

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Commercial Real Estate Tax

Case No.: FEC 20-156

TO: Commercial Real Estate Tax
Erik Anderson, Chair
1401 52nd Avenue, NE
St. Petersburg, FL 33703-3222

Division of Elections
500 S. Bronough Street, Room 316
Tallahassee, FL 32399-0250

AMENDED NOTICE OF VIRTUAL HEARING (INFORMAL HEARING)
(ONLY CHANGES MADE WERE TO CORRECT WEBINAR ID &
TELECONFERENCE DIAL-IN NUMBER & ACCESS CODE

A hearing will be held in this case before the Florida Elections Commission on, **August 31, 2021, at 8:30 am EST**, or as soon thereafter as the parties can be heard.

Please note that because of COVID-19, this will be a virtual meeting conducted by remote video or teleconference. Enclosed you will find additional details on joining the video conference via GoToWebinar, **9-Digit Webinar ID: 116499747** or via **teleconference by dialing (877) 309-2074** and entering the **meeting access code 339-753-920**, when prompted. **If you wish to speak before the Commission, you will need to appear by webcam and will be sworn in remotely.** Please be advised that the Commission will consider multiple cases, so you will need to wait until your case is considered. If you have any questions, please contact Commission staff at (850) 922-4539.

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 23, 2021

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

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

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

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

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

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

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



Florida Elections Commission

107 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



Commission Meeting August 31, 2021 at 8:30AM via GoToWebinar and OpenVoice

In order to participate in the public portion of the August 31, 2021, Florida Elections Commission meeting, please follow the instructions below:

- A. GoToWebinar – Remote Video Conferencing
 1. Open your web browser and search GoToWebinar or enter www.gotowebinar.com.
 2. Select "Join" in the upper right corner of the website. Select "Webinar".
 3. Enter the 9-digit Webinar ID: 116-499-747 and your email address.
 4. Register your name and email address.
 5. You will automatically join the meeting as an attendee. Attendees are muted and can choose to utilize their webcam.

- B. OpenVoice - Teleconference
 1. Call 1-877-309-2074
 2. Enter Access Code 339-753-920. Attendees do not have an Audio PIN.
 3. You will automatically join the meeting as an **Attendee**. Attendees are muted.

While this is a public meeting and advanced registration is not mandatory, we ask that if you plan to attend via Video Conference or Teleconference, that you notify our office in advance or pre-register at <https://attendee.gotowebinar.com/register/163258102730146317>. This will give the Commission the opportunity to organize the agenda as efficiently as possible. It will be the goal of the Commission to hear cases in which parties are present, first, in order to reduce the standby time of the parties in attendance.

You can call or email our office of your intent to participate or of any questions you may have regarding this meeting. Please provide the case number(s) of interest, when contacting our office.

Thank you,

Commission Staff

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Commercial Real Estate Tax

Case No.: FEC 20-156

TO: Commercial Real Estate Tax
Erik Anderson, Chair
1401 52nd Avenue, NE
St. Petersburg, FL 33703-3222

Division of Elections
500 S. Bronough Street, Room 316
Tallahassee, FL 32399-0250

NOTICE OF VIRTUAL HEARING (INFORMAL HEARING)

A hearing will be held in this case before the Florida Elections Commission on, **August 31, 2021, at 8:30 am EST**, or as soon thereafter as the parties can be heard.

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Tim Vaccaro
Executive Director
Florida Elections Commission
August 13, 2021

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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 32399-6596

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Commission Meeting August 31, 2021 at 8:30AM via GoToWebinar and OpenVoice

In order to participate in the public portion of the August 31, 2021, Florida Elections Commission meeting, please follow the instructions below:

- A. GoToWebinar – Remote Video Conferencing
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 2. Select "Join" in the upper right corner of the website. Select "Webinar".
 3. Enter the 9-digit Webinar ID: 411242395 and your email address.
 4. Register your name and email address.
 5. You will automatically join the meeting as an attendee. Attendees are muted and can choose to utilize their webcam.

- B. OpenVoice - Teleconference
 1. Call 1-877-568-4108
 2. Enter Access Code 684-343-135. Attendees do not have an Audio PIN.
 3. You will automatically join the meeting as an **Attendee**. Attendees are muted.

While this is a public meeting and advanced registration is not mandatory, we ask that if you plan to attend via Video Conference or Teleconference, that you notify our office in advance or pre-register at <https://attendee.gotowebinar.com/register/4603971162014797840>. This will give the Commission the opportunity to organize the agenda as efficiently as possible. It will be the goal of the Commission to hear cases in which parties are present, first, in order to reduce the standby time of the parties in attendance.

You can call or email our office of your intent to participate or of any questions you may have regarding this meeting. Please provide the case number(s) of interest, when contacting our office.

Thank you,

Commission Staff

STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION

Florida Elections Commission,
Petitioner,

Case No.: FEC 20-156

v.

Commercial Real Estate PAC,
Respondent.

_____ /

ORDER OF PROBABLE CAUSE

THIS MATTER was heard by the Florida Elections Commission (Commission) at its regularly scheduled meeting on May 25, 2021, in Tallahassee, Florida.

On March 25, 2021, 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:

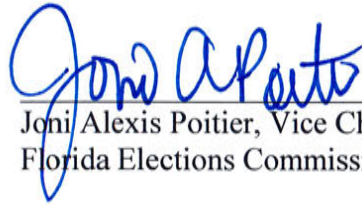
On or about April 10, 2020, Commercial Real Estate PAC violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2020 M3 Report.

Count 2:

On or about May 11, 2020, Commercial Real Estate PAC violated Section 106.19(1)(c), Florida Statutes, when it deliberately failed to

include information required by Chapter 106, Florida Statutes, on the committee's 2020 M4 Report.

DONE AND ORDERED by the Florida Elections Commission on May 25, 2021.



Joni Alexis Poitier, Vice Chair
Florida Elections Commission

Copies furnished to:
Stephanie J. Cunningham, General Counsel
Commercial Real Estate PAC, Respondent
Division of Elections, Complainant

NOTICE OF RIGHT TO A HEARING

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

Second, you may request an informal hearing held before the Commission, if you do not dispute any material fact in the Staff Recommendation. You have 30 days from the date the Order of Probable Cause is filed with the Commission to request such a hearing. The date this order was filed appears in the upper right-hand corner of the first page of the order. At the hearing, you will have the right to make written or oral arguments to the Commission concerning the legal issues related to the violation(s) and the potential fine. At the request of Respondent, the Commission will consider and determine willfulness at an informal hearing. Otherwise, live witness testimony is unnecessary.

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

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

appears in the upper right-hand corner of the first page of the order.

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

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Commercial Real Estate PAC

Case No.: FEC 20-156

TO: Commercial Real Estate PAC
Erik Anderson, Chair
1401 52nd Avenue NE
St. Petersburg, FL 33703-3222

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

NOTICE OF VIRTUAL HEARING (PROBABLE CAUSE DETERMINATION)

A hearing will be held in this case before the Florida Elections Commission on **May 25, 2021**. The Commission's Confidential Session will begin **at 1:00 p.m., EST**, and will consider multiple cases that day.

Please note that because of COVID-19, this will be a virtual meeting conducted by remote video or teleconference. Enclosed you will find additional details on joining the video conference via **ZOOM, Meeting ID 94154440062**, or via teleconference by dialing **(929) 205-6099** and entering the meeting **access code 459476**, when prompted. **If you wish to speak before the Commission, you will need to appear by webcam and will be sworn in remotely.** Please be advised that the Commission will consider multiple cases, so you will need to wait until your case is considered. If you have any questions, please contact Commission staff at (850) 922-4539. **The confidential session will begin following the conclusion of the public session and lunch break. Please login promptly and be prepared to wait until the confidential session begins.**

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Tim Vaccaro
Executive Director
Florida Elections Commission
May 10, 2021

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Florida Elections Commission

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Confidential Commission Meeting May 25, 2021 at 1:00 PM via Zoom

In order to participate in the confidential portion of the May 25, 2021, Florida Elections Commission meeting, please follow the instructions below:

Join Zoom Meeting

Click on the meeting link sent to your attention via email:

<https://zoom.us/j/94154440062?pwd=NE9oNEZBN3FaZklDRHZmZUIKTituUT09>

If you have difficulty launching the hyperlink, follow these steps.

1. Open your web browser and search Zoom or enter www.zoom.us
2. Select "Join A Meeting" in the upper right corner of the website.
3. Enter the Meeting ID: 941 5444 0062 and click "Join".
4. Enter the Participant Passcode: 459476 and click "Join".

For alternative audio participation:

1. Dial: 1 (929) 205-6099
2. Meeting ID: 941 5444 0062
3. Participant Passcode: 459476

While this is a confidential meeting and advanced registration is not mandatory, we ask that if you plan to attend via Video Conference or Teleconference, that you notify our office in advance. This will give the Commission the opportunity to organize the agenda as efficiently as possible. It will be the goal of the Commission to hear cases in which parties are present, first, in order to reduce the standby time of the parties in attendance.

Please test your audio; microphone, speakers and webcam, in advance.

Those attendees who wish to speak before the Commission will need to appear by webcam and will be sworn in remotely.

Please be advised that the Commission will consider multiple cases, so you will be placed in a Zoom Breakout Room until your case is considered.

If you have any questions, contact Commission staff at (850) 922-4539. Please provide the case number(s) of interest, when contacting our office.

Thank you,

Commission Staff

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Commercial Real Estate PAC

Case No.: FEC 20-156

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 **Sections 106.07(7), and 106.19(1)(c), Florida Statutes**. Based upon a thorough review of the Report of Investigation submitted on February 17, 2021, the following facts and law support this staff recommendation:

1. On June 29, 2020, the Florida Elections Commission (“Commission”) received a referral from the Department of State, Division of Elections (“Division” of “Complainant”), alleging that Commercial Real Estate PAC (“Respondent”) violated Chapter 106, Florida Statutes.

2. Respondent is a political committee registered with the Division. (ROI Exhibit 2, pages 1 & 2)¹ On January 27, 2021, the Division sent Respondent an initial notice of intent to cancel registration due to the committee’s limited financial activity occurring during the 2019 and 2020 calendar years.² (ROI Exhibit 12)

3. By letter dated July 27, 2020, 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 registered with the Division of Elections, 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 following periods:

- 2020 M3
- 2020 M4

Section 106.19(1)(c), Florida Statutes: As alleged in the complaint, Respondent, a political committee registered with the Division of Elections, may have falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, during the following periods:

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

² As of the date of this Staff Recommendation, Respondent is still an active political committee with the option of requesting a hearing before the Florida Elections Commission in order to object to the cancellation of its registration.

- 2020 M3
- 2020 M4

4. By letter dated August 8, 2013, Kristi Reid Bronson, Chief, Bureau of Election Records, sent Respondent a letter acknowledging that the Division had received its Statement of Organization and Appointment of Campaign Treasurer and Designation of Campaign Depository for Political Committees forms. (ROI Exhibit 3, page 1)

5. The acknowledgment letter advised Respondent that all political committees 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 grant access to the EFS. (ROI Exhibit 3, 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 *2013 Calendar of Reporting Dates* as well as other relevant documents. (ROI Exhibit 3, page 3)

6. Complainant alleged that Respondent violated Florida’s election laws by failing to notify the filing officer on the prescribed reporting dates that no reports would be filed or by falsely reporting or deliberately failing to include information required by Chapter 106, Florida Statutes, during the following reporting periods: 2020 M3 and 2020 M4.

7. Respondent’s 2020 M3 and 2020 M4 reports were due to be filed by April 10, 2020, and May 11, 2020, respectively; however, Respondent failed to timely file the reports or notify the filing officer that no reports would be filed. (ROI Exhibit 7, page 1) The Division sent six letters notifying Respondent that its reports had not been received. The letters also notified Respondent that it was still required to notify the Division if the committee had no reportable financial activity. (ROI Exhibit 4-6) The letters sent by certified mail were confirmed delivered. (ROI Exhibit 5, page 2; ROI Exhibit 6, page 2)

8. A subpoena was issued to Respondent’s designated campaign depository to ascertain whether any financial activity occurred during the relevant reporting periods, i.e., March 1, 2020 – March 31, 2020, and April 1, 2020 – April 30, 2020. Respondent’s bank records do not show reportable financial activity during the 2020 M3 reporting period, but show reportable financial activity during the 2020 M4 reporting period. (ROI Exhibit 8)

9. Erik Anderson, chairperson for Respondent, stated that the committee changed officers and that there was a miscommunication between the Division and the committee’s treasurer. (ROI Exhibit 9, page 3) He stated that during the transition in officers, reminder emails regarding reporting due dates were sent to the wrong person. (ROI Exhibit 11, page 2)

10. The Division’s records show that the most recent change in chairperson took place in 2016, and that a change in treasurer took place on July 27, 2020. (ROI Exhibit 10, pages 1 & 6-8) Respondent attempted to effect a change in treasurer on May 19, 2020, and July 8, 2020; however, the committee submitted an incomplete form. (ROI Exhibit 10, pages 3 & 4) The Division’s History Notes show that the Division contacted the committee on multiple occasions to assist with correctly filing the change in treasurer form. (ROI Exhibit 10, page 9) Additionally, as

of the committee's initial attempt to effect a change in treasurer on May 19, 2020, both filings at issue were already late as they were due on April 10, 2020, and May 11, 2020.

11. As it appears that Respondent had no financial activity during the 2020 M3 reporting period, Respondent was required to notify the filing officer in writing that it would not be filing its 2020 M3 Report on the prescribed reporting date, but failed to do so. As it appears that Respondent had financial activity during the 2020 M4 reporting period, Respondent deliberately failed to include information in its 2020 M4 Report in violation of Section 106.19(1)(c), Florida Statutes.

