

STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION

In Re: Joelle Franck

Case No.: FEC 15-359

TO: Joelle Franck
181 NW 110th Street
Miami Shores, FL 33168

Stephanie Thomas
North Miami City Clerk
776 NE 125th Street
North Miami, FL 33161

NOTICE OF HEARING (INFORMAL HEARING)

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.

STATE OF FLORIDA
17 FEB 28 2017
FILED

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

**Florida Elections Commission,
Petitioner,**

Case No.: FEC 15-359

v.

**Joelle Franck,
Respondent.**

_____ /

ORDER OF PROBABLE CAUSE

THIS MATTER was heard by the Florida Elections Commission (Commission) at its regularly scheduled meeting on February 28, 2017, in Tallahassee, Florida.

On January 20, 2017, Staff recommended to the Commission that there was probable cause to believe that the Florida Election Code was violated. The facts articulated in Staff's Recommendation are adopted by reference and incorporated herein. 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 violation(s):

Count 1:

On or around May 11, 2015, Joelle Franck violated Section 106.19(1)(c), Florida Statutes, when she deliberately failed to include information required by Chapter 106, Florida Statutes, on the campaign's 2015 M4 Report.

Count 2:

On or around June 10, 2015, Joelle Franck violated Section 106.19(1)(c), Florida Statutes, when she deliberately failed to

include information required by Chapter 106, Florida Statutes, on the campaign's 2015 M5 Report.

The Commission finds that there is **no probable cause** to charge Respondent with violating Section 106.07(2)(b)1., Florida Statutes.

DONE AND ORDERED by the Florida Elections Commission on February 28, 2017.



M. Scott Thomas, Chairman
Florida Elections Commission

Copies furnished to:
Stephanie J. Cunningham, Assistant General Counsel
Joelle Franck, Respondent
Stephanie Thomas, 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: Joelle Franck

Case No.: FEC 15-359

TO: Joelle Franck
181 NW 110th Street
Miami Shores, FL 33168

Stephanie Thomas
North Miami City Clerk
776 NE 125th Street
North Miami, FL 33161

NOTICE OF HEARING (PROBABLE CAUSE DETERMINATION)

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

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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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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.

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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.

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Joelle Franck

Case No.: FEC 15-359

STAFF RECOMMENDATION FOLLOWING INVESTIGATION

Pursuant to Section 106.25(4)(c), Florida Statutes, undersigned staff counsel files this written recommendation for disposition of the sworn complaint in this case recommending that there is **probable cause** to charge Respondent with violating **Section 106.19(1)(c), Florida Statutes**, and **no probable cause** to charge Respondent with violating **Section 106.07(2)(b)1., Florida Statutes**. Based upon a thorough review of the Report of Investigation submitted on December 14, 2016, the following facts and law support this staff recommendation:

1. On December 10, 2015, the Florida Elections Commission (“Commission”) received an amendment to a sworn complaint from Stephanie Thomas, Deputy City Clerk, City of North Miami (“Complainant” or “Clerk”) alleging that Joelle Franck (“Respondent”) violated Chapter 106, Florida Statutes.

2. Respondent was the treasurer for Beverly Hilton, a 2015 candidate for North Miami City Council, District 4. (ROI Exhibit 1)¹ Respondent previously served as Ms. Hilton’s treasurer during her 2010 campaign. (ROI Exhibit 9, page 2)

3. By letter dated May 17, 2016, 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 Beverly Hilton, a 2015 candidate for the North Miami City Council, District 4, failed to timely make necessary amendments to the campaign’s 2015 M2 (covering the period February 1, 2015 - February 28, 2015) campaign treasurer report, as alleged in the complaint.

Section 106.19(1)(c), Florida Statutes: Respondent, treasurer for Beverly Hilton, a 2015 candidate for the North Miami City Council, District 4, may have falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, when she failed to file the campaign’s report covering the period March 1, 2015 through May 31, 2015, as alleged in the complaint.

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

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

4. Complainant alleged that Respondent violated Florida's election laws by falsely reporting or deliberately failing to include information required by Chapter 106, Florida Statutes, when she failed to file the campaign's 2015 M3, M4, and M5 reports.

2015 M3 Report

5. The campaign's 2015 M3 Report was due to be filed by April 10, 2015. (ROI Exhibit 11, page 6) The report was filed on the designated due date as evidenced by the Clerk's filing stamp. (ROI Exhibit 3, page 1)

6. It does not appear that Respondent falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, when she failed to file the campaign's 2015 M3 Report as the report was timely filed.

2015 M4 Report

7. The campaign's 2015 M4 Report was due to be filed by May 11, 2015. (ROI Exhibit 11, page 6) Respondent failed to file the report on the designated due date.

8. A subpoena was issued to Respondent's designated campaign depository to ascertain whether any financial activity occurred during the relevant reporting period, i.e., April 1, 2015 – April 30, 2015.

9. The campaign's bank records show monetary contributions totaling \$6,735.17 and expenditures totaling \$8,770.55 that Respondent failed to disclose when she failed to file the campaign's 2015 M4 Report. (Attachment A)

10. Respondent stated that she "thought Ms. Hilton submitted reports." (ROI Exhibit 9, page 7) As of January 19, 2017, the Clerk's website does not show that Respondent ever filed the report.

11. Respondent deliberately failed to include information required by Chapter 106, Florida Statutes, when she failed to file the campaign's 2015 M4 Report and disclose \$15,505.72 in reportable financial activity.

2015 M5 Report

12. The campaign's 2015 M5 Report was due to be filed by June 10, 2015. (ROI Exhibit 11, page 6) Respondent failed to file the report on the designated due date.

13. A subpoena was issued to Respondent's designated campaign depository to ascertain whether any financial activity occurred during the relevant reporting period, i.e., May 1, 2015 – May 31, 2015.

14. The campaign's bank records show monetary contributions totaling \$680.00 and expenditures totaling \$1,572.55 that Respondent failed to disclose when she failed to file the campaign's 2015 M5 Report. (Attachment B)

15. Respondent stated that she "assumed Ms. Hilton submitted reports." (ROI Exhibit 9, page 7) As of January 19, 2017, the Clerk's website does not show that Respondent ever filed the report.

16. Respondent deliberately failed to include information required by Chapter 106, Florida Statutes, when she failed to file the campaign's 2015 M5 Report and disclose \$2,252.55 in reportable financial activity.

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

17. Complainant alleged that Respondent violated Florida's election laws by failing to timely file the required amendments to the campaign's 2015 M2 Report within 7 days of receiving notification from her filing officer that the report was incomplete and required amendment.

18. The campaign's 2015 M2 Report was filed on March 11, 2015. (ROI Exhibit 2, page 1) The report was incomplete when filed. (ROI Exhibit 4, page 1)

19. On April 8, 2015, Beverly Hilton received an email from the Clerk notifying her that the campaign's report was incomplete. The email included information showing why the report was incomplete, i.e., failure to include addresses for contributions, expenditures, and distributions. (ROI Exhibit 4, page 1)

20. On April 20, 2015, the Clerk mailed a letter to Beverly Hilton notifying her that the campaign's report was still incomplete. (ROI Exhibit 5) The letter included information showing why the report was incomplete. A copy of the letter was emailed to Ms. Hilton on May 7, 2015. (ROI Exhibit 10, page 3)

21. On March 22, 2016, the campaign's amended 2015 M2 Report was filed. (ROI Exhibit 8, page 1) It is unclear whether the amended report corrected all of the errors in the original report.

22. Respondent stated that she did not have any contact with the Clerk's office during the campaign and that Respondent was never notified that she was required to amend the report. (ROI Exhibit 9, pages 4-5)

23. The Clerk confirmed that her office did not notify Respondent that the report was incomplete. (ROI Exhibit 10, page 1)

24. Pursuant to Section 106.07(2)(b)1., Florida Statutes, the filing officer is required to notify the campaign treasurer by certified mail or mail requiring proof of delivery as to why the report is incomplete. Thereafter, the campaign treasurer has a duty to file an addendum to an

incomplete report within seven days after receiving notice from its filing officer. This section of law is clear that the “Failure to file a complete report after such notice constitutes a violation of this chapter.”

25. Although the candidate, Beverly Hilton received notice of the campaign’s incomplete report, Respondent was not notified pursuant to the statute. Therefore, Respondent did not violate Florida’s election laws when she failed to timely file an addendum to the campaign’s 2015 M2 Report because the Clerk’s notification to Respondent was a condition precedent that was not met.

26. “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).

27. The facts set forth above show that Respondent was the treasurer for Beverly Hilton, a 2015 candidate for North Miami City Council, District 4. Respondent deliberately failed to include information required by Chapter 106, Florida Statutes, when she failed to file the campaign’s 2015 M4 Report and disclose \$15,505.72 in reportable financial activity. Respondent deliberately failed to include information required by Chapter 106, Florida Statutes, when she failed to file the campaign’s 2015 M5 Report and disclose \$2,252.55 in reportable financial activity. It does not appear that Respondent falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, when she failed to file the campaign’s 2015 M3 Report as the report was timely filed. Respondent did not violate Florida’s election laws when she failed to timely file an addendum to the campaign’s 2015 M2 Report because the Clerk’s notification to Respondent was a condition precedent that was not met.

Based upon these facts and circumstances, I recommend that the Commission find **no probable cause** that Respondent violated **Section 106.07(2)(b)1., Florida Statutes**, and find **probable cause** to charge Respondent with violating the following:

Count 1:

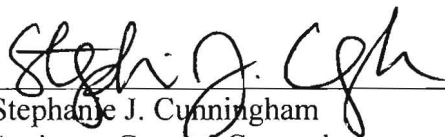
On or around May 11, 2015, Joelle Franck violated Section 106.19(1)(c), Florida Statutes, when she deliberately failed to include information required by Chapter 106, Florida Statutes, on the campaign’s 2015 M4 Report.

Count 2:

On or around June 10, 2015, Joelle Franck violated Section 106.19(1)(c), Florida Statutes, when she deliberately failed to

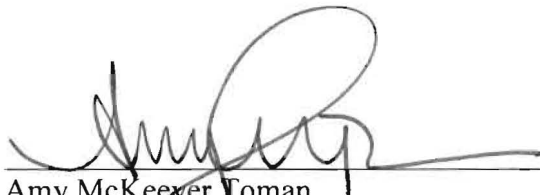
include information required by Chapter 106, Florida Statutes, on the campaign's 2015 M5 Report.

Respectfully submitted on January 20, 2017.



Stephanie J. Cunningham
Assistant General Counsel

I reviewed this Staff Recommendation this 20th day of January 2017.



Amy McKeever Toman
Executive Director



P.O. Box 15284
Wilmington, DE 19850

BEVERLY HILTON
CAMPAIGN ACCOUNT
12495 NW 6TH AVE
NORTH MIAMI, FL 33168-3611

Customer service information

- 1.888.BUSINESS (1.888.287.4637)
- bankofamerica.com
- Bank of America, N.A.
P.O. Box 25118
Tampa, FL 33622-5118

Your Business Fundamentals Checking

for April 1, 2015 to April 30, 2015

BEVERLY HILTON CAMPAIGN ACCOUNT

Account number: XXXXXXXXXX

Account summary

Beginning balance on April 1, 2015	\$2,689.10
Deposits and other credits	6,735.17
Withdrawals and other debits	-2,631.52
Checks	-6,104.03
Service fees	-35.00
Ending balance on April 30, 2015	\$653.72

- # of deposits/credits: 19
- # of withdrawals/debits: 45
- # of items-previous cycle¹: 22
- # of days in cycle: 30
- Average ledger balance: \$979.68
- ¹Includes checks paid, deposited items & other debits

Three simple words:

More cash back

1%
cash back on
purchases

2%
cash back at
restaurants

3% cash back at
gas stations and
office supply stores*

Plus get a \$100 statement credit.**

Apply for the **NO ANNUAL FEE**
Cash Rewards for Business credit card.
Call **888.600.4000**, or go to
bankofamerica.com/bizstmt today.

*Earn 1% cash back on purchases, 2% on purchases at restaurants and 3% on purchases at gas stations and office supply stores. (Up to \$250,000 in gas station and office supply store purchases annually; 1% after that.) Subject to Cash Rewards Program rules. Program is subject to change. See application for more details. **To qualify for the statement credit, you must make at least \$500 in retail purchases with your card that post to your account within 60 days from account opening. The credit will be applied to the company's business card account. One \$100 statement credit allowed per company. Please allow 10-12 weeks after the qualifying transaction posts to your account to receive your statement credit. AR3MS9XD | SSM-01-15-8289.D

Attachment A

IMPORTANT INFORMATION: BANK DEPOSIT ACCOUNTS

Updating your contact information - We encourage you to keep your contact information up-to-date. This includes address, email and phone number. If your information has changed, the easiest way to update it is by visiting the Help & Support tab of Online Banking. Or, you can call our Customer Service team.

Deposit agreement - When you opened your account, you received a deposit agreement and fee schedule and agreed that your account would be governed by the terms of these documents, as we may amend them from time to time. These documents are part of the contract for your deposit account and govern all transactions relating to your account, including all deposits and withdrawals. Copies of both the deposit agreement and fee schedule which contain the current version of the terms and conditions of your account relationship may be obtained at our banking centers.

Electronic transfers: In case of errors or questions about your electronic transfers- If you think your statement or receipt is wrong or you need more information about an electronic transfer (e.g., ATM transactions, direct deposits or withdrawals, point-of-sale transactions) on the statement or receipt, telephone or write us at the address and number listed on the front of this statement as soon as you can. We must hear from you no later than 60 days after we sent you the FIRST statement on which the error or problem appeared.

- Tell us your name and account number.
- Describe the error or transfer you are unsure about, and explain as clearly as you can why you believe there is an error or why you need more information.
- Tell us the dollar amount of the suspected error.

For consumer accounts used primarily for personal, family or household purposes, we will investigate your complaint and will correct any error promptly. If we take more than 10 business days (10 calendar days if you are a Massachusetts customer) (20 business days if you are a new customer, for electronic transfers occurring during the first 30 days after the first deposit is made to your account) to do this, we will credit your account for the amount you think is in error, so that you will have use of the money during the time it will take to complete our investigation.

For other accounts, we investigate, and if we find we have made an error, we credit your account at the conclusion of our investigation.

Reporting other problems - You must examine your statement carefully and promptly. You are in the best position to discover errors and unauthorized transactions on your account. If you fail to notify us in writing of suspected problems or an unauthorized transaction within the time period specified in the deposit agreement (which periods are no more than 60 days after we make the statement available to you and in some cases are 30 days or less), we are not liable to you for, and you agree to not make a claim against us for the problems or unauthorized transactions.

Direct deposits - If you have arranged to have direct deposits made to your account at least once every 60 days from the same person or company, you may call us at the telephone number listed on the front of this statement to find out if the deposit was made as scheduled. You may also review your activity online or visit a banking center for information.

© 2015 Bank of America Corporation

Bank of America, N.A. Member FDIC and  Equal Housing Lender

Deposits and other credits

Date	Description	Amount
04/01/15	BKOFAMERICA ATM 04/01 #000001917 DEPOSIT SHORES VILLAGE MIAMI SHORES FL	500.00
04/02/15	BKOFAMERICA ATM 04/02 #000007795 DEPOSIT NORTH MIAMI NORTH MIAMI FL	700.00
04/02/15	BKOFAMERICA ATM 04/02 #000003033 DEPOSIT WEST DIXIE N MIAMI FL	200.00
04/02/15	BKOFAMERICA ATM 04/02 #000003030 DEPOSIT WEST DIXIE N MIAMI FL	200.00
04/03/15	BKOFAMERICA ATM 04/03 #000007955 DEPOSIT SHORES VILLAGE MIAMI SHORES FL	400.00
04/08/15	BKOFAMERICA ATM 04/08 #000005002 DEPOSIT NORTH MIAMI NORTH MIAMI FL	500.00
04/10/15	BKOFAMERICA ATM 04/10 #000006065 DEPOSIT NORTH MIAMI NORTH MIAMI FL	250.00
04/10/15	PAYPAL DES:VERIFYBANK ID:205AFJ222GPTRJG INDN:BEVERLY HILTON CAMPAIG CO ID:PAYPALRD33 PPD	0.16
04/10/15	PAYPAL DES:VERIFYBANK ID:105AFJ222GPTRJG INDN:BEVERLY HILTON CAMPAIG CO ID:PAYPALRD33 PPD	0.01
04/17/15	BKOFAMERICA ATM 04/17 #000006963 DEPOSIT NORTH MIAMI NORTH MIAMI FL	1,050.00
04/20/15	BKOFAMERICA ATM 04/20 #000009462 DEPOSIT NORLAND MIAMI FL	1,000.00
04/20/15	BKOFAMERICA ATM 04/18 #000002238 DEPOSIT WEST DIXIE N MIAMI FL	250.00
04/20/15	BKOFAMERICA ATM 04/20 #000009918 DEPOSIT SHORES VILLAGE MIAMI SHORES FL	90.00
04/20/15	BKOFAMERICA ATM 04/20 #000009920 DEPOSIT SHORES VILLAGE MIAMI SHORES FL	60.00
04/24/15	BKOFAMERICA ATM 04/24 #000005152 DEPOSIT WEST DIXIE N MIAMI FL	250.00
04/27/15	BKOFAMERICA ATM 04/25 #000003807 DEPOSIT NORTH MIAMI NORTH MIAMI FL	170.00
04/27/15	BKOFAMERICA ATM 04/27 #000002373 DEPOSIT SHORES VILLAGE MIAMI SHORES FL	90.00
04/27/15	BKOFAMERICA ATM 04/25 #000003803 DEPOSIT NORTH MIAMI NORTH MIAMI FL	25.00
04/29/15	BKOFAMERICA ATM 04/29 #000008909 DEPOSIT WEST DIXIE N MIAMI FL	1,000.00
Total deposits and other credits		\$6,735.17

Withdrawals and other debits

Date	Description	Amount
------	-------------	--------

continued on the next page

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- **Bank of America Small Business Community** — share insights with other business owners

