

STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION

In Re: **Eric Robinson**

Case No.: **FEC 20-295**

TO: Ben Gibson, Esquire
Shutts & Bowen, LLP
215 South Monroe Street, Suite 804
Tallahassee, FL 32301

Ronald G. Meyer, Esquire
Meyer and Blohm, P.A.
PO Box 1547
Tallahassee, FL 32302

AMENDED NOTICE OF VIRTUAL HEARING (REVIEW OF PETITION FOR ATTORNEY'S FEES AND COSTS)
(ONLY CHANGES MADE WERE TO CORRECT WEBINAR ID & TELECONFERENCE DIAL-IN NUMBER & ACCESS CODE)

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

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

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

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

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

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

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

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

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

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

See further instructions on the reverse side.

Tim Vaccaro
Executive Director
Florida Elections Commission
August 23, 2021

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

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

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

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

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

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

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



Florida Elections Commission

107 West Gaines Street, Suite 224 Tallahassee, Florida 32399-6596

Telephone: (850) 922-4539 · Facsimile: (850) 921-0783

FEC@myfloridalegal.com · www.fec.state.fl.us



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

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

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

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

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

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

Thank you,

Commission Staff

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Eric Robinson

Case No.: FEC 20-295

TO: Ben Gibson, Esquire
Shutts & Bowen, LLP
215 South Monroe Street, Suite 804
Tallahassee, FL 32301

Ronald G. Meyer, Esquire
Meyer and Blohm, P.A.
PO Box 1547
Tallahassee, FL 32302

NOTICE OF VIRTUAL HEARING (REVIEW OF PETITION FOR ATTORNEY'S FEES AND COSTS)

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

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Tim Vaccaro
Executive Director
Florida Elections Commission
August 13, 2021

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Florida Elections Commission

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

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 3. Enter the 9-digit Webinar ID: 411242395 and your email address.
 4. Register your name and email address.
 5. You will automatically join the meeting as an attendee. Attendees are muted and can choose to utilize their webcam.

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

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

Thank you,

Commission Staff

From: [Timothy Vaccaro](#)
To: [Benjamin J. Gibson](#)
Cc: [Michelle M. Montanaro](#); [Donna Malphurs](#)
Subject: Re: May FEC Meeting
Date: Sunday, May 9, 2021 12:47:29 PM

Absolutely, Ben. Just let me know.

Thanks,

Tim

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From: Benjamin J. Gibson <BGibson@shutts.com>
Sent: Saturday, May 8, 2021 6:48:11 PM
To: Timothy Vaccaro <Timothy.Vaccaro@myfloridalegal.com>
Cc: Michelle M. Montanaro <MMontanaro@shutts.com>
Subject: RE: May FEC Meeting

Tim,

My mediation got rescheduled back to Tuesday, May 25, and so I now have a conflict with the FEC meeting that same day.

With Mr. Meyer's consent, can the fee petition in FEC 20-295 be placed on the agenda for the August 17 meeting?

-Ben



Benjamin J. Gibson
Partner

Shutts & Bowen LLP

215 South Monroe Street, Suite 804 | Tallahassee, FL 32301

Direct: (850) 241-1723 | Fax: (850) 241-1718

[E-Mail](#) | [Website](#)

From: Timothy Vaccaro <Timothy.Vaccaro@myfloridalegal.com>
Sent: Wednesday, May 5, 2021 11:12 PM
To: Benjamin J. Gibson <BGibson@shutts.com>
Cc: Michelle M. Montanaro <MMontanaro@shutts.com>
Subject: Re: May FEC Meeting

Great. Thanks, Ben.

Tim

Get [Outlook for Android](#)

From: Benjamin J. Gibson <BGibson@shutts.com>
Sent: Wednesday, May 5, 2021 10:43:53 PM
To: Timothy Vaccaro <Timothy.Vaccaro@myfloridalegal.com>
Cc: Michelle M. Montanaro <MMontanaro@shutts.com>
Subject: RE: May FEC Meeting

Hi Tim,

I will be available for the hearing on the fee petition in FEC 20-295 on Tuesday, May 25.

Thanks,
Ben



Benjamin J. Gibson
Partner

Shutts & Bowen LLP

215 South Monroe Street, Suite 804 | Tallahassee, FL 32301

Direct: (850) 241-1723 | Fax: (850) 241-1718

[E-Mail](#) | [Website](#)

From: Timothy Vaccaro <Timothy.Vaccaro@myfloridalegal.com>
Sent: Wednesday, May 5, 2021 12:47 PM
To: Benjamin J. Gibson <BGibson@shutts.com>
Cc: Michelle M. Montanaro <MMontanaro@shutts.com>
Subject: RE: May FEC Meeting

Thank you, Ben!

