STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

In Re:	Vets and Families for Truth	Case No.:	FEC 17-408	
		1		

TO: Vets and Families for Truth Curtis McClees, Chair 950 Blanding Blvd., Suite 19 Orange Park, FL 32065 Division of Elections 500 S Bronough Street, Room 316 Tallahassee, FL 32399

NOTICE OF HEARING (INFORMAL)

A hearing will be held in this case before the Florida Elections Commission on, May 14, 2019 at 8:30 am, or as soon thereafter as the parties can be heard, at the following location: Senate Office Building, 404 South Monroe Street, Room 110-S, Tallahassee, Florida 32399. Due to heightened security access requirements, please bring only essential items into the building and plan to arrive early to allow for delays coming through security.

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 April 30, 2019 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.

FILED

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STATE OF FLORIDA

ELECTIONS COMMISSION

STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

Florida Elections Commission, Petitioner,

v.

Vets and Families for Truth,

Respondent.

/

ORDER OF PROBABLE CAUSE

THIS MATTER was heard by the Florida Elections Commission (Commission) at its regularly scheduled meeting on February 26, 2019, in Tallahassee, Florida.

On December 18, 2018, 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 September 16, 2016, Vets and Families for Truth violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2016 G1A Report.

Count 2:

On or about October 7, 2016, Vets and Families for Truth violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2016 G3 Report.

Count 3:

On or about October 30, 2016, Vets and Families for Truth violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2016 D2 Report.

Count 4:

On or about October 31, 2016, Vets and Families for Truth violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2016 D3 Report.

Count 5:

On or about November 4, 2016, Vets and Families for Truth violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2016 G7 Report.

DONE AND ORDERED by the Florida Elections Commission on February 26, 2019.

M. Scott Thomas, Chairman Florida Elections Commission

Copies furnished to: Wilson Brantley, Florida Elections Commission Curtis McClees, Chair for Respondent Division of Elections, Complainant

NOTICE OF RIGHT TO A HEARING

As the Respondent, you may elect to resolve this case in several ways. First, you may elect to resolve this case by <u>consent order</u> 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 <u>informal hearing</u> held before the Commission, if you <u>do not</u> 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 <u>formal hearing</u> 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: Vets and Families for Truth Case No.: FEC 17-408

TO: Vets and Families for Truth Curtis McClees, Chair 950 Blanding Blvd., Suite 19 Orange Park, FL 32065 Division of Elections 500 S Bronough Street, Room 316 Tallahassee, FL 32399

NOTICE OF HEARING (PROBABLE CAUSE DETERMINATION)

A hearing will be held in this case before the Florida Elections Commission on, **February 26, 2019 at 9:30 am,** *or as soon thereafter as the parties can be heard*, at the following location: **Senate Office Building, 404 South Monroe Street, Room 110-S, Tallahassee, Florida 32399.** Due to heightened security access requirements, please bring only essential items into the building and plan to arrive early to allow for delays coming through security.

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

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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, J.D.

Executive Director Florida Elections Commission February 11, 2019 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.

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

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

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

STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

In Re:	Vets and Families for Truth	•	Case No.:	FEC 17-408

STAFF RECOMMENDATION FOLLOWING INVESTIGATION

Pursuant to Section 106.25(4)(c), Florida Statutes, undersigned staff counsel files this written recommendation for disposition of the referral in this case recommending that there is **probable cause** to charge Respondent with violating **Section 106.07(7)**, **Florida Statutes**. Based upon a thorough review of the Report of Investigation submitted on November 1, 2018, the following facts and law support this staff recommendation:

- 1. On November 9, 2017, the Florida Elections Commission ("Commission") received a referral from the Department of State, Division of Elections ("Division"), alleging that Vets and Families for Truth ("Respondent") violated Chapter 106, Florida Statutes.
- 2. Respondent is a political committee registered with the Division of Elections. (ROI Exhibit 1, page 3-4)¹
- 3. By letter dated August 9, 2018, the Executive Director notified Respondent that Commission staff would investigate the following statutory provisions:

Section 106.07(7), Florida Statutes: As alleged in the complaint, Respondent, a political committee, may have failed to notify the filing officer on the prescribed reporting date that no report would be filed on that date because it had not received funds, made contributions, or expended reportable funds during the 2016 G1A, 2016 G3, 2016 D2, 2016 D3, and 2016 G7 reporting periods.

4. By letter dated July 28, 2016, Kristi Reid Bronson, Chief, Bureau of Election Records, sent Respondent a letter acknowledging that the Division had received its Appointment of Campaign Treasurer and Designation of Campaign Depository for Political Committees form and that its name was placed on the 2016 active committee list as a political committee. (ROI Exhibit 2, page 1)

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

- 5. The acknowledgment letter advised Respondent that all candidates filing reports with the Division are required to use the Electronic Filing System ("EFS") and provided Respondent with a user identification number and initial password to access to the EFS. (ROI Exhibit 2, page 1) The letter further advised Respondent that all of the Division's publications and reporting forms were available on its website, and directed Respondent to print out the *Calendar of Reporting Dates*, as well as other relevant documents. (ROI Exhibit 2, page 3)
- 6. Pursuant to Section 106.07(7), Florida Statutes, in any reporting period during which a political committee has not received funds, made any contributions, or expended any reportable funds, the filing of the required report for that period is waived. However, the political committee is required to notify the filing officer in writing on the prescribed reporting date that no report is being filed on that date.
- 7. The *Political Committee Handbook* references the statutory requirement regarding written notification and directs political committees to notify the Division by way of the Division's EFS. (ROI Exhibit 3, pages 1 & 7). The *Political Committee EFS User's Guide* shows the process through which to notify the Division. The user's guide instructs political committees to select the relevant reporting period and place a checkmark in a box titled "Waiver" to indicate the lack of reportable financial activity. (ROI Exhibit 4)
- 8. Respondent failed to notify the filing officer on the prescribed reporting dates that no reports would be filed for the following reporting periods (ROI Exhibit 5, page 1). The tardiness of the reports is summarized in the table below. (ROI page $1, \P 7$)

Report	Report Cover Period	Date Notification Due	Date Notification Filed	No. of Days Late
2016 G1A	09/03/16 - 09/09/16	09/16/16	09/23/16	7
2016 G3	09/24/16 - 09/30/16	10/07/16	10/11/16	4
2016 D2	10/29/16 - 10/29/16	10/30/16	11/01/16	2
2016 D3	10/30/16 - 10/30/16	10/31/16	11/01/16	1
2016 G7	10/22/16 – 11/03/16	11/04/16	11/08/16	4

- 9. The chairperson for the Respondent stated that he was out of town on several occasions. Respondent's chairperson also stated that he was out of the country during late April to early May and there was no internet available. He stated that he realized the reports had been filed late. (ROI Exhibit 6, page 1)
- 10. "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).