12. On July 31, 2020, Respondent filed a notice of no activity for the 2020 M3 reporting period. The notification was 112 days late. Additionally, Respondent has not disclosed the financial activity attributable to the 2020 M4 reporting period, but rather filed a notice of no activity on July 24, 2020. The notification was filed 74 days after the due date of the report. (ROI Exhibit 7, page 1)

13. "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).

14. The facts set forth above show that Respondent is a political committee registered with the Division. Respondent failed to timely file its 2020 M3 and 2020 M4 reports or notify the filing officer that no reports would be filed. It appears that Respondent had no financial activity during the 2020 M3 reporting period, and therefore, was required to notify the filing officer in writing that it would not be filing the committee's 2020 M3 Report on the prescribed reporting date, but failed to do so. As it appears that Respondent had financial activity during the 2020 M4 reporting period, Respondent deliberately failed to include information in its 2020 M4 Report in violation of Section 106.19(1)(c), Florida Statutes.

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 April 10, 2020, Commercial Real Estate PAC 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 2020 M3 Report.

Count 2:

On or about May 11, 2020, Commercial Real Estate PAC violated Section 106.19(1)(c), Florida Statutes, when it deliberately failed to include information required by Chapter 106, Florida Statutes, on the committee's 2020 M4 Report.

Respectfully submitted on March 25, 2021.



Stephanie J. Cunningham
Assistant General Counsel

I reviewed this Staff Recommendation this 25th day of March 2021.



Tim Vaccaro
Executive Director

FLORIDA ELECTIONS COMMISSION

Report of Investigation for Sections 106.07(7) and 106.19(1)(c), F.S.

Case Number: FEC 20-156

Respondent: Commercial Real Estate PAC

Sections 106.07(7) and 106.19(1)(c), Florida Statutes, failure of a candidate or political committee that did not receive any contributions or make any expenditures during a reporting period to notify timely the filing officer, in writing, that no report is being filed or failure to file a campaign report to reflect financial activity.

Division of Elections (Division)

Referral Filed: June 29, 2020

Respondent Type:

Candidate/Candidate's Treasurer

PC/PC's Chairperson/PC's Treasurer

I. Preliminary Information:

1. Respondent is a political committee registered with the Division.¹

2. An Appointment of Campaign Treasurer and Designation of Campaign Depository (DS-DE 6) was filed on August 7, 2013. Respondent appointed Steven Silverman as campaign treasurer. Respondent filed another DS-DE 6 on September 9, 2016, appointing Steven G. Klein as campaign treasurer.² Respondent filed another DS-DE 6 on July 27, 2020, appointing William M. Roberts as campaign treasurer. To review the DS-DE 6s, refer to Exhibit 1.

3. A Statement of Organization (DS-DE 5) for the political committee was filed with the Division on August 7, 2013. A change of officer letter was filed on August 9, 2016, appointing Erik Anderson as chairperson. To review a copy of the Statement of Organization and change of officer letter, refer to Exhibit 2.

4. An acknowledgement letter was mailed to the address provided on the DS-DE 5 on August 8, 2013, advising Respondent's chairperson that all political committees filing reports with the Division are required to file by means of the Division's electronic filing system (EFS). Respondent's chairperson was provided with a user identification number and initial password allowing him access to the EFS.

5. The acknowledgement letter also advised Respondent's chairperson 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*. The letter further advised Respondent's chairperson that it was his responsibility to read, understand, and follow the requirements of Florida's election laws. Similar acknowledgement letters were sent to Treasurer Steven G. Klein on September 12, 2016, and Chairperson Erik Anderson on August 10, 2016. To review the acknowledgement letters, refer to Exhibit 3.

6. The Division sent correspondence to Respondent's chairperson notifying Respondent that the committee had not filed either a campaign report or notification that no reportable activity occurred for the following reporting periods: 2020 M3 and 2020 M4. The letters included reference to the filing dates for the reports. The correspondence was mailed to Respondent's chairperson at the address provided on the DS-DE 6. To review the failure to file correspondence, refer to Exhibit 4.

¹ The Division sent Respondent an initial notice of intent to cancel its registration due to limited financial activity on January 27, 2021. Refer to Exhibit 12.

² Mr. Klein was the treasurer during the timeframe applicable to the reporting periods at issue.

7. On May 12, 2020, the Division sent Respondent a letter marked “Final Notice” with delivery confirmation stating that the following campaign report, or the required notification that no reportable activity occurred, had not been filed: 2020 M3. The letter was mailed to Respondent’s chairperson at the address provided on the DS-DE 6, and it was confirmed delivered on May 14, 2020. To review the letter marked “Final Notice” and delivery confirmation, refer to Exhibit 5.

8. On June 11, 2020, the Division sent Respondent a letter marked “Final Notice” with delivery confirmation stating that the following campaign report, or the required notification that no reportable activity occurred, had not been filed: 2020 M4. The letter was mailed to Respondent’s chairperson at the address provided on the DS-DE 6, and it was confirmed delivered on June 15, 2020. To review the letter marked “Final Notice” and delivery confirmation, refer to Exhibit 6.

II. Alleged Violation of Sections 106.07(7), and 106.19(1)(c), Florida Statutes:

9. I investigated whether Respondent violated these sections of the election laws either by not notifying the filing officer, in writing, that no report would be filed due to not receiving any contributions or making expenditures during the following reporting periods or by not filing campaign reports to reflect financial activity for the reporting periods. To review a copy of the political committee’s filing history, refer to Exhibit 7.

Report	Report Cover Period	Due Date	³ Report or Waiver Required	⁴ Exhibit #
2020 M3	03/01 – 03/31/20	04/10/20	Waiver	8
2020 M4	04/01 – 04/30/20	05/11/20	Report	8

10. Respondent did not respond to the referral.

11. Respondent’s chairperson did respond to a questionnaire-affidavit. Respondent’s chairperson indicated he does not possess a copy of and has not read Chapter 106, Florida Statutes, the *Political Committee Handbook*, or the *Political Committee EFS User’s Guide*. When asked why Respondent failed to file either a report or waiver for the two reporting periods at issue, he stated that Respondent changed officers, and there was a miscommunication between the State and Respondent’s treasurer. To review Respondent’s response to the questionnaire-affidavit, refer to Exhibit 9.

12. Division records show that Respondent filed many DS-DE 6s since its organization in 2013 and changed treasurers several times. However, the most recent treasurer appointment before the due dates of the reporting periods at issue was in 2016, when Stephen G. Klein was appointed treasurer. Mr. Klein did not resign until July 27, 2020.⁵ The most recent chairperson change was the appointment of Erik Anderson in 2016. Division history notes show no record of conversations about officer changes or related miscommunication issues in 2020 until after the due dates of the reporting periods at issue. To review the Division records, refer to Exhibit 10.

³ Respondent filed waivers for the 2020 M3 and M4 reports on July 31, 2020, and July 24, 2020, respectively. Refer to Exhibit 7.

⁴ I subpoenaed the political committee’s campaign account records from the designated campaign depository.

⁵ Three DS-DE 6s were filed in an attempt to appoint Mr. Roberts as Mr. Klein’s replacement, the first two of which were deemed incomplete by the Division. The first incomplete DS-DE 6 was not filed until May 19, 2020.

13. On January 26, 2021, I called Respondent's chairperson for the purpose of reviewing the referral and his submitted questionnaire-affidavit with him. Respondent's chairperson stated that during the transition of the change of officers, report reminders were going to the wrong person.⁶ He also stated that after William Roberts became the treasurer, all reports were caught up. To review a copy of the phone log, refer to Exhibit 11.



SIGNATURE OF INVESTIGATOR:

Date: February 17, 2021

⁶ All but two failure to file letters for the reports at issue were sent by the Division before Respondent filed the first incomplete DS-DE 6 attempting to appoint Mr. Roberts as the new treasurer, and all of them were sent before a complete DS-DE 6 appointing Mr. Roberts was filed. Further, they were all addressed to Respondent's chairperson, with copies also being mailed to the treasurer. Refer to Exhibits 4, 5, and 6.

FLORIDA ELECTIONS COMMISSION
REPORT OF INVESTIGATION
Commercial Real Estate -- FEC 20-156

LIST OF EXHIBITS	
Exhibits #s	Description of Exhibits
Exhibit 1	DS-DE 6s
Exhibit 2	Statement of Organization
Exhibit 3	Acknowledgement Letter
Exhibit 4	Division Correspondence
Exhibit 5	2020 M3 Final Notice and Delivery Confirmation
Exhibit 6	2020 M4 Final Notice and Delivery Confirmation
Exhibit 7	Filing History
Exhibit 8	Bank Records
Exhibit 9	Q/A
Exhibit 10	History Notes
Exhibit 11	Phone Log
Exhibit 12	Notice of Intent to Revoke

**APPOINTMENT OF CAMPAIGN TREASURER
AND DESIGNATION OF CAMPAIGN
DEPOSITORY FOR
POLITICAL COMMITTEES**
(Sections 106.011(1) and 106.021(1), F.S.)

2013 AUG -7 AM 11:48

STATE OF FLORIDA
TAMPA

OFFICE USE ONLY

CHECK APPROPRIATE BOX:

- Original Appointment of Treasurer Reappointment of Treasurer Deputy Treasurer

1. Committee or Organization Commercial Real Estate PAC		2. Telephone (813) 969-4227	
3. Name of Treasurer or Deputy Treasurer Steven Silverman		4. Email (optional) ()	
5. Telephone (optional) ()			
6. Mailing Address 4518 West Swann Avenue, Tampa, Florida 33609			
7. Street Address 4518 West Swann Avenue, Tampa, Florida 33609			
8. The following bank has been designated as the <input checked="" type="checkbox"/> Primary Depository <input type="checkbox"/> Secondary Depository			
9. Name of Bank Cadence Bank		10. Street Address 11790 North Dale Mabry Hwy	
11. City Tampa		12. State Florida	13. Zip Code 33618
14. Signature of Chairman <i>X William M. Roberts</i>		15. Name of Chairman (Print or Type) William M. Roberts	

Campaign Treasurer's Acceptance of Appointment

I, Steven Silverman, do hereby accept the appointment as
(Please Print or Type)
treasurer or deputy treasurer for Commercial Real Estate PAC
(Committee or Organization)

**UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING CAMPAIGN TREASURER'S
ACCEPTANCE OF APPOINTMENT AND THAT THE FACTS STATED ARE TRUE.**

7/25/13
Date

X *William M. Roberts*
Signature of Campaign Treasurer or Deputy Treasurer


**APPOINTMENT OF CAMPAIGN TREASURER
AND DESIGNATION OF CAMPAIGN
DEPOSITORY FOR
POLITICAL COMMITTEES**
(Sections 106.011(1) and 106.021(1), F.S.)

RECEIVED
16 SEP -9 AM 9:30
DIVISION OF ELECTIONS
SECRETARY OF STATE

CHECK APPROPRIATE BOX:

OFFICE USE ONLY

Original Appointment of Treasurer Reappointment of Treasurer Deputy Treasurer

1. Committee or Organization CRE PAC - 60777		2. Telephone (727) 942-4503	
3. Name of Treasurer or Deputy Treasurer Steven G. Klein		4. Email (optional) stevek@tampabay.com	
5. Telephone (optional)			
6. Mailing Address 5123 Kernwood Ct., Palm Harbor, FL 34685			
7. Street Address 5123 Kernwood Ct., Palm Harbor, FL 34685			
8. The following bank has been designated as the <input checked="" type="checkbox"/> Primary Depository <input type="checkbox"/> Secondary Depository			
9. Name of Bank Wells Fargo Bank		10. Street Address 4949 Ridgemoor Blvd.	
11. City Palm Harbor		12. State FL	13. Zip Code 34685
14. Signature of Chairman X 		15. Name of Chairman (Print or Type) Erik Anderson	

Campaign Treasurer's Acceptance of Appointment

I, Steven G. Klein, do hereby accept the appointment as
(Please Print or Type)
treasurer or deputy treasurer for CRE PAC
(Committee or Organization)

**UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING CAMPAIGN TREASURER'S
ACCEPTANCE OF APPOINTMENT AND THAT THE FACTS STATED ARE TRUE.**

8/18/16
Date

X 
Signature of Campaign Treasurer or Deputy Treasurer

**APPOINTMENT OF CAMPAIGN TREASURER
AND DESIGNATION OF CAMPAIGN
DEPOSITORY FOR
POLITICAL COMMITTEES**
(Sections 106.011(2) and 106.021(1), F.S.)


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DEPARTMENT OF STATE
2020 JUL 27 AM 9:12
DEPARTMENT OF STATE
DIVISION OF ELECTIONS

CHECK APPROPRIATE BOX:

Initial Filing for: Primary Treasurer Deputy Treasurer

Re-filing to Change: Primary Treasurer Deputy Treasurer Primary/Secondary Depository

OFFICE USE ONLY

1. Committee <i>Commercial Real Estate PAC</i>		2. Telephone <i>(927) 939-4227</i>	
3. Name of Treasurer or Deputy Treasurer <i>William M. Roberts</i>		4. Email (optional) <i>Broberts.Tampa@gmail.com</i>	
5. Telephone (optional) <i>(813) 833-4398</i>			
6. Mailing Address <i>14711 Clarendon Dr., Tampa, FL 33624</i>			
7. Street Address			
8. The following bank has been designated as the <input checked="" type="checkbox"/> Primary Depository <input type="checkbox"/> Secondary Depository			
9. Name of Bank <i>Wells Fargo Bank, N.A</i>		10. Street Address <i>4949 Ridgemoor Blvd.</i>	
11. City <i>Palm Harbor</i>		12. State <i>FL</i>	13. Zip Code <i>34685</i>
14. Signature of Chairman <i>X</i> 		15. Name of Chairman (Print or Type) <i>Erik Anderson</i>	

Campaign Treasurer's Acceptance of Appointment

I, *William M. Roberts*, do hereby accept the appointment as
(Please Print or Type)
treasurer or deputy treasurer for *Commercial Real Estate PAC*
(Committee)

**UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING CAMPAIGN TREASURER'S
ACCEPTANCE OF APPOINTMENT AND THAT THE FACTS STATED ARE TRUE.**

6/23/2020 Date *William M. Roberts*
Signature of Campaign Treasurer or Deputy Treasurer

STATEMENT OF ORGANIZATION OF POLITICAL COMMITTEE

(PLEASE TYPE)

OFFICE USE ONLY

AUG - 7 11:18

1. Full Name of Committee Commercial Real Estate PAC	Telephone 813/969-4227
--	-------------------------------

Mailing Address (include city, state and zip code)
 12000 North Dale Mabry Highway, Suite 110, Tampa, Florida 33618

Street Address (include city, state and zip code)
 12000 North Dale Mabry Highway, Suite 110, Tampa, Florida 33618

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

Name of Affiliated or Connected Organization	Mailing Address	Relationship
Florida Gulfcoast Commercial Association of Realtors Florida Gulfcoast Commercial Association of Real Estate Professionals	12000 North Dale Mabry Hwy Suite 110 Tampa, Florida 33618	Affiliated organizations

3. Area, Scope and Jurisdiction of the Committee
 Statewide political committee to support or oppose candidates for statewide, multi-county, legislative, county and municipal office and other activities not prohibited by Chapter 106, F.S.

