

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**In Re: Kelley Howell**

**Case No.: FEC 17-447**

**TO:** Kelley Howell  
20403 Port Bishop Lane  
Richmond, TX 77407-7407

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

**NOTICE OF HEARING (INFORMAL HEARING)**

A hearing will be held in this case before the Florida Elections Commission on, **August 14, 2018 at 9:00 am, or as soon thereafter as the parties can be heard**, at the following location: **First District Court of Appeal, 2000 Drayton Drive, Tallahassee, Florida 32399**. Due to heightened security access requirements, please bring only essential items into the building and plan to arrive early to allow for delays coming through security.

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

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

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

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

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

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

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

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

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

*Amy McKeever Toman*  
Executive Director  
Florida Elections Commission  
July 30, 2018

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

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

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

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

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

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

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

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STATE OF FLORIDA  
ELECTIONS COMMISSION

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**Florida Elections Commission,  
Petitioner,**

**Case No.: FEC 17-447**

**v.**

**Kelley Howell,  
Respondent.**

**ORDER OF PROBABLE CAUSE**

**THIS MATTER** was heard by the Florida Elections Commission (Commission) at its regularly scheduled meeting on May 15, 2018, in Tallahassee, Florida.

On April 10, 2018, Staff recommended to the Commission that there was probable cause to believe that the Florida Election Code was violated. The facts articulated in Staff's Recommendation are adopted by reference and incorporated herein. Based on the Complaint, Report of Investigation, Staff's Recommendation, and oral statements (if any) made at the probable cause hearing, the Commission finds that there is **probable cause** to charge Respondent with the following violation(s):

**Count 1:**

On or about September 23, 2016, Kelley Howell violated Section 106.07(7), Florida Statutes, when she failed to notify the filing officer in writing on the prescribed reporting date that she would not be filing her 2016 G2 Report.

**Count 2:**

On or about October 7, 2016, Kelley Howell violated Section 106.07(7), Florida Statutes, when she failed to notify the filing

officer in writing on the prescribed reporting date that she would not be filing her 2016 G3 Report.

**Count 3:**

On or about October 21, 2016, Kelley Howell violated Section 106.07(7), Florida Statutes, when she failed to notify the filing officer in writing on the prescribed reporting date that she would not be filing her 2016 G5 Report.

**Count 4:**

On or about October 28, 2016, Kelley Howell violated Section 106.07(7), Florida Statutes, when she failed to notify the filing officer in writing on the prescribed reporting date that she would not be filing her 2016 G6 Report.

**Count 5:**

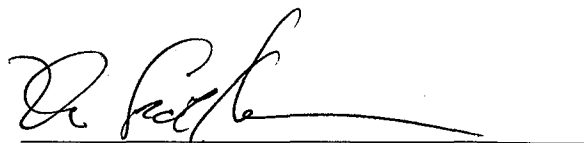
On or about November 4, 2016, Kelley Howell violated Section 106.07(7), Florida Statutes, when she failed to notify the filing officer in writing on the prescribed reporting date that she would not be filing her 2016 G7 Report.

**Count 6:**

On or about February 6, 2017, Kelley Howell violated Section 106.07(7), Florida Statutes, when she failed to notify the filing officer in writing on the prescribed reporting date that she would not be filing her 2016 Termination Report.

The Commission finds that there is **no probable cause** to charge Respondent with violating Section 106.19(1)(c), Florida Statutes.

**DONE AND ORDERED** by the Florida Elections Commission on May 15, 2018.



M. Scott Thomas, Chairman  
Florida Elections Commission

Copies furnished to:  
Stephanie J. Cunningham, Assistant General Counsel  
Kelley Howell, Respondent

**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: Kelley Howell**

**Case No.: FEC 17-447**

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**TO:** Kelley Howell  
20403 Port Bishop Lane  
Richmond, TX 77407-7407

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

**NOTICE OF HEARING (PROBABLE CAUSE DETERMINATION)**

A hearing will be held in this case before the Florida Elections Commission on, **May 15, 2018 at 9:30 am, or as soon thereafter as the parties can be heard**, at the following location: **412 Knott Building, Pat Thomas Committee Room, 404 South Monroe Street, Tallahassee, Florida 32399.**

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

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*Amy McKeever Toman*  
Executive Director  
Florida Elections Commission  
April 30, 2018

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

STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION

In Re: **Kelley Howell**

Case No.: **FEC 17-447**

**STAFF RECOMMENDATION FOLLOWING INVESTIGATION**

Pursuant to Section 106.25(4)(c), Florida Statutes, undersigned staff counsel files this written recommendation for disposition of the referral in this case recommending that there is **probable cause** to charge Respondent with violating **Section 106.07(7), Florida Statutes**, and that there is **no probable cause** to charge Respondent with violating **Section 106.19(1)(c), Florida Statutes**. Based upon a thorough review of the Report of Investigation submitted on March 21, 2018, the following facts and law support this staff recommendation:

1. On December 7, 2017, the Florida Elections Commission ("Commission") received a referral from the Department of State, Division of Elections ("Division"), alleging that Kelley Howell ("Respondent") violated Chapter 106, Florida Statutes.
2. Respondent was a 2016 candidate for State Representative, District 91. (ROI Exhibit 10)<sup>1</sup>
3. By letter dated February 27, 2018, the Executive Director notified Respondent that Commission staff would investigate the following statutory provisions:

**Section 106.07(7), Florida Statutes:** As alleged in the complaint, Respondent may have failed to notify the filing officer on the prescribed reporting date that no report would be filed on that date because she had not received funds, made contributions, or expended reportable funds during the following reporting periods:

- 2016 G2
- 2016 G3
- 2016 G5
- 2016 G6
- 2016 G7
- 2016 TR

**Section 106.19(1)(c), Florida Statutes:** As alleged in the complaint, Respondent may have falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, when she failed to file a report on the prescribed reporting date for the following reporting periods:

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<sup>1</sup> The Report of Investigation is referred to herein as "ROI."



- 2016 G2
- 2016 G3
- 2016 G5
- 2016 G6
- 2016 G7
- 2016 TR

4. By letter dated June 22, 2016, Kristi Reid Bronson, Chief, Bureau of Election Records, sent Respondent a letter acknowledging that the Division had received her Appointment of Campaign Treasurer and Designation of Campaign Depository for Candidates form and that her name was placed on the 2016 active candidate list. (ROI Exhibit 2, page 1)

5. The acknowledgment letter advised Respondent that all candidates filing reports with the Division are required to use the electronic filing system ("EFS"), and provided Respondent with a user identification number and initial password to grant access to the EFS. (ROI Exhibit 2, page 1) The letter further advised Respondent that all of the Division's publications and reporting forms were available on its website and directed Respondent to print out the *Calendar of Reporting Dates* as well as other relevant documents. (ROI Exhibit 2, page 3)

6. Respondent's 2016 G2, 2016 G3, 2016 G5, 2016 G6, 2016 G7, and 2016 Termination reports were due to be filed by September 23, 2016, October 7, 2016, October 21, 2016, October 28, 2016, November 4, 2016, and February 6, 2017, respectively; however, Respondent failed to timely file the reports or notify the filing officer that no reports would be filed. (ROI Exhibit 3) The Division sent multiple letters notifying Respondent that her reports had not been received. The letters also notified Respondent that she was still required to notify the Division if she had no reportable financial activity. (ROI Exhibits 4-6)

7. A subpoena was issued to Respondent's designated campaign depository to ascertain whether any financial activity occurred during the relevant reporting periods, i.e., collectively September 3, 2016 – September 30, 2016, and October 8, 2016 – February 6, 2017. The financial institution had no record of an account in Respondent's name. (ROI Exhibit 7)

8. Respondent was given multiple opportunities to respond to Commission staff's investigation, but failed to do so. (ROI, p. 4, ¶ 21)

9. As it appears that Respondent had no financial activity, Respondent was required to notify the filing officer in writing that she would not be filing her 2016 G2, 2016 G3, 2016 G5, 2016 G6, 2016 G7, and 2016 Termination reports on the prescribed reporting dates, but failed to do so. Therewith, it does not appear that Respondent falsely reported or deliberately failed to include information in her 2016 G2, 2016 G3, 2016 G5, 2016 G6, 2016 G7, and 2016 Termination reports as the reports were waived due to a lack of reportable financial activity.