11. The facts set forth above show that Respondent was a political committee registered with the Division. Respondent failed to notify the filing officer on the prescribed reporting dates that no reports would be filed for the following reporting periods: 2016 G1A, 2016 G3, 2016 D2, 2016 D3, and 2016 G7 reporting periods.

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 September 16, 2016, Vets and Families for Truth violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2016 G1A Report.

Count 2:

On or about October 7, 2016, Vets and Families for Truth violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2016 G3 Report.

Count 3:

On or about October 30, 2016, Vets and Families for Truth violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2016 D2 Report.

Count 4:

On or about October 31, 2016, Vets and Families for Truth violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2016 D3 Report.

Count 5:

On or about November 4, 2016, Vets and Families for Truth violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2016 G7 Report.

Respectfully submitted on December 18, 2018.

Wilson Brantley, J.D.

I reviewed this Staff Recommendation this ______ day of December 2018.

Eric M. Lipman

General Counsel

Tim Vaccaro

Executive Director

FLORIDA ELECTIONS COMMISSION

Report of Investigation for Failure to Notify Filing Officer

Case Number: FEC 17-408	Respondent: Vets and Families for Truth
Section 106.07(7), Florida Statutes, failure of a	Complainant: Division of Elections
political committee that did not receive any	Respondent Type:
contributions or make any expenditures during a reporting period to notify timely the filing officer, in	Candidate
writing, that no report is being filed.	Political Committee

I. Preliminary Information:

- 1. An appointment of Campaign Treasurer and Designation of Campaign Depository (DS-DE 6) was filed on July 22, 2016 and July 27, 2016. (Ex. 1)
- 2. An acknowledgement letter was mailed to the address provided on Respondent's DS-DE 6 on July 28, 2016, advising Respondent that all of the Division's publications and reporting forms are available on their website, including Chapter 106, Florida Statutes, the *Political Committee Handbook*, and the Calendar of Reporting Dates. (Ex. 2)
- 3. The acknowledgement letter also states, "An online instruction guide is available to you on the EFS to assist with navigation, data entry, and submission of reports" and provides the telephone number for the Division's EFS Help Desk.
- 4. The *Political Committee Handbook*, discusses filing a notice-of-no-activity when there is no activity to disclose on page 26. (Ex. 3)
- 5. Pages 12, 13, 45, and 46 of the *Political Committee EFS User's Guide* discuss how to notify the Division on the prescribed reporting date that no report will be filed using the EFS. Specifically, page 13 instructs the user to click the box next to "waiver" if there is no activity to disclose. (Ex. 4)
- 6. In a telephone interview on April 2, 2014, Kristi Reid-Bronson clarified that once the waiver box is chosen and a new report is opened as shown on page 12, the only available option on the report summary screen will be "Go To File Report" as shown on page 13. Choosing "Go To File Report" will take the user directly to the screens where the chairman/treasurer PINS are entered as shown on pages 45 and 46.

II. Alleged Violation of Section 106.07(7), Florida Statutes:

7. Respondent's filing history reflects the untimely filed notifications summarized below. (Ex. 5)

Report	Report Cover Period	Date Notification Due	Date Notification Filed	No. of Days Late
2016 G1A	09/03/16 - 09/09/16	09/16/16	09/23/16	7
2016 G3	09/24/16 - 09/30/16	10/07/16	10/11/16	4
2016 D2	10/29/16 – 10/29/16	10/30/16	11/01/16	2 .
2016 D3	10/30/16 - 10/30/16	10/31/16	11/01/16	The state of the s
2016 G7	10/22/16 - 11/03/16	11/04/16	11/08/16	4

- 8. Respondent did not provide a written response to the referral.
- 9. Respondent's chair was interviewed by telephone. He acknowledged that the notices-of-no-activity were filed late. He stated on several occasions he was out of town. He stated that during late April early May he was out of the country. (Ex. 6)

III. FEC History:

10. Respondent does not have any prior cases before the Commission.

Conclusion:

11. Respondent's chair stated during a telephone interview that he did not read the *Political Committee Handbook*. He added that he did not download the Calendar of Reporting Dates. (Ex. 6) He stated that the committee has been disbanded; therefore, it did not matter. (Ex. 7)

SIGNATURE OF INVESTIGATOR:

Margie B. Wade

Date: 1//01/18

FLORIDA ELECTIONS COMMISSION

REPORT OF INVESTIGATION Vets and Families for Truth -- FEC 17-408

LIST OF EXHIBITS				
Exhibits #s	Description of Exhibits			
Exhibit 1	DS-DE 6 Forms			
Exhibit 2	Acknowledgement Letter			
Exhibit 3	Relevant Pages from the Handbook			
Exhibit 4	Relevant Pages from the EFS User's Guide			
Exhibit 5	Filing History			
Éxhibit 6	Phone Log			
Exhibit 7	Disbandment Letter			

STATEMENT OF ORGANIZATION OF POLITICAL COMMITTEE

(PLEASE TYPE)

OFFICE USE ONLY

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16 JUL 22 AM 11:50

	·	DIVISION OF	FLECTIONS
1. Full Name of Committee Vets and Families for Tru	h		SEEreflephone 904-278-0924
•	•	ž ,	
Mailing Address (include cit 950 Blanding Blvd., #19, (3	
Street Address (include city, SAME	state and zip code)		
2. Affiliated or Connected Occommittees)	ganizations (includes other committe	es of continuous e	existence and political
Name of Affiliated or Connected Organization	Mailing Addres	s	Relationship
NONE			,
•		·.	
3. Area, Scope and Jurisdict Political committee supporting	ion of the Committee or opposing statewide, legislative, multice	ounty candidates ar	nd issues
	Organization's Special Interest (e.g., 1 Servative principles i	_	
5. Identify by Name, Address	s and Position, the Custodian of Book	s and Accounts (i	nclude treasurer's name)
Full Name	Mailing Address	Co	mmittee Title or Position
Curtis McClees	950 Blanding Blvd., #19 Orange Park, FL 32065	Chairm	an/Treasurer