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

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
Steven Silverman	4518 West Swann Avenue Tampa, Florida 33609	Treasurer
Mary Swayze	12000 North Dale Mabry Hwy Suite 110 Tampa, Florida 33618	Deputy Treasurer

6. List by Name, Address and Position, Other Principal Officers, Including Officers and Members of the Finance Committee, If Any (include chairman's name)

Full Name	Mailing Address	Committee Title or Position
William M. Roberts	1529 South Dale Mabry Hwy, #100 Tampa, Florida 33629	Chairman
Abraham Adler	14499 North Dale Mabry Hwy, #200 Tampa, Florida 33618	Vice Chairman

7. List by Name, Address, Office Sought and Party Affiliation Each Candidate or Other Individual that this Committee is Supporting (if none, please indicate)

Full Name	Mailing Address	Office Sought	Party
To be determined			

8. List Any Issues this Committee is Supporting: To be determined
List Any Issues this Committee is Opposing: To be determined

9. If this Committee is Supporting the Entire Ticket of a Party, Give Name of Party
 N/A

10. In the Event of Dissolution, What Disposition will be Made of Residual Funds?
 Contribute to candidates, political parties, political committees or other activities not prohibited by law.

11. List all Banks, Safety Deposit Boxes, or Other Depositories Used for Committee Funds

Name of Bank or Depository & Account Number	Mailing Address
Cadence Bank	11790 North Dale Mabry Highway Tampa, Florida 33618

12. List all Reports Required to be Filed by this Committee with Federal Officials and the Names, Addresses and Positions of Such Officials, If Any

Report Title	Dates Required to be Filed	Name & Position of Official	Mailing Address
Form 8871 Form 1120POL Form 990 as may be required	Upon formation March 15, annually May 15, annually	Internal Revenue Service	Ogden, UT 84201

STATE OF Florida COUNTY Hillsborough

I, William M. Roberts, certify that the information in this Statement of Organization is complete, true and correct.

X William M. Roberts Signature of Chairman of Political Committee 7/29/10 Date

COATES LAW FIRM, PL

ATTORNEYS AT LAW

STATE OF FLORIDA
DIVISION OF ELECTIONS

RICHARD E. COATES
EMMETT MITCHELL, IV
ROGER N. BEAUBIEN

2013 AUG -7 AM 11:48

115 EAST PARK AVENUE, SUITE 1
TALLAHASSEE, FLORIDA 32301
(850) 681-1029
FAX: (208) 248-9038

NOREEN A. FENNER*
**Not an attorney*

DIVISION OF ELECTIONS
TALLAHASSEE, FL

August 7, 2013

VIA HAND DELIVERY

Ms. Kristi Bronson
Division of Elections
RA Gray Building
Tallahassee, Florida 32399

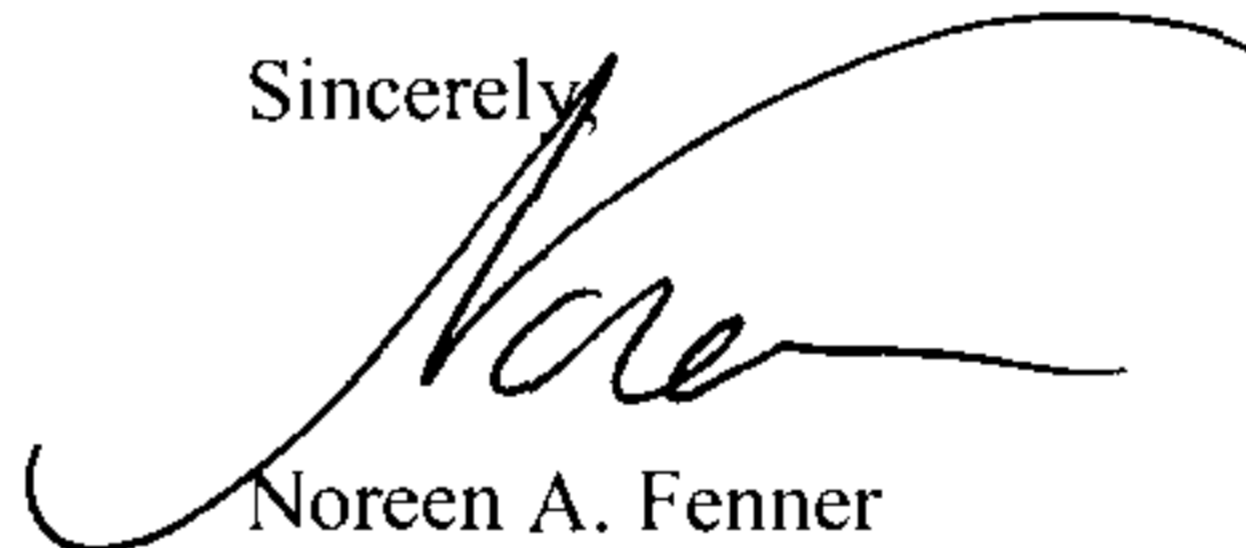
RE: Commercial Real Estate PAC

Dear Kristi:

Enclosed for filing are the Statement of Organization, Appointment of Treasurers and Registered Agent Appointment forms for the above referenced entity.

Please let us know when the Division of Elections certifies the entity or if you need any additional information. Thank you for your assistance.

Sincerely,



Noreen A. Fenner
Legal Assistant

Enclosures

RECEIVED

16 AUG -9 PM 3: 38

DIVISION OF ELECTIONS
SECRETARY OF STATE

July 26, 2016

Division of Elections
Tallahassee, FL

To Whom it May Concern:

Please accept this letter of notification to change our chairperson who is currently listed as Mark Blanton, email: markeblanton@gmail.com to our new chairperson, Erik Anderson, email: erik@cprrtam.com effective August 15, 2016.

Please provide Mr. Anderson with his own reviewer PIN code for our PAC filings with the state.

Thank you for your assistance and immediate attention to this matter.

Sincerely,



David Fern

Deputy Treasurer, Commercial Real Estate PAC

COMMERCIAL REAL ESTATE PAC
KERNWOOD COURT PALM HARBOR FL 34685 727-942-4503



FLORIDA DEPARTMENT *of* STATE

RICK SCOTT
Governor

KEN DETZNER
Secretary of State

August 8, 2013

William M. Roberts, Chairperson
Commercial Real Estate PAC
1529 South Dale Mabry Highway, Suite 100
Tampa, Florida 33629

Dear Mr. Roberts:

This will acknowledge receipt of the Statement of Organization and Appointment of Campaign Treasurer and Designation of Campaign Depository for **Commercial Real Estate PAC**, which were placed on file in our office on August 7, 2013. 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 that supports both candidates and issues.

Campaign Treasurer's Reports

Your first campaign treasurer's report will be due on **July 10, 2013**. The report will cover the period of January 1, 2013 - March 31, 2013. 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 sign-on. 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: 60777

Division of Elections
R.A. Gray Bldg., Rm. 316 • 500 S Bronough St. • Tallahassee, Florida 32399-0250
Telephone: (850) 245-6240 • Facsimile: (850) 245-6259 elections.myflorida.com
Commemorating 500 years of Florida history www.fla500.com



Mr. William M. Roberts, Chairperson
August 8, 2013
Page Two

Pin Numbers

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

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 no later than midnight, Eastern Standard Time, of the due date. Reports not filed by midnight of the due date are late filed and subject to the penalties in Section 106.07(8), Florida Statutes. In the event that the EFS is inoperable on the due date, the report will be accepted as timely filed if filed no later than midnight, 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.

Mr. William M. Roberts, Chairperson
August 8, 2013
Page Three

Instructions and Assistance

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

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

Please let me know if you need additional information.

Sincerely,



KRB
Kristi Reid Bronson, Chief
Bureau of Election Records

KRB/ddb

Enclosures

pc: Mr. Steven Silverman Treasurer
Ms. Mary Swayze, Deputy Treasurer



FLORIDA DEPARTMENT *of* STATE

RICK SCOTT
Governor

KEN DETZNER
Secretary of State

September 12, 2016

Steven G. Klein, Treasurer
Commercial Real Estate PAC (60777)
5123 Kernwood Court
Palm Harbor, Florida 34685

Dear Mr. Klein:

Your appointment as treasurer for **Commercial Real Estate PAC** was filed in this office on September 9, 2016. Enclosed is a security envelope containing your confidential pin number to access the Division's Electronic Filing System (EFS) for submitting campaign treasurer's reports.

All of the Division's publications and 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.

If you have questions concerning your campaign account or the EFS, you may call (850) 245-6280.

Sincerely,

A handwritten signature in black ink, appearing to read "Kristi Reid Bronson".

Kristi Reid Bronson, Chief
Bureau of Election Records

KRB/zjs

Enclosures

pc: Erik Anderson, Chairperson

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 DEPARTMENT *of* STATE

RICK SCOTT
Governor

KEN DETZNER
Secretary of State

August 10, 2016

Erik Anderson, Chairperson
Commercial Real Estate PAC (60777)
5123 Kernwood Court
Palm Harbor, Florida 34685

Dear Mr. Anderson:

Your appointment as chairperson for **Commercial Real Estate PAC** was filed in this office on August 9, 2016. Enclosed is a security envelope containing your confidential password and pin number to access the Division's Electronic Filing System (EFS). You will need to advise the treasurer and any deputy treasurer(s) of the new password in order for them to have access to the EFS.

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.

If you have questions concerning your campaign account or the EFS, you may call (850) 245-6280.

Sincerely,

A handwritten signature in black ink that reads "Kristi Reid Bronson".

Kristi Reid Bronson, Chief
Bureau of Election Records

KRB/zjs

Enclosures

pc: Steven Silverman, Treasurer

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 DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

April 13, 2020

Erik Anderson, Chairperson
Commercial Real Estate PAC
5123 Kernwood Court
Palm Harbor, FL 34685-4685

PAC 60777

Dear Mr. Anderson:

Our records indicate that you have not filed either your campaign treasurer's report or notification that no reportable activity occurred, whichever is applicable. The filing date was April 10, 2020.

The law (s. 106.07(8)(b), Fla. Stat.) requires the filing officer to immediately notify you about the missed filing date and the automatic fines that will be assessed for late filing of a report, if a report was due.

- If reportable activity occurred and you have not filed a report, statutory fines are automatically assessed as follows until you file your report:
 - \$50 per day for the first 3 days late
 - \$500 per day for each day after the 3rd day late
 - If the required report immediately precedes a primary and general election, the automatic fine is \$500 for each late day.

The total fine for the untimely report cannot exceed 25% of the total receipts or expenditures, whichever is greater, for the cover period. Even if you end up filing your report late, we cannot waive the statutory fines. We will notify you of the specific amount of fines owed once you file your report. You have 20 days from the day you receive the notice to pay the fine or to appeal the fine to the Florida Elections Commission.

- If no reportable activity occurred for the report date(s), you are still required to notify us in writing, via the Division's Electronic Filing System, that no reportable activity occurred. No automatic fines are statutorily assessed.

However, in all cases, failure to file and/or untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Kristi Reid Willis, Chief
Bureau of Election Records

cc: Steven G. Klein, Treasurer



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

Second Notice

April 28, 2020

Erik Anderson, Chairperson
Commercial Real Estate PAC
5123 Kernwood Court
Palm Harbor, FL 34685-4685

PAC 60777

Dear Mr. Anderson:

Our records indicate that you have not filed either your campaign treasurer's report or notification that no reportable activity occurred, whichever is applicable. The filing date was April 10, 2020.

We mailed, via regular mail, the first notice of the failure to file the above-mentioned report or notification to the address on file with our office on April 13, 2020.

The first notice which we provided to you specifically explained the automatic fine provisions in the law (s. 106.07(8)(b), Fla. Stat.) for failure to file a required report. Such fines are continuing to accrue for a late-filed report. Also, that notice explained that if no reportable activity occurred for the report date(s), you are still required to provide notification in writing that no reportable activity occurred. Our initial notice further indicated that, in all cases, failure to file and/or untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

A handwritten signature in black ink that reads "Kristi Reid Willis".

Kristi Reid Willis, Chief
Bureau of Election Records

cc: Steven G. Klein, Treasurer



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

May 12, 2020

Erik Anderson, Chairperson
Commercial Real Estate PAC
5123 Kernwood Court
Palm Harbor, FL 34685-4685

PAC 60777

Dear Mr. Anderson:

Our records indicate that you have not filed either your campaign treasurer's report or notification that no reportable activity occurred, whichever is applicable. The filing date was May 11, 2020.

