STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION

In Re: Andrew Brett **Case No.: FEC 22-185**

_____/

TO: Andrew Brett
739 NW 2nd Avenue
Ft. Lauderdale, FL 33311

Richard DeNapoli
c/o Coral Gables Trust, 401 E. Las Olas Blvd., # 1510
Ft. Lauderdale, FL 33301

NOTICE OF HEARING (INFORMAL HEARING)

A hearing will be held in this case before the Florida Elections Commission on, **August 15, 2023 at 8:30 a.m.,** *or as soon thereafter as the parties can be heard*, at the following location: **Virtual Meeting via GoTo Webinar:**

WEB PARTICIPATION: https://attendee.gotowebinar.com/register/4391393799096818270
AUDIO PARTICIPATION: 1 877 309 2074 ATTENDEE ACCESS CODE: 424-284-031

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.

Tim Vaccaro
Executive Director
Florida Elections Commission
August 1, 2023

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

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

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

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

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

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

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

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5 JUN '23 PM 3:14

STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION

Florida Elections Commission,
Petitioner,

Case No.: FEC 22-185

v.

Andrew Brett,
Respondent.
_____/

ORDER OF PROBABLE CAUSE

THIS MATTER was heard by the Florida Elections Commission (Commission) at its regularly scheduled meeting on May 16, 2023, in Tallahassee, Florida.

On January 11, 2023, 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 about August 14, 2020, Andrew Brett violated Section 106.0702(1), Florida Statutes, when he failed to timely file his campaign treasurer's report due on the 4th day immediately preceding the primary election.

Count 2:

On or around August 14, 2020, Andrew Brett violated Section 106.19(1)(b), Florida Statutes, when he failed to report contributions required to be reported by Chapter 106, Florida Statutes, on the campaign treasurer's report due on the 4th day immediately preceding the primary election.

Count 3:

On or around August 14, 2020, Andrew Brett violated Section 106.19(1)(c), Florida Statutes, when he deliberately failed to include information required by Chapter 106, Florida Statutes, on the campaign treasurer's report due on the 4th day immediately preceding the primary election.

DONE AND ORDERED by the Florida Elections Commission on May 16, 2023.

Tim Vaccaro, J.D., Executive Director
For Joni Alexis Poitier, Vice Chair
Florida Elections Commission

Copies furnished to:
Stephanie J. Cunningham, General Counsel
Andrew Brett, Respondent
Richard DeNapoli, 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: Andrew Brett **Case No.: FEC 22-185**

_____/

TO: Andrew Brett
739 NW 2nd Avenue
Ft. Lauderdale, FL 33311

Richard DeNapoli
c/o Coral Gables Trust
401 E. Las Olas Blvd., # 1510
Ft. Lauderdale, FL 33301

NOTICE OF HEARING (PROBABLE CAUSE DETERMINATION)

A hearing will be held in this case before the Florida Elections Commission on, **May 16, 2023 at 8:30,** *or as soon thereafter as the parties can be heard*, at the following location: **Join Zoom Meeting:**
https://us06web.zoom.us/meeting/register/tZMpdumuqTsqGt1MNuvpQBOl5XPapAI_9zfC

Audio Participation:	Meeting ID:	Passcode:
Dial: 1 301 715 8592	874 1067 0009	772737

After registering, you will receive a confirmation email containing information about joining the meeting.

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See further instructions on the reverse side.

Tim Vaccaro
Executive Director
Florida Elections Commission
May 2, 2023

NOH
FEC # 22-185

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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.

Florida Elections Commission

107 West Gaines Street, Suite 224 Tallahassee, Florida 32399-1050
Telephone: (850) 922-4539 · Facsimile: (850) 921-0783
FEC@myfloridalegal.com · www.fec.state.fl.us

February 23, 2023

Andrew Brett
739 NW 2nd Avenue
Fort Lauderdale, Florida 33311

RE: Case No.: FEC 22-182; FEC 22-185; Respondent: Andrew Brett

Dear Mr. Brett:

During our most recent telephone conversation we discussed the possibility of filing a campaign treasurer's report to disclose the financial activity that took place during your 2020 campaign. Should you wish to do so, you will need to contact your filing officer at:

Claudette Hamilton
chamilton@BrowardVotes.gov
954-712-1961
115 S. Andrews Ave.
Room 102
Ft. Lauderdale, Florida 33301

In consideration of a potential settlement, I have enclosed an Affidavit of Financial Support. If you choose to complete the affidavit, it will be used by staff to determine an appropriate settlement amount. Additionally, it will be used by the Commission in the event that a civil penalty is imposed in either of your cases. Please be aware that when received by my office, this document will become a public record once your case is no longer confidential.

Please let me know if you have any further questions.

Sincerely,
Stephanie J. Cunningham
General Counsel

Enclosure: Affidavit of Financial Support

AFFIDAVIT OF FINANCIAL SUPPORT

I, _____, Respondent in FEC Case No. _____, state:

1. **I have _____dependents.** *(Do not include children not living at home and do not include a working spouse or yourself.)*

2. **I have a take home income of $_____** paid: ( ) weekly ( ) every two weeks ( ) semi-monthly ( ) monthly ( ) yearly
(Take home income equals salary, wages, bonuses, commissions, allowances, overtime, tips and similar payments, ***minus*** *deductions required by law and other court-ordered support payments.)*

3. **Place of Employment***:* _____

Address: _____
_____

4. **I have other income** paid: ( ) weekly ( ) every two weeks ( ) semi-monthly ( ) monthly ( ) yearly.

(Circle "Yes" and fill in the amount if you have this kind of income, otherwise circle "No")

Social Security benefits?	YES or NO	$
Veterans' benefits?	YES or NO	$
Unemployment compensation?	YES or NO	$
Child support or regular support from family members/spouse?	YES or NO	$
Union funds?	YES or NO	$
Workers compensation?	YES or NO	$
Rental income?	YES or NO	$
Retirement/ Pensions?	YES or NO	$
Dividends or interest?	YES or NO	$
Trusts/ Gifts?	YES or NO	$
Any other income not on the list?	YES or NO	$

5. **I have other assets:** *(Circle "yes" and fill in the value of the property, otherwise circle "No"; use the back to provide additional information)*

Cash?	YES or NO	$
Savings?	YES or NO	$
Bank account(s)?	YES or NO	$
Stocks/ Bonds?	YES or NO	$
Money market accounts?	YES or NO	$
a. Certificates of deposit or Equity* in real estate (excluding homestead) *if yes, please list the address of this property below.*	YES or NO	$
b. Equity* in motor vehicles/boats/other tangible property expectancy in an interest in such property? *) if yes, please list the information for this property below.*	YES or NO	$

*Equity means value minus loans.

a. Address: _____

b. List the year/make/model & tag#: _____

_____

Check one: I ( ) DO ( ) DO NOT expect to receive more assets in the near future. The asset is _____.

6. **I have total liabilities and debts of $_____** as follows:

Home $	Other Real Property $
Motor Vehicle $	Credit Cards $
Medical bills $	Costs of medicine $
Child Support paid direct $	Other $

7. **I have a private lawyer in this case**…… Yes _____ No _____

8. **I receive:** *(Circle "Yes" or "No")*

Temporary Assistance for Needy Families – Cash Assistance Yes No
Poverty-related Veterans' Benefits Yes No
Supplemental Security Income (SSI) Yes No

STATE OF FLORIDA
COUNTY OF _____

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

_____

Signature of Respondent

Sworn to and subscribed before me this _____ day of

_____, 20_____.

_____

Signature of Officer Authorized to Administer Oaths or Notary public.

_____

(Print, Type, or Stamp Commissioned Name of Notary Public

Personally Known _____ Or Produced Identification _____
Type of Identification Produced _____

STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION

In Re: Andrew Brett **Case No.: FEC 22-185**

_____/

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 **Sections 106.0702(1), 106.19(1)(b),** and **106.19(1)(c), Florida Statutes**. Based upon a thorough review of the Report of Investigation submitted on October 27, 2022, the following facts and law support this staff recommendation:

1. On August 4, 2022, the Florida Elections Commission ("Commission") received a sworn complaint from Richard DeNapoli ("Complainant"), alleging that Andrew Brett ("Respondent") violated Chapter 106, Florida Statutes.

2. Respondent was a 2020 candidate for Broward Republican State Executive Committeeman. (ROI Exhibit 3, page 1)[1]

3. By letter dated September 14, 2022, the Executive Director notified Respondent that Commission staff would investigate the following statutory provisions:

> **Section 106.0702(1), Florida Statutes:** Respondent, a 2020 candidate for Republican State Committeeman, failed to file a report due on the 4th day immediately preceding the primary election of all contributions received and all expenditures made.
>
> **Section 106.19(1)(b), Florida Statutes:** Respondent, a 2020 candidate for Republican State Committeeman, may have failed to report one or more contributions required to be reported by Chapter 106, Florida Statutes, in a report due on the 4th day immediately preceding the primary election, as alleged in the complaint.
>
> **Section 106.19(1)(c), Florida Statutes:** Respondent, a 2020 candidate for Republican State Committeeman, may have falsely reported or deliberately failed to include information in a report due on the 4th day immediately preceding the primary election of all contributions received and all expenditures made, as required by Chapter 106, Florida Statutes, as alleged in the complaint.

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

4. Respondent did not file any forms or reports with his filing officer, the Broward County Supervisor of Elections, outside of the Candidate Oath. Therefore, the filing officer did not provide campaign materials to Respondent. (ROI Exhibit 2; ROI Exhibit 4, page 1)

Alleged Violation: Section 106.0702(1), Florida Statutes

5. Complainant alleged that Respondent violated Florida's election laws by failing to timely file his campaign treasurer's report. Complainant provided screenshots of emails and social media posts suggesting that Respondent was accepting contributions and making expenditures which triggered a duty to report. (ROI Exhibits 5-10)

6. Section 106.0702(1), Florida Statutes, provides that, "[a]n individual seeking a publicly elected position on a political party executive committee who receives a contribution or makes an expenditure shall file a report of all contributions received and all expenditures made. The report shall be filed on the 4th day immediately preceding the primary election."

7. The 2020 election for Broward Republican State Executive Committeeman took place on August 18, 2020. (ROI Exhibit 1, page 1)

8. Respondent admitted that he received contributions and made expenditures. (ROI Exhibit 4, page 4) Respondent provided a list of campaign contributors with corresponding amounts and descriptions. (ROI Exhibit 11)

9. Joe Scott, Broward County Supervisor of Elections, served as Respondent's filing officer. Mr. Scott attested that Respondent did not file a campaign treasurer's report for his 2020 campaign. (ROI Exhibit 2, page 1)

10. Claudette Hamilton, Municipal Liaison, Broward County Supervisor of Elections, stated that candidates for state executive committeeman typically do not file an Appointment of Campaign Treasurer and Designation of Campaign Depository for Candidates form ("DS-DE 9") since they do not usually campaign for office. Ms. Hamilton stated that staff informs each candidate when they sign their Candidate Oath that they are required to file a DS-DE 9 if they plan on campaigning or collecting contributions. (ROI Exhibit 4, page 1)

11. Respondent stated that he was told that he did not have to file a campaign treasurer's report if his contributions did not exceed $5,000. Respondent could not provide the source of the advice. Respondent stated that he did not confirm with his filing officer the accuracy of the advice. (ROI Exhibit 4, page 4)

12. Respondent failed to timely file his campaign treasurer's report due on the 4th day immediately preceding the primary election.

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

13. Complainant alleged that Respondent violated Florida's election laws by failing to report contributions required to be reported by Chapter 106, Florida Statutes. Complainant

provided screenshots of social media posts suggesting that Respondent was accepting contributions. (ROI Exhibits 5-7 & 9)

14. Respondent stated that he did not open a campaign account, but rather used his personal account. (ROI Exhibit 4, page 4) Therefore, Commission staff did not obtain and analyze bank records with regard to this alleged violation. However, Commission staff's investigation produced other evidence showing that Respondent failed to report contributions.

15. Social media posts authored by Respondent contained the following statements: "YOUR financial help and support will enable me to prevail to become your new State Committeeman in Broward County. . . . 'time is of the essence' as we have VERY LITTLE TIME to raise funds . . . . Whatever amount of money you can donate to help fund my campaign is deeply appreciated. Please make your campaign donations out to 'Brett for Florida' and mail them to: . . . ." (ROI Exhibit 5) "THANK YOU FOR THE HUGE DONATION!! YOU KNOW WHO YOU ARE . . . ." (ROI Exhibit 6, page 1) "THANK YOU TO THOSE WHO ARE SENDING IN DONATIONS FOR MY CAMPAIGN . . . . EVERY DOLLAR HELPS . . . . PLEASE IF YOU CAN $5 $10 $1000[,] MAKE CHECKS PAYABLE TO: BRETT FOR FLORIDA . . . ." (ROI Exhibit 7) "IF ALL WHO LIKED OR COMMENTED WOULD TAKE A MOMENT AND DONATE $5.00 OR MORE TO MY CAMPAIGN FOR A FINAL MEDIA PUSH THIS COMING WEEKEND! https://www.brettforflorida.com/donate.html." (ROI Exhibit 9) Commission staff was unable to ascertain the date of each post; however, two of the posts contain dates of June 11, 2020, and August 9, 2020. (ROI Exhibit 6, page 1; ROI Exhibit 9)

16. Additionally, Respondent admitted that he received $1,100 in monetary contributions and $600 in in-kind contributions and provided a list of campaign contributors with corresponding amounts and descriptions. (ROI Exhibit 4, page 4; ROI Exhibit 11) The list provided by Respondent shows contributions totaling $2,845. (ROI Exhibit 11)

17. Joe Scott, Broward County Supervisor of Elections, served as Respondent's filing officer. Mr. Scott attested that Respondent did not file a campaign treasurer's report for his 2020 campaign. (ROI Exhibit 2, page 1)

18. Respondent failed to report contributions required to be reported by Chapter 106, Florida Statutes, on the campaign treasurer's report due on the 4th day immediately preceding the primary election.

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

19. Complainant alleged that Respondent violated Florida's election laws by falsely reporting or deliberately failing to include information required by Chapter 106, Florida Statutes. Complainant provided screenshots of emails and social media posts suggesting that Respondent was accepting contributions and making expenditures. (ROI Exhibits 5-10)

20. Respondent stated that he did not open a campaign account, but rather used his personal account. (ROI Exhibit 4, page 4) Therefore, Commission staff did not obtain and analyze

bank records with regard to this alleged violation. However, Commission staff's investigation produced other evidence showing that Respondent failed to report contributions and expenditures.

21. With regard to Respondent's deliberate failure to report contributions, see the analysis in paragraphs 15-16, above.

22. With regard to Respondent's deliberate failure to report expenditures, Commission staff obtained a social media post by Marlene Marin wherein she stated that Respondent ordered campaign shirts. (ROI Exhibit 8, page 1) Respondent made a social media post appearing to relate to Ms. Marin's post wherein he stated that the shirts were intended to be an in-kind contribution, but that Ms. Marin later stated that they cost $200. (ROI Exhibit 8, page 2)

23. Commission staff reviewed a video posted by Respondent wherein he stated, "Yes, I bought political t-shirts from Marlene Marin. She has been paid, period." (ROI, p. 3, ¶10) Commission staff was unable to reach Ms. Marin to confirm that the expenditure was made. (ROI Exhibit 4, pages 2-3) Respondent stated that he paid for the t-shirts by reimbursing Ryan Murphy who Ms. Marin alleged paid $100 towards the cost. (ROI Exhibit 4, page 4; ROI Exhibit 8, page 1) Commission staff was unable to reach Ryan Murphy to confirm the expenditure was reimbursed. (ROI Exhibit 4, page 2)

24. Commission staff obtained screenshots and emails relating to a video "DeNapoli – Lying, Denying and Falsifying!!" appearing to be produced by Respondent and circulated on August 4, 2020. (ROI Exhibit 10) Respondent admitted that he expended $250 for the original video production and $250 to revise the video. He also stated that he paid for signs and tickets to Broward County Republican Party events. (ROI Exhibit 4, pages 3-4)

25. Joe Scott, Broward County Supervisor of Elections, served as Respondent's filing officer. Mr. Scott attested that Respondent did not file a campaign treasurer's report for his 2020 campaign. (ROI Exhibit 2, page 1)

26. Chapter 106, Florida Statutes, requires candidates to report any contributions received and any expenditures made for the purpose of influencing the results of an election. Respondent deliberately failed to include information required by Chapter 106, Florida Statutes, on the campaign treasurer's report due on the 4th day immediately preceding the primary election.

27. "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).

28. The facts set forth above show that Respondent was a 2020 candidate for Broward Republican State Executive Committeeman. Respondent failed to timely file his campaign treasurer's report due on the 4th day immediately preceding the primary election. Respondent failed

to report contributions required to be reported by Chapter 106, Florida Statutes, on the campaign treasurer's report due on the 4th day immediately preceding the primary election. Respondent deliberately failed to include information required by Chapter 106, Florida Statutes, on the campaign treasurer's report due on the 4th day immediately preceding the primary election.

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

Count 1:

On or about August 14, 2020, Andrew Brett violated Section 106.0702(1), Florida Statutes, when he failed to timely file his campaign treasurer's report due on the 4th day immediately preceding the primary election.

Count 2:

On or around August 14, 2020, Andrew Brett violated Section 106.19(1)(b), Florida Statutes, when he failed to report contributions required to be reported by Chapter 106, Florida Statutes, on the campaign treasurer's report due on the 4th day immediately preceding the primary election.

Count 3:

On or around August 14, 2020, Andrew Brett violated Section 106.19(1)(c), Florida Statutes, when he deliberately failed to include information required by Chapter 106, Florida Statutes, on the campaign treasurer's report due on the 4th day immediately preceding the primary election.

Respectfully submitted on January 11, 2023.