Withdrawals and other debits - continued

Date	Description	Amount
04/10/15	PAYPAL DES:VERIFYBANK ID:405AFJ222GPTRJG INDN:BEVERLY HILTON CAMPAIG CO ID:PAYPALRD33 PPD	-0.17
Card account # XXXX XXXX XXXX 2211		
04/02/15	CHECKCARD 0402 WEB*.COM 800-311-2707 FL 55432865092000672273742 CKCD 5968 XXXXXXXXXXXX2211 XXXX XXXX XXXX 2211	-55.00
04/02/15	SEDANO'S #16 04/02 #000500731 PURCHASE 3925 PALM AVE. HIALEAH FL	-161.00
04/02/15	COSTCO GAS #01 04/02 #000242868 PURCHASE COSTCO GAS #018 N. MIAMI BEAC FL	-40.10
04/03/15	CHECKCARD 0403 WEB*.COM 800-311-2707 FL 55432865093000171682657 CKCD 5968 XXXXXXXXXXXX2211 XXXX XXXX XXXX 2211	-114.95
04/10/15	CHECKCARD 0409 LITTLE CAESARS 22 NORTH MIAMI FL 05436845100000147787402 CKCD 5814 XXXXXXXXXXXX2211 XXXX XXXX XXXX 2211	-24.61
04/10/15	BKOFAMERICA ATM 04/10 #000003376 WITHDRWL NORTH MIAMI NORTH MIAMI FL	-500.00
04/13/15	CHECKCARD 0411 SUNSHINE 170 MIAMI FL 55541865102004122094506 CKCD 5542 XXXXXXXXXXXX2211 XXXX XXXX XXXX 2211	-30.10
04/13/15	CHECKCARD 0411 WENDYS #1721 MIAMI FL 05436845102500061130420 CKCD 5814 XXXXXXXXXXXX2211 XXXX XXXX XXXX 2211	-38.90
04/13/15	BKOFAMERICA ATM 04/11 #000004225 WITHDRWL NORTH MIAMI NORTH MIAMI FL	-500.00
04/15/15	COSTCO WHSE #0 04/15 #000796427 PURCHASE COSTCO WHSE #01 NORTH MIAMI FL	-33.32
04/16/15	BKOFAMERICA ATM 04/16 #000001216 WITHDRWL WEST DIXIE N MIAMI FL	-20.00
04/20/15	BKOFAMERICA ATM 04/18 #000002239 WITHDRWL WEST DIXIE N MIAMI FL	-20.00
04/20/15	CHECKCARD 0418 SUNSHINE 170 MIAMI FL 55541865109004122492745 CKCD 5542 XXXXXXXXXXXX2211 XXXX XXXX XXXX 2211	-40.00
04/20/15	BKOFAMERICA ATM 04/18 #000009531 WITHDRWL SHORES VILLAGE MIAMI SHORES FL	-100.00
04/20/15	WAL Wal-Mart S 04/19 #000721328 PURCHASE 3397 WAL-SAMS MIAMI GARDENS FL	-48.78
04/21/15	WM SUPERCENTER 04/20 #000555535 PURCHASE Wal-Mart Super Ce MIAMI GARDENS FL	-29.42
04/23/15	COSTCO WHSE #0 04/23 #000454099 PURCHASE COSTCO WHSE #01 NORTH MIAMI FL	-74.25
04/24/15	CHECKCARD 0423 LITTLE CAESARS 22 NORTH MIAMI FL 05436845114000147719508 CKCD 5814 XXXXXXXXXXXX2211 XXXX XXXX XXXX 2211	-19.82
04/24/15	BKOFAMERICA ATM 04/24 #000002272 WITHDRWL SHORES VILLAGE MIAMI SHORES FL	-20.00
04/24/15	COSTCO WHSE #0 04/24 #000582844 PURCHASE COSTCO WHSE #01 NORTH MIAMI FL	-54.62
04/24/15	COSTCO GAS #01 04/24 #000591427 PURCHASE COSTCO GAS #018 N. MIAMI BEAC FL	-38.00
04/27/15	CHECKCARD 0425 COMCAST CABLE COM 800-COMCAST FL 55432865115000290786565 CKCD 4899 XXXXXXXXXXXX2211 XXXX XXXX XXXX 2211	-84.35
04/27/15	CHECKCARD 0424 LITTLE CAESARS 22 MIAMI SHORES FL 05436845115000156772637 CKCD 5814 XXXXXXXXXXXX2211 XXXX XXXX XXXX 2211	-52.43
04/27/15	CHECKCARD 0425 SUNSHINE 170 MIAMI FL 55541865116004098325169 CKCD 5542 XXXXXXXXXXXX2211 XXXX XXXX XXXX 2211	-48.00
04/27/15	THE HOME DEPOT 04/25 #000472001 PURCHASE THE HOME DEPOT #6 MIAMI FL	-24.01
04/27/15	WINN-DIXIE # 04/27 #000579315 PURCHASE 11030 NW 7TH AVE MIAMI FL	-16.68
04/27/15	COSTCO WHSE #0 04/27 #000954961 PURCHASE COSTCO WHSE #01 NORTH MIAMI FL	-109.31
04/28/15	CHECKCARD 0426 NEW RANDY'S RESTA NORTH MIAMI FL 85180895117980163395196 CKCD 5812 XXXXXXXXXXXX2211 XXXX XXXX XXXX 2211	-48.15
04/30/15	CHECKCARD 0430 WEB*.COM 800-311-2707 FL 55432865120000765328896 CKCD 5968 XXXXXXXXXXXX2211 XXXX XXXX XXXX 2211	-55.00
04/30/15	BKOFAMERICA ATM 04/30 #000004266 WITHDRWL SHORES VILLAGE MIAMI SHORES FL	-160.00
04/30/15	COSTCO GAS #01 04/30 #000371043 PURCHASE COSTCO GAS #018 N. MIAMI BEAC FL	-30.07
04/30/15	COSTCO WHSE #0 04/30 #000385706 PURCHASE COSTCO WHSE #01 NORTH MIAMI FL	-40.48
Subtotal for card account # XXXX XXXX XXXX 2211		-\$2,631.35
Total withdrawals and other debits		-\$2,631.52

Checks

Date	Check #	Amount
04/01/15	1001	-60.00
04/06/15	1007*	-100.00
04/07/15	1008	-1,800.00
04/20/15	1009	-360.00
04/03/15	1010	-1,901.93
04/20/15	1011	-673.10

Date	Check #	Amount
04/20/15	1012	-300.00
04/21/15	1013	-500.00
04/28/15	1014	-175.00
04/27/15	1015	-214.00
04/01/15	1026*	-20.00

Total checks -**\$6,104.03**
Total # of checks **11**

* There is a gap in sequential check numbers

Service fees

Your Overdraft and NSF: Returned Item fees for this statement period and year to date are shown below.

	Total for this period	Total year-to-date
Total Overdraft fees	\$35.00	\$35.00
Total NSF: Returned Item fees	\$0.00	\$0.00

Based upon the activity below, the monthly fee on your Business Fundamentals checking account was waived for the statement period ending 03/31/15:

At least one of the following occurred

- \$250+ in net new purchases on a linked Business debit card
- \$250+ in net new purchases on a linked Business credit card
- \$3,000+ minimum daily balance in primary checking account
- \$5,000+ average monthly balance in primary checking account
- \$15,000+ combined average monthly balance in linked business accounts

A check mark indicates that you have qualified for a monthly fee waiver on the account based on your usage of these products or services. For information on how to open a new product or to link an existing service to your account please call 1-888-BUSINESS or visit bankofamerica.com/smallbusiness.

Date	Transaction description	Amount
04/28/15	OVERDRAFT ITEM FEE FOR ACTIVITY OF 04-28	-35.00

Total service fees -**\$35.00**

Note your Ending Balance already reflects*the subtraction of Service Fees.

Daily ledger balances

Date	Balance (\$)	Date	Balance(\$)	Date	Balance (\$)
04/01	3,109.10	04/13	92.51	04/23	343.64
04/02	3,953.00	04/15	59.19	04/24	461.20
04/03	2,336.12	04/16	39.19	04/27	197.42
04/06	2,236.12	04/17	1,089.19	04/28	-60.73
04/07	436.12	04/20	947.31	04/29	939.27
04/08	936.12	04/21	417.89	04/30	653.72
04/10	661.51				

✓ To help you BALANCE YOUR CHECKING ACCOUNT, visit bankofamerica.com/statementbalance or the Statements and Documents tab in Online Banking for a printable version of the How to Balance Your Account Worksheet.



P.O. Box 15284
Wilmington, DE 19850

BEVERLY HILTON
CAMPAIGN ACCOUNT
12495 NW 6TH AVE
NORTH MIAMI, FL 33168-3611

Customer service information

- 1.888.BUSINESS (1.888.287.4637)
- bankofamerica.com
- Bank of America, N.A.
P.O. Box 25118
Tampa, FL 33622-5118

Please see the Account Changes section of your statement for details regarding important changes to your account.

Your Business Fundamentals Checking

for May 1, 2015 to May 31, 2015

Account number: [REDACTED]

BEVERLY HILTON CAMPAIGN ACCOUNT

Account summary

Beginning balance on May 1, 2015	\$653.72
Deposits and other credits	680.00
Withdrawals and other debits	-860.14
Checks	-607.41
Service fees	-105.00
Ending balance on May 31, 2015	-\$238.83

- # of deposits/credits: 6
- # of withdrawals/debits: 16
- # of items-previous cycle¹: 25
- # of days in cycle: 31
- Average ledger balance: \$62.56
- ¹Includes checks paid, deposited items & other debits

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Attachment B

IMPORTANT INFORMATION: BANK DEPOSIT ACCOUNTS

Updating your contact information - We encourage you to keep your contact information up-to-date. This includes address, email and phone number. If your information has changed, the easiest way to update it is by visiting the Help & Support tab of Online Banking. Or, you can call our Customer Service team.

Deposit agreement - When you opened your account, you received a deposit agreement and fee schedule and agreed that your account would be governed by the terms of these documents, as we may amend them from time to time. These documents are part of the contract for your deposit account and govern all transactions relating to your account, including all deposits and withdrawals. Copies of both the deposit agreement and fee schedule which contain the current version of the terms and conditions of your account relationship may be obtained at our banking centers.

Electronic transfers: In case of errors or questions about your electronic transfers- If you think your statement or receipt is wrong or you need more information about an electronic transfer (e.g., ATM transactions, direct deposits or withdrawals, point-of-sale transactions) on the statement or receipt, telephone or write us at the address and number listed on the front of this statement as soon as you can. We must hear from you no later than 60 days after we sent you the FIRST statement on which the error or problem appeared.

- Tell us your name and account number.
- Describe the error or transfer you are unsure about, and explain as clearly as you can why you believe there is an error or why you need more information.
- Tell us the dollar amount of the suspected error.

For consumer accounts used primarily for personal, family or household purposes, we will investigate your complaint and will correct any error promptly. If we take more than 10 business days (10 calendar days if you are a Massachusetts customer) (20 business days if you are a new customer, for electronic transfers occurring during the first 30 days after the first deposit is made to your account) to do this, we will credit your account for the amount you think is in error, so that you will have use of the money during the time it will take to complete our investigation.

For other accounts, we investigate, and if we find we have made an error, we credit your account at the conclusion of our investigation.

Reporting other problems - You must examine your statement carefully and promptly. You are in the best position to discover errors and unauthorized transactions on your account. If you fail to notify us in writing of suspected problems or an unauthorized transaction within the time period specified in the deposit agreement (which periods are no more than 60 days after we make the statement available to you and in some cases are 30 days or less), we are not liable to you for, and you agree to not make a claim against us for the problems or unauthorized transactions.

Direct deposits - If you have arranged to have direct deposits made to your account at least once every 60 days from the same person or company, you may call us at the telephone number listed on the front of this statement to find out if the deposit was made as scheduled. You may also review your activity online or visit a banking center for information.

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Deposits and other credits

Date	Description	Amount
05/04/15	BKOFAMERICA ATM 05/04 #000002752 DEPOSIT WEST DIXIE N MIAMI FL	60.00
05/04/15	BKOFAMERICA ATM 05/03 #000002014 DEPOSIT WEST DIXIE N MIAMI FL	50.00
05/04/15	BKOFAMERICA ATM 05/03 #000002017 DEPOSIT WEST DIXIE N MIAMI FL	40.00
05/04/15	BKOFAMERICA ATM 05/04 #000002477 DEPOSIT WEST DIXIE N MIAMI FL	30.00
05/05/15	BKOFAMERICA ATM 05/05 #000006206 DEPOSIT NORTH MIAMI BEAC NORTH MIAMI B FL	250.00
05/07/15	BKOFAMERICA ATM 05/07 #000002525 DEPOSIT WEST DIXIE N MIAMI FL	250.00
Total deposits and other credits		\$680.00

Withdrawals and other debits

Date	Description	Amount
Card account # XXXX XXXX XXXX 2211		
05/01/15	CHECKCARD 0430 SUNBIZ.ORG / FL, TALLAHASSEE FL 05140485120720041597411 CKCD 9399 XXXXXXXXXXXXX2211 XXXX XXXX XXXX 2211	-158.75
05/01/15	CHECKCARD 0430 SUNBIZ.ORG / FL, TALLAHASSEE FL 05140485120720041567893 CKCD 9399 XXXXXXXXXXXXX2211 XXXX XXXX XXXX 2211	-70.00
05/01/15	CHECKCARD 0501 WEB*.COM 800-311-2707 FL 55432865121000251201887 CKCD 5968 XXXXXXXXXXXXX2211 XXXX XXXX XXXX 2211	-114.95
05/04/15	CHECKCARD 0430 CHEF CREOLE #05 MIAMI FL 85180895121980152117951 CKCD 5812 XXXXXXXXXXXXX2211 XXXX XXXX XXXX 2211	-20.50
05/11/15	BKOFAMERICA ATM 05/09 #000008642 WITHDRWL NORTH MIAMI NORTH MIAMI FL	-100.00
05/11/15	BKOFAMERICA ATM 05/09 #000001265 WITHDRWL NORTH MIAMI NORTH MIAMI FL	-200.00
05/18/15	BKOFAMERICA ATM 05/17 #000001990 WITHDRWL SHORES VILLAGE MIAMI SHORES FL	-20.00
05/28/15	CHECKCARD 0526 ATS TOLLING 85584 CARROLLTON TX 55420365147630164327430 CKCD 4784 XXXXXXXXXXXXX2211 XXXX XXXX XXXX 2211	-5.99
05/28/15	CHECKCARD 0528 WEB*.COM 800-311-2707 FL 55432865148000164094931 CKCD 5968 XXXXXXXXXXXXX2211 XXXX XXXX XXXX 2211	-55.00
05/29/15	CHECKCARD 0529 WEB*.COM 800-311-2707 FL 55432865149000674786140 CKCD 5968 XXXXXXXXXXXXX2211 XXXX XXXX XXXX 2211	-114.95
Subtotal for card account # XXXX XXXX XXXX 2211		-\$860.14
Total withdrawals and other debits		-\$860.14

Accept card payments and access funds
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¹ After deposit of transactions and only when you direct payment of your settlement funds to a Bank of America business checking account. Valid only on Visa®, MasterCard® and Discover® transactions. Exceptions may apply. © 2015 Banc of America Merchant Services, LLC. All rights reserved. All trademarks, service marks and trade names referenced in this material are the property of and licensed by their respective owners. Merchant Services are provided by Bank of America, N.A. and its representative Banc of America Merchant Services, LLC. Banc of America Merchant Services, LLC is not a bank, does not offer bank deposits, and its services are not guaranteed or insured by the FDIC or any other governmental agency. AR5QY4JW | SSM-01-15-8288 B



Checks

Date	Check #	Amount
05/01/15	1016	-317.28
05/08/15	1017	-250.00

Date	Check #	Amount
05/12/15	1019*	-40.13

Total checks		-\$607.41
Total # of checks		3

* There is a gap in sequential check numbers

Service fees

Your Overdraft and NSF: Returned Item fees for this statement period and year to date are shown below.

	Total for this period	Total year-to-date
Total Overdraft fees	\$105.00	\$140.00
Total NSF: Returned Item fees	\$0.00	\$0.00

To help you avoid overdraft fees and returned items you can set up:

Alerts: receive email or text messages to inform you when your balance is low.

Overdraft Protection: automatically transfer available funds to your account from a linked savings, credit card or an eligible second checking account to help cover items that would overdraw your account.

Simply go to Online Banking at bankofamerica.com, call us at the number listed on this statement or come in to see us at your banking center.

Based upon the activity below, the monthly fee on your Business Fundamentals checking account was waived for the statement period ending 04/30/15:

At least one of the following occurred

- \$250+ in net new purchases on a linked Business debit card
- \$250+ in net new purchases on a linked Business credit card
- \$3,000+ minimum daily balance in primary checking account
- \$5,000+ average monthly balance in primary checking account
- \$15,000+ combined average monthly balance in linked business accounts

A check mark indicates that you have qualified for a monthly fee waiver on the account based on your usage of these products or services. For information on how to open a new product or to link an existing service to your account please call 1-888-BUSINESS or visit bankofamerica.com/smallbusiness.

Date	Transaction description	Amount
05/01/15	OVERDRAFT ITEM FEE FOR ACTIVITY OF 05-01	-35.00
05/28/15	OVERDRAFT ITEM FEE FOR ACTIVITY OF 05-28	-35.00
05/29/15	OVERDRAFT ITEM FEE FOR ACTIVITY OF 05-29	-35.00
Total service fees		-\$105.00

Note your Ending Balance already reflects the subtraction of Service Fees.

Daily ledger balances

Date	Balance (\$)	Date	Balance(\$)	Date	Balance (\$)
05/01	-42.26	05/08	367.24	05/18	7.11
05/04	117.24	05/11	67.24	05/28	-88.88
05/05	367.24	05/12	27.11	05/29	-238.83
05/07	617.24				

✓ To help you BALANCE YOUR CHECKING ACCOUNT, visit bankofamerica.com/statementbalance or the Statements and Documents tab in Online Banking for a printable version of the How to Balance Your Account Worksheet.

