

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**In Re: Michael J. Peragine**

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**Case No.: FEC 14-284**

**TO:** Michael J. Peragine  
6231 PGA Blvd., Unit 104-308  
Palm Beach Gardens, FL 33418

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, **November 16, 2016 at 8:30 am, or as soon thereafter as the parties can be heard**, at the following location: **Senate Office Building, 404 South Monroe Street, Room 110-S, Tallahassee, Florida 32399**

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

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  
November 1, 2016

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 14-284**

**v.**

**Michael J. Peragine, in his capacity as treasurer  
for Citizens for Ethical Leadership,**

**Respondent.**

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**ORDER OF PROBABLE CAUSE**

**THIS MATTER** was heard by the Florida Elections Commission (Commission) at its regularly scheduled meeting on August 17, 2016, in Tallahassee, Florida.

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 December 9, 2014, Respondent violated Section 106.19(1)(c), Florida Statutes, by falsely reporting or deliberately failing to include information required by Chapter 106 on Citizens for Ethical Leadership's 2014 M5 Report.

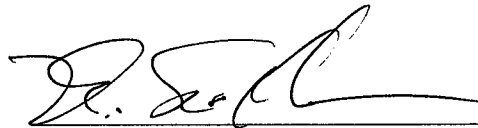
The Commission also finds that there is **no probable cause** to charge Respondent with the following violations:

**Section 106.0703(6), Florida Statutes:** Michael J. Peragine, treasurer for Citizens for Ethical Leadership, an electioneering communications organization (ECO) registered with the Division of Elections, failed to timely notify the filing officer that the ECO had no reportable activity and, therefore, would not be filing

reports on the prescribed reporting dates for the 2014 M5, 2014 P1 and 2014 P1A reporting periods.

**Section 106.19(1)(c), Florida Statutes:** Michael J. Peragine, treasurer for Citizens for Ethical Leadership, an electioneering communications organization (ECO) registered with the Division of Elections, falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, when he failed to file reports on the prescribed reporting dates for the 2014 P1 and 2014 P1A reporting periods.

**DONE AND ORDERED** by the Florida Elections Commission on August 17, 2016.



M. Scott Thomas, Chairman  
Florida Elections Commission

Copies furnished to:  
Eric M. Lipman, General Counsel  
Michael J. Peragine, treasurer of  
Citizens for Ethical Leadership  
Division of Elections, Complainant

### NOTICE OF RIGHT TO A HEARING

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

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

Third, you may request a formal hearing held before an administrative law judge in the Division

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

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

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



**FLORIDA ELECTIONS COMMISSION**

107 W. Gaines Street, Suite 224

Collins Building

Tallahassee, Florida 32399-1050

(850) 922-4539

March 1, 2016

Michael J. Peragine, Treasurer  
277 Sedona Way  
Palm Beach Gardens, FL 33418

**RE: Case No.: FEC 14-284; Respondent: Michael J. Peragine**

Dear Mr. Peragine:

The Florida Elections Commission at its last regularly scheduled meeting was unable to hear this case. Therefore, this case has been rescheduled for its next meeting, which is scheduled for May 18-19, 2016 in Tallahassee. A notice of hearing will be mailed approximately 14 days before the hearing.

If you have any questions, please contact us at the number listed above or at [fec@myfloridalegal.com](mailto:fec@myfloridalegal.com)

Sincerely,

*/s/ Amy McKeever Toman*

Executive Director

AMT/dam

cc: Division of Elections, Complainant

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**In Re: Michael J. Peragine**

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**Case No.: FEC 14-284**

**TO:** Michael J. Peragine  
277 Sedona Way  
Palm Beach Gardens, FL 33418

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

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

A hearing will be held in this case before the Florida Elections Commission on, **February 17, 2016 at 10:00 am, or as soon thereafter as the parties can be heard**, at the following location: **Florida State Conference Center, 555 West Pensacola Street, Room #108, Tallahassee, Florida 32306.**

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.

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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  
February 2, 2016

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

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

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

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

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

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

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



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

December 1, 2015

Michael J. Peragine, Treasurer  
277 Sedona Way  
Palm Beach Gardens, FL 33418

**RE: Case No.: FEC 14-284; Respondent: Michael J. Peragine, Treasurer**

Dear Mr. Peragine:

The Florida Elections Commission at its last regularly scheduled meeting was unable to hear this case. Therefore, this case has been rescheduled for its next meeting, which is scheduled for February 17-18, 2016 in Tallahassee. A notice of hearing will be mailed approximately 14 days before the hearing.

If you have any questions, please contact us at the number listed above or at [fec@myfloridalegal.com](mailto:fec@myfloridalegal.com).

Sincerely,

*/s/ Amy McKeever Toman*  
Executive Director

AMT/dam  
cc: Division of Elections, Complainant

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**In Re: Michael J. Peragine, Treasurer, Citizens  
for Ethical Leadership**

**Case No.: FEC 14-284**

**TO:** Michael J. Peragine, Treasurer, Citizens for  
Ethical Leadership  
277 Sedona Way  
Palm Beach Gardens, FL 33418

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, **November 17, 2015 at 10:30 AM, or as soon thereafter as the parties can be heard**, at the following location: **Department of Business and Professional Regulation, 1940 North Monroe Street, Tallahassee, FL 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.

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.

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

**Amy McKeever Toman**  
Executive Director  
Florida Elections Commission  
November 2, 2015

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**FLORIDA ELECTIONS COMMISSION**

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

September 9, 2015

Michael J. Peragine, Treasurer  
277 Sedona Way  
Palm Beach Gardens, FL 33418

**RE: Case No.: FEC 14-284; Respondent: Michael J. Peragine, Treasurer**

Dear Mr. Peragine:

The Florida Elections Commission at its last regularly scheduled meeting was unable to hear this case. Therefore, this case has been rescheduled for its next meeting, which is scheduled for November 17-18, 2015 in Tallahassee. A notice of hearing will be mailed approximately 14 days before the hearing.

If you have any questions, please contact us at the number listed above or at [fec@myfloridalegal.com](mailto:fec@myfloridalegal.com).

Sincerely,

*/s/ Amy McKeever Toman*  
Executive Director

AMT/dam  
cc: Division of Elections, Complainant

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**In Re: Michael J. Peragine, in his capacity as  
treasurer for Citizens for Ethical  
Leadership**

**Case No.: FEC 14-284**

**TO:** Citizens for Ethical Leadership  
Attn: Michael J. Peragine, Treasurer  
277 Sedona Way  
Palm Beach Gardens, FL 33418

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 **August 26, 2015, at 11:00 am, or as soon thereafter as the parties can be heard**, at the following location: **Senate Office Building, Room 110-S, 404 South Monroe Street, Tallahassee, FL 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

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

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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  
August 11, 2015



**FLORIDA ELECTIONS COMMISSION**

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

May 29, 2015

Michael J. Peragine, Treasurer  
Citizens for Ethical Leadership (ECO)  
277 Sedona Way  
Palm Beach Gardens, FL 33418

**RE: Case No.: FEC 14-284; Respondent: Michael J. Peragine, in his capacity as Treasurer  
for Citizens for Ethical Leadership (ECO)**

Dear Mr. Peragine:

The Florida Elections Commission at its last regularly scheduled meeting was unable to hear this case. Therefore, this case has been rescheduled for its next meeting, which is scheduled for August 18-19, 2015 in Tallahassee. A notice of hearing will be mailed approximately 14 days before the hearing.

If you have any questions, please contact us at the number listed above or at [fec@myfloridalegal.com](mailto:fec@myfloridalegal.com).

Sincerely,

*/s/Amy McKeever Toman*  
Executive Director

AMI/dam  
cc: Division of Elections, Complainant/Filing Officer

STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION

**In Re: Michael J. Peragine, in his capacity as  
treasurer for Citizens for Ethical  
Leadership**

**Case No.: FEC 14-284**

**TO:** Citizens for Ethical Leadership  
Attn: Michael J. Peragine, Treasurer  
277 Sedona Way  
Palm Beach Gardens, FL 33418

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 20, 2015, at 11:00 am, or as soon thereafter as the parties can be heard**, at the following location: **Department of Business and Professional Regulation, 1940 North Monroe Street, Tallahassee FL 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

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

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

*Amy McKeever Toman*  
Executive Director  
Florida Elections Commission  
May 5, 2015

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.

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

If this is an **informal hearing**, it will be conducted pursuant Sections 120 569 and 120.57(2), Florida Statutes; Chapter 28 and Commission Rule 2B-1.004, Florida Administrative Code. At the hearing, the Commission will decide whether the Respondent committed the violation(s) charged in the Order of Probable Cause. The Respondent will be permitted to testify. However the Respondent may not call witnesses to testify.

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

STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION

**In Re: Michael J. Peragine, in his capacity  
As treasurer for Citizens for Ethical  
Leadership**

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**Case No.: FEC 14-284**

**STAFF RECOMMENDATION FOLLOWING INVESTIGATION**

Pursuant to Section 106.25(4)(c), Florida Statutes, undersigned staff counsel files this written recommendation for disposition of the complaint in this case recommending that there is **probable cause** to charge Respondent with violating **Section 106.19(1)(c), Florida Statutes**, and **no probable cause** to charge Respondent with violating **Section 106.0703(6), Florida Statutes**. Based upon a thorough review of the Report of Investigation submitted on March 9, 2015, the following facts and law support this staff recommendation

1. On September 2, 2014, the Florida Elections Commission ("Commission") received a referral from the Division of Elections ("Division") alleging that Michael J. Peragine, in his capacity as treasurer for Citizens for Ethical Leadership ("Respondent") violated Chapter 106, Florida Statutes

2. On or about October 7, 2014, the Executive Director sent Respondent a Letter of Legal Sufficiency notifying Respondent that Commission staff would investigate Sections 106.0703(6) and 106.19(1)(c), Florida Statutes, for the following reporting periods:

- 2014 M5
- 2014 P1
- 2014 P1A

3. Respondent is the treasurer of Citizens for Ethical Leadership ("CEL"), an Electioneering Communications Organization ("ECO") registered with the Division.<sup>1</sup> On August 30, 2012, CEL filed its Electioneering Communication Statement of Organization form ("DS-DE 103") with the Division. CEL identified Michael J. Peragine as its chairperson and treasurer. (ROI Exhibit 1)<sup>2</sup> On the same date, CEL filed its Registered Agent Statement of Appointment form ("DS-DE 41") appointing Michael J. Peragine as the Committee's registered agent. (ROI Exhibit 2, page 1)

4. By letter dated September 4, 2012, Kristi Reid Bronson, Division of Elections,

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<sup>1</sup> At all times pertinent to the issues in this case, Michael J. Peragine was CEL's chairman, treasurer, and registered agent.

<sup>2</sup> The Report of Investigation shall be referred to herein as "ROI."

Chief, Bureau of Election Records notified Respondent that CEL had been placed on the Division's active list as an ECO. A security envelope containing Respondent's confidential PIN number to access the Division's electronic filing system ("EFS") was also enclosed in the letter. (ROI Exhibit 3, page 1)

5. The September 4, 2012 acknowledgment letter also informed Respondent that all of the Division's publications and reporting forms were available on the Division's website. The letter directed Respondent to print a copy of Chapters 104 and 106, Florida Statutes, the 2012 *Electioneering Communications Organization Handbook*, and the 2012 Calendar of Reporting Dates. (ROI Exhibit 3, page 3)

**Section 106.0703(6), Florida Statutes.**

6. Section 106.0703(6) Florida Statutes, provides:

Notwithstanding any other provisions of this chapter, in any reporting period during which an electioneering communications organization has not received funds, made any contributions, or expended any reportable funds, the treasurer shall file a written report with the filing officer by the prescribed reporting date that no reportable contributions or expenditures were made during the reporting period.

7. The referral alleged that Respondent violated Section 106 0703(6), Florida Statutes, for failing to file written reports on behalf of CEL for the 2014 M5, 2014 P1, and 2014 P1A reporting periods on the prescribed reporting dates indicating that the ECO had no reportable contributions or expenditures for the relative reporting period

8. Section 106 0703(6), Florida Statutes, requires the treasurer of an ECO to file "a written *report*<sup>3</sup> with the filing officer by the prescribed reporting date that no reportable contributions or expenditures were made during the reporting period [emphasis added]." Thus, it does appear that Respondent violated Section 106.0703(6), Florida Statutes, when it failed to timely file written reports of its lack of activity during the noted reporting periods. However, pursuant to Section 106.0703(7)(b), Florida Statutes, jurisdiction over late filed *reports* lies with the filing officer for the imposition of fines as set forth in the fine schedule for the late-filing of reports by an ECO.

**Section 106.19(1)(c), Florida Statutes.**

9. The referral also alleged that Respondent falsely reported or deliberately failed to

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<sup>3</sup> In this regard, the statute governing electioneering communications organizations is distinct from the one governing candidates and political committees. Section 106 07(7), Florida Statutes, requires candidates and political committees to *notify* the filing officer in writing that no report will be filed for reporting periods in which there is no activity. This written notification is accomplished by checking a box marked "Waiver" in the electronic filing system. No written report is required. While it is unclear if or why the Legislature intended to make this distinction between the two categories of potential respondents, the plain language of the statutes is clear.

include information on its 2014 M5, 2014 P1, and 2014 P1A Reports.