Stephanie J. Cunningham
General Counsel

I reviewed this Staff Recommendation this 17th day of January 2023.

Tim Vaccaro
Executive Director

FLORIDA ELECTIONS COMMISSION
REPORT OF INVESTIGATION
Case No.: FEC 22-185

Respondent: Andrew Brett
Counsel for Respondent: N/A

Complainant: Richard DeNapoli
Counsel for Complainant: N/A

On August 4, 2022, the Florida Elections Commission (Commission) received a sworn complaint alleging that Respondent violated Chapter 106, Florida Statutes. Commission staff investigated whether Respondent violated the following statutes:

> Section 106.0702(1), Florida Statutes, failing to file a report due on the 4th day immediately preceding the primary election of all contributions received and all expenditures made;
>
> Section 106.19(1)(b), Florida Statutes, failing to report one or more contributions required to be reported by Chapter 106, Florida Statutes; and
>
> Section 106.19(1)(c), Florida Statutes, falsely reporting or deliberately failing to include information required by Chapter 106, Florida Statutes.

I. Preliminary Information:

1. Respondent was a 2020 candidate for Broward Republican State Executive Committeeman. In the election held on August 18, 2020, Respondent was defeated by Complainant, who was elected to office after receiving 63.83% of the vote in a field of six candidates. Respondent received 6.13% of the vote. To review the election results, refer to Exhibit 1.

2. The Broward County Supervisor of Elections (SOE) was Respondent's filing officer. According to an affidavit from Joe Scott, Broward County SOE, Respondent had not sought office previously within his jurisdiction. According to the affidavit, the SOE did not provide Respondent with a copy of Chapter 106, Florida Statues, or the *Candidate and Campaign Treasurer Handbook.* The affidavit indicated that Respondent did not file an Appointment of Treasurer and Designation of Campaign Depository for Candidates (DS-DE 9) form, or any campaign treasurer reports. To review the affidavit from the filing officer, refer to Exhibit 2.

3. Claudette Hamilton, Municipal Liaison Officer Broward County SOE, stated during a telephone interview that the only thing Respondent filed with their office was the candidate oath. She explained that the Committeeman candidates usually only file the oath unless

they are planning to campaign. Ms. Hamilton stated that the Committeeman candidates are informed verbally when they file the oath that additional forms are required if they plan to campaign or collect contributions. She added that most of the candidates for Committeeman do not campaign. She stated that the forms are available on their website and the Division of Elections website, and if the candidates call or visit the SOE office, staff will email or print the forms for the candidates. Ms. Hamilton added the report for Committeeman candidates is due on the 4th day preceding the primary; therefore, the report for the 2020 primary election was due on August 14, 2020. To review the candidate oath, which was filed on June 8, 2020, refer to Exhibit 3. To review the phone log, refer to Exhibit 4, entries 4 and 11.

II. Alleged Violation of Sections 106.0702(1), 106.19(1)(b), and 106.19(1)(c), Florida Statutes:

4. I investigated whether Respondent violated these sections of the election laws by failing to file a report due on the 4th day immediately preceding the primary election of all contributions received and all expenditures made, failing to report one or more contributions, and falsely reporting or deliberately failing to include information in a report due on the 4th day immediately preceding the primary election.

5. Complainant alleged that Respondent received contributions and made expenditures during his 2020 campaign for Republican State Committeeman but failed to file the report disclosing all contributions received and expenditures made by his campaign. Complainant provided a copy of a Facebook post by Respondent that reads, "Whatever amount of money you can donate to help fund my campaign is deeply appreciated. Please make your campaign donations out to 'Brett for Florida.'" Respondent then specified an address to which contributions should be mailed. To review Facebook post 1, refer to Exhibit 5.

6. Complainant provided a copy of another Facebook post by Respondent dated June 11, 2020. It reads, "THANK YOU FOR YOUR HUGE DONATION!!" Complainant also provided two responses to the post. The first response from Scott Newmark reads, "just tell us. Why make us wait for the public finance reports." The second response from Richard Bryant reads, "Your [sic] welcome but I didn't think I would call $20 huge." Respondent replied to Mr. Bryant by stating, "Thank you Richard I just got your donation today." To review Facebook post 2, refer to Exhibit 6.

7. Complainant provided another Facebook post by Respondent that reads, "THANK YOU TO THOSE WHO ARE SENDING IN DONATIONS FOR MY CAMPAIGN .... EVERY DOLLAR HELPS ... PLEASE IF YOU CAN $5 $10 $1000 MAKE CHECKS PAYABLE TO: BRETT FOR FLORIDA." The post is not dated, but Complainant alleged it was posted on June 16, 2020. To review Facebook post 3, refer to Exhibit 7.

8. Complainant provided a Facebook post by Marlene Marin. The post discusses t-shirts for Respondent's campaign that he allegedly ordered from Ms. Marin, and which were delivered to Respondent's home. Ms. Marin claims in the post that Respondent never paid her for the t-shirts. The post states, "Then I called his partner ryan [sic] who paid me 100 dollars out of his own money so now he still owes me 100." The post encourages the reader not to vote for Respondent. The post is not dated. To review Facebook post 4, refer to Exhibit 8, page 1.

9. Complainant also provided a Facebook post by Respondent that appears to be responding to Ms. Marin's post. The Facebook post reads, "I was advised that the 24 t-shirts were an in kind [sic] contribution and wasn't made aware till 10 minutes till she arrived at my home it was $200. If I knew at the onset—I sure would NOT have moved forward whatsoever!" The post included a screen shot of a $100 electronic transfer to Ms. Marin, though it is unclear from the screen shot who transferred the money to Ms. Marin. The screen shot of the transfer is dated July 9, 2020. To review Respondent's response post, refer to Exhibit 8, page 2.

10. Complainant also provided a digital video of Respondent that was posted on August 5, 2020. I reviewed the video, in which Respondent directly addressed the camera. In the video, Respondent stated, "Yes, I bought political tee-shirts from Marlene Marin. She has been paid, period. She continues to say that she's not paid." I attempted to interview Ms. Marin and Mr. Ryan Murphy by telephone. However, my attempts to reach them were unsuccessful. To review the phone log, refer to Exhibit 4.

11. Complainant also provided a post by Respondent dated August 9, 2020, in which he encouraged the reader to "DONATE $5.00 OR MORE TO MY CAMPAIGN FOR A FINAL MEDIA PUSH THIS COMING WEEKEND!" The post contained a link to a campaign website donation page, though the page is no longer active. To review Facebook post 5, refer to Exhibit 9.

12. Complainant also provided a series of emails and posts, a digital audio file, and three digital video files that, taken together, suggest Respondent either incurred one or more campaign expenditure(s) and/or received one or more in-kind contribution(s) relative to a "documentary" about Complainant that was produced and distributed by Respondent between at least August 4, 2020, and August 17, 2020. The "documentary" was distributed in audio and video forms. It is narrated by someone other than Respondent, contains photos, graphics, and text overlays, and it is approximately ten minutes in length. At the end of the production, the narrator states, "…elect Andrew Russell Brett as your next Broward County State Committeeman. Remember to vote on August 18th." A photo of Respondent is displayed during this narration, followed by a graphic stating, "VOTE! AUGUST 18TH! ANDREW BRETT." To review the emails and posts relating to the production, refer to Exhibit 10.

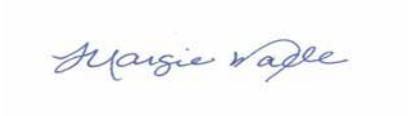
13. On October 26, 2022, I interviewed Respondent, who acknowledged that he received contributions and made expenditures on behalf of his 2020 campaign. According to Respondent, he received $1,100.00 in monetary contributions and an in-kind contribution valued at $600.00. I asked Respondent if he opened a campaign account. Respondent stated that he did not open a campaign account; he just used his personal account. During the interview, Respondent acknowledged that he made the following expenditures: $250.00 for the original video production, $250.00 for a revised version of the video production, $200.00 for campaign t-shirts ($100.00 of which was reimbursed to "Ryan"), and unspecified amounts for signs and few tickets to attend events sponsored by the Broward County Republican Party. To review the phone log, refer to Exhibit 4, entry 14.

14. I asked Respondent why he did not file a report to disclose the financial activity in the campaign. He stated he was told he did not have to file a report if his contributions did not exceed $5,000.00, which they did not. I asked who gave him this advice, and he stated that he did not recall. I asked Respondent if he attempted to verify the advice, and he stated he did not do

anything to verify it. To review the phone log, refer to Exhibit 4, entry 14.

15. Respondent provided an itemized list of contributions, which included the $20.00 contribution from Richard Bryant that was mentioned in Facebook posts. According to the itemized list, Respondent received $1,645.00 in monetary contributions and an in-kind contribution valued at $600.00 for a campaign website. The list also included an expenditure of $600.00 for yard signs. To review the itemized list of contributions, refer to Exhibit 11.

Respectfully submitted on October 27, 2022.



Margie Wade
Investigation Specialist

FLORIDA ELECTIONS COMMISSION
REPORT OF INVESTIGATION
Andrew Brett -- FEC 22-185

LIST OF EXHIBITS	
Exhibits #s	**Description of Exhibits**
Exhibit 1	Election Results
Exhibit 2	Affidavit of Filing Officer
Exhibit 3	Candidate Oath
Exhibit 4	Phone log
Exhibit 5	Facebook Post #1
Exhibit 6	Facebook Post #2
Exhibit 7	Facebook Post #3
Exhibit 8	Facebook Post #4
Exhibit 9	Facebook Post #5
Exhibit 10	Facebook Posts and Emails Relating to Videos
Exhibit 11	Email from Respondent with Contributions

Select Language

Powered by Google Translate (https://translate.google.com)

Primary Election

Election Date: 8/18/2020

(Website last updated at: 09/13/2021 10:25:53 am)

Registered Voters:	**1,222,720**
Ballots Cast:	**317,160**
Voter Turnout:	**25.94%**

Precincts Reporting:	**577 / 577**
Election Day:	**Completely Reported**
Early Votes:	**Completely Reported**
Vote By Mail:	**Completely Reported**

EL45A Report (https://www.browardvotes.gov/Portals/Broward/Documents/results/August-18-2020-Primary-Election/Primary-Election-August-18-2020-EL45A.html)

EL30A Report (https://www.browardvotes.gov/Portals/Broward/Documents/results/August-18-2020-Primary-Election/August-18-2020-EL30A.html)

EL52S Report (https://www.browardvotes.gov/Portals/Broward/Documents/results/August-18-2020-Primary-Election/Primary-Election-August-18,-2020-EL52A.html)

Summary Results

Change View

Vote Type View: Detailed

A dash (-) represents detailed groups (Election Day, Vote By Mail, Early Votes, Provisional) with between 1 and 29 votes in accordance with Florida Statute 98.0981(2)(a)

☆ Representative in Congress - District 20

Participating Precincts Reporting: 150 / 150

Show Graphical View

Choice	Election Day	Early Votes	Vote By Mail	Provisional	Total Votes	Percentage
Vic DeGrammont (REP)	737	371	1,748	0	2,856	49.42%

Choice	Election Day	Early Votes	Vote By Mail	Provisional	Total Votes	Percentage
David Borrero (REP)	66	37	121	0	224	39.65%
Bibiana Potestad (REP)	-	-	-	-	194	34.34%

☆ Sheriff

Participating Precincts Reporting: 577 / 577

Show Graphical View

Choice	Election Day	Early Votes	Vote By Mail	Provisional	Total Votes	Percentage
H. Wayne Clark (REP)	-	-	-	-	38,209	70.28%
Casimiro "Cazi" Navarro (REP)	-	-	-	-	16,159	29.72%

☆ State Committeeman

Participating Precincts Reporting: 577 / 577

Show Graphical View

Choice	Election Day	Early Votes	Vote By Mail	Provisional	Total Votes	Percentage
Benjamin H. Bennett II (REP)	-	-	-	-	4,140	7.87%
David Francis Booth (REP)	-	-	-	-	2,625	4.99%
Andrew Russell Brett (REP)	997	408	1,823	0	3,228	6.13%
Michael Coker (REP)	-	-	-	-	3,934	7.48%
Richard DeNapoli (REP)	11,036	4,131	18,423	0	33,590	63.83%
Robert W. Sutton (REP)	1,734	669	2,704	0	5,107	9.70%

☆ State Committeewoman

Participating Precincts Reporting: 577 / 577

Show Graphical View

Choice	Election Day	Early Votes	Vote By Mail	Provisional	Total Votes	Percentage
Celeste S. Ellich (REP)	-	-	-	-	6,736	13.18%
Daniele Marques Haddad (REP)	2,557	976	4,364	0	7,897	15.45%
Michele Merrell (REP)	-	-	-	-	26,250	51.35%
Diana L. Taub (REP)	3,184	1,325	5,726	0	10,235	20.02%

☆ Representative in Congress - District 20

AFFIDAVIT OF FILING OFFICER
Case Number: FEC 22-185

STATE OF FLORIDA
County of Broward

Joe Scott, **being duly sworn, says:**

1. This affidavit is made upon my personal knowledge.

I am of legal age and competent to testify to the matters stated herein. I am currently employed by **Broward Supervisor of Elections** as **Supervisor of Elections**.

2. Please provide copies of the listed items from the following candidate's campaign file or please indicate if the candidate did not file the document(s): **Andrew Brett**.

Did not File	ITEM
Not Filed	The Statement of Candidate form for the **2020** campaign.
Not Filed	Appointments of Treasurers and Designation of Campaign Depository form (Form DS-DE 9) for the **2020** campaign.
Not Filed	Campaign treasurer's reports, waivers, and amendments for the **2020** campaign.
N/A	Addendum requests and proof of compliance for the **2020** campaign.
N/A	Form(s) for all campaigns whereby candidate acknowledges receipt of instructions and/or campaign materials.
See attached	Any other forms filed by the candidate.
None	All checks issued by the candidate's campaign to your office (qualifying fee, maps, etc.). Please do **not** redact the bank routing and account numbers.

3. Please check each item provided to the candidate and list the date that the candidate was provided the item.

Check	ITEM	DATE
	A Compilation of The Election Laws of the State of Florida	
	Chapter 104, *Florida Statutes*	
	Chapter 106, *Florida Statutes*	
	Candidate & Campaign Treasurer Handbook. Please provide revision date of publication. _____	

	Other:[1]	

4. Relative to Chapter 106, *Florida Statutes*, and the *Candidate & Campaign Treasurer Handbook*, please indicate how these publications are provided to the candidate.

- o A candidate packet, or similar material, is given to the candidate. The candidate packet includes links to the Division of Elections' website, or our website, where these documents are available for review.
- o Publications are provided on a CD or thumb/flash drive that is given to the candidate.

Other, please explain. _____N/A_____

_____

5. Did your office[2] offer any candidate workshops, campaign skills or training seminars prior to the November 3, 2020, election? ☐ Yes or ☑ No. If yes, please list all workshops/training seminars that were attended by the candidate, along with the date of attendance. If a staff member attended for the candidate, list his/her 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 or PowerPoint presentation for the workshops/seminars.

_____

_____

6. Does your office have any record of Andrew Brett having sought elective office within your jurisdiction prior to the 2020 election? ☐ Yes or ☑ No. If yes, please list the previous office(s) he ran for, the date(s) of the election(s), and the result(s) of the election(s). If the candidate withdrew her/his candidacy for election, please indicate if the withdrawal was before or after qualifying.

_____

_____

7. Does your office have any record of Andrew Brett having been named as a chairperson or campaign treasurer of a political committee (PC or PAC) or electioneering communications

_____

[1] Any local publications relative to the Election laws that may have been provided by your office in lieu of the *Candidate & 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.

[2] If your County elections or ethics office offered candidate workshops/campaign skills or training seminars, please identify the office providing the workshops/seminars and provide copies of any notices that were sent to candidates within your jurisdiction.

organization (ECO) within your jurisdiction? ☐ Yes or ☑ No. If yes, please list the name(s) of the committees.

_____

_____

8. Did you or any member of your staff have any conversations with Andrew Brett concerning a provision of Chapter 106, Florida Statutes, relative to reporting contributions or expenditures, at any time during the 2020 campaign? ☐ Yes or ☑ No. If yes, please indicate whether the conversation was in person, in writing, or by telephone and the subject matter of the conversation. If applicable, please provide copies of records documenting the discussion.

_____

_____

_____

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

_____

Signature of Affiant

PATRICIA SANTIAGO

Print or type name of Affiant on line above.

Sworn to (or affirmed) and subscribed before me this 11 day of OCTOBER, 2022.

_____

Signature of Notary Public - State of Florida

Print, Type, or Stamp Commissioned Name of Notary Public

NOTARY PUBLIC STATE OF FLORIDA
CLAUDETTE HAMILTON
Commission # GG 303995
Commission Expires 02-20-2023
Bonded Through - Cynanotary
Florida - Notary Public

Personally Known ✓ or Produced Identification _____

Type of Identification Produced: _____

Case investigator: MBW

Aff of FO Candidate (03/20)

CANDIDATE OATH –
Committeemen and Committeewomen

Check applicable one:

- ☐ Precinct Committeeman or Committeewoman
- ☐ District Committeeman or Committeewoman
- ☒ State Committeeman or Committeewoman

2020 JUN -8 PM 1:42

BROWARD COUNTY
SUPERVISOR OF ELECTIONS

OFFICE USE ONLY

Candidate Oath

(Sections 99.021(1)(a) and (2), Florida Statutes)

I, Andrew Russell Brett

(Print name above as you wish it to appear on the ballot. If your last name consists of two or more names but has no hyphen, check box ☐. (See page 2 - Compound Last Names). No change can be made after the end of qualifying.)

am a candidate for the office of ☒ **Committeeman** ☐ **Committeewoman**

Precinct/District Number _____ *(Not applicable to State Committeemen and State Committeewomen),*

I am a qualified elector of BROWARD County, Florida; I am qualified under the Constitution and the Laws of Florida to hold the office to which I desire to be nominated or elected; and I will support the Constitution of the United States and the Constitution of the State of Florida.