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Account Changes

At Bank of America, we're committed to keeping you up-to-date on any changes that may impact your banking accounts.

We want to keep you informed about important changes coming to your checking account starting July 6, 2015.

Today when you use your debit card to pay for a purchase, the merchant asks us to authorize a transaction amount. We typically place a hold on your account for the transaction amount authorized, which reduces the available balance in your account. For some travel related transactions, holds are not placed because the merchant's request is an estimate. However, starting July 6, 2015, when you use your debit card to pay for a purchase, we will place a hold on your account for the full amount requested by the merchant, even if the amount requested is an estimate, and reduce your available balance by the amount requested.

If the request authorization appears to be an estimate, the transaction detail for your account in Online Banking may show, "Amount may change – waiting for final amount from merchant." If the final transaction amount ends up being different than the amount we authorized, your account balance will be adjusted when we receive the final transaction amount.

We're pleased to serve your financial needs. If you have any questions regarding this change, please call the number listed on this statement or visit bankofamerica.com/locator to find a banking center nearest you.

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FLORIDA ELECTIONS COMMISSION
REPORT OF INVESTIGATION
Case No.: FEC 15-359

Respondent: Joelle Franck
Counsel for Respondent: None

Complainant: Stephanie Thomas
Counsel for Complainant: None

On May 26, 2015,¹ the Florida Elections Commission received a sworn complaint alleging that Respondent violated Chapters 106, Florida Statutes. Commission staff investigated whether Respondent violated the following statutes:

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

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.

I. Preliminary Information:

1. Respondent was campaign treasurer for Beverly Hilton, a 2015 candidate for the North Miami City Council, District 4. Ms. Hilton finished fourth out of five candidates in the May 12, 2015 municipal election.² Alix Desulme defeated Carline Paul in the June 2, 2015 run-off election.

2. On February 4, 2015, the Appointment of Campaign Treasurer and Designation of Campaign Depository for Candidates form (“DS-DE 9”) identifying Respondent as campaign treasurer was filed in the offices of the North Miami City Clerk (“FO”). To review Respondent’s DS-DE 9 form, refer to Exhibit 1.

3. The Honorable Michael A. Etienne, Jr., Esquire, is the North Miami City Clerk.³

¹ Complainant identified the candidate, Beverly Hilton, in her complaint and Ms. Hilton was notified of the pending complaint by Commission staff; however, on December 10, 2015, Complainant identified the campaign treasurer in her amended complaint.

² All candidates in North Miami municipal elections must win by a 50% plus 1 margin.

³ According to the North Miami City Clerk’s website under the heading “**Information from the Florida Department of State Division of Election regarding reports:**” effective November 1, 2013, a new law amends sections 106.07 and 106.0703, Florida Statutes, “to provide that any candidate, political committee or ECO not filing with the Division must file monthly reports.” And reviewing campaign treasurer reports filed by other candidates including the city clerk posted to the website, it appears 2015 municipal candidates were required to file monthly reports including the Termination Report.

4. Complainant is the North Miami Deputy City Clerk.

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

5. I investigated whether Respondent violated this section of the elections laws by not filing *timely* amendments to the 2015 M2 Report after receiving notice that the report was incomplete. To review the 2015 M2 Report, refer to Exhibit 2.

6. Complainant alleges that Respondent failed to make timely amendments to the campaign's 2015 M2 Report; however, she attached a copy of the 2015 M3 Report for our review. Complainant also attached an e-mail and letter addressed to 2015 municipal candidate Beverly Hilton in reference to Hilton amending her 2015 M2 Report. To review the 2015 M3 Report, refer to Exhibit 3. To review the FO's e-mail to Ms. Hilton, refer to Exhibit 4. To review the FO's letter to Ms. Hilton, refer to Exhibit 5. To review the returned envelope, refer to Exhibit 6. To review the "green card," refer to Exhibit 7.

7. The following table discusses the timeline of events regarding when Respondent amended the 2015 M2 Report, covering the reporting period of February 1 through 28, 2015. (Note: the itemized contributions page 1 of 2, identifies the 2015 M2 Report cover period as February 1, 2015 through March 9, 2015, and includes an entry dated "3/9/15"; the itemized expenditures page identifies the report cover period of February 1, 2015 through March 9, 2015, and includes entries dated "3/3/15" and "03/8/15.") To view copies of the reports and other relevant documents, refer to Exhibits 2 through 8.

TABLE 1: TIME LINE OF EVENTS		
Date	Event	Comment
04/08/15	The FO e-mailed the <u>candidate</u> notice that several campaign treasurer reports were incomplete. The FO noted itemized expenditure, contribution and distribution report sections were incomplete, and the 2015 M2 Report needed "complete addresses for all names provided." (Exhibit 4.)	No timeline given when the amendment was due.
04/20/15	The FO mailed the <u>candidate</u> notice with delivery confirmation that no updates were made to the "Campaign Treasurer's Report Summary" and the "reporting will be considered 'incomplete' with possible consequences thereafter." (Exhibits 5 through 7.)	Amendment due April 25, 2015 at Noon—less than 7 days after notice. Based upon the certified mail article number provided on the notice letter, delivery confirmation indicates notice delivered on April 11, 2015—prior to the date of the

		notice. ⁴
12/26/15	Respondent received notice of the instant complaint	
03/22/16	2015 M2 Report Amendment filed. (Exhibit 8.)	

8. Respondent affirmed she was “never informed by Clerk’s office” that she was required to amend the campaign treasurer report (“CTR”) covering the period of February 1, 2015 to February 28, 2015 to include complete addresses. To review Respondent’s sworn affidavit-questionnaire, refer to Exhibit 9, question numbers 24 and 28.

9. As confirmed by e-mail from Ms. Thomas, it appears Respondent was never notified by the filing officer she was required to amend the 2015 M2 Report to include complete addresses. To review the e-mail, refer to Exhibit 10. To review the Affidavit of Filing Officer, refer to Exhibit 11, question number 11.

10. I found no record of previous complaints to indicate that Respondent has violated this section of Florida’s election laws.

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

11. I investigated whether Respondent violated this section of the election laws by failing to file CTRs covering the period of March 1 through May 31, 2015.

12. Complainant alleges that Respondent did not file CTRs “for the period of May 10 or 11, covering the periods of April 4, through May 30th 2015.” (Note: the complaint narrative did not specifically reference the report covering the period March 1, 2015 through March 31, 2015 (2015 M3 Report). However, included as an attachment to the complaint is a copy of the campaign’s 2015 M3 Report, indicating Complainant’s apparent intent to include that report in the complaint. In her letter of legal sufficiency, the Executive Director, Ms. Toman, indicated Commission staff will investigate this report, as well as the 2015 M4 and M5 Reports, which together cover the time period between April 1 and May 31, 2015.)

A. 2015 M3 Report -- Reporting Period March 1 through 31, 2015

13. The 2015 M3 Report was filed with the filing officer on April 10, 2015, according to the date-stamp in the upper right-hand corner of the Summary Page. Respondent certified the 2015 M3 Report is true, correct and complete.

14. It appears Complainant marked several entries on the itemized contributions and distributions pages of the 2015 M3 Report using yellow highlighter that was submitted with the instant complaint. Specifically, sequence numbers 4, 5, 6, 7 and 9, and both entries on the itemized distributions page were marked appearing to indicate addresses were needed. (Note: relevant

⁴ A copy of the certified mail envelope and “green card” were included with the instant complaint, and identified a different certified mail article number than that indicated on the notice letter. The envelope indicates it was mailed to Ms. Beverly Hilton, the candidate, and returned to the sender, the municipal filing officer, and marked, “RETURN TO SENDER NO SUCH NUMBER UNABLE TO FORWARD.” Therefore, it appears the notice letter was not provided to Respondent with delivery by certified mail.

sequence numbers marked by Complainant with yellow highlighter do not appear on subsequent copies made by Commission staff; and there was no sequence number 8 provided on the itemized contributions pages of the 2015 M3 Report.) To review the 2015 M3 Report, refer to Exhibit 3.

15. By sworn affidavit-questionnaire, Respondent affirmed, "This was corrected and submitted to the City Clerk's office in 04/2016"[sic] To review her sworn affidavit, refer to Exhibit 9, question number 28.

16. However, it appears Respondent is mistaken since the 2015 M3 Report was not amended and filed with the filing officer as affirmed by staff by e-mail on December 14, 2016. To review the e-mail from the city clerk's office, refer to Exhibit 12.

17. It appears no notices were provided to Respondent by the filing officer regarding her failure to amend 2015 municipal candidate Beverly Hilton's 2015 M3 Report. To review Ms. Thomas' e-mail dated October 4, 2016, refer to Exhibit 10. To review the Affidavit of Filing Officer, refer to Exhibit 11.

B. 2015 M4 Report -- Reporting Period April 1 through 30, 2015

18. The 2015 M4 Report was due on May 11, 2015; however, no report was filed with the filing officer. (Note: the regular due date was May 10, 2015; however, because May 10, 2015 fell on Sunday, the due date was the following Monday, May 11, 2015.)

19. It appears no notices were provided to Respondent by her filing officer regarding her failure to file 2015 municipal candidate Beverly Hilton's 2015 M4 Report. To review Ms. Thomas' e-mail dated October 4, 2016, refer to Exhibit 10. To review the Affidavit of Filing Officer, refer to Exhibit 11.

20. By sworn affidavit-questionnaire, Respondent affirmed, "Never informed this needed to be amended." To review her sworn affidavit, refer to Exhibit 9, question number 28.

C. 2015 M5 Report -- Reporting Period May 1 through 31, 2015

21. The 2015 M5 Report was due on June 10, 2015; however, no report was filed with the filing officer. (Note: the 2015 M5 Report was due after Commission staff's receipt of the original instant complaint.)

22. It appears no notices were provided to Respondent by her filing officer regarding her failure to file 2015 municipal candidate Beverly Hilton's 2015 M5 Report. To review Ms. Thomas' e-mail dated October 4, 2016, refer to Exhibit 10. To review the Affidavit of Filing Officer, refer to Exhibit 11.

23. By sworn affidavit-questionnaire, Respondent affirmed, "Never informed this needed to be amended." To review her sworn affidavit, refer to Exhibit 9, question number 28.

24. I found no record of previous complaints to indicate that Respondent has violated this section of Florida's election laws.

IV. FEC History:

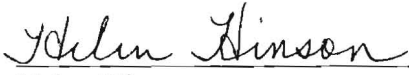
25. Respondent has no history of additional complaints filed against her with the Commission at the time of this complaint.

Conclusion:

26. On December 13, 2016, I interviewed Respondent by telephone, and reviewed my findings with her noting it appears she was never informed by the filing officer to complete amendments or that any reports had not been filed. Respondent said she was Ms. Hilton's campaign treasurer in 2010, "kept on top" of all filings, and believes every financial transaction was accounted for; however, in 2015, Ms. Hilton held on to the records and Respondent did not know what was happening during the campaign, and that really upset her. Respondent said she urged Ms. Hilton to file reports by the due dates and Ms. Hilton agreed; however, Ms. Hilton did not meet deadlines for filing CTRs on several occasions. To review the phone log, refer to Exhibit 13, entry number 26.

27. Since Respondent was not a candidate for election during the 2015 election cycle, she was not provided materials by the filing officer, and was not required to sign and file a Statement of Candidate. To review the Affidavit of Filing Officer, refer to Exhibit 11.

Respectfully submitted on December 14, 2016.


Helen Hinson
Investigation Specialist

Current address of Respondent

Ms. Joelle Franck
181 NW 110th Street
Miami Shores, Florida 33168-4320

Current address of Complainant

Ms. Stephanie S. Thomas, CMC
776 NE 125th Street
North Miami, Florida 33161-5654

Name and Address of Filing Officer:

The Honorable Michael A. Etienne, Jr.
North Miami City Clerk
776 NE 125 Street
North Miami, Florida 33161-5654

Copy furnished to:

Mr. David B. Flagg, Investigations Manager

FLORIDA ELECTIONS COMMISSION
REPORT OF INVESTIGATION
Joelle Franck -- FEC 15-359

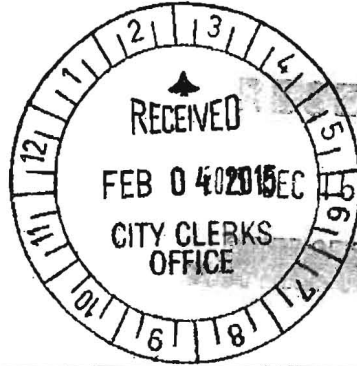
LIST OF EXHIBITS	
Exhibits #s	Description of Exhibits
Exhibit 1	Respondent's Form DS-DE 9, Appointment of Campaign Treasurer and Designation of Campaign Depository
Exhibit 2	Original 2015 M2 Report
Exhibit 3	Original 2015 M3 Report
Exhibit 4	E-mail from the Filing Officer to Beverly Hilton dated April 8, 2015
Exhibit 5	Letter from the Filing Officer to Beverly Hilton dated April 20, 2015
Exhibit 6	Certified mail envelope marked "RETURN TO SENDER NO SUCH NUMBER UNABLE TO FORWARD"
Exhibit 7	Certified mail "green card"
Exhibit 8	2015 M2 Report Amendment
Exhibit 9	Respondent's sworn affidavit-questionnaire
Exhibit 10	Ms. Thomas' e-mail dated October 4, 2016
Exhibit 11	Affidavit of Filing Officer and relevant documents
Exhibit 12	E-mail from the city clerk's office dated December 14, 2016
Exhibit 13	Phone Log

**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.



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)
Beverly Hilton

3. Address (include post office box or street, city, state, zip code)
12495 NW 6th Avenue, N. Miami, FL 33168

4. Telephone
(786) 553-8555

5. E-mail address
hiltonmiam@aol.com

6. Office sought (include district, circuit, group number)
City Council, District 4

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 Democrat Party candidate.

I have appointed the following person to act as my Campaign Treasurer Deputy Treasurer

10. Name of Treasurer or Deputy Treasurer
Joelle Franck

11. Mailing Address
181 NW 110th Street

12. Telephone
(786) 385-8237

13. City
Miami Shores

14. County
Miami-Dade

15. State
FL

16. Zip Code
33168

17. E-mail address
mswhoa36@aol.com

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

19. Name of Bank
Bank of America

20. Address
998 NE 125th Street

21. City
North Miami

22. County
Dade

23. State
FL

24. Zip Code
33161

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
02/02/2015

26. Signature of Candidate
X Beverly Hilton

27. Treasurer's Acceptance of Appointment (fill in the blanks and check the appropriate block)
I, Joelle Franck, do hereby accept the appointment
(Please Print or Type Name)

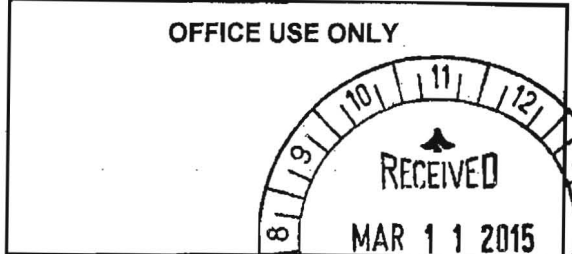
designated above as: Campaign Treasurer Deputy Treasurer.

02/02/2015
Date

X Joelle Franck
Signature of Campaign Treasurer or Deputy Treasurer

CAMPAIGN TREASURER'S REPORT SUMMARY

(1) Beverly Hilton
 Name
 (2) 12495 NW 6th Avenue
 Address (number and street)
N. Miami, FL 33168
 City, State, Zip Code



Check here if address has changed

(3) ID Number: _____

(4) Check appropriate box(es):
 Candidate Office Sought: City Council, District 4

- Political Committee (PC)
- Electioneering Communications Org. (ECO)
- Party Executive Committee (PTY)
- Independent Expenditure (IE) (also covers an individual making electioneering communications)
- Check here if PC or ECO has disbanded
- Check here if PTY has disbanded
- Check here if no other IE or EC reports will be filed

(5) Report Identifiers

Cover Period: From 02 / 01 2015 To 03 / 31 2015 Report Type: _____

Original Amendment Special Election Report

(6) Contributions This Report

Cash & Checks	\$ 0 , 2 , 225 . 00
Loans	\$ 0 , 2 , 000 . 00
Total Monetary	\$ 0 , 4 , 225 . 00
In-Kind	\$ 0 , 1 , 500 . 00

(7) Expenditures This Report

Monetary Expenditures	\$ 0 , 812 . 01
Transfers to Office Account	\$ _____ , _____ , _____
Total Monetary	\$ 0 , 812 . 01

(8) Other Distributions
 \$ 0 , 2 , 000 . 00

(9) TOTAL Monetary Contributions To Date
 \$ 0 , 4 , 225 . 00

(10) TOTAL Monetary Expenditures To Date
 \$ 0 , 2 , 812 . 01

(11) Certification

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

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

(Type name) Joelle Franck
 Individual (only for IE or electioneering comm.) Treasurer Deputy Treasurer
Joelle Franck
 Signature

(Type name) Beverly Hilton
 Candidate Chairperson (only for PC and PTY)
Beverly Hilton
 Signature

CAMPAIGN TREASURER'S REPORT - ITEMIZED CONTRIBUTIONS

(1) Name Beverly Hilton (2) I.D. Number _____

(3) Cover Period Feb / 1 / 2015 through March / 09 / 2015 (4) Page 1 of 2

(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Contributor Type Occupation		(9) Contribution Type	(10) In-kind Description	(11) Amendment	(12) Amount
Feb 1 2015 / /	Beverly Hilton 12495 NW 6th Avenue North Miami, FL 33168	Loan	Business own	CK			2000
1							
3 19 15 / /	Stanley JOHNSON	B	Lawyer	CHE			500
2							
1 /	Ilana Burdick			CHE			500
3							
1 /	Ernest Long	B	Crime Prevention	CHE			100
4							
1 /	Karen Franas	B		CHE			250
5							
1 /	William Prevotel	B	Architect Multi-family owner-operator Planning Comm	CHE			50
6							
1 /	Janet Reed	B	Water treatment operator	CHE			50
7							