The law (s. 106.07(8)(b), Fla. Stat.) requires the filing officer to immediately notify you about the missed filing date and the automatic fines that will be assessed for late filing of a report, if a report was due.

- If reportable activity occurred and you have not filed a report, statutory fines are automatically assessed as follows until you file your report:
 - * \$50 per day for the first 3 days late
 - * \$500 per day for each day after the 3rd day late
 - * If the required report immediately precedes a primary and general election, the automatic fine is \$500 for each late day.

The total fine for the untimely report cannot exceed 25% of the total receipts or expenditures, whichever is greater, for the cover period. Even if you end up filing your report late, we cannot waive the statutory fines. We will notify you of the specific amount of fines owed once you file your report. You have 20 days from the day you receive the notice to pay the fine or to appeal the fine to the Florida Elections Commission.

- If no reportable activity occurred for the report date(s), you are still required to notify us in writing, via the Division's Electronic Filing System, that no reportable activity occurred. No automatic fines are statutorily assessed.

However, in all cases, failure to file and/or untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Kristi Reid Willis, Chief
Bureau of Election Records

cc: Steven G. Klein, Treasurer



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee

Secretary of State

DIVISION OF ELECTIONS

Second Notice

May 26, 2020

Erik Anderson, Chairperson
Commercial Real Estate PAC
5123 Kernwood Court
Palm Harbor, FL 34685-4685

PAC 60777

Dear Mr. Anderson:

Our records indicate that you have not filed either your campaign treasurer's report or notification that no reportable activity occurred, whichever is applicable. The filing date was May 11, 2020.

We mailed, via regular mail, the first notice of the failure to file the above-mentioned report or notification to the address on file with our office on May 12, 2020.

The first notice which we provided to you specifically explained the automatic fine provisions in the law (s. 106.07(8)(b), Fla. Stat.) for failure to file a required report. Such fines are continuing to accrue for a late-filed report. Also, that notice explained that if no reportable activity occurred for the report date(s), you are still required to provide notification in writing that no reportable activity occurred. Our initial notice further indicated that, in all cases, failure to file and/or untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Kristi Reid Willis, Chief
Bureau of Election Records

cc: Steven G. Klein, Treasurer



FLORIDA DEPARTMENT OF STATE
Laurel M. Lee
 Secretary of State
 DIVISION OF ELECTIONS

Final Notice

Delivery Confirmation: USPS TRACKING # **9114 9023 0722 4421 3818 10**
 & CUSTOMER RECEIPT For Tracking or inquiries go to USPS.com
 or call 1-800-222-1811

May 12, 2020

Erik Anderson, Chairperson
 Commercial Real Estate PAC
 5123 Kernwood Court
 Palm Harbor, FL 34685-4685

PAC 60777

Dear Mr. Anderson:

A recent review of the Division's records show that the Division has not yet received the below-referenced campaign treasurer's report or the required notification that no reportable activity occurred, whichever is applicable, during the following cover period:

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2020	M3	3/1/20 - 3/31/20

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

As we stated in the prior notices, even if you now file the report or notification, the untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Kristi Reid Willis, Chief
 Bureau of Election Records

cc: Steven G. Klein, Treasurer

ALERT: DUE TO LIMITED TRANSPORTATION AVAILABILITY AS A RESULT OF NATIO...

USPS Tracking®

[FAQs >](#)

[Track Another Package +](#)

Tracking Number: 9114902307224421381810

[Remove X](#)

Your item was delivered in or at the mailbox at 1:00 pm on May 14, 2020 in PALM HARBOR, FL 34685.

[Feedback](#)

Delivered

May 14, 2020 at 1:00 pm
Delivered, In/At Mailbox
PALM HARBOR, FL 34685

[Get Updates v](#)

Text & Email Updates



Tracking History



Product Information



[See Less ^](#)



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

**Final Notice
Delivery Confirmation:**

USPS TRACKING # **9114 9023 0722 4130 1479 43**
& CUSTOMER RECEIPT For Tracking or inquiries go to USPS.com
or call 1-800-222-1811.

June 11, 2020

Erik Anderson, Chairperson
Commercial Real Estate PAC
5123 Kernwood Court
Palm Harbor, FL 34685-4685

PAC 60777

Dear Mr. Anderson:

A recent review of the Division's records show that the Division has not yet received the below-referenced campaign treasurer's report or the required notification that no reportable activity occurred, whichever is applicable, during the following cover period:

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2020	M4	4/1/20 - 4/30/20

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

As we stated in the prior notices, even if you now file the report or notification, the untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Kristi Reid Willis, Chief
Bureau of Election Records

cc: Steven G. Klein, Treasurer

ALERT: DUE TO LIMITED TRANSPORTATION AVAILABILITY AS A RESULT OF NATIO...

USPS Tracking®

[FAQs >](#)

[Track Another Package +](#)

Tracking Number: 9114902307224130147943

[Remove X](#)

Your item was delivered in or at the mailbox at 2:35 pm on June 15, 2020 in PALM HARBOR, FL 34685.

Feedback

Delivered

June 15, 2020 at 2:35 pm
Delivered, In/At Mailbox
PALM HARBOR, FL 34685

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[Text & Email Updates](#)



[Tracking History](#)



[Product Information](#)



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Florida Department of State - Division of Elections

Florida Election System Reports

Candidate/Committee Lookup
 Name:
 Election:
 Acct:
 Type:

Pol Action Comm Commercial Real Estate PAC
Name:
Account: 60777

Date Due	Type	Date Filed	Status	Days Late	Fine Assessed	Appealed	Amount Fined	Amount Paid
11/10/2020	M10	10/31/2020						
10/30/2020	G6	10/30/2020						
10/29/2020	D6	10/30/2020	CLO	1	\$0.00		\$0.00	\$0.00
10/28/2020	D5	10/30/2020	CLO	2	\$0.00		\$0.00	\$0.00
10/27/2020	D4	10/30/2020	CLO	3	\$0.00		\$0.00	\$0.00
10/26/2020	D3	10/30/2020	CLO	4	\$0.00		\$0.00	\$0.00
10/25/2020	D2	10/30/2020	CLO	5	\$0.00		\$0.00	\$0.00
10/24/2020	D1	10/30/2020	CLO	6	\$0.00		\$0.00	\$0.00
10/23/2020	G5	10/23/2020						
10/16/2020	G4A	10/15/2020						
10/9/2020	G4	10/9/2020						
10/2/2020	G3A	10/2/2020						
9/25/2020	G3	9/24/2020						
9/18/2020	G2A	9/18/2020						
9/11/2020	G2	9/11/2020						
9/4/2020	G1A	9/3/2020						
8/28/2020	G1	8/28/2020						
8/21/2020	P7A	8/20/2020						
8/14/2020	P7	8/14/2020						
8/7/2020	P6	8/6/2020						
7/31/2020	P5	7/31/2020						
7/24/2020	P4	7/24/2020						
7/17/2020	P3	7/24/2020	CLO	7	\$0.00		\$0.00	\$0.00
7/10/2020	P2A	7/24/2020	CLO	14	\$0.00		\$0.00	\$0.00
7/3/2020	P2	7/24/2020	CLO	21	\$0.00		\$0.00	\$0.00
6/26/2020	P1A	7/24/2020	CLO	28	\$0.00		\$0.00	\$0.00
6/19/2020	P1	7/24/2020	CLO	35	\$0.00		\$0.00	\$0.00
6/10/2020	M5	7/24/2020	CLO	44	\$0.00		\$0.00	\$0.00
5/11/2020	M4	7/24/2020	CLO	74	\$0.00		\$0.00	\$0.00
4/10/2020	M3	7/31/2020	CLO	112	\$0.00		\$0.00	\$0.00
3/10/2020	M2	3/6/2020						
2/10/2020	M1	2/10/2020						
1/10/2020	M12	1/10/2020						
12/10/2019	M11	12/10/2019						
11/12/2019	M10	11/12/2019						
10/10/2019	M9	10/10/2019						
9/10/2019	M8	9/10/2019						
8/12/2019	M7	8/12/2019						
7/10/2019	M6	7/10/2019						
6/10/2019	M5	6/11/2019	CLO	1	\$0.00		\$0.00	\$0.00
5/10/2019	M4	5/1/2019						
4/10/2019	M3	4/2/2019						
3/11/2019	M2	3/11/2019						
2/11/2019	M1	2/16/2019	CLO	5	\$0.00		\$0.00	\$0.00

11/18/2020

FEC - Candidate/Committee Filing History Report

1/10/2019	M12	1/3/2019					
12/10/2018	M11	12/3/2018					
11/2/2018	G7	11/2/2018					
11/1/2018	D6	11/1/2018					
10/31/2018	D5	10/31/2018					
10/30/2018	D4	10/30/2018					
10/29/2018	D3	10/29/2018					
10/28/2018	D2	10/28/2018					
10/27/2018	D1	10/27/2018					
10/26/2018	G6	10/25/2018					
10/25/2018	G4	10/11/2018					
10/19/2018	G5	10/15/2018					
10/5/2018	G3	10/2/2018					
9/28/2018	G2A	9/24/2018					
9/21/2018	G2	9/18/2018					
9/14/2018	G1A	9/14/2018					
9/7/2018	G1	9/4/2018					
8/31/2018	P7A	8/27/2018					
8/24/2018	P7	8/24/2018					
8/17/2018	P6	8/14/2018					
8/10/2018	P5	8/8/2018					
8/3/2018	P4	7/31/2018					
7/27/2018	P3	7/24/2018					
7/20/2018	P2A	7/17/2018					
7/13/2018	P2	7/10/2018					
7/6/2018	P1A	7/3/2018					
6/29/2018	P1	6/26/2018					
6/11/2018	M5	6/5/2018					
5/10/2018	M4	5/11/2018	CLO	1	\$0.00	\$0.00	\$0.00
4/10/2018	M3	4/9/2018					
3/12/2018	M2	3/12/2018					
2/12/2018	M1	2/1/2018					
1/10/2018	M12	1/3/2018					
12/11/2017	M11	12/6/2017					
11/13/2017	M10	11/1/2017					
10/10/2017	M9	10/5/2017					
9/22/2017	M8	9/7/2017					
8/10/2017	M7	8/7/2017					
7/10/2017	M6	7/5/2017					
6/12/2017	M5	6/1/2017					
5/10/2017	M4	5/1/2017					
4/10/2017	M3	4/4/2017					
3/11/2017	M2	3/3/2017					
2/10/2017	M1	2/3/2017					
1/10/2017	M12	1/6/2017					
12/12/2016	M11	12/8/2016					
11/4/2016	D6	11/3/2016					
11/4/2016	G7	11/4/2016					
11/2/2016	D5	11/2/2016					
11/1/2016	D4	11/1/2016					
10/31/2016	D3	10/31/2016					
10/30/2016	D2	10/30/2016					
10/29/2016	D1	10/29/2016					
10/28/2016	G6	10/24/2016					

<https://doesecure.dos.state.fl.us/FEC/FilingHistory.Aspx?AcctNum=60777&cboElection=&cboType=PAC&txtName=commercial real estate>

2/4

11/18/2020

FEC - Candidate/Committee Filing History Report

10/21/2016	G5	10/17/2016					
10/14/2016	G4	10/10/2016					
10/7/2016	G3	10/5/2016					
9/30/2016	G2A	9/26/2016					
9/23/2016	G2	9/19/2016					
9/16/2016	G1A	9/13/2016					
9/9/2016	G1	9/6/2016					
9/2/2016	P7A	8/30/2016					
8/26/2016	P7	8/26/2016					
8/19/2016	P6	8/16/2016					
8/12/2016	P5	8/9/2016					
8/5/2016	P4	8/2/2016					
7/29/2016	P3	7/25/2016					
7/22/2016	P2A	7/19/2016					
7/15/2016	P2	7/11/2016					
7/8/2016	P1A	7/5/2016					
7/1/2016	P1	6/28/2016					
6/10/2016	M5	6/1/2016					
5/10/2016	M4	5/3/2016					
4/11/2016	M3	4/4/2016					
3/10/2016	M2	3/7/2016					
2/10/2016	M1	2/5/2016					
1/11/2016	M12	1/6/2016					
12/10/2015	M11	12/2/2015					
11/10/2015	M10	11/2/2015					
10/13/2015	M9	10/7/2015					
9/10/2015	M8	9/2/2015					
8/10/2015	M7	8/5/2015					
7/10/2015	M6	7/1/2015					
6/10/2015	M5	6/3/2015					
5/11/2015	M4	5/4/2015					
4/10/2015	M3	4/9/2015					
3/10/2015	M2	3/11/2015	CLO	1	\$50.00	\$50.00	\$50.00
2/10/2015	M1	2/9/2015					
1/12/2015	M12	1/12/2015					
12/10/2014	M11	12/10/2014					
11/10/2014	M10	11/10/2014					
10/31/2014	G7	10/31/2014					
10/30/2014	D6	10/30/2014					
10/29/2014	D5	10/29/2014					
10/28/2014	D4	10/28/2014					
10/27/2014	D3	10/27/2014					
10/26/2014	D2	10/26/2014					
10/25/2014	D1	10/24/2014					
10/24/2014	G6	10/22/2014					
10/17/2014	G5	10/17/2014					
10/10/2014	G4	10/10/2014					
10/3/2014	G3	10/3/2014					
9/26/2014	G2A	9/26/2014					
9/19/2014	G2	9/19/2014					
9/12/2014	G1A	9/12/2014					
9/5/2014	G1	9/5/2014					
8/29/2014	P7A	8/28/2014					
8/22/2014	P7	8/21/2014					

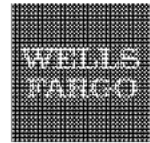
11/18/2020

FEC - Candidate/Committee Filing History Report

8/15/2014	P6	8/12/2014
8/8/2014	P5	8/6/2014
8/1/2014	P4	7/30/2014
7/25/2014	P3	7/23/2014
7/18/2014	P2A	7/14/2014
7/11/2014	P2	7/8/2014
7/4/2014	P1A	7/3/2014
6/27/2014	P1	6/24/2014
6/10/2014	M5	6/9/2014
5/12/2014	M4	5/8/2014
4/10/2014	M3	4/8/2014
3/10/2014	M2	3/6/2014
2/10/2014	M1	2/8/2014
1/10/2014	M12	1/8/2014
12/10/2013	M11	12/5/2013
11/12/2013	M10	11/7/2013
10/10/2013	Q3	10/3/2013

Wells Fargo Simple Business Checking

March 26, 2020 • Page 1 of 3



REDACTED INFORMATION FALLS OUTSIDE THE SCOPE OF THE ORDER

COMMERCIAL REAL ESTATE PAC
 5123 KERNWOOD CT
 PALM HARBOR FL 34685-3616

Questions?