Statement of Party

(Section 99.021(1)(b), Florida Statutes)

I am a member of the Republican Party; I have not been a registered member of any other political party for 365 days before the beginning of qualifying preceding the general election for which I seek to qualify; and I have paid the assessment levied against me, if any, as a candidate for said office by the executive committee of the political party, of which I am a member.

Candidate's Florida Voter Registration Number (located on your voter information card): _____

Phonetic spelling for audio ballot: Print name phonetically on the line below as you wish it to be pronounced on the audio ballot as may be used by persons with disabilities (*see* instructions on page 2 of this form): *[Not applicable to write-in candidates.]*

X _____ (954) 667-5331 ABrett5464@Comcast.net

Signature of Candidate | Telephone Number | Email Address

3930 NW 34th Terrace Lauderdale Lakes FL 33309

Address | City | State | ZIP Code

STATE OF FLORIDA

COUNTY OF BROWARD

Sworn to (or affirmed) and subscribed before me by ☑ physical or ☐ online presence this 27 day of May, 2020.

Personally Known: _____ or Produced Identification: ✓

Type of Identification Produce

_____

Signature of Notary Public

Print, Type, or Stamp Commissioned Name of Notary Public below:

NOTARY PUBLIC STATE OF FLORIDA

CLAUDETTE HAMILTON
Commission # GG 303995
Commission Expires 02-20-2023
Bonded Through - Cynanotary
Florida - Notary Public

FLORIDA ELECTIONS COMMISSION
PHONE LOG
Case No.: FEC 22-185

Respondent: Andrew Brett

Complainant: Richard DeNapoli

1. **Date and time:** 10/03/22 @ 11:19 a.m.
Name: Claudette Hamilton, Municipal Liaison Broward County SOE
Phone #: (954) 712-1961
Summary: I called the Broward County SOE to inquire about Respondent's Appointment of Treasurer. I spoke with Ms. Hamilton. She stated that the candidates for the State Executive Committee do not usually file an Appointment of Treasurer form with their office. I asked if they filed campaign reports with their office. She answered negatively. She stated that they only file an oath with them.
Entered by: MBW

2. **Date and time:** 10/03/22 @ 2:02 p.m.
Name: Claudette Hamilton
Phone #: 954-712-1961
Summary: I called Ms. Hamilton to clarify that Respondent did not file anything with their office. She did not answer.
Entered by: MBW

3. **Date and time:** 10/19/22 @ 10:19 a.m.
Name: Claudette Hamilton
Phone #: 954-712-1961
Summary: I called Ms. Hamilton to clarify that Respondent did not file anything with their office. She did not answer.
Entered by: MBW

4. **Date and time:** 10/19/22 @ 10:41 p.m.
Name: Claudette Hamilton
Phone #: 954-712-1961
Summary: Ms. Hamilton returned my call. I asked her the usual procedure for candidates running for the office of Committeeman. I asked if they usually file the DS DE 9. She stated that candidates for the office of Committeeman do not usually file a DS DE 9 because they do not usually campaign for office. She stated that the staff notify each candidate verbally when they come in to sign the oath that they need to file the appropriate paperwork if they plan on campaign or collect contributions. The candidate may obtain all the necessary documents from their website. The candidate can also go the DOE website to get the documents. Some candidates just called the SOE office and informed staff that they have decided to campaign, and staff will email the appropriate forms to the candidate. If the candidate comes into the SOE's office, SOE staff will print copies of the forms for the candidate.

Ms. Hamilton affirmed that the report for the candidate for Committeeman/woman is due four days preceding the primary. If the fourth day is on the weekend or a holiday, the report is due the next business day.
Entered by: MBW

5. **Date and time:** 10/19/22 @ 4:06 p.m.
Name: Respondent
Phone #: 954-667-5331
Summary: I called Respondent to give him an opportunity to respond to the allegations in this case. I was sent to his voice mail. I left a message.
Entered by: MBW

6. **Date and time:** 10/19/22 @ 4:08 p.m.
Name: Respondent
Phone #: 954-664-5331
Summary: I called Respondent to give him an opportunity to respond to the allegations in this case. I reached a recording that stated that "this number is not in service."
Entered by: MBW

7. **Date and time:** 10/24/22 @ 12:13 p.m.
Name: Claudette Hamilton
Phone #: 954-712-1961
Summary: I called Ms. Hamilton to clarify the exact date the Committeeman's report was due. She did not answer. I left a message.
Entered by: MBW

8. **Date and time:** 10/25/22 @ 9:07 a.m.
Name: Claudette Hamilton
Phone #: 954-712-1961
Summary: I called Ms. Hamilton to clarify the exact date the Committeeman's report was due. She did not answer. I left message.
Entered by: MBW

9. **Date and time:** 10/25/22 @ 9:30 a.m.
Name: Marlene Marin, witness
Phone #: 954-208-4073 (Number listed in complaint.)
Summary: I called Ms. Marin to ask her about the t-shirts ordered by Respondent. No one answered and there was no voicemail.
Entered by: MBW

10. **Date and time:** 10/25/22 @ 9:34 a.m.
Name: Ryan Murphy, witness
Phone #: 954-889-4088 (Number listed in complaint)
Summary: I called Mr. Murphy to ask about the payment(s) he made to Ms. Marin for the t-shirts for Respondent's campaign. A male answered the phone, I identified myself and asked for "Ryan Murphy." He responded, "you have the wrong number."
Entered by: MBW

11. **Date and time:** 10/25/22 @ 10:44 a.m.
Name: Claudette Hamilton
Phone #: 954-712-1961
Summary: I returned an earlier call from Ms. Hamilton. I asked her about exact date the 2020 report for candidates for Committeeman/woman was due. She stated that the report was due on August 14, 2020. She explained that the report is due four days before the election because a candidate can not accept any contributions five days prior to any election. I asked her about the election results for the 2020 election, she stated that she would email the link to me with the election results.

12. **Date and time:** 10/25/22 @ 1:16 p.m.
Name: Respondent
Phone #: 954-667-5331
Summary: I called Respondent to follow-up his email. He stated in an email that he would provide a response to this case by this morning, but I have not heard from him by phone or email. He did not answer. I left him a message, requesting that he contact me by 1:16 p.m. tomorrow if he plans to provide a response to the case. I also requested that he return my call because I have several questions regarding the allegations in this case. I repeated my name and phone number.
Entered by: MBW

13. **Date and time:** 10/25/22 @ 1:41 p.m.
Name: Marlene Marin, witness
Phone #: 954-208-4073
Summary: I called Ms. Marin to ask her about the t-shirts ordered by Respondent. No one answered and there was no voicemail. It sounds like a fax machine.
Entered by: MBW

14. **Date and time:** 10/26/22 @ 9:47 a.m.
Name: Respondent
Phone #: called me
Summary: Respondent called in response to my email. He stated that he was still in the hospital. He asked if he could start by making a statement. I agreed. H stated that the issues in this case have already been resolved in a lawsuit that Complainant filed against him shortly after he began posting the video. He added that Complainant sues everybody, he sued all of his opponents and the chairman of the BREC. He stated that the case number for the lawsuit is 20-011359. He stated that he feels the lawsuit resolved the issue. He stated that Judge Singer was the presiding judge. He stated that the judge reviewed the original video. She told Complainant that political candidates were "fair game when it comes to free speech." He explained that the judge took issue with the statements he made regarding Complainant's mother and Complainant not paying his child support. Respondent stated he reviewed the video to comply with the judge's order. He stated that he assumed the judge watched the entire video; therefore, he only removed the statement the judge took issue with, he thought everything was okay. He paid another $250 for the revised video. The judge dismissed the case and Complainant filed a complaint with the FEC. He stated that a man investigated the complaint and said there was nothing wrong; now Complainant sent in a second complaint. (I said the C amended the complaint.) Respondent corrected me, stating that he got a letter saying the first complaint was dismissed for lack of evidence.

I asked R if the video entitled "The truth about Richard DeNapoli" was the video that he paid for. He answered affirmatively. I asked if he recorded it. He stated he did not. He stated he paid a friend $250 to produce the video. I asked if he wrote the script. He stated that he did. He stated that his friend just read what he wrote. I asked him the name of the person who produced the video, he stated that he did not want to give me their name because he did not feel it was relevant. He stated that everything in the video was true. He insisted that he did not make anything up. I asked him if he still had the documents to support the statements in the video. He stated that he did not. I asked him about the website that he referred to in the video regarding the "prostitution" comment. He stated that the website was not longer active. I asked him who was responsible for verifying that the information in the videos was true. He stated that he was the only person responsible for verifying the statement. He stated that he had the documentation at that time but lost it in storage. I asked him was the video only posted on Facebook and YouTube. He answered affirmatively but added that he sent the videos to the Republican State Representatives and Senators. He stated that he removed all the videos when the first complaint was filed with the FEC. He stated that videos no longer exist. I asked him when he initially posted the video, he stated late July early August. He stated that he did not remember the exact date.

I asked Respondent if he used campaign contributions to pay for the video. He answered affirmatively. I asked him how much he collected in contributions. He stated he received $1100 in donations. I asked him what other expenditures were made. He stated that he paid for the t-shirts. I asked if he reimbursed "Ryan" for the $100 he paid, he stated that he did reimburse Ryan. He explained that Ms. Marin owns a t-shirt business. He stated that Ms. Marin told him that she would make the t-shirts for him for $50. He stated that he thought she was saying that she would donate give him the t-shirts as an in-kind contribution. He stated that when she delivered the t-shirts, she said the cost for the t-shirts was $200, he added he pay for some signs and to attend a couple Republican functions. I asked him to explain why he did not file a report disclosing the financial activity. He stated that he was told that he did not have to file a report if his contributions did not exceed $5,000. I asked him who told him that. He stated that he did not recall. I asked did he verify that advise by checking with any resource or calling the SOE. He stated that he did not do anything to verify it. I asked him if he opened a campaign account. He stated that he did not open a campaign account, he just used his personal account. He asked if he needed to file the report when he got out of the hospital. I told him to check with the SOE. I asked if he could email me an itemized list of his contributions, expenditures, and in-kind contributions. He agreed. I asked if he received any in-kind contributions, he stated that the in-kind contribution totaled $600.
Entered by: MBW

15. **Date and time:**
Name:
Phone #:
Summary:
Entered by:

16. **Date and time:**
Name:

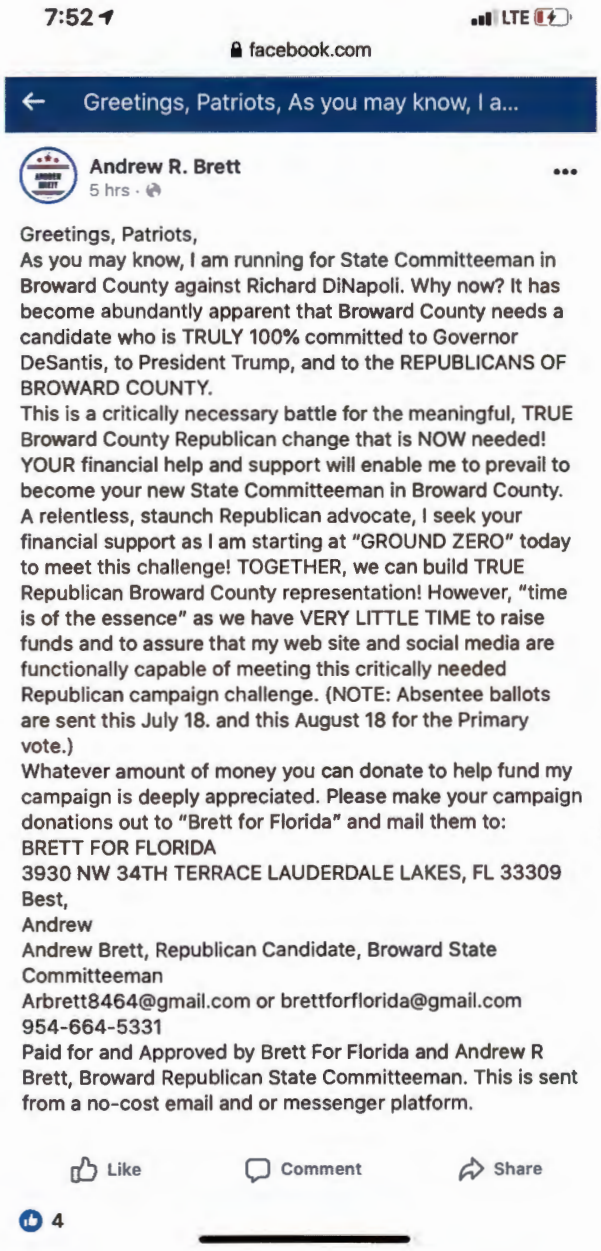

7:52
LTE
facebook.com
Greetings, Patriots, As you may know, I a...
Andrew R. Brett
5 hrs ·
Greetings, Patriots,
As you may know, I am running for State Committeeman in Broward County against Richard DiNapoli. Why now? It has become abundantly apparent that Broward County needs a candidate who is TRULY 100% committed to Governor DeSantis, to President Trump, and to the REPUBLICANS OF BROWARD COUNTY.
This is a critically necessary battle for the meaningful, TRUE Broward County Republican change that is NOW needed! YOUR financial help and support will enable me to prevail to become your new State Committeeman in Broward County. A relentless, staunch Republican advocate, I seek your financial support as I am starting at "GROUND ZERO" today to meet this challenge! TOGETHER, we can build TRUE Republican Broward County representation! However, "time is of the essence" as we have VERY LITTLE TIME to raise funds and to assure that my web site and social media are functionally capable of meeting this critically needed Republican campaign challenge. (NOTE: Absentee ballots are sent this July 18. and this August 18 for the Primary vote.)
Whatever amount of money you can donate to help fund my campaign is deeply appreciated. Please make your campaign donations out to "Brett for Florida" and mail them to:
BRETT FOR FLORIDA
3930 NW 34TH TERRACE LAUDERDALE LAKES, FL 33309
Best,
Andrew
Andrew Brett, Republican Candidate, Broward State Committeeman
Arbrett8464@gmail.com or brettforflorida@gmail.com
954-664-5331
Paid for and Approved by Brett For Florida and Andrew R Brett, Broward Republican State Committeeman. This is sent from a no-cost email and or messenger platform.
Like
Comment
Share
4

EXHIBIT 1


9:34
Andrew R. Brett
Robert W. Sutton and 36 others
37
5
3
Andrew R. Brett
Jun 11, 2020 ·
THANK YOU FOR THE HUGE DONATION!! YOU KNOW WHO YOU ARE XOXO😍
#WINNING
13
13
5
Andrew R. Brett
Jun 11, 2020 ·
facebook.com

EXHIBIT 6 1

EXHIBIT 2B

12:31
AA
facebook.com
THANK YOU FOR THE HUGE DONATION!! YOU KNOW WHO YOU ARE XOXO
#WINNING
Like
Comment
Share
13
Scott Newmark
just tell us. Why make us wait for the public finance reports.
2
3 wks Like Reply More
Andrew R. Brett replied · 1 reply
Richard Bryant
Your welcome but I didn't think I would call $20 huge
3 wks Like Reply More
Andrew R. Brett
Thank you Richard I just got your donation today xoxoxoxoxo
1
3 wks Like Reply More

EXHIBIT 3

9:26
LTE
AA
facebook.com
Y'all need to be talking about Act Blue the way y'all talk about the 2nd collection plate and the love offering for the visiting pastors in church... But no, you will continue to let the people come in your pulpits to offer false hope and lies before the congregation every four years.
If you donate to BLM and think that your coin is truly helping a... More
Like
Comment
Share
Andrew R. Brett
15 mins
THANK YOU TO THOSE WHO ARE SENDING IN DONATIONS FOR MY CAMPAIGN....
EVERY DOLLAR HELPS... PLEASE IF YOU CAN $5 $10 $100
MAKE CHECKS PAYABLE TO:
BRETT FOR FLORIDA
3930 NW 34TH TERRACE
LAUDERDALE LAKES, FL.... More
ANDREW
BRETT
FOR STATE
COMMITTEEMAN
2
1 Share
Like
Comment
Share

Marlene Marin

2h ·

Do not vote for Andrew Brett as a committeeman. He is a lyer a thief and will use you for what he can get. He ordered shirts from me for his campaign. . I delieved them to his house on a Tuesday. He told me ill zelle you the money by Saturday. I waited all day . figured i would trust him since he was a friend. I asked him Saturday and never saying anything. he never paid me. and then when I asked him again he blocked me. Then I called his partner ryan who paid me 100 dollars out of his own money so now he still owes me 100. . ANDREW BRETT IS A SCAMMER AND A LYER DONT TRUST HIM FOR COMMITTEEMAN

10 8 Comments 2 Shares

Like Comment Send

Janet Klomburg
You gotta be kidding me!

Marlene Marin
Janet I wish i was. when i told him when will i expect the money he bloc... See More

EXHIBIT 4

8:13

facebook.com

Andrew R. Brett
1 hr ·

It's appalling and extremely disingenuous that a fellow Republican and Ambassador For Americans For Trump can be so callous and mean spirited to me. Those who KNOW ME can and will attest that I AM NOT those as she claims and described!! FACT
I was advised that the 24 t-shirts were an in kind contribution and wasn't made aware till 10 minutes till she arrived at my home it was $200. If I knew at the onset-- I sure would NOT have moved forward whatsoever! FACT!!
Due to her antics and blasphemy, I have requsted to President of Americans For Trump Scott Newmark that she and her husband be banned today from the organization and both be stripped from their Ambassador status.
She also contacted me to write a FALSE review of her daughter's pet sitting business which I know nothing about nor her daughter norr how she treats animal's! Again, I DON'T lie and did not write the review.