CAMPAIGN TREASURER'S REPORT - ITEMIZED CONTRIBUTIONS

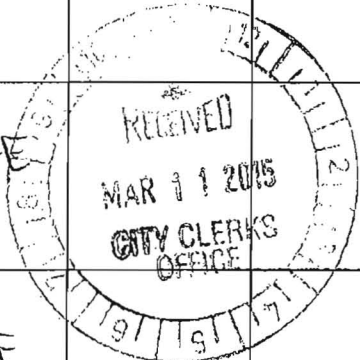
(1) Name BEVERLY HILTON

(2) I.D. Number _____

(3) Cover Period ____ / ____ / ____ through ____ / ____ / ____

(4) Page ____ of ____

(5) Date	(6) Sequence Number	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Contributor		(9) Contribution Type	(10) In-kind Description	(11) Amendment	(12) Amount
			Type	Occupation				
/ /	8	Patricia Wood-Arvetel	B		CHE			50
/ /	9	Jeppery Koebel	B	Reactor	CHE			100
/ /	10	Holly Colen	B	lawyer	CHE			250
/ /	11	Kenneth & Paula Each	B		CHE			50
/ /	12	Annie Mont Gromery	B		CHE			200
/ /	13	Inez Coach	B	Accounts Payable / Supervisor	CHE			50
/ /	14	Marla Grandis	B	Counrouler	CHE			25



CAMPAIGN TREASURER'S REPORT - ITEMIZED CONTRIBUTIONS

(1) Name BEVERLY HILTON (2) I.D. Number _____

(3) Cover Period ____ / ____ / ____ through ____ / ____ / ____ (4) Page ____ of ____

(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Contributor		(9) Contribution Type	(10) In-kind Description	(11) Amendment	(12) Amount
(6) Sequence Number		Type	Occupation				
/ /	Gayle Doyle	B	retired				50
15							
/ /							
/ /							
/ /							
/ /							
/ /							
/ /							
/ /							
/ /							



EXHIBIT 2(4 of 6)

CAMPAIGN TREASURER'S REPORT - ITEMIZED EXPENDITURES

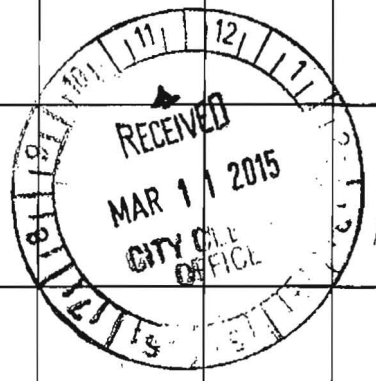
(1) Name Beverly Hilton

(2) I.D. Number _____

(3) Cover Period Feb 1 15 through 3 19 15

(4) Page _____ of _____

(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Purpose (add office sought if contribution to a candidate)	(9) Expenditure Type	(10) Amendment	(11) Amount
2/23/15	Bank of America Checks	Checks			43.00
2/11/15	Burger King NE 125 St	Lunch w/ Manager			28.57
3/13/15	Walter Haas Graphics 123 W 2nd St. Hialeah	Signs			697.64
3/8/15	Conch Haven 11275 NW 07 Ave Miami FL 33167	Volunteer Diner			42.80
1/1					
1/1					
1/1					
1/1					

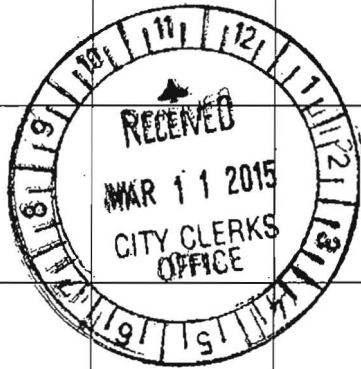


CAMPAIGN TREASURER'S REPORT - ITEMIZED DISTRIBUTIONS

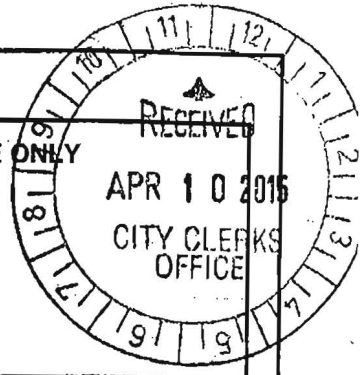
(1) Name Beverly Hilton (2) I.D. Number _____

(3) Cover Period Feb 1 15 through 31 9 15 (4) Page 1 of 1

(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Purpose (add office sought if contribution to a candidate)	(9) Related Expenditures	(10) Amendment	(11) Amount	(12) Distribution Type
(6) Sequence Number						
2/2015	William Green	Campaign Manager			2.000	CK
1 /						
1 /						
1 /						
1 /						
1 /						
1 /						
1 /						



CAMPAIGN TREASURER'S REPORT SUMMARY



OFFICE USE ONLY

(1) Beverly Hilton
 Name
 (2) 12495 NW 2nd Avenue
 Address (number and street)
North Miami, FL 33168
 City, State, Zip Code

(3) ID Number: 94

Check here if address has changed

(4) Check appropriate box(es):

- Candidate Office Sought: North Miami City Council, District 4
- Political Committee (PC)
- Electioneering Communications Org. (ECO)
- Party Executive Committee (PTY)
- Independent Expenditure (IE) (also covers an individual making electioneering communications)
- Check here if PC or ECO has disbanded
- Check here if PTY has disbanded
- Check here if no other IE or EC reports will be filed

(5) Report Identifiers

Cover Period: From 03 / 01 / 15 To 03 / 31 / 15 Report Type: _____

- Original Amendment Special Election Report

(6) Contributions This Report

Cash & Checks \$ 2,745

Loans \$ 1,200

Total Monetary \$ 3,945

In-Kind \$ 350

(7) Expenditures This Report

Monetary Expenditures \$ 3,505.36

Transfers to Office Account \$ _____

Total Monetary \$ 3,505.36

(8) Other Distributions

\$ 350

(9) TOTAL Monetary Contributions To Date

\$ 8,170

(10) TOTAL Monetary Expenditures To Date

\$ 6,317.37

(11) Certification

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

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

(Type name) Joelle Franck

- Individual (only for IE or electioneering comm.) Treasurer Deputy Treasurer

X Joelle Franck
 Signature

(Type name) Beverly Hilton

- Candidate Chairperson (only for PC and PTY)

X Beverly Hilton
 Signature

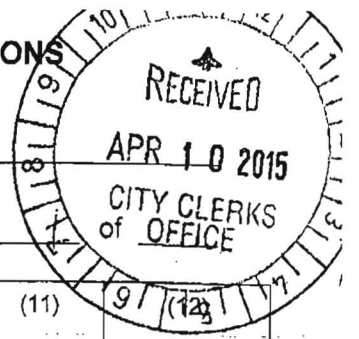
CAMPAIGN TREASURER'S REPORT - ITEMIZED CONTRIBUTIONS

(1) Name Beverly Hilton

(2) I.D. Number _____

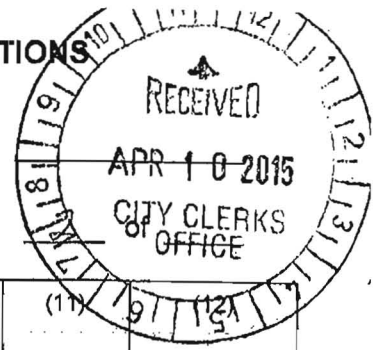
(3) Cover Period 03/11/15 through 03/31/15

(4) Page _____



(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Contributor Type Occupation		(9) Contribution Type	(10) In-kind Description	(11) Amendment	Amount
3/16/15	Barbara Bush 1780 NE 138th N. Miami, FL	I	Retired	CAS			20.00
1							
3/18/15	Christina 435 NW 124 St	I	Retired	CHE			300.00
2							
3/27/15	BOB HOWE BOATS 12565 NW 7th	B	Business owner	CHE			100-
3							
3/27/15	Royal Cleaners	B	Business owner	CHE			130-
4							
3/24/15	N. Miami Cleaners	B	Business owner	CHE			150
5							
3/29/15	Immacula G. Lome	I		CAS			75-
6							
3/18/15	Joelle Franke	I	Retired Nurse	CAS			500
7							

CAMPAIGN TREASURER'S REPORT - ITEMIZED CONTRIBUTIONS



(1) Name Beverly Hilton

(2) I.D. Number _____

(3) Cover Period 3/1/15 through 3/31/15

(4) Page _____

(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Contributor		(9)	(10)	(11) Amendment	Amount
		Type	Occupation	Contribution Type	In-kind Description		
03/18/15	Jean France	I	Rest. Manager	CAS			\$500.00
9							
3/16/15	Phillip Scott 12495 NW 6 Ave N. Miami 33168	I	Student	CAS			100.00
10							
3/25/15	Jean Jacques 12630 NE 1st St N. Miami 33168	I		INK	Walk List Telephone Driver		\$350.00
11							
3/15/15	Paula Jane 6 Oak Lane Jeanette N. Miami 33168	I	Actress	MO			\$800
12							
3/11/15	Volanda Campbell 400 NW 123 St N. Miami 33168	I	Retired	CAS			\$150
13							
3/15/15	Beverly Hilton 12495 NW 6 Ave	B	B/owner				12.00
14							
1							

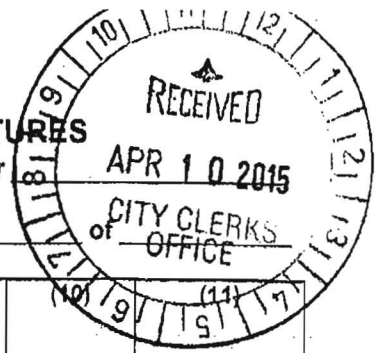
CAMPAIGN TREASURER'S REPORT - ITEMIZED EXPENDITURES

(1) Name Beverly Hilton

(2) I.D. Number _____

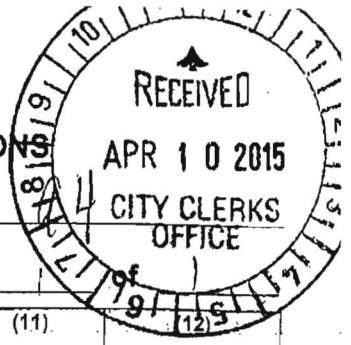
(3) Cover Period _____ through _____

(4) Page _____



(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Purpose (add office sought if contribution to a candidate)	(9) Expenditure Type	(10) Amendment	(11) Amount
3/17/15 1	Shell 12500 NW 74th N. Miami FL 33168	Travel Gas	Gas		40.00
3/18/15 2	Office Max 12255 Biscayne Blvd N. Miami, FL 33181	Office Supplies	Clipboard		6.39
3/18/15 3	Office Max 12255 Biscayne	?	Printer		32.21
3/19/15 4	Union Printing 2321 Pembroke Rd Hollywood, FL 33020	Palm Cards Printing Sup.	Palm cards		524.70
3/21/15 5	Winn-Dixie Stores 7th Avenue	Printer	Print		16.38
3/21/15 6	Happy Ending of Miami 65th - N M 106 Street N. Miami, FL 33180	Coroback T-shirts	T-shirt		339.75
3/21/15 7	Burger King 128 Street & N West 2nd Avenue N. Me	Feed WOK	meat		55.93
3/26/15 8	Easy Postal 12550 N W 74th N. Miami 33168	Office Furniture Campaign pieces	Furniture		240.00

CAMPAIGN TREASURER'S REPORT - ITEMIZED DISTRIBUTION



(1) Name Beverly Hilton (2) I.D. Number _____

(3) Cover Period 3-1-15 through 3-31-15 (4) Page _____

(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Purpose (add office sought if contribution to a candidate)	(9) Related Expenditures	(10) Amendment	(11) Amount	Distribution Type
(6) Sequence Number						
3/10/15	William Green	Manager Campaign	Manager		\$700	OK
1						
3/12/15	William Green	Pl. Staff	Walk list		\$250	\$200.00
1						
1						
1						
1						
1						

Thomas, Stephanie

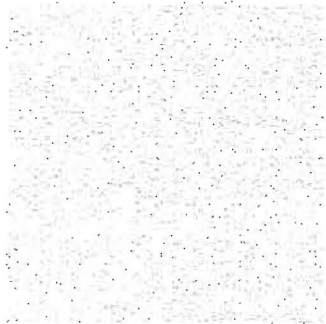
From: hiltonmiam@aol.com
Sent: Wednesday, April 08, 2015 2:37 PM
To: Thomas, Stephanie
Subject: Re: Important;.....Incomplete Campaign Treasure's Reports

Thanks Ms. Thomas, will do.

Beverly Hilton

-----Original Message-----

From: Thomas, Stephanie <sthomas@northmiamifl.gov>
To: Beverly Hilton (hiltonmiam@aol.com) <hiltonmiam@aol.com>
Cc: Etienne, Michael <metienne@northmiamifl.gov>; Louis, Thelisca <lthelisca@northmiamifl.gov>
Sent: Wed, Apr 8, 2015 10:21 am
Subject: Important;.....Incomplete Campaign Treasure's Reports



Good morning Ms. Hill,

After careful review of all the Campaign Treasurer's Summary Report turned in to date, there are a few that are incomplete. The itemized expenditure, contributor and distribution report section needs to be completed in its entirety. I have provided the link for your reference of the documents received and requires your immediate attention: http://www.northmiamifl.gov/departments/city_clerk/elections/2015.aspx

Please provide the completed contribution, itemized expenditure and distributions report for the following period:

- 2/1/15 – 2/28/15 – need complete address for all names provided

If you have any questions, please feel free to contact our office. Thank you in advance for your attention.



Stephanie S. Thomas
Deputy City Clerk

Office of the City Clerk
776 NE 125 Street
North Miami, FL 33161
305-895-9814 Direct Line
305-893-6511 Ext. 12145
305-895-0497 Fax
<http://www.northmiamifl.gov>

EXHIBIT 4 (1 of 2)

The City of North Miami is a public entity subject to Chapter 119 of the Florida Statutes concerning public records. E-mail messages are covered under such laws and thus subject to disclosure. All E-mail sent and received is captured by our servers and kept as a public record.

EXHIBIT 4 (2 of 2)



City of North Miami Office of the City Clerk
776 NE 125 Street | North Miami | Florida | 33161
Office: 305.895.9815 Fax: 305.899.0497

Michael A. Etienne, Esquire
North Miami Elected City Clerk

April 20, 2015

Certified Mail Article number 70141200000023243108

Ms. Beverly Hilton
12495 NW 2nd Avenue
North Miami, FL 33168

Dear Ms. Hilton:

As of today, we have not received the updated information on the Campaign Treasurer's Report Summary requested on April 8th sent by email. (Please see attached).

The deadline to complete this request is Friday, April 25, 2015, at noon. Otherwise, this reporting will be considered "incomplete" with possible consequences thereafter.

Thank you in advance for your prompt attention to this matter. Should you have any questions, please feel free to contact the Office of the City Clerk.

Sincerely,

Stephanie Thomas
Deputy City Clerk/Supervisor of Elections

Enclosures

City of North Miami Office of the City Clerk

EXHIBIT 5



City of North Miami, Florida
Office of the City Clerk
776 NE 125 Street
North Miami, FL 33161

407001

CERTIFIED MAIL™



7013 3020 0001 9451 4749



U.S. POSTAGE PITNEY BOWES



ZIP 33161 \$ 006.48⁰
02 1W
0001387095 APR 21 2015

NISN

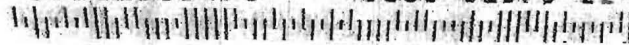
Ms. Beverly Hilton
12495 NW 2nd Avenue
North Miami, FL 33168

NIXIE 333 DE 1009 0005/05/15

RETURN TO SENDER
NO SUCH NUMBER
UNABLE TO FORWARD

BC: 33161565476 *0806-01373-22-00

0018800400650



EXHIBIT

6

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ms. Beverly Hilton
12495 NW 2nd Ave
North Miami, FL 33168

2. Article Number
(Transfer from service label)

7013 3020 0001 9451 4749

PS Form 3811, July 2013

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Agent

Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

Certified Mail®

Priority Mail Express™

Registered

Return Receipt for Merchandise

Insured Mail

Collect on Delivery

4. Restricted Delivery? (Extra Fee)

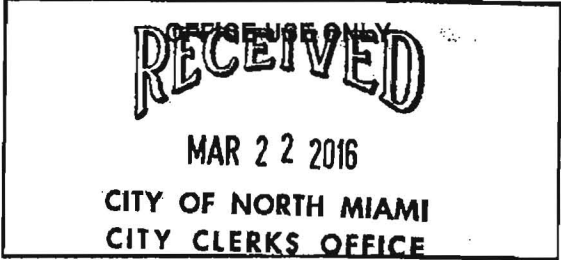
Yes

EXHIBIT

7

CAMPAIGN TREASURER'S REPORT SUMMARY

(1) Beverly Hilton
 Name
 (2) 12495 NW 6th Ave
 Address (number and street)
N. Miami FL 33168
 City, State, Zip Code



Check here if address has changed

(3) ID Number: _____

(4) Check appropriate box(es):

- Candidate Office Sought: City Council, District 4
- Political Committee (PC)
- Electioneering Communications Org. (ECO)
- Party Executive Committee (PTY)
- Independent Expenditure (IE) (also covers an individual making electioneering communications)
- Check here if PC or ECO has disbanded
- Check here if PTY has disbanded
- Check here if no other IE or EC reports will be filed

(5) Report Identifiers

Cover Period: From 02 / 01 / 2015 To 02 / 28 / 2015 Report Type: _____

Original Amendment Special Election Report

(6) Contributions This Report

Cash & Checks	\$	0	,	2	,	225.00
Loans	\$	0	,	2	,	000.00
Total Monetary	\$	0	,	4	,	225.00
In-Kind	\$	0	,	1	,	500.00