10. As of March 20, 2018, Respondent had not filed her reports or notified the filing officer that no reports would be filed. (ROI Exhibit 9, page 1) Further, the Division's Filing

History shows that Respondent had knowledge of how to notify the Division of a lack of reportable financial activity, but failed to do so for the above-referenced reporting periods. (ROI Exhibit 9, page 2)

11. "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).

12. The facts set forth above show that Respondent was a 2016 candidate for State Representative, District 91. Respondent failed to timely file her 2016 G2, 2016 G3, 2016 G5, 2016 G6, 2016 G7, and 2016 Termination reports or notify the filing officer that no reports would be filed. It appears that Respondent had no financial activity during the relevant reporting periods, and therefore, was required to notify the filing officer in writing that she would not be filing her reports on the prescribed reporting dates, but failed to do so. Therewith, it does not appear that Respondent falsely reported or deliberately failed to include information in her reports as the reports were waived due to a lack of reportable financial activity.

Based upon these facts and circumstances, I recommend that the Commission find **no probable cause** to charge Respondent with violating **Section 106.19(1)(c), Florida Statutes**, and find **probable cause** to charge Respondent with violating the following:

**Count 1:**

On or about September 23, 2016, Kelley Howell violated Section 106.07(7), Florida Statutes, when she failed to notify the filing officer in writing on the prescribed reporting date that she would not be filing her 2016 G2 Report.

**Count 2:**

On or about October 7, 2016, Kelley Howell violated Section 106.07(7), Florida Statutes, when she failed to notify the filing officer in writing on the prescribed reporting date that she would not be filing her 2016 G3 Report.

**Count 3:**

On or about October 21, 2016, Kelley Howell violated Section 106.07(7), Florida Statutes, when she failed to notify the filing officer in writing on the prescribed reporting date that she would not be filing her 2016 G5 Report.

**Count 4:**

On or about October 28, 2016, Kelley Howell violated Section 106.07(7), Florida Statutes, when she failed to notify the filing officer in writing on the prescribed reporting date that she would not be filing her 2016 G6 Report.

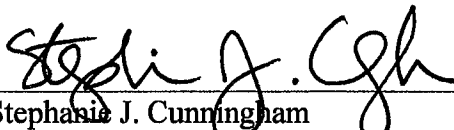
**Count 5:**

On or about November 4, 2016, Kelley Howell violated Section 106.07(7), Florida Statutes, when she failed to notify the filing officer in writing on the prescribed reporting date that she would not be filing her 2016 G7 Report.

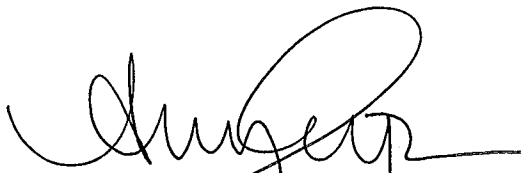
**Count 6:**

On or about February 6, 2017, Kelley Howell violated Section 106.07(7), Florida Statutes, when she failed to notify the filing officer in writing on the prescribed reporting date that she would not be filing her 2016 Termination Report.

Respectfully submitted on April 10, 2018.

  
\_\_\_\_\_  
Stephanie J. Cunningham  
Assistant General Counsel

I reviewed this Staff Recommendation this 10th day of April 2018.

  
\_\_\_\_\_  
Amy McKeever Toman  
Executive Director

**FLORIDA ELECTIONS COMMISSION**  
**REPORT OF INVESTIGATION**  
Case No.: FEC 17-447

**Respondent: Kelley Lynn Howell**

Counsel for Respondent: n/a

**Complainant: Division of Elections**

Counsel for Complainant: n/a

Pursuant to Section 106.25, Florida Statutes, on December 7, 2017, the Florida Elections Commission received information from the Division of Elections that Respondent violated Chapter 106, Florida Statutes. The Division's referral was mandated pursuant to Section 106.22(7), Florida Statutes. Commission staff, therefore, investigated whether Respondent violated the following statutes:

Section 106.07(7), Florida Statutes, failure of a candidate who 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; and

Section 106.19(1)(c), Florida Statutes, prohibiting a person or organization from falsely reporting or deliberately failing to report information required by Chapter 106, Florida Statutes.

**I. Preliminary Information:**

1. Respondent was a candidate for the office of State Representative, District 91 in the 2016 general election. Respondent was defeated in the election.

2. Complainant is the Division of Elections.

3. Respondent's filing officer is Kristi Willis, Chief, Bureau of Election Records<sup>1</sup>.

4. On June 22, 2016, Respondent filed her original Appointment of Campaign Depository and Designation of Campaign Depository (DS-DE 9) with her filing officer. Respondent appointed herself as her own campaign treasurer. To view a copy of Respondent's DS-DE 9 form, refer to exhibit 1.

5. On June 22, 2016, Ms. Bronson sent Respondent a letter acknowledging she had been placed on the 2016 active candidate list. The letter advised Respondent that all candidates filing reports with the Division are required to use the electronic filing system (EFS). Respondent was provided with a user identification number and initial password allowing her access to the EFS. To view a copy of the June 22, 2016 acknowledgement letter, refer to exhibit 2.

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<sup>1</sup> Kristi Reid-Bronson recently got married and has since changed her name to Kristi Willis.

6. On December 5, 2017, a DOE staff representative, Kristi Willis, completed a sworn affidavit alleging that Respondent failed to report campaign activity, or in the alternative failed to notify the filing officer that no report would be filed for the following reporting periods: 2016 G2; 2016 G3; 2016 G5; 2016 G6; 2016 G7; and the 2016 Termination Report (TR). To view a copy of the December 5, 2017 sworn-affidavit from Complainant, refer to exhibit 3.

7. Table 1 reflects the history of the failure-to-file notices that were sent to Respondent regarding her campaign reports. Exhibit 4.

<b>Table 1: Failure-to-File Notices History</b>					
<b>Report</b>	<b>Cover Period</b>	<b>Due Date</b>	<b>1<sup>st</sup> Failure-to-File Notice Sent</b>	<b>2<sup>nd</sup> Failure-to-File Notice Sent</b>	<b>Final Failure-to-File Notice Sent</b>
2016 G2	9/3/16-9/16/16	9/23/16	9/26/16*	10/11/16*	11/3/16*
2016 G3	9/17/16-9/30/16	10/7/16	10/10/16*	10/17/16*	11/3/16*
2016 G5	10/8/16-10/14/16	10/21/16	10/24/16*	N/A	11/3/16*
2016 G6	10/15/16-10/21/16	10/28/16	11/1/16*	N/A	11/3/16*
2016 G7	10/22/16-11/3/16	11/4/16	11/7/16*	N/A	11/15/17
2016 TR	11/4/16-2/6/17	2/6/17	N/A	N/A	11/15/17

\*-Dates with this symbol reflect that these notices were not able to be delivered. They were returned as, "Return to Sender/Not deliverable as addressed/unable to forward". Exhibit 5.

8. On November 15, 2017, Complainant re-mailed the returned undeliverable final failure-to-file notices via certified mail. The delivery receipt details that the notices were delivered on November 21, 2017 at 5:23 pm. To view copies of the redelivered final failure-to-file notices that were sent via certified mail on November 15, 2017, refer to exhibit 6.

9. The allegations that Respondent failed to report campaign activity, or in the alternative, failed to notify the filing officer in writing, that no report would be filed for the following periods: 2016 G2; 2016 G3; 2016 G5; 2016 G6; 2016 G7; and the 2016 TR reporting periods will be discussed in the following paragraphs.

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

10. I investigated whether Respondent violated this section of the election laws by falsely reporting or deliberately failing to include information required by Chapter 106, Florida Statutes, when she failed to file a treasurer's report, or written notice to the filing officer that no report would be filed due to lack of reportable activity during the 2016 G2; 2016 G3; 2016 G5; 2016 G6; 2016 G7' and the 2016 TR reporting periods, on the prescribed reporting dates.

11. On June 1, 2017, I subpoenaed Respondent's campaign account records from Wells Fargo, the campaign depository listed on Respondent's current DS-DE 9 form (Exhibit 1). In a business records declaration page dated June 8, 2017, Ms. Dawn Ward, Subpoena Operations Manager,

stated that she was unable to locate any information on Respondent. To view a copy of the June 8, 2017 "business records declaration" from Respondent's depository, refer to exhibit 7.