Now moving forward 😁

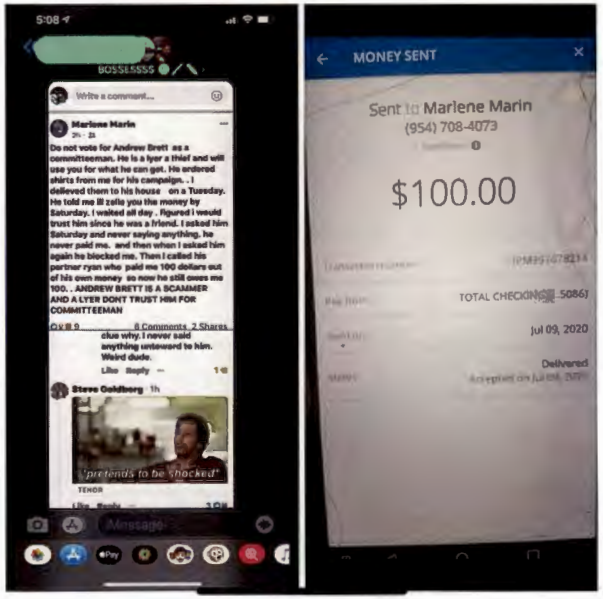


Exhibit 8

9:29

← Andrew R. Brett

Andrew R. Brett
Aug 9, 2020 ·

I WANT TO THANK ALL OF YOU FOR YOUR BIRTHDAY WISHES AND CONCERN FOR MY MOTHER!!

IF ALL WHO LIKED OR COMMENTED WOULD TAKE A MOMENT AND DONATE $5.00 OR MORE TO MY CAMPAIGN FOR A FINAL MEDIA PUSH THIS COMING WEEKEND !

https://www.brettforflorida.com/donate.html

11

facebook.com

EXHIBIT "a"

EXHIBIT "C"

Andrew R. Brett
August 3, 2020 ·

Stay tuned for upcoming documentary..
"DeNapoli - Lying, Denying and Falsifying!!"
By Andrew R.Brett you next elected State Committeeman!

9 1 Comment 5 Shares

Like Comment Share

Andrew R. Brett
Scott Newmark Darlene Swaffar Jill Cueni-Cohen **Robert W. Sutton Celeste Shank Ellich Mary Sturm Janet Klomburg** Chris Nelson **Diana Lynn Taub Lida Pols Diane Kushner** Peter Feaman **Ken Baker**

Like **Reply** 2y

Write a comment...

DeNapoli- A Documentary of Lying- Denying - and - Falsifying

rdenapoli@yahoo.../Inbox

Andrew Brett <arbrett8464@gmail.com>
To: **Mary Sturm** <marysturm22@gmail.com>
Bcc: **rdenapoli@yahoo.com**

Aug 4, 2020 at 3:13 PM

Worth 10 Minutes of your time!!

2 Files 9.1MB

Brett Audio Project (1).mp3
9MB

Capture (1) (3).PNG
22kB

EXHIBIT 6

Re: DeNapoli- A Documentary of Lying - Denying - and - Falsifying by Andrew R Brett rdenapoli@yahoo.../Sent

Richard DeNapoli <rdenapoli@yahoo.com> Aug 5, 2020 at 2:08 PM
To: **John Hume** <johnhume@comcast.net>

Thank you for sending it. A defamation case has been filed.

—Richard DeNapoli
*This email is intended only for the use of the party to which it is addressed and may contain information that is privileged, confidential, or protected by law. If you are not the intended recipient, or the employee or agent responsible for delivering this document to the intended recipient, you are hereby notified that any dissemination, copying or distribution of this email or its contents is strictly prohibited. If you have received this message in error, please notify me immediately by telephone or by replying to the message and deleting it from your computer. Thank you *

On Aug 5, 2020, at 1:52 PM, John Hume <johnhume@comcast.net> wrote:

FYI
john

From: Andrew Brett [mailto:arbrett8464@gmail.com]
Sent: Wednesday, August 05, 2020 1:27 PM
To: johnhume@comcast.net
Subject: Re: DeNapoli- A Documentary of Lying - Denying - and - Falsifying by Andrew R Brett

video version
https://www.youtube.com/watch?v=eQF6iLR-RK0&feature=youtu.be&fbclid=IwAR2HcC5qSjuZrO9RPcVRAmYws_ZTF9BggrvU5jlVSvEpMSrYtqGs3tlwwho

On Tue, Aug 4, 2020 at 4:29 PM Andrew Brett <arbrett8464@gmail.com> wrote:
WITH THE 10 MINUTES... PLEASE SHARE

Virus-free. www.avast.com

EXHIBIT 7

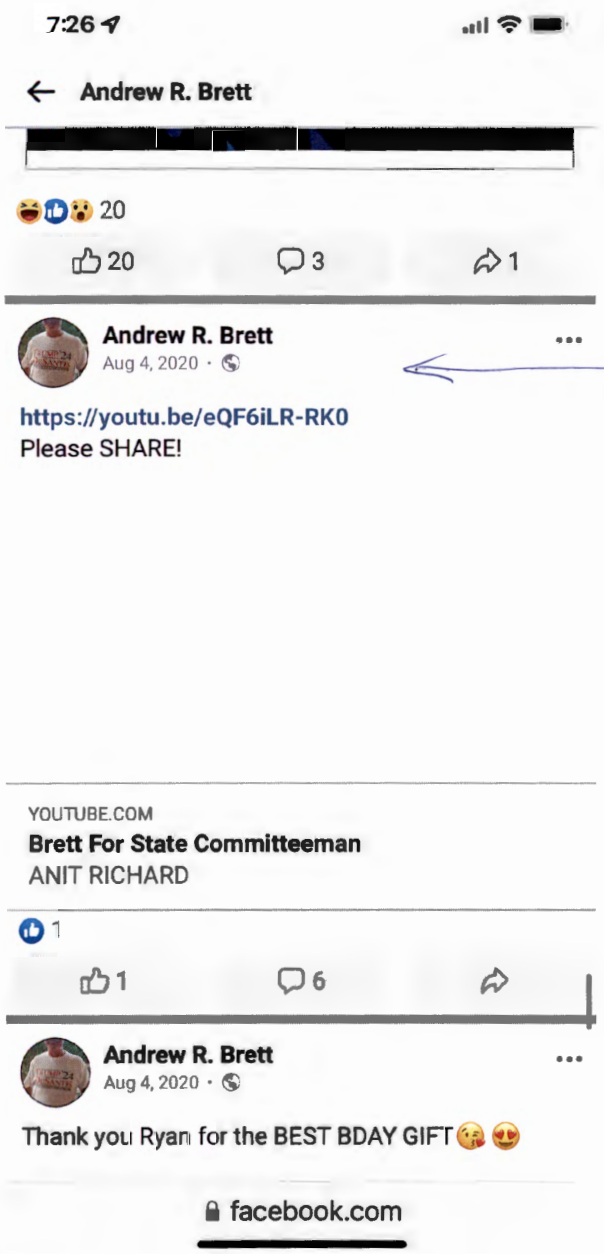


EXHIBIT "A"
showing RKO video link


Andrew R. Brett was live.
August 5, 2020 ·
14
19 Comments 312
Like
Comment
Sh
Comments
Most relevai
Andrew R. Brett
https://youtu.be/eQF6iLR-RK0
YOUTUBE.COM
Brett For State Committeeman
Like Reply 2y
Wednesday, August 5, 2020 at 5:56 PM
Hi Mayor Patty Gilliland
Like Reply 2y
Andrew R. Brett
Annie Marie Delgado Randy Ross

EXHIBIT "B"

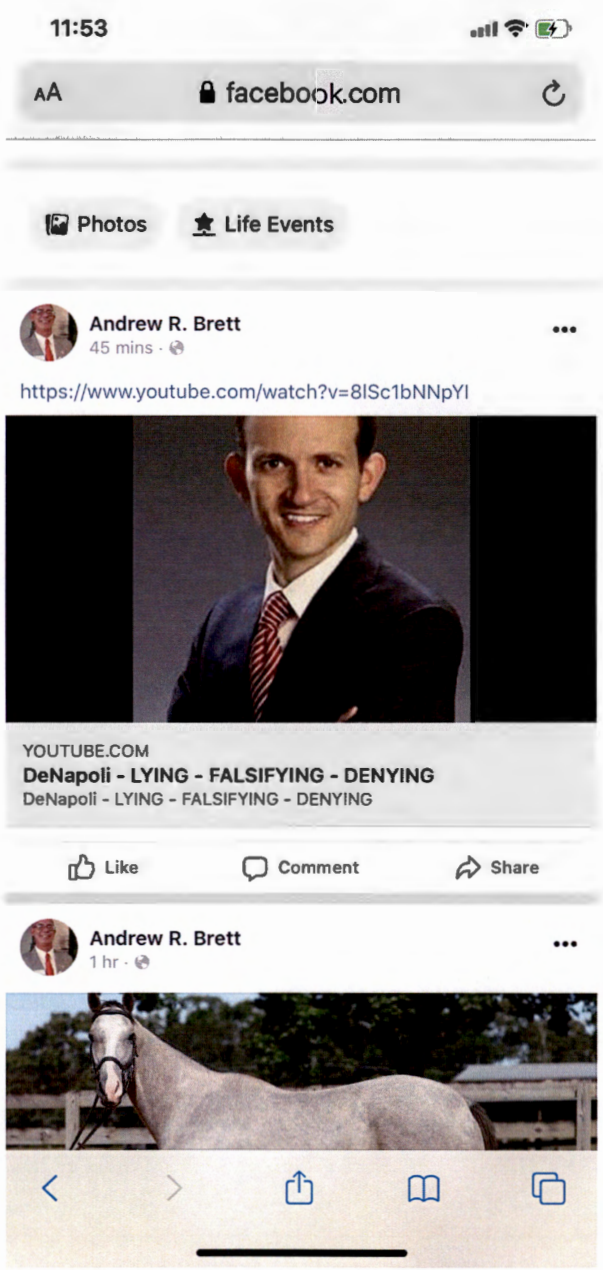

11:53
AA
facebook.com
Photos
Life Events
Andrew R. Brett
45 mins ·
https://www.youtube.com/watch?v=8lSc1bNNpYI
YOUTUBE.COM
DeNapoli - LYING - FALSIFYING - DENYING
DeNapoli - LYING - FALSIFYING - DENYING
Like
Comment
Share
Andrew R. Brett
1 hr ·

EXHIBIT "D"

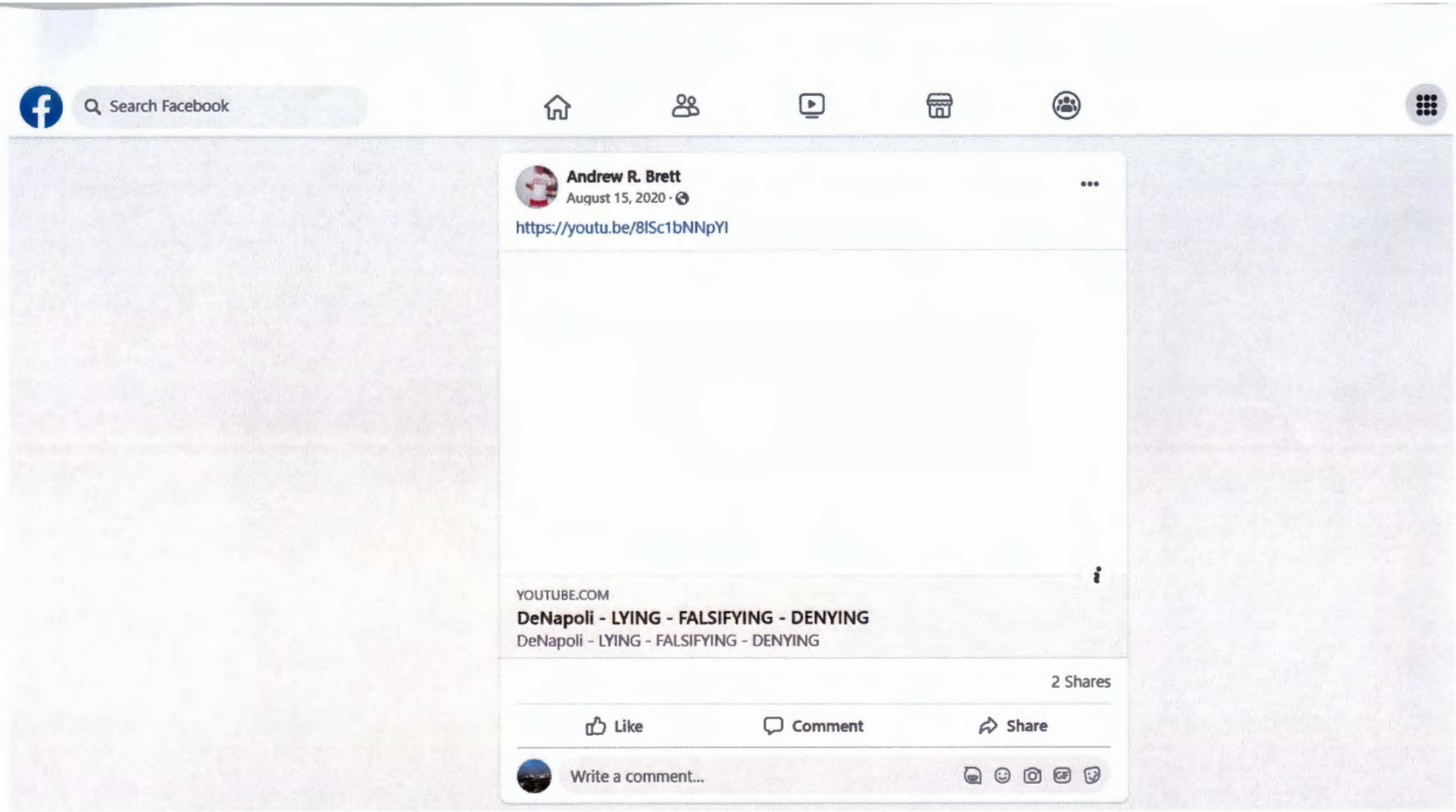

Search Facebook
Andrew R. Brett
August 15, 2020 ·
https://youtu.be/8lSc1bNNpYI
YOUTUBE.COM
DeNapoli - LYING - FALSIFYING - DENYING
DeNapoli - LYING - FALSIFYING - DENYING
2 Shares
Like
Comment
Share
Write a comment...

EXHIBIT "H"

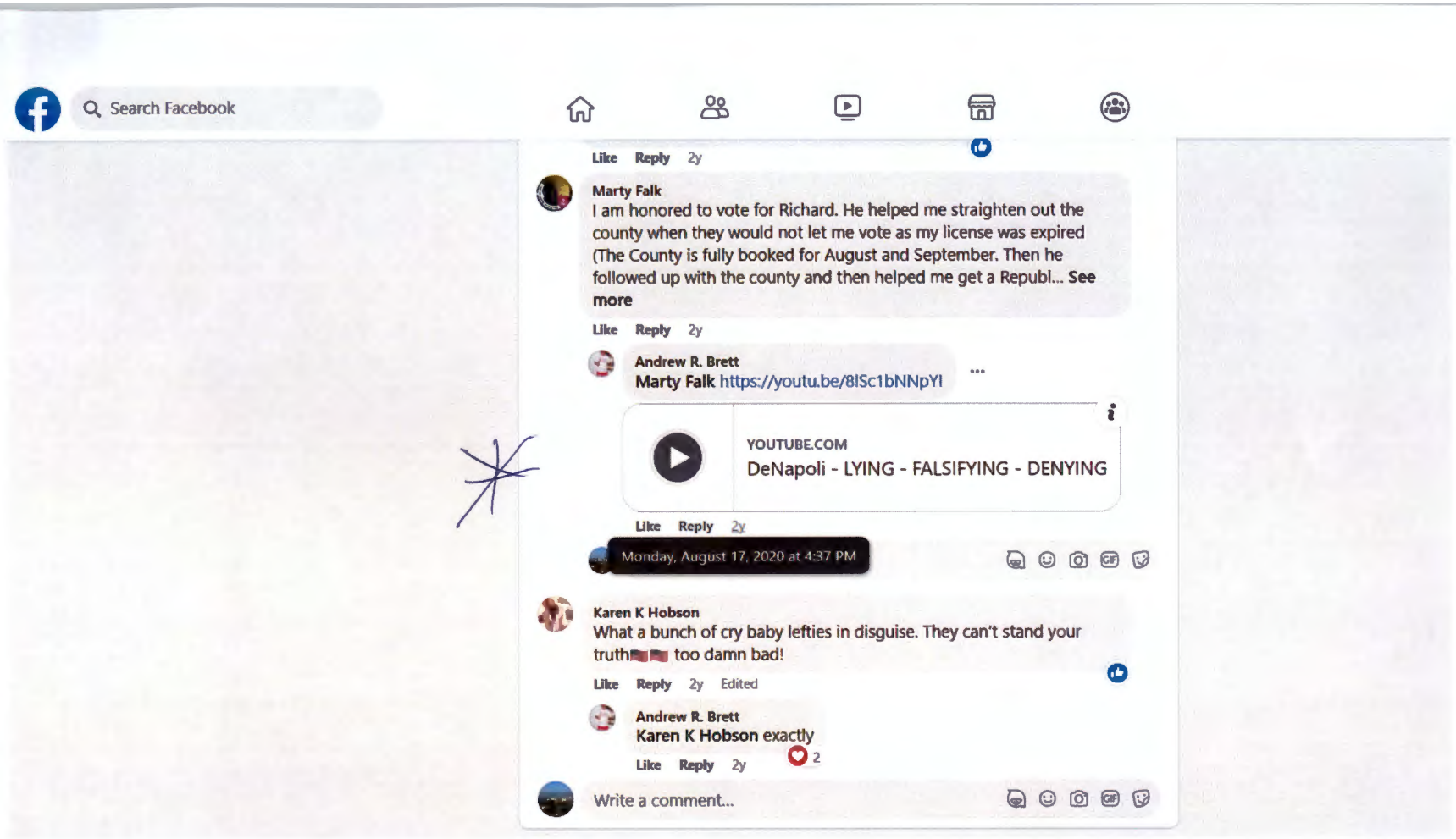


EXHIBIT "I 2" showing date August 17, 2020

From: Andrew Brett
To: Margie Wade
Subject: Andrew Brett donor list
Date: Wednesday, October 26, 2022 11:16:56 AM

Hi Ms. Wade,
Below is the list of donations I received for my Broward County Republican State Committeeman Campaign..

