports in a timely manner and only once in the past twenty-plus years was a report considered filed late. At that time, reports were mailed. The report in questions was mailed on the Friday deadline date, but the post office did not postmark the envelope. Since the report was not sent certified mail and not received in Tallahassee until on Monday, it was considered three days late.

Numerous times over the years, representatives from the local and state elections offices have informed BIZPAC to always file reports on time, and to resolve any errors in the filing, by later filing an amendment.

BIZPAC is required to file on a weekly basis as the election approaches. Since BIZPAC has very little activity it is mostly filing waivers. The original waiver report was timely filed on August 12, 2016. A true and accurate copy of the confirmation of the filing is attached as "**Exhibit 2.**"

A check arrived during a week when BIZPAC filed a waiver, and it was originally not reported. On August 29, 2016, in good faith, and based on the previous advice from the election offices, BIZPAC amended the original waiver report, adding the contribution. A true and accurate copy of the confirmation of the filing is attached as "**Exhibit 3.**"

BIZPAC was subsequently informed that a waiver cannot be amended because it is not considered a report, and the amendment must be filed by the date due for regular reports.

Finally, enclosed is the report summary showing the amendment, and the contribution page confirming that the contribution has been reported. A true and accurate copy of the report summary and contribution page is attached as "**Exhibit 4.**"

**Argument**

Rule 2B-1.0055 states as follows:

**Late-filed Reports; Unusual Circumstances.**

(1) Unusual circumstances mean *uncommon, rare or sudden events* over which the actor has no control and which directly result in the failure to act according to the filing requirements. Unusual circumstances must occur within a time period that would clearly prevent the person legally responsible for filing the report from doing so in a timely manner. (emphasis added)

As stated above, numerous times over the years, representatives from local and state elections offices have informed BIZPAC to always file reports on time, and to resolve any errors in the filing, by later filing an amendment. It was reasonable for BIZPAC to rely on the previous advice, and to amend the timely filed waiver to include the contribution at issue. While the rule cites some examples of what unusual circumstances shall include, those circumstances are not solely limited to the examples given in the rule.


In fact, Rule 2B-1.0055 **Late-filed Reports; Unusual Circumstances**, section (2) merely states only that unusual circumstances shall not include the following:

- (a) Failure of the United States Postal Service or other mail delivery service to postmark an envelope, legibly postmark an envelope, or timely deliver mail.
- (b) Failure of the sender to affix sufficient postage to a report that is being mailed.

In closing, in accordance with Rule 2B-1.005(3), BIZPAC has demonstrated that there exist unusual or other circumstances that caused the report to be filed late. Therefore, BIZPAC respectfully requests that this appeal be granted.

If you have any questions or concerns regarding the above, please contact me directly at [rharvey@jenksharveylaw.com](mailto:rharvey@jenksharveylaw.com) or at (561) 303-2918.

Very truly yours,



Robert J. Harvey, Esq.

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was sent on this **19<sup>th</sup> day of September, 2016** to the following on the attached service list:

Respectfully submitted,

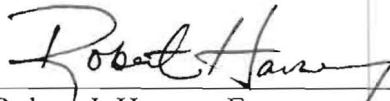
**JENKS & HARVEY LLP**

1555 Palm Beach Lakes Blvd., 16<sup>th</sup> Floor

West Palm Beach, FL 33401

Phone: 561-303-2918; Fax 561-419-9828

Attorneys for BIZPAC



Robert J. Harvey, Esq.

Florida Bar No.: 66193

[rharvey@jenksharveylaw.com](mailto:rharvey@jenksharveylaw.com)

**SERVICE LIST**

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

Florida Division of Elections (via email only to [DivElections@dos.state.fl.us](mailto:DivElections@dos.state.fl.us) )  
John Smith, Chairperson (via email only)  
E. Llwyd Ecclestone Jr., Treasurer (via email only)

**EXHIBIT “1”**



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

August 30, 2016

E. Llwyd Ecclestone Jr., Treasurer  
Business Political Action Committee of Palm Beach County  
Post Office Box 3267  
West Palm Beach, FL 33402-3402

PAC 61007

Dear Mr. Ecclestone:

The campaign treasurer's report that was due on August 12, 2016, was filed on August 29, 2016. By law, you are automatically assessed a late fine of \$1,250.00.