### **2014 M5 Report**

10. CEL's 2014 M5 Report covering the dates of May 1, 2014, through May 31, 2014, was due on June 10, 2014. However, Respondent did not file CEL's report on the due date. (Attachment A and ROI Exhibit 14, page 4)

11. Respondent filed a Waiver for CEL's 2014 M5 reporting period on December 9, 2014, indicating that the ECO had no reportable financial transactions during the 2014 M5 reporting period. (Attachment A and Attachment B, page 1)

12. Investigator Oliver obtained a copy of CEL's bank records for the period of May 1, 2014, through May 31, 2014. CEL's May 2014 bank statement indicated that Respondent issued check number 1027 to Anita Carbone for \$3,000 on May 21, 2014. The check cleared CEL's bank account on May 22, 2014. (ROI Exhibit 9 and ROI Exhibit 10, page 1)

13. Based on the foregoing, it appears that Respondent falsely reported information when he filed a Waiver on behalf of CEL for the 2014 M5 reporting period.

### **2014 P1 Report**

14. CEL's 2014 P1 Report covering the dates of June 1, 2014, through June 20, 2014, was due on June 27, 2014. However, Respondent did not file the ECO's report on the due date (Attachment A and ROI Exhibit 14, page 4)

15. Investigator Oliver obtained a copy of CEL's bank records for the period of June 1, 2014, through June 30, 2014. The ECO's June 2014 bank statement indicated that CEL did not have any reportable financial transactions during the 2014 P1 reporting period and no other financial transactions were discovered during the investigation. (ROI Exhibit 10, page 2)

16. Respondent filed a Waiver on behalf of CEL for the 2014 P1 reporting period on December 9, 2014, indicating that the ECO had no reportable transactions. Even though Respondent did not file anything on behalf of CEL on the 2014 P1 Report due date, it does not appear that Respondent falsely reported or deliberately failed to include information by filing a Waiver on behalf of CEL for the 2014 P1 reporting period, but rather Respondent failed to file the ECO's Waiver on time.

17. Based upon the foregoing, it appears Respondent did not falsely report or deliberately fail to include information when he filed a Waiver for CEL's 2014 P1 reporting period.

### **2014 P1A Report**

18. CEL's 2014 P1A Report covering the dates of June 21, 2014, through June 27, 2014, was due on July 4, 2014. However, Respondent did not file the ECO's report on the due

date. (Attachment A and ROI Exhibit 14, page 4)

19 Investigator Oliver obtained a copy of CEL's bank records for the period of June 1, 2014, through June 30, 2014. Respondent's June 2014 bank statement indicated that CEL did not have any reportable financial transactions during the 2014 P1A reporting period and no other financial transactions were discovered during the investigation. (ROI Exhibit 10, page 2)

20 Respondent filed a Waiver on behalf of the ECO for the 2014 P1A reporting period on December 9, 2014, indicating that CEL had no reportable financial transactions. Even though Respondent did not file anything on behalf of the ECO on the 2014 P1A Report due date, it does not appear that Respondent falsely reported or deliberately failed to include information by filing a Waiver on behalf CEL for the 2014 P1A reporting period, but rather Respondent failed to file CEL's Waiver on time.

21 Based upon the foregoing, it appears Respondent did not falsely report or deliberately fail to include information on CEL's Waiver for 2014 P1A reporting period.

22 "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. 1<sup>st</sup> DCA 1995).

23 The above facts show that Respondent is the chairman, treasurer, and registered agent for Citizens for Ethical Leadership, an Electioneering Communications Organization registered with the Division of Elections. The ECO had no reportable financial transactions during the 2014 P1 and 2014 P1A reporting periods, but Respondent filed CEL's Waivers for the two reporting periods late. Respondent also filed a late Waiver on behalf of the CEL for the 2014 M5 reporting period instead of filing a 2014 M5 Report even though CEL had reportable financial transactions during the reporting period. Therefore, when Respondent filed a Waiver on behalf of CEL for the 2014 M5 reporting period, Respondent reported false information.<sup>4</sup>

Based on the foregoing, I recommend the Commission find probable cause to charge Respondent with the following violation:

**Count 1:**

On or about December 9, 2014, Respondent violated Section 106.19(1)(c), Florida Statutes, by falsely reporting or deliberately failing to include information required by Chapter 106 on Citizens for Ethical Leadership's 2014 M5 Report

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<sup>4</sup> Respondent filed Waivers on behalf of CEL for the 2014 M5, 2014 P1 and 2014 P1A reporting periods one week after this case was referred to the Commission.

I further recommend the Commission find no probable cause that Respondent violated Section 106.0703(6), Florida Statutes, and that the Commission find no probable cause that Respondent violated Section 106.19(1)(c), Florida Statutes, when he filed Waivers on behalf of Citizens for Ethical Leadership for the 2014 P1 and 2014 P1A reporting periods

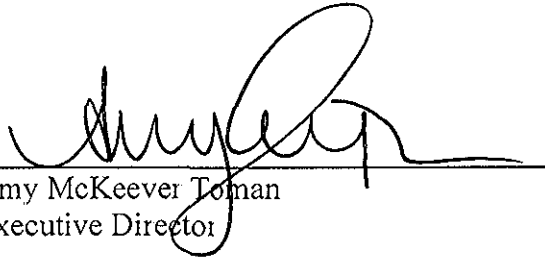
Respectfully submitted on April 10<sup>th</sup>, 2015,



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Eric M Lipman  
General Counsel

I have reviewed this Staff Recommendation on the 10<sup>th</sup> day of April 2015.



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Amy McKeever Toman  
Executive Director

**2014 Calendar of Reporting Dates for  
Electioneering Communications Organizations  
registered with the Division of Elections**

<u>Cover Period</u>	<u>Report Code</u>	<u>Due Date</u>
12/01/13 - 12/31/13	2013 M12	01/10/14
01/01/14 - 01/31/14	2014 M1	02/10/14
02/01/14 - 02/28/14	2014 M2	03/10/14
03/01/14 - 03/31/14	2014 M3	04/10/14
04/01/14 - 04/30/14	2014 M4	05/12/14
05/01/14 - 05/31/14	2014 M5	06/10/14

06/01/14 - 06/20/14	2014 P1	06/27/14
06/21/14 - 06/27/14	2014 P1A	07/04/14
06/28/14 - 07/04/14	2014 P2	07/11/14
07/05/14 - 07/11/14	2014 P2A	07/18/14
07/12/14 - 07/18/14	2014 P3	07/25/14
07/19/14 - 07/25/14	2014 P4	08/01/14
07/26/14 - 08/01/14	2014 P5	08/08/14
08/02/14 - 08/08/14	2014 P6	08/15/14
08/09/14 - 08/21/14	2014 P7	08/22/14
08/22/14	2014 P7A	08/29/14

08/23/14 - 08/29/14	2014 G1	09/05/14
08/30/14 - 09/05/14	2014 G1A	09/12/14
09/06/14 - 09/12/14	2014 G2	09/19/14
09/13/14 - 09/19/14	2014 G2A	09/26/14
09/20/14 - 09/26/14	2014 G3	10/03/14
09/27/14 - 10/03/14	2014 G4	10/10/14
10/04/14 - 10/10/14	2014 G5	10/17/14
10/11/14 - 10/17/14	2014 G6	10/24/14

10/18/14 - 10/24/14*	2014 D1*	10/25/14*
10/25/14*	2014 D2*	10/26/14*
10/26/14*	2014 D3*	10/27/14*
10/27/14*	2014 D4*	10/28/14*
10/28/14*	2014 D5*	10/29/14*
10/29/14*	2014 D6*	10/30/14*

10/18/14 - 10/30/14**	2014 G7**	10/31/14**
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10/31/14*	2014 D8*	11/01/14*
11/01/14*	2014 D9*	11/02/14*
11/02/14*	2014 D10*	11/03/14*

10/31/14**	2014 M10**	11/10/14**
11/01/14 - 11/30/14**	2014 M11**	12/10/14**
12/01/14 - 12/31/14	2014 M12	01/12/15

\* These reports need only contain information on all previously unreported contributions received as of the preceding day; however, expenditures can be reported if desired

\*\* If expenditures for 10/18/14 - 11/02/14 have already been reported during the daily reports, do not duplicate expenditures in this report



# Florida Department of State Division of Elections

## Citizens for Ethical Leadership

### 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. If all contributions for a reporting period are less than 1 dollar Then they may not be displayed

	Filing Period	Contributions					
		Monetary	Loans	InKind	Expend	Other	Transfers
<input type="radio"/>	08/30/2012 - 09/14/2012	8,769 25	0 00	0 00	0 00	0 00	0 00
<input type="radio"/>	09/15/2012 - 09/28/2012	3,780 75	0 00	0 00	3,708 39	3,534 68	0 00
<input type="radio"/>	09/29/2012 - 10/12/2012	15,500 00	0 00	0 00	2,037 72	0 00	0 00
<input type="radio"/>	10/13/2012 - 11/01/2012	85,000 00	0 00	0 00	84,084 22	0 00	0 00
<input type="radio"/>	11/02/2012 - 12/31/2012	0 00	0 00	0 00	12,113 44	108 36	0 00
<b>W</b>	01/01/2013 - 03/31/2013	0 00	0 00	0 00	0 00	0 00	0 00
<b>W</b>	04/01/2013 - 06/30/2013	0 00	0 00	0 00	0 00	0 00	0 00
<b>W</b>	07/01/2013 - 09/30/2013	0 00	0 00	0 00	0 00	0 00	0 00
<input type="radio"/>	10/01/2013 - 10/31/2013	0 00	0 00	0 00	0 00	0 00	0 00
<b>W</b>	11/01/2013 - 11/30/2013	0 00	0 00	0 00	0 00	0 00	0 00
<input type="radio"/>	12/01/2013 - 12/31/2013	0 00	0 00	0 00	2,000 00	0 00	0 00
<b>W</b>	01/01/2014 - 01/31/2014	0 00	0 00	0 00	0 00	0 00	0 00
<b>W</b>	02/01/2014 - 02/28/2014	0 00	0 00	0 00	0 00	0 00	0 00
<b>W</b>	03/01/2014 - 03/31/2014	0 00	0 00	0 00	0 00	0 00	0 00
<b>W</b>	04/01/2014 - 04/30/2014	0 00	0 00	0 00	0 00	0 00	0 00
<b>W</b>	05/01/2014 - 05/31/2014	0 00	0 00	0 00	0 00	0 00	0 00
<b>W</b>		0.00	0 00	0 00	0 00	0 00	0 00

Attachment B, Page 1

	06/01/2014 - 06/20/2014						
W	06/21/2014 - 06/27/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	06/28/2014 - 07/04/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	07/05/2014 - 07/11/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	07/12/2014 - 07/18/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	07/19/2014 - 07/25/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	07/26/2014 - 08/01/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	08/02/2014 - 08/08/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	08/09/2014 - 08/21/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	08/22/2014 - 08/22/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	08/23/2014 - 08/29/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	08/30/2014 - 09/05/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	09/06/2014 - 09/12/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	09/13/2014 - 09/19/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	09/20/2014 - 09/26/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	09/27/2014 - 10/03/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	10/04/2014 - 10/10/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	10/11/2014 - 10/17/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	10/18/2014 - 10/24/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	10/25/2014 - 10/25/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	10/26/2014 - 10/26/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	10/27/2014 - 10/27/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	10/28/2014 - 10/28/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	10/29/2014 - 10/29/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	10/18/2014 - 10/30/2014	0 00	0 00	0 00	0 00	0 00	0 00
		0 00	0 00	0 00	0 00	0 00	0 00

W	10/31/2014 - 10/31/2014						
W	10/31/2014 - 10/31/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	11/01/2014 - 11/01/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	11/02/2014 - 11/02/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	11/01/2014 - 11/30/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	12/01/2014 - 12/31/2014	0 00	0 00	0 00	0 00	0 00	0 00
W	01/01/2015 - 01/31/2015	0 00	0 00	0 00	0 00	0 00	0 00
W	02/01/2015 - 02/28/2015	0 00	0 00	0 00	0 00	0 00	0 00
<input checked="" type="radio"/>	All Dates (Totals)	113,050 00	0 00	0 00	103,943 77	3,643 04	0 00

Note: (E) 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 ▼

Submit Query Now

Query the Campaign Finance Data Base

[Department of State] [Division of Elections] [Candidates and Races] [Campaign Finance Information]

**FLORIDA ELECTIONS COMMISSION**  
**REPORT OF INVESTIGATION**  
**Case No.: FEC 14-284**

**Respondent:** Michael J. Peragine, in his capacity as treasurer for Citizens for Ethical Leadership  
**Counsel for Respondent:** n/a

**Complainant:** Division of Elections  
**Counsel for Complainant:** n/a

On September 2, 2014, the Florida Elections Commission received a sworn complaint alleging that Respondent violated Chapter 106, Florida Statutes. The Commission staff investigated whether Respondent violated the following statutes:

Section 106 0703(6), Florida Statutes, failure of the treasurer of an electioneering communications organization that did not receive any contributions or make any expenditures during a reporting period to notify timely the filing officer, in writing, that no reportable contributions or expenditures were made during the reporting period; 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 is the treasurer of an electioneering communications organization (ECO) registered with the Division. The area, scope, and jurisdiction of the organization is listed as "Statewide, Legislative, Multicounty, Countywide, and Municipal Candidates"

2. Complainant is the Division of Elections

3. Respondent's filing officer is Kristi Reid-Bronson, Chief, Bureau of Election Records.

4. On August 30, 2012, an Electioneering Communication Statement of Organization (DS-DE 103) form was filed with the Division of Elections. Respondent was appointed as the organization's Chairperson and Treasurer. To view a copy of the DS-DE 103 form, refer to exhibit 1.