6. List by Name, Address Finance Committee, If A	and Position, Other Principal (Any (include chairman's name)	Officers, Including Officers	and Members of the		
Full Name	Mailing Addr	ess Co	ommittee Title or Position		
None			,		
	Office Sought and Party Affiliang (if none, please indicate)	ation Each Candidate or Ot	her Individual that this		
Full Name	Mailing Address	Office Sought	Party		
To be determined					
8. List Any Issues this Co	mmittee is Supporting: To be	determined			
List Any Issues this Co	mmittee is Opposing: To be	determined			
9. If this Committee is Sur N/A	oporting the Entire Ticket of a	Party, Give Name of Party			
	ution, What Disposition will be ta to donors or do		or political org.		
11. List all Banks, Safety I	Deposit Boxes, or Other Depos	sitories Used for Committee	Funds		
Name of Bank or Depo	ository & Account Number	Mailing	g Address		
Ameris Bank		485 Blanding Blvd. Orange Park, FL 32065			
12. List all Reports Requirement and Positions of Such	red to be Filed by this Commit n Officials, If Any	tee with Federal Officials ar	nd the Names, Addresses		
Report Title	Dates Required to be Filed	Name & Position of Official	Mailing Address		
None		·			
STATE OF Florida		Clay	COUNTY		
, Curtis McCle	, certify that the information in this Statement of				
Organization is complete, true and correct. X Signature of Chalman of Political Committee July 21, 2016 Date					
i - '	-				

EXHIBIT 1 page 2 A 4

DS-DE 5 (Rev. 06/11) - Rule 1S-2.017

STATEMENT OF ORGANIZATION OF POLITICAL COMMITTEE

(PLEASE TYPE)

OFFICE USE ONLY

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16 JUL 27 AM 10: 16

DIVISION OF ELECTIONS

1. Full	Name	of Con	nmitted	9
Vets a	and Fa	amilias	for T	rı ıtl

Telephon**ATE** 904-278-0924

Mailing Address (include city, state and zip code) 950 Blanding., #19 Orange Park, FL 32065

Street Address (include city, state and zip code) SAME

2. Affiliated or Connected Organizations (includes other committees of continuous existence and political committees)

	,				
Name of Affiliated or Connected Organization Mailing Address		Relationship			
NONE	1				
·	·				

3, Area, Scope and Jurisdiction of the Committee

Political committee supporting or opposing statewide, legislative, multicounty candidates and issues

4. Nature of Organization or Organization's Special Interest (e.g., medical, legal, education, etc.)

To provide conservative principles in the state of Florida

5. Identify by Name, Address and Position, the Custodian of Books and Accounts (include treasurer's name)

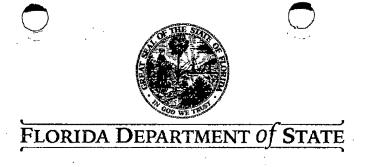
•				
Full Name	Mailing Address	Committee Title or Position		
Curtis McClees	950 Blanding Blvd., #19 Orange Park, FL 32065	Chairman/Treasurer		
	·			
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DS-DE 5 (Rev. 06/11) - Rule 1S-2.017

EXHIBIT 1 page 394

	<u> </u>				
	and Position, Other Principal (Any (include chairman's name)		fficers and N	lembers of the	
Full Name	Mailing Addr	ess	Commit	tee Title or Position	
Curtis McClees	orange Park, FL 32065		Chairman/Treasurer		
	Office Sought and Party Affiliag (if none, please indicate)	ation Each Candida	te or Other In	ndividual that this	
Full Name	Mailing Address	Office	Sought	Party	
To be determined	ı				
8. List Any Issues this Co	mmittee is Supporting: To be	determined			
List Any Issues this Co	mmittee is Opposing: To be	determined			
9. If this Committee is Sur N/A	pporting the Entire Ticket of a	Party, Give Name of	Party		
1	ition, What Disposition will be ta to donors or dol		. .	olitical org.	
11. List all Banks, Safety I	Deposit Boxes, or Other Depos	itories Used for Co	mmittee Fun	ds	
Name of Bank or Depo	ository & Account Number		Mailing Add	ress	
Ameris Bank		485 Blanding Blv Orange Park, FL			
12. List all Reports Require and Positions of Such	red to be Filed by this Commit Officials, If Any	tee with Federal Off	icials and the	e Names, Addresses	
Report Title	Dates Required to be Filed	Name & Position of	Official	Mailing Address	
None					
STATE OF Florida		Clay		COUNTY	
, Curtis McClees , certify that the information in this Statement of					
Organization is complete, fin	ue and correct.	v		,	
X Signature of	X July 26, 2016 Signature of Chairman of Political Committee Date				
DS-DE 5 (Rev. 96/11) - Rule	10.0.01	200 4 4 1 4		page 2	

EXHIBIT 1 page 4 9 4



RICK SCOTT Governor **KEN DETZNER**Secretary of State

July 28, 2016

Curtis McClees, Chairperson Vets and Families for Truth 950 Blanding Boulevard, #19 Orange Park, Florida 32065

Dear Mr. McClees:

This will acknowledge receipt of the Statement of Organization and Appointment of Campaign Treasurer and Designation of Campaign Depository for Vets and Families for Truth, which were placed on file in our office on July 27, 2016. This information appears to comply with the requirements of Section 106.03, Florida Statutes, and the name of this organization has been placed on our active committee list as a political committee.

Campaign Treasurer's Reports

Your first campaign treasurer's report will be due on <u>August 5, 2016</u>. The report will cover the period of July 23-29, 2016 (P4). All political committees that file reports with the Division of Elections are required to file by means of the Division's Electronic Filing System (EFS).

Credentials and Sign-ons

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

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

Identification Number: 69342

Division of Elections R.A. Gray Building, Suite 316 • 500 South Bronough Street • Tallahassee, Florida 32399 850.245.6240 • 850.245.6260 (Fax) dos.myflorida.com/elections/



Curtis McClees, Chairperson July 28, 2016 Page Two

Pin Numbers

Pin numbers are confidential secure credentials that allow you to submit reports and update information. The enclosed sealed envelopes contain your confidential pin numbers.

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

Timely Filing

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

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

Electronic Receipts

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

Curtis McClees, Chairperson July 28, 2016 Page Three

Instructions and Assistance

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

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

Please let me know if you need additional information.

Sincerely,

Kristi Reid Bronson, Chief

int Kuig B

Bureau of Election Records

KRB/zjs

Enclosures

FIORIDAY
ADMINISTRATE
ELECTRONS

Florida Department of State Division of Elections R. A. Gray Building, Room 316 500 South Bronough Street Tallahassee, FL 32399-0250 850.245.6240

(Rev. 01/27/2016)

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Chapter 1: Background

The information contained in this publication is intended as a quick reference guide only and is current upon publication. To the extent that this handbook covers material beyond that contained in law or rule, the Division of Elections (Division) offers such material to candidates as guidelines.