(7) Expenditures This Report

Monetary Expenditures	\$	0	,	812	,	01
Transfers to Office Account	\$	_____	,	_____	,	_____
Total Monetary	\$	0	,	812	,	01

(8) Other Distributions

\$ _____ , 2 , 000 . 00

(9) TOTAL Monetary Contributions To Date

\$ 0 , 4 , 225 . 00

(10) TOTAL Monetary Expenditures To Date

\$ _____ , 2 , 812 . 01

(11) Certification

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

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

(Type name) Joelle Franck

Individual (only for IE or electioneering comm.) Treasurer Deputy Treasurer

X Joelle Franck
 Signature

(Type name) Beverly Hilton

Candidate Chairperson (only for PC and PTY)

X Beverly Hilton
 Signature

CAMPAIGN TREASURER'S REPORT - ITEMIZED CONTRIBUTIONS

(1) Name Beverly Hilton (2) I.D. Number _____

(3) Cover Period 2 / 1 / 15 through 03 / 1 / 15 (4) Page 1 of 9

(5) Date	(7) Full Name (Last, Suffix, First, Middle)	(8) Contributor Type Occupation		(9) Contribution Type	(10) In-kind Description	(11) Amendment	(12) Amount
(6) Sequence Number	Street Address & City, State, Zip Code	Type	Occupation	Type	Description	Amendment	Amount
Feb, 1 115	Beverly Hilton 12495 NW 6 Ave N. Miami FL 33168	Loan	Business	CHE			2000
1							
3, 9 115	Stanley Johnson 9999 NE 2nd Ave Miami Shores, FL 33138	B	Lawyer	CHE			500.
2							
3, 9 115	ILana Burdick 13502 NE 24th N. Miami, FL 33181	B		CHE			500
3							
3, 9 115	Ernest Long 19200 W. Country Club Drive, Aventura Florida 33181	I					100
4							
3, 9 115	KAREN FRANKO 12580 Griffin Blvd N. Miami, FL 33168	I	Lawyer	CHE			250
5							
3, 10 115	William Prevater 11950 N. Bayshore N. Miami FL 33181	B		CHE			50
6							
3, 10 115	Janet Reed 325 NW 136 St, N. Miami, FL 33168	I		CAS			50
7							

RECEIVED
MAR 22 2016

CITY OF NORTH MIAMI
CITY CLERKS OFFICE

CAMPAIGN TREASURER'S REPORT - ITEMIZED CONTRIBUTIONS

(1) Name Beverly Hilton

(2) I.D. Number 94

(3) Cover Period 3 1 1 15 through 3 1 1 15

(4) Page 2 of 3

(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Contributor Type Occupation		(9) Contribution Type	(10) In-kind Description	(11) Amendment	(12) Amount
(6) Sequence Number		Type	Occupation	Type	Description		
3 1 9 15 8	Patricia Wood-Prevaltel 11950 N. Bayshore N. Miami, FL 33181	I	"	CHE			50
3 1 9 15 9	Jeffrey Kobel 8700 Biscayne N. Miami, FL 33181	I	Realtor	CHE	RECEIVED MAR 22 2016 CITY OF NORTH MIAMI CITY CLERKS OFFICE		100
3 1 9 15 10	Holly Cohen 2700 Biscayne N. Miami, FL 33181	B	Lawyer	CHE			250
3 1 9 15 11	Kenneth & Paula 13045 Emerald Drive N. Miami, FL 33181	A		CHE			50
3 1 9 15 12	Annie Montgomery 3082 NE 124 St N. Miami, FL 33181	B	Realtor	CHE			200
3 1 9 15 13	Inez Cochran 1050 NE 131 St N. Miami, FL 33168	I	Accountant	CHE			50
3 1 9 15 14	Maria Grandis 11950 N. Bayshore N. Miami, FL 33181	B		CAS			25

CAMPAIGN TREASURER'S REPORT - ITEMIZED CONTRIBUTIONS

(1) Name Beverly Hilton (2) I.D. Number 94

(3) Cover Period 2/1/16 through 2/1/16 (4) Page 3 of 3

(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Contributor Type Occupation		(9) Contribution Type	(10) In-kind Description	(11) Amendment	(12) Amount
3, 9, 15 15	Dayle Doyle 6909 NE 16th Street North Miami Beach FL 33162	ct	Redund	ctc			50.00
1 / 1					RECEIVED MAR 22 2016 CITY OF NORTH MIAMI CITY CLERKS OFFICE		
1 / 1							
1 / 1							
1 / 1							
1 / 1							
1 / 1							
1 / 1							
1 / 1							

AFFIDAVIT OF BACKGROUND INFORMATION
Case Number: FEC 15-359

RECEIVED

2016 AUG 26 P 1:45

STATE OF FLORIDA
County of Miami-Dade

STATE OF FLORIDA
ELECTIONS COMMISSION

Joelle Franck, being duly sworn, says:

1. This affidavit is made upon my personal knowledge.
2. I am of legal age and competent to testify to the matters stated herein. I am currently employed by Palms Care Center as Registered Nurse.
3. Have you ever run for public office? If so, please name the office(s) you ran for; the date(s) of the election(s) you ran in; and the outcome(s) of the election(s); also, include any races from which you withdrew as a candidate noting if you withdrew before or after qualifying.

No

4. Have you ever been appointed to act as a campaign treasurer and/or deputy treasurer for a candidate? If so, please name the candidate(s) you served as treasurer/deputy treasurer including your candidacy; the office(s) the candidate ran for; and the dates of the election(s).

YES - Beverly Hilton

5. Have you ever held the office of chairperson or campaign treasurer (or deputy treasurer) for a political committee? If so, please list the names and addresses of the committees, the position you held, and dates you held the position(s).

No

6. Have you ever held the office of chairperson or campaign treasurer (or deputy treasurer) for a committee of continuous existence (CCE)? (Committee of continuous existence is defined in Section 106.04, Florida Statutes (2012).) If so, please list the name and addresses of the committees, the position(s) you held, and date(s) when you held the position(s).

No

EXHIBIT 9 (1 of 7)

7. What action have you taken to determine your responsibilities as a **campaign treasurer** under Florida's election laws? (Please explain what you did to determine what was required of you as a **campaign treasurer** under Florida's election laws, such as the following: contact your local filing officer; contact the County Supervisor of Elections; contact the Division of Elections; contact an attorney; review documents provided by the filing officer; review documents available on the County Supervisor of Elections (SOE) website; review documents on the Division of Elections' website; etc.)

SOE website

8. Please identify your skills and abilities that made you comfortable accepting the appointment as campaign treasurer for Ms. Hilton's **2015** campaign.

Held position for Ms. Hilton's campaign in 2010

9. Please identify your duties and responsibilities as **campaign treasurer** for Ms. Hilton's **2015** campaign.

Attended, Assisted campaign functions
documented monies/checks received

10. For Ms. Hilton's 2015 campaign, please identify the following: a.) who kept the campaign checkbook; b.) who wrote the campaign checks; and c.) who made the bank deposits. Please provide their name, office/position/title they held in Ms. Hilton's campaign, and contact information (mailing and email address and telephone numbers).

A) Both Ms Hilton & I kept checkbook

B) Both

C) Both

Beverly Hilton candidate
455 N.W. 121 st. N. Miami, FL.
785-553-8556

EXHIBIT 9 (2 of 7)

11. Please explain if you sought guidance from anyone (supervisor of elections, Division of Elections, an attorney, etc.) prior to certifying any campaign treasurer's reports (CTRs). If so, please include in your explanation the following: when you sought guidance; from whom you sought guidance; and the specific guidance they provided concerning Florida's election laws.

No. Beverly Hilton is a long time friend and I was helping her with her campaign acting as her treasurer.

12. Do you possess a copy of Chapter 106, *Florida Statutes*? Yes No

13. If so, when did you obtain it? _____

14. Have you read Chapter 106, *Florida Statutes*? Yes No

15. Do you possess a copy of the *Candidate and Campaign Treasurer Handbook*? Yes No

16. If so, when did you obtain it? _____

17. Have you read the *Candidate and Campaign Treasurer Handbook*? Yes No

18. Do you possess a copy of Chapter 104, *Florida Statutes*? Yes No

19. If so, when did you obtain it? _____

20. Have you read Chapter 104, *Florida Statutes*? Yes No

21. Please explain if you sought guidance from anyone (supervisor of elections, Division of Elections, an attorney, etc.) concerning the provisions of **Section 106.07(2)(b)1., Florida Statutes**, and the requirement to *timely* file amendments to Ms. Hilton's **2015** CTRs after notice. If so, please include in your explanation the following: when you sought guidance; from whom you sought guidance; and the specific guidance they provided concerning **Section 106.07(2)(b)1., Florida Statutes**, prior to the filing of the instant complaint.

No

22. Please explain if you sought guidance from anyone (supervisor of elections, Division of Elections, an attorney, etc.) concerning the provisions of **Section 106.19(1)(c), Florida Statutes**, and the allegation that you, treasurer for Beverly Hilton, a **2015** candidate for the North Miami City Council, District 4, may have falsely reported or deliberately failed to include information required by Chapter 106, *Florida Statutes*, in one or more CTRs covering the period of **March 1, 2015 through May 31, 2015**, as alleged in the complaint. If so, please include in your explanation the following: when you sought guidance; from whom you sought guidance; and the specific guidance they provided concerning **Section 106.19(1)(c), Florida Statutes**, prior to the filing of the instant complaint.

EXHIBIT 9 (3 of 7)

No

23. Please describe any discussions or correspondence you had with the filing officer or a member of her/his staff during Ms. Hilton's 2015 campaign, and include the date(s) of the contact(s); identify the subject matter, and reason for the contact(s).

None

24. When and how did the North Miami City Clerk's office inform you that you were required to amend the CTR for Ms. Hilton's 2015 campaign covering the period of February 1, 2015 to February 28, 2015 to include complete addresses?

When I received certified mail from Dept. of FL. Elections commission I was never informed by City Clerks office

25. When and how did the North Miami City Clerk's office inform you that you were required to amend the CTR for Ms. Hilton's 2015 campaign covering the period of March 1, 2015 to March 31, 2015 to include complete addresses?

Never

26. When and how did the North Miami City Clerk's office inform you that you were required to file and had not filed the CTR for Ms. Hilton's 2015 campaign covering the period of April 1, 2015 to April 30, 2015?

Never

27. When and how did the North Miami City Clerk's office inform you that you were required to file and had not filed the CTR for Ms. Hilton's 2015 campaign covering the period of May 1, 2015 to May 31, 2015?

EXHIBIT 9 (4 of 7)

Never

28. **Complainant alleged violations of Sections 106.07(2)(b)1., and 106.19(1)(c), Florida Statutes.**

- a. Complainant alleged you failed to *timely* make necessary amendments to Ms. Hilton's 2015 M2 (covering the period February 1, 2015 – February 28, 2015) CTR after notice by the filing office. Please respond to this allegation.

I was never informed by clerk's office. Amendment was needed.

- b. Complainant alleged you failed to *timely* make necessary amendments to Ms. Hilton's 2015 M3 (covering the period March 1, 2015 – March 31, 2015) CTR after notice by the filing office. Please respond to this allegation.

This was corrected and submitted to the City Clerk's office in 04/2016

- c. Complainant alleged you, campaign treasurer for Beverly Hilton, a **2015** candidate for the North Miami City Council, District 4, may have falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, when you failed to file the CTRs covering the period April 1, 2015 through May 31, 2015, as alleged in the complaint.

Never informed this needed to be amended.

[Please note that any amended and/or original CTRs you complete in response to this complaint must first be filed with your filing officer, and then provide this office with a date-and-time stamped copy for our records.]

29. Please explain if you reviewed with the candidate each CTR prior to certifying each CTR. If so, please identify what you specifically discussed with her regarding each CTR.

Not all the time

EXHIBIT 9 (5 of 7)

30. Please describe the review process and/or any checks and balances in place to ensure that each CTR accurately reflected the campaign contributions received and the campaign expenditures made by Ms. Hilton's **2015** campaign including complete addresses for contributions and expenditures prior to certifying each CTR.

No process was in place

31. Please identify the specific CTRs for Ms. Hilton's **2015** campaign that you completed by identifying the report cover period, the name, address and occupation, if needed, for contributions, and names, address, and purpose for expenditures prior to certifying the CTR.

see CTR's on file

32. Please describe and explain your review of the report covering the period of **February 1 through 28, 2015**, prior to certifying it, and why you did not include complete addresses for contributions and/or expenditures.

Did not review

33. Please describe and explain your review of the report covering the period of **March 1 through 31, 2015**, prior to certifying it, and why you did not include complete addresses for contributions and/or expenditures.

*did not put addresses of checks
should of made copies prior to depositing
them.*

EXHIBIT 9 (6 of 7)

34. Please describe and explain why you failed to file the report covering the period of **April 1 through 30, 2015.**

I thought Ms. Hilton submitted reports

35. Please describe and explain why you failed to file the report covering the period of **May 1 through 31, 2015.**

Assumed Ms. Hilton submitted reports

36. Please provide any additional comments you wish to make in the space below.

Ms. Hilton and I have been friends for about 50 years and I was being a friend and helping her with her campaign. At no time was I contacted by the City Clerk's Office of Violations.

I HEREBY SWEAR OR AFFIRM THAT THE FOREGOING INFORMATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

**Jude Deronceray
Notary Public
State of Florida
My Commission Expires 12/01/2018
Commission No. FF 179990**

8-22-16

Joelle Franck

Signature of Affiant

Jude Deronceray

Print or type the name of the Affiant in the space above as it appears on her I.D.

Sworn to (or affirmed) and subscribed before me this 22 day of

August, 2016.

Jude Deronceray

Signature of Notary Public - State of Florida

Print, Type, or Stamp Commissioned Name of Notary Public

Personally Known Joelle Franck or Produced Identification J Franck
Type of Identification Produced: Driver's License

Case Investigator: HH

EXHIBIT 9 (7 of 7)



RE: CONFIDENTIAL - Case No.: FEC 15-359
Thomas, Stephanie
to:
Helen Hinson
10/04/2016 12:24 PM
Hide Details
From: "Thomas, Stephanie" <sthomas@northmiamifl.gov>
To: Helen Hinson <Helen.Hinson@myfloridalegal.com>

1 Attachment



Re_ Important;.....Incomplete Campaign Treasure's Reports.pdf

Good afternoon Ms. Hinson,



Notices were not sent to Joelle Franck regarding incomplete or missing (failure to file) campaign treasurer reports for Ms. Hilton's 2015 campaign .

We do not have any additional notices that were sent to Ms. Hilton. I'm not sure if you have the attached document in your file, but a response to my email dated April 8, 2015, is attached for your review.

Sincerely,

Stephanie S. Thomas, CMC

Deputy City Clerk
City of North Miami
305-895-9814, Ext. 12145 - Direct Line
305-895-9817 Main Line
305-895-0497 Fax
<http://www.northmiamifl.gov>

Please print only if necessary.

From: Helen Hinson [<mailto:Helen.Hinson@myfloridalegal.com>]
Sent: Friday, September 30, 2016 11:06 AM
To: Thomas, Stephanie <sthomas@northmiamifl.gov>
Subject: CONFIDENTIAL - Case No.: FEC 15-359

Stephanie Thomas
Deputy City Clerk
Office of the North Miami City Clerk
776 NE 125 Street
North Miami, FL 33161
PH: 305.895.9815

RE: Case No.: FEC 15-359
Confidential pursuant to s. 106.25(7), F.S.

Dear Ms. Thomas:

EXHIBIT 10 (1 of 5)

Please provide copies of any notices sent to Joelle Franck regarding incomplete or missing (failure to file) campaign treasurer reports for Ms. Hilton's 2015 campaign. If no notices were sent, please let me know.

Also, please provide copies of any notices sent to Beverly Hilton other than the email dated April 8, 2015 and letter sent on April 20, 2015. If no additional notices were sent, please let me know.

Thank you in advance for your assistance in resolving this matter.

Helen Hinson

Investigation Specialist
Florida Elections Commission
The Collins Building, Ste. 224
107 West Gaines Street
Tallahassee, FL 32399-1050
helen.hinson@myfloridalegal.com
PH: 850.922.4539, extension 115
FAX: 850.921.0783
www.fec.state.fl.us

Please note: Florida has a very broad public records law. Written communications to or from me 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.

The City of North Miami is a public entity subject to Chapter 119 of the Florida Statutes concerning public records. E-mail messages are covered under such laws and thus subject to disclosure. All E-mail sent and received is captured by our servers and kept as a public record.

EXHIBIT 10 (2 of 5)

From: hiltonmiam@aol.com
To: [Thomas, Stephanie](mailto:Thomas.Stephanie)
Subject: Re: Important;.....Incomplete Campaign Treasure's Reports
Date: Thursday, May 07, 2015 5:26:22 PM
Attachments: [image003.png](#)

Thanks Stephanie, I will .
Beverly Hilton

-----Original Message-----

From: Thomas, Stephanie <sthomas@northmiamifl.gov>
To: hiltonmiam@aol.com
Cc: Louis, Thelisca <lthelisca@northmiamifl.gov>
Sent: Thu, May 7, 2015 2:36 pm
Subject: RE: Important;.....Incomplete Campaign Treasure's Reports

Good afternoon Beverly,

Per our conversation, please find attached the letter sent to you by certified mail regarding the previous email below. Thank you for confirming the mailing address on the letter.

Stephanie Thomas

Deputy City Clerk
City of North Miami
305-895-9814 Direct Line
305-895-9817 Main Line
305-895-0497 Fax
<http://www.northmiamifl.gov>

Please print only if necessary.

From: hiltonmiam@aol.com [<mailto:hiltonmiam@aol.com>]
Sent: Wednesday, April 08, 2015 2:37 PM
To: Thomas, Stephanie
Subject: Re: Important;.....Incomplete Campaign Treasure's Reports

Thanks Ms. Thomas, will do.