5. On August 30, 2012, a Registered Agent Statement of Appointment (DS-DE 41) form was filed with the Division of Elections. This form appointed Respondent as the ECO's Registered Agent. To review a copy of the current DS-DE 41 form, refer to exhibit 2.

6. On September 4, 2012, Ms. Bronson sent Respondent—in his capacity as the

ECO's Chairperson and Treasurer—a letter acknowledging that his organization had been placed on the active list as an electioneering communications organization. This letter also informed Respondent of his confidential "PIN" number to access the Division of Election's electronic filing system (EFS) for submitting campaign treasurer's reports and waivers. To review a copy of this September 4, 2012 acknowledgement letter, refer to exhibit 3.

7. On September 2, 2014, the Commission received a referral from the Division 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 three reporting periods. Table 1 summarizes the failure-to-file notices mailed to Respondent informing him that treasurer reports had not been received. Each notice was mailed to the address Respondent provided on the DS-DE 103 form (Exhibit 1). To view a copy of the sworn affidavit from Complainant, refer to exhibit 4. To view copies of the failure-to-file letters, please refer to exhibits 5, 6, and 7.

<b>Table 1: Failure-To-File Notices Mailed to Respondent</b>				
<b>Report</b>	<b>Report Cover Period</b>	<b>Report Due Date</b>	<b>Date 1<sup>st</sup> and 2<sup>nd</sup> Notice Mailed</b>	<b>Ex #</b>
2014 M5	5/1/14 – 5/31/14	6/10/14	6/11/14 <sup>1</sup>	5
2014 P1	6/1/14 – 6/20/14	6/27/14	6/30/14 and 7/16/14	6
2014 P1A	6/21/14 – 6/27/14	7/4/14	7/7/14 and 7/21/14	7

8. On July 8, 2014, Complainant mailed Respondent a certified letter marked "Final Notice" stating that Respondent's reports had not been filed (Table 1). This letter also included copies of the failure-to-file letters that were previously sent to Respondent. This letter was mailed to the address provided on the DS-DE 103 form (Exhibit 1). To review a copy of the "Final Notice" letter with delivery confirmation, refer to exhibit 8.

9. The allegations that Respondent failed to report campaign activity, or in the alternative, failed to notify the filing officer that no report would be filed during the reporting periods listed in Table 1 will be discussed in the following paragraphs.

## **II. Alleged Violation of Section 106.0703(6), Florida Statutes:**

10. I investigated whether Respondent violated this section of the election laws by failing to notify timely the filing officer, in writing, that no reportable contributions or expenditures were made during a reporting period and, therefore, no report would be filed on the prescribed reporting date.

11. I have subpoenaed depository records for this electioneering communications organization. Based upon a review of these records, it appears Respondent was not required to notify his filing officer in writing that no report would be filed for the 2014 M5, P1, and P1A reporting periods; there was activity during these reporting periods. It appears that Respondent

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<sup>1</sup> Respondent was not sent a second notice regarding the 2014 M5 Report.

was required to disclose these transactions by filing 2014 M5, P1, and P1A Reports.

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

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

13. 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 he failed to file treasurer's reports, or written notices to the filing officer that no reports would be filed due to the lack of reportable activity during the 2014 M5, P1, and P1A reporting periods, on the prescribed reporting dates.

14. I have subpoenaed depository records for this electioneering communications organization. A review of the depository records reflect that Respondent authorized check #1027 in the amount of \$3,000 00 to Anita Carbone for reasons unknown. The ECO's check was dated for May 21, 2014. This check was also deposited on May 21, 2014. This time period includes the 2014 M5 reporting period. To view a copy of check #1027, refer to exhibit 9.

15. A review of these records reflects that a \$12.00 maintenance fee from the depository was initiated on June 30, 2014.<sup>2</sup> This reoccurring fee is the only activity that occurred for Respondent's ECO during the months of June and July 2014. This time period includes the 2014 P1, and P1A reporting periods. To view a copy of the depository records that cover this time period, refer to exhibit 10.

16. According to the ECO's filing history, Respondent filed waivers for the 2014 M5, P1, and P1A reporting periods. These waivers were filed on December 9, 2014. Table 2 summarizes the reporting periods and dates the notifications were due and filed. To view copies of the 2014 M5, P1, and P1A waivers-of-report, refer to exhibits 11 through 13. To view a copy of the ECO's filing history, please refer to exhibit 14.

Table 2: Waiver of Report Due Dates/Filed Date					
Report	Report Cover Period	Waiver of Report Due Date	Waiver of Report Filed Date	Number of Days Late	Ex
2014 M5	5/1/14 – 5/31/14	6/10/14	12/9/14	182	11
2014 P1	6/1/14 – 6/20/14	6/27/14	12/9/14	165	12
2014 P1A	6/21/14 - 6/27/14	7/4/14	12/9/14	158	13

17. There is no record that Respondent has previously violated this section of the

<sup>2</sup> Shirley Gonzalez, depository representative, advised me that the \$12.00 maintenance fee is charged to Respondent's account every time the account goes under the minimum required balance of \$1,500 00 in a month's span. Respondent has a business account and these are the terms of these types of account

election laws.

#### IV. FEC HISTORY:

18. None

#### Conclusion:

19. In a final interview, Respondent advised me that the waivers for the 2014 M5, P1, and P1A reporting periods had all been filed. He reported that he did not have any activity during these reporting periods. He told me that this was his first-time serving on an ECO, and his first-time dabbling in politics. Mr. Peragine told me that he received all the publications from the DOE. He stated, "I don't have any other excuse for the late filings, besides I had too much on my plate".

20. In the September 4, 2012 acknowledgement letter, Respondent was informed that all of the Division's publications were 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, 2012 Electioneering Communications Organization Handbook, 2012 Calendar of Reporting Dates and Rule 1S-2.017, Florida Administrative Code**". To review a copy of the September 4, 2012 acknowledgement letter, refer to exhibit 3.

Respectfully submitted on March 9, 2015



Cedric Oliver  
Investigation Specialist

#### Current address of Respondent

Mr. Michael J Peragine, Treasurer  
Citizens for Ethical Leadership  
277 Sedona Way  
Palm Beach Gardens, FL 33418

#### Current address of Complainant

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

#### Name and Address of Filing Officer:

Ms. Kristi Reid-Bronson  
Chief of Bureau of Election Records  
500 South Bronough Street, Room 316  
Tallahassee, FL 32399

Copy furnished to: Mr. David Flagg, Investigations Manager

**FLORIDA ELECTIONS COMMISSION**  
**REPORT OF INVESTIGATION**  
**Citizens for Ethical Leadership -- FEC 14-284**

LIST OF EXHIBITS	
Exhibits #s	Description of Exhibits
Exhibit 1	DS-DE 103 Form
Exhibit 2	DS-DS 41 Form
Exhibit 3	September 4, 2012 Acknowledgement Letter
Exhibit 4	Sworn Affidavit from Complainant
Exhibit 5	2014 M5 Failure-to-File Notices
Exhibit 6	2014 P1 Failure-to-File Notices
Exhibit 7	2014 P1A Failure-to-File Notices
Exhibit 8	Final Notice with Delivery Confirmation
Exhibit 9	Check #1027
Exhibit 10	Depository Records
Exhibit 11	2014 M5 Report
Exhibit 12	2014 P1 Report
Exhibit 13	2014 P1A Report
Exhibit 14	Filing History

**ELECTIONEERING COMMUNICATION  
STATEMENT OF ORGANIZATION**

(PLEASE TYPE)

RECEIVED  
DEPARTMENT OF STATE

2012 AUG 30 AM 10:34

DIVISION OF ELECTIONS  
TALLAHASSEE, FL

OFFICE USE ONLY

**1. Full Name of Organization**

Citizens for Ethical Leadership

Telephone

(561) 342-1258

Mailing Address (include city state and zip code)

277 Sedona Way, Palm Beach Gardens FL 33418

Street Address (include city state and zip code)

277 Sedona Way, Palm Beach Gardens FL 33418

**2 Affiliated or Connected Organizations**

Name of Affiliated or Connected Organization	Mailing Address	Relationship
None		

**3. Area, Scope and Jurisdiction of the Organization**

Statewide, Legislative, Multicounty, Countywide, and Municipal Candidates

**4 Identify by Name, Address & Position, the Custodian of Books & Accounts for the Organization**

Full Name	Mailing Address	Street Address	Title or Position
Michael J Peragine	277 Sedona Way, Palm Beach Gardens FL 33418	277 Sedona Way, Palm Beach Gardens FL 33418	Chairperson/Treasurer

**5 This Organization was formed (check applicable box): (Calendar quarters end the last day of March, June, September, and December.)**

☒ As a newly created organization during the current calendar quarter

☐ From an organization existing prior to the current calendar quarter

**6 List By Name, Mailing and Street Address, & Position, Other Principal Officers, including the treasurer and deputy treasurer, if any. Include the top-ranking officer's (e.g., chairperson) name and information.**

Full Name	Mailing Address	Street Address	Title or Position
Michael J. Peragine	277 Sedona Way, Palm Beach Gardens, FL 33418	277 Sedona Way, Palm Beach Gardens, FL 33418	Chairperson/Treasurer

**7. In the Event of Dissolution, What Disposition will be Made of the Residual Funds?**

Pro Rata to Contributors

**8 List All Banks, Safety Deposit Boxes, or Other Depositories Used by this Organization for Electioneering Communications**

Name of Bank or Depository	Mailing Address
SunTrust Banks Inc	501 South Flagler Drive West Palm Beach, FL 33401

**9. List All Reports Required to be Filed by this Organization with Federal Officials, & the Names, Addresses, & Positions of Such Officials, If Any**

Report Title	Dates Required to be Filed	Name & Position of Official	Mailing Address
Form 8871 Form 990	Upon Organization Annually April	IRS IRS	Ogden UT 84201

STATE OF Florida Palm Beach COUNTY

Michael J. Peragine certify that the information in this Statement of


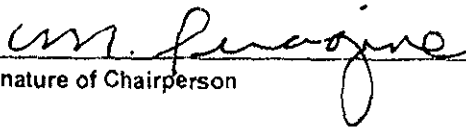
Organization is complete true and correct

**X** Michael J. Peragine  
Signature of Top-ranking Principal Officer of Organization

July 30, 2012

Date

EXHIBIT 1 (2 of 2)

<b>REGISTERED AGENT STATEMENT OF APPOINTMENT</b> (Section 106.022 F.S.)		<div style="text-align: right;"> <b>RECEIVED</b>          DEPARTMENT OF STATE          OFFICE ONLY       </div> <div style="text-align: center; font-size: 1.2em;">         2012 AUG 30 AM 10:34       </div> <div style="text-align: center;">         DIVISION OF ELECTIONS          TALLAHASSEE, FL       </div>	
<input checked="" type="checkbox"/> Original Appointment <input type="checkbox"/> Change of Appointment <input type="checkbox"/> Change of Mailing Address <input type="checkbox"/> Change of Physical Address			
<b>Registered Agent and Office Information</b>			
Name Michael J. Peragine		Telephone (561)342-1258	
Street Address 277 Sedona Way			
City Palm Beach Gardens	State FL	Zip Code 33418	
Mailing Address 277 Sedona Way			
City Palm Beach Gardens	State FL	Zip Code 33418	
I accept this appointment and confirm that I am familiar with and accept the obligations of the position as set forth in Section 106.022 F.S. I also understand that I may resign this appointment by executing a written statement of resignation and filing it with the applicable filing officer.			
 Signature of Registered Agent		July 30, 2012 Date	
<b>Former Registered Agent and Office Information (for changes only)</b>			
Name		Telephone	
Street Address			
City	State	Zip Code	
<b>Committee or Organization Information</b>			
Name of Committee or Organization Citizens for Ethical Leadership			
Street Address 277 Sedona Way		Telephone (561)342-1258	
City Palm Beach Gardens	State FL	Zip Code 33418	
 Signature of Chairperson			
Michael J. Peragine Printed Name of Chairperson		July 30, 2012 Date	

Form DS-DE 41 (revised 6/11)

EXHIBIT

2 (1 of 2)

**Citizens for Ethical Leadership**

277 Sedona Way

Palm Beach Gardens, FL 33418

RECEIVED  
DEPARTMENT OF STATE

2012 AUG 30 AM 10:34

DIVISION OF ELECTIONS  
TALLAHASSEE, FL

July 31, 2012

Via FedEx

Department of State  
Division of Elections  
Director's Office  
Room 316, R. A. Gray Building  
500 South Bronough Street  
Tallahassee, FL 32399-0250

RE: Citizens for Ethical Leadership Filing

Dear Filing Officer:

Please find enclosed documents for the newly formed Electioneering Communication Organization Citizens for Ethical Leadership, including DS-DE 103 and DS-DE 41. If you require any further documentation or have questions, please contact the ECO's attorney at 561.702.6649.

Sincerely,



Michael J. Peragine  
Chairperson

Enclosure

EXHIBIT

2(aof2)



## FLORIDA DEPARTMENT of STATE

**RICK SCOTT**  
Governor

**KEN DETZNER**  
Secretary of State

September 4, 2012

Mr. Michael J. Peragine, Chairperson  
Citizens for Ethical Leadership  
277 Sedona Way  
Palm Beach Gardens, Florida 33418

Dear Mr. Peragine:

This will acknowledge receipt of the Application for Certification for **Citizens for Ethical Leadership**, which was placed on file in our office on August 30, 2012. This information appears to comply with the requirements of Section 106.011 and 106.03, Florida Statutes. The name of this organization has been placed on our active list as an electioneering communications organization.