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

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

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

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

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

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

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


Sincerely,

Kristi Reid Bronson, Chief  
Bureau of Election Records

cc: John Smith, Chairperson

**EXHIBIT “2”**



 Filed Report Receipt

**\*\* Report has been Filed \*\***

**ID: 61007      Name: Business Political Action Committee of Palm Beach County**

**Report: 2016 - P5 - 61**

**Print Date: 8/12/2016 1:48:26 PM**

**Election: 2016 General Election**

**Covers: 7/30/2016-8/5/2016**

**Due: 8/12/2016**

**Amended**

**Waiver**

**Filed: 8/12/2016 1:48:27 PM**

**File Status: Submitted Report for Filing**

**Reviewed: 8/12/2016**

**Review Status: Reviewed**

**Detail Complete: No Detail Records Found**

**File Method: Web Filed**  
**Entry Method: Web Data Entry**

**Number of Detail Records**

**Contributions: 0**

**Expenditures: 0**

**Fund Transfers: 0**


**Distributions: 0**

**Pending Queued Items: 0**

To Print: Right Click Mouse and Select 'Print'

[Go to Filed Report List](#)

**EXHIBIT “3”**

 Filed Report Receipt

**\*\* Report has been Filed \*\***

**ID: 61007      Name: Business Political Action Committee of Palm Beach County**

**Report: 2016 - P5 - 61**

**Print Date: 8/29/2016 2:18:17 PM**

**Election: 2016 General Election**

**Covers: 7/30/2016-8/5/2016**

**Due: 8/12/2016**

**Amended**       **Waiver**

**Filed: 8/29/2016 2:18:18 PM**

**File Status: Submitted Report for Filing**

**Reviewed: 8/29/2016**

**Review Status: Reviewed**

**Detail Complete: Complete Detail Records**

**File Method: Web Filed**

**Number of Detail Records**

**Entry Method: Web Data Entry**

**Contributions: 1**

**Expenditures: 0**

**Pending Queued Items: 0**

**Fund Transfers: 0**

**Distributions: 0**

**To Print: Right Click Mouse and Select 'Print'**

[Go to Filed Report List](#)

*Add Wantman Group contrib  
# 5,000*

**EXHIBIT “4”**

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

(1) Business Political Action Committee of Palm Beach County (2) 61007  
 Candidate, Committee or Party Name I.D. Number

(3) 224 Datura Street West Palm Beach FL 33401  
 Address (number and street) City State Zip Code

Check box if address has changed since last report

(4) Check appropriate box(es):

Candidate (office sought):  
 Political Committee  Check If PC has DISBANDED  
 Committee of Continuous Existence  Check If CCE has DISBANDED  
 Party Executive Committee

(5) REPORT IDENTIFIERS

Cover Period: From 07/30/2016 To 08/05/2016 Report Type: P5

Original  Amendment  Special Election Report

(6) CONTRIBUTIONS THIS REPORT

Cash & Checks	\$5,000.00
Loans	\$0.00
<i>Total Monetary</i>	\$5,000.00
In-Kind	\$0.00

(7) EXPENDITURES THIS REPORT

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

(8) Other Distributions

Certification

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

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

Name of  Treasurer  Deputy Treasurer

X  
Signature

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

Name of  Candidate  Chairman (PC/PTY Only)

X  
Signature

Name: Business Political Action Committee of Palm Beach County Report: 2016 P5 Period: 07/30/2016 to 08/05/2016

**\*\* 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	WANTMAN GROUP, INC.	B	SURVEYING	\$5,000.00
08/02/2016	2035 VISTA PARKWAY WEST PALM BEACH, FL 33411	CHE		ADD



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**

Secretary of State

DIVISION OF ELECTIONS

September 14, 2016

E. Llwyd Ecclestone Jr., Treasurer  
Business Political Action Committee of Palm Beach County  
Post Office Box 3267  
West Palm Beach, FL 33402-3402

PAC 61007

Dear Mr. Ecclestone:

The campaign treasurer's report that was due on August 12, 2016, was filed on August 29, 2016. By law, you are automatically assessed a late fine of \$1,250.00.