Chapters. 97-106, Florida Statutes, the Constitution of the State of Florida, Division of Elections' opinions and rules, Attorney General opinions, county charters, city charters and ordinances, and other sources should be reviewed in their entirety for complete information regarding campaign financing.

All forms and publications mentioned in the handbook are available on the Division's website at:

http://dos.myflorida.com/elections

Please direct any questions to either your county supervisor of elections or the Division at 850.245.6280. (See also <u>Appendix A – Frequently Asked Questions.</u>) Below you will find some other useful websites:

Florida Elections Commission

http://www.fec.state.fl.us

Florida Elected Officials

http://dos.myflorida.com/elections/contact s/elected-officials/

Florida Supervisors of Elections

http://dos.myflorida.com/elections/contact s/supervisor-of-elections

Florida Association of City Clerks

http://www.floridaclerks.org

Florida Attorney General

http://myfloridalegal.com

Federal Election Commission

.http://www.fec.gov

Chapter 10: Filing Campaign Reports

Each campaign treasurer designated by a political committee shall file regular reports of all contributions received and all expenditures made by or on behalf of such political committee.

The chairperson and campaign treasurer shall certify as to the correctness of each report. Each person so certifying shall bear the responsibility for the accuracy and veracity of each report. Any campaign treasurer or chairperson who willfully certifies the correctness of any report while knowing that such report is incorrect, false or incomplete commits a misdemeanor of the first degree.

(Sections <u>106.011</u> and 106.07, F.S.)

Where to File

A campaign treasurer is required to file campaign treasurer's reports with the officer with whom the committee registers.

Committees filing reports with the Division are required to file by means of the <u>Electronic Filing System</u> (see <u>Chapter 11</u>, <u>Electronic Filing of Campaign Reports</u>). If the committee's filing officer is other than the Division, contact the appropriate filing officer to find out the requirements.

The web address for filing online with the Division is: https://efs.dos.state.fl.us
(Section 106.07(2), F.S.)

When to File

Reports must be filed on the 10th day following the end of each calendar month from the time the committee or organization registers, except that if the 10th day occurs on a Saturday, Sunday or legal holiday, the report shall be filed on the next business day that is not a Saturday, Sunday or legal holiday.

A political committee required to file reports with the Division must file reports:

- On the 60th day immediately preceding the primary election, and each week thereafter, with the last weekly report being filed on the 4th day immediately preceding the general election.
- 2. On the 10th day immediately preceding the general election, and each day thereafter, with the last daily report being filed the 5th day immediately preceding the general election.

For political committees that file with the Division, see the "Reporting Dates Calendar" at:

http://dos.myflorida.com/elections/formspublications/publications/

Any political committee required to file reports with a filing officer other than the division must file reports on the 60th day immediately preceding the primary election and bi-weekly on each Friday thereafter through and including the 4th day immediately preceding the general election, with additional reports due on the 25th and 11th days before the primary election and the general election.

Unless the electronic filing requirements of Section 106.0705, Florida Statutes, apply, reports shall be filed no later than 5 p.m. of the day designated. A report postmarked by the U.S. Postal Service no later than midnight of the day designated is deemed timely filed. A report received by the filing officer within 5 days after the designated due date that was delivered by the U.S. Postal Service is deemed timely filed unless it has a postmark indicating the report was mailed after the designated due date. A certificate of mailing obtained from and dated by the U.S. Postal Service at the time of mailing or a receipt from an established courier company, which bears a date on or before the date on which the report is due, is proof of mailing in a timely manner. Reports filed with the Division through the Electronic Filing System (EFS) are due no later than midnight, Eastern Time, of the due date. (See Chapter 12, Electronic Filing of Campaign Reports.)

> (Sections <u>106.07</u>, <u>106.0705</u> and <u>106.141</u>, F.S.)

Penalty for Late Filing

Any political committee failing to file a report on the designated due date shall be subject to a fine of \$50 per day for the first three 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, for the period covered by the late report. However, for the reports due immediately prior to the primary and general elections, the fine shall be \$500 per day for each late day, not to exceed 25 percent of the total receipts or expenditures, whichever is greater, for the period covered by the late report.

(Section 106.07(8), F.S.)

Notice of No Activity

When there has been no reportable activity in the campaign account during a reporting period (no funds expended or received) the filing of the report is waived. The political committee shall notify the filing officer in writing on or before the prescribed reporting date that no report is being filed on that date. The next report filed must specify that the report covers the entire period between the last submitted report and the report being filed.

(Section 106.07, F.S.)

A notice of no activity filed with the Division must be filed electronically using the Division's electronic filing system.

(Section <u>106.0705</u>, F.S.)

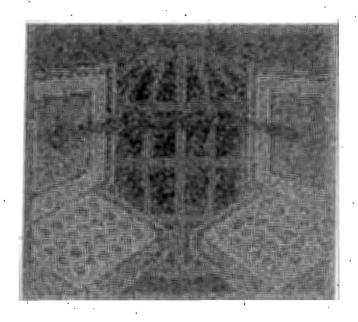
Special Election Reports

When a special election is called to fill a vacancy in office, all political committees making contributions or expenditures to influence the results of the special election shall file campaign treasurers' reports with the filing officer on the dates set by the Department of State pursuant to Section 100.111, F.S.

When an election is called for an issue to appear on the ballot at a time when no candidates are scheduled to appear on the ballot, all political committees making contributions or expenditures in support of or in opposition to such issue shall file reports on the 18th and 4th days prior to such election.

Department of State Division of Elections

Political Committee EFS User's Guide



Florida Department of State Division of Elections R.A. Gray Building, Room 316 500 S Bronough Street Tallahassee, FL 32399-0250

EFS HELP LINE: 850-245-6280

January 2011

Rule 1S-2.017, F.A.C.