### Campaign Treasurer's Reports

Your first campaign treasurer's report will be due on **September 21, 2012**. The report will cover the period of August 10, 2012 - September 14, 2012. All electioneering communications organizations that file reports with the Division of Elections are required to file by means of the Division's electronic filing system (EFS).

### Credentials and Sign-ons

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

EFS Web site Address: <https://efs.dos.state.fl.us>  
Identification Number: 60013



R. A. Gray Building • 500 South Bronough Street • Tallahassee, Florida 32399-0250  
Telephone: (850) 245-6240 • Facsimile: (850) 245-6259 [www.dos.state.fl.us](http://www.dos.state.fl.us)  
Commemorating 500 years of Florida history [www.fl500.com](http://www.fl500.com)



EXHIBIT 3(1043)

Mr. Michael J. Peragine, Chairperson  
September 4, 2012  
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 electioneering communications organization chairperson is required to provide the Division of Elections with confidential personal information that may be used to allow access in the event that the password is forgotten or lost. When you enter the organization's account screen, there will be a drop down box where you pick a question (such as *What is your mother's maiden name?*) and supply an answer. All passwords and answers to questions are stored as encrypted data and cannot be viewed by Division staff and given out over the phone. Please notify the Division if your credentials have been compromised.

### Timely Filing

All reports must be completed and filed through the EFS not later than midnight, Eastern Standard Time (EST), of the due date. Reports not filed by midnight, EST, of the due date are late filed and subject to the penalties in Section 106.0703(7), 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, EST, of the first business day the EFS becomes operable. No fine will be levied during the period the EFS was inoperable.

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

### Electronic Receipts

The person submitting the report on the EFS will be issued an electronic receipt indicating and verifying the report was filed. Each treasurer's report filed by means of the EFS is considered to be under oath by the campaign treasurer and such persons are subject to the provisions of Section 106.0703(4), Florida Statutes.

EXHIBIT 3(2 of 3)

Mr. Michael J. Peragino, Chairperson  
September 4, 2012  
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' web site at <http://elections.myflorida.com>. It is your responsibility to read, understand, and follow the requirements of Florida's election laws. Therefore, please print a copy of the following documents: Chapters 104 and 106, Florida Statutes, 2012 *Electioneering Communications Organization Handbook*, 2012 *Calendar of Reporting Dates* and Rule 1S-2.017, Florida Administrative Code.

Please let me know if you need additional information

Sincerely,

*Erin DeSmith*

*for* Kristi Reid Bronson, Chief  
Bureau of Election Records

KRB/ljr

Enclosures

EXHIBIT 3(3043)

## AFFIDAVIT

STATE OF FLORIDA

County of Leon

Kristi Reid Bronson, 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. Citizens for Ethical Leadership (60013) is an electioneering communications organization registered with the Division. On August 30, 2012, Mr. Michael J. Peragine filed the DSDE 41 and 103 with the Division of Elections indicating that Mr. Peragine was the chairperson and treasurer for the organization (See attached documents and acknowledgment letter )
5. The 2014 M5 campaign treasurer's report was due on June 10, 2014. At the time the 2014 M5 report was due, Mr. Peragine was the treasurer.
6. On June 11, 2014, the Division mailed Mr. Peragine notifications that the 2014 M5 campaign treasurer's report had not been filed. (See attached letter).
7. The 2014 P1 campaign treasurer's report was due on June 27, 2014. At the time the 2014 P1 report was due, Mr. Peragine was the treasurer. (See attached letter).
8. On June 30, 2014, the Division mailed Mr. Peragine notifications that the 2014 P1 campaign treasurer's report had not been filed. (See attached letter).
9. On July 16, 2014, the Division mailed Mr. Peragine notifications that the 2014 P1 campaign treasurer's report had not been filed. (See attached letter).

EXHIBIT

4(10/2)

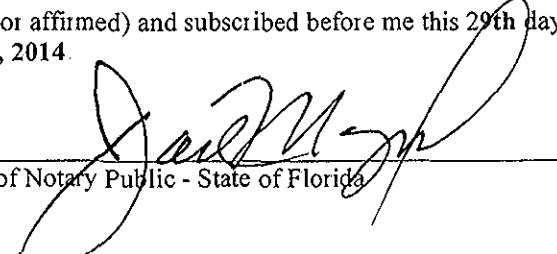
000002

10. The 2014 P1A campaign treasurer's report was due on July 4, 2014. At the time the 2014 P1A report was due, Mr. Peragine was the treasurer.
11. On July 7, 2014, the Division mailed Mr. Peragine notifications that the 2014 P1A campaign treasurer's report had not been filed. (See attached letter).
12. On July 21, 2014, the Division mailed Mr. Peragine notifications that the 2014 P1A campaign treasurer's report had not been filed. (See attached letter).
13. On July 8, 2014, the Division mailed Mr. Peragine final notification with delivery confirmation that the 2014 M5, 2014 P1, and 2014 P1A reports had not been filed. (See attached letter with delivery confirmation).
14. As of August 29, 2014, Citizens for Ethical Leadership has failed to file the 2014 M5, 2014 P1, and 2014 P1A 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 29<sup>th</sup> day  
of August, 2014.

  
\_\_\_\_\_  
Signature of Notary Public - State of Florida

Print, Type, or Stamp Commissioned Name of Notary  
Public

Personally Known ☒



EXHIBIT

4(aof2)

000003



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

June 11, 2014

Michael J. Peragine, Treasurer  
Citizens for Ethical Leadership  
277 Sedona Way  
Palm Beach Gardens, FL 33418-3418

Re: ECO 60013

Dear Mr. Peragine:

Your campaign treasurer's report, which was due June 10, 2014, has not been received.

Sections 106.0703(7)(b), Florida Statutes, require that the filing officer immediately notify you of the failure to file this report and that a fine will be assessed of \$50 per day for the first 3 days late and, thereafter \$500 per day, although a fine cannot exceed 25% of the total receipts or expenditures, whichever is greater, for the period covered by the late report. However, for the report 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.

Once your report is filed, this office will notify you of the specific amount of your fine. Fines must be paid to the filing officer within 20 days of receipt of the payment due notice.

Please be advised, however, that failure to file a campaign treasurer's report may constitute a violation of Chapter 106, Florida Statutes, independent of the automatic fine violation referenced above. Therefore, if you fail to file a report, the division will turn the matter over to the Florida Elections Commission.

Section 106.265(1), Florida Statutes, authorizes the Florida Elections Commission, to impose a civil penalty up to \$1,000 per count for each willful violation of Chapter 106.

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



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

June 30, 2014

Michael J. Peragine, Treasurer  
Citizens for Ethical Leadership  
277 Sedona Way  
Palm Beach Gardens, FL 33418-3418

Re: ECO 60013

Dear Mr. Peragine:

Your campaign treasurer's report, which was due June 27, 2014, has not been received.

Sections 106.0703(7)(b), Florida Statutes, require that the filing officer immediately notify you of the failure to file this report and that a fine will be assessed of \$50 per day for the first 3 days late and, thereafter \$500 per day, although a fine cannot exceed 25% of the total receipts or expenditures, whichever is greater, for the period covered by the late report. However, for the report 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.

Once your report is filed, this office will notify you of the specific amount of your fine. Fines must be paid to the filing officer within 20 days of receipt of the payment due notice.

Please be advised, however, that failure to file a campaign treasurer's report may constitute a violation of Chapter 106, Florida Statutes, independent of the automatic fine violation referenced above. Therefore, if you fail to file a report, the division will turn the matter over to the Florida Elections Commission.

Section 106.265(1), Florida Statutes, authorizes the Florida Elections Commission, to impose a civil penalty up to \$1,000 per count for each willful violation of Chapter 106.

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

Sincerely,

Kristi Reid Bronson, Chief  
Bureau of Election Records

EXHIBIT 6(1042)



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

**Second Notice**

July 16, 2014

Michael J. Peragine, Treasurer  
Citizens for Ethical Leadership  
277 Sedona Way  
Palm Beach Gardens, FL 33418-3418

Re: ECO 60013

Dear Mr. Peragine:

Your campaign treasurer's report, due June 27, 2014, has not been received.

Sections 106.0703(7)(b), Florida Statutes, require that the filing officer immediately notify you of the failure to file a report.

The first notice of the failure to file the above mentioned report was mailed, via regular mail, to the address on file with our office on June 30, 2014. As of this date, we do not show a record of receiving this report.

If the report is not filed via the Division's electronic filing system within 14 days of receipt of this notice, this matter will be referred to the Florida Elections Commission for further action. Section 106.265(1), Florida Statutes, authorizes the Florida Elections Commission, upon finding a willful violation of Chapter 106, Florida Statutes, to impose a civil penalty up to \$1,000 per

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

6(aof 2)



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

July 7, 2014

Michael J. Peragine, Treasurer  
Citizens for Ethical Leadership  
277 Sedona Way  
Palm Beach Gardens, FL 33418-3418

Re: ECO 60013

Dear Mr. Peragine:

Your campaign treasurer's report, which was due July 4, 2014, has not been received

Sections 106.0703(7)(b), Florida Statutes, require that the filing officer immediately notify you of the failure to file this report and that a fine will be assessed of \$50 per day for the first 3 days late and, thereafter \$500 per day, although a fine cannot exceed 25% of the total receipts or expenditures, whichever is greater, for the period covered by the late report. However, for the report 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

Once your report is filed, this office will notify you of the specific amount of your fine. Fines must be paid to the filing officer within 20 days of receipt of the payment due notice.

Please be advised, however, that failure to file a campaign treasurer's report may constitute a violation of Chapter 106, Florida Statutes, independent of the automatic fine violation referenced above. Therefore, if you fail to file a report, the division will turn the matter over to the Florida Elections Commission.

Section 106.265(1), Florida Statutes, authorizes the Florida Elections Commission, to impose a civil penalty up to \$1,000 per count for each willful violation of Chapter 106.

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

Sincerely,

Kristi Reid Bronson, Chief  
Bureau of Election Records

EXHIBIT

7(1042)



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

**Second Notice**

July 21, 2014

Michael J. Peragine, Treasurer  
Citizens for Ethical Leadership  
277 Sedona Way  
Palm Beach Gardens, FL 33418-3418

Re: ECO 60013

Dear Mr. Peragine:

Your campaign treasurer's report, due July 4, 2014, has not been received.

Sections 106.0703(7)(b), Florida Statutes, require that the filing officer immediately notify you of the failure to file a report

The first notice of the failure to file the above mentioned report was mailed, via regular mail, to the address on file with our office on July 7, 2014. As of this date, we do not show a record of receiving this report

If the report is not filed via the Division's electronic filing system within 14 days of receipt of this notice, this matter will be referred to the Florida Elections Commission for further action. Section 106.265(1), Florida Statutes, authorizes the Florida Elections Commission, upon finding a willful violation of Chapter 106, Florida Statutes, to impose a civil penalty up to \$1,000 per

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

Sincerely,

Kristi Reid Bronson, Chief  
Bureau of Election Records

EXHIBIT

7(2012)



## FLORIDA DEPARTMENT of STATE

**RICK SCOTT**  
Governor

**KEN DETZNER**  
Secretary of State

### **FINAL NOTICE**

**Delivery Confirmation:**

USPS TRACKING # **9114 9010 7574 2751 2918 30**  
& CUSTOMER RECEIPT For Tracking or inquiries go to USPS.com  
or call 1-800-222-1811

July 8, 2014

Michael J. Peragine, Treasurer  
Citizens for Ethical Leadership (60013)  
277 Sedona Way  
Palm Beach Gardens, FL 33418

Dear Mr. Peragine:

According to a review of the Division's records, the organization referenced above has not filed the following reports:

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2014	M5	05/01/2014 - 05/31/2014
2014	P1	06/01/2014 - 06/20/2014
2014	P1A	06/21/2014 - 06/27/2014

The organization has previously been notified of the reports that are outstanding. Enclosed are copies of letters sent by the Division. If the reports are not filed **within 7 days of receipt of this letter**, the Division will forward this matter to the Florida Elections Commission for further action. Section 106.265(1), Florida Statutes, authorizes the Florida Elections Commission to impose civil penalties of up to \$1,000 per violation.

If you have any questions, please call the help desk at (850) 245-6240.

Sincerely,

Kristi Reid Bronson, Chief  
Bureau of Election Records

KRB/dsb

Enclosure

**EXHIBIT**

*8 (1 of 2)*

Division of Elections

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

850.245.6200 • 850.245.6217 (Fax) [election.dos.state.fl.us](http://election.dos.state.fl.us)

Promoting Florida's History and Culture [VivaFlorida.org](http://VivaFlorida.org)



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[Customer Service >](#)  
Have questions? We're here to help.

Tracking Number: 9114901075742751291830

## Product &amp; Tracking Information

Postal Product:

Features:  
USPS Tracking™

## Available Actions

DATE & TIME	STATUS OF ITEM	LOCATION
July 11 2014, 9:31 am	Delivered	PALM BEACH GARDENS FL 33418
Your item was delivered at 9:31 am on July 11 2014 in PALM BEACH GARDENS FL 33418		
July 11 2014 6:55 am	Arrived at Post Office	PALM BEACH GARDENS FL 33410
July 11 2014 4:05 am	Departed USPS Facility	WEST PALM BEACH FL 33416
July 11 2014 2:44 am	Arrived at USPS Facility	WEST PALM BEACH FL 33416
July 10 2014 3:16 am	Departed USPS Facility	TALLAHASSEE FL 32301
July 9 2014 10:27 pm	Arrived at USPS Facility	TALLAHASSEE FL 32301

## Track Another Package

What's your tracking (or receipt) number?