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

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

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

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

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

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

Sincerely,

Kristi Reid Bronson, Chief  
Bureau of Election Records

cc: John Smith, Chairperson



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

August 30, 2016

E. Llwyd Ecclestone Jr., Treasurer  
Business Political Action Committee of Palm Beach County  
Post Office Box 3267  
West Palm Beach, FL 33402-3402

PAC 61007

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

Sincerely,

Kristi Reid Bronson, Chief  
Bureau of Election Records

cc: John Smith, Chairperson



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

(1) Business Political Action Committee of Palm Beach County (2) 61007  
 Candidate, Committee or Party Name I.D. Number

(3) 224 Datura Street West Palm Beach FL 33401  
 Address (number and street) City State Zip Code

Check box if address has changed since last report

(4) Check appropriate box(es):

Candidate (office sought):  
 Political Committee  Check If PC has DISBANDED  
 Committee of Continuous Existence  Check If CCE has DISBANDED  
 Party Executive Committee

(5) REPORT IDENTIFIERS

Cover Period: From 07/30/2016 To 08/05/2016 Report Type: P5

Original  Amendment  Special Election Report

(6) CONTRIBUTIONS THIS REPORT

(7) EXPENDITURES THIS REPORT

Cash & Checks \$5,000.00  
 Loans \$0.00  
*Total Monetary* \$5,000.00  
 In-Kind \$0.00

Monetary Expenditures \$0.00  
 Transfers to Office Account \$0.00  
*Total Monetary* \$0.00

(8) Other Distributions

Certification

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

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

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

Name of  Treasurer  Deputy Treasurer

Name of  Candidate  Chairman (PC/PTY Only)

X  
Signature

X  
Signature

Name: Business Political Action Committee of Palm Beach County Report: 2016 P5 Period: 07/30/2016 to 08/05/2016

\*\* 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	WANTMAN GROUP, INC. 2035 VISTA PARKWAY WEST PALM BEACH, FL 33411	B	SURVEYING	\$5,000.00
08/02/2016		CHE		ADD

ID:

# CAMPAIGN TREASURER'S REPORT – ITEMIZED EXPENDITURES

Name: Business Political Action Committee of Palm Beach County Report: 2016 P5 Period: 07/30/2016 to 08/05/2016

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

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

ID:

**CAMPAIGN TREASURER'S REPORT – ITEMIZED DISTRIBUTIONS**

Name: Business Political Action Committee of Palm Beach County Report: 2016 P5 Period: 07/30/2016 to 08/05/2016

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

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

ID:

# CAMPAIGN TREASURER'S REPORT - ITEMIZED FUND TRANSFERS

Name: Business Political Action Committee of Palm Beach County Report: 2016 P5 Period: 07/30/2016 to 08/05/2016

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

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

**Queued Items for 2016-P5**

Account: 61007

**Business Political Action Committee of Palm Beach County**

Rpt Seq: 61

<i>ProcessDescription</i>	<i>Status</i>	<i>Submitter</i>	<i>Created</i>	<i>LastUpdate</i>
Create Pending Report	Processing Complete	61007	8/12/2016 1:47:46 PM	8/12/2016 1:47:46 PM
Review Pending Report	Processing Complete	61007	8/12/2016 1:47:49 PM	8/12/2016 1:47:49 PM
File Pending Report	Processing Complete	61007	8/12/2016 1:48:27 PM	8/12/2016 1:48:27 PM
Amend Filed Report	Processing Complete	61007	8/29/2016 2:14:15 PM	8/29/2016 2:14:15 PM
Review Pending Report	Processing Complete	61007	8/29/2016 2:17:47 PM	8/29/2016 2:17:47 PM
File Pending Report	Processing Complete	61007	8/29/2016 2:18:18 PM	8/29/2016 2:18:18 PM
Review Filed Report	Processing Complete	ejrowlette	9/6/2016 10:49:40 AM	9/6/2016 10:49:40 AM



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Florida Department of State - Division of Elections

Florida Election System Reports

Candidate/Committee Lookup

Committee Name: Business Political Action Committee of Palm Beach County

Name:

Account: 61007

Election:

Acct:

Type:

Date Due	Type	Date Filed	Status	Days Late	Fine Assessed	Appealed	Amount Fined	Amount Paid
1/10/2017	M12	1/10/2017						
12/12/2016	M11	12/9/2016						
11/4/2016	D6	11/3/2016						
11/4/2016	G7	11/4/2016						
11/2/2016	D5	11/1/2016						
11/1/2016	D4	10/31/2016						
10/31/2016	D3	10/31/2016						
10/30/2016	D2	10/29/2016						
10/29/2016	D1	10/29/2016						
10/28/2016	G6	10/25/2016						
10/21/2016	G5	10/18/2016						
10/14/2016	G4	10/12/2016						
10/7/2016	G3	10/4/2016						
9/30/2016	G2A	9/28/2016						
9/23/2016	G2	9/20/2016						
9/16/2016	G1A	9/15/2016						
9/9/2016	G1	9/9/2016						
9/2/2016	P7A	9/1/2016						
8/26/2016	P7	8/26/2016						
8/19/2016	P6	8/19/2016						
8/12/2016	P5	8/12/2016	APP	0	\$1,250.00		\$1,250.00	\$0.00
8/5/2016	P4	8/5/2016						
7/29/2016	P3	7/27/2016						
7/22/2016	P2A	7/20/2016						
7/15/2016	P2	7/15/2016						
7/8/2016	P1A	7/8/2016						
7/1/2016	P1	6/29/2016						
6/10/2016	M5	6/6/2016						
5/10/2016	M4	5/10/2016						
4/11/2016	M3	4/11/2016						
3/10/2016	M2	3/4/2016						
2/10/2016	M1	2/7/2016						
1/11/2016	M12	1/10/2016						
12/10/2015	M11	12/8/2015						
11/10/2015	M10	11/10/2015						
10/13/2015	M9	10/12/2015						
9/10/2015	M8	9/10/2015						
8/10/2015	M7	8/7/2015						
7/10/2015	M6	7/10/2015						
6/10/2015	M5	6/4/2015						
5/11/2015	M4	5/7/2015						
4/10/2015	M3	4/8/2015						
3/10/2015	M2	3/10/2015						
2/10/2015	M1	2/6/2015						
1/12/2015	M12	1/7/2015						

12/10/2014 M11 12/4/2014  
11/10/2014 M10 11/7/2014  
10/31/2014 G7 10/31/2014  
10/30/2014 D6 10/30/2014  
10/29/2014 D5 10/29/2014  
10/28/2014 D4 10/28/2014  
10/27/2014 D3 10/27/2014  
10/26/2014 D2 10/26/2014  
10/25/2014 D1 10/25/2014  
10/24/2014 G6 10/22/2014  
10/17/2014 G5 10/15/2014  
10/10/2014 G4 10/10/2014  
10/3/2014 G3 9/30/2014  
9/26/2014 G2A 9/26/2014  
9/19/2014 G2 9/19/2014  
9/12/2014 G1A 9/9/2014  
9/5/2014 G1 9/5/2014  
8/29/2014 P7A 8/29/2014  
8/22/2014 P7 8/22/2014  
8/15/2014 P6 8/12/2014  
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 7/16/2014  
7/11/2014 P2 7/8/2014  
7/4/2014 P1A 7/4/2014  
6/27/2014 P1 6/25/2014  
6/10/2014 M5 6/10/2014  
5/12/2014 M4 5/12/2014  
4/10/2014 M3 4/10/2014  
3/10/2014 M2 3/10/2014  
2/10/2014 M1 2/7/2014  
1/10/2014 M12 1/10/2014  
12/10/2013 M11 12/10/2013  
11/12/2013 M10 11/12/2013  
10/10/2013 Q3 10/10/2013





**Florida Department of State  
Division of Elections**

**Business Political Action Committee of Palm Beach County**

**Campaign Finance Activity**

**Note:** The information presented below was obtained from the Committee's/Candidate's Campaign Treasurer's Report filed with the Division of Elections. About the Campaign Finance Data Base. If all contributions for a reporting period are less than 1 dollar Then they may not be displayed.

	Filing Period	Contributions			Expend	Other	Transfers
		Monetary	Loans	InKind			
○	09/23/2013 - 09/30/2013	18,682.85	0.00	0.00	0.00	0.00	0.00
○	10/01/2013 - 10/31/2013	1,700.00	0.00	0.00	2,941.06	0.00	0.00
○	11/01/2013 - 11/30/2013	5,150.00	0.00	0.00	5,318.69	0.00	0.00
○	12/01/2013 - 12/31/2013	24,000.00	0.00	0.00	9,373.20	0.00	0.00
○	01/01/2014 - 01/31/2014	14,550.00	0.00	0.00	3,591.86	0.00	0.00
○	02/01/2014 - 02/28/2014	5,510.58	0.00	0.00	2,938.27	0.00	0.00
○	03/01/2014 - 03/31/2014	0.00	0.00	0.00	3,053.90	0.00	0.00
○	04/01/2014 - 04/30/2014	0.00	0.00	0.00	3,442.82	0.00	0.00
○	05/01/2014 - 05/31/2014	1,252.77	0.00	0.00	2,788.16	0.00	0.00
○	06/01/2014 - 06/20/2014	3,250.89	0.00	0.00	2,691.55	0.00	0.00
○	06/21/2014 - 06/27/2014	1,000.00	0.00	0.00	142.24	0.00	0.00
○	06/28/2014 - 07/04/2014	142.24	0.00	0.00	2,292.00	0.00	0.00
<b>W</b>	07/05/2014 - 07/11/2014	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	07/12/2014 - 07/18/2014	0.00	0.00	0.00	0.00	0.00	0.00
○	07/19/2014 - 07/25/2014	2,500.00	0.00	0.00	15,564.11	0.00	0.00
○	07/26/2014 - 08/01/2014	0.00	0.00	0.00	3,981.64	0.00	0.00