Beverly Hilton

-----Original Message-----

From: Thomas, Stephanie <sthomas@northmiamifl.gov>
To: Beverly Hilton (hiltonmiam@aol.com) <hiltonmiam@aol.com>
Cc: Etienne, Michael <metienne@northmiamifl.gov>; Louis, Thelisca <lthelisca@northmiamifl.gov>
Sent: Wed, Apr 8, 2015 10:21 am

EXHIBIT 10 (3 & 5)

Subject: Important;.....Incomplete Campaign Treasure's Reports

Good morning Ms. Hill,

After careful review of all the Campaign Treasurer's Summary Report turned in to date, there are a few that are incomplete. The itemized expenditure, contributor and distribution report section needs to be completed in its entirety. I have provided the link for your reference of the documents received and requires your immediate attention:

http://www.northmiamifl.gov/departments/city_clerk/elections/2015.aspx

Please provide the completed contribution, itemized expenditure and distributions report for the following period:

2/1/15 – 2/28/15 – need complete address for all names provided

If you have any questions, please feel free to contact our office. Thank you in advance for your attention.



Stephanie S. Thomas

Deputy City Clerk

Office of the City Clerk

776 NE 125 Street

North Miami, FL 33161

305-895-9814 Direct Line

305-893-6511 Ext. 12145

305-895-0497 Fax

<http://www.northmiamifl.gov>



Please print only if necessary

The City of North Miami is a public entity subject to Chapter 119 of the Florida Statutes concerning public records. E-mail messages are covered under such laws and thus subject to disclosure. All E-mail sent and received is captured by our servers and kept as a public record.

EXHIBIT 10 (4 of 5)

The City of North Miami is a public entity subject to Chapter 119 of the Florida Statutes concerning public records. E-mail messages are covered under such laws and thus subject to disclosure. All E-mail sent and received is captured by our servers and kept as a public record.

EXHIBIT 10(5 of 5)

AFFIDAVIT OF FILING OFFICER
Case Number: FEC 15-359

2015 MAR 30 2 23 40

STATE OF FLORIDA
County of Miami-Dade

Stephanie Thomas, being duly sworn, says:

- 1. This affidavit is made upon my personal knowledge.
- 2. I am of legal age and competent to testify to the matters stated herein. I am currently employed by City of North Miami as Deputy City Clerk.

3. Please provide copies of the listed items from the following candidate's campaign file: **Beverly Hilton.**

Check	ITEM
X	Addendum requests and proof of compliance for the 2015 campaign.
X	Any campaign checks issued by the candidate's 2015 campaign to your office (qualifying fee, etc.). Please do <u>not</u> redact.

4. Please check each item provided to the candidate or her/his staff, and list the date that the item was provided.

Check	ITEM	DATE
X	Chapter 106, <i>Florida Statutes</i>	3/30/2015
X	<i>Candidate and Campaign Treasurer Handbook</i> . <u>Please indicate Year or Edition.</u> <Enter Year or Edition>	3/30/15
	Other: ¹	

5. Regarding Chapter 106, Florida Statutes, and the *Candidate and Campaign Treasurer Handbook*, how are these publications provided to the candidate and/or her staff?

- o Publications are given directly to the candidate and/or her staff.

¹ Any local publications relative to the Election laws that may have been provided in lieu of the *Candidate and Campaign Treasurer Handbook* published by the Division of Elections. If your office published the item(s), please send a copy of the item(s) with the affidavit.

- Publications are available in the office; candidate and/or her staff are advised to pick-up the publications for themselves.
- ☒ Candidate and/or her staff are advised to download copies of the publications from our website or the Division of Elections' website.
- Other, please explain. <fill in>

6. Did your office offer any candidate/campaign treasurer workshops or training seminars prior to the **2015** election? Yes, or No. If yes, please list all workshops/training seminars that were attended by the candidate and/or her staff, along with the date(s) of attendance. If a staff member attended for the candidate, list her/his name and position. If available, please attach a copy of any attendance sheets from the workshops/training seminars, and if available, please provide a copy of the syllabus and outline for the workshops/seminars. <fill in>

7. Did your office notify this candidate and/or her staff of the availability of candidate/campaign treasurer training seminars or workshops at the County Supervisor of Elections office or another office (including, but not limited to the County Inspector General or Ethics Office, etc.)? Yes, or No. If so, please provide a copy of the notice(s). <fill in>

8. Does your office have any record of **Joelle Franck** (campaign treasurer for candidate Beverly Hilton) having sought elective office within your jurisdiction prior to the **2015** election? Yes, or No. If yes, please list the previous office(s) she ran for, the date(s) of the election(s), and the result(s) of the election(s). <fill in>

9. Does your office have any record of **Joelle Franck** having been named as a campaign treasurer for a candidate prior to 2015 within your jurisdiction? Yes, or No. If yes, please list the name(s) of the committees. <fill in>

10. Does your office have any record of **Joelle Franck** having been named as a chairperson or campaign treasurer of a political committee or electioneering communication organization within your jurisdiction? Yes, or No. If yes, please list the name(s) of the committees. <fill in>

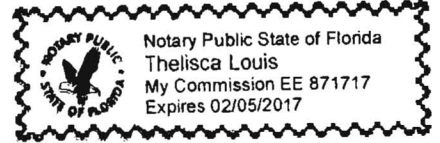
11. Did you or any member from your staff have any discussions with **Joelle Franck** concerning a provision of Chapter 106, Florida Statutes, at any time regarding **Beverly Hilton's 2015** campaign? Yes, or No. If yes, please indicate whether the discussion was in person, in writing, or by telephone, and the subject matter of the discussion. If applicable, please provide copies of any correspondence documenting the discussion(s). <fill in>

I SWEAR OR AFFIRM THAT THE INFORMATION CONTAINED IN THIS DOCUMENT IS COMPLETE AND ACCURATE TO THE BEST OF MY KNOWLEDGE.

[Signature]
Signature of Affiant

Sworn to (or affirmed) and subscribed before me this 18 day of May, 2016.

[Signature]
Signature of Notary Public - State of Florida
Print, Type, or Stamp Commissioned Name of Notary Public



Personally Known or Produced Identification _____

Type of Identification Produced: _____

Case investigator: **HH**

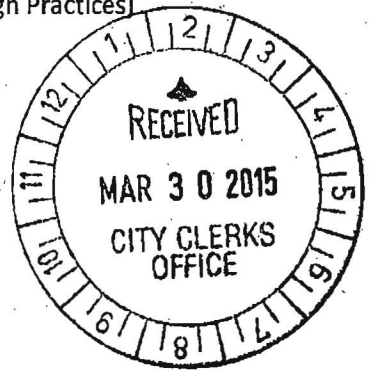
NORTH MIAMI

776 NE 125 Street North Miami, FL 33161 305-895-9817

CONTENTS OF PACKET

- 1 ✓ Notice of Election, Ordinances/Resolution # 2015 R 23
- 2 ✓ Ordinance # 1315 Political Signs
- 3 ✓ Qualifying Fees for upcoming Elections- memo to Candidates
- 4 ✓ List of Financial Filing Dates
- 5 ✓ Guide to Sunshine Amendment and Code of Ethics for public officers and employees
- 6 ✓ A Compilation of The Election Laws of the State of Florida Statutes published on the Division of Elections website: (<https://doe.dos.state.fl.us/index.shtml>)
- 7 ✓ North Miami Charter
- 8 ✓ North Miami Election Code
- 9 ✓ List of City of North Miami Precincts
- 10 ✓ Chapter 104, Florida Statutes and Chapter 106, Florida Statutes published on the Division of Elections website: (<https://doe.dos.state.fl.us/index.shtml>)
- 11 ✓ Candidate & Campaign Treasurer Handbook 2014 published on the Division of Elections website: (<https://doe.dos.state.fl.us/index.shtml>)
- 12 ✓ Statement of Financial Interest for 2015 regular Election Campaign in North Miami.
- 13 ✓ Oath of Candidate-NONPARTISAN OFFICE
- 14 ✓ Declaration and First Amendment Waiver (Voluntary Statement of Fair Campaign Practices)
- 15 ✓ Loyalty Oath
- 16 ✓ Statement of Candidate
- 17 ✓ Poll Watcher Designation Form and Instructions
- 18 ✓ Miami-Dade Absentee Ballot Activities Summary
- 19 ✓ Qualifying Papers and Voting Equipment Pretest
- 20 ✓ Affidavit of Residency of Candidate

CERTIFICATION
I certify this to be a true and correct copy of the record in my office.
WITNESSETH my hand and official seal of the City of NORTH MIAMI Florida, this the 18 day of May 20 16
Louis Thelisea for the City Clerk



Checked By Beverly Hilton
Received By Beverly Hilton

Date 3-30-15
Date 3-30-15

Beverly Hilton
Candidate Name

[Signature]
Signature

PLEASE NOTE:

QUALIFYING BEGINS MARCH 30th 2015 THROUGH APRIL 7th 2015, 12:00 PM EASTERN STANDARD TIME



City of North Miami Office of the City Clerk
 776 NE 125 Street | North Miami | Florida | 33161
 Office: 305.895.9815 Fax: 305.899.0497

Michael A. Etienne, Esquire
 North Miami Elected City Clerk

April 20, 2015

Certified Mail Article number 70141200000023243108

Ms. Beverly Hilton
 12495 NW 2nd Avenue
 North Miami, FL 33168

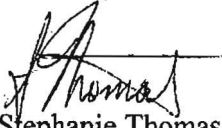
Dear Ms. Hilton:

As of today, we have not received the updated information on the Campaign Treasurer's Report Summary requested on April 8th sent by email. (Please see attached).

The deadline to complete this request is Friday, April 25, 2015, at noon. Otherwise, this reporting will be considered "incomplete" with possible consequences thereafter.

Thank you in advance for your prompt attention to this matter. Should you have any questions, please feel free to contact the Office of the City Clerk.

Sincerely,


 Stephanie Thomas
 Deputy City Clerk/Supervisor of Elections

Enclosures

CERTIFICATION

I certify this to be a true and correct copy of the record in my office.

WITNESSETH my hand and official seal of the City of NORTH MIAMI

Florida, this the 18th day of

May 20 16
Mouis, Theisea for the City Clerk

City of North Miami Office of the City Clerk

EXHIBIT 11 (5 of 6)

**2014-2015 Calendar of Reporting Dates for
2016/2018 Miami-Dade County Candidates,
Political Committees, Electioneering Communication Organizations,
and Independent Expenditure Organizations**

Monthly Reports:

Reports shall be filed on the 10th day following the end of a calendar month from the time the campaign treasurer is appointed, except that if the 10th day following the end of a calendar month occurs on a Saturday, Sunday, or legal holiday, the report shall be filed on the next following day that is not a Saturday, Sunday, or legal holiday. [F.S. 106.07(1)]

Report	From	To	Due Date	Notes
2014-M09	09-01-14	09-30-14	10-10-14	Monthly Report
2014-M10	10-01-14	10-31-14	11-10-14	Monthly Report
2014-M11	11-01-14	11-30-14	12-10-14	Monthly Report
2014-M12	12-01-14	12-31-14	01-12-15	Monthly Report

Report	From	To	Due Date	Notes
2015-M01	01-01-15	01-31-15	02-10-15	Monthly Report
2015-M02	02-01-15	02-28-15	03-10-15	Monthly Report
2015-M03	03-01-15	03-31-15	04-10-15	Monthly Report
2015-M04	04-01-15	04-30-15	05-11-15	Monthly Report
2015-M05	05-01-15	05-31-15	06-10-15	Monthly Report
2015-M06	06-01-15	06-30-15	07-10-15	Monthly Report
2015-M07	07-01-15	07-31-15	08-10-15	Monthly Report
2015-M08	08-01-15	08-31-15	09-10-15	Monthly Report
2015-M09	09-01-15	09-30-15	10-13-15	Monthly Report
2015-M10	10-01-15	10-31-15	11-10-15	Monthly Report
2015-M11	11-01-15	11-30-15	12-10-15	Monthly Report
2015-M12	12-01-15	12-31-15	01-11-16	Monthly Report

Dear Ms. Thomas;

Thank you for your reply.

Helen Hinson
Investigation Specialist
Florida Elections Commission
The Collins Building, Ste. 224
107 West Gaines Street
Tallahassee, FL 32399-1050
helen.hinson@myfloridalegal.com
PH: 850.922.4539, extension 115
FAX: 850.921.0783
www.fec.state.fl.us

Please note: Florida has a very broad public records law. Written communications to or from me 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.

"Thomas, Stephanie" <sthomas@northmiamifl.gov> wrote on 12/14/2016 11:24:42 AM:

> From: "Thomas, Stephanie" <sthomas@northmiamifl.gov>
> To: Helen Hinson <Helen.Hinson@myfloridalegal.com>
> Date: 12/14/2016 11:24 AM
> Subject: RE: CONFIDENTIAL - Case No.: FEC 15-359
>
> Good morning Ms. Hinson,
>
> We do not have the amended 2015 M3 Report covering the period of
> March 1, 2015 through March 31, 2015 in our files.
>
> Let me know if you need any additional information. Thank you.
>
> Sincerely,
>
>
> Stephanie S. Thomas, CMC
> Deputy City Clerk
> City of North Miami
> 305-895-9814, Ext. 12145 - Direct Line
> 305-895-9817 Main Line
> 305-895-0497 Fax
> <http://www.northmiamifl.gov>
>
>
> Please print only if necessary.
>
>
> From: Helen Hinson [mailto:Helen.Hinson@myfloridalegal.com]
> Sent: Tuesday, December 13, 2016 12:22 PM
> To: Thomas, Stephanie <sthomas@northmiamifl.gov>

> Cc: Louis, Thelisca <lthelisca@northmiamifl.gov>
> Subject: CONFIDENTIAL - Case No.: FEC 15-359
>
> Stephanie Thomas
> Deputy City Clerk
> Office of the North Miami City Clerk
> 776 NE 125 Street
> North Miami, FL 33161
> PH: 305.895.9815
>
> RE: Case No.: FEC 15-359
> Confidential pursuant to s. 106.25(7), F.S.
>
> Dear Ms. Thomas:
>
> Please provide a copy of Beverly Hilton's amended 2015 M3 Report
> covering the period of March 1, 2015 through March 31, 2015. I am
> uncertain if it was filed with your office; however, it may have
> been filed in March or April 2016.
>
> Thank you in advance for your assistance in resolving this matter.
> Helen Hinson
> Investigation Specialist
> Florida Elections Commission
> The Collins Building, Ste. 224
> 107 West Gaines Street
> Tallahassee, FL 32399-1050
> helen.hinson@myfloridalegal.com
> PH: 850.922.4539, extension 115
> FAX: 850.921.0783
> www.fec.state.fl.us
>
> Please note: Florida has a very broad public records law. Written
> communications to or from me 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.
>
> The City of North Miami is a public entity subject to Chapter 119 of
> the Florida Statutes concerning public records. E-mail messages are
> covered under such laws and thus subject to disclosure. All E-mail
> sent and received is captured by our servers and kept as a public record.
> --

**FLORIDA ELECTIONS COMMISSION
PHONE LOG
Case No.: FEC 15-359**

Respondent: Joelle Franck

Complainant: Stephanie Thomas

1. **Date and time:** 04/26/16; 2:07 p.m.
Name: Beverly Hilton, candidate
Phone #: 786-553-8555 (caller I.D.)
Summary: She phoned, informed me she was a candidate and wished to discuss an amended report to be filed with the city clerk; however, she did not have a case number and I did not recall her as a Respondent that I was currently investigating; she agreed to obtain the case number on the letter from Commission staff.
Memo to File? No
Entered by: HH
2. **Date and time:** 04/26/16; 2:19 p.m.
Name: Beverly Hilton, candidate
Phone #: 786-553-8555 (caller I.D.)
Summary: She phoned and identified the case number FEC 15-359; I informed her it appears she is not a Respondent before the Commission and I'm unable to discuss anything with her. She acknowledged she is the candidate; I again reiterated that I'm unable to discuss anything with her at this time. She noted she will have her treasurer call me. (It appears our notice was originally sent to Ms. Hilton who was identified on the original complaint.)
Memo to File? No
Entered by: HH
3. **Date and time:** 05/06/16
Name: Respondent—Joelle Franck
Phone #: UNK
Summary: She phoned and reached the office general voice-mailbox.
Memo to File? No
Entered by: HH
4. **Date and time:** 05/06/16; 11:28 a.m.
Name: Respondent—Joelle Franck
Phone #: 786-385-8237
Summary: I was informed by Commission staff that Respondent had called (no time of her call was provided to me), and I returned her call. Respondent explained that she had called after going to the city clerk's office and submitting amended report(s), and was informed by the clerk's staff to inform our office that she had submitted amended report(s). I explained that I will obtain copies of her filings, review them and draft a questionnaire that I wish to send to her by email; she provided her email address:

EXHIBIT 13 (1 of 8)

bthechallenger1@aol.com. I explained our process, and confirmed her contact information. She apologized for the trouble caused by the instant complaint.

Memo to File? No

Entered by: HH

5. **Date and time:** 05/06/16; 11:44 a.m.

Name: North Miami City Clerk's office

Phone #: 305-895-9817

Summary: I phoned, identified myself, requested to speak with Stephanie Thomas, deputy city clerk; however, I was informed by female voice answering the phone that she will not return until Monday, but "Louis, the Supervisor of Elections" was available; I asked to speak with Thelisca Louis, and she informed me that she had offered to have "Louis" speak with me, and transferred my call to him. I identified myself, explained that Joelle Franck had informed me that she had filed amended report(s) today and I wished to obtain copies; I provided my email address.

Memo to File? No

Entered by: HH

6. **Date and time:** 05/16/16; 11:03 a.m.

Name: Rafael S. Pedron, North Miami City Clerk's office

Phone #: 305-895-9817

Summary: I phoned to speak with Thelisca Louis since I had not received R's amended CTRs that she said she filed in May 2016; I was informed he's not in today, but Stephanie Thomas is in a meeting and should be available later today. I identified myself, provided my contact number, and requested Ms. Thomas return my call regarding (Respondent Joelle Franck.

Memo to File? No

Entered by: HH

7. **Date and time:** 05/16/16; 11:38 a.m.