12. Based upon Wells Fargo's declaration in response to the Commission's subpoena, it appears that Respondent did not have any contributions or expenditures to report during any of the reporting periods discussed in Table 1. Therefore, it appears that there was no campaign activity for Respondent to disclose during these periods.

13. There is no record that Respondent has previously violated this section of the election laws.

### **III. Alleged Violation of Section 106.07(7), Florida Statutes:**

14. I investigated whether Respondent violated this section of the election laws by failing to timely notify the filing officer, in writing, that no report would be filed due to not receiving any contributions or making any expenditures during the above-mentioned reporting periods.

15. To review the circumstances regarding Respondent's campaign activity, refer to paragraphs 11 and 12 of this report.

16. Section 106.07(7), Florida Statutes, states in part:

"Notwithstanding any other provisions of this chapter, in any reporting period during which a candidate or political committee has not received funds, made any contributions, or expended any reportable funds, the filing of the required report for that period is waived...any candidate or political committee not reporting by virtue of this subsection on dates prescribed elsewhere in this chapter shall notify the filing officer in writing on the prescribed reporting date that no report is being filed on that date."

17. In an email dated April 2, 2014, Ms. Bronson was asked to clarify the procedure regarding how to notify the Division in writing on the prescribed reporting date that no report would be filed. In her response, Ms. Bronson stated, "The notice that no report will be filed is the waiver, which must be filed in the EFS. We do not require anything separate in writing." To view a copy of the April 2, 2014 email, refer to exhibit 8.

18. Based upon Wells Fargo's declaration and Ms. Bronson's email, because Respondent did not have any contributions or expenditures during the reporting periods detailed in Table 1, it appears Respondent was required to notify the Division in writing on the prescribed reporting dates that no reports would be filed. As of the date of this report, there is no record that Respondent has filed any of the previously mentioned reports, nor advised in writing of no reportable activity to disclose. To view a copy of Respondent's filing history, refer to exhibit 9.

19. There is a record that Respondent has previously violated this section of the election laws.

### **IV. FEC History:**

20. Respondent has appeared before the Commission on one prior occasion. In FEC 16-

551: a final order was signed on November 28, 2017; the commission found a violation of section 106.07(7), Florida Statutes, and imposed a fine of \$500.00. As of the date of this report, the fine has not been paid.

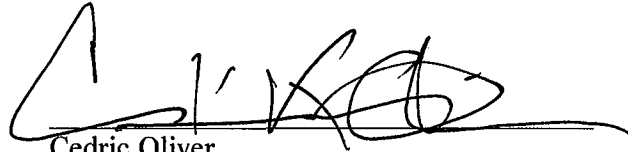
**Conclusion:**

21. Respondent was offered several opportunities to make comments regarding the findings of this investigation. Respondent has not responded to any of these attempts to discuss this matter.

22. In the June 22, 2016 acknowledgement letter, Respondent was informed that all of the Division's publications are available online at the DOE's website. In the letter, Respondent was admonished as follows: 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: Chapters 104 and 106, Florida Statutes, Candidate and Campaign Treasurer Handbook, Calendar of Reporting Dates, and Rule 1S-2.017, Florida Administrative Code". To view a copy of the June 22, 2016 acknowledgement letter, refer to exhibit 2.

23. On June 22, 2016, Respondent filed her Statement of Candidate for the office of State House, District 91 acknowledging that she had been provided access to read and understand the requirements of Chapter 106, Florida Statutes. To view a copy of the Statement of Candidate, refer to exhibit 10.

Respectfully submitted on March 21, 2018.



Cedric Oliver  
Investigation Specialist

**Current address of Respondent**

Ms. Kelley Lynn Howell  
20403 Port Bishop Lane  
Richmond, Texas 77407-6094

**Current address of Complainant**

Division of Elections  
500 South Bronough Street, Room #316  
Tallahassee, Fl 32399

**Name and Address of Filing Officer:**

Ms. Kristi Willis  
Bureau of Election Records Chief  
500 South Bronough Street, Room #316  
Tallahassee, Fl 32399

Copy furnished to: Mr. David Flagg, Investigations Manager

**FLORIDA ELECTIONS COMMISSION**  
**REPORT OF INVESTIGATION**  
**Kelley Howell -- FEC 17-447**

<b>LIST OF EXHIBITS</b>	
<b>Exhibits #s</b>	<b>Description of Exhibits</b>
Exhibit 1	Appointment of Campaign Treasurer and Designation of Campaign Depository
Exhibit 2	June 22, 2016 Acknowledgement Letter
Exhibit 3	Sworn-Affidavit from Kristi Willis
Exhibit 4	Failure-to-File Notices
Exhibit 5	Failure-to-file notices returned undeliverable
Exhibit 6	November 15, 2017 Final Notice re-mailed
Exhibit 7	Declaration page from Wells Fargo, Respondent's depository
Exhibit 8	April 2, 2014 email from DOE
Exhibit 9	Respondent's filing history
Exhibit 10	Statement of Candidate



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

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

(PLEASE PRINT OR TYPE)

RECEIVED  
DEPARTMENT OF STATE

2016 JUN 22 AM 9:38

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

OFFICE USE ONLY

1. CHECK APPROPRIATE BOX(ES):

Initial Filing of Form      Re-filing to Change:  Treasurer/Deputy     Depository     Office     Party

2. Name of Candidate (in this order: First, Middle, Last)

Kelley Lynn Howell

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

1963 Brandywine Rd. 303  
West Palm Beach, FL 33409

4 Telephone

(561) 618-6111

5. E-mail address

Kelley.Howell14@gmail.com

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

State House District 91

7. If a candidate for a nonpartisan office, check if applicable:

My intent is to run as a Write-In candidate.

8. If a candidate for a partisan office, check block and fill in name of party as applicable: My intent is to run as a

Write-In     No Party Affiliation     \_\_\_\_\_ Party candidate.

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

10. Name of Treasurer or Deputy Treasurer

Kelley Lynn Howell

11. Mailing Address

1963 Brandywine Rd 303 West Palm Beach, FL 33409

12. Telephone

(561) 618-6111

13. City

WPB

14. County

Palm Beach

15. State

FL

16. Zip Code

33409

17. E-mail address

Kelley.Howell14@gmail.com

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

19. Name of Bank

Wells Fargo

20. Address

4900 Okeechobee Rd.

21. City

WPB

22. County

Palm Beach

23. State

FL

24. Zip Code

33417

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING FORM FOR APPOINTMENT OF CAMPAIGN TREASURER AND DESIGNATION OF CAMPAIGN DEPOSITORY AND THAT THE FACTS STATED IN IT ARE TRUE.

25. Date

6/21/2016

26. Signature of Candidate

X Kelley L. Howell

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

I, Kelley Lynn Howell, do hereby accept the appointment  
(Please Print or Type Name)

designated above as:  Campaign Treasurer     Deputy Treasurer.

6/21/2016  
Date

X Kelley Lynn Howell  
Signature of Campaign Treasurer or Deputy Treasurer



## FLORIDA DEPARTMENT OF STATE

**RICK SCOTT**  
Governor

**KEN DETZNER**  
Secretary of State

June 22, 2016

Kelley Lynn Howell  
1963 Brandywine Road, 303  
West Palm Beach, Florida 33409

Dear Ms. Howell:

This will acknowledge receipt of the Appointment of Campaign Treasurer and Designation of Campaign Depository for the office of State Representative, which was placed on file in our office on June 22, 2016. Your name has been placed on the 2016 active candidate list.

### Campaign Treasurer's Reports

Your first campaign treasurer's report will be due on **July 1, 2016**. The report will cover the period of June 1-24, 2016 (P1). All candidates who 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 your user identification number. The enclosed sealed envelope contains your initial password. Once you have logged in using the initial password, you will be immediately prompted to change it to a confidential sign-on. You, your campaign treasurer, and deputy treasurers are responsible for protecting these passwords 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:** 67841

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/](http://dos.myflorida.com/elections/)

EXHIBIT 2 (1 of 3)



Kelley Howell  
June 22, 2016  
Page Two

**Pin Numbers**

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

Each candidate is required to provide the Division of Elections with confidential personal information that may be used to allow access in the event that 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 filed 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 of the first business day the EFS becomes operable. No fine will be levied during the period the EFS was inoperable.