○	08/02/2014 - 08/08/2014	1,000.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	08/09/2014 - 08/21/2014	0.00	0.00	0.00	0.00	0.00	0.00
○	08/22/2014 - 08/22/2014	0.00	0.00	0.00	999.23	0.00	0.00
<b>W</b>	08/23/2014 - 08/29/2014	0.00	0.00	0.00	0.00	0.00	0.00
○	08/30/2014 - 09/05/2014	0.00	0.00	0.00	1,675.66	0.00	0.00
○	09/06/2014 - 09/12/2014	0.00	0.00	0.00	74.72	0.00	0.00
○	09/13/2014 - 09/19/2014	3,000.00	0.00	0.00	7,872.12	0.00	0.00
○	09/20/2014 - 09/26/2014	1,000.00	0.00	0.00	0.00	0.00	0.00
○	09/27/2014 - 10/03/2014	0.00	0.00	0.00	6,931.50	0.00	0.00
<b>W</b>	10/04/2014 - 10/10/2014	0.00	0.00	0.00	0.00	0.00	0.00
○	10/11/2014 - 10/17/2014	5,500.00	0.00	0.00	1,603.37	0.00	0.00
○	10/18/2014 - 10/24/2014	8,000.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	10/25/2014 - 10/25/2014	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	10/26/2014 - 10/26/2014	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	10/27/2014 - 10/27/2014	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	10/28/2014 - 10/28/2014	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	10/29/2014 - 10/29/2014	0.00	0.00	0.00	0.00	0.00	0.00
○	10/18/2014 - 10/30/2014	0.00	0.00	0.00	12,500.00	0.00	0.00
○	10/31/2014 - 10/31/2014	0.00	0.00	0.00	1,751.03	0.00	0.00
○	11/01/2014 - 11/30/2014	5,700.00	0.00	0.00	3,059.00	0.00	0.00
○	12/01/2014 - 12/31/2014	36,300.00	0.00	0.00	3,343.53	0.00	0.00
○	01/01/2015 - 01/31/2015	7,350.00	0.00	0.00	6,443.43	0.00	0.00
○	02/01/2015 - 02/28/2015	5,000.00	0.00	0.00	3,827.65	0.00	0.00
○	03/01/2015 - 03/31/2015	3,750.00	0.00	0.00	3,415.19	127.54	0.00
○	04/01/2015 -	1,100.00	0.00	0.00	3,374.51	171.71	0.00