Available by phone 24 hours a day, 7 days a week:
 Telecommunications Relay Services calls accepted

1-800-CALL-WELLS (1-800-225-5935)

TTY: 1-800-877-4833

En español: 1-877-337-7454

Online: wellsfargo.com/biz

Write: Wells Fargo Bank, N.A. (287)

P.O. Box 6995

Portland, OR 97228-6995

Your Business and Wells Fargo

Visit wellsfargoworks.com to explore videos, articles, infographics, interactive tools, and other resources on the topics of business growth, credit, cash flow management, business planning, technology, marketing, and more.

Account options

A check mark in the box indicates you have these convenient services with your account(s). Go to wellsfargo.com/biz or call the number above if you have questions or if you would like to add new services.

- Business Online Banking
- Online Statements
- Business Bill Pay
- Business Spending Report
- Overdraft Protection

Activity summary

Beginning balance on 2/29

Deposits/Credits

Withdrawals/Debits

Ending balance on 3/26

Average ledger balance this period



Account number



COMMERCIAL REAL ESTATE PAC

Florida account terms and conditions apply

For Direct Deposit use

Routing Number (RTN): 063107513

For Wire Transfers use

Routing Number (RTN): 121000248

Overdraft Protection

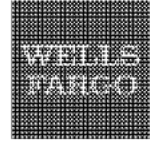
This account is not currently covered by Overdraft Protection. If you would like more information regarding Overdraft Protection and eligibility requirements please call the number listed on your statement or visit your Wells Fargo store.

Monthly service fee summary

For a complete list of fees and detailed account information, see the Wells Fargo Account Fee and Information Schedule and Account Agreement applicable to your account (EasyPay Card Terms and Conditions for prepaid cards) or talk to a banker. Go to wellsfargo.com/feefaq for a link to these documents, and answers to common monthly service fee questions.

Wells Fargo Simple Business Checking

April 27, 2020 • Page 1 of 3



COMMERCIAL REAL ESTATE PAC
5123 KERNWOOD CT
PALM HARBOR FL 34685-3616

Questions?

Available by phone 24 hours a day, 7 days a week:
Telecommunications Relay Services calls accepted

1-800-CALL-WELLS (1-800-225-5935)

TTY: 1-800-877-4833

En español: 1-877-337-7454

Online: wellsfargo.com/biz

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Account options

A check mark in the box indicates you have these convenient services with your account(s). Go to wellsfargo.com/biz or call the number above if you have questions or if you would like to add new services.

Business Online Banking	<input checked="" type="checkbox"/>
Online Statements	<input checked="" type="checkbox"/>
Business Bill Pay	<input type="checkbox"/>
Business Spending Report	<input checked="" type="checkbox"/>
Overdraft Protection	<input type="checkbox"/>

Activity summary

Beginning balance on 3/27	\$11,182.25
Deposits/Credits	200.00
Withdrawals/Debits	- 0.00
Ending balance on 4/27	\$11,382.25
Average ledger balance this period	\$11,301.00

Account number: [REDACTED]

COMMERCIAL REAL ESTATE PAC

Florida account terms and conditions apply

For Direct Deposit use

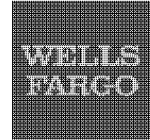
Routing Number (RTN): 063107513

For Wire Transfers use

Routing Number (RTN): 121000248

Overdraft Protection

This account is not currently covered by Overdraft Protection. If you would like more information regarding Overdraft Protection and eligibility requirements please call the number listed on your statement or visit your Wells Fargo store.



Transaction history

Date	Check Number	Description	Deposits/ Credits	Withdrawals/ Debits	Ending daily balance
4/9		Deposit Made In A Branch/Store	200.00		11,382.25
Ending balance on 4/27					11,382.25
Totals			\$200.00	\$0.00	

The Ending Daily Balance does not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when your transactions posted. If you had insufficient available funds when a transaction posted, fees may have been assessed.

Monthly service fee summary

For a complete list of fees and detailed account information, see the Wells Fargo Account Fee and Information Schedule and Account Agreement applicable to your account (EasyPay Card Terms and Conditions for prepaid cards) or talk to a banker. Go to wellsfargo.com/feefaq for a link to these documents, and answers to common monthly service fee questions.

Fee period 03/27/2020 - 04/27/2020 Standard monthly service fee \$10.00 You paid \$0.00

The bank has waived the fee for this fee period.

How to avoid the monthly service fee

Have any **ONE** of the following account requirements

- Average ledger balance

Minimum required

\$500.00

This fee period

\$11,301.00

C1/C1

Account transaction fees summary

Service charge description	Units used	Units included	Excess units	Service charge per excess units (\$)	Total service charge (\$)
Cash Deposited (\$)	0	3,000	0	0.0030	0.00
Transactions	2	50	0	0.50	0.00
Total service charges					\$0.00

Wells Fargo Simple Business Checking

May 28, 2020 • Page 1 of 3



COMMERCIAL REAL ESTATE PAC
5123 KERNWOOD CT
PALM HARBOR FL 34685-3616

Questions?

Available by phone 24 hours a day, 7 days a week:
Telecommunications Relay Services calls accepted

1-800-CALL-WELLS (1-800-225-5935)

TTY: 1-800-877-4833

En español: 1-877-337-7454

Online: wellsfargo.com/biz

Write: Wells Fargo Bank, N.A. (287)
P.O. Box 6995
Portland, OR 97228-6995

Your Business and Wells Fargo

Visit wellsfargoworks.com to explore videos, articles, infographics, interactive tools, and other resources on the topics of business growth, credit, cash flow management, business planning, technology, marketing, and more.

Account options

A check mark in the box indicates you have these convenient services with your account(s). Go to wellsfargo.com/biz or call the number above if you have questions or if you would like to add new services.

Business Online Banking	<input checked="" type="checkbox"/>
Online Statements	<input checked="" type="checkbox"/>
Business Bill Pay	<input type="checkbox"/>
Business Spending Report	<input checked="" type="checkbox"/>
Overdraft Protection	<input type="checkbox"/>

Statement period activity summary

Beginning balance on 4/28	\$11,382.25
Deposits/Credits	0.00
Withdrawals/Debits	- 0.00
Ending balance on 5/28	\$11,382.25
Average ledger balance this period	\$11,382.25

Account number: [REDACTED]

COMMERCIAL REAL ESTATE PAC

Florida account terms and conditions apply

For Direct Deposit use

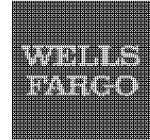
Routing Number (RTN): 063107513

For Wire Transfers use

Routing Number (RTN): 121000248

Overdraft Protection

This account is not currently covered by Overdraft Protection. If you would like more information regarding Overdraft Protection and eligibility requirements please call the number listed on your statement or visit your Wells Fargo branch.



Monthly service fee summary

For a complete list of fees and detailed account information, see the Wells Fargo Account Fee and Information Schedule and Account Agreement applicable to your account (EasyPay Card Terms and Conditions for prepaid cards) or talk to a banker. Go to wellsfargo.com/feefaq for a link to these documents, and answers to common monthly service fee questions.

Fee period 04/28/2020 - 05/28/2020 Standard monthly service fee \$10.00 You paid \$0.00

The bank has waived the fee for this fee period.

How to avoid the monthly service fee

Have any **ONE** of the following account requirements

· Average ledger balance

Minimum required

\$500.00

This fee period

\$11,382.00

C1/C1

Account transaction fees summary

Service charge description	Units used	Units included	Excess units	Service charge per excess units (\$)	Total service charge (\$)
Cash Deposited (\$)	0	3,000	0	0.0030	0.00
Transactions	0	50	0	0.50	0.00
Total service charges					\$0.00



IMPORTANT ACCOUNT INFORMATION

Effective June 20, 2020, we are updating the Funds Availability Policy in our Deposit Account Agreement as follows:

In the "Longer delays may apply" section, when a longer delay applies, we are making the following changes:

- The amount of your deposit that may be available on the first business day after the day of your deposit is increasing from \$200 to \$225.
- We are changing the check deposit amount exception that may lead to a delay of generally no more than seven business days from "You deposit checks totaling more than \$5,000 on any one day" to "You deposit checks totaling more than \$5,525 on any one day."

In the "Special rules for new accounts" section, setting forth special rules that apply during the first 30 days your account is open, we are updating the amounts in the two bullets in the second paragraph from \$5,000 to \$5,525 and from \$200 to \$225 as follows:

- The first \$5,525 of a day's total deposits of cashier's, certified, teller's, traveler's, and federal, state, and local government checks and U.S. Postal Service money orders made payable to you will be available on the first business day after the day of your deposit.
- The excess over \$5,525 and funds from all other check deposits will be available on the seventh business day after the day of your deposit. The first \$225 of a day's total deposit of funds from all other check deposits, however, may be available on the first business day after the day of your deposit.

AFFIDAVIT OF BACKGROUND INFORMATION
Case Number: FEC 20-156

STATE OF FLORIDA
County of Pinellas

Erik Anderson, being duly sworn, says:

1. This affidavit is made upon my personal knowledge.
2. I am of legal age and competent to testify to the matters stated herein. I am currently employed by Commercial Partners Realty, Inc. RE Agent.

3. Have you ever run for public office? If so, please name the office(s) you ran for and the date(s) of the election(s) you ran in.

No

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

No

5. Have you ever held the office of chairperson, treasurer, board member, or other similar position for a political committee? If so, please list the names and addresses of the committees and dates when you held the position.

No

6. Have you ever prepared or signed a campaign treasurer's report? If so, please list the name of the candidate or committee whose report you prepared or signed.

_____ No _____

7. What action have you taken to determine your responsibilities under Florida's election laws?

_____ I am Chairman of the CRE PAC _____

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

9. If so, when did you first obtain it?

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

11. Do you possess a copy of the *Political Committee Handbook*? Yes No

12. If so, when did you first obtain it?

13. Have you read the *Political Committee Handbook*? Yes No

14. Do you possess a copy of the *Political Committee EFS User's Guide*? Yes No

15. If so, when did you first obtain it?


_____ Yes No

16. Have you read the *Political Committee EFS User's Guide*?

17. For each of the following reporting periods, please explain the reason why you either failed to timely file a campaign treasurer's report for Commercial Real Estate PAC disclosing all information required by Chapter 106, Florida Statutes, or failed to timely notify the filing officer on the prescribed reporting date that no report would be filed on that date because the political committee had not received funds, made contributions, or expended reportable funds: 2020 M3 and 2020 M4.

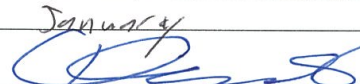
The CRE PAC changed officers and there was
a miscommunication between the state
and the CRE PAC Treasurer

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 11 day of
January, 2021.



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



Tyhira Walters
Comm. # HH053387
Expires: Oct. 14, 2024
Bonded Thru Aaron Notary

Personally Known or Produced Identification _____
Type of Identification Produced: _____

Case Investigator: CM

RECEIVED

16 AUG -9 PM 3: 38

DIVISION OF ELECTIONS
SECRETARY OF STATE

July 26, 2016

Division of Elections
Tallahassee, FL

To Whom it May Concern:

Please accept this letter of notification to change our chairperson who is currently listed as Mark Blanton, email: markeblanton@gmail.com to our new chairperson, Erik Anderson, email: erik@cprtcam.com effective August 15, 2016.

Please provide Mr. Anderson with his own reviewer PIN code for our PAC filings with the state.

Thank you for your assistance and immediate attention to this matter.

Sincerely,



David Fern

Deputy Treasurer, Commercial Real Estate PAC

COMMERCIAL REAL ESTATE PAC

1103 KENNWOOD COURT PALM HARBOR, FL 34685 727-942-4503


**APPOINTMENT OF CAMPAIGN TREASURER
AND DESIGNATION OF CAMPAIGN
DEPOSITORY FOR
POLITICAL COMMITTEES**
(Sections 106.011(1) and 106.021(1), F.S.)