Name: North Miami City Clerk's office

Phone #: 305-895-9817

Summary: I phoned, Gertie answered the phone, I identified myself, requested to speak with Rafael to obtain the filing schedule for CTRs; my call was transferred to Parks and Recreation; I explained that I was trying to reach Rafael Pedron and requested the City Clerk's office; Stephanie Thomas answered my call. I identified myself and she noted she had a message from Rafael to call me; I explained what had happened and requested a copy of the filing schedule for the 2015 municipal election when Beverly Hilton was a candidate; Ms. Thomas said she was going to ask for which candidate and agreed to email a copy to me as soon as it's received. I confirmed my email address.

Memo to File? No

Entered by: HH

8. **Date and time:** 05/16/16; 12:08 p.m.

Name: Stephanie Thomas, North Miami City Clerk's office

Phone #: 305-895-9817

EXHIBIT 13 (2 of 8)

Summary: I phoned, thanked her for providing the calendar of reporting dates and requested she clarify the periods her complaint covered since she identified April 4 through May 30, 2015 in her complaint narrative. Ms. Thomas explained that Respondent failed to amend her 2015 M2 Report (February 1 through 28, 2015) after notice, her 2015 M3 Report had incomplete addresses (due April 10 or 11, 2015, as identified in her complaint narrative and attached to the complaint), and no reports were filed after the period of March 1 through 31, 2015—2015 M4 and M5 Reports—including her termination report (TR). I noted the 2015 TR for the municipal election should have been due after our receipt of her complaint; therefore, if she wishes us to investigate her failure to file the 2015 TR, Ms. Thomas should file a complaint for that issue. Ms. Thomas identified period of April 4 through May 30, 2015 in her complaint narrative, but declared she intended to identify the April 2015 and May 2015 reports in her complaint narrative.

Memo to File? No

Entered by: HH

9. **Date and time:** 05/16/16; 4:15 p.m.

Name: Stephanie Thomas, North Miami City Clerk's office

Phone #: 305-895-9817

Summary: I phoned, identified myself and requested to speak with Ms. Thomas; I identified myself, explained that I wish to email an affidavit to their office and asked if I should direct it to her or Louis. Ms. Thomas explained that she has been so busy today as they also service customers wishing to obtain passports; she directed me to email it to her. I identified some items I wish to obtain and she noted some items are available on their website; we reviewed their website together. I agreed to amend my affidavit.

Memo to File? No

Entered by: HH

10. **Date and time:** 05/17/16; 11:25 a.m.

Name: Thelisca Louis, Assistant North Miami City Clerk

Phone #: 305-893-6511 (caller I.D.)

Summary: Thelisca Louis called, spoke with Erin Riley; however, she was unable to understand him but believed he wished to speak with me and transferred his call to me. He asked if my concerns had been addressed since he was out of the office yesterday (I had called at 11:03 a.m. requesting to speak with him); I confirmed. He explained that Beverly Hilton and/or Joelle Franck had been at his office weeks ago wishing he file CTRs with our office. He had informed her that he was not required to do so and directed her and/or her attorney to respond to the letter she had in her hand regarding a case against her.

Memo to File? No

Entered by: HH

11. **Date and time:** 08/10/16; 4:57 p.m.

Name: Respondent—Joelle Franck

Phone #: 786-385-8237

Summary: I phoned, identified myself, informed her I am emailing a questionnaire to her, confirmed her email address is bthechallenger1@aol.com, provided my email address and noted if she has any questions to please let me know.

Memo to File? No

EXHIBIT 13 (3 of 8)

Entered by: HH

12. **Date and time:** 09/23/16; 10:56 a.m.
Name: Beverly Hilton, candidate Respondent served as campaign treasurer
Phone #: 786-553-8555
Summary: I phoned, identified myself, requested to speak with Ms. Hilton, she acknowledged that I had reached her but she was in a class and requested my number so she may return my call; I provided same.
Memo to File? No
Entered by: HH

13. **Date and time:** 09/23/16; 1:08 p.m.
Name: Beverly Hilton, candidate Respondent served as campaign treasurer
Phone #: 786-553-8555 (caller I.D.)
Summary: Ms. Hilton returned my call; she explained that she's very busy with school since they're one teacher short, the city clerk has a personal vendetta against her because her friend tried to run against him for city clerk during the 2015 election and he holds Ms. Hilton responsible. Ms. Hilton said she loaned her personal funds to her campaign, the account is closed and she did not reimburse herself. She indicated that the city clerk's office sent certified mail notice to her but she never picked up the mail because the post office was closed when she got off work and she's busy doing other errands on Saturdays. Ms. Hilton said Respondent has never been a candidate, they are long-time friends, everything was filed as required. I explained that I would like to email a questionnaire to her for her to complete, have notarized, and return the original to me; she provided her email address: hiltonmiam@aol.com. I asked her to confirm her receipt of my email; she agreed.
Memo to File? No
Entered by: HH

14. **Date and time:** 09/23/16; 1:37 p.m.
Name: Tammy, Bank of America Legal Order Processing
Phone #: 213-580-0702
Summary: I phoned, maneuvered through their phone tree and reached Tammy; I identified myself, explained that I had received a CD in response to my subpoena; however, when I put it in the drive nothing happens; she said she'll request a new CD and it'll take up to 3 days to process the request.
Memo to File? No
Entered by: HH

15. **Date and time:** Monday, 09/26/16; 10:48 a.m.
Name: Beverly Hilton, candidate for which R served as campaign treasurer
Phone #: UNK
Summary: She phoned and reached my voice-mailbox; she indicated she has not received the affidavit by email as we discussed.
Memo to File? No
Entered by: HH

EXHIBIT 13 (4 of 8)

16. **Date and time:** Monday, 09/26/16; 2:19 p.m.
Name: Alyson Ramos, Bank of America Legal Order Processing
Phone #: UNK
Summary: She phoned, confirmed she had received a request for a duplicate CD and requested that I verify that I need a duplicate, it will take 3 business days to arrive, provided their reference number: D080116000238; her telephone number, PH: 302-455-6439.
Memo to File? No
Entered by: HH
17. **Date and time:** 09/27/16; 9:10 a.m.
Name: Alyson Ramos, Bank of America Legal Order Processing
Phone #: 302-455-6439
Summary: I phoned, acknowledged that we had been able to view the documents; therefore, no CD is required. However, no information included regarding number of debit cards and authorized users; she will provide an affidavit indicating one card, (Ms. Hilton), etc. I had question about "Endorsement" tab on records, but will have to return her call when I am viewing them.
Memo to File? No
Entered by: HH
18. **Date and time:** 09/27/16; 5:45 p.m.
Name: Beverly Hilton, candidate for which R served as campaign treasurer
Phone #: 786-553-8555
Summary: I phoned, identified myself, requested to speak with Ms. Hilton, and she confirmed I had reached her; I explained I had received her message, had reviewed the bank records and had additional questions that I wished to include in the questionnaire and I will try to email it to her by the end of this week noting we will be moving to temporary office space on Thursday, September 29, 2016.

Ms. Hilton confirmed bank statements were mailed to her home, Respondent did not have access to them, and Ms. Hilton obtained and used her campaign's only debit card. I noted that CTRs from her 2011 campaign had hand-written contribution and missing or incomplete address; Ms. Hilton confirmed she had made the hand-written addition. Ms. Hilton noted this was her third campaign and she had never had any problems with her CTRs until the city clerk had it out for her because she helped her friend who wanted to run for city clerk in 2015. I offered that the absence of previous complaints was no indication that her CTRs were flawless or she did everything properly.

I informed Ms. Hilton that her 2015 M4 and M5 Reports were not filed with the city clerk's office based upon my review of the city clerk's website, and according to the bank records she had a lot of campaign finance activity including several overdraft fees until June 8, 2015 when her campaign depository was closed. Ms. Hilton said she will file the missing CTRs and report her campaign finance activity. I agreed to call and leave a voice-mail message to let her know when I email the questionnaire since she is busy as a school teacher.

Memo to File? No

EXHIBIT 13 (5 of 8)

Entered by: HH

19. **Date and time:** 09/29/16; 5:00 p.m.
Name: Beverly Hilton, candidate for which R served as campaign treasurer
Phone #: 786-553-8555
Summary: I phoned, reached the voice-mailbox for “the Challenger School.” I identified myself, informed her that I had emailed the questionnaire as we discussed and to let me know if she had any questions; I provided my office number as 850-922-4539.
Memo to File? No
Entered by: HH
20. **Date and time:** 09/29/16; 5:00 p.m.
Name: Beverly Hilton, candidate for which R served as campaign treasurer
Phone #: UNK
Summary: She returned my call; I explained that I had emailed the questionnaire as we discussed; she agreed to start on the questionnaire, complete it and return it by the due date.
Memo to File? No
Entered by: HH
21. **Date and time:** 10/13/16; 10:29 a.m.
Name: Beverly Hilton, candidate for which R served as campaign treasurer
Phone #: 786-553-8555
Summary: Ms. Hilton phoned and requested a two-week extension for completing the questionnaire as she has many obligations in addition to the recent hurricanes; I agreed to the extension (end-of-the-month). She noted that Jacqie Vieira—former Deputy City Clerk for North Miami, Florida—always called to remind candidates when reports were due; however, the current city clerk’s staff does not provide reminders.
Memo to File? No
Entered by: HH
22. **Date and time:** 12/12/16; 2:05 p.m.
Name: Respondent—Joelle Franck
Phone #: 786-553-8555 (wrong number)
Summary: I phoned, requested to speak with Respondent/Ms. Franck; however, I reached Ms. Hilton in error and requested Ms. Hilton to excuse the call as I had reached her number in error.
Memo to File? No
Entered by: HH
23. **Date and time:** 12/12/16; 2:10 p.m.
Name: Beverly Hilton, candidate for which R served as campaign treasurer
Phone #: 786-553-8555 (caller I.D.)
Summary: She phoned and reached my voice-mailbox; she requested I call her at 786-553-8555.
Memo to File? No
Entered by: HH

EXHIBIT 13 (6 of 8)

24. **Date and time:** 12/12/16; 2:15 p.m.
Name: Beverly Hilton, candidate for which R served as campaign treasurer
Phone #: 786-553-8555
Summary: I returned her call; she recognized my voice and asked why I was called Ms. Franck; I explained that I had reached her number in error and indicated that was why I asked her to excuse my call. Ms. Hilton explained that she is working on the reports, school will be out next week so she'll have more time to devote to completing the CTRs, and Joelle Franck (Respondent) should not be held responsible. Ms. Hilton said she has formed a PAC and has designated people to file CTRs; however, that was not the case when she was a candidate.
Memo to File? No
Entered by: HH
25. **Date and time:** 12/12/16; 2:28 p.m.
Name: Respondent—Joelle Franck
Phone #: 786-385-8237
Summary: I phoned Respondent to conduct a final interview by telephone, and give her an opportunity to respond to the information gathered during the course of the investigation concerning the allegations made in the complaint and reached her voice-mailbox; I identified myself, provided my contact number, requested she return my call regarding the instant case, and again provided my contact number including extension.
Memo to File? No
Entered by: HH
26. **Date and time:** 12/13/16; 1:00 p.m.
Name: Respondent—Joelle Franck
Phone #: 786-385-8237
Summary: I phoned and reached Respondent; I reviewed my findings with Respondent noting it appears she was never informed by the filing officer to complete amendments or that any reports had not been filed. Respondent said she was Ms. Hilton's campaign treasurer in 2010, "kept on top" of all filings, and believes every financial transaction was accounted for; however, in 2015, Ms. Hilton held on to the records and Respondent did not know what was happening during the campaign and that really upset her. Respondent said she urged Ms. Hilton to file reports by the due dates and Ms. Hilton agreed; however, Ms. Hilton did not meet deadlines for filing CTRs on several occasions.

Respondent said she and Ms. Hilton discussed and worked together to amend a report and Ms. Hilton informed Respondent that the report was filed. She is uncertain which report was amended and filed as she did not sign the summary page; it appears the candidate added Respondent's signature with Respondent's permission after the candidate completed the report. Respondent said she did not review the completed amended report. I identified the report cover period for the amended 2015 M2 Report, February 1, 2015 through February 28, 2015. I explained that the 2015 M2 Report had entries for March 2015, and there was only one contribution entry dated February 1, 2015, sequence number 1. I noted it appears the 2015 M3 Report was not amended and filed with the city clerk's office since I have requested the clerk's staff provide copies of any subsequent filings during the

EXHIBIT 13 (7 of 8)

investigation including the amended 2015 M3 Report (as recent as today), and have not received copies of additional filings.

Respondent said Ms. Hilton called her last night, let Respondent know she had spoken with me, indicating she will complete the reports while she is out of school during the two-week break; I requested Respondent inform me if she is notified by Ms. Hilton that additional reports have been filed or amended; Respondent agreed to let me know. I verified Respondent's correct mailing address is on file with this office and urged her to respond to my ROI and legal staff's SR. I indicated the next meeting of the Commission will be February 2017, and she will receive a NOH indicating the date, time and location for the meeting in Tallahassee whenever the case is placed on the Commission's agenda—February 2017 or some later meeting.

Respondent asked what was "the worst thing that could happen" to her; I explained that the Commission may find no probable cause to believe she violated Florida's election laws, or the Commission may find probable cause and a civil penalty up to \$1,000.00 per violation may be imposed by the Commission; however, I'm uncertain what the Commission may order. I also let Respondent know that a judgment may be obtained against her and a lien placed against her property if the Commission imposes a civil penalty that remains unpaid.

Memo to File? No

Entered by: HH

27. **Date and time:**

Name:

Phone #:

Summary:

Memo to File? No

Entered by:

28. **Date and time:**

Name:

Phone #:

Summary:

Memo to File? No

Entered by:

29. **Date and time:**

Name:

Phone #:

Summary:

Memo to File? No

Entered by:

30. **Date and time:**

Name:

Phone #:

Summary:

EXHIBIT 13 (8 of 8)



FLORIDA ELECTIONS COMMISSION

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

May 17, 2016

Joelle Franck
181 NW 110th Street
Miami Shores, FL 33168

RE: Case No.: FEC 15-359; Respondent: Joelle Franck – AMENDED LETTER OF LEGAL SUFFICIENCY

Dear Ms. Franck:

On December 16, 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 Beverly Hilton, a 2015 candidate for the North Miami City Council, District 4, failed to timely make necessary amendments to the campaign's 2015 M2 (covering the period February 1, 2015 - February 28, 2015) campaign treasurer report, as alleged in the complaint.

Section 106.19(1)(c), Florida Statutes: Respondent, treasurer for Beverly Hilton, a 2015 candidate for the North Miami City Council, District 4, may have falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, when she failed to file the campaign's report covering the period March 1, 2015¹ through May 31, 2015, as alleged in the complaint.

¹ The narrative of the original complaint referenced "the periods of April 4, through May 30th 2015." The narrative did not specifically reference the report covering the period March 1 - March 31, 2015 (the 2015 M3 Report). However, included as an attachment to the complaint is a copy of the campaign's 2015 M3 Report, indicating Complainant's intent to include that report in the complaint. As such, the Commission staff will investigate this report, as well as the M4 and M5 Reports, which together cover the time period between April 1 and May 31, 2015.

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.

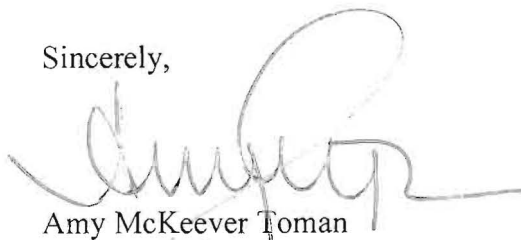
At any time before a probable cause finding, you may notify us in writing that you want to enter into negotiations directed towards reaching a settlement via consent agreement.

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 **Helen Hinson**, the investigator assigned to this case.

Sincerely,



Amy McKeever Toman
Executive Director

AMT/enr



FLORIDA ELECTIONS COMMISSION

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

April 22, 2016

Joelle Franck
181 NW 110th Street
Miami Shores, FL 33168

RE: Case No.: FEC 15-359; Respondent: Joelle Franck

Dear Ms. Franck:

On December 16, 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 Beverly Hilton, a 2015 candidate for the North Miami City Council, District 4, failed to timely make necessary amendments to the campaign's 2015 M2 (covering the period February 1, 2015 - February 28, 2015) campaign treasurer report, as alleged in the complaint.

Sections 106.19(1)(c), Florida Statutes: Respondent, treasurer for Beverly Hilton, a 2015 candidate for the North Miami City Council, District 4, may have falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, when she failed to file the campaign's report covering the period April 1, 2015 - May 30, 2015, 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.

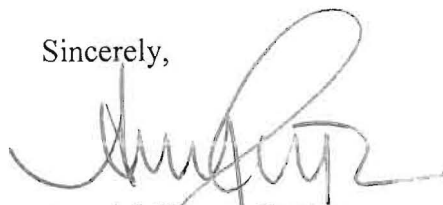
At any time before a probable cause finding, you may notify us in writing that you want to enter into negotiations directed towards reaching a settlement via consent agreement.

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 **Helen Hinson**, the investigator assigned to this case.

Sincerely,



Amy McKeever Toman
Executive Director

AMT/enr



FLORIDA ELECTIONS COMMISSION

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

December 21, 2015

Beverly Hilton
455 NW 121st Street
North Miami, FL 33168-3532

RE: Case No.: FEC 15-359

Dear Ms. Hilton:

Please be advised that you are no longer a named Respondent in this case. If you have any questions, please contact us at fec@myfloridalegal.com, or at the telephone number listed above.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy McKeever Toman".

Amy McKeever Toman
Executive Director

AMT/dam



City of North Miami Office of the City Clerk
 776 NE 125 Street | North Miami | Florida | 33161
 Office: 305.895.9815 Fax: 305.899.0497

2015 DEC 16 A 9:58

ER

Michael A. Etienne, Esquire
 North Miami Elected City Clerk

December 10, 2015

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

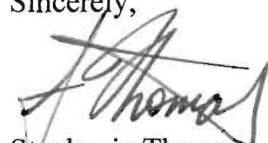
Dear Ms. Toman:

I am in receipt of your letter dated December 4th regarding case number FEC 15-359 indicating that the complaint was directed to the incorrect party.