DS-DE 110B (eff. 01/11)

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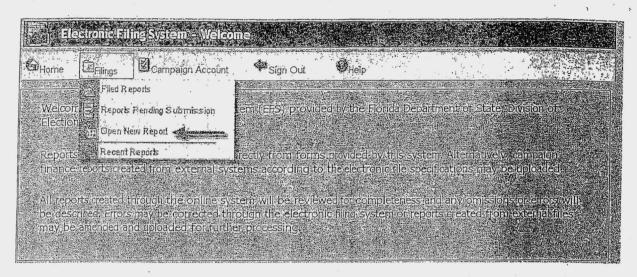
Create a New Report by Data Entry

From the Welcome screen, click



and then





tions at the property of the contraction of the con
Use this form to submit an original report. To submit an amendment to a previously fled report. It staked the report from the Filed Reports Jisting and then choose the Janeira Report obtain from the February literal.
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Coverage Periods Campaign higher seports itemize financial activity occurring during a specific reporting period. The reporting period seports itemize financial activity occurring during a specific reporting period. The reporting period seports is a second of the reporting period of the repor
declared by first selecting the reporting year and then the report type. The beginning and ending coverage dates and there is a filling due date of the report are automatically associated with the reporting rear and report type.
Election Cycle 2010 General Election 5.1 %
ReportType: F2 2010
Coverage Period: 7/17/2010 7/30/2010 Due Date: 08/06/2010 3
Special Electron Report:
Uploading a Campaign Finance Report
A Compaign Finance report file meeting the department's specifications may be uploaded at the time a report is opened.
Use the provise button to locate and select the report text or zip file to be uploaded. You may upload the report file compressed zip. The zip file must contain only one report file.
Browse
Open Report
Open Report

Click arrow next to Election Cycle. Scroll to the cycle associated with the report you are entering.

Click arrow next to Report Type select report type corresponding to the correct cover period and due date.

The Cover Period dates will automatically fill in based on the Calendar of Election and Reporting Dates.

The Due Date will automatically fill in based on the Calendar of Election and Reporting Dates.

If this report is for a special election, click the box next to Special Election Report. (If no special elections are scheduled this option will not be available.)

*****NOTE****

If this report is a waiver of report (no activity), click the box next to Waiver.

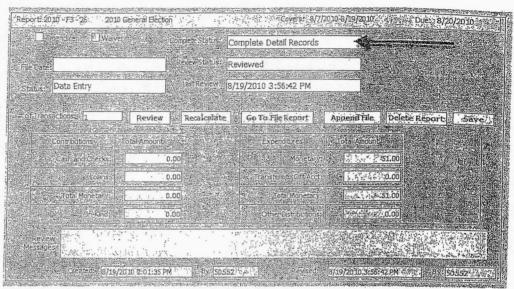
	PORTER AND PROPERTY.	RESERVED FRANKSISSINSIN			
Election Cycles	2010 General Elect	licin	× letter		
Report Type:	FZ 2010				
	CLACION ACTORISTICA SANCTONI				
Coverage Redoid:	7/17/2010	7/30/2010	Due D	ote: 08/06/20:	LD.
	Fibria: Physics		Nation and		

Report: 2010 - G4-27 2010 General Elect	ion	Covers: 10/16/2010-10/26/2	2010 Due: 10/29/2010
☐ Aniendinent ☐ Walver	Complete Status: Incomplete	Detail Records	
	Review Status - Not Review		
File Dates	Jesse Line Renew	eu	
Status: Data Entry	Last Review		
#ofTransactions: 0 Review			
#of Iransactions: [0 Review	of Progression and the Company	CONTRACTION AND SHAPES	Delete Report Save
Contributions Total Amount	EX.	penditurės	nt con
Cash and Checks:	0.00	Monetary:	0.00
Loans	0.00 Trans	fers to Off Accti-	0.00
Total Monetary:	0.00	Total Monetary:	0.00
In-Kind:	0,00 Oth	er Distributions;	0.00
Review			The state of the s
Messages			
Created: 10/26/2010 11:41:2	25 AM By: 50552	Revised: 10/26/2010 1	1:41:25 AM By: 50552
			The second secon

File the Report

If the Review Status is <u>Updated Detail - Needs Review</u> the report has not been reviewed since the last update. (See page 39 for instructions on how to submit the report to the system for review.)

If the status of the report is <u>Complete</u> <u>Detail Records</u>, you are ready to file the report.



Click on Go To File Report

The chairperson enters his or her PIN, and then selects

Report Approved

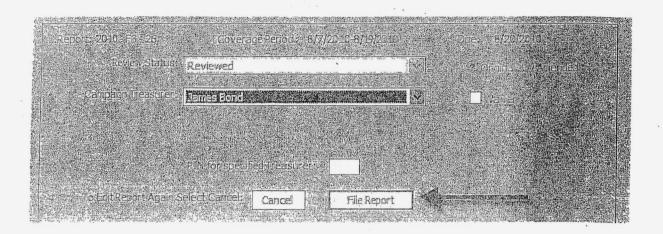
NOTE A PIN is the same as your signatur	e attesting to the v	alidity of the	report.			
Step 1: Enter the candidate/chairperson PIN						n Plan
Step 2: Select the 'Report Approved' buttor	n.					
					Con Section	
Report: 2010 - F3 - 26 Coverage P	eriod: 8/7/2010-8/19;	/2010	Due: 8/20	/2010	775	
					177. K. J. 3	1:1
Review Status: Reviewed		·v/	Öriginal	Amend	ed	
Review Status: Reviewed			∲ Öriginal	Amend	ed	
		\varphi \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	∜ Öriginal ∏ Waivei	Amend	ed	
Review Status: Reviewed PIN for Candidate/Ch	airperson:	Report Ap	Öriginal [] Waiver	Amend	ed	

If there is more than one treasurer, click on the drop down and select the treasurer that is filing the report.

File Report



The treasurer enters his PIN and then clicks



IMPORTANT NOTE: If changes need to be made <u>after</u> a chairperson PIN is entered, the treasurer must <u>undo</u> the chairperson PIN validation before the system will allow changes. See page 49 for instructions.