RECEIVED
16 SEP -9 AM 9:30
DIVISION OF ELECTIONS
SECRETARY OF STATE

CHECK APPROPRIATE BOX:

OFFICE USE ONLY

Original Appointment of Treasurer Reappointment of Treasurer Deputy Treasurer

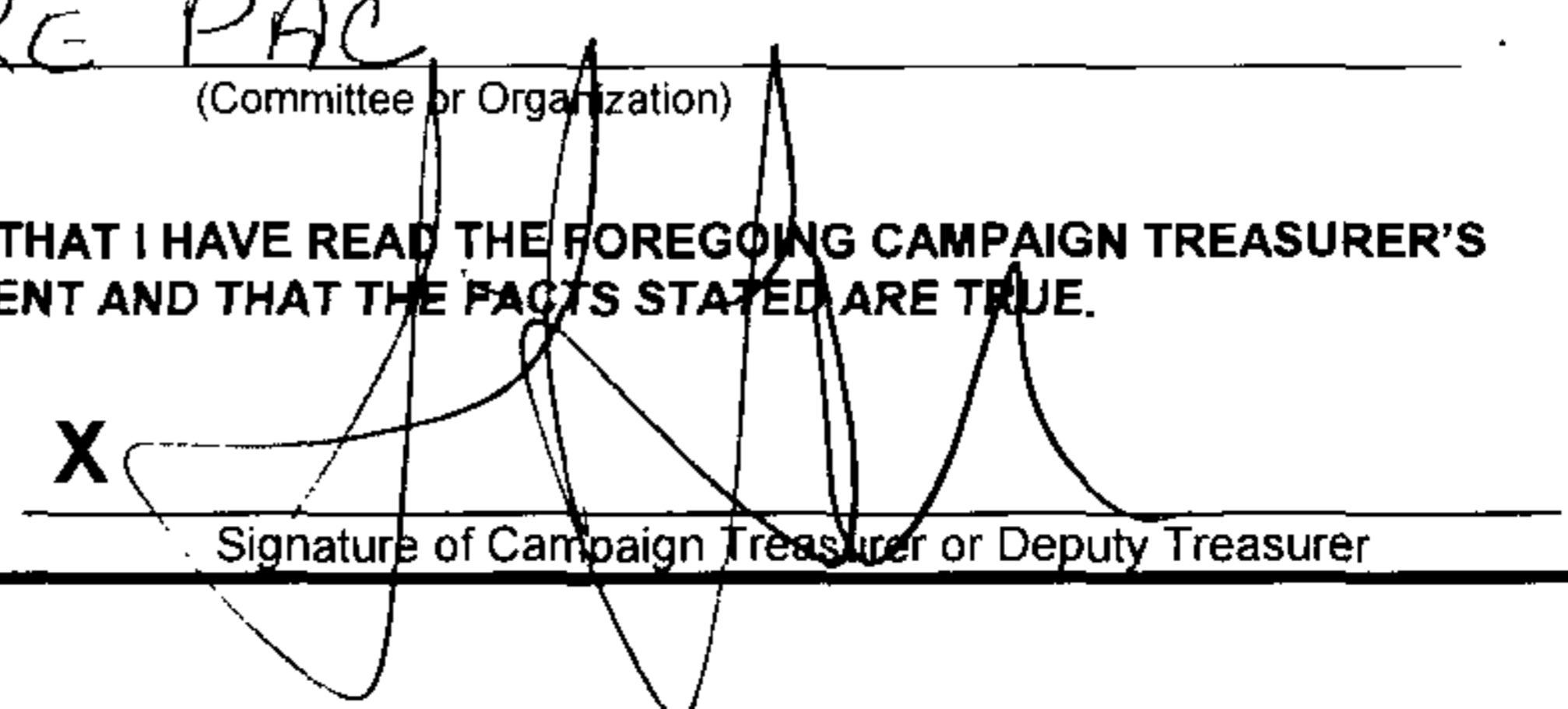
1. Committee or Organization <u>CRE PAC - 60777</u>		2. Telephone <u>(727) 942-4503</u>	
3. Name of Treasurer or Deputy Treasurer <u>Steven G. Klein</u>		4. Email (optional) <u>stevek@tampabay.com</u>	
5. Telephone (optional)			
6. Mailing Address <u>5123 Kernwood Ct., Palm Harbor, FL 34685</u>			
7. Street Address <u>5123 Kernwood Ct., Palm Harbor, FL 34685</u>			
8. The following bank has been designated as the <input checked="" type="checkbox"/> Primary Depository <input type="checkbox"/> Secondary Depository			
9. Name of Bank <u>Wells Fargo Bank</u>		10. Street Address <u>4949 Ridgemoor Blvd.</u>	
11. City <u>Palm Harbor</u>		12. State <u>FL</u>	13. Zip Code <u>34685</u>
14. Signature of Chairman <input checked="" type="checkbox"/> 		15. Name of Chairman (Print or Type) <u>Erik Anderson</u>	

Campaign Treasurer's Acceptance of Appointment

I, Steven G. Klein, do hereby accept the appointment as
(Please Print or Type)
treasurer or deputy treasurer for CRE PAC
(Committee or Organization)

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING CAMPAIGN TREASURER'S
ACCEPTANCE OF APPOINTMENT AND THAT THE FACTS STATED ARE TRUE.

8/18/16
Date


Signature of Campaign Treasurer or Deputy Treasurer

INCOMPLETE

RECEIVED

2020 MAY 19 AM 9:51

DIVISION OF ELECTIONS
TALLAHASSEE, FL

**APPOINTMENT OF CAMPAIGN TREASURER
AND DESIGNATION OF CAMPAIGN
DEPOSITORY FOR
POLITICAL COMMITTEES**
(Sections 106.011(2) and 106.021(1), F.S.)

CHECK APPROPRIATE BOX:

Initial Filing for Primary Treasurer Deputy Treasurer

Re-filing to Change Primary Treasurer Deputy Treasurer Primary/Secondary Depository

OFFICE USE ONLY

1 Committee
Commercial Real Estate PAC

2 Telephone
(727) 942-4503

3 Name of Treasurer or Deputy Treasurer

4 Email (optional)

5 Telephone (optional)

William M. Roberts

Broberts.tampa@gmail.com

(813) 833-4398

6 Mailing Address
14711 Clarendon Dr., Tampa, FL 33624

7 Street Address
Same

8 The following bank has been designated as the Primary Depository Secondary Depository

9 Name of Bank

10. Street Address:

11 City

12 State

13 Zip Code

14 Signature of Chairman

15 Name of Chairman (Print or Type)

X

Campaign Treasurer's Acceptance of Appointment

William M. Roberts

I, _____, do hereby accept the appointment as

(Please Print or Type)

treasurer or deputy treasurer for

Commercial Real Estate PAC

(Committee)

**UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING CAMPAIGN TREASURER'S
ACCEPTANCE OF APPOINTMENT AND THAT THE FACTS STATED ARE TRUE.**

5/5/20

Date

X

William M. Roberts
Signature of Campaign Treasurer or Deputy Treasurer

**APPOINTMENT OF CAMPAIGN TREASURER
AND DESIGNATION OF CAMPAIGN
DEPOSITORY FOR
POLITICAL COMMITTEES**
(Sections 106.011(2) and 106.021(1), F.S.)

RECEIVED
DEPARTMENT OF STATE
2020 JUL -8 AM 9:09
DEPARTMENT OF STATE
DIVISION OF ELECTIONS

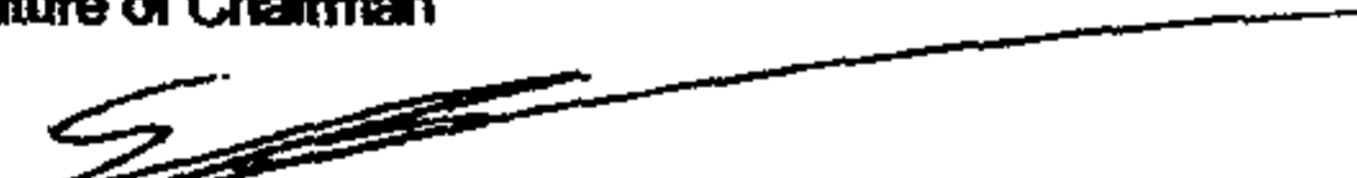
INCOMPLETE

CHECK APPROPRIATE BOX:

Initial Filing for: Primary Treasurer Deputy Treasurer

Re-filing to Change: Primary Treasurer Deputy Treasurer Primary/Secondary Depository


OFFICE USE ONLY

1. Committee <i>Commercial Real Estate PAC</i>		2. Telephone <i>(727) 939-4227</i>	
3. Name of Treasurer or Deputy Treasurer <i>William M. Roberts</i>		4. Email (optional) <i>Broberts.Tampa@gmail</i>	
5. Telephone (optional) <i>(813) 833-4398</i>		6. Mailing Address <i>14711 Clarendon Pr., Tampa, FL 33624</i>	
7. Street Address			
8. The following bank has been designated as the <input checked="" type="checkbox"/> Primary Depository <input type="checkbox"/> Secondary Depository			
9. Name of Bank <i>Wells Fargo Bank, N.A</i>		10. Street Address <i>4949 Ridgemoor Blvd.</i>	
11. City <i>Palm Harbor</i>	12. State <i>FL</i>	13. Zip Code <i>34685</i>	
14. Signature of Chairman <i>X</i> 		15. Name of Chairman (Print or Type) <i>Erik Anderson</i>	

Campaign Treasurer's Acceptance of Appointment

I, *William M. Roberts*, do hereby accept the appointment as
(Please Print or Type)
treasurer or deputy treasurer for *Commercial Real Estate PAC*
(Committee)

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING CAMPAIGN TREASURER'S
ACCEPTANCE OF APPOINTMENT AND THAT THE FACTS STATED ARE TRUE.

6/23/2020 Date *X* 
Signature of Campaign Treasurer or Deputy Treasurer

DS-DE 6 (Rev. 4/19)

INCOMPLETE

RECEIVED
DEPARTMENT OF STATE

2020 JUL -8 AM 9:33

DEPARTMENT OF STATE
DIVISION OF ELECTIONS

July 3, 2020

Please accept these

change forms:

- 1) Change of Treasurer
- 2) Change Registered Agent

Commercial Real Estate PAC

60777

thank you

Bill Roberts

813 833-4398

July 10, 2020

RECEIVED
DEPARTMENT OF STATE
2020 JUL 27 AM 9:12
DEPARTMENT OF STATE
DIVISION OF ELECTIONS

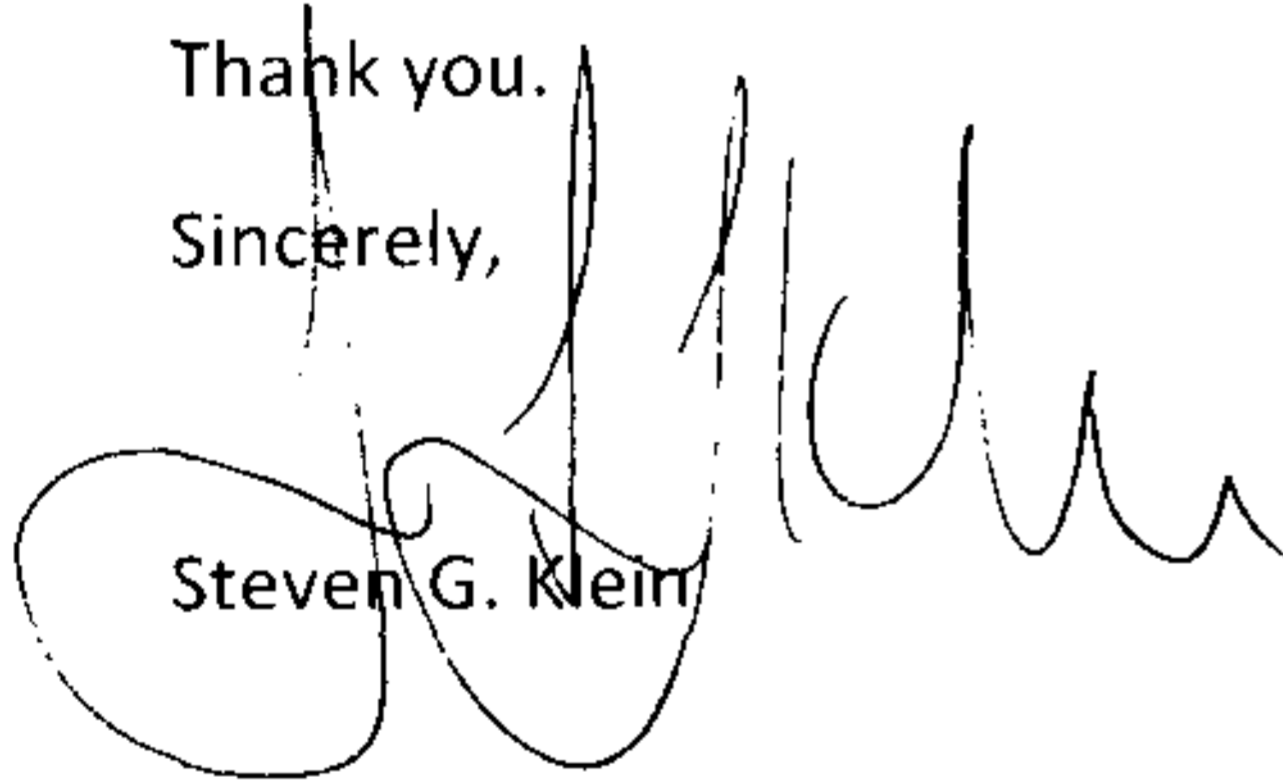
Division of Elections, State of Florida
R. A Gray Building, Suite 316
500 South Bronough Street
Tallahassee, FL 32399

Dear DOE,

Please accept this official Letter of Resignation as Campaign Treasurer of the Commercial Real Estate PAC, ID # 60777, effective immediately.

Thank you.

Sincerely,



Steven G. Klein

cc: Erik Anderson, Chairman

William M. Roberts
14711 Clarendon Dr.
Tampa, FL 33624

RECEIVED
DEPARTMENT OF STATE
2020 JUL 27 AM 9:12
DEPARTMENT OF STATE
DIVISION OF ELECTIONS

July 23, 2020

Division of Elections
R. A. Gray Building, Suite 316
500 South Bronough Street
Tallahassee, FL 32399-0250

Re: Commercial Real Estate PAC - #60777

Dear DOE,

Enclosed please find original, signed form DS-DE 06 to change the designated Treasurer for the above referenced committee.

As your records will show, this is our third attempt to effectuate this change. And I hope we have executed the form properly.

Also enclosed is an original signed letter of resignation from Mr. Steven Klein, the current Treasurer of record for the committee.