Any candidate failing to file a report on the designated due date shall be subject to a fine of \$50 per day for the first 3 days late and, thereafter, \$500 per day for each late day, not to exceed 25% of the total receipts or expenditures, whichever is greater, for the period covered by the late report. However, for reports immediately preceding each primary and general election, the fine shall be \$500 per day for each late 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 candidate and campaign treasurer and such persons are subject to the provisions of Section 106.07(5), Florida Statutes.

EXHIBIT 2 (of 3)

Kelley Howell  
June 22, 2016  
Page Three

**Instructions and Assistance**

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

**All of the Division's publications and reporting forms are available on the Division of Elections' website at <http://dos.myflorida.com/elections/>. It is your responsibility to read, understand, and follow the requirements of Florida's election laws. Therefore, please print a copy of the following documents: Chapters 104 and 106, Florida Statutes, *Candidate and Campaign Treasurer Handbook*, *Calendar of Reporting Dates*, and Rule 1S-2.017, Florida Administrative Code.**

Please let me know if you need additional information.

Sincerely,



Kristi Reid Bronson, Chief  
Bureau of Election Records

KRB/zjs

Enclosures

EXHIBIT 2(3 of 3)

**AFFIDAVIT**

**STATE OF FLORIDA**

**County of Leon**

**Kristi Reid Willis, being duly sworn, says:**

1. I am the Chief of the Bureau of Election Records of the Division of Elections (Division). In that capacity, I oversee the Division's duties related to the filing of campaign finance reports.
2. This affidavit is made upon my personal knowledge, including information obtained from review of the attached records, of which I am the custodian.
3. I am of legal age and competent to testify to the matters stated herein.
4. Kelley Howell (67841) was a 2016 candidate for the office of State Representative.
5. On June 22, 2016, Ms. Howell filed the Appointment of Campaign Treasurer and Designation of Campaign Depository with the Division. She appointed herself as treasurer.
6. The 2016 G2 campaign treasurer's report was due on September 23, 2016. On September 26, 2016, the Division mailed Ms. Howell notification that the 2016 G2 treasurer's report had not been filed.
7. On October 11, 2016, the Division mailed Ms. Howell notification that the 2016 G2 treasurer's report had not been filed.
8. On November 15, 2017, the Division mailed Ms. Howell final notification with delivery confirmation that the 2016 G2 treasurer's report had not been filed. (See attached letter and delivery confirmation.)
9. The 2016 G3 campaign treasurer's report was due on October 7, 2016. On October 10, 2016, the Division mailed Ms. Howell notification that the 2016 G3 treasurer's report had not been filed.
10. On October 17, 2016, the Division mailed Ms. Howell notification that the 2016 G3 treasurer's report had not been filed.
11. On November 15, 2017, the Division mailed Ms. Howell final notification with delivery confirmation that the 2016 G3 treasurer's report had not been filed. (See attached letter and delivery confirmation.)

12. The 2016 G5 campaign treasurer's report was due on October 21, 2016. On November 15, 2017, the Division mailed Ms. Howell final notification with delivery confirmation that the 2016 G5 treasurer's report had not been filed. (See attached letter and delivery confirmation.)
13. The 2016 G6 campaign treasurer's report was due on October 28, 2016. On November 1, 2016, the Division mailed Ms. Howell notification that the 2016 G6 treasurer's report had not been filed.
14. On November 15, 2017, the Division mailed Ms. Howell final notification with delivery confirmation that the 2016 G6 treasurer's report had not been filed. (See attached letter and delivery confirmation.)
15. The 2016 G7 campaign treasurer's report was due on November 4, 2016. On November 15, 2017, the Division mailed Ms. Howell final notification with delivery confirmation that the 2016 G7 treasurer's report had not been filed. (See attached letter and delivery confirmation.)
16. The 2016 TR campaign treasurer's report was due on February 6, 2017. On November 15, 2017, the Division mailed Ms. Howell final notification with delivery confirmation that the 2016 TR treasurer's report had not been filed. (See attached letter and delivery confirmation.)
17. Ms. Howell did not notify the Division of Elections prior to or on the prescribed reporting dates for the 2016 G2, 2016 G3, 2016 G5, 2016 G6, 2016 G7, and 2016 TR reports that no reports were to be filed.

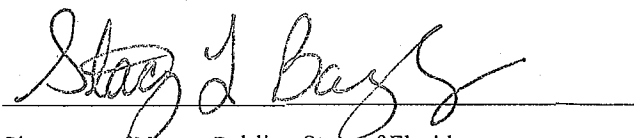
18. As of December 5, 2017, Ms. Howell has not filed the 2016 G2, 2016 G3, 2016 G5, 2016 G6, 2016 G7, and 2016 TR reports.

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



Signature of Affiant

Sworn to (or affirmed) and subscribed before me this **5<sup>th</sup>** day of **December, 2017**.



Signature of Notary Public - State of Florida

Print, Type, or Stamp Commissioned Name of Notary Public

Personally Known





FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

September 26, 2016

Kelley Lynn Howell  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409-3409

CAN 67841

Dear Ms. Howell:

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 September 23, 2016.

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 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 Bronson, Chief  
Bureau of Election Records

EXHIBIT 4 (1 of 11)





FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

**Second Notice**

October 11, 2016

Kelley Lynn Howell  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409-3409

CAN 67841

Dear Ms. Howell:

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 September 23, 2016.

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 September 26, 2016.

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, appearing to read "Kristi Reid Bronson".

Kristi Reid Bronson, Chief  
Bureau of Election Records

EXHIBIT 4 (2 of 11)



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice**  
**Delivery Confirmation:**

USPS TRACKING # **9114 9014 9645 0630 6764 30**  
& CUSTOMER RECEIPT For Tracking or inquiries go to USPS.com  
or call 1-800-222-1811.

November 3, 2016

Kelley Lynn Howell  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409-3409

CAN 67841

Dear Ms. Howell:

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>
2016	G2	9/3/16 - 9/16/16

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 Bronson, Chief  
Bureau of Election Records

EXHIBIT 4(3 of 11)



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice**  
**Delivery Confirmation: 9114 9014 9645 0630 6764 30**

November 3, 2016

Kelley Lynn Howell  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409-3409

CAN 67841

Dear Ms. Howell:

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>
2016	G3	9/17/16 - 9/30/16

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,

Krishi Reid Bronson, Chief  
Bureau of Election Records

EXHIBIT 4 (4 of 11)



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice** - **9114 9014 9645 0630 6764 30** -  
**Delivery Confirmation:**

November 3, 2016

Kelley Lynn Howell  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409-3409

CAN 67841

Dear Ms. Howell:

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>
2016	G5	10/8/16 - 10/14/16

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 Bronson, Chief  
Bureau of Election Records

EXHIBIT 4 (5 of 11)



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

Final Notice - 9114 9014 9645 0630 6764 30 -  
Delivery Confirmation:

November 3, 2016

Kelley Lynn Howell  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409-3409

CAN 67841

Dear Ms. Howell:

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>
2016	G6	10/15/16 - 10/21/16

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 Bronson, Chief  
Bureau of Election Records

EXHIBIT 4 (6 of 11)



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

October 10, 2016

Kelley Lynn Howell  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409-3409

CAN 67841

Dear Ms. Howell:

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 October 7, 2016.

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 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 Bronson, Chief  
Bureau of Election Records

EXHIBIT 4 (7 of 11)



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

**Second Notice**

October 17, 2016

Kelley Lynn Howell  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409-3409

CAN 67841

Dear Ms. Howell:

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 October 7, 2016.

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 October 10, 2016.

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 Bronson, Chief  
Bureau of Election Records

EXHIBIT 4 (8 of 11)



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

October 24, 2016

Kelley Lynn Howell  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409-3409

CAN 67841

Dear Ms. Howell:

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 October 21, 2016.

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 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 Bronson, Chief  
Bureau of Election Records

EXHIBIT 4(9 of 11)





FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

November 1, 2016

Kelley Lynn Howell  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409-3409

CAN 67841

Dear Ms. Howell:

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 October 28, 2016.