[Track It](#)

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EXHIBIT 8(aaf2)

000017

STSC  
SUBPOENA SERVICES  
FL-ORLANDO-7136

COPY REFERENCE: 20150223000157 SS  
02/24/15 09:48:20 1 WEB JOBT50224094758  
0076021084 20140522 07  
3000.00 000000

1027

CITIZENS FOR ETHICAL LEADERSHIP

Check or Money Order  
Payable to the Order of  
63-215-631

DATE 5-21-14

PAY TO  
THE ORDER OF

Anita Carbone

\$ 3000.00

Three Thousand Exactly

DOLLARS

VOID AFTER 60 DAYS



ACH RT 061000104

FOR

Mr. Perazzo

Velocity Community CU

BOFD RT: 267083271

05/21/2014 01:55:16 (-04:00) PM

Account

Item: 248223711232

Anita Carbone

EXHIBIT 9

SUNTRUST BANK  
PO BOX 305183  
NASHVILLE TN 37230-5183

# SUNTRUST

PAGE 1 OF 1  
36/EOO/0175/0/ 40  
[REDACTED]  
05/31/2014

ACCOUNT  
STATEMENT

CITIZENS FOR ETHICAL LEADERSHIP  
ECO ACCOUNT  
277 SEDONA WAY  
PALM BEACH GARDENS FL 33418-1718

QUESTIONS? PLEASE CALL  
1-800-786-8787

A SUNTRUST ACCESS 3 EQUITY LINE OF CREDIT IS A SMART, FLEXIBLE AND AFFORDABLE WAY TO USE YOUR HOME'S EQUITY TO PAY FOR THE IMPORTANT THINGS IN YOUR LIFE, AND NOW YOU CAN TAKE ADVANTAGE OF OUR NEW SPECIAL LOW RATES. CALL 877.501.5655, VISIT SUNTRUST.COM/EQUITYLINE, OR STOP BY A LOCAL SUNTRUST BRANCH TO APPLY.

-----  
ACCOUNT SUMMARY  
ACCOUNT TYPE ACCOUNT NUMBER STATEMENT PERIOD  
PRIMARY BUSINESS CHECKING [REDACTED] 05/01/2014 - 05/31/2014  
-----

DESCRIPTION	AMOUNT	DESCRIPTION	AMOUNT
BEGINNING BALANCE	\$4,106.23	AVERAGE BALANCE	\$3,138.48
DEPOSITS/CREDITS	\$ .00	AVERAGE COLLECTED BALANCE	\$3,138.48
CHECKS	\$3,000.00	NUMBER OF DAYS IN STATEMENT PERIOD	31
WITHDRAWALS/DEBITS	\$ .00		
ENDING BALANCE	\$1,106.23		

-----

CHECKS			
CHECK NUMBER	AMOUNT	DATE PAID	CHECK NUMBER
1027	3,000.00	05/22	

CHECKS: 1

-----

BALANCE ACTIVITY HISTORY					
DATE	BALANCE	COLLECTED	DATE	BALANCE	COLLECTED
		BALANCE			BALANCE
05/01	4,106.23	4,106.23	05/22	1,106.23	1,106.23

MEMBER FDIC

EXHIBIT 10 (1 of 3)

SUNTRUST BANK  
PO BOX 305183  
NASHVILLE TN 37230-5183

**SUNTRUST**

PAGE 1 OF 1  
66/E00/0175/0/ 40  
[REDACTED]  
06/30/2014

ACCOUNT  
STATEMENT

CITIZENS FOR ETHICAL LEADERSHIP  
ECO ACCOUNT  
277 SEDONA WAY  
PALM BEACH GARDENS FL 33418-1718

QUESTIONS? PLEASE CALL  
1-800-786-8787

HOW CAN WE HELP YOU MAKE THE RIGHT FINANCIAL CHOICES FOR TODAY AND TOMORROW?  
WITH OUR VARIETY OF SOLUTIONS AND FINANCIAL GUIDANCE.  
WE VALUE YOU AS A CLIENT AND WANT TO HELP YOU BANK THE WAY THAT FITS YOUR LIFE.  
LEARN MORE AT [SUNTRUST.COM](http://SUNTRUST.COM).

-----  
ACCOUNT SUMMARY  
ACCOUNT TYPE ACCOUNT NUMBER STATEMENT PERIOD  
PRIMARY BUSINESS CHECKING [REDACTED] 06/01/2014 - 06/30/2014  
-----

DESCRIPTION	AMOUNT	DESCRIPTION	AMOUNT
BEGINNING BALANCE	\$1,106.23	AVERAGE BALANCE	\$1,105.83
DEPOSITS/CREDITS	\$ .00	AVERAGE COLLECTED BALANCE	\$1,105.83
CHECKS	\$ .00	NUMBER OF DAYS IN STATEMENT PERIOD	30
WITHDRAWALS/DEBITS	\$12.00		
ENDING BALANCE	\$1,094.23		

-----

DATE	AMOUNT	SERIAL #	WITHDRAWALS/DEBITS DESCRIPTION
06/30	12.00		MAINTENANCE FEE

WITHDRAWALS/DEBITS: 1

-----

BALANCE ACTIVITY HISTORY				
DATE	BALANCE	COLLECTED	DATE	BALANCE
06/01	1,106.23	1,106.23	06/30	1,094.23

-----

MEMBER FDIC

EXHIBIT 10(8 of 3)

SUNTRUST BANK  
PO BOX 305183  
NASHVILLE TN 37230-5183

**SUNTRUST**

PAGE 1 OF 1  
66/E00/0175/O/ 40  
[REDACTED]  
07/31/2014

ACCOUNT  
STATEMENT

CITIZENS FOR ETHICAL LEADERSHIP  
ECO ACCOUNT  
277 SEDONA WAY  
PALM BEACH GARDENS FL 33418-1718

QUESTIONS? PLEASE CALL  
1-800-786-8787

EFFECTIVE SEPTEMBER 1, 2014, THE DEPOSITED ITEM RETURNED FEE WILL INCREASE  
TO \$12.50 PER ITEM AND WILL BE CHARGED TO YOUR ACCOUNT AS THEY OCCUR.

-----  
ACCOUNT SUMMARY  
ACCOUNT TYPE                      ACCOUNT NUMBER                      STATEMENT PERIOD  
PRIMARY BUSINESS CHECKING                      [REDACTED]                      07/01/2014 - 07/31/2014  
-----

DESCRIPTION	AMOUNT	DESCRIPTION	AMOUNT
BEGINNING BALANCE	\$1,094.23	AVERAGE BALANCE	\$1,093.84
DEPOSITS/CREDITS	\$ .00	AVERAGE COLLECTED BALANCE	\$1,093.84
CHECKS	\$ .00	NUMBER OF DAYS IN STATEMENT PERIOD	31
WITHDRAWALS/DEBITS	\$12.00		
ENDING BALANCE	\$1,082.23		

-----

WITHDRAWALS/DEBITS  
DATE                      AMOUNT      SERIAL #                      DESCRIPTION  
07/31                      12.00                      MAINTENANCE FEE

WITHDRAWALS/DEBITS: 1

-----  
BALANCE ACTIVITY HISTORY  
DATE                      BALANCE                      COLLECTED DATE                      BALANCE                      COLLECTED  
07/01                      1,094.23                      1,094.23      07/31                      1,082.23                      1,082.23  
-----

MEMBER FDIC

EXHIBIT 10(3 of 3)

2/18/2015

## Filed Campaign Treasurer's Report

Page 1

Citizens for Ethical Leadership  
60013 - ECO

Elect ID: 20141104-GEN

From: 5/1/2014

Amd: N

Wvr: Y

Filed: FIL 12/9/2014 2:57:02 P

Report: 2014 M5 (43)

To: 5/31/2014

Cmpit: NOD

Reviewed: AUD 12/9/2014 2:56:53 P

Original Report

Submitted: 12/9/2014 2:57:02 P

EXHIBIT

11 (1 of 2)

2/18/2015

## Filed Campaign Treasurer's Report

Page 2

Citizens for Ethical Leadership  
60013 - ECO

Elect ID: 20141104-GEN  
Report: 2014 M5 (43)

From: 5/1/2014    Amd: N    Wvr: Y    Filed: FIL 12/9/2014 2:57:02 P  
To: 5/31/2014    Cmpl: NOD    Reviewed: AUD 12/9/2014 2:56:53 P

EXHIBIT

11 (2 of 2)

2/18/2015

## Filed Campaign Treasurer's Report

Page 1

Citizens for Ethical Leadership  
60013 - ECO

Elect ID: 20141104-GEN

From: 6/1/2014

Amd: N

Wvr: Y

Filed: FIL 12/9/2014 2:57:52 P

Report: 2014 P1 (44)

To: 6/20/2014

Cmplt: NOD

Reviewed: AUD 12/9/2014 2:57:43 P

Original Report

Submitted: 12/9/2014 2:57:52 P

EXHIBIT 12(1042)

2/18/2015

## Filed Campaign Treasurer's Report

Page 2

Citizens for Ethical Leadership  
60013 - ECO

Elect ID: 20141104-GEN

From: 6/1/2014

Amd: N

Wvr: Y

Filed: FIL 12/9/2014 2:57:52 P

Report: 2014 P1 (44)

To: 6/20/2014

Cmplt: NOD

Reviewed: AUD 12/9/2014 2:57:43 P

EXHIBIT 12(a)(2)

2/18/2015

## Filed Campaign Treasurer's Report

Page 1

Citizens for Ethical Leadership  
60013 - ECO

Elect ID: 20141104-GEN

From: 6/21/2014

Amd: N

Wvr: Y

Filed: FIL 12/9/2014 2:58:20 P

Report: 2014 P1A (45)

To: 6/27/2014

Cmplt: NOD

Reviewed: AUD 12/9/2014 2:58:11 P

Original Report

Submitted: 12/9/2014 2:58:20 P

EXHIBIT 13(102)

2/18/2015

## Filed Campaign Treasurer's Report

Page 2

Citizens for Ethical Leadership  
60013 - ECO

Elect ID: 20141104-GEN  
Report: 2014 P1A (45)

From: 6/21/2014  
To: 6/27/2014

Amd: N  
Wvr: Y  
Cmplt: NOD

Filed: FIL 12/9/2014 2:58:20 P  
Reviewed: AUD 12/9/2014 2:58:11 P

EXHIBIT 13(2 of 2)

## Queued Items for 2014-M5

Account: 60013

Citizens for Ethical Leadership

Rpt Seq: 43

<i>ProcessDescription</i>	<i>Status</i>	<i>Submitter</i>	<i>Created</i>	<i>LastUpdate</i>
Create Pending Report	Processing Complete	60013	12/9/2014 2:56:51 PM	12/9/2014 2:56:51 PM
Review Pending Report	Processing Complete	60013	12/9/2014 2:56:53 PM	12/9/2014 2:56:53 PM
File Pending Report	Processing Complete	60013	12/9/2014 2:57:02 PM	12/9/2014 2:57:02 PM

EXHIBIT 14(1045)

## Queued Items for 2014-P1

Account: 60013

Citizens for Ethical Leadership

Rpt Seq: 44

<i>ProcessDescription</i>	<i>Status</i>	<i>Submitter</i>	<i>Created</i>	<i>LastUpdate</i>
Create Pending Report	Processing Complete	60013	12/9/2014 2:57:39 PM	12/9/2014 2:57:39 PM
Review Pending Report	Processing Complete	60013	12/9/2014 2:57:43 PM	12/9/2014 2:57:43 PM
File Pending Report	Processing Complete	60013	12/9/2014 2:57:52 PM	12/9/2014 2:57:52 PM

EXHIBIT 14(2 of 5)

**Queued Items for 2014-P1A**

Account: 60013

**Citizens for Ethical Leadership**

Rpt Seq: 45

<i>ProcessDescription</i>	<i>Status</i>	<i>Submitter</i>	<i>Created</i>	<i>LastUpdate</i>
Create Pending Report	Processing Complete	60013	12/9/2014 2:58:08 PM	12/9/2014 2:58:08 PM
Review Pending Report	Processing Complete	60013	12/9/2014 2:58:11 PM	12/9/2014 2:58:11 PM
File Pending Report	Processing Complete	60013	12/9/2014 2:58:20 PM	12/9/2014 2:58:20 PM

**EXHIBIT** 14 (3 of 5)



search | directory | contact us | 411 | subscribe | tour | help

## Florida Department of State - Division of Elections

### Florida Election System Reports

Candidate/Committee Lookup

Name:

Election:

Acct:

Type:

Electioneering  
Comm Name: Citizens for Ethical Leadership

Account: 60013

Date Due	Type	Date Filed	Status	Days Late	Fine Assessed	Appealed	Amount Fined	Amount Paid
2/10/2015	M1	2/10/2015						
1/12/2015	M12	1/10/2015						
12/10/2014	M11	12/9/2014						
11/10/2014	M10	11/5/2014						
11/3/2014	D10	11/5/2014	FEC	2	\$0 00		\$0 00	\$0 00
11/2/2014	D9	11/3/2014	FEC	1	\$0 00		\$0 00	\$0 00
11/1/2014	D8	11/1/2014						
10/31/2014	G7	10/31/2014						
10/30/2014	D6	10/30/2014						
10/29/2014	D5	10/28/2014						
10/28/2014	D4	10/28/2014						
10/27/2014	D3	10/26/2014						
10/26/2014	D2	10/26/2014						
10/25/2014	D1	10/24/2014						
10/24/2014	G6	10/21/2014						
10/17/2014	G5	10/17/2014						
10/10/2014	G4	10/7/2014						
10/3/2014	G3	9/30/2014						
9/26/2014	G2A	9/26/2014						
9/19/2014	G2	9/20/2014	FEC	1	\$0 00		\$0 00	\$0 00
9/12/2014	G1A	9/9/2014						
9/5/2014	G1	9/5/2014						
8/29/2014	P7A	12/9/2014	FEC	102	\$0 00		\$0 00	\$0 00
8/22/2014	P7	8/30/2014	FEC	8	\$0 00		\$0 00	\$0 00
8/15/2014	P6	8/12/2014						
8/8/2014	P5	8/8/2014						
8/1/2014	P4	7/30/2014						
7/25/2014	P3	7/25/2014						
7/18/2014	P2A	7/18/2014						
7/11/2014	P2	7/11/2014						
7/4/2014	P1A	12/9/2014	FEC	158	\$0 00		\$0 00	\$0 00
6/27/2014	P1	12/9/2014	FEC	165	\$0 00		\$0 00	\$0 00
6/10/2014	M5	12/9/2014	FEC	182	\$0 00		\$0 00	\$0 00
5/12/2014	M4	5/13/2014	FEC	1	\$0 00		\$0 00	\$0 00
4/10/2014	M3	4/11/2014	FEC	1	\$0 00		\$0 00	\$0 00
3/10/2014	M2	3/13/2014	FEC	3	\$0 00		\$0 00	\$0 00
2/10/2014	M1	2/11/2014	FEC	1	\$0 00		\$0 00	\$0 00
1/10/2014	M12	1/10/2014						
12/10/2013	M11	12/10/2013						
11/12/2013	M10	11/12/2013						
10/10/2013	Q3	10/10/2013						
7/10/2013	Q2	7/10/2013						
4/10/2013	Q1	4/10/2013						
1/10/2013	Q4	1/10/2013						

EXHIBIT 14(4 of 5)

11/2/2012 G4 11/2/2012

10/19/2012 G3 10/19/2012

10/5/2012 G2 10/5/2012

9/21/2012 G1 9/21/2012

EXHIBIT 14(5045)



## FLORIDA ELECTIONS COMMISSION

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

October 7, 2014

Michael J. Peragine, Treasurer  
Citizens for Ethical Leadership  
277 Sedona Way  
Palm Beach Gardens, FL 33418

**RE: Case No.: FEC 14-284; Respondent: Michael J. Peragine, in his capacity as treasurer for Citizens for Ethical Leadership**

Dear Mr. Peragine:

On September 2, 2014, 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 106.0703(6), Florida Statutes:** As alleged in the complaint, Respondent, Michael J. Peragine, is the treasurer for Citizens for Ethical Leadership, an electioneering communications organization (ECO) registered with the Division of Elections. Respondent failed to timely notify the filing officer that the ECO had no reportable activity and, therefore, would not be filing reports on the prescribed reporting date for each of the following reporting periods:

- 2014 M5
- 2014 P1
- 2014 P1A

**Section 106.19(1)(c), Florida Statutes:** As alleged in the complaint, Respondent, Michael J. Peragine, is the treasurer for Citizens for Ethical Leadership, an electioneering communications organization (ECO) registered with the Division of Elections. Respondent falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, when he

failed to file reports on the prescribed reporting date for each of the following reporting periods:

- 2014 M5
- 2014 P1
- 2014 P1A

You may respond to the allegations above by filing a notarized statement providing any information regarding the facts and circumstances surrounding the allegations. Your response will be included as an attachment to the investigator's report.

When we conclude the investigation, a copy of the Report of Investigation will be mailed to you at the above address. You may file a response to the report within 14 days from the date the report is mailed to you. Based on the results of the investigation, legal staff will make a written recommendation to the Commission on whether there is probable cause to believe you have violated Chapter 104 or 106, Florida Statutes. A copy of the Staff Recommendation will be mailed to you and you may file a response within 14 days from the date the recommendation is mailed to you. Your timely filed response(s) will be considered by the Commission when determining probable cause.

The Commission will then hold a hearing to determine whether there is probable cause to believe you have violated Chapters 104 or 106, Florida Statutes. You and the complainant will receive a notice of hearing at least 14 days before the hearing. The notice of hearing will indicate the location, date, and time of your hearing. You will have the opportunity to make a brief oral statement to the Commission, but you will not be permitted to testify or call others to testify, or introduce any documentary or other evidence.

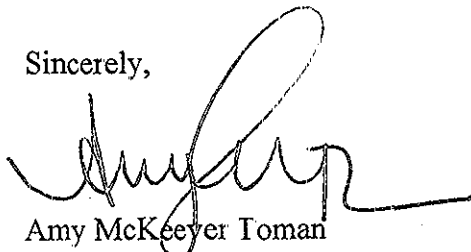
At any time before a probable cause finding, you may notify us in writing that you want to enter into negotiations directed towards reaching a settlement via consent agreement.

**The Report of Investigation, Staff Recommendation, and Notice of Hearing will be mailed to the above address as this letter. Therefore, if your address changes, you must notify this office of your new address. Otherwise, you may not receive these important documents. Failure to receive the documents will not delay the probable cause hearing.**

Under section 106.25, Florida Statutes, complaints, Commission investigations, investigative reports, and other documents relating to an alleged violation of Chapters 104 and 106, Florida Statutes, are confidential until the Commission finds probable cause or no probable cause. The confidentiality provision does not apply to the person filing the complaint. However, it does apply to you unless you waive confidentiality in writing. The confidentiality provision does not preclude you from seeking legal counsel. However, if you retain counsel, your attorney must file a notice of appearance with the Commission before any member of the Commission staff can discuss this case with him or her.

If you have any questions or need additional information, please contact **Cedric Oliver**, the investigator assigned to this case.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amy Toman', with a long horizontal flourish extending to the right.

Amy McKeever Toman  
Executive Director

AMI/enr

14-284

Received in  
FEC 9/2/14  
ER

**DIVISION OF ELECTIONS  
FEC REFERRAL FORM**

To FEC from Division of Elections

---

---

**Name:** Citizens for Ethical Leadership

**Account Number:** 60013

**Chairperson:** Michael J. Peragine

**Treasurer:** Michael J. Peragine

**Registered Agent:** Michael J. Peragine

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The Division of Elections is referring this issue to the Florida Elections Commission pursuant to Sections 106.25, Section 106.07(8)(d), and 106.19(1)(c), Florida Statutes. Section 106.07(8)(d) Florida Statutes, requires the filing officer to notify the FEC of a political committees alleged failure to file reports as set forth in the notification.

In the alternative, Mr. Peragine failed to notify the filing officer on the prescribed reporting date that no report was to be filed. Late filing of the required waiver notice(s) reflect a deliberate failure to provide information to the filing officer as required by Section 106.07(7), Florida Statutes.

Report(s):

2014 M5

2014 P1

2014 P1A

---

**Sent By:** Kristi Reid Bronson  
**Date:** August 29, 2014

KRB

ejr

000001

## **AFFIDAVIT**

**STATE OF FLORIDA**

**County of Leon**

**Kristi Reid Bronson, 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. Citizens for Ethical Leadership (60013) is an electioneering communications organization registered with the Division. On August 30, 2012, Mr. Michael J. Peragine filed the DSDE 41 and 103 with the Division of Elections indicating that Mr. Peragine was the chairperson and treasurer for the organization (See attached documents and acknowledgment letter )
5. The 2014 M5 campaign treasurer's report was due on June 10, 2014. At the time the 2014 M5 report was due, Mr Peragine was the treasurer.
6. On June 11, 2014, the Division mailed Mr. Peragine notifications that the 2014 M5 campaign treasurer's report had not been filed (See attached letter).
7. The 2014 P1 campaign treasurer's report was due on June 27, 2014. At the time the 2014 P1 report was due, Mr. Peragine was the treasurer. (See attached letter)
8. On June 30, 2014, the Division mailed Mr. Peragine notifications that the 2014 P1 campaign treasurer's report had not been filed (See attached letter)
9. On July 16, 2014, the Division mailed Mr Peragine notifications that the 2014 P1 campaign treasurer's report had not been filed. (See attached letter).

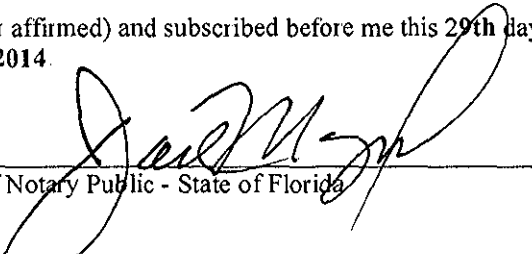
**000002**

10. The 2014 P1A campaign treasurer's report was due on July 4, 2014. At the time the 2014 P1A report was due, Mr. Peragine was the treasurer.
11. On July 7, 2014, the Division mailed Mr. Peragine notifications that the 2014 P1A campaign treasurer's report had not been filed. (See attached letter).
12. On July 21, 2014, the Division mailed Mr. Peragine notifications that the 2014 P1A campaign treasurer's report had not been filed. (See attached letter)
13. On July 8, 2014, the Division mailed Mr. Peragine final notification with delivery confirmation that the 2014 M5, 2014 P1, and 2014 P1A reports had not been filed (See attached letter with delivery confirmation)
14. As of August 29, 2014, Citizens for Ethical Leadership has failed to file the 2014 M5, 2014 P1, and 2014 P1A 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 29<sup>th</sup> day  
of August, 2014.

  
\_\_\_\_\_  
Signature of Notary Public - State of Florida

Print, Type, or Stamp Commissioned Name of Notary  
Public

Personally Known ☒



**Citizens for Ethical Leadership**

277 Sedona Way

Palm Beach Gardens, FL 33418

RECEIVED  
DEPARTMENT OF STATE

2012 AUG 30 AM 10:31

DIVISION OF ELECTIONS  
TALLAHASSEE, FL

July 31, 2012

Via FedEx

Department of State  
Division of Elections  
Director's Office  
Room 316, R. A. Gray Building  
500 South Bronough Street  
Tallahassee, FL 32399-0250

RE: Citizens for Ethical Leadership Filing

Dear Filing Officer:

Please find enclosed documents for the newly formed Electioneering Communication Organization Citizens for Ethical Leadership, including DS-DE 103 and DS-DE 41. If you require any further documentation or have questions, please contact the ECO's attorney at 561.702.6649.

Sincerely,



Michael J. Peragine  
Chairperson

Enclosure

000004

**ELECTIONEERING COMMUNICATION  
STATEMENT OF ORGANIZATION**

(PLEASE TYPE)

RECEIVED  
DEPARTMENT OF STATE

2012 AUG 30 AM 10: 34

DIVISION OF ELECTIONS  
TALLAHASSEE, FL

OFFICE USE ONLY

**1. Full Name of Organization**

Citizens for Ethical Leadership

Telephone

(561) 342-1258

Mailing Address (include city state and zip code)

277 Sedona Way, Palm Beach Gardens FL 33418

Street Address (include city, state and zip code)

277 Sedona Way, Palm Beach Gardens, FL 33418

**2. Affiliated or Connected Organizations**

Name of Affiliated or Connected Organization	Mailing Address	Relationship
None		

**3. Area, Scope and Jurisdiction of the Organization**

Statewide Legislative, Multicounty, Countywide, and Municipal Candidates

**4. Identify by Name, Address & Position, the Custodian of Books & Accounts for the Organization**

Full Name	Mailing Address	Street Address	Title or Position
Michael J Peragine	277 Sedona Way, Palm Beach Gardens FL 33418	277 Sedona Way, Palm Beach Gardens FL 33418	Chairperson/Treasurer

**5. This Organization was formed (check applicable box): (Calendar quarters end the last day of March, June, September, and December )**

- ☒ As a newly created organization during the current calendar quarter.  
☐ From an organization existing prior to the current calendar quarter.

000005

6. List By Name, Mailing and Street Address, & Position, Other Principal Officers, including the treasurer and deputy treasurer, if any. Include the top-ranking officer's (e.g., chairperson) name and information.

Full Name	Mailing Address	Street Address	Title or Position
Michael J. Peragine	277 Sedona Way, Palm Beach Gardens, FL 33418	277 Sedona Way, Palm Beach Gardens, FL 33418	Chairperson/Treasurer

7. In the Event of Dissolution, What Disposition will be Made of the Residual Funds?

Pro Rata to Contributors

8. List All Banks, Safety Deposit Boxes, or Other Depositories Used by this Organization for Electioneering Communications

Name of Bank or Depository	Mailing Address
SunTrust Banks Inc	501 South Flagler Drive West Palm Beach, FL 33401

9. List All Reports Required to be Filed by this Organization with Federal Officials, & the Names, Addresses, & Positions of Such Officials, If Any

Report Title	Dates Required to be Filed	Name & Position of Official	Mailing Address
Form 8871 Form 990	Upon Organization Annually April	IRS IRS	Ogden UT 84201

STATE OF Florida Palm Beach COUNTY

Michael J. Peragine certify that the information in this Statement of

Organization is complete, true, and correct

X M. Peragine  
Signature of Top-ranking Principal Officer of Organization

July 30, 2012

Date

000006

**REGISTERED AGENT  
STATEMENT OF APPOINTMENT**  
(Section 106.022 F.S.)

RECEIVED  
OFFICE OF THE CLERK OF STATE

2012 AUG 30 AM 10:34

DIVISION OF ELECTIONS  
TALLAHASSEE, FL

☒ Original Appointment ☐ Change of Appointment  
☐ Change of Mailing Address ☐ Change of Physical Address

**Registered Agent and Office Information**

Name **Michael J. Peragine** Telephone **(561)342-1258**

Street Address  
**277 Sedona Way**

City **Palm Beach Gardens** State **FL** Zip Code **33418**

Mailing Address  
**277 Sedona Way**

City **Palm Beach Gardens** State **FL** Zip Code **33418**

I accept this appointment and confirm that I am familiar with and accept the obligations of the position as set forth in Section 106.022, F.S. I also understand that I may resign this appointment by executing a written statement of resignation and filing it with the applicable filing officer.