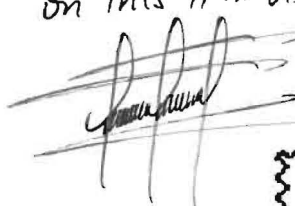
Please accept this letter to amend the name for this case. The correct name for this complaint should be the appointed campaign treasurer, Joelle Franck. A copy of the appointment of campaign treasurer and designation of campaign depository for candidates report is attached for your review.

If additional information is required, please feel free to contact our office.

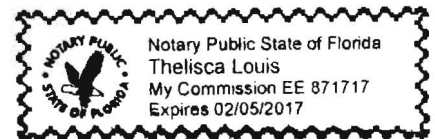
Sincerely,


 Stephanie Thomas
 Deputy City Clerk

Enclosure

For the signature of Stephanie Thomas whom I personally know on this 11th day of December 2015


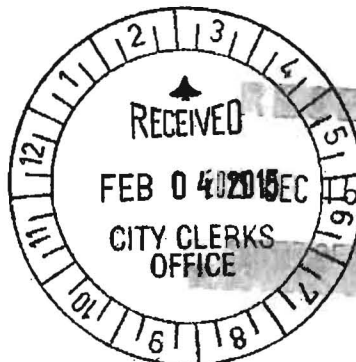
City of North Miami Office of the City Clerk



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

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

(PLEASE PRINT OR TYPE)



OFFICE USE ONLY

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

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)

Beverly Hilton

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

12495 NW 6th Avenue, N. Miami, FL 33168

4. Telephone

(786) 553-8555

5. E-mail address

hiltonmiam@aol.com

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

City Council, District 4

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 Democrat Party candidate.

I have appointed the following person to act as my Campaign Treasurer Deputy Treasurer

10. Name of Treasurer or Deputy Treasurer

Joelle Franck

11. Mailing Address

181 NW 110th Street

12. Telephone

(786) 385-8237

13. City

Miami Shores

14. County

Miami-Dade

15. State

FL

16. Zip Code

33168

17. E-mail address

mshoa36@aol.com

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

19. Name of Bank

Bank of America

20. Address

990 NE 125th Street

21. City

North Miami

22. County

Dade

23. State

FL

24. Zip Code

33161

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

02/02/2015

26. Signature of Candidate

X Beverly Hilton

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

I, Joelle Franck, do hereby accept the appointment
(Please Print or Type Name)

designated above as: Campaign Treasurer Deputy Treasurer.

02/02/2015

Date

X

Joelle Franck
Signature of Campaign Treasurer or Deputy Treasurer

STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION

107 West Gaines Street, Suite 224, Tallahassee, Florida 32399-1050
Telephone Number: (850) 922-4539
www.fec.state.fl.us

RECEIVED
2015 MAY 26 A 11:06

CONFIDENTIAL COMPLAINT FORM

The Commission's records and proceedings in a case are confidential until the Commission rules on probable cause. A copy of the complaint will be provided to the person against whom the complaint is brought.

1. PERSON BRINGING COMPLAINT:

Name: Stephanie Thomas Work Phone: (305) 8959817
Address: 776 NE 125th Street Home Phone: ()
City: North Miami County: Miami Dade State: FL Zip Code: 33161

2. PERSON AGAINST WHOM COMPLAINT IS BROUGHT:

A person can be an individual, political committee, committee of continuous existence, political party, electioneering communication organization, club, corporation, partnership, company, association, or any other type of organization. (If you intend to name more than one individual or entity, please file multiple complaints.)

Name of individual or entity: Beverly Hilton
Address: 12495 NW 2nd Ave. Phone: (786) 5538555
City: North miami County: Miami Dade State: FL Zip Code: 33168

If individual is a candidate, list the office or position sought: Mayor of City North Miami

Have you filed this complaint with the State Attorney's Office? (check one) Yes No

3. ALLEGED VIOLATION(S):

Please list the provisions of The Florida Election Code that you believe the person named above may have violated. The Commission has jurisdiction only to investigation the following provisions: **Chapter 104, Chapter 106, and Section 105.071, Florida Statutes.** Also, please include:

- ✓ The facts and actions that you believe support the violations you allege,
- ✓ The names and telephone numbers of persons you believe may be witnesses to the facts,
- ✓ A copy or picture of the political advertisements you mention in your statement,
- ✓ A copy of the documents you mention in your statement, and
- ✓ Other evidence that supports your allegations.

Mrs. Beverly Hilton, candidate for the post of council district 4 on the May 12, 2015 City of North Miami election has filed her campaign report for the period 3/10/2015; covering the periods of 2/1/2015 through 2/28/2015. However, after careful review of the report it was determined that the report was incomplete. In several occasions the office attempted to have Mrs. Beverly corrected the discrepancies, but never complied. In addition, She still does not file her campaign report for the period of May 10 Or 11, covering the periods of April 4, through May 30th 2015. See attached documents.


Additional materials attached (check one)? Yes No

4. OATH

STATE OF FLORIDA

COUNTY OF Miami-Dade

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

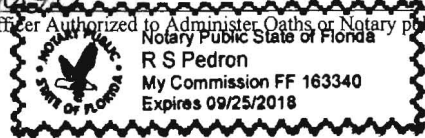

Original Signature of Person Bringing Complaint

2015 MAY 26 A 11:07
ELECTRONIC CERTIFICATION

Sworn to and subscribed before me this 20th day of _____, 20 15



Signature of Officer Authorized to Administer Oaths or Notary public.
Notary Public State of Florida



Signature only.
(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally known Or Produced Identification _____

Type of Identification Produced _____

Any person who files a complaint while knowing that the allegations are false or without merit commits a misdemeanor of the first degree, punishable as provided in Sections 775.082 and 775.083, Florida Statutes.



City of North Miami Office of the City Clerk
776 NE 125 Street | North Miami | Florida | 33161
Office: 305.895.9815 Fax: 305.899.0497

Michael A. Etienne, Esquire
North Miami Elected City Clerk

April 20, 2015

Certified Mail Article number 70141200000023243108

Ms. Beverly Hilton
12495 NW 2nd Avenue
North Miami, FL 33168

Dear Ms. Hilton:

As of today, we have not received the updated information on the Campaign Treasurer's Report Summary requested on April 8th sent by email. (Please see attached).

The deadline to complete this request is Friday, April 25, 2015, at noon. Otherwise, this reporting will be considered "incomplete" with possible consequences thereafter.

Thank you in advance for your prompt attention to this matter. Should you have any questions, please feel free to contact the Office of the City Clerk.

Sincerely,

Stephanie Thomas
Deputy City Clerk/Supervisor of Elections

Enclosures

City of North Miami Office of the City Clerk

Thomas, Stephanie

From: hiltonmiam@aol.com
Sent: Wednesday, April 08, 2015 2:37 PM
To: Thomas, Stephanie
Subject: Re: Important;.....Incomplete Campaign Treasure's Reports

Thanks Ms. Thomas, will do.

Beverly Hilton

-----Original Message-----

From: Thomas, Stephanie <sthomas@northmiamifl.gov>
To: Beverly Hilton (hiltonmiam@aol.com) <hiltonmiam@aol.com>
Cc: Etienne, Michael <metienne@northmiamifl.gov>; Louis, Thelisca <lthelisca@northmiamifl.gov>
Sent: Wed, Apr 8, 2015 10:21 am
Subject: Important;.....Incomplete Campaign Treasure's Reports

Good morning Ms. Hill,

After careful review of all the Campaign Treasurer's Summary Report turned in to date, there are a few that are incomplete. The itemized expenditure, contributor and distribution report section needs to be completed in its entirety. I have provided the link for your reference of the documents received and requires your immediate attention: http://www.northmiamifl.gov/departments/city_clerk/elections/2015.aspx

Please provide the completed contribution, itemized expenditure and distributions report for the following period:


- 2/1/15 – 2/28/15 – need complete address for all names provided

If you have any questions, please feel free to contact our office. Thank you in advance for your attention.



Stephanie S. Thomas
Deputy City Clerk

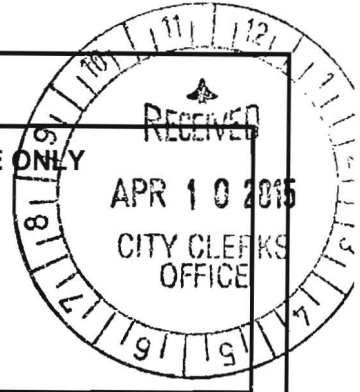
Office of the City Clerk
776 NE 125 Street
North Miami, FL 33161
305-895-9814 Direct Line
305-893-6511 Ext. 12145
305-895-0497 Fax
<http://www.northmiamifl.gov>



Please print only if necessary

The City of North Miami is a public entity subject to Chapter 119 of the Florida Statutes concerning public records. E-mail messages are covered under such laws and thus subject to disclosure. All E-mail sent and received is captured by our servers and kept as a public record.

CAMPAIGN TREASURER'S REPORT SUMMARY



(1) Beverly Hilton
 Name
 (2) 12495 NW 2nd Avenue
 Address (number and street)
North Miami, FL 33168
 City, State, Zip Code

OFFICE USE ONLY

(3) ID Number: 94

(4) Check appropriate box(es):
 Candidate Office Sought: North Miami City Council, District 4
 Political Committee (PC)
 Electioneering Communications Org. (ECO) Check here if PC or ECO has disbanded
 Party Executive Committee (PTY) Check here if PTY has disbanded
 Independent Expenditure (IE) (also covers an individual making electioneering communications) Check here if no other IE or EC reports will be filed

(5) Report Identifiers

Cover Period: From 03 / 01 / 15 To 03 / 31 / 15 Report Type: _____
 Original Amendment Special Election Report

(6) **Contributions This Report**

Cash & Checks \$ 2,745.
 Loans \$ 1,200.
 Total Monetary \$ 3,945.
 In-Kind \$ 350.

(7) **Expenditures This Report**

Monetary Expenditures \$ 3,505.36
 Transfers to Office Account \$ _____
 Total Monetary \$ 3,505.36

(8) **Other Distributions**
 \$ 350.

(9) **TOTAL Monetary Contributions To Date**
 \$ 8,170.

(10) **TOTAL Monetary Expenditures To Date**
 \$ 6,317.37

(11) Certification

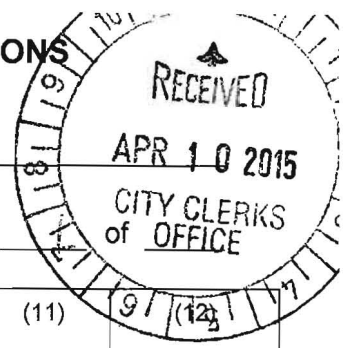
It is a first degree misdemeanor for any person to falsify a public record (ss. 839.13, F.S.)

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

(Type name) Joelle Franck
 Individual (only for IE or electioneering comm.) Treasurer Deputy Treasurer
X Joelle Franck
 Signature

(Type name) Beverly Hilton
 Candidate Chairperson (only for PC and PTY)
X Beverly Hilton
 Signature

CAMPAIGN TREASURER'S REPORT -- ITEMIZED CONTRIBUTIONS



(1) Name Beverly Hilton

(2) I.D. Number _____

(3) Cover Period 03/11/15 through 03/31/15

(4) Page _____

(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Contributor Type Occupation		(9) Contribution Type	(10) In-kind Description	(11) Amendment	(11) Amount
3/16/15	Barbara Bush 1780 NE 138th N. Miami Beach, FL	I	Retired	CAS			20.00
1							
3/18/15	CHRISTINA 435 NW 124 St	I	Retired	CHE			300.00
2							
3/27/15	BETS HEW BOATS 12565 NW 7th	B	Business Owner	CHE			100-
3							
3/24/15	Royal Cleaners	B	Business Owner	CHE			150-
4							
3/24/15	N. Miami Cleaners	B	Business Owner	CHE			150
5							
3/29/15	Immacula & Kame	I		CAS			75-
6							
3/18/15	Toelle Frende	I	CEO Nurse	CAS			500
7							

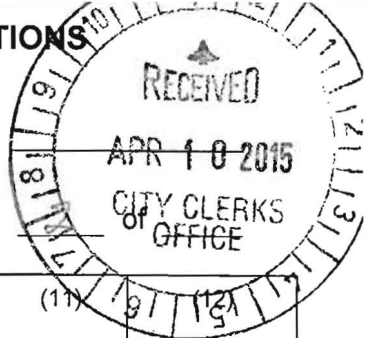
CAMPAIGN TREASURER'S REPORT - ITEMIZED CONTRIBUTIONS

(1) Name Beverly Hilton

(2) I.D. Number _____

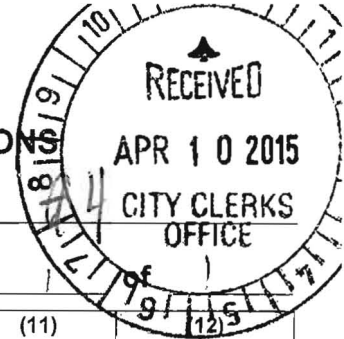
(3) Cover Period 3/1/15 through 3/31/15

(4) Page _____



(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Contributor Type Occupation		(9) Contribution Type	(10) In-kind Description	(11) Amendment	Amount
(6) Sequence Number		Type	Occupation	Type	Description		
03/18/15	Jean Frouge	I	Rest. Manager	CAS			\$500.00
9							
3/16/15	Phillip Scott 12495 NW 6 Ave N. Miami 33168	I	Student	CAS			100.00
10							
3/25/15	Jean Jacques 12630 NE 1st St N. Miami 33168	I		INR	Walk List Telephone Driver		\$350.00
11							
3/15/15	Paula Jaine 6 Oak Cam Jeanette N.W. 10583	I	Actress	MO			\$800
12							
3/11/15	Volanda Campbell 400 NW 123 St N Miami 33168	I	Retired	CAS			\$150
13							
3/15/15	Beverly Hilton 12495 NW 6 Ave	B	B/OWNER				1200
14							
1							
1							

CAMPAIGN TREASURER'S REPORT - ITEMIZED DISTRIBUTION



(1) Name Beverly Hilton (2) I.D. Number _____

(3) Cover Period 3-1-15 through 3-31-15 (4) Page _____

(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Purpose (add office sought if contribution to a candidate)	(9) Related Expenditures	(10) Amendment	(11) Amount	Distribution Type
3/10/15 1	William Green	Manager Campaign	transfer		\$7000	OK
3/26/15	William Green	H. Staff	Walt list		\$250.00	\$250.00
1 / 1						
1 / 1						
1 / 1						
1 / 1						
1 / 1						
1 / 1						

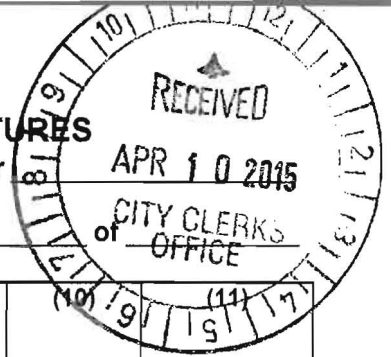
CAMPAIGN TREASURER'S REPORT - ITEMIZED EXPENDITURES

(1) Name Beverly Hilton

(2) I.D. Number _____

(3) Cover Period _____ through _____

(4) Page _____

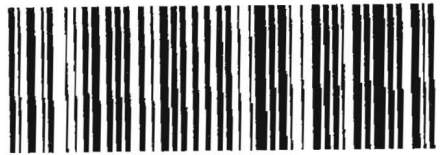


(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Purpose (add office sought if contribution to a candidate)	(9) Expenditure Type	(10) Amendment	(11) Amount
3/17/15 1	Shell 12500 NW 7AVE N. Miami FL 33168	TRAVEL GAS	Gas		40 -
3/21/15 2	Maria Max 12255 Biscayne Blvd N. Miami, FL 33181	Office Supplies	Clipboard		6.39
3/21/15 3	Office Max 12255 Biscayne	?	Printing		37.21
3/19/15 4	Simon Prunty 2321 Pembroke Rd Hollywood, FL 33020	Palm Cards Printing Sup.	Palm Cards		524.70
3/21/15 5	Wm Dore Staus 7th Avenue	Food	Drafts		16.38
3/21/15 6	HAPPY Ending of Miami 651 - N M 106 Street N. Miami, FL 33180	Conduct T-Shirts	T-shirt		339.75
3/24/15 7	Burger King 128 Street of N West 7th Avenue N. Me	Feed work	meal		55.93
3/26/15 8	Easy Rental 12550 N WAVE N. Miami 33168	Office Furniture Campaign Office	Furniture		240.00



City of North Miami, Florida
Office of the City Clerk
776 NE 125 Street
North Miami, FL 33161
407001

CERTIFIED MAIL™



7013 3020 0001 9451 4749

Ms. Beverly Hilton
12495 NW 2nd Avenue
North Miami, FL 33168



U.S. POSTAGE PITNEY BOWES
ZIP 33161 \$ 006.48⁰
02 1W
0001387095 APR 21 2015

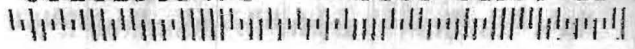
NISN

NIXIE 333 DE 1009 0005/05/15

RETURN TO SENDER
NO SUCH NUMBER
UNABLE TO FORWARD

BC: 33161565476 *0806-01373-22-00

0018834402658



PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ms. Beverly Hilton
12495 NW 2nd Ave
North Miami, FL 33168

2. Article Number
(Transfer from service label)

7013 3020 0001 9451 4749

PS Form 3811, July 2013

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Agent

Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

3. Service Type

Certified Mail®

Priority Mail Express™

Registered

Return Receipt for Merchandise

Insured Mail

Collect on Delivery

4. Restricted Delivery? (Extra Fee)

Yes

Domestic Return Receipt