EXHIBIT 4 page le gle





Florida Department of State - Division of Elections

Florida Election System Reports	s								
Candidate/Committee Lookup	Committ	ee Na	ame: Vets ar	nd Fami	lies for	Truth			
Name:			unt: 69342						
Election:	Data Dua	Tunn	Data Filad	Ctatus	Days	Fine .	^ll	Amount	Amount
▽	Date Due	туре	Date Filed	Status	Late	Assessed	Appealed	Fined	Paid
	9/7/2018		8/31/2018						
Acct: 69342	8/31/2018	P7A	8/27/2018		,				
Type: Committee ✓	8/24/2018	P7	8/24/2018						
r	8/17/2018	P6	8/17/2018						
Search Reset	8/10/2018		8/4/2018						
	·8/3/2018		7/30/2018						
	7/27/2018		7/27/2018						
	7/20/2018		7/20/2018					ŧ	
	7/13/2018		7/10/2018						
	7/6/2018		7/2/2018						
	6/29/2018	P1	6/25/2018						
	6/11/2018	M5							
	5/10/2018		5/8/2018						
	4/10/2018		4/9/2018						
	3/12/2018		3/9/2018						
	2/12/2018		2/8/2018						
	1/10/2018		1/9/2018						
	12/11/2017						•		
	11/13/2017 10/10/2017								
	9/22/2017		9/2/2017						
·	8/10/2017		8/1/2017						
	7/10/2017		7/5/2017						
	6/12/2017		6/1/2017						
	5/10/2017		5/8/2017						
	4/10/2017		4/8/2017						
	3/10/2017		3/17/2017	CLO	7	\$0.00		\$0.00	\$0.00
	2/10/2017		2/11/2017	CLO	1	\$0.00		\$0.00	\$0.00
	1/10/2017		1/9/2017	020	•	Ψ0.00		Ψ0.00	Ψ0.00
	12/12/2016								
	11/4/2016		11/8/2016	FEC	4	\$0.00		\$0.00	\$0.00
	11/4/2016		11/3/2016		,	*****		43.33	40.00
	11/2/2016		11/1/2016						
	11/1/2016		11/1/2016						
	10/31/2016	D3	11/1/2016	FEC	1 `	\$0.00		\$0.00	\$0.00
	10/30/2016		11/1/2016	FEC	2 '	\$0.00		\$0.00	\$0.00
	10/29/2016		10/28/2016						
	10/28/2016		10/27/2016						
	10/21/2016		10/21/2016	•					
*	10/14/2016		10/11/2016		.1				
	10/7/2016		10/11/2016	FEC	4	\$0.00		\$0.00	\$0.00
	9/30/2016	G2A	9/30/2016						
	9/23/2016	G2	9/23/2016						
	9/16/2016	G1A	9/23/2016	FEC	7 ¹	\$0.00		\$0.00	\$0.00

9/9/2016

G1 9/9/2016

9/2/2016 P7A 9/2/2016 8/26/2016 P7 8/26/2016 8/19/2016 P6 8/19/2016 8/12/2016 P5 8/11/2016 8/5/2016 P4 8/1/2016

FLORIDA ELECTIONS COMMISSION PHONE LOG

Case No.: FEC 17-408

Respondent: Vets and Families for Truth

Complainant: Division of Elections

1. **Date and time:** 08/27/18 **Name:** Respondent called **Phone #:** 904-278-0924

Summary: Respondent returned my phone call. He expressed interest in disbanding the committee and I provided the phone number to the Division of Elections. He is not

interested in accepting the MVCO.

Memo to File? No

Entered by: SC

2. **Date and time:** September 14, 2018 @ 9:46 a.m.

Name: Respondent **Phone** #: 904-278-0924

Summary: I called Respondent to introduce myself as the investigator assigned to the case and to query about the repeated late filings. I spoke with Mandy. She stated that Respondent was not available. I left a message with Mandy.

Memo to File? No Entered by: MBW

3. Date and time: September 18, 2018 @ 11:02 a.m.

Name: Respondent **Phone** #: 904-278-0924

Summary: I called Respondent to introduce myself as the investigator assigned to the case and to query about the repeated late filings. I spoke with Mandy. She stated that Respondent was not available. I left a message with Mandy.

Memo to File? No Entered by: MBW

4. **Date and time:** October 30, 2018 @ 3:12 p.m.

Name: Respondent **Phone** #: 904-278-0924

Summary: I called regarding the allegations in the referral. He stated that he realized that he filed the reports late. He stated on several occasions he was out of town. He stated that during late April — early May he was out of the country and there was no internet available. He stated that he did not feel that it's fair to charge him a fine when there was no activity in the committee. He stated that he was disbanded the committee because there was no activity. He stated that he will have to file again if he wants to do anything in 2020. I asked him if he downloaded a copy of the Calendar of Reporting Dates or read the Handbook. He stated he did not; he added that it didn't matter because the committee has been disbanded.

Memo to File? No

Entered by: MBW

5. Date and time:

Name:

Phone #:

Summary:

Memo to File? No

Entered by:

6. Date and time:

Name:

Phone #:

Summary:

Memo to File? No

Entered by:

7. Date and time:

Name:

Phone #:

Summary:

Memo to File? No

Entered by:

8. Date and time:

Name:

Phone #:

Summary:

Memo to File? No

Entered by:

9. Date and time:

Name:

Phone #:

Summary:

Memo to File? No

Entered by:

10. Date and time:

Name:

Phone #:

Summary:

Memo to File? No

Entered by:

11. Date and time:

Name:

Phone #:

EXHIBIT 6 page 2 13

Summary: Memo to File? No Entered by:

Curtis McClees

From:

Curtis McClees <concepts@bellsouth.net>

Sent: To:

Monday, August 27, 2018 1:11 PM elecrecords@dos.myflorida.com

Cc:

concepts@bellsouth.net

Subject:

RE: Vets and Families for Truth PAC 69342 Notice to Disband'

August 27, 2018

To: Division of Elections

This email will serve as a final notice that the committee "Vets and Families for Truth" is disbanding and will no longer be in existence. All remaining funds have been distributed and a final report will be sent effective with filling requirements.

Chairman Vets and Families for Truth

Carris McClees

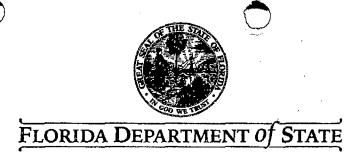
Winning Concepts USA, Inc.

(904) 272-9784

www.winningconceptsusa.com

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2018 AUG 27 PM 3: 50



RICK SCOTT
Governor

KEN DETZNER
Secretary of State

August 29, 2018

Curtis McClees, Chairperson Vets and Families for Truth (69342) 950 Blanding Boulevard, #19 Orange Park, Florida 32065

Dear Mr. McClees:

This will acknowledge receipt of your committee's letter informing us of the disbandment of Vets and Families for Truth as a political committee. This information has been placed on file in our office. Your final report (2018 G1) may be filed at any time but is due no later than September 7, 2018. This report must be filed via the Division's Electronic Filing system. If you have no activity to report, you are still required to file a waiver. Should you need to file amendments after the final report has been filed, please contact our office to have your account activated.

If you have any questions, or if we may be of further assistance to you at any time, please do not hesitate to call (850) 245-6280.

Sincerely,

Kristi Reid Willis, Chief

Bureau of Election Records

KRW/ms

Division of Elections

R.A. Gray Building, Suite 316 • 500 South Bronough Street • Tallahassee, Florida 32399

850.245.6240 • 850.245.6260 (Fax) dos.myflorida.com/elections/

FLORIDA EDITIONS OF STREET

EXHIBIT 7 page 292

Ruid Willis



FLORIDA ELECTIONS COMMISSION

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

www.fec.state.fl.us; fec@myfloridalegal.com

August 9, 2018

Curtis McClees, Chair Vets and Families for Truth 950 Blanding Blvd., #19 Orange Park, FL 32065-2065

RE: Case No.: FEC 17-408: Respondent: Vets and Families for Truth

Dear Mr. McClees:

On November 9, 2017, the Florida Elections Commission received a legally sufficient complaint alleging that your committee violated Section 106.07(7), Florida Statutes, by <u>failing to timely file</u> waiver(s) of the following campaign treasurer's report(s): 2016 G1A, 2016 G3, 2016 D2, 2016 D3, and 2016 G7.