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 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 Bronson, Chief  
Bureau of Election Records

EXHIBIT 4 (10 of 11)



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

November 7, 2016

Kelley Lynn Howell  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409-3409

CAN 67841

Dear Ms. Howell:

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 November 4, 2016.

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 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.

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

Sincerely,

Kristi Reid Bronson, Chief  
Bureau of Election Records

EXHIBIT 4 (11 of 11)

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16 NOV -7 AM 11:33

DIVISION OF ELECTIONS  
SECRETARY OF STATE



DEPARTMENT OF STATE  
OF ELECTIONS  
Talley Building  
100 South Street, Rm 316  
Tallahassee, Florida 32399



PRESORT  
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ZIP 32301 \$ 000.41<sup>9</sup>  
02 1W  
0001403894 OCT 12 2016

Kelley Howell  
Candidate for State Representative  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409

NIXIE 333 DE 1270 0011/02/16

RETURN TO SENDER  
INSUFFICIENT ADDRESS  
UNABLE TO FORWARD

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HXH-INE 3320930000

BC: 32399650499 \*1487-01945-25-32

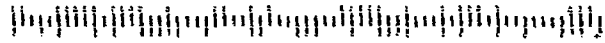


EXHIBIT 5(1 of 17)



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

RECEIVED

16 NOV -7 AM 11:24

DIVISION OF ELECTIONS  
SECRETARY OF STATE

October 10, 2016

Kelley Lynn Howell  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409-3409

CAN 67841

Dear Ms. Howell:

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 October 7, 2016.

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 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.

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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 Bronson, Chief  
Bureau of Election Records

EXHIBIT 5(2 of 17)

RECEIVED

16 NOV -7 AM 11:32

DIV. OF ELECTIONS  
SECRETARY OF STATE



DEPARTMENT OF STATE  
OF ELECTIONS  
COURTNEY Building  
1000 North Street, Rm 316  
Tallahassee, Florida 32399



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ZIP 32301 \$ 000.41<sup>9</sup>  
02 1W  
0001403894 OCT 19 2016

Kelley Howell  
Candidate for State Representative  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409

NIXIE 333 DE 1270 0011/02/16

RETURN TO SENDER  
INSUFFICIENT ADDRESS  
UNABLE TO FORWARD

END  
HYU-IME 23999999  
BC: 32399650499 \*1487-05216-25-32

EXHIBIT 5(30 of 17)



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

RECEIVED  
16 NOV -7 AM 11:32  
DIVISION OF ELECTIONS  
SECRETARY OF STATE

**Second Notice**

October 17, 2016

Kelley Lynn Howell  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409-3409

CAN 67841

Dear Ms. Howell:

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 October 7, 2016.

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 October 10, 2016.

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 Bronson, Chief  
Bureau of Election Records

EXHIBIT 5(4 of 17)

RECEIVED

16 NOV -7 AM 11:09

DIVISION OF ELECTIONS  
SECRETARY OF STATE

JAX FL DEA 54



DEPARTMENT OF STATE  
OF ELECTIONS  
Ray Building  
Cough Street, Rm 316  
Tallahassee, Florida 32399



ADDRESS SERVICE  
REQUESTED

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FIRST CLASS



U.S. POSTAGE PITNEY BOWES



ZIP 32301 \$ 000.41<sup>9</sup>  
02 1W  
0001403894 SEP 27 2016

Kelley Howell  
Candidate for State Representative  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409

NIXIE 333 DE 1270 0011/02/16

RETURN TO SENDER  
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FWD BC: 32399650499 \*1487-01956-25-32

HDN-32399650499

EXHIBIT

5(50A17)

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16 NOV -7 AM 11:09

DIVISION OF ELECTIONS  
SECRETARY OF STATE



DEPARTMENT OF STATE  
DIVISION OF ELECTIONS  
1000 Bay Building  
1000 Bay Street, Rm 316  
Tallahassee, Florida 32399

JAX FL 33409



ADDRESS SERVICE  
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FIRST CLASS



U.S. POSTAGE PITNEY BOWES

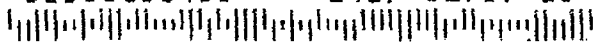


ZIP 32301 \$ 000.41<sup>9</sup>  
02 1W  
0001403894 OCT 13 2016

NIXIE 333 DE 1270 0011/02/16

RETURN TO SENDER  
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UNABLE TO FORWARD

BC: 32399650499 \*1487-01737-25-35



Kelley Howell  
Candidate for State Representative  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409

8 HXH-14310920000



EXHIBIT 5(6 of 17)





FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

**Second Notice**

October 11, 2016

Kelley Lynn Howell  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409-3409

CAN 67841

Dear Ms. Howell:

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 September 23, 2016.

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 September 26, 2016.

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 Bronson, Chief  
Bureau of Election Records

EXHIBIT 5(7 of 17)





FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

November 1, 2016

Kelley Lynn Howell  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409-3409

CAN 67841

Dear Ms. Howell:

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 October 28, 2016.

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 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 Bronson, Chief  
Bureau of Election Records

EXHIBIT 5(9 of 17)



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

September 26, 2016

Kelley Lynn Howell  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409-3409

CAN 67841

Dear Ms. Howell:

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 September 23, 2016.

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 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.

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

Sincerely,

Kristi Reid Bronson, Chief  
Bureau of Election Records

EXHIBIT 5(10 of 17)

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2016 NOV 21 PM 12:26

U.S. DEPARTMENT OF STATE



FLORIDA DEPARTMENT OF STATE  
DIVISION OF ELECTIONS  
R. A. Gray Building  
500 South Bronough Street, Rm 316  
Tallahassee, Florida 32399

TO:

Kelley Howell  
Candidate for State Representative  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409

NIXIE 000005500-1N 11/17/16

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EXHIBIT 5(11 of 17)



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice**  
**Delivery Confirmation:**

USPS TRACKING # **9114 9014 9645 0630 6764 30**  
& CUSTOMER RECEIPT For Tracking or inquiries go to USPS.com  
or call 1-800-222-1811.

November 3, 2016

Kelley Lynn Howell  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409-3409

CAN 67841

Dear Ms. Howell:

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>
2016	G2	9/3/16 - 9/16/16

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 Bronson, Chief  
Bureau of Election Records

EXHIBIT 5(12 of 17)



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

Final Notice - 9114 9014 9645 0630 6764 30 -  
Delivery Confirmation:

November 3, 2016

Kelley Lynn Howell  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409-3409

CAN 67841

Dear Ms. Howell:

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>
2016	G3	9/17/16 - 9/30/16

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 Bronson, Chief  
Bureau of Election Records

EXHIBIT 5 (13 of 17)



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice** - **9114 9014 9645 0630 6764 30** -  
**Delivery Confirmation:**

November 3, 2016

Kelley Lynn Howell  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409-3409

CAN 67841

Dear Ms. Howell:

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>
2016	G5	10/8/16 - 10/14/16

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 Bronson, Chief  
Bureau of Election Records

EXHIBIT 5(14 of 17)





FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

Final Notice - **9114 9014 9645 0630 6764 30** -  
Delivery Confirmation:

November 3, 2016

Kelley Lynn Howell  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409-3409

CAN 67841

Dear Ms. Howell:

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>
2016	G6	10/15/16 - 10/21/16

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.

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

Sincerely,

Kristi Reid Bronson, Chief  
Bureau of Election Records

EXHIBIT 5(15 of 17)

16 NOV 22 AM 11:35

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SECRETARY OF STATE



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FIRST CLASS



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0001403894 NOV 09 2016

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BC: 32399650499

\*1566-04502-16-25

Kelley Howell  
Candidate for State Representative  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409

1820  
93

JTF  
IT32180-6503409



EXHIBIT 5(16 of 17)



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

November 7, 2016

Kelley Lynn Howell  
1963 Brandywine Road, 303  
West Palm Beach, FL 33409-3409

CAN 67841

Dear Ms. Howell:

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 November 4, 2016.

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.