  
Signature of Registered Agent

**July 30, 2012**  
Date

**Former Registered Agent and Office Information (for changes only)**

Name Telephone

Street Address

City State Zip Code

**Committee or Organization Information**

Name of Committee or Organization  
**Citizens for Ethical Leadership**

Street Address Telephone  
**277 Sedona Way (561)342-1258**

City State Zip Code  
**Palm Beach Gardens FL 33418**

  
Signature of Chairperson

**Michael J. Peragine**  
Printed Name of Chairperson

**July 30, 2012**  
Date



## FLORIDA DEPARTMENT *of* STATE

**RICK SCOTT**  
Governor

**KEN DETZNER**  
Secretary of State

September 4, 2012

Mr. Michael J. Peragine, Chairperson  
Citizens for Ethical Leadership  
277 Sedona Way  
Palm Beach Gardens, Florida 33418

Dear Mr. Peragine:

This will acknowledge receipt of the Application for Certification for **Citizens for Ethical Leadership**, which was placed on file in our office on August 30, 2012. This information appears to comply with the requirements of Section 106.011 and 106.03, Florida Statutes. The name of this organization has been placed on our active list as an electioneering communications organization.

### Campaign Treasurer's Reports

Your first campaign treasurer's report will be due on **September 21, 2012**. The report will cover the period of August 10, 2012 - September 14, 2012. All electioneering communications organizations that file reports with the Division of Elections are required to file by means of the Division's electronic filing system (EFS).

### Credentials and Sign-ons

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

**EFS Web site Address:** <https://efs.dos.state.fl.us>  
**Identification Number:** 60013



R. A. Gray Building • 500 South Bronough Street • Tallahassee, Florida 32399-0250  
Telephone: (850) 245-6240 • Facsimile: (850) 245-6259 [www.dos.state.fl.us](http://www.dos.state.fl.us)  
Commemorating 500 years of Florida history [www.fl500.com](http://www.fl500.com)

000008



Mr. Michael J. Peragine, Chairperson  
September 4, 2012  
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 electioneering communications organization chairperson is required to provide the Division of Elections with confidential personal information that may be used to allow access in the event that the password is forgotten or lost. When you enter the organization's account screen, there will be a drop down box where you pick a question (such as *What is your mother's maiden name?*) and supply an answer. All passwords and answers to questions are stored as encrypted data and cannot be viewed by Division staff and given out over the phone. Please notify the Division if your credentials have been compromised.

### Timely Filing

All reports must be completed and filed through the EFS not later than midnight, Eastern Standard Time (EST), of the due date. Reports not filed by midnight, EST, of the due date are late filed and subject to the penalties in Section 106.0703(7), 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, EST, of the first business day the EFS becomes operable. No fine will be levied during the period the EFS was inoperable.

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

### Electronic Receipts

The person submitting the report on the EFS will be issued an electronic receipt indicating and verifying the report was filed. Each treasurer's report filed by means of the EFS is considered to be under oath by the campaign treasurer and such persons are subject to the provisions of Section 106.0703(4), Florida Statutes.

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Mr Michael J. Peragine, Chairperson  
September 4, 2012  
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' web site at <http://elections.myflorida.com>. It is your responsibility to read, understand, and follow the requirements of Florida's election laws. Therefore, please print a copy of the following documents: Chapters 104 and 106, Florida Statutes, 2012 *Electioneering Communications Organization Handbook*, 2012 *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/ljr

Enclosures

**OCC010**



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

June 11, 2014

Michael J Peragine, Treasurer  
Citizens for Ethical Leadership  
277 Sedona Way  
Palm Beach Gardens, FL 33418-3418

Re: ECO 60013

Dear Mr. Peragine:

Your campaign treasurer's report, which was due June 10, 2014, has not been received

Sections 106.0703(7)(b), Florida Statutes, require that the filing officer immediately notify you of the failure to file this report and that a fine will be assessed of \$50 per day for the first 3 days late and, thereafter \$500 per day, although a fine cannot exceed 25% of the total receipts or expenditures, whichever is greater, for the period covered by the late report. However, for the report 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

Once your report is filed, this office will notify you of the specific amount of your fine. Fines must be paid to the filing officer within 20 days of receipt of the payment due notice.

Please be advised, however, that failure to file a campaign treasurer's report may constitute a violation of Chapter 106, Florida Statutes, independent of the automatic fine violation referenced above. Therefore, if you fail to file a report, the division will turn the matter over to the Florida Elections Commission.

Section 106.265(1), Florida Statutes, authorizes the Florida Elections Commission, to impose a civil penalty up to \$1,000 per count for each willful violation of Chapter 106.

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

Sincerely,

Kristi Reid Bronson, Chief  
Bureau of Election Records

000011



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

June 30, 2014

Michael J. Peragine, Treasurer  
Citizens for Ethical Leadership  
277 Sedona Way  
Palm Beach Gardens, FL 33418-3418

Re: ECO 60013

Dear Mr. Peragine:

Your campaign treasurer's report, which was due June 27, 2014, has not been received.

Sections 106.0703(7)(b), Florida Statutes, require that the filing officer immediately notify you of the failure to file this report and that a fine will be assessed of \$50 per day for the first 3 days late and, thereafter \$500 per day, although a fine cannot exceed 25% of the total receipts or expenditures, whichever is greater, for the period covered by the late report. However, for the report 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.

Once your report is filed, this office will notify you of the specific amount of your fine. Fines must be paid to the filing officer within 20 days of receipt of the payment due notice.

Please be advised, however, that failure to file a campaign treasurer's report may constitute a violation of Chapter 106, Florida Statutes, independent of the automatic fine violation referenced above. Therefore, if you fail to file a report, the division will turn the matter over to the Florida Elections Commission.

Section 106.265(1), Florida Statutes, authorizes the Florida Elections Commission, to impose a civil penalty up to \$1,000 per count for each willful violation of Chapter 106.

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

Sincerely,

Kristi Reid Bronson, Chief  
Bureau of Election Records

000012



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**

Secretary of State

DIVISION OF ELECTIONS

**Second Notice**

July 16, 2014

Michael J. Peragine, Treasurer  
Citizens for Ethical Leadership  
277 Sedona Way  
Palm Beach Gardens, FL 33418-3418

Re: ECO 60013

Dear Mr Peragine:

Your campaign treasurer's report, due June 27, 2014, has not been received.

Sections 106 0703(7)(b), Florida Statutes, require that the filing officer immediately notify you of the failure to file a report.

The first notice of the failure to file the above mentioned report was mailed, via regular mail, to the address on file with our office on June 30, 2014. As of this date, we do not show a record of receiving this report.

If the report is not filed via the Division's electronic filing system within 14 days of receipt of this notice, this matter will be referred to the Florida Elections Commission for further action. Section 106 265(1), Florida Statutes, authorizes the Florida Elections Commission, upon finding a willful violation of Chapter 106, Florida Statutes, to impose a civil penalty up to \$1,000 per

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

000013



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

July 7, 2014

Michael J. Peragine, Treasurer  
Citizens for Ethical Leadership  
277 Sedona Way  
Palm Beach Gardens, FL 33418-3418

Re: ECO 60013

Dear Mr. Peragine:

Your campaign treasurer's report, which was due July 4, 2014, has not been received.

Sections 106.0703(7)(b), Florida Statutes, require that the filing officer immediately notify you of the failure to file this report and that a fine will be assessed of \$50 per day for the first 3 days late and, thereafter \$500 per day, although a fine cannot exceed 25% of the total receipts or expenditures, whichever is greater, for the period covered by the late report. However, for the report 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.

Once your report is filed, this office will notify you of the specific amount of your fine. Fines must be paid to the filing officer within 20 days of receipt of the payment due notice.

Please be advised, however, that failure to file a campaign treasurer's report may constitute a violation of Chapter 106, Florida Statutes, independent of the automatic fine violation referenced above. Therefore, if you fail to file a report, the division will turn the matter over to the Florida Elections Commission.

Section 106.265(1), Florida Statutes, authorizes the Florida Elections Commission, to impose a civil penalty up to \$1,000 per count for each willful violation of Chapter 106.

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

Sincerely,

A handwritten signature in cursive script that reads "Kristi Reid B".

Kristi Reid Bronson, Chief  
Bureau of Election Records

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FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

**Second Notice**

July 21, 2014

Michael J. Peragine, Treasurer  
Citizens for Ethical Leadership  
277 Sedona Way  
Palm Beach Gardens, FL 33418-3418

Re: ECO 60013

Dear Mr. Peragine:

Your campaign treasurer's report, due July 4, 2014, has not been received.

Sections 106.0703(7)(b), Florida Statutes, require that the filing officer immediately notify you of the failure to file a report.

The first notice of the failure to file the above mentioned report was mailed, via regular mail, to the address on file with our office on July 7, 2014. As of this date, we do not show a record of receiving this report.

If the report is not filed via the Division's electronic filing system within 14 days of receipt of this notice, this matter will be referred to the Florida Elections Commission for further action. Section 106.265(1), Florida Statutes, authorizes the Florida Elections Commission, upon finding a willful violation of Chapter 106, Florida Statutes, to impose a civil penalty up to \$1,000 per

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

Sincerely,

Kristi Reid Bronson, Chief  
Bureau of Election Records

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## FLORIDA DEPARTMENT of STATE

**RICK SCOTT**  
Governor

**KEN DETZNER**  
Secretary of State

### **FINAL NOTICE**

**Delivery Confirmation:**

USPS TRACKING #  
& CUSTOMER  
RECEIPT

**9114 9010 7574 2751 2918 30**  
For Tracking or Inquiries go to USPS.com  
or call 1-800-222-1811

July 8, 2014

Michael J Peragine, Treasurer  
Citizens for Ethical Leadership (60013)  
277 Sedona Way  
Palm Beach Gardens, FL 33418

Dear Mr. Peragine:

According to a review of the Division's records, the organization referenced above has not filed the following reports:

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2014	M5	05/01/2014 - 05/31/2014
2014	P1	06/01/2014 - 06/20/2014
2014	P1A	06/21/2014 - 06/27/2014

The organization has previously been notified of the reports that are outstanding. Enclosed are copies of letters sent by the Division. If the reports are not filed **within 7 days of receipt of this letter**, the Division will forward this matter to the Florida Elections Commission for further action. Section 106.265(1), Florida Statutes, authorizes the Florida Elections Commission to impose civil penalties of up to \$1,000 per violation.

If you have any questions, please call the help desk at (850) 245-6240

Sincerely,

Kristi Reid Bronson, Chief  
Bureau of Election Records

KRB/dsb

Enclosure

**000016**

Division of Elections

R.A. Gray Building, Suite 316 • 500 South Bronough Street • Tallahassee, Florida 32399  
850.245.6200 • 850.245.6217 (Fax) [election.dos.state.fl.us](mailto:election.dos.state.fl.us)



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## USPS Tracking™

[Customer Service >](#)  
Have questions? We're here to help.

Tracking Number: 9114901075742751291830

### Product & Tracking Information

### Available Actions

**Postal Product:****Features:**  
USPS Tracking™

DATE & TIME	STATUS OF ITEM	LOCATION
July 11, 2014, 9:31 am	Delivered	PALM BEACH GARDENS FL 33418
Your item was delivered at 9:31 am on July 11, 2014 in PALM BEACH GARDENS FL 33418		
July 11, 2014, 6:55 am	Arrived at Post Office	PALM BEACH GARDENS FL 33410
July 11, 2014, 4:05 am	Departed USPS Facility	WEST PALM BEACH FL 33416
July 11, 2014, 2:44 am	Arrived at USPS Facility	WEST PALM BEACH FL 33416
July 10, 2014, 3:16 am	Departed USPS Facility	TALLAHASSEE FL 32301
July 9, 2014, 10:27 pm	Arrived at USPS Facility	TALLAHASSEE FL 32301

### Track Another Package

What's your tracking (or receipt) number?