You have the option to <u>resolve your case now by</u> signing a minor violation consent order and <u>paying a fine of \$250</u>, which is \$50 per reporting period, per Rule 2B-1.003, Florida Administrative Code. <u>Should you not accept this offer, the potential fine for the alleged violation(s) is \$5,000</u>, which is \$1,000 per reporting period, as provided for in Section 106.265, Florida Statutes. If you sign the consent order, you would not be required to admit or deny the allegation(s) in the complaint. The signed consent order would then be considered by the Commission at its next available meeting, and would constitute final action by the Commission once it is accepted and approved by the Commission. Please contact Stephanie Cunningham at 850-922-4539, extension 107, or at the address listed above, to accept this minor violation consent order offer.

If you choose not to resolve the case by minor violation consent order, an investigation will be conducted, and then the Commission will hold one or more hearings to determine whether the alleged violation(s) occurred and, if so, the amount of the fine to be imposed upon you. For more information, please see our FAOs available at http://www.fec.state.fl.us.

Sincerely,

Amy McKeever Toman

Executive Director

AMT/enr

DIVISION OF ELECTIONS FEC NOTICE FORM

RECEIVED

To FEC from Division of Elections

7017 HOV -9 P 4: 18

STATE OF FLORIDA

Name:

Vets and Families for Truth

Account Number:

69342

Chairperson:

Curtis McClees

Treasurer:

Curtis McClees

Registered Agent

Curtis McClees

The Division of Elections hereby provides this notice to the Florida Elections Commission pursuant to Sections 106.07(8)(d), 106.22(7), and 106.25(2), Florida Statutes. An apparent violation of Chapter 106, Florida Statutes, has occurred based upon repeated late filings or failure to file notifications to the filing officer in writing that no report was being filed on the prescribed reporting date under s. 106.07(7).

2016 G1A

2016 G3

2016 D2

2016 D3

2016 G7

Sent By:

Kristi Reid Willis

Date:

November 7, 2017

stb

AFFIDAVIT

STATE OF FLORIDA

County of Leon

Kristi Reid Willis, being duly sworn, says:

- 1. I am the Chief of the Bureau of Election Records of the Division of Elections (Division). In that capacity, I oversee the Division's duties related to the filing of campaign finance reports. This affidavit is made upon my personal knowledge, including information obtained from review of the attached records, of which I am the custodian.
- 2. I am of legal age and competent to testify to the matters stated herein.
- 3. Vets and Families for Truth (69342) is a Political Committee registered with the Division. On July 27, 2016, a DSDE 5 and DSDE 6 was filed with the Division of Elections indicating that Curtis McClees was the chairperson and the treasurer for the committee.
- 4. The 2016 G1A campaign treasurer's report was due on September 16, 2016. Mr. McClees failed to notify the Division that no report was being filed on the prescribed reporting date. Mr. McClees filed a notification of no activity on September 23, 2016. (See attached letter and file receipt.)
- 5. The 2016 G3 campaign treasurer's report was due on October 7, 2016. Mr. McClees failed to notify the Division that no report was being filed on the prescribed reporting date. Mr. McClees filed a notification of no activity on October 11, 2016. (See attached letter and file receipt.)
- 6. The 2016 D2 campaign treasurer's report was due on October 30, 2016. Mr. McClees failed to notify the Division that no report was being filed on the prescribed reporting date. Mr. McClees filed a notification of no activity on November 1, 2016. (See attached letter and file receipt.)
- 7. The 2016 D3 campaign treasurer's report was due on October 31, 2016. Mr. McClees failed to notify the Division that no report was being filed on the prescribed reporting date. Mr. McClees filed a notification of no activity on November 1, 2016. (See attached letter and file receipt.)

8. The 2016 G7 campaign treasurer's report was due on November 4, 2016. Mr. McClees failed to notify the Division that no report was being filed on the prescribed reporting date. Mr. McClees filed a notification of no activity on November 8, 2016. (See attached letter and file receipt.)

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

Signature of Affiant

Sworn to (or affirmed) and subscribed before me this 7th day of November, 2017.

Signature of Notary Public - State of Florida

Print, Type, or Stamp Commissioned Name of Notary Public

Personally Known ν





ID: **69342**

Name: Vets and Families for Truth

Report: 2016 - G1A - 7

Election: 2016 General Election

Covers: 9/3/2016-9/9/2016

Due: 9/16/2016

Print Date: 11/3/2017 3:40:40 PM

Filed: 9/23/2016 7:03:40 PM

File Status: Filed Report

Reviewed: 9/23/2016

Review Status: Reviewed

Detail Complete: No Detail Records Found

File Method: Web Filed

Pending Queued Items: 0

Entry Method: Web Data Entry

Number of Detail Records

Contributions:

Expenditures:

Fund Transfers:

Distributions: 0

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

11/3/2017



Ken Detzner Secretary of State

DIVISION OF ELECTIONS

September 26, 2016

Curtis McClees, Treasurer Vets and Families for Truth 950 Blanding Boulevard, #19 Orange Park, FL 32065-2065

PAC 69342

Dear Mr. McClees:

The notification that you had no reportable activity for the report deadline of September 16, 2016, was not filed until September 23, 2016. Although the notification is late, no automatic fine is assessed because you had no receipts or expenditures during this reporting period.

However, to avoid potential issues in the future, please note that state law (s. 106.07(7), Fla. Stat.) requires you to file by the dates set out also in law, either a campaign finance report or if applicable, a notification that no reportable activity occurred for the reporting period. Failure to do may constitute a violation of sections 106.07(1) and 106.19(1)(c), Fla. Stat. The Division is required to notify the Florida Elections Commission of any apparent violation of chapter 106, Fla. Stat., or any failure to file a report or information required by chapter 106, Fla. Stat. If a matter is referred to the Florida Elections Commission, the Commission may assess a civil penalty of up to \$1,000 per violation.