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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 Bronson, Chief  
Bureau of Election Records

EXHIBIT 5(17 of 17)



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice**                      USPS TRACKING #  
**Delivery Confirmation:** 9114 9014 9645 1081 2821 33

November 15, 2017

Kelley Lynn Howell  
20403 Port Bishop Lane  
Richmond, TX 77407-7407

CAN 67841

Dear Ms. Howell:

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>
2016	G7	10/22/16 - 11/3/16

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: Kelley Howell  
Candidate for State Representative, District 91

**EXHIBIT** 6(10A7)



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice** USPS TRACKING #  
**Delivery Confirmation:** 9114 9014 9645 1081 2821 33

November 15, 2017

Kelley Lynn Howell  
20403 Port Bishop Lane  
Richmond, TX 77407-7407

CAN 67841

Dear Ms. Howell:

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>
2016	G6	10/15/16 - 10/21/16

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: Kelley Howell  
Candidate for State Representative, District 91

**EXHIBIT** 6 (2 of 7)



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice** USPS TRACKING #  
**Delivery Confirmation:** 9114 9014 9645 1081 2821 33

November 15, 2017

Kelley Lynn Howell  
20403 Port Bishop Lane  
Richmond, TX 77407-7407

CAN 67841

Dear Ms. Howell:

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>
2016	G5	10/8/16 - 10/14/16

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: Kelley Howell

Candidate for State Representative, District 91

EXHIBIT 6(30P 77)



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

USPS TRACKING #

**Final Notice** 9114 9014 9645 1081 2821 33  
**Delivery Confirmation:**

November 15, 2017

Kelley Lynn Howell  
20403 Port Bishop Lane  
Richmond, TX 77407-7407

CAN 67841

Dear Ms. Howell:

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>
2016	G3	9/17/16 - 9/30/16

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.

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

Sincerely,

Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Kelley Howell

Candidate for State Representative, District 91

EXHIBIT 6(4 of 7)



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice**

**Delivery Confirmation:**

USPS TRACKING #  
9114 9014 9645 1081 2821 33

November 15, 2017

Kelley Lynn Howell  
20403 Port Bishop Lane  
Richmond, TX 77407-7407

CAN 67841

Dear Ms. Howell:

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>
2016	G2	9/3/16 - 9/16/16

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: Kelley Howell

Candidate for State Representative, District 91

EXHIBIT 6 (5 of 7)





FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice**

**Delivery Confirmation:**

USPS TRACKING #  
& CUSTOMER  
RECEIPT

**9114 9014 9645 1081 2821 33**  
For Tracking or Inquiries go to [USPS.com](http://USPS.com)  
or call 1-800-222-1811

November 15, 2017

Kelley Howell  
Candidate for State Representative, District 91  
20403 Port Bishop Lane  
Richmond, TX 77407-7407

CAN 67841

Dear Ms. Howell:

A recent review of the Division's records show that the Division has not yet received your termination report or the required notification that no reportable activity occurred, whichever is applicable.

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report or notification 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.

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

Sincerely,

Kristi Reid Willis, Chief  
Bureau of Election Records

EXHIBIT 6(6 of 7)

# USPS Tracking®

FAQs > (<http://faq.usps.com/?articleId=220900>)

**Track Another Package +**

**Tracking Number:** 9114901496451081282133

Remove X

**Expected Delivery on**

**TUESDAY**

**21** NOVEMBER  
2017 ⓘ

by  
**8:00pm** ⓘ

**✓ Delivered**

November 21, 2017 at 5:23 pm  
DELIVERED, IN/AT MAILBOX  
RICHMOND, TX 77407

Get Updates ∨

---

**Text & Email Updates**



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**Tracking History**



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**Product Information**



See Less ^

How can I help you?

EXHIBIT 6(7 of 7)



RECEIVED

Summons and Subpoenas Department  
PO Box 1415 MAC #D1111-016  
Charlotte, NC 28201  
Voice: (480) 724-2000

2017 JUN 16 A 10:40

STATE OF FLORIDA  
ELECTIONS COMMISSION

June 08, 2017

Florida Elections Commission  
Attn: Inv. Cedric Oliver  
107 W. Gaines Street  
Collins Building, Suite 224  
Tallahassee, FL 32399

Subject: Additional information needed for your Wells Fargo account records request.

Case name: in re KLH; Case No. FEC 16-551  
Agency reference number: FEC165511655147  
Bank reference number: 18165470

Dear Attn: Inv. Cedric Oliver

We received your legal order, and were not able to locate the requested information. So that we can move forward with researching your request, please provide us with additional information as described below **within 10 days** from the date of this letter.

Please note that our research is limited to accounts at Wells Fargo Bank NA.

**What you need to do**

- \* Send us the following information

Unable to locate the following provided entities - Kelley Lynn Howell Campaign Account for Representative, District 91; Kelley Lynn Howell for State Representative, District 91; Kelley Lynn Howell Campaign Account and/or Campaign Account of Kelly Lyn Howell.

- \* Mail to :

Summons and Subpoenas Department  
PO Box 1415 MAC #D1111-016  
Charlotte, NC 28201

If we do not receive your information within 10 days from the date of this letter, we will consider our response to your legal order complete.

IF you have questions, please call us at (480) 724-2000 Monday – Friday, 8:00 a.m. to 8:00 p.m. Eastern Time

Thank you.

Sincerely,

*Dawn Ward*

Dawn Ward  
Operations Manager  
Summons and Subpoenas Department

EXHIBIT 7



RE: Referrals  
Bronson, Kristi R.  
to:  
Tracie Aulet  
04/02/2014 02:49 PM  
Show Details

Security:

To ensure privacy, images from remote sites were prevented from downloading. Show Images

The notice that no report will be filed is the waiver, which must be filed in the EFS. We do not require anything separate in writing.

*Regards,*

*Kristi Reid Bronson, Chief  
Division of Elections,  
Bureau of Election Records  
(850) 245-6240*

---

**From:** Tracie Aulet [mailto:Tracie.Aulet@myfloridalegal.com]  
**Sent:** Wednesday, April 02, 2014 12:56 PM  
**To:** Bronson, Kristi R.  
**Subject:** Referrals

Good Afternoon Kristi,

I am investigating a referral from DOE for failure to notify the filing officer in writing on the prescribed reporting date that no report would be filed, i.e. the untimely filing of waivers.

Would you please inform me as to what the procedure is for a candidate who wants to notify the Division in writing that there will be no report filed? Is it similar to the request for password in that they have to fax a signed letter to the Division? Does the Division acknowledge receipt of the notification that no report will be filed? Once the letter is received is the candidate still required to file the actual waiver of report?

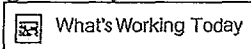
Thank you for your assistance in this matter.

Sincerely,

Tracie L. Aulet  
Investigation Specialist II  
Florida Elections Commission  
The Collins Building, Suite 224  
107 West Gaines Street  
Tallahassee, FL 32399

Please note that Florida has a broad public records law, and that all correspondence to me via e-mail may be subject to disclosure.

@ItsWorkingFL



The Department of State is committed to excellence.  
Please take our [Customer Satisfaction Survey](#).

EXHIBIT 8



[search](#) | [directory](#) | [contact us](#) | [411](#) | [subscribe](#) | [tour](#) | [help](#)

Florida Department of State - Division of Elections

Florida Election System Reports

Candidate/Committee Lookup

Candidate Name: Kelley Howell

Name:

Account: 67841

Election:

Acct:

Type:

Date Due	Type	Date Filed	Status	Days Late	Fine Assessed	Appealed	Amount Fined	Amount Paid
2/6/2017	TR		FEC	0	\$0.00		\$0.00	\$0.00
11/4/2016	G7		FEC	0	\$0.00		\$0.00	\$0.00
10/28/2016	G6		FEC	0	\$0.00		\$0.00	\$0.00
10/21/2016	G5		FEC	0	\$0.00		\$0.00	\$0.00
10/14/2016	G4		SNT	0	\$0.00		\$0.00	\$0.00
10/7/2016	G3		FEC	0	\$0.00		\$0.00	\$0.00
9/23/2016	G2		FEC	0	\$0.00		\$0.00	\$0.00
9/9/2016	G1		FEC	0	\$0.00		\$0.00	\$0.00
8/26/2016	P7		FOI	0	\$0.00		\$0.00	\$0.00
8/19/2016	P6	8/16/2016						
8/12/2016	P5	8/16/2016	CLO	4	\$0.00		\$0.00	\$0.00
8/5/2016	P4	8/16/2016	CLO	11	\$0.00		\$0.00	\$0.00
7/29/2016	P3	8/16/2016	CLO	18	\$0.00		\$0.00	\$0.00
7/15/2016	P2	8/16/2016	CLO	32	\$0.00		\$0.00	\$0.00
7/1/2016	P1	8/16/2016	CLO	46	\$0.00		\$0.00	\$0.00

EXHIBIT 9(1 of 2)



**Florida Department of State  
Division of Elections**

**2016 General Election  
Kelley Howell (WRI)  
State Representative**

**Campaign Finance Activity**

**Note:** The information presented below was obtained from the Committee's/Candidate's Campaign Treasurer's Report filed with the Division of Elections. About the Campaign Finance Data Base.