Dr. George Brett $150
Richard Bryant $20
Terry Trigor $75
Dr.Kathleen Bosco $600 yard signs
George H Morris $500
Magfret Evans $700
Kenn Starr $50
Margy Lynn $50
Kathy Hobsetter $600 in kind campaign web site
Women for Trump Broward $100

FLORIDA ELECTIONS COMMISSION
PHONE LOG
Case No.: FEC 22-185

Respondent: Andrew Brett

Complainant: Richard DeNapoli

1. **Date and time:** 10/03/22 @ 11:19 a.m.
Name: Claudette Hamilton, Municipal Liaison Broward County SOE
Phone #: (954) 712-1961
Summary: I called the Broward County SOE to inquire about Respondent's Appointment of Treasurer. I spoke with Ms. Hamilton. She stated that the candidates for the State Executive Committee do not usually file an Appointment of Treasurer form with their office. I asked if they filed campaign reports with their office. She answered negatively. She stated that they only file an oath with them.
Entered by: MBW

2. **Date and time:** 10/03/22 @ 2:02 p.m.
Name: Claudette Hamilton
Phone #: 954-712-1961
Summary: I called Ms. Hamilton to clarify that Respondent did not file anything with their office. She did not answer.
Entered by: MBW

3. **Date and time:** 10/19/22 @ 10:19 a.m.
Name: Claudette Hamilton
Phone #: 954-712-1961
Summary: I called Ms. Hamilton to clarify that Respondent did not file anything with their office. She did not answer.
Entered by: MBW

4. **Date and time:** 10/19/22 @ 10:41 p.m.
Name: Claudette Hamilton
Phone #: 954-712-1961
Summary: Ms. Hamilton returned my call. I asked her the usual procedure for candidates running for the office of Committeeman. I asked if they usually file the DS DE 9. She stated that candidates for the office of Committeeman do not usually file a DS DE 9 because they do not usually campaign for office. She stated that the staff notify each candidate verbally when they come in to sign the oath that they need to file the appropriate paperwork if they plan on campaign or collect contributions. The candidate may obtain all the necessary documents from their website. The candidate can also go the DOE website to get the documents. Some candidates just called the SOE office and informed staff that they have decided to campaign, and staff will email the appropriate forms to the candidate. If the candidate comes into the SOE's office, SOE staff will print copies of the forms for the candidate.

Ms. Hamilton affirmed that the report for the candidate for Committeeman/woman is due four days preceding the primary. If the fourth day is on the weekend or a holiday, the report is due the next business day.
Entered by: MBW

5. **Date and time:** 10/19/22 @ 4:06 p.m.
Name: Respondent
Phone #: 954-667-5331
Summary: I called Respondent to give him an opportunity to respond to the allegations in this case. I was sent to his voice mail. I left a message.
Entered by: MBW

6. **Date and time:** 10/19/22 @ 4:08 p.m.
Name: Respondent
Phone #: 954-664-5331
Summary: I called Respondent to give him an opportunity to respond to the allegations in this case. I reached a recording that stated that "this number is not in service."
Entered by: MBW

7. **Date and time:** 10/24/22 @ 12:13 p.m.
Name: Claudette Hamilton
Phone #: 954-712-1961
Summary: I called Ms. Hamilton to clarify the exact date the Committeeman's report was due. She did not answer. I left a message.
Entered by: MBW

8. **Date and time:** 10/25/22 @ 9:07 a.m.
Name: Claudette Hamilton
Phone #: 954-712-1961
Summary: I called Ms. Hamilton to clarify the exact date the Committeeman's report was due. She did not answer. I left message.
Entered by: MBW

9. **Date and time:** 10/25/22 @ 9:30 a.m.
Name: Marlene Marin, witness
Phone #: 954-208-4073 (Number listed in complaint.)
Summary: I called Ms. Marin to ask her about the t-shirts ordered by Respondent. No one answered and there was no voicemail.
Entered by: MBW

10. **Date and time:** 10/25/22 @ 9:34 a.m.
Name: Ryan Murphy, witness
Phone #: 954-889-4088 (Number listed in complaint)
Summary: I called Mr. Murphy to ask about the payment(s) he made to Ms. Marin for the t-shirts for Respondent's campaign. A male answered the phone, I identified myself and asked for "Ryan Murphy." He responded, "you have the wrong number."
Entered by: MBW

11. **Date and time:** 10/25/22 @ 10:44 a.m.
Name: Claudette Hamilton
Phone #: 954-712-1961
Summary: I returned an earlier call from Ms. Hamilton. I asked her about exact date the 2020 report for candidates for Committeeman/woman was due. She stated that the report was due on August 14, 2020. She explained that the report is due four days before the election because a candidate can not accept any contributions five days prior to any election. I asked her about the election results for the 2020 election, she stated that she would email the link to me with the election results.

12. **Date and time:** 10/25/22 @ 1:16 p.m.
Name: Respondent
Phone #: 954-667-5331
Summary: I called Respondent to follow-up his email. He stated in an email that he would provide a response to this case by this morning, but I have not heard from him by phone or email. He did not answer. I left him a message, requesting that he contact me by 1:16 p.m. tomorrow if he plans to provide a response to the case. I also requested that he return my call because I have several questions regarding the allegations in this case. I repeated my name and phone number.
Entered by: MBW

13. **Date and time:** 10/25/22 @ 1:41 p.m.
Name: Marlene Marin, witness
Phone #: 954-208-4073
Summary: I called Ms. Marin to ask her about the t-shirts ordered by Respondent. No one answered and there was no voicemail. It sounds like a fax machine.
Entered by: MBW

14. **Date and time:** 10/26/22 @ 9:47 a.m.
Name: Respondent
Phone #: called me
Summary: Respondent called in response to my email. He stated that he was still in the hospital. He asked if he could start by making a statement. I agreed. H stated that the issues in this case have already been resolved in a lawsuit that Complainant filed against him shortly after he began posting the video. He added that Complainant sues everybody, he sued all of his opponents and the chairman of the BREC. He stated that the case number for the lawsuit is 20-011359. He stated that he feels the lawsuit resolved the issue. He stated that Judge Singer was the presiding judge. He stated that the judge reviewed the original video. She told Complainant that political candidates were "fair game when it comes to free speech." He explained that the judge took issue with the statements he made regarding Complainant's mother and Complainant not paying his child support. Respondent stated he reviewed the video to comply with the judge's order. He stated that he assumed the judge watched the entire video; therefore, he only removed the statement the judge took issue with, he thought everything was okay. He paid another $250 for the revised video. The judge dismissed the case and Complainant filed a complaint with the FEC. He stated that a man investigated the complaint and said there was nothing wrong; now Complainant sent in a second complaint. (I said the C amended the complaint.) Respondent corrected me, stating that he got a letter saying the first complaint was dismissed for lack of evidence.

I asked R if the video entitled "The truth about Richard DeNapoli" was the video that he paid for. He answered affirmatively. I asked if he recorded it. He stated he did not. He stated he paid a friend $250 to produce the video. I asked if he wrote the script. He stated that he did. He stated that his friend just read what he wrote. I asked him the name of the person who produced the video, he stated that he did not want to give me their name because he did not feel it was relevant. He stated that everything in the video was true. He insisted that he did not make anything up. I asked him if he still had the documents to support the statements in the video. He stated that he did not. I asked him about the website that he referred to in the video regarding the "prostitution" comment. He stated that the website was not longer active. I asked him who was responsible for verifying that the information in the videos was true. He stated that he was the only person responsible for verifying the statement. He stated that he had the documentation at that time but lost it in storage. I asked him was the video only posted on Facebook and YouTube. He answered affirmatively but added that he sent the videos to the Republican State Representatives and Senators. He stated that he removed all the videos when the first complaint was filed with the FEC. He stated that videos no longer exist. I asked him when he initially posted the video, he stated late July early August. He stated that he did not remember the exact date.

I asked Respondent if he used campaign contributions to pay for the video. He answered affirmatively. I asked him how much he collected in contributions. He stated he received $1100 in donations. I asked him what other expenditures were made. He stated that he paid for the t-shirts. I asked if he reimbursed "Ryan" for the $100 he paid, he stated that he did reimburse Ryan. He explained that Ms. Marin owns a t-shirt business. He stated that Ms. Marin told him that she would make the t-shirts for him for $50. He stated that he thought she was saying that she would donate give him the t-shirts as an in-kind contribution. He stated that when she delivered the t-shirts, she said the cost for the t-shirts was $200, he added he pay for some signs and to attend a couple Republican functions. I asked him to explain why he did not file a report disclosing the financial activity. He stated that he was told that he did not have to file a report if his contributions did not exceed $5,000. I asked him who told him that. He stated that he did not recall. I asked did he verify that advise by checking with any resource or calling the SOE. He stated that he did not do anything to verify it. I asked him if he opened a campaign account. He stated that he did not open a campaign account, he just used his personal account. He asked if he needed to file the report when he got out of the hospital. I told him to check with the SOE. I asked if he could email me an itemized list of his contributions, expenditures, and in-kind contributions. He agreed. I asked if he received any in-kind contributions, he stated that the in-kind contribution totaled $600.
Entered by: MBW

15. **Date and time:**
Name:
Phone #:
Summary:
Entered by:

16. **Date and time:**
Name:

Phone #:
Summary:
Entered by:

17. **Date and time:**
Name:
Phone #:
Summary:
Entered by:

From: Andrew Brett
To: Margie Wade
Subject: Andrew Brett donor list
Date: Wednesday, October 26, 2022 11:16:56 AM

Hi Ms. Wade,
Below is the list of donations I received for my Broward County Republican State Committeeman Campaign..

Dr. George Brett $150
Richard Bryant $20
Terry Trigor $75
Dr.Kathleen Bosco $600 yard signs
George H Morris $500
Magfret Evans $700
Kenn Starr $50
Margy Lynn $50
Kathy Hobsetter $600 in kind campaign web site
Women for Trump Broward $100

From: Margie Wade
To: Andrew Brett
Subject: RE: Andrew Brett
Date: Monday, October 24, 2022 11:57:00 AM

Thanks for letting me know.

Best regards,

Margie B. Wade
Investigation Specialist
Florida Elections Commission
107 W. Gaines St., Suite 224
Tallahassee, FL 32399
Phone: 850-922-4539
Email: Margie.Wade@myfloridalegal.com

From: Andrew Brett <arbrett8464@gmail.com>
Sent: Monday, October 24, 2022 11:44 AM
To: Margie Wade <Margie.Wade@myfloridalegal.com>
Subject: Andrew Brett

Hi Ms.Wade
I'm in the hospital and hope to respond by the end of the tomorrow morning at the latest.

Best,
Andrew R. Brett

Florida Elections Commission

107 West Gaines Street, Suite 224 Tallahassee, Florida 32399-6596
Telephone: (850) 922-4539 · Facsimile: (850) 921-0783
FEC@myfloridalegal.com · www.fec.state.fl.us

September 14, 2022

Andrew Brett
4071 N. Dixie Hwy; Apt 26
Oakland Park, FL 33334

RE: Case No.: FEC 22-185; Respondent: Andrew Brett

Dear Mr. Brett:

On August 4, 2022, 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 106.0702(1), Florida Statutes:** Respondent, a 2020 candidate for Republican State Committeeman, failed to file a report due on the 4th day immediately preceding the primary election of all contributions received and all expenditures made.
>
> **Section 106.19(1)(b), Florida Statutes:** Respondent, a 2020 candidate for Republican State Committeeman, may have failed to report one or more contributions required to be reported by Chapter 106, Florida Statutes, in a report due on the 4th day immediately preceding the primary election, as alleged in the complaint.
>
> **Section 106.19(1)(c), Florida Statutes:** Respondent, a 2020 candidate for Republican State Committeeman, may have falsely reported or deliberately failed to include information in a report due on the 4th day immediately preceding the primary election of all contributions received and all expenditures made, as required by Chapter 106, Florida Statutes, as alleged in the complaint.

When we conclude the investigation, a copy of the Report of Investigation (ROI) will be mailed to you at the above address. Based on the results of the investigation, a staff attorney will prepare and present a written Staff Recommendation (SR) to the Commission as to whether there is probable cause to charge you, the Respondent, with violating Chapters 104 or 106, Florida Statutes. You will have an opportunity to respond to both the ROI and the SR. The Commission will then hold one or more hearings to determine whether the alleged violations occurred and, if

so, the amount of the fine to be imposed upon you. Notice will be mailed to you and the Complainant at least 14 days before any hearing at which your case is to be considered.

Pursuant to Section 106.25(4)(i)3., Florida Statutes, the Commission may enter into a consent agreement with a Respondent to settle a complaint prior to a finding of probable cause. If you are interested in entering negotiations directed towards reaching a consent agreement to resolve this matter, please contact the Commission and request to speak with the attorney assigned to this case.

Please note that all documents related to this matter will be mailed to the above address unless you notify us of a new address.

Pursuant to Section 106.25, Florida Statutes, complaints, investigations, investigative reports, and other documents relating to an alleged violation of Chapters 104 or 106, Florida Statutes, are confidential until the Commission finds probable cause or no probable cause, unless the Respondent files a written waiver of confidentiality with the Commission. The confidentiality provision does not apply to the Complainant or the Respondent.

Should 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.

For additional information, please refer to the "Frequently Asked Questions" section of the Commission's website.

If you have additional questions, please contact **Chuck Mellow**, the investigator assigned to this case, by phone at (850) 922-4539 or by email at Charles.Mellow@myfloridalegal.com.

Sincerely,

Tim Vaccaro
Executive Director

TV/jd

FLORIDA ELECTIONS COMMISSION
107 West Gaines Street, Suite 224, Tallahassee, FL 32399-1050

REC'D: FL ELECTIONS COM
4 AUG '22 PM3:51

COMPLAINT

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 it is brought.

1. PERSON BRINGING COMPLAINT:

Name: Richard DeNapoli Work Phone: (786) 497-1216

Address: c/o Coral Gables Trust, 401 E. Las Olas Blvd., #1510 Home Phone: (954) 488-1890

City: Fort Lauderdale County: Broward State: FL Zip Code: 33301

2. PERSON AGAINST WHOM COMPLAINT IS BROUGHT:

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

Name of individual or entity: Andrew Brett

Address: 4071 N Dixie Hwy Apt 26 Phone: (954) 667-5331

City: Oakland Park County: Broward State: FL Zip Code: 33334

If individual is a candidate, list the office or position sought: Broward Republican State Committeeman

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

Are you alleging a violation of Section 104.271(2), F.S.? (check one) ☑ Yes ☐ No

Are you alleging a violation of Section 104.2715, F.S.? (check one) ☐ Yes ☑ No

3. ALLEGED VIOLATION(S):

Please attach a **concise** narrative statement in which you list the provisions of the Florida Election Code that you believe the person named above may have violated. The Commission has jurisdiction only to investigate provisions of Chapter 104 and Chapter 106, Florida Statutes. Please include the following items as part of your attached statement:

- The facts and actions that you believe support the violations you allege;
- The names/telephone numbers of persons whom you believe may be witnesses to the facts;
- A copy or picture of any political advertisement(s) you mention in your statement;
- A copy of each document you mention in your statement;
- An explanation of why you believe information you reference from websites is relevant; and
- Any other evidence supporting your allegations.

SEE REVERSE SIDE OF DOCUMENT FOR ADDITIONAL INFORMATION

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.

RECD: FL ELECTIONS COM
4 AUG 22 PM 3:51

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

Sworn to and subscribed before me this 2nd day of August, 20 22

Signature of Officer Authorized to Administer Oaths or Notary Public

MICHELLE VITERI
Notary Public - State of Florida
Commission # GG 217763
My Comm. Expires Sep 11, 2022
Bonded through National Notary Assn.

Michelle Viteri

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

Personally Known ✓ Or Produced Identification_____

Type of Identification Produced_____

5. IMPROPERLY COMPLETED COMPLAINT FORMS MAY BE RETURNED:

- You **MUST submit this** completed complaint **form** in order to file a complaint.
- You **MUST** complete **ALL FOUR** of the above sections of this form. **DO NOT** leave any blanks.
- You **MUST** submit the **ORIGINAL** complaint form. Copied/faxed/emailed forms are returned.
- Each complaint can only be filed against **ONE PERSON** or **ENTITY.** If you wish to file against multiple parties, you **MUST** submit a complaint form **for each party** you wish to file against.
- **DO NOT** submit multiple complaint forms with one set of attachments applying to multiple complaints. You **MUST** attach **copies** of attachments **to each complaint** to which they apply.
- **MAKE SURE** the alleged violation(s) of **Chapters 104 or 106** occurred within the last **2 years**.
- **MAKE SURE** your complaint is **sworn** and there is **no defect** to the **notarization** in Section 4.