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

Sincerely,





ID: **69342**

Name: Vets and Families for Truth

Report: 2016 - G3 - 10

Election: 2016 General Election

Covers: 9/24/2016-9/30/2016

Due: 10/7/2016

Print Date: 11/3/2017 3:41:12 PM

☑ Amended ☑ Waiver

Filed: 10/11/2016 3:59:25 PM

File Status: Filed Report

Reviewed: 10/11/2016

Review Status: Reviewed

Detail Complete: No Detail Records Found

File Method: Web Filed

Entry Method: Web Data Entry

Pending Queued Items: 0

Number of Detail Records

Contributions:

Expenditures:

Fund Transfers:

Distributions:



FLORIDA DEPARTMENT OF STATE Ken Detzner

Secretary of State

DIVISION OF ELECTIONS

October 17, 2016

Curtis McClees, Treasurer Vets and Families for Truth 950 Blanding Boulevard, #19 Orange Park, FL 32065-2065

PAC 69342

Dear Mr. McClees:

The notification that you had no reportable activity for the report deadline of October 7, 2016, was not filed until October 11, 2016. Although the notification is late, no automatic fine is assessed because you had no receipts or expenditures during this reporting period.

However, to avoid potential issues in the future, please note that state law (s. 106.07(7), Fla. Stat.) requires you to file by the dates set out also in law, either a campaign finance report or if applicable, a notification that no reportable activity occurred for the reporting period. Failure to do may constitute a violation of sections 106.07(1) and 106.19(1)(c), Fla. Stat. The Division is required to notify the Florida Elections Commission of any apparent violation of chapter 106, Fla. Stat., or any failure to file a report or information required by chapter 106, Fla. Stat. If a matter is referred to the Florida Elections Commission, the Commission may assess a civil penalty of up to \$1,000 per violation.

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

Sincerely,



Name: Vets and Families for Truth ID: 69342

Report: 2016 - D2 - 15

Election: 2016 General Election

Covers: 10/29/2016-10/29/2016

Due: 10/30/2016

Print Date: 11/3/2017 3:41:30 PM

Amended Wwaiver

Filed: 11/1/2016 9:03:49 PM

File Status: Filed Report

Reviewed: 11/1/2016

File Method: Web Filed

Entry Method: Web Data Entry

Review Status: Reviewed

Detail Complete: No Detail Records Found

Number of Detail Records

Contributions:

Expenditures:

Fund Transfers:

Distributions:

Pending Queued Items: 0



Ken Detzner Secretary of State

DIVISION OF ELECTIONS

November 4, 2016

Curtis McClees, Treasurer Vets and Families for Truth 950 Blanding Boulevard, #19 Orange Park, FL 32065-2065

PAC 69342

Dear Mr. McClees:

The notification that you had no reportable activity for the report deadline of October 30, 2016, was not filed until November 1, 2016. Although the notification is late, no automatic fine is assessed because you had no receipts or expenditures during this reporting period.

However, to avoid potential issues in the future, please note that state law (s. 106.07(7), Fla. Stat.) requires you to file by the dates set out also in law, either a campaign finance report or if applicable, a notification that no reportable activity occurred for the reporting period. Failure to do may constitute a violation of sections 106.07(1) and 106.19(1)(c), Fla. Stat. The Division is required to notify the Florida Elections Commission of any apparent violation of chapter 106, Fla. Stat., or any failure to file a report or information required by chapter 106, Fla. Stat. If a matter is referred to the Florida Elections Commission, the Commission may assess a civil penalty of up to \$1,000 per violation.

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

Sincerely,



ID: **69342**

Name: Vets and Families for Truth

Report: 2016 - D3 - 16

Due: 10/31/2016

Print Date: 11/3/2017 3:41:50 PM

Election: 2016 General Election

Covers: 10/30/2016-10/30/2016

Filed: **11/1/2016 9:04:54 PM**

File Status: Filed Report

Reviewed: 11/1/2016

Review Status: Reviewed

Detail Complete: No Detail Records Found

File Method: Web Filed

Entry Method: Web Data Entry

Number of Detail Records

Contributions:

Expenditures: 0

Fund Transfers:

Distributions: 0

Pending Queued Items: 0



Ken Detzner Secretary of State

DIVISION OF ELECTIONS

November 15, 2016

Curtis McClees, Treasurer Vets and Families for Truth 950 Blanding Boulevard, #19 Orange Park, FL 32065-2065

PAC 69342

Dear Mr. McClees:

The notification that you had no reportable activity for the report deadline of October 31, 2016, was not filed until November 1, 2016. Although the notification is late, no automatic fine is assessed because you had no receipts or expenditures during this reporting period.

However, to avoid potential issues in the future, please note that state law (s. 106.07(7), Fla. Stat.) requires you to file by the dates set out also in law, either a campaign finance report or if applicable, a notification that no reportable activity occurred for the reporting period. Failure to do may constitute a violation of sections 106.07(1) and 106.19(1)(c), Fla. Stat. The Division is required to notify the Florida Elections Commission of any apparent violation of chapter 106, Fla. Stat., or any failure to file a report or information required by chapter 106, Fla. Stat. If a matter is referred to the Florida Elections Commission, the Commission may assess a civil penalty of up to \$1,000 per violation.

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

Sincerely,





ID: **69342** Name: Vets and Families for Truth

Report: 2016 - G7 - 19

Election: 2016 General Election

Covers: 10/22/2016-11/3/2016

Due: 11/4/2016

Print Date: 11/3/2017 3:42:08 PM

☐ Amended
☑ Waiver

Filed: 11/8/2016 4:39:35 PM

File Status: Filed Report

Reviewed: 11/1/2016

Review Status: Reviewed

Detail Complete: No Detail Records Found

File Method: Web Filed

Pending Queued Items: 0

Entry Method: Web Data Entry

Number of Detail Records

Contributions:

Expenditures:

Fund Transfers:

Distributions:



Ken Detzner Secretary of State

DIVISION OF ELECTIONS

December 8, 2016

Curtis McClees, Treasurer Vets and Families for Truth 950 Blanding Boulevard, #19 Orange Park, FL 32065-2065

PAC 69342

Dear Mr. McClees:

The notification that you had no reportable activity for the report deadline of November 4, 2016, was not filed until November 8, 2016. Although the notification is late, no automatic fine is assessed because you had no receipts or expenditures during this reporting period.

However, to avoid potential issues in the future, please note that state law (s. 106.07(7), Fla. Stat.) requires you to file by the dates set out also in law, either a campaign finance report or if applicable, a notification that no reportable activity occurred for the reporting period. Failure to do may constitute a violation of sections 106.07(1) and 106.19(1)(c), Fla. Stat. The Division is required to notify the Florida Elections Commission of any apparent violation of chapter 106, Fla. Stat., or any failure to file a report or information required by chapter 106, Fla. Stat. If a matter is referred to the Florida Elections Commission, the Commission may assess a civil penalty of up to \$1,000 per violation.

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

Sincerely,