	04/30/2015						
○	05/01/2015 - 05/31/2015	1,000.00	0.00	0.00	2,938.88	0.00	0.00
○	06/01/2015 - 06/30/2015	1,450.00	0.00	0.00	3,459.69	0.00	0.00
○	07/01/2015 - 07/31/2015	1,700.00	0.00	0.00	3,821.98	0.00	0.00
○	08/01/2015 - 08/31/2015	150.00	0.00	0.00	4,552.35	0.00	0.00
○	09/01/2015 - 09/30/2015	1,015.00	0.00	0.00	4,468.64	0.00	0.00
○	10/01/2015 - 10/31/2015	90.00	0.00	0.00	3,864.14	0.00	0.00
○	11/01/2015 - 11/30/2015	1,685.00	0.00	0.00	6,791.34	115.36	0.00
○	12/01/2015 - 12/31/2015	23,545.00	0.00	0.00	2,722.45	0.00	0.00
○	01/01/2016 - 01/31/2016	6,950.00	0.00	0.00	4,028.96	247.62	0.00
○	02/01/2016 - 02/29/2016	5,900.00	0.00	0.00	2,015.26	191.02	0.00
○	03/01/2016 - 03/31/2016	5,450.00	0.00	0.00	2,154.14	0.00	0.00
○	04/01/2016 - 04/30/2016	11,571.10	0.00	0.00	2,634.12	211.98	0.00
○	05/01/2016 - 05/31/2016	0.00	0.00	0.00	2,548.65	196.51	0.00
○	06/01/2016 - 06/24/2016	3,100.00	0.00	0.00	97.12	0.00	0.00
○	06/25/2016 - 07/01/2016	0.00	0.00	0.00	13,260.73	243.71	0.00
<b>W</b>	07/02/2016 - 07/08/2016	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	07/09/2016 - 07/15/2016	0.00	0.00	0.00	0.00	0.00	0.00
○	07/16/2016 - 07/22/2016	500.00	0.00	0.00	7,816.61	0.00	0.00
<b>W</b>	07/23/2016 - 07/29/2016	0.00	0.00	0.00	0.00	0.00	0.00
○	07/30/2016 - 08/05/2016	5,000.00	0.00	0.00	0.00	0.00	0.00
○	08/06/2016 - 08/12/2016	5,000.00	0.00	0.00	500.00	0.00	0.00
<b>W</b>	08/13/2016 - 08/25/2016	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	08/26/2016 - 08/26/2016	0.00	0.00	0.00	0.00	0.00	0.00
○	08/27/2016 - 09/02/2016	2,670.00	0.00	0.00	1,824.12	0.00	0.00

<b>W</b>	09/03/2016 - 09/09/2016	0.00	0.00	0.00	0.00	0.00	0.00
<b>○</b>	09/10/2016 - 09/16/2016	90.18	0.00	0.00	59.86	0.00	0.00
<b>W</b>	09/17/2016 - 09/23/2016	0.00	0.00	0.00	0.00	0.00	0.00
<b>○</b>	09/24/2016 - 09/30/2016	0.00	0.00	0.00	2,086.84	293.84	0.00
<b>W</b>	10/01/2016 - 10/07/2016	0.00	0.00	0.00	0.00	0.00	0.00
<b>○</b>	10/08/2016 - 10/14/2016	500.00	0.00	0.00	2,000.00	0.00	0.00
<b>W</b>	10/15/2016 - 10/21/2016	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	10/22/2016 - 10/28/2016	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	10/29/2016 - 10/29/2016	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	10/30/2016 - 10/30/2016	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	10/31/2016 - 10/31/2016	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	11/01/2016 - 11/01/2016	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	11/02/2016 - 11/02/2016	0.00	0.00	0.00	0.00	0.00	0.00
<b>○</b>	10/22/2016 - 11/03/2016	0.00	0.00	0.00	2,061.00	0.00	0.00
<b>○</b>	11/04/2016 - 11/30/2016	100.00	0.00	0.00	1,946.79	73.12	0.00
<b>○</b>	12/01/2016 - 12/31/2016	21,600.00	0.00	0.00	1,611.98	0.00	0.00
<b>●</b>	<b>All Dates (Totals)</b>	254,505.61	0.00	0.00	194,256.09	1,872.41	0.00

Note: <sup>(E)</sup> indicates that report was filed electronically

**X** Indicates that detail has not been released

**W** Indicates that a waiver was filed and **L** Indicates that a loan report was filed

Select Detail Type

Contributions ▼

Select Sort Order

Date(Ascending) ▼

Select Output Type

Display On Screen ▼

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RE: Acct #61007  
Bronson, Kristi R.  
to:  
Cedric Oliver  
01/17/2017 09:39 AM  
Hide Details  
From: "Bronson, Kristi R." <Kristi.Bronson@DOS.MyFlorida.com>  
To: Cedric Oliver <Cedric.Oliver@myfloridalegal.com>

The committee filed a notice of no activity (waiver) on 8-12-16. A waiver is not a report. On 8-29-16, the committee filed a report showing \$5000 of activity. The fine is based on 25% of the activity.

*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:** Cedric Oliver [<mailto:Cedric.Oliver@myfloridalegal.com>]  
**Sent:** Thursday, January 12, 2017 8:15 AM  
**To:** Bronson, Kristi R.  
**Subject:** Acct #61007

Kristi, Could you please explain the discrepancy for this PC's 2016 P5 Report. DOE records reflect that this report was filed on 8/12/16, which is the day that the report was due. This PC was fined \$1,250.00.

The Department of State is committed to excellence. Please take our <a href="#">Customer Satisfaction Survey</a> .
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