FLORIDA ELECTIONS COMMISSION COMPLAINT

AGAINST ANDREW BRETT

This is a complaint by Richard DeNapoli (hereinafter "me", "I", or "DENAPOLI"), elected Broward Republican State Committeeman, against Andrew Brett (hereinafter "BRETT"), candidate for Broward Republican State Committeeman in the election that took place on August 18, 2020. While I understand that the statute of limitations is two years, I have included some information here as reference that is from slightly prior to the two-year period. However, the substance of the following alleged violations of Chapter 104 and Chapter 106 are all still within the two-year period and I believe there exists probable cause for each of these, that they were willful violations, and ask that the Commission refer my complaint as appropriate to the Broward State Attorney. This complaint contains three allegations which would all be violations of Florida Statutes.

Allegation #1:

BRETT's failure to file a report of all contributions he received and all expenditures made during his State Committeeman campaign, which report was required under Florida Statute 106.0702 and due on the 4th day immediately preceding the primary election, or August 14, 2020. The statute of limitations for failure to file this report would thus end on August 14, 2022.

This report was required to be filed by "an individual seeking a publicly elected position on a political party executive committee who receive a contribution or makes an expenditure…" Brett was seeking such a position, did claim to have received contributions via social media, and failed to file the report with the Broward Supervisor of Elections.

Pursuant to Section (7)(a) of 106.0702, "A reporting individual who fails to file a report on the designated due date is subject to a fine, and such fine shall be paid only from personal funds of the reporting individual. The fine shall be $50 per day for the first 3 days late and, thereafter, $500 per day for each late day, not to exceed 25 percent of the total receipts or expenditures, whichever is greater. The fine shall be assessed by the supervisor, and the moneys collected shall be deposited into the general revenue fund of the political subdivision."

BRETT first claimed on June 11, 2020 via Facebook and email the following: "Whatever amount of money you can donate to help fund my campaign is deeply appreciated. Please make your campaign donations out to "Brett for Florida" and mail them to BRETT FOR FLORIDA 3930 NW 34th Terrace, Lauderdale Lakes, FL 33309…Paid for an Approved by Brett for Florida and Andrew R. Brett, Broward Republican State Committeeman. This is sent from a no-cost email and or messenger platform." Brett omitted the "for" in Andrew Brett for State Committeeman. (See Exhibit 1.)

BRETT also on June 11th wrote on Facebook "THANK YOU FOR THE HUGE DONATION!! YOU KNOW WHO YOU ARE XOXO #WINNING" (See Exhibit 2 and 2B.)

In the comment there is a post by Richard Bryant saying "You welcome but I didn't think I would call $20 huge" to which BRETT wrote back "Thank you Richard I just got your donation today xoxoxoxoxo" (See Exhibit 2B.)

BRETT then claimed on June 16th via Facebook: "Thank you to those who are sending in donations for my campaign....every dollar helps...please if you can $5 $10 $1000 Make Checks payable to BRETT FOR FLORIDA 3930 NW 34th Terrace, Lauderdale Lakes, FL..." (See Exhibit 3)

Later Marlene Marin on Facebook wrote: "Don't vote for Andrew Brett as a committeeman...He is a lyer and thief ... he ordered shirts from me for his campaign. I delivered them to his house on a Tuesday. He told me ill zelle you the money by Saturday...he never paid me. and then when I asked him again he blocked me. Then I called his partner ryan who paid me 100 dollars out of his own money so now he still owes me 100. ANDREW BRETT IS A SCAMMER AND A LYER DONT TRUST HIM FOR COMMITTEEMAN." BRETT wrote that "I was advised that the 24 t-shirts were an in kind contribution and wasn't made aware till 10 minutes till she arrived at my home it was $200...." (See Exhibits 4, 4B, Marin post and Facebook response post by BRETT).

Despite the above evidence that he did receive and/or expend funds for his campaign, BRETT did not file a campaign finance report on August 14, 2020, as required. **BRETT's failure to file the report would also be a violation of F.S. 106.19(1)(b), regarding knowing and willful failure to report a contribution by a candidate.**

Names/telephone numbers of persons whom I believe may be witnesses to the facts of Allegation #1:

Marlene Marin, 954-208-4073

Richard Bryant, 954-668-0062

Ryan Murphy, 954-889-4088

Broward Supervisor of Elections Joe Scott, 954-357-8683, who was not in office as Supervisor of Elections at the time, but who can validate that no campaign report was received from BRETT.

Allegation #2:

BRETT violated F.S. 104.271(2) when he, a candidate who, in a primary election or other election, with actual malice made or caused to be made any statement about me, an opposing candidate, which is false is guilty of a violation of this code. The statute reads that "an aggrieved candidate may file a complaint with the Florida Elections Commission pursuant to s. 106.25. The commission shall adopt rules to provide an expedited hearing of complaints filed under this subsection. Notwithstanding any other provision of law, the commission shall assess a civil penalty of up to $5,000 against any candidate found in violation of this subsection, which shall be deposited to the account of the General Revenue Fund of the state.

BRETT, during the election for Broward Republican State Committeeman in 2020, did with actual malice make or cause to be made multiple statements that were false about me, Richard DeNapoli, in violation of this code. These false statements involved a video which is transcribed below, as well as various Facebook posts, and emails, all made during the election which concluded on August 18, 2020.

These violations began during the 2020 election and are continuous to this day, since the video remains up. Even after I filed litigation against BRETT in July 2020, he still continues to publish these falsehoods.

While BRETT had made some posts and contacted my employers making false accusations that resulted in my initial lawsuit against Brett served on him on or about July 22, 2020, it was on August 4, 2020, that he produced a defamatory audio file. He previewed his actions on August 3, 2020, when he posted on Facebook "Stay tuned for the upcoming documentary .. "DeNapoli – Lying, Denying and Falsifying!!" by Andrew R. Brett you next elected State Committeeman!" (See Exhibit 5, Brett Facebook post dated 8/3/2020)

As stated above, it was on August 4, 2020, that BRETT produced a defamatory audio file titled "Brett Audio Project (1).mp3." (See Exhibit 6)

This was followed up with a video that same day. The video is entitled "DeNapoli – LYING – FALSIFYING – DENYING". BRETT posted the video on his YouTube channel on August 4, 2020. BRETT emailed out the video on August 5, 2020. (See Exhibit 7, email to John Hume)

You can find the original video here that was posted on August 4, 2020, which I downloaded to my personal Google Drive. This video was later revised and republished.
https://drive.google.com/file/d/1eipxprISfSBBaZ3N-N0ZBqw9HBrfle-p/view?usp=sharing

You can find the revised Brett video still on his YouTube channel, published August 12, 2020, with over 2,800 views, at https://youtu.be/8lSc1bNNpYI

I have provided a transcript of the Audio/Video below *in italics*, which my notes in **boldfaced [brackets] containing the reason why the statements he made are false:**

BEGINNING OF TRANSCRIPT OF BRETT'S VIDEO AGAINST ME CONTAINING NUMERABLE FALSEHOODS ###:

"The following is documented proof about Richard DeNapoli from 1) the Palm Beach County Sheriff's Office, 2) the Florida court documents lawsuit and case numbers, 2) six reports from the Hollywood police department, 4) national and local media documents Richard's under achievements, 5) affidavits, and 6) prior to 2006 while living in New York City Richard DeNapoli was a registered Democrat and interned at the Clinton White House." **[This sentence contains multiple false statements.]** *"A Democrat. In 2006, Richard DeNapoli filed to run for Palm Beach County Commission. He falsified an address in Wellington."* **[I made no falsification of an address. The screen of the video shows Palm Beach Sheriff's office Case # 18-134985, which is an allegation by Benjamin Bennett, another State Committeeman candidate, marked "inactive."]** *"Investigators went to the address listed. The occupants never*

heard of Richard or much less knew him." **[This gives the impression of a criminal case, when there was no follow up and the case was marked "inactive."]** "*He actually was living in Hollywood. Palm Beach County Sheriff's Office Case #18-134985. In 2006 Richard DeNapoli didn't win the Palm Beach race* **[I withdrew in qualifying week so did not actually run]** and *decides to run for Hollywood City Council and lost.*" **[False, I withdrew from the race and was not defeated.]**

"*In 2007 Richard DeNapoli applied for an appointment with Governor Crist. He misled or omitted on the application a complete or correct address.*" **[False.]** "*He was not appointed and a huge supporter of Crist and not Marco Rubio.*" **[False: I was in fact appointed to the Florida Real Estate Commission in 2007, and this is easily found in a simple google search. Also, this false statement alludes to the Crist v. Rubio Senate race in 2010, which is three years after 2007, in which I did in fact support Rubio in the general election.]**

"In 2010, he was Chairman of the Broward Republican Executive Committee and declined to run for a second term due to lack of leadership." **[False: I got a job on the west coast of Florida and chose not to run for this volunteer position.]** *"In 2010, Richard DeNapoli made racist remarks regarding Colonel Allen West saying he wouldn't become a Congressman because he was black."* **[False: there is no evidence whatsoever of me making such a statement, I would never make such a statement, and I was in fact a strong and very public and financial supporter of Allen West and his campaign.]**

"In 2011, BREC Chairman Richard DeNapoli instructed BREC Treasurer Mark McCarthy to file a false police incident report in order to try to instigate a false wire tapping claim." **[False: I never did such a thing and there is no basis or evidence for this claim, and BRETT is aware of this.]** *"On July 7, 2011, BREC Chairman Richard DeNapoli wanted former BREC Chairman and current Broward County Commissioner Chip LaMarca to file the report but Lamarca did not want to get involved with this illicit activity and refused.* **[False: Chip LaMarca was not a current Broward County Commissioner as of 2020 when this video was aired and there was no illicit activity whatsoever in 2011.]** *"Since resigning as Chairman of BREC, LaMarca was elected to represent District 4 of the Broward County Commission."*

"Corruption. In 2012, Richard DeNapoli claims to have served in the Marines but he cannot provide a DD214." **[False: I did a voluntary drop after injury from USMC Officer Candidate School (OCS) in Quantico, VA. Per materials I received from the Department of the Navy in November 2013, records showed that I enlisted in the Platoon Leader Course of the Marine Corps Reserve on October 3, 2002. I performed active duty for training from January 19, 2003 to February 10, 2003. I was disenrolled from the program on February 25, 2003 as an entry level separation.]**

"In 2015, Richard DeNapoli ordered BREC Treasurer Mark McCarthy to destroy all BREC financial records from 2015 back." **[False.]** "*Why, what was incriminating that needed to be destroyed?"* **[Brett implies incriminating behavior.]**

"In 2016, Richard DeNapoli ran for office in Sarasota and falsified his address in Venice Florida when he still lived in Hollywood." **[False. This election was in 2014 and I owned**

since 2013 and still own to this day a home at 624 Alhambra Rd., Venice, FL 34285. There was no falsification of my address and this is easy to verify with a property records search and BRETT can easily find this out.] *"In 2016, Richard DeNapoli as a candidate called opponent Benjamin Bennett at 9 PM on a Sunday night from Mangos on Las Olas Boulevard in Fort Lauderdale intoxicated stating it costs lots of money to run that you don't have. Why don't you reconsider not running."* **[False. I never made these statements and have never called Benjamin Bennett while intoxicated.]**

"In 2016, Richard DeNapoli is elected State Committeeman."

(The following section appears in the original BRETT Video posted to his YouTube account on August 4, 2020, which he also emailed out and posted on Facebook. This section was removed and the video was otherwise reposted with the same content on August 12, 2020, after an emergency injunction court hearing in Broward County Court hearing.)

At 3:04 in the original Brett video … *"In 2016, Richard DeNapoli witnesses his mother performing fellatio in the back seat of the car coming home from the Fort Lauderdale airport. The witness's name is protected. In 2017, during Richard DeNapoli's divorce, he refused to pay child support, alimony or pay for his autistic child's speech therapy. Ordered by State Judge to ante-up Case No. FMCE 17-0052030(33)."* **[These attacks are not only false but atrocious.]**

"In 2017, John Doe, aka Jeffrey Brown per Richard DeNapoli sent harassing emails to Republican business and BREC Members." **[False: I did no such thing.]** *"One in particular email was sent to a business outing a BREC member as a gay man whose name is protected who is employed there and tried extortion which failed. Case # CACE 17-019487"* **[False: I had no involvement as a plaintiff or defendant in this matter, and this video falsely claims otherwise as this BRETT video is clearly about me. This is a case by Kevin Tynan, Plaintiff, versus Jeffrey Brown, Defendant. It included "John Doe" as a placeholder defendant and then Jeffrey Brown was added. I was subpoenaed in this case as a non-party and had nothing to do with the subject matter of the suit.]**

"In 2017, Hollywood police were called to Richard DeNapoli's home for domestic violence two times however were called four previous times to the same address per Hollywood police records number 331770408916 and 331704079506." **[Police were called to my house by my then wife for a "domestic disturbance" specifically identified on the report as "non crime." The second record number cited was just a follow up to the same original call per the records. See Exhibits 8 and 8B. There was no evidence of any physical violence and even the judge in my divorce case stated that "Wife raised, for the first time at trial, the unsupported allegation that Husband physically assaulted her. The Court rejects this claim as not credible and false." The "four previous times" the police were called to my address in Hollywood were related to two separate burglary matters where I was the victim and a renter contacting the police while I was living in Sarasota.]**

"In 2017, Richard DeNapoli ran a prostitution ring from his home and website pay for play per a website search." **[This is absolutely false with no basis in fact. I have not done any such thing and do not understand where Brett would ever come up with these allegations.]**

"In 2017, Richard DeNapoli paid Rico Petrocelli $75,000 from the BREC Treasury...for what?" **[False: I had no such control over the BREC Treasury and the Supervisor of Elections records can easily show that this allegation never occurred. Brett is likely conflating two different periods in time. Rico Petrocelli served as the Executive Director of BREC from 2010-2012, whereupon during the course of those two years he was paid approximately $75,000 by BREC after being hired through a vote by the BREC Executive Board. Additionally, Brett posts a picture of Anthony Weiner during this moment in the video making further implications.]**

"In 2017, Rupert Tarsey, business partner and Richard DeNapoli are bedfellows of a corruption and deceit documented by BREC records and national media." **[False: BRETT claims "corruption and deceit" and provides no details as there was neither committed by me.]**

"In 2017 Richard DeNapoli twice verbally assaulted a Navy Veteran and Vice Chairwoman of BREC, Celeste Ellich." **[False: There was no "assault" is this false claim was debunked long ago. I have never been arrested nor charged for any "assault", which is a misdemeanor under Chapter 784, Florida criminal Statutes. This is yet another false claim by BRETT that can easily be debunked.]**

"In 2017 Richard DeNapoli at Stingers in Pompano Beach. Broward Sheriff's office was called for continued assaults by Richard DeNapoli on Vice Chairwoman BREC Committeewoman Celeste Ellich." **[False: This restates the prior sentence and claims that I performed the crime of continued "assaults" when I did not. BRETT is aware of how his friend Ben Bennett made the call to the police, and that no arrests or charges were filed because this claim was false.]**

"In 2018, Richard DeNapoli sold a Republican list to Democrats for $500 paid to the order of Praetorian Counseling to 6722 NW 122nd Ave., Parkland FL 33076. Candidate Judge Walter Dale Miller came forward and declined to purchase that list. How many others did purchase it?" **[False: I sold no such list and do not have anything to do with that address. This is another false claim that Brett knows was debunked and states the claim as a fact when it is false.]**

"In 2018, Richard DeNapoli gave State Representative Chip LaMarca $29,000 for flat screen TVs, why?" **[False: This is a ludicrous claim that has no basis in fact.]**

"In 2019, Richard DeNapoli again applied for an appointment with Governor DeSantis. Again he misled or omitted the application with incomplete addresses. Word on the street is from protected source, Richard will never be appointed by Governor DeSantis for anything." **[False: I made no applications with omitted or incomplete addresses, and Brett makes further claims of hearsay acting as if he is a reporter.]**

"In 2019, Richard DeNapoli willingly refused to charter a trump club with BREC per Chairman Moraitis and refused with other club applications as well." **[Here Brett once again claims without providing evidence that either 1) Chairman Moraitis is claiming I refused to charter a Trump club with BREC when in fact I am but one of three votes or 2) alternatively and falsely that I have some influence over Moraitis and caused him to make that decision. It is difficult to ascertain what Brett's claims are here when he frequently uses the "per Richard DeNapoli" statement.]**

"In 2019, Richard DeNapoli willingly brought a high-ranking Democrat from Chicago and friend of president of Obama Broward School Superintendent Robert Runcie to speak as a guest speaker at a BREC meeting. Again, proof Richard DeNapoli and the entire executive committee were supporting Democrats. We need Nancy Cooke's secretary report showing there was nobody voting against this." **[False: I had nothing to do with bringing Runcie to the BREC meeting. He was invited by Chairman Moraitis. The fact that Brett says he needs the secretary report shows BRETT is making the claim without evidence.].**

"In 2019, Richard DeNapoli willingly did not file the Log Cabin Republicans of Broward charter to the Republican Party of Florida." **[False: I am not responsible for filing this charter nor did I have the application to file. It was BRETT's responsibility to do this.]**

"In 2020, Chairman George Moraitis and Richard DeNapoli tried to silence the Log Cabin Republicans of Broward and President Andrew R. Brett by not using the Log Cabins of Broward when this club is a chartered member of the national Log Cabin Republicans organization and Andrew R. Brett is recognized as the organization's current president. Are the Chairman George Moraitis and Richard DeNapoli homophobic, racist and against veterans?" **[Brett here falsely claims that myself and Moraitis tried to "silence" him and the club. I am aware of an emailed takedown notice from Moraitis dated June 24, 2020, to Andrew Brett asking him to cease using the word "Republican" in his club title because his organization had not submitted the paperwork for rechartering despite repeated requests. Additionally, somehow BRETT manages to imply that Moraitis and me are "homophobic, racist, and against veterans." Once again, the takedown notice was not even sent by me. See Exhibit 9]**