Please contact me immediately if there is any further action required to make this change. I can be reached via my cell phone at 813-833-4398 or via email at BillRobertsCommercial@Gmail.com.

Thank you for your attention to this urgent matter.

Sincerely,



Bill Roberts

**APPOINTMENT OF CAMPAIGN TREASURER
AND DESIGNATION OF CAMPAIGN
DEPOSITORY FOR
POLITICAL COMMITTEES**
(Sections 106.011(2) and 106.021(1), F.S.)


RECEIVED
DEPARTMENT OF STATE
2020 JUL 27 AM 9:12
DEPARTMENT OF STATE
DIVISION OF ELECTIONS

CHECK APPROPRIATE BOX:

Initial Filing for: Primary Treasurer Deputy Treasurer

Re-filing to Change: Primary Treasurer Deputy Treasurer Primary/Secondary Depository

OFFICE USE ONLY

1. Committee <i>Commercial Real Estate PAC</i>		2. Telephone <i>(727) 939-4227</i>	
3. Name of Treasurer or Deputy Treasurer <i>William M. Roberts</i>		4. Email (optional) <i>Broberts.Tampa@gmail</i>	
5. Telephone (optional) <i>(813) 833-4398</i>			
6. Mailing Address <i>14711 Clarendon Dr., Tampa, FL 33624</i>			
7. Street Address			
8. The following bank has been designated as the <input checked="" type="checkbox"/> Primary Depository <input type="checkbox"/> Secondary Depository			
9. Name of Bank <i>Wells Fargo Bank, N.A</i>		10. Street Address <i>4949 Ridgemoor Blvd.</i>	
11. City <i>Palm Harbor</i>		12. State <i>FL</i>	13. Zip Code <i>34685</i>
14. Signature of Chairman <i>X</i> 		15. Name of Chairman (Print or Type) <i>Erik Anderson</i>	

Campaign Treasurer's Acceptance of Appointment

I, *William M. Roberts*, do hereby accept the appointment as
(Please Print or Type)
treasurer or deputy treasurer for *Commercial Real Estate PAC*
(Committee)

**UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING CAMPAIGN TREASURER'S
ACCEPTANCE OF APPOINTMENT AND THAT THE FACTS STATED ARE TRUE.**

6/23/2020
Date

X *William M. Roberts*
Signature of Campaign Treasurer or Deputy Treasurer

HISTORY NOTES
Commercial Real Estate PAC - 60777

Unique ID	Date Recorded	Last Edited Date	Originally Recorded By
71062	8/28/2020 2:53:00 PM		dsbrown
RE: Credential Request Form			
Spoke to Bill Roberts. Gave him his pin.			
70416	7/30/2020 10:18:00 AM	7/31/2020 1:39:08 PM	mcchellman
Re T PIN, reached T's VM at his second number - (813) 833-4398 - left a detailed message at 10:20 am asking him to call me for his PIN.			
I called T Williams again, reached him 7/31/20 1:30 pm, and gave him his PIN. He knew the report was due today and how long someone would be in the office to assist if necessary. He said he would do the report in the next hour.			
69961	7/9/2020 9:40:00 AM		zjsantos
RE: Incomplete DS-DE 6 & 41			
I spoke with Mr. Roberts back on 5/19/20 about them & he stated that he will resubmit, along with the letter to appoint the new treasurer.			
69931	7/8/2020 12:12:00 PM	7/10/2020 3:10:21 PM	mcchellman
Re 6 & 41 received, called to-be T Mr. Roberts and left a detailed message re need to new original 6 and why, as well as either a letter of removal signed by C, or a letter of resignation signed by outgoing T. I left my number and asked him to call me.			
Mr. Roberts called me back 7/10/20 3:10 pm. I explained need for oginally signed 6, and either the letter of removal or resignation.			
50120	9/7/2016 10:35:00 AM		zjsantos
RE: Reappointment Of Treasurer			
I spoke with the PAC and informed them that we need an original DS-DE 6 and not a copy, they stated they will overnight it to us.			
42055	3/24/2015 9:48:00 AM		ljrandolph
RE: Incomplete Paperwork			
I spoke to the secretary besides Suzanne for the Commercial Real Estate PAC, and I explained to her the issue why we weren't able to process the new treasurer because two treasurers signed the form. I explained to her that we need a new form with only the new deputy signing the form.			
41878	3/11/2015 10:20:00 AM		dsbrown
RE: Credential Request Form			
Called and spoke to Suzanne Giacchino; gave her Steve Silverman's (treasure) PIN.			
41863	3/11/2015 7:37:00 AM		jvquinn
RE: M2 Report			
3/10/2015 - I spoke with an office worker who claims to be apart of the PAC. She did not provide me a name. The caller was irate because the Division refused to give her the pin numbers to the account over the phone and without a credential request form. She stated that the Division removed Ms. Swayze (former Primary Treasurer) without authorization and that she needs us to add her back on as a treasurer and provided her with the correct pins so that the PAC may do the M2 report. She stated that early on today (3/10/2015) she spoke with two other employees from the Division that were giving her a hard time by not providing the pins. I guided the caller to our website where all documents are imaged and explained to her that the reason Ms. Swayze was removed was because Mr. Roberts (chairperson to the PAC) requested her removal and completed the appropriate form to add Mr. Silverman as the new primary treasurer. The caller confirmed that she had seen the documents but insisted that Mr. Roberts made a mistake and that the Division should correct Mr. Roberts "mistake". She went on to say that she has called, texted and e-mailed the new treasurer Mr. Silverman for his password to complete the report and that her and the office staff had no success in reaching out to MR. Silverman. I again told her that the Division will not provide her with a pin number unless authorized by the treasurer and or chair through a credential request form. She said she does not agree and that if she is to gets fine for not completing the report it will be the Division fault for removing Ms. Swayze as the trasurer.			

HISTORY NOTES
Commercial Real Estate PAC - 60777

Unique ID	Date Recorded	Last Edited Date	Originally Recorded By
41859	3/10/2015 4:29:00 PM		jhayala
<p>Re: Credential Request Form</p> <p>Rcvd call from Commercial Real Estate PAC regarding Treasurer pin. They do not have Mr. Silverman's pin. I suggested they fill out an EFS Credential Request Form. Will send in form to have pin released. Jha</p>			
41432	2/25/2015 9:29:00 AM		zjsantos
<p>RE: Incomplete paperwork</p> <p>I spoke with an assistant of the PAC and explained the error on the DS-DE6 and that we need a new original one corrected and submitted to us so we can process Mr. Fern into the system as their new Deputy Treasurer.</p>			
41421	2/25/2015 9:01:00 AM		zjsantos
<p>RE: Incomplete paperwork</p> <p>I was able to leave a voicemail for the chairperson Mr. Roberts regarding the error on the DS-DE6 and informed him that we need a new one submitted with the Deputy Treasurer's signature, I also left him my telephone number in case he has any questions.</p>			
40289	11/26/2014 2:55:00 PM		ljrandolph
<p>Incomplete Paperwork</p> <p>I called and left a voicemail for the chairperson and the treasurer about the incomplete treasurer change. I explained in the voicemail that the application is incomplete and that it need to be resubmitted. I left my contact information for the committee to return my call so we can discuss the issues.</p>			
37731	2/27/2014 3:59:00 PM		dsbrown
<p>RE: Compliance Audit</p> <p>Mailed Compliance Audit for 2013 M11 and M12, and 2014 M1 reports.</p>			

**FLORIDA ELECTIONS COMMISSION
PHONE LOG
Case No.: FEC 20-156**

Respondent: Commercial Real Estate PAC

Complainant: Division

1. **Date and time:** 09/17/2020; 01:59 p.m.
Name: Wells Fargo Summons and Subpoenas Department
Phone #: (480) 724-2000
Summary: I called Wells Fargo Summons and Subpoenas Department to speak to Santina Moore about their response dated September 1, 2020. I spoke with Kyle who assisted me due to Santina Moore being in another state. Kyle requested I provide the copy of the fine payment check associated with the Wells Fargo account associated with Commercial Real Estate PAC to email: subpoenafax@wellsfargo.com. Kyle stated he would include a memo to this subpoena request that this information was being submitted.
Memo to File? No
Entered by: CM

2. **Date and time:** 11/17/2020; 03:15 p.m.
Name: Erik Anderson - Chair
Phone #: (727) 939-4227
Summary: Called (727) 939-4227 and spoke with Sue Fern, Executive Director, Florida Gulfcoast Commercial Association of Realtors. She provided a contact number of (727) 822-4715 for Erik Anderson, Chair for Commercial Real Estate PAC.
Memo to File? No
Entered by: CM

3. **Date and time:** 11/17/2020; 04:17 p.m.
Name: Erik Anderson - Chair
Phone #: (727) 822-4715
Summary: Called and spoke with a receptionist who forwarded me to Mr. Anderson. An automated voice message was reached. I identified who I was and who I am with. I asked that Mr. Anderson return my call at his earliest convenience at (850) 922-4539.
Memo to File? No
Entered by: CM

4. **Date and time:** 11/17/2020; 04:58 p.m.
Name: Erik Anderson - Chair
Phone #: (727) 417-5417
Summary: Called and spoke with Mr. Anderson after he left message to call back at (727) 417-5417. I informed him I was working on FEC 20-156. I asked if he had received the cover letter and affidavit mailed to him at 5123 Kerwood Court, Palm Harbor, Florida 34685

and he said he does not know of that address. He requested I send the cover letter and affidavit again to erik@cprteam.com. I told him I would send it on November 18, 2020.

Memo to File? No

Entered by: CM

5. **Date and time:** 12/15/2020; 10:19 a.m.

Name: Erik Anderson - Chair

Phone #: (727) 417-5417

Summary: Spoke with Mr. Anderson to follow-up on affidavit FEC 20-156 sent to him on November 18, 2020. He apologized for the delay in returning affidavit. He said he provided it to his attorney, who did not return it, and then he forgot about it due to the holidays. He stated he would immediately contact his attorney and try to get the affidavit completed and submitted by next week.

Memo to File? No

Entered by: CM

6. **Date and time:** 01/05/2021; 01:33 p.m.

Name: Erik Anderson - Chair

Phone #: (727) 417-5417

Summary: Called Mr. Anderson, an automated voice message was reached. I identified who I was, who I am with and that I was following up on our conversation on December 15, 2020. Informed Mr. Anderson his affidavit has not been received at the time of this call. I asked that Mr. Anderson return my call at his earliest convenience at (850) 329-0645, which is my direct number.

Memo to File? No

Entered by: CM

7. **Date and time:** 01/25/2021; 03:37 p.m.

Name: Erik Anderson - Chair

Phone #: (727) 417-5417

Summary: Called Mr. Anderson, an automated voice message was reached. I identified who I was, who I am with and that I was following up on his submitted affidavit. I asked that Mr. Anderson return my call at his earliest convenience at (850) 922-4539 or (850) 329-0645.

Memo to File? No

Entered by: CM

8. **Date and time:** 01/26/2021; 10:21 p.m.

Name: Erik Anderson - Chair

Phone #: (727) 417-5417

Summary: Spoke with Mr. Anderson to review the referral and questionnaire-affidavit for FEC 20-156 with him. He stated that during the transition of the change of officers, report reminders were going to the wrong person. He also stated after William Roberts became the primary treasure all reports were caught up.

I explained our process that I would complete a ROI, he'll have an opportunity to provide a written response, legal staff will provide a SR, and he may respond in writing; all will be presented to the Commission at a meeting in Tallahassee.

I mentioned he may wish to enter into negotiations with our legal staff directed towards settlement. He wanted to wait until the SR was provided.

Memo to File? No

Entered by: CM



FLORIDA DEPARTMENT *of* STATE

RON DESANTIS
Governor

LAUREL M. LEE
Secretary of State

January 27, 2021

William M. Roberts, Registered Agent
Commercial Real Estate PAC (60777)
14711 Clarendon Drive
Tampa, Florida 33624

RE: INITIAL NOTICE OF INTENT TO CANCEL REGISTRATION

Dear Mr. Roberts:

This Initial Notice of Intent to Cancel Registration of your political committee is based on the following pursuant to Section 106.03(7), Florida Statutes, and Rule 1S-2.021, Florida Administrative Code:

- **The committee had limited financial activity during the 2019 and 2020 calendar years.**

If you object to this cancellation, you have 30 days from the date of this notice to provide documentation showing why the committee's registration should not be canceled. Alternatively, you may choose to voluntarily terminate your committee's registration before the end of the 30 days.

All further notices regarding cancellation of this committee's registration will be sent only to the registered agent's most recent address on file.

If you have any questions, please call (850) 245-6280.

Sincerely,

A handwritten signature in black ink that reads "Kristi Reid Willis".

Kristi Reid Willis, Chief
Bureau of Election Records

KRW/stb

Enclosure

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 ELECTIONS COMMISSION
PHONE LOG
Case No.: FEC 20-156**

Respondent: Commercial Real Estate PAC

Complainant: Division

1. **Date and time:** 09/17/2020; 01:59 p.m.
Name: Wells Fargo Summons and Subpoenas Department
Phone #: (480) 724-2000
Summary: I called Wells Fargo Summons and Subpoenas Department to speak to Santina Moore about their response dated September 1, 2020. I spoke with Kyle who assisted me due to Santina Moore being in another state. Kyle requested I provide the copy of the fine payment check associated with the Wells Fargo account associated with Commercial Real Estate PAC to email: subpoenafax@wellsfargo.com. Kyle stated he would include a memo to this subpoena request that this information was being submitted.
Memo to File? No
Entered by: CM

2. **Date and time:** 11/17/2020; 03:15 p.m.
Name: Erik Anderson - Chair
Phone #: (727) 939-4227
Summary: Called (727) 939-4227 and spoke with Sue Fern, Executive Director, Florida Gulfcoast Commercial Association of Realtors. She provided a contact number of (727) 822-4715 for Erik Anderson, Chair for Commercial Real Estate PAC.
Memo to File? No
Entered by: CM

3. **Date and time:** 11/17/2020; 04:17 p.m.
Name: Erik Anderson - Chair
Phone #: (727) 822-4715
Summary: Called and spoke with a receptionist who forwarded me to Mr. Anderson. An automated voice message was reached. I identified who I was and who I am with. I asked that Mr. Anderson return my call at his earliest convenience at (850) 922-4539.
Memo to File? No
Entered by: CM

4. **Date and time:** 11/17/2020; 04:58 p.m.
Name: Erik Anderson - Chair
Phone #: (727) 417-5417
Summary: Called and spoke with Mr. Anderson after he left message to call back at (727) 417-5417. I informed him I was working on FEC 20-156. I asked if he had received the cover letter and affidavit mailed to him at 5123 Kerwood Court, Palm Harbor, Florida 34685

and he said he does not know of that address. He requested I send the cover letter and affidavit again to erik@cprteam.com. I told him I would send it on November 18, 2020.