	Filing Period	Contributions			Expend	Other	Transfers
		Monetary	Loans	InKind			
<b>W</b>	06/22/2016 - 06/24/2016	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	06/25/2016 - 07/08/2016	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	07/09/2016 - 07/22/2016	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	07/23/2016 - 07/29/2016	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	07/30/2016 - 08/05/2016	0.00	0.00	0.00	0.00	0.00	0.00
<b>W</b>	08/06/2016 - 08/12/2016	0.00	0.00	0.00	0.00	0.00	0.00
<input checked="" type="radio"/>	<b>All Dates (Totals)</b>	0.00	0.00	0.00	0.00	0.00	0.00

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

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

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

Select Detail Type

Contributions ▼

Select Sort Order

Date(Ascending) ▼

Select Output Type

Display On Screen ▼

EXHIBIT 9(2 of 2)

**STATEMENT OF  
CANDIDATE**

(Section 106.023, F.S.)

(Please print or type)

OFFICE USE ONLY

RECEIVED  
DEPARTMENT OF STATE

2016 JUN 22 AM 9:38

I, Kelley Lynn Howell

candidate for the office of State House District 91

have been provided access to read and understand the requirements of  
Chapter 106, Florida Statutes.

X Kelley L. Howell  
Signature of Candidate

6/21/2016  
Date

Each candidate must file a statement with the qualifying officer within 10 days after the Appointment of Campaign Treasurer and Designation of Campaign Depository is filed. Willful failure to file this form is a first degree misdemeanor and a civil violation of the Campaign Financing Act which may result in a fine of up to \$1,000, (ss. 106.19(1)(c), 106.265(1), Florida Statutes).



**FLORIDA ELECTIONS COMMISSION**

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

**[www.fec.state.fl.us](http://www.fec.state.fl.us); [fec@myfloridalegal.com](mailto:fec@myfloridalegal.com)**

February 27, 2018

Kelley Howell  
20403 Port Bishop Lane  
Richmond, TX 77407-7407

**RE: Case No.: FEC 17-447; Respondent: Kelley Howell**

Dear Ms. Howell:

On December 7, 2017, the Florida Elections Commission received a complaint alleging that you violated Florida's election laws. I have reviewed the complaint and find that it contains one or more **legally sufficient allegations**. The Commission staff will investigate the following alleged violations:

**Section 106.07(7), Florida Statutes:** As alleged in the complaint, Respondent may have failed to notify the filing officer on the prescribed reporting date that no report would be filed on that date because she had not received funds, made contributions, or expended reportable funds during the following reporting periods:

- 2016 G2
- 2016 G3
- 2016 G5
- 2016 G6
- 2016 G7
- 2016 TR



Kelley Howell  
February 27, 2018  
Page 2  
FEC 17-447

**Section 106.19(1)(c), Florida Statutes:** As alleged in the complaint, Respondent may have falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, when she failed to file a report on the prescribed reporting date for the following reporting periods:

- 2016 G2
- 2016 G3
- 2016 G5
- 2016 G6
- 2016 G7
- 2016 TR


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 make a written recommendation (Staff Recommendation or SR) to the Commission as to whether there is probable cause to charge 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. You and the complainant will receive notice at least 14 days before any hearing at which your case is to be considered.

Please note that all documents related to this matter will be mailed to the above address unless you **notify us of a new address**. Also, please remember that complaints, Commission 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.

For additional information, please refer to the "Frequently Asked Questions" section of the Commission's website ([www.fec.state.fl.us](http://www.fec.state.fl.us)).

If you have additional questions, please contact **Cedric Oliver**, the investigator assigned to this case at extension 114.

Sincerely,



Amy McKeever Toman  
Executive Director

AMT/enr

**DIVISION OF ELECTIONS  
FEC NOTICE FORM**

RECEIVED

2017 DEC -7 A 9:50

To FEC from Division of Elections

STATE OF FLORIDA  
ELECTIONS COMMISSION

---

---

**Name:** Kelley Howell

**Account Number:** 67841

**Treasurer:** Kelley Howell

---

---

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, Florida Statutes. An apparent violation of Chapter 106, F.S., has occurred based upon the candidate's alleged failure to file a report after notice as required by section 106.07(8)(d), Florida Statutes, or failure to notify the filing officer on the prescribed reporting date that no report was to be filed as required by Section 106.07(7), Florida Statutes.

The following reports or notices are outstanding after notification:

2016 G2

2016 G3

2016 G5

2016 G6

2016 G7

2016 TR

**Sent By:** Kristi Reid Willis  
**Date:** December 5, 2017

KRW

ejr

**AFFIDAVIT**

**STATE OF FLORIDA**

**County of Leon**

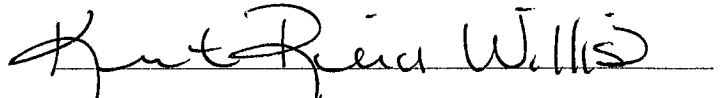
**Kristi Reid Willis, being duly sworn, says:**

1. I am the Chief of the Bureau of Election Records of the Division of Elections (Division). In that capacity, I oversee the Division's duties related to the filing of campaign finance reports.
2. This affidavit is made upon my personal knowledge, including information obtained from review of the attached records, of which I am the custodian.
3. I am of legal age and competent to testify to the matters stated herein.
4. Kelley Howell (67841) was a 2016 candidate for the office of State Representative.
5. On June 22, 2016, Ms. Howell filed the Appointment of Campaign Treasurer and Designation of Campaign Depository with the Division. She appointed herself as treasurer.
6. The 2016 G2 campaign treasurer's report was due on September 23, 2016. On September 26, 2016, the Division mailed Ms. Howell notification that the 2016 G2 treasurer's report had not been filed.
7. On October 11, 2016, the Division mailed Ms. Howell notification that the 2016 G2 treasurer's report had not been filed.
8. On November 15, 2017, the Division mailed Ms. Howell final notification with delivery confirmation that the 2016 G2 treasurer's report had not been filed. (See attached letter and delivery confirmation.)
9. The 2016 G3 campaign treasurer's report was due on October 7, 2016. On October 10, 2016, the Division mailed Ms. Howell notification that the 2016 G3 treasurer's report had not been filed.
10. On October 17, 2016, the Division mailed Ms. Howell notification that the 2016 G3 treasurer's report had not been filed.
11. On November 15, 2017, the Division mailed Ms. Howell final notification with delivery confirmation that the 2016 G3 treasurer's report had not been filed. (See attached letter and delivery confirmation.)

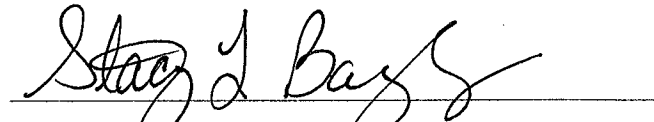
12. The 2016 G5 campaign treasurer's report was due on October 21, 2016. On November 15, 2017, the Division mailed Ms. Howell final notification with delivery confirmation that the 2016 G5 treasurer's report had not been filed. (See attached letter and delivery confirmation.)
13. The 2016 G6 campaign treasurer's report was due on October 28, 2016. On November 1, 2016, the Division mailed Ms. Howell notification that the 2016 G6 treasurer's report had not been filed.
14. On November 15, 2017, the Division mailed Ms. Howell final notification with delivery confirmation that the 2016 G6 treasurer's report had not been filed. (See attached letter and delivery confirmation.)
15. The 2016 G7 campaign treasurer's report was due on November 4, 2016. On November 15, 2017, the Division mailed Ms. Howell final notification with delivery confirmation that the 2016 G7 treasurer's report had not been filed. (See attached letter and delivery confirmation.)
16. The 2016 TR campaign treasurer's report was due on February 6, 2017. On November 15, 2017, the Division mailed Ms. Howell final notification with delivery confirmation that the 2016 TR treasurer's report had not been filed. (See attached letter and delivery confirmation.)
17. Ms. Howell did not notify the Division of Elections prior to or on the prescribed reporting dates for the 2016 G2, 2016 G3, 2016 G5, 2016 G6, 2016 G7, and 2016 TR reports that no reports were to be filed.