[Track It](#)**LEGAL**[Privacy Policy >](#)  
[Terms of Use >](#)  
[FOIA >](#)  
[No FEAR Act EEO Data >](#)**ON USPS.COM**[Government Services >](#)  
[Buy Stamps & Shop >](#)  
[Print a Label with Postage >](#)  
[Customer Service >](#)  
[Delivering Solutions to the Last Mile >](#)  
[Site Index >](#)**ON ABOUT.USPS.COM**[About USPS Home >](#)  
[Newsroom >](#)  
[USPS Service Alerts >](#)  
[Forms & Publications >](#)  
[Careers >](#)**OTHER USPS SITES**[Business Customer Gateway >](#)  
[Postal Inspectors >](#)  
[Inspector General >](#)  
[Postal Explorer >](#)  
[National Postal Museum >](#)

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**HISTORY NOTES**  
Citizens for Ethical Leadership - 60013

Unique ID	Date Recorded	Last Edited Date	Originally Recorded By
36111	1/6/2014 9:00:00 AM		slbagley
RE: M10 Audit 1/2/14 @ 3:34 pm - Closed via Kristi's ok			
35963	12/23/2013 9:21:00 AM		slbagley
RE: M10 Audit - Phone Call Mr. Peragine called me He said he had received the dates he needed to correct the errors in his M10 report and that he would have it complete today Slb			
35813	12/16/2013 12:35:00 PM		slbagley
RE: M10 Audit Email Follow up ATTENTION: Mr Michael Peragine, Treasurer & Chairperson for Citizens for Ethical Leadership. This message is a follow up to the phone conversation we had earlier today (12/16/13 @ 12:13 pm) regarding your Q3 Audit On December 5, 2013, you were sent a Second Notice advising that your Q3 campaign treasurer's report is incomplete and that you had 7 days to provide the requested information Our records show that changes have not been made to the report and are still incomplete Please provide the requested information below by Monday, December 23, 2013 or a Final Notice Letter will be mailed Q3 Report Regarding Contribution Seq 1 and Expenditure Seq 1: Per our phone conversation, I understood that your PAC made a contribution to the R P O F, which was then refunded to you. Since it is a refund to an expenditure, the refund will need to show on the expenditure side. You will still show it as an expenditure and then again as the refund. The original expenditure will be a positive amount and the refund will be shown as a negative amount. Please also remember to include the dates for both of these instances  If you have any questions, you may call me directly at 850-245-6214 Stacy Bagley  ----- Mr. Peragine  I'm sorry for the 2nd email. I made a typo in the previous email. Your audit is on your M10 Report not the Q3  Sorry again for any confusion  Stacy Bagley			
35810	12/16/2013 12:14:00 PM		slbagley
RE: M10 Audit Phone Call Returned Mr. Peragine returned my call. I asked if the refund was a contribution he made and that was returned to him. He said yes. I told him that he should put the refund on the expenditure side and to mark it as a refund and a negative amount. I also reminded him to add the dates. He said he would get it fixed today.			
35809	12/16/2013 12:08:00 PM		slbagley
RE: M10 Audit Phone Call Called Mr. Peragine and left message regarding M10 audit and that I'd like to help him get it corrected			

# HISTORY NOTES

## Citizens for Ethical Leadership - 60013

Unique ID	Date Recorded	Last Edited Date	Originally Recorded By
35667	12/9/2013 3:21:00 PM		slbagley
Re: M10 Audit			
Second Notice Letter Mailed 12/5/13			
35146	11/19/2013 1:04:00 PM		slbagley
M10 Audit - Completion Audit Letter 1 mailed out on 11/18/13 (slb)			
33233	6/6/2013 3:58:00 PM		mcchellman
Chair/T called re: Audit for 2012 G4 and Q4 While on phone he amended the Q4, correcting the date, and filed it. The G4 was left in pending as he needed to find out the contributor's occupation He said he would file the pending report as soon as he got that information			
33213	6/5/2013 5:01:00 PM		lbelvin
RE: Workin og G4 report			
4:59pm 6-5-2013			
Michael Peragine called regarding an email that our office sent him about Citizens for Ethical Leadership #60013 needs to file the G4 report or they would be referred to the commission He said he wanted Ms Kristi to know that he will work on this tonight and get the report completed and filed			
32471	2/8/2013 10:44:00 AM		MCChellman
Tre/Chair called re 2012 Q4 Audit. I helped him use the unused OD to create an OD that linked to the Exp Seq 2, and to correct the date on Exp 3 He stated that he would file the report.			
30535	9/21/2012 5:38:00 PM		mcchellman
Speke to chair/treasurer Helped him with his G1 but was not on the phone with him when he will file it - he wanted to review it again. Noted the excessive cashier's check contribution, Seq #1 Advised him to refused that excessive cash contribution, or all but \$50, and that that would be reported on his G2 when that occurred I advised him to submit a letter ahead of the audit detailed the excessive cash and how he would rectify it and where he would be reporting it			

## Filed Reports for Elec ID: 20141104-GEN

Account: 60013 - ECO Citizens for Ethical Leadership  
Chairperson: Peragine, Michael J. Appt: 8/30/12

Report: **2013 Q1 (6)** From: 1/1/2013 Amd: N Filed: **FIL** 4/10/2013 11:41:23 P  
Due: **4/10/2013** To: 3/31/2013 Cmpl: **NOD** Reviewed: **AUD** 4/10/2013 11:29:37 P

<i>Submitted</i>	<i>Treasurer</i>	<i>Appointed</i>	<i>Withdrew</i>	<i>Entry Method</i>	<i>File Method</i>	<i>Chair PIN</i>
4/10/2013	Michael J Peragine	8/30/2012		Web Data Entry	Web Filed	

Report: **2013 Q2 (7)** From: 4/1/2013 Amd: N Filed: **FIL** 7/10/2013 1:13:50 P  
Due: **7/10/2013** To: 6/30/2013 Cmpl: **NOD** Reviewed: **AUD** 7/10/2013 1:13:27 P

<i>Submitted</i>	<i>Treasurer</i>	<i>Appointed</i>	<i>Withdrew</i>	<i>Entry Method</i>	<i>File Method</i>	<i>Chair PIN</i>
7/10/2013	Michael J. Peragine	8/30/2012		Web Data Entry	Web Filed	

Report: **2013 Q3 (8)** From: 7/1/2013 Amd: N Filed: **FIL** 10/10/2013 7:54:39 P  
Due: **10/10/2013** To: 9/30/2013 Cmpl: **NOD** Reviewed: **AUD** 10/10/2013 7:52:38 P

<i>Submitted</i>	<i>Treasurer</i>	<i>Appointed</i>	<i>Withdrew</i>	<i>Entry Method</i>	<i>File Method</i>	<i>Chair PIN</i>
10/10/2013	Michael J. Peragine	8/30/2012		Web Data Entry	Web Filed	

Report: **2013 M10 (9)** From: 10/1/2013 Amd: Y Filed: **FIL** 11/12/2013 11:40:57  
Due: **11/12/2013** To: 10/31/201 Cmpl: **COM** Reviewed: **AUD** 12/23/2013 11:53:52

<i>Submitted</i>	<i>Treasurer</i>	<i>Appointed</i>	<i>Withdrew</i>	<i>Entry Method</i>	<i>File Method</i>	<i>Chair PIN</i>
11/12/2013	Michael J. Peragine	8/30/2012		Web Data Entry	Web Filed	
12/23/2013	Michael J. Peragine	8/30/2012		Web Data Entry	Web Filed	

Report: **2013 M11 (10)** From: 11/1/2013 Amd: N Filed: **FIL** 12/10/2013 11:27:59  
Due: **12/10/2013** To: 11/30/201 Cmpl: **NOD** Reviewed: **AUD** 12/10/2013 11:27:44

<i>Submitted</i>	<i>Treasurer</i>	<i>Appointed</i>	<i>Withdrew</i>	<i>Entry Method</i>	<i>File Method</i>	<i>Chair PIN</i>
12/10/2013	Michael J Peragine	8/30/2012		Web Data Entry	Web Filed	

Report: **2013 M12 (11)** From: 12/1/2013 Amd: Y Filed: **FIL** 1/10/2014 11:43:19 P  
Due: **1/10/2014** To: 12/31/201 Cmpl: **COM** Reviewed: **AUD** 1/10/2014 11:46:07 P

<i>Submitted</i>	<i>Treasurer</i>	<i>Appointed</i>	<i>Withdrew</i>	<i>Entry Method</i>	<i>File Method</i>	<i>Chair PIN</i>
1/10/2014	Michael J. Peragine	8/30/2012		Web Data Entry	Web Filed	
1/10/2014	Michael J. Peragine	8/30/2012		Web Data Entry	Web Filed	

Report: **2014 M1 (12)** From: 1/1/2014 Amd: N Filed: **FIL** 2/11/2014 2:10:56 P  
Due: **2/10/2014** To: 1/31/2014 Cmpl: **NOD** Reviewed: **AUD** 2/11/2014 2:10:56 P

<i>Submitted</i>	<i>Treasurer</i>	<i>Appointed</i>	<i>Withdrew</i>	<i>Entry Method</i>	<i>File Method</i>	<i>Chair PIN</i>
2/11/2014	Michael J. Peragine	8/30/2012		Web Data Entry	Web Filed	

## Filed Reports for Elec ID: 20141104-GEN

Account: 60013 - ECO Citizens for Ethical Leadership  
 Chairperson: Peragine, Michael J. Appt: 8/30/12

Report: <b>2014 M2 (13)</b>	From: 2/1/2014	Amd: N	Filed: <b>FIL</b>	3/13/2014 12:26:17 A
Due: <b>3/10/2014</b>	To: 2/28/2014	Cmpl: NOD	Reviewed: <b>AUD</b>	3/13/2014 12:25:48 A
<b>Submitted</b>	<b>Treasurer</b>	<b>Appointed</b>	<b>Withdrew</b>	<b>Entry Method</b>
3/13/2014	Michael J. Peragine	8/30/2012		Web Data Entry
				Web Filed

Report: <b>2014 M3 (14)</b>	From: 3/1/2014	Amd: N	Filed: <b>FIL</b>	4/11/2014 12:07:02 A
Due: <b>4/10/2014</b>	To: 3/31/2014	Cmpl: NOD	Reviewed: <b>AUD</b>	4/11/2014 12:06:49 A
<b>Submitted</b>	<b>Treasurer</b>	<b>Appointed</b>	<b>Withdrew</b>	<b>Entry Method</b>
4/11/2014	Michael J Peragine	8/30/2012		Web Data Entry
				Web Filed

Report: <b>2014 M4 (15)</b>	From: 4/1/2014	Amd: N	Filed: <b>FIL</b>	5/13/2014 11:56:28 P
Due: <b>5/12/2014</b>	To: 4/30/2014	Cmpl: NOD	Reviewed: <b>AUD</b>	5/13/2014 11:55:54 P
<b>Submitted</b>	<b>Treasurer</b>	<b>Appointed</b>	<b>Withdrew</b>	<b>Entry Method</b>
5/13/2014	Michael J. Peragine	8/30/2012		Web Data Entry
				Web Filed

Report: <b>2014 P2 (16)</b>	From: 6/28/2014	Amd: N	Filed: <b>FIL</b>	7/11/2014 11:31:01 P
Due: <b>7/11/2014</b>	To: 7/4/2014	Cmpl: NOD	Reviewed: <b>AUD</b>	7/11/2014 11:30:46 P
<b>Submitted</b>	<b>Treasurer</b>	<b>Appointed</b>	<b>Withdrew</b>	<b>Entry Method</b>
7/11/2014	Michael J Peragine	8/30/2012		Web Data Entry
				Web Filed

Report: <b>2014 P2A (17)</b>	From: 7/5/2014	Amd: N	Filed: <b>FIL</b>	7/18/2014 11:52:51 P
Due: <b>7/18/2014</b>	To: 7/11/2014	Cmpl: NOD	Reviewed: <b>AUD</b>	7/18/2014 11:52:32 P
<b>Submitted</b>	<b>Treasurer</b>	<b>Appointed</b>	<b>Withdrew</b>	<b>Entry Method</b>
7/18/2014	Michael J Peragine	8/30/2012		Web Data Entry
				Web Filed

Report: <b>2014 P3 (18)</b>	From: 7/12/2014	Amd: N	Filed: <b>FIL</b>	7/25/2014 8:48:47 A
Due: <b>7/25/2014</b>	To: 7/18/2014	Cmpl: NOD	Reviewed: <b>AUD</b>	7/25/2014 8:48:32 A
<b>Submitted</b>	<b>Treasurer</b>	<b>Appointed</b>	<b>Withdrew</b>	<b>Entry Method</b>
7/25/2014	Michael J Peragine	8/30/2012		Web Data Entry
				Web Filed

Report: <b>2014 P4 (19)</b>	From: 7/19/2014	Amd: N	Filed: <b>FIL</b>	7/30/2014 5:35:28 A
Due: <b>8/1/2014</b>	To: 7/25/2014	Cmpl: NOD	Reviewed: <b>AUD</b>	7/30/2014 5:35:07 A
<b>Submitted</b>	<b>Treasurer</b>	<b>Appointed</b>	<b>Withdrew</b>	<b>Entry Method</b>
7/30/2014	Michael J Peragine	8/30/2012		Web Data Entry
				Web Filed

Report: <b>2014 P5 (20)</b>	From: 7/26/2014	Amd: N	Filed: <b>FIL</b>	8/8/2014 7:40:45 PM
Due: <b>8/8/2014</b>	To: 8/1/2014	Cmpl: NOD	Reviewed: <b>AUD</b>	8/8/2014 7:39:51 PM
<b>Submitted</b>	<b>Treasurer</b>	<b>Appointed</b>	<b>Withdrew</b>	<b>Entry Method</b>
8/8/2014	Michael J Peragine	8/30/2012		Web Data Entry
				Web Filed

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## Filed Reports for Elec ID: 20141104-GEN

Account: 60013 - ECO Citizens for Ethical Leadership  
Chairperson: Peragine, Michael J. Appt: 8/30/12

Report: 2014 P6 (21)	From: 8/2/2014	Amd: N	Filed: FIL	8/12/2014 10:31:16 A		
Due: 8/15/2014	To: 8/8/2014	Cmplt: NOD	Reviewed: AUD	8/12/2014 10:30:55 A		
<i>Submitted</i>	<i>Treasurer</i>	<i>Appointed</i>	<i>Withdrew</i>	<i>Entry Method</i>	<i>File Method</i>	<i>Chair PIN</i>
8/12/2014	Michael J. Peragine	8/30/2012		Web Data Entry	Web Filed	

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