"In 2020, Richard DeNapoli claims to have raised $500,000 for BREC. Where is it?" **[I made it clear that I helped raise this money during my many years with the organization and serving as chair or co-chair of various fundraising events. All fundraising is on the Broward Supervisor of Elections reports.]**

"In 2020, Richard DeNapoli's campaign site says if you donate $20 or more you'll get a Make Broward Great Again Hat. The FEC States you cannot do this. It's a campaign violation." **[FALSE: There is no prohibition to such a practice, as it is commonly done by state and federal candidates. Brett's accusation is thus a violation of 104.271(1), where Brett is "willfully charging [me,] an opposing candidate participating in such election with a violation of any provision of this code [Chapter 104], which charge is known by the candidate making such charge to be false or malicious…" Brett is making so many charges in this video and in other mediums that it is malicious.**

"In 2020, Richard DeNapoli continues false claims of being endorsed by Republican organizations. This fact is checked and its more lies." **[False. I was endorsed by many people and groups.]**

"In 2020, the BREC office is closed normal business hours during the primary." **[While not directly relating to me, this was likely false. I was not in charge of the BREC office during this time.]**

"In 2020, current girlfriend Shea Donahue runs a dating agency in Palm Beach County, www.revolutiondating.com." **[False: Ms. Donahue worked for the dating agency through the later part of 2019 but never owned or ran the agency. She was an employee among many.]**

"In 2020, Broward County is last out of 67 Florida counties for Republican registrations. Again, a failure showing Richard DeNapoli's lack of leadership." **[False: in raw numbers, I am sure Broward had more new Republican registrations than other counties in Florida, and as I am not the party chairman, I don't know why this is directed at me.]**

"In 2020, he has filed two frivolous lawsuits against Republican candidates Andrew Russell Brett and Benjamin Bennett, for exposing the real Richard DeNapoli." **[While I did file these lawsuits in Broward County, they were not deemed frivolous by the Court.]** *"Is Richard DeNapoli against the first amendment, freedom of speech in the political arena? Another tactic of Richard DeNapoli, intimidation and bullying."* **[It is not intimidation or bullying to protect oneself against defamation.]**

Gold Coast Republicans was formed by Richard DeNapoli with three members. Where are the financials? **[Here, Brett implies that this Republican club is a reporting entity, when in fact it is not required to file reports.]**

"Richard DeNapoli's campaign website states he created many Republican clubs. That's one club....and declined to add other chartered club applications, picking and choosing clubs to add and discriminating against others." **[My campaign website stated that I "founded and co-founded Republican Clubs in Broward!" I founded the Republican Club of Greater Hollywood, and co-founded the Gold Coast Republican Club, and assisted in chartering many others. I certainly did not "discriminate" against others, and in fact assisted the Log Cabin Republican Club over the years, which BRETT was and is aware of.]**

"Richard DeNapoli clearly has a pattern of racism, homophobia, anti-veterans, not telling the truth, bullying, corruption and intimidation." **[False on all counts.]**

"Richard DeNapoli has violated the Republican Party of Florida loyalty oath many times and cannot be brought up on said charges as he's the chairman of the Grievance Committee." **[False: There has never been any conviction of me by the Republican Party of Florida for a loyalty oath violation. BRETT is aware that prior accusations by political opponents of mine were dismissed by the Grievance Committee when I was not a member of the Grievance Committee. Yes, I am the Chairman of the Grievance Committee currently but there is a process for someone making a complaint against me if need be.]**

"Richard DeNapoli was appointed by Republican Party of Florida Chairman Joe Gruters to be Chairman of the Grievance Committee where many grievances has been filed against Richard DeNapoli and have never been heard." **[False: a grievance was re-filed against me on or about the day I was appointed Grievance Chair in what was most assuredly a political stunt. This grievance against me had just been dismissed by the prior Grievance Committee and thus was invalid as there is no such process to re-file a grievance for the same accusation when the matter has already been heard.]**

"Seeing a pattern here of corruption and deceit within the Republican Party of Florida and BREC? BREC has refused to provide Broward State Committee candidates the BREC Membership List. Folks, you can see by the factual, documented, evidence facts that Richard DeNapoli has a history of lying, denying and falsifying during his career representing Broward County." **[False: these accusations are not based in fact, and I have not done the things Brett accused me of.]**

"The time has come to remove this virus and elect Andrew Russell Brett as your next Broward County State Committeeman. Remember to vote on August 18th."

END OF TRANSCRIPT ###.

BRETT posted these audio/video attacks after he was served with my suit. (See Exhibit 10, containing various images.) He even posted in a video on the night of August 6, 2020 that he was sending the attack to other politicians throughout the state of Florida. He also caused the video to be texted to many people throughout the state of Florida who could not even vote in the election. This was all meant to damage my reputation.

BRETT knew these claims in the audio/video/posts were false. The sheer volume of falsities shows their maliciousness, as well as the fact that I had sued BRETT for defamation in July 2020 and this video was produced after the suit was filed. Even after the emergency court hearing held regarding this video on August 12, 2020, which was filed on August 6, 2020, BRETT continued to post these attacks when he knew that I was claiming they were false. Some of BRETT's accusations involve criminal activity, such as running a prostitution ring, for which there is no evidence whatsoever and for which I obviously did not do. On their face, such accusations are false and defamatory.

BRETT's citation to various documents shows that he was well aware of their content and how to research the background of his claims. Anyone researching these matters can easily find out that they were false as I have never been arrested let alone charged for anything outside of civil infractions for traffic tickets. I am an attorney in good standing with the Florida Bar as well as the Chief Trust Officer of a Florida-chartered trust company regulated by the Florida Office of Financial Regulation and have a clean record.

The documents BRETT cited on their face disprove the claims he is making as he can clearly research the outcome of the claims, which are all merely allegations made. BRETT states these claims and allegations as facts in his audio/video attack, which is why his claims are false and in violation of F.S. 104.271.

ALLEGATION #3

BRETT violated F.S. 104.271(1) when he, a candidate who, in a primary election or other election, willfully charged me, an opposing candidate participating in such election with a violation of any provision of this code, which charge is known by the candidate making such charge to be false of malicious, is guilty of a felony of the third degree.

As referenced above in the Transcript of the Audio/Video, BRETT claimed that ***"In 2020, Richard DeNapoli's campaign site says if you donate $20 or more you'll get a Make Broward Great Again Hat. The FEC States you cannot do this. It's a campaign violation."*** This statement is false as there is no prohibition to such a practice, as it is commonly done by state and federal candidates as well as political committees. Governor DeSantis currently is offering similar items on his website. Brett's accusation is thus a violation of 104.271(1), where Brett is "willfully charging [me,] an opposing candidate participating in such election with a violation of any provision of this code [Chapter 104], which charge is known by the candidate making such charge to be false or malicious…" Brett is making so many charges in this video and in other mediums that it is malicious and he shows his awareness of things by citing various documents that easily disprove what he is claiming.

General Witness to Allegations #2 and #3:

Michele Merrell, 954-540-0366

John Hume, recipient of the video via email: 954-493-7927

Evan Power, 850-519-1062

CONCLUSION

I would like the Florida Elections Commission to investigate and prosecute these above claims and believe there to be ample evidence supporting them.

Sincerely,

Richard DeNapoli

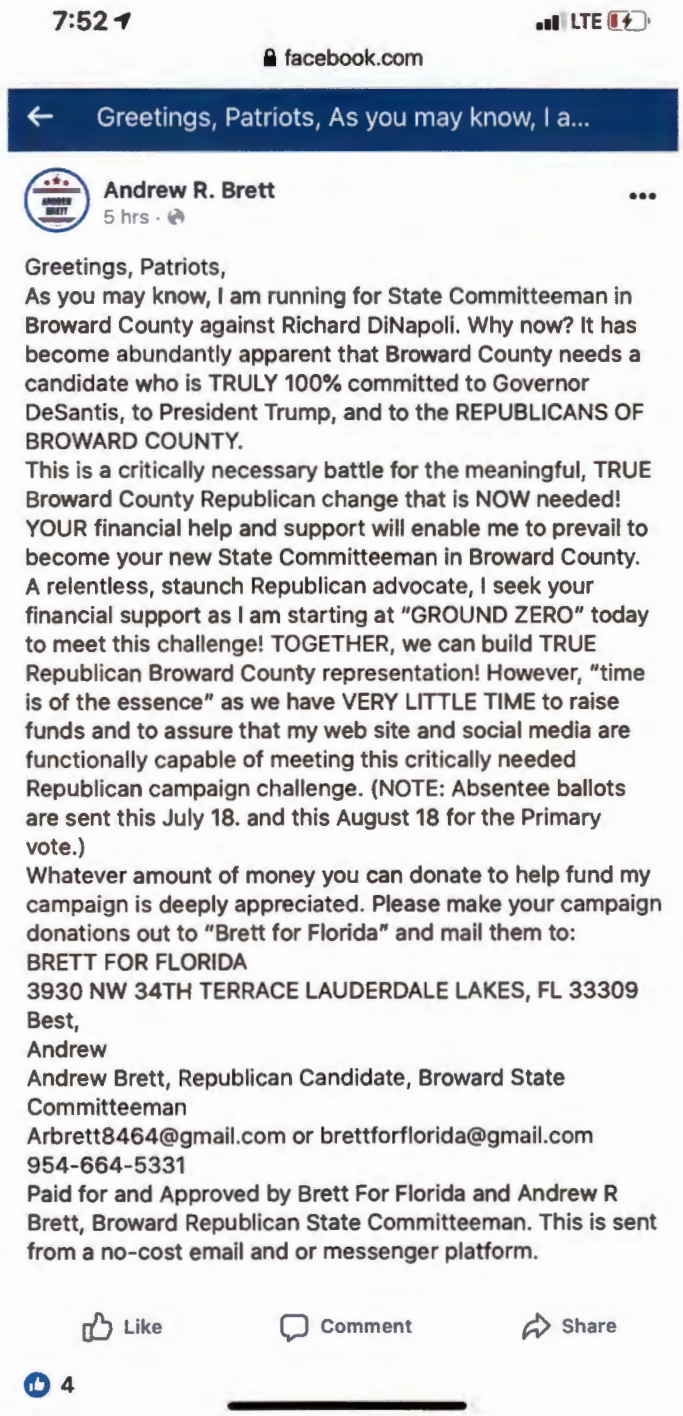

7:52
LTE
facebook.com
Greetings, Patriots, As you may know, I a...
Andrew R. Brett
5 hrs ·
Greetings, Patriots,
As you may know, I am running for State Committeeman in Broward County against Richard DiNapoli. Why now? It has become abundantly apparent that Broward County needs a candidate who is TRULY 100% committed to Governor DeSantis, to President Trump, and to the REPUBLICANS OF BROWARD COUNTY.
This is a critically necessary battle for the meaningful, TRUE Broward County Republican change that is NOW needed! YOUR financial help and support will enable me to prevail to become your new State Committeeman in Broward County. A relentless, staunch Republican advocate, I seek your financial support as I am starting at "GROUND ZERO" today to meet this challenge! TOGETHER, we can build TRUE Republican Broward County representation! However, "time is of the essence" as we have VERY LITTLE TIME to raise funds and to assure that my web site and social media are functionally capable of meeting this critically needed Republican campaign challenge. (NOTE: Absentee ballots are sent this July 18. and this August 18 for the Primary vote.)
Whatever amount of money you can donate to help fund my campaign is deeply appreciated. Please make your campaign donations out to "Brett for Florida" and mail them to:
BRETT FOR FLORIDA
3930 NW 34TH TERRACE LAUDERDALE LAKES, FL 33309
Best,
Andrew
Andrew Brett, Republican Candidate, Broward State Committeeman
Arbrett8464@gmail.com or brettforflorida@gmail.com
954-664-5331
Paid for and Approved by Brett For Florida and Andrew R Brett, Broward Republican State Committeeman. This is sent from a no-cost email and or messenger platform.
Like
Comment
Share
4

EXHIBIT 1


12:31
AA
facebook.com
Andrew R. Brett
June 11 at 1:57 PM
THANK YOU FOR THE HUGE DONATION!! YOU KNOW WHO YOU ARE XOXO😍 #WINNING
Like
Comment
Share
13
Scott Newmark
just tell us. Why make us wait for the public finance reports.
2
3 wks Like Reply More
Andrew R. Brett replied · 1 reply
Richard Bryant
Your welcome but I didn't think I would call $20 huge 🤔
3 wks Like Reply More

EXHIBIT 2


12:31
AA
facebook.com
THANK YOU FOR THE HUGE DONATION!! YOU KNOW WHO YOU ARE XOXO😍
#WINNING
Like
Comment
Share
13
Scott Newmark
just tell us. Why make us wait for the public finance reports.
2
3 wks Like Reply More
Andrew R. Brett replied · 1 reply
Richard Bryant
Your welcome but I didn't think I would call $20 huge 🤔
3 wks Like Reply More
Andrew R. Brett
Thank you Richard I just got your donation today xoxoxoxoxo
1
3 wks Like Reply More

EXHIBIT 28

9:26 LTE

AA facebook.com

Y'all need to be talking about Act Blue the way y'all talk about the 2nd collection plate and the love offering for the visiting pastors in church... But no, you will continue to let the people come in your pulpits to offer false hope and lies before the congregation every four years.

If you donate to BLM and think that your coin is truly helping a... More

Like Comment Share

Andrew R. Brett
15 mins ·

THANK YOU TO THOSE WHO ARE SENDING IN DONATIONS FOR MY CAMPAIGN....

EVERY DOLLAR HELPS... PLEASE IF YOU CAN $5 $10 $1000

MAKE CHECKS PAYABLE TO:
BRETT FOR FLORIDA
3930 NW 34TH TERRACE
LAUDERDALE LAKES, FL.... More

2 1 Share

Like Comment Share

EXHIBIT 5

Marlene Marin
2h ·

Do not vote for Andrew Brett as a committeeman. He is a lyer a thief and will use you for what he can get. He ordered shirts from me for his campaign. . I delieved them to his house on a Tuesday. He told me ill zelle you the money by Saturday. I waited all day . figured i would trust him since he was a friend. I asked him Saturday and never saying anything. he never paid me. and then when I asked him again he blocked me. Then I called his partner ryan who paid me 100 dollars out of his own money so now he still owes me 100. . ANDREW BRETT IS A SCAMMER AND A LYER DONT TRUST HIM FOR COMMITTEEMAN

10 8 Comments 2 Shares

Like Comment Send

Janet Klomburg
You gotta be kidding me!

Marlene Marin
Janet I wish i was. when i told him when will i expect the money he bloc... See More

EXHIBIT 4

8:13

facebook.com

Andrew R. Brett
1 hr ·

It's appalling and extremely disingenuous that a fellow Republican and Ambassador For Americans For Trump can be so callous and mean spirited to me. Those who KNOW ME can and will attest that I AM NOT those as she claims and described!! FACT
I was advised that the 24 t-shirts were an in kind contribution and wasn't made aware till 10 minutes till she arrived at my home it was $200. If I knew at the onset-- I sure would NOT have moved forward whatsoever! FACT!!
Due to her antics and blasphemy, I have requsted to President of Americans For Trump Scott Newmark that she and her husband be banned today from the organization and both be stripped from their Ambassador status.
She also contacted me to write a FALSE review of her daughter's pet sitting business which I know nothing about nor her daughter norr how she treats animal's! Again, I DON'T lie and did not write the review.

Now moving forward 😁

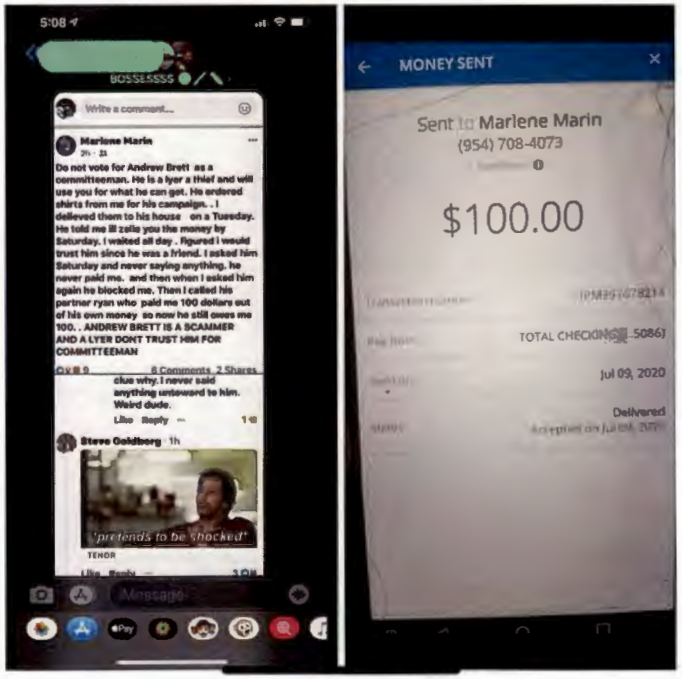


Exhibit 48

10:08 LTE

facebook.com

2 7 Shares

Like Comment Share

Andrew R. Brett
1 hr ·

Stay tuned for upcoming documentary..
"DeNapoli - Lying, Denying and Falsifying!!"
By Andrew R.Brett you next elected State Committeeman!

9 1 Comment 7 Shares

Like Comment Share

Olive Simmons ▸ Andrew R. Brett
1 hr ·

Happy Birthday Andrew!

1 Comment

*

EXHIBIT 5

DeNapoli- A Documentary of Lying- Denying - and - Falsifying

rdenapoli@yahoo.../Inbox

Andrew Brett <arbrett8464@gmail.com>
To: **Mary Sturm** <marysturm22@gmail.com>
Bcc: **rdenapoli@yahoo.com**

Aug 4, 2020 at 3:13 PM

Worth 10 Minutes of your time!!