18. As of December 5, 2017, Ms. Howell has not filed the 2016 G2, 2016 G3, 2016 G5, 2016 G6, 2016 G7, and 2016 TR reports.

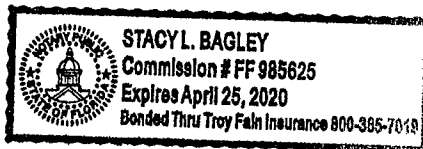
**I hereby swear or affirm that the foregoing information is true and correct to the best of my knowledge.**

  
Signature of Affiant

Sworn to (or affirmed) and subscribed before me this 5<sup>th</sup> day of December, 2017.

  
Signature of Notary Public - State of Florida

Print, Type, or Stamp Commissioned Name of Notary Public  
Personally Known





FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice**

**Delivery Confirmation:**

USPS TRACKING #

9114 9014 9645 1081 2821 33

November 15, 2017

Kelley Lynn Howell  
20403 Port Bishop Lane  
Richmond, TX 77407-7407

CAN 67841

Dear Ms. Howell:

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>
2016	G2	9/3/16 - 9/16/16

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: Kelley Howell

Candidate for State Representative, District 91



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

USPS TRACKING #

**Final Notice** 9114 9014 9645 1081 2821 33

**Delivery Confirmation:**

November 15, 2017

Kelley Lynn Howell  
20403 Port Bishop Lane  
Richmond, TX 77407-7407

CAN 67841

Dear Ms. Howell:

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>
2016	G3	9/17/16 - 9/30/16

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: Kelley Howell  
Candidate for State Representative, District 91









FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice**                      USPS TRACKING #  
**Delivery Confirmation: 9114 9014 9645 1081 2821 33**

November 15, 2017

Kelley Lynn Howell  
20403 Port Bishop Lane  
Richmond, TX 77407-7407

CAN 67841

Dear Ms. Howell:

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>
2016	G7	10/22/16 - 11/3/16

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: Kelley Howell  
Candidate for State Representative, District 91



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice**

**Delivery Confirmation:**

USPS TRACKING # **9114 9014 9645 1081 2821 33**  
& CUSTOMER RECEIPT  
For Tracking or Inquiries go to USPS.com  
or call 1-800-222-1811

November 15, 2017

Kelley Howell

Candidate for State Representative, District 91

20403 Port Bishop Lane

Richmond, TX 77407-7407

CAN 67841

Dear Ms. Howell:

A recent review of the Division's records show that the Division has not yet received your termination report or the required notification that no reportable activity occurred, whichever is applicable.

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report or notification 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,

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

Kristi Reid Willis, Chief  
Bureau of Election Records

# USPS Tracking®

FAQs > (<http://faq.usps.com/?articleId=220900>)

**Track Another Package +**

**Tracking Number:** 9114901496451081282133

Remove X

**Expected Delivery on**

**TUESDAY**

**21** NOVEMBER  
2017 ⓘ

by  
**8:00pm** ⓘ

**✓ Delivered**

November 21, 2017 at 5:23 pm  
DELIVERED, IN/AT MAILBOX  
RICHMOND, TX 77407

Get Updates ▼

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**Text & Email Updates** ▼

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**Tracking History** ▼

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**Product Information** ▼

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X

See Less ^

How can I help you?

**HISTORY NOTES**  
Kelley Howell - 67841

Unique ID	Date Recorded	Last Edited Date	Originally Recorded By
51253	12/6/2016 10:21:00 AM		njtaylor
Addendum: Email sent to Kelley Howell			
The following is the body of an email I sent to Ms. Howell on 12/06/2016.			
Dear Ms. Howell,			
We have received returned mail from your address at:			
1963 Brandywine Road, 303 West Palm Beach, FL 33409			
I have attached a copy of the returned mail to this email. Please update your address with us. You may do so by logging into EFS and changing it in the Campaign Account section, or by mailing a signed letter with the address change to:			
Bureau of Election Records Florida Department of State R.A. Gray Building, Room 316 500 S. Bronough Street Tallahassee, FL 32399			
Or by fax to: 850-245-6259 or 850-245-6260			
If you have any questions please contact our help desk at 850-245-6280.			
Thank you.			
12/06/2016 -njt			
51224	12/5/2016 9:25:00 AM		njtaylor
RE: Returned Mail			
Attempted to contact Ms. Howell at (561) 618-6111. The call was answered by an acquaintance of Ms. Howell who was having trouble speaking. She said she would take a message for Ms. Howell. I asked her to please have Ms. Howell contact our Help Desk about the returned mail we have been receiving from her address.			
12/05/2016 -njt			
51207	12/1/2016 4:38:00 PM		njtaylor
RE: Final Notice and Returned Mail			
As before I attempted to contact Ms. Howell at (561) 618-6111. The call went to voicemail. I left a message informing her of the final notice of her failure to file campaign reports with our office. I also informed her of the returned mail we have been receiving from her address. I urged her to update her address and contact our BER Help Desk by phone so that we can assist her with any problems she may have with filing her reports. I also emailed the address we have on file for her at kelley.howell4@gmail.com. The body of the email follows:			
Dear Ms. Howell,			
I am writing to inform you of the multiple instances of returned mail we have received from the address we have on file for your campaign. This returned mail includes final notice of your failure to file the necessary campaign finance reports with our office. Please contact our office by mail or by telephone at 850-245-6280 regarding the campaign finance reports and your current address. I have attached the relevant audits and notice letters to this email.			
12/01/2016 -njt			
51116	11/15/2016 1:02:00 PM		njtaylor
RE: Returned Mail			
Attempted to contact Ms. Howell at (561) 618-6111 at 12:58 PM about the returned mail we have been receiving from her address. The call went to voicemail. I left a message informing her of the returned mail we have been receiving. I included the number for our BER Help Desk and asked that she contact us about updating her address. - njt 11/15/2016			

**HISTORY NOTES**  
Kelley Howell - 67841

Unique ID	Date Recorded	Last Edited Date	Originally Recorded By
51092	11/10/2016 8:31:00 AM		njtaylor
RE: Returned Mail			
At 8:21 AM I attempted to contact Ms. Howell at the number provided in EFS. The call went to voicemail. I gave my name and office (Division of Elections) and requested that Ms. Howell contact our BER Help Desk immediately regarding her address and the returned mail we have been receiving from it. I included the number for our Help Desk in the message. 11/10/2016 -njt			
51080	11/7/2016 4:34:00 PM		njtaylor
RE: Returned Mail			
Sent the following email to Kelley Howell at kelley.howell4@gmail.com:			
Dear Ms. Howell,			
I am writing to inform you that the DoE has been unable to send mail to your address at 1963 Brandywine Road, 303, West Palm Beach, FL 33409. All mail sent to that address has been returned to sender by the post office. Please check your address in EFS and contact us as soon as possible to let us know if there are any changes. You can call our help desk at (850) 245-6280 with any questions between the hours of 8 AM and 5 PM, Monday thru Friday.			
Thank you			
51078	11/7/2016 4:26:00 PM		njtaylor
RE: Returned Mail			
Attempted to contact Kelley Howell at (561) 618-6111 at approximately 4:20 PM about the stack of returned mail we have received from her address. Call went to voicemail. I left a message asking her to confirm her address in EFS and to please contact us at our help desk number. -njt			
48287	6/29/2016 2:52:00 PM		STBaker
RE: EFS Pin			
Left voicemail for Kelley Howell, Candidate and Treasurer, advising her to contact the Division if she did not receive her treasurer's pin.			