Memo to File? No

Entered by: CM

5. **Date and time:** 12/15/2020; 10:19 a.m.

Name: Erik Anderson - Chair

Phone #: (727) 417-5417

Summary: Spoke with Mr. Anderson to follow-up on affidavit FEC 20-156 sent to him on November 18, 2020. He apologized for the delay in returning affidavit. He said he provided it to his attorney, who did not return it, and then he forgot about it due to the holidays. He stated he would immediately contact his attorney and try to get the affidavit completed and submitted by next week.

Memo to File? No

Entered by: CM

6. **Date and time:** 01/05/2021; 01:33 p.m.

Name: Erik Anderson - Chair

Phone #: (727) 417-5417

Summary: Called Mr. Anderson, an automated voice message was reached. I identified who I was, who I am with and that I was following up on our conversation on December 15, 2020. Informed Mr. Anderson his affidavit has not been received at the time of this call. I asked that Mr. Anderson return my call at his earliest convenience at (850) 329-0645, which is my direct number.

Memo to File? No

Entered by: CM

7. **Date and time:** 01/25/2021; 03:37 p.m.

Name: Erik Anderson - Chair

Phone #: (727) 417-5417

Summary: Called Mr. Anderson, an automated voice message was reached. I identified who I was, who I am with and that I was following up on his submitted affidavit. I asked that Mr. Anderson return my call at his earliest convenience at (850) 922-4539 or (850) 329-0645.

Memo to File? No

Entered by: CM

8. **Date and time:** 01/26/2021; 10:21 p.m.

Name: Erik Anderson - Chair

Phone #: (727) 417-5417

Summary: Spoke with Mr. Anderson to review the referral and questionnaire-affidavit for FEC 20-156 with him. He stated that during the transition of the change of officers, report reminders were going to the wrong person. He also stated after William Roberts became the primary treasure all reports were caught up.

I explained our process that I would complete a ROI, he'll have an opportunity to provide a written response, legal staff will provide a SR, and he may respond in writing; all will be presented to the Commission at a meeting in Tallahassee.

I mentioned he may wish to enter into negotiations with our legal staff directed towards settlement. He wanted to wait until the SR was provided.

Memo to File? No

Entered by: CM

Re: [EXTERNAL] FEC 20-156 - Cover Letter and Affidavit

Charles Mellow <Charles.Mellow@myfloridalegal.com>

Wed 1/13/2021 2:53 PM

To: Anderson, Erik <eanderson@commercialpartnersrealty.com>**Mr. Anderson:**

This is confirmation that I have received your affidavit.

Regards,

Charles Mellow - Investigator
Florida Elections Commission - Office of the Attorney General
Collins Building - Room 212
107 W. Gaines Street
Tallahassee, FL 32399-1050
Phone: (850) 922-4539
Charles.Mellow@myfloridalegal.com



From: Anderson, Erik <eanderson@commercialpartnersrealty.com>
Sent: Wednesday, January 13, 2021 2:01 PM
To: Charles Mellow <Charles.Mellow@myfloridalegal.com>
Subject: RE: [EXTERNAL] FEC 20-156 - Cover Letter and Affidavit

Hi Charles,

I apologize for taking so long to get the attached affidavit back to you. Please feel free to contact me if you have any questions.

Thank you,

Erik Anderson, CCIM
Office/Industrial Specialist
Commercial Partners Realty, Inc.
299 Martin Luther King Jr St N
St Petersburg, Florida 33701
Phone: 727-822-4715 ext 1282
Direct(727) 503-6864
Cell:(727) 417-5417
www.commercialpartnersrealty.com
www.cprteam.com

PRIVACY/CONFIDENTIALITY NOTICE:

This message contains private, confidential, or legally privileged information and is intended for the recipient ONLY. If you are not the intended recipient or have received this e-mail in error, please notify info@commercialpartnersrealty.com immediately by return e-mail or phone and delete all copies of this e-mail, including all attachments without reading them or saving to any storage device. If you are the intended recipient(s) you will need to secure the

contents conforming to all applicable state and/or federal requirements relating to the privacy and confidentiality of such information. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender and Commercial Partners Realty, Inc. therefore do not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version.

From: Charles Mellow [mailto:Charles.Mellow@myfloridalegal.com]

Sent: Wednesday, November 18, 2020 8:50 AM

To: Anderson, Erik

Subject: [EXTERNAL] FEC 20-156 - Cover Letter and Affidavit

Erik Anderson:

Please read the attached cover letter and complete the affidavit. The Florida Elections Commission (FEC) needs additional information pertaining to case FEC 20-156.

Thank you,

Charles Mellow - Investigator
Florida Elections Commission - Office of the Attorney General
Collins Building - Room 212
107 W. Gaines Street
Tallahassee, FL 32399
Phone: (850) 922-4539
Charles.Mellow@myfloridalegal.com





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



November 18, 2020

Erik Anderson, Chair
Commercial Real Estate PAC
5123 Kernwood Court
Palm Harbor, Florida 34685

RE: Case No.: FEC 20-156; Email: erik@cprteam.com

Dear Mr. Anderson:

The Florida Elections Commission needs additional information concerning the complaint filed against Commercial Real Estate PAC with the Commission. Therefore, please complete the enclosed questionnaire, have it notarized, and return it to me by December 2, 2020.

Section 106.26, Florida Statutes, provides the Commission with the power to subpoena witnesses and documents. However, your cooperation in responding to these questions will eliminate the need to subpoena you for deposition at this time.

Thank you for your cooperation in this matter. Please let me know if you have any questions. I may be reached by e-mail at charles.mellow@myfloridalegal.com.

Sincerely,

A handwritten signature in cursive script that reads "Charles Mellow".

Charles Mellow
Investigation Specialist

Enclosure: Affidavit of Additional Information

AFFIDAVIT OF BACKGROUND INFORMATION
Case Number: FEC 20-156

STATE OF FLORIDA
County of Pinellas

Erik Anderson, being duly sworn, says:

1. This affidavit is made upon my personal knowledge.
2. I am of legal age and competent to testify to the matters stated herein. I am currently employed by Commercial Partners Realty, Inc. RE Agent.
3. Have you ever run for public office? If so, please name the office(s) you ran for and the date(s) of the election(s) you ran in.

No

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

No

5. Have you ever held the office of chairperson, treasurer, board member, or other similar position for a political committee? If so, please list the names and addresses of the committees and dates when you held the position.

No

6. Have you ever prepared or signed a campaign treasurer's report? If so, please list the name of the candidate or committee whose report you prepared or signed.

No

7. What action have you taken to determine your responsibilities under Florida's election laws?

I am Chairman of the CRE PAC

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

9. If so, when did you first obtain it?

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

11. Do you possess a copy of the *Political Committee Handbook*? Yes No

12. If so, when did you first obtain it?

13. Have you read the *Political Committee Handbook*? Yes No

14. Do you possess a copy of the *Political Committee EFS User's Guide*? Yes No

15. If so, when did you first obtain it?

16. Have you read the *Political Committee EFS User's Guide*? Yes No

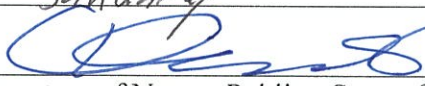
17. For each of the following reporting periods, please explain the reason why you either failed to timely file a campaign treasurer's report for Commercial Real Estate PAC disclosing all information required by Chapter 106, Florida Statutes, or failed to timely notify the filing officer on the prescribed reporting date that no report would be filed on that date because the political committee had not received funds, made contributions, or expended reportable funds: 2020 M3 and 2020 M4.

The CRE PAC changed officers and there was
a miscommunication between the State
and the CRE PAC Treasurer

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 11 day of
January, 2021.


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



Tyhira Walters
Comm. #HH053387
Expires: Oct. 14, 2024
Bonded Thru Aaron Notary

Personally Known or Produced Identification

Type of Identification Produced: _____

Case Investigator: CM



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



July 27, 2020

Erik Anderson, Chair
Commercial Real Estate PAC
5123 Kernwood Court
Palm Harbor, FL 34685

RE: Case No.: FEC 20-156; Respondent: Commercial Real Estate PAC

Dear Mr. Anderson:

On June 29, 2020, the Florida Elections Commission received a complaint alleging that your committee violated Florida's election laws. I have reviewed the complaint and find that it contains one or more **legally sufficient allegations**. The Commission staff will investigate the following alleged violations:

Section 106.07(7), Florida Statutes: As alleged in the complaint, Respondent, a political committee registered with the Division of Elections, 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 following periods:

- 2020 M3
- 2020 M4

Section 106.19(1)(c), Florida Statutes: As alleged in the complaint, Respondent, a political committee registered with the Division of Elections, may have falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, during the following periods:

- 2020 M3
- 2020 M4

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

Commercial Real Estate PAC
July 27, 2020
Page 2
FEC 20-156

and present a written Staff Recommendation (SR) to the Commission as to whether there is probable cause to charge 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 your committee. 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 **Charles 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/med

DIVISION OF ELECTIONS FEC NOTICE FORM

To FEC from Division of Elections

Name: Commercial Real Estate PAC
Account Number: 60777
Chairperson: Erik Anderson
Treasurer: Steven G. Klein
Registered Agent: David Fern

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 the failure to file a report after notice or failure to file a notification to the filing officer in writing that no report was being filed on the prescribed reporting date as required by section 106.07(7), Florida Statutes.

The following reports are outstanding after notification:

2020 M3

2020 M4

- Commercial Real Estate PAC (60777) is a political committee registered with the Division of Elections. On August 7, 2013, William M. Roberts filed the DSDE 5 and DSDE 6 with the Division indicating that he was the chairperson.
- On August 9, 2016, Erik Anderson was appointed chairperson.
- The 2020 M3 campaign treasurer's report was due on April 10, 2020. On April 13, 2020, the Division mailed Commercial Real Estate PAC notification that the 2020 M3 campaign treasurer's report had not been filed.
- On April 28, 2020, the Division mailed Commercial Real Estate PAC notification that the 2020 M3 campaign treasurer's report had not been filed.

- On May 12, 2020, the Division mailed Commercial Real Estate PAC final notification with delivery confirmation that the 2020 M3 report had not been filed. (See attached letter and delivery confirmation.)
- The 2020 M4 campaign treasurer's report was due on May 11, 2020. On May 12, 2020, the Division mailed Commercial Real Estate PAC notification that the 2020 M4 campaign treasurer's report had not been filed.
- On May 26, 2020, the Division mailed Commercial Real Estate PAC notification that the 2020 M4 campaign treasurer's report had not been filed.
- On June 11, 2020, the Division mailed Commercial Real Estate PAC final notification with delivery confirmation that the 2020 M4 report had not been filed. (See attached letter and delivery confirmation.)
- The committee did not notify the Division of Elections prior to or on the prescribed reporting dates for the 2020 M3 and 2020 M4 reports that no reports were to be filed.
- As of June 24, 2020, Commercial Real Estate PAC has not filed the 2020 M3 and 2020 M4 reports.

Sent By: Kristi Reid Willis

Date: June 24, 2020

KRW

dlh



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

Final Notice

Delivery Confirmation:

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& CUSTOMER
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9114 9023 0722 4421 3818 10
For Tracking or Inquiries go to USPS.com
or call 1-800-222-1811

May 12, 2020

Erik Anderson, Chairperson
Commercial Real Estate PAC
5123 Kernwood Court
Palm Harbor, FL 34685-4685

PAC 60777

Dear Mr. Anderson:

A recent review of the Division's records show that the Division has not yet received the below-referenced campaign treasurer's report or the required notification that no reportable activity occurred, whichever is applicable, during the following cover period:

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2020	M3	3/1/20 - 3/31/20

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

As we stated in the prior notices, even if you now file the report or notification, the untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Kristi Reid Willis, Chief
Bureau of Election Records

cc: Steven G. Klein, Treasurer

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FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

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or call 1-800-222-1811.

June 11, 2020

Erik Anderson, Chairperson
Commercial Real Estate PAC
5123 Kernwood Court
Palm Harbor, FL 34685-4685

PAC 60777

Dear Mr. Anderson:

A recent review of the Division's records show that the Division has not yet received the below-referenced campaign treasurer's report or the required notification that no reportable activity occurred, whichever is applicable, during the following cover period:

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2020	M4	4/1/20 - 4/30/20

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

As we stated in the prior notices, even if you now file the report or notification, the untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Kristi Reid Willis, Chief
Bureau of Election Records

cc: Steven G. Klein, Treasurer

ALERT: DUE TO LIMITED TRANSPORTATION AVAILABILITY AS A RESULT OF NATIO...

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Your item was delivered in or at the mailbox at 2:35 pm on June 15, 2020 in PALM HARBOR, FL 34685.

Feedback

Delivered

June 15, 2020 at 2:35 pm
Delivered, In/At Mailbox
PALM HARBOR, FL 34685

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