2 Files 9.1MB

Brett Audio Project (1).mp3
9MB

Capture (1) (3).PNG
22kB

EXHIBIT 6

Re: DeNapoli- A Documentary of Lying - Denying - and - Falsifying by Andrew R Brett rdenapoli@yahoo.../Sent

Richard DeNapoli <rdenapoli@yahoo.com> Aug 5, 2020 at 2:08 PM
To: **John Hume** <johnhume@comcast.net>

Thank you for sending it. A defamation case has been filed.

—Richard DeNapoli
*This email is intended only for the use of the party to which it is addressed and may contain information that is privileged, confidential, or protected by law. If you are not the intended recipient, or the employee or agent responsible for delivering this document to the intended recipient, you are hereby notified that any dissemination, copying or distribution of this email or its contents is strictly prohibited. If you have received this message in error, please notify me immediately by telephone or by replying to the message and deleting it from your computer. Thank you *

On Aug 5, 2020, at 1:52 PM, John Hume <johnhume@comcast.net> wrote:

FYI
john

From: Andrew Brett [mailto:arbrett8464@gmail.com]
Sent: Wednesday, August 05, 2020 1:27 PM
To: johnhume@comcast.net
Subject: Re: DeNapoli- A Documentary of Lying - Denying - and - Falsifying by Andrew R Brett

video version
https://www.youtube.com/watch?v=eQF6iLR-RK0&feature=youtu.be&fbclid=IwAR2HcC5qSjuZrO9RPcVRAmYws_ZTF9BggrvU5jlVSvEpMSrYtqGs3tlwwho

On Tue, Aug 4, 2020 at 4:29 PM Andrew Brett <arbrett8464@gmail.com> wrote:
WITH THE 10 MINUTES... PLEASE SHARE

Virus-free. www.avast.com

EXHIBIT 7

REPORTING OFFICER NARRATIVE

Hollywood Police Department		OCA 33-1704-078916
Victim	Offense *DOMESTIC DISTURBANCE (NON-CRIME)*	Date / Time Reported *Wed 04/26/2017 18:44*

ON 4/26/2017 AT APPROXIMATELY 1845HRS I RESPONDED TO 4416 JACKSON ST IN REFERENCE TO A DOMESTIC DISTURBANCE.

CONTACT WAS MADE WITH REPORTEE, BRIGITA DENAPOLI. DENAPOLI STATED SHE SERVED HER HUSBAND, IDENTIFIED AS RICHARD DENAPOLI, WITH DIVORCE PAPERS THIS MORNING. BRIGITA STATED RICHARD CAME HOME AND BEGAN TO ARGUE. BRIGITA STATED SHE CALLED POLICE UPON HIS ARRIVAL. BRIGITA STATED THE INCIDENT WAS CONTAINED TO A VERBAL ARGUMENT ONLY.

CONTACT WAS MADE WITH RICHARD DENAPOLI. RICHARD STATED HE RETURNED HOME TO GRAB SOME OF HIS BELONGINGS AND HIS WIFE, BRIGITA, BEGAN CALLING POLICE. RICHARD STATED THE INCIDENT WAS CONTAINED TO A VERBAL ARGUMENT ONLY. RICHARD STATED HE WOULD SPEND THE EVENING AT A FRIENDS HOUSE.

NO MARKS OR BRUISING WERE OBSERVED ON ANY PARTIES. IT APPEARS THE INCIDENT WAS CONTAINED TO A VERBAL DISPUTE AT THIS TIME.

BOTH PARTIES WERE PROVIDED WITH A HOLLYWOOD POLICE DEPARTMENT CASE NUMBER AND INFORMATION ON HOW TO OBTAIN A RESTRAINING ORDER.

EXHIBIT 8

Hollywood Police Department

OCA: ***331704078916***

THE INFORMATION BELOW IS CONFIDENTIAL - FOR USE BY AUTHORIZED PERSONNEL ONLY

Case Status: *INACTIVE* **Case Mng Status:** *INACTIVE* **Occurred:** *04/26/2017*

Offense: *DOMESTIC DISTURBANCE (NON-CRIME)*

Investigator: *QUINTERO, V. (3461)* **Date / Time:** *04/27/2017 16:17:32, Thursday*

Supervisor: *ZEIDELL, J. (2815)* **Supervisor Review Date / Time:** *05/10/2017 20:36:05, Wednesday*

Contact: **Reference:** *Follow Up*

COMPLAINANT ADVISED HE HAD LEFT HIS RESIDENCE ON 4/26/17 IN ORDER TO AVOID A FUTURE ALTERCATION WITH HIS WIFE IN REFERENCE TO A PREVIOUS DOMESTIC DISTURBANCE. OFFICERS STOOD BY HIS RESIDENCE AT 4612 JEFFERSON STREET WHILE HE SPOKE TO HIS WIFE. BOTH PARTIES ADVISED THEY WOULD BE RESIDING TOGETHER UNTIL THE DIVORCE IS FINALIZED.

NO FURTHER ACTION WAS TAKEN.

EXHIBIT 8B

3461

Investigator Signature

2815

Supervisor Signature

EXHIBIT 9

Letter to Andrew Brett

From: George Moraitis Jr (gmoraitisjr@mcklaw.com)

To: brecexec@gmail.com

Cc: flpowers@bellsouth.net; rdenapoli@yahoo.com; mmerrell3@msn.com; jeffb@topofgoogle.com; cookenancy@aol.com

Date: Wednesday, June 24, 2020 at 01:53 PM EDT

Lauren,

Please format this as email from my chairman@browardgop.org account and blind copy the members of the board. After reviewing this again and seeing some of what Nancy showed me I think we are past the point of needing to be be overly polite and the language Richard proposes strikes the right tone. I did make Jeff's correction and please send this out on my behalf.

Sincerely,
George

Dear Mr. Brett,

We have noticed that you are representing yourself as the President of the Log Cabin Republicans of Broward, or other similar names, in repeated emails, Facebook pages, and online methods. We have pasted a recent example below.

Unfortunately, you cannot use the name, abbreviation and symbols of the Republican Party in any format whatsoever unless your organization has gone through the chartering process, which you have failed to do, despite repeated requests from BREC to finish your paperwork. This is an immediately effective takedown notice of all your claims to be President of a Republican club or that the club itself is currently a Republican Club. We write this with no ill will towards the organization, but the fact remains that you have not gone through the chartering process. In the event you do not wish to complete the chartering process, then you must change the name of your organization to remove reference to the name, abbreviations and symbols of the Republican Party.

RULE 1 - Chartering Process for Republican Clubs
A. Restrictions on Use of the Name, Abbreviations, and Symbols of the Republican Party
No person or group of persons may use the name, abbreviations, or symbols of the Republican Party in connection with any club, group, association, or organization of any kind unless approval and permission have been given by the Republican Party of Florida in the form of a written charter issued under this Rule.

We have also noticed that you as the purported President of this organization have posted numerous accusations against BREC and its officers.

Even if you were a chartered club, which you are not, then these attacks and promotions of your own campaign would not be permitted per Article VIII of the required bylaws for chartered clubs as well as the Party Rules of Procedure of the Republican Party of Florida. Any customization of individual club bylaws cannot conflict with the Model bylaws or Party Rules listed herein. You are not a chartered club at this time, but even if you were then this activity would not be allowed under the rules.

I am sure this is an oversight, and since the rules are clear this is to officially request an immediate takedown of these materials since they are all in violation of party rules.

SAMPLE BYLAWS
ARTICLE VIII- ENDORSEMENTS & INTRA-PARTY DIFFERENCES
Pursuant to the Republican Party of Florida Rules of Procedure, no chartered club or organization using the name Republican shall participate in intra-party differences, nor shall it, as an organization, seek to influence the nomination or election of any Republican over

another Republican unless the County Executive Committee has endorsed one Republican over another. Then the Club may seek to influence the election of the candidate endorsed by the County Executive Committee. Chartered clubs shall not entertain motions to adopt platform positions on issues or endorse candidates except that they may entertain such motions to take the same position or endorse the same candidate as the County Executive Committee has taken. Under no circumstances shall a chartered club invite a non-Republican to be a guest speaker at a club meeting or function without prior approval of the County Republican Executive Board. The Chairman of the Republican Party of Florida shall be the authority with respect to internal disputes referred by any Club or member of a Club chartered under this rule.

PARTY RULES OF PROCEDURE
REPUBLICAN STATE EXECUTIVE COMMITTEE OF FLORIDA
D. Restrictions on Activities by Chartered Republican Clubs
Chartered Republican clubs must conduct their affairs in compliance with applicable
state and federal election and campaign finance laws. No chartered club, group, association, or organization may adopt by-laws that are inconsistent with state or federal law, the Constitution
or Party Rules of Procedure of the Republican State Executive Committee, or the Republican Party of Florida County Model Constitution. No chartered club, group, association, or
organization may participate in intra-party differences, nor may it, in its official capacity as a
chartered organization, support the nomination of one Republican candidate over another

unless the Republican Party has voted to endorse that candidate under Rule 8. No chartered club, group, association, or organization may invite a non-Republican to be a guest speaker at an official meeting or function without the approval of the Chairman of the County Republican Executive Committee.

Best regards,

George Moraitis, Chairman, Broward Republican Party

Sincerely,
George

George R. Moraitis, Jr.
Moraitis, Cofar, Karney, Moraitis & Quailey
915 Middle River Dr. Suite 506
Fort Lauderdale, FL 33304
(T) 954-563-4163
(F) 954-563-5913
gmoraitisjr@mcklaw.com
www.mcklaw.com

EXHIBIT 10

11:53

AA facebook.com

Photos Life Events

Andrew R. Brett
45 mins ·

https://www.youtube.com/watch?v=8lSc1bNNpYI

YOUTUBE.COM
DeNapoli - LYING - FALSIFYING - DENYING
DeNapoli - LYING - FALSIFYING - DENYING

Like Comment Share

Andrew R. Brett
1 hr ·

7:12

facebook.com

1 hr Like Reply More

Benjamin Bennett
And the truth shall set you free 1
1 hr Like Reply More

Benjamin Bennett
OOOOORRRRRAAAAA! 1
1 hr Like Reply More

Patty Gilliland
Hello from Clearfield
1 hr Like Reply More

Andrew R. Brett
https://youtu.be/eQF6iLR-RK0

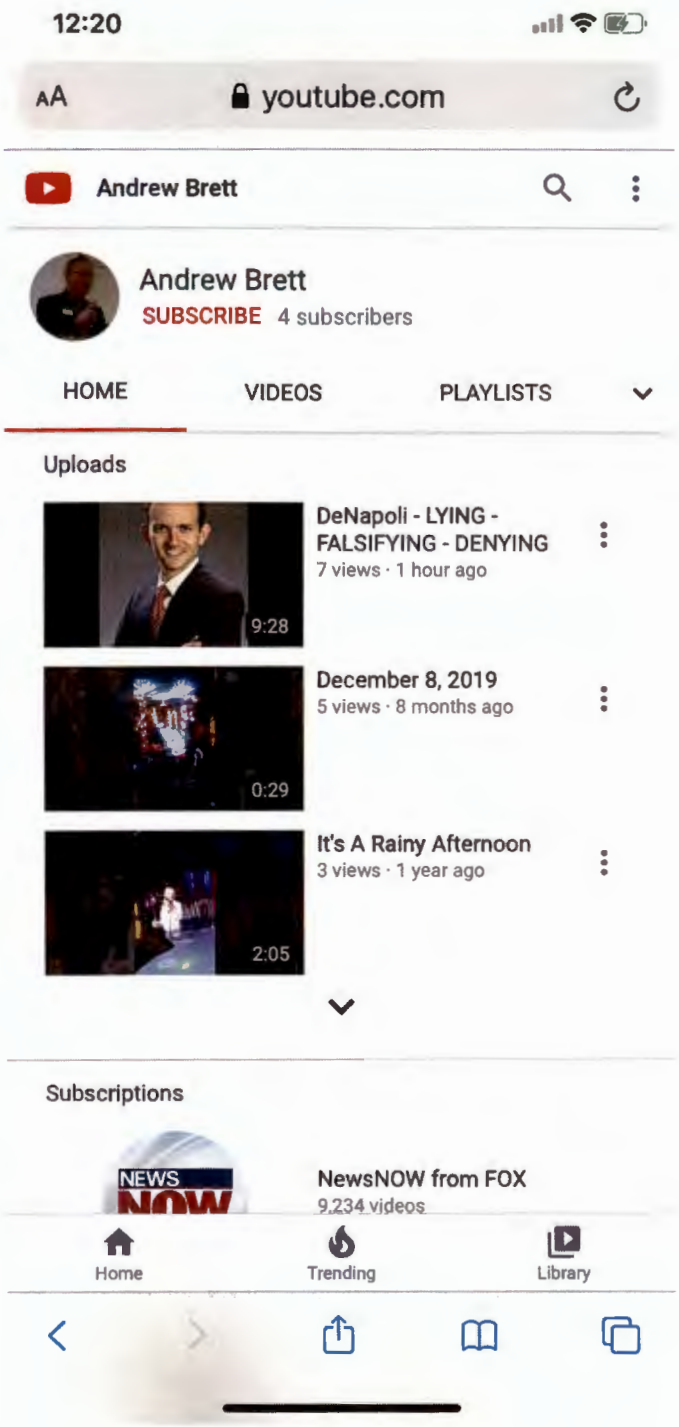
Brett For State Committeeman
youtube.com
1 hr Like Reply More

Andrew R. Brett
Hi Mayor **Patty Gilliland**
1 hr Like Reply More

Duane Coker
Amen sir
9 mins Like Reply More

Duane Coker
DiNapoli continually verbally assaults Celeste. I wish I would have been in that room. Would not have needed BSO.
6 mins Like Reply More

Write a comment... Post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45 mins ·

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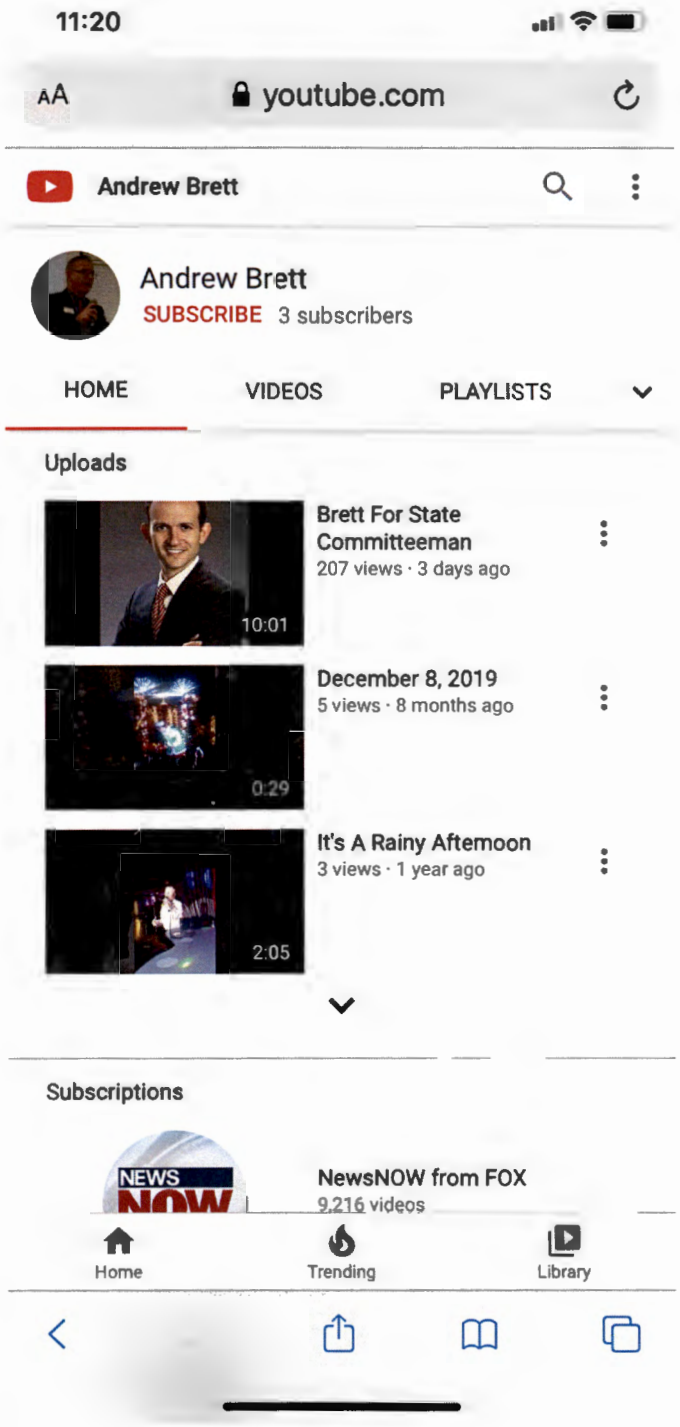
YOUTUBE.COM
DeNapoli - LYING - FALSIFYING - DENYING
DeNapoli - LYING - FALSIFYING - DENYING

Like Comment Share

Andrew R. Brett
1 hr ·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5 views · 8 months ago
2:05
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Library

ORIGIN ID:JDMA (954) 488-1890
RICHARD DENAPOLI

255 ALHAMBRA CIRCLE
333
CORAL GABLES, FL 33134
UNITED STATES US

SHIP DATE: 02AUG22
ACTWGT: 0.50 LB
CAD: 5168339/INET4490

BILL SENDER

TO **FLORIDA ELECTIONS COMMISSION**

107 WEST GAINES STREET
STE. 224
TALLAHASSEE FL 32399

(850) 922-4539
INV:
PO:
REF:
DEPT:

581J2/F39D/FE4A

J222822841201uv

FedEx Express

TRK# 0201 **7775 5746 5825**

WED - 03 AUG 10:30A
PRIORITY OVERNIGHT

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32399
FL-US **TLH**

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