Tim Vaccaro
Executive Director
Florida Elections Commission
107 West Gaines Street
The Collins Building, Suite 224
Tallahassee, FL 32399-1050

(850) 922-4539

From: Benjamin J. Gibson <BGibson@shutts.com>
Sent: Wednesday, May 5, 2021 12:05 PM
To: Timothy Vaccaro <Timothy.Vaccaro@myfloridalegal.com>
Cc: Michelle M. Montanaro <MMontanaro@shutts.com>
Subject: Re: May FEC Meeting

Ok, thank you. I should know by the end of this week and will let you know.

Best,
Ben

Ben Gibson

On May 5, 2021, at 11:35 AM, Timothy Vaccaro <Timothy.Vaccaro@myfloridalegal.com> wrote:

Hi Ben,

We planned to have the fees petition on the agenda. Is the mediation an all-day event? If you get into a scheduling bind and need us to push out the fees petition, I'm sure we can do that, assuming Ron Meyer has no objection. The August meeting is tentatively scheduled for August 17.

It looks like we also have the Consent Order scheduled. That should go en masse, so I don't expect an issue. In the rare event they pulled it for discussion, I could ask them to continue it.

Just let me know.

Thanks,

Tim Vaccaro
Executive Director
Florida Elections Commission
107 West Gaines Street
The Collins Building, Suite 224
Tallahassee, FL 32399-1050
(850) 922-4539

From: Benjamin J. Gibson <BGibson@shutts.com>
Sent: Wednesday, May 5, 2021 11:21 AM
To: Timothy Vaccaro <Timothy.Vaccaro@myfloridalegal.com>
Cc: Michelle M. Montanaro <MMontanaro@shutts.com>

Subject: RE: May FEC Meeting

Hi Tim,

Thank you for the heads up.

I have two items that are pending and which I was communicating with Eric Lipman on previously:

1. Consent Order for FEC 20-284, *In re: Citrus County Republican Executive Committee*.
The Consent Order has been executed by my client and a payment in the amount of \$800 (check drawn on Shutts & Bowen trust account) was also previously dropped off with the Division.
2. Petition for Attorney's Fees and Costs in FEC 20-295, *Respondent: Eric Robinson*.

Will one or both of these items be on the agenda for the Tuesday, May 25 meeting?

I believe I may have a mediation scheduled for that date and so want to make sure I can coordinate.

Thank you—
Ben



Benjamin J. Gibson

Partner

Shutts & Bowen LLP

215 South Monroe Street, Suite 804 | Tallahassee, FL 32301

Direct: (850) 241-1723 | Fax: (850) 241-1718

[E-Mail](#) | [Website](#)

From: Timothy Vaccaro <Timothy.Vaccaro@myfloridalegal.com>

Sent: Monday, May 3, 2021 10:32 AM

To: Benjamin J. Gibson <BGibson@shutts.com>

Subject: May FEC Meeting

EXTERNAL: This email originated from outside of the SHUTTS email system. Do not respond, click any links or open any attachments unless you trust the sender and know the content is safe.

Good morning, Ben:

I hope you're well.

I'm not sure if you have any cases on the May agenda, but FYI we had to move the meeting to Tuesday, May 25. It will be a remote videoconference.

Thanks,

Tim

Tim Vaccaro
Executive Director
Florida Elections Commission
107 West Gaines Street
The Collins Building, Suite 224
Tallahassee, FL 32399-1050
(850) 922-4539

MEYER AND BLOHM, P.A.
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EMAIL: jblohm@meyerblohmlaw.com

LYNN T. THOMAS, FRP
PARALEGAL

May 4, 2021

VIA E-Mail: Tim.Vaccaro@myfloridalegal.com

Chair and Members
Florida Elections Commission
107 West Gaines Street
Collins Building, Suite 224
Tallahassee, Florida 32399

Re: Case No.: FEC 20-295 – George Thurlow – Response to Request for Award of Attorney Fees

Dear Commissioners:

The above-referenced request for attorney's fees made by Eric Robinson ("Robinson") does not state a *prima facie* case for such an award. Accordingly, the request should be denied.

Overview

First, Rule 2B-1.0045, *Florida Administrative Code*, requires that a petition seeking an award of attorney fees "shall state with particularity the facts and grounds that demonstrate that the respondent is entitled to an award of costs and attorney's fees from the complainant." (underlining added for emphasis). The Request before the Commission wholly fails to meet such pleading requirement.

Second, the Commission should make an award of attorney's fees only in the most egregious of circumstances since, otherwise, penalizing a person for bringing forward suspected violations of the Florida Election Code, will have a chilling effect upon the willingness of citizens to seek review by the Commission of suspected violations.

The Complainant Did Not Take Any Improper Actions

Federal law (see, 52 U.S.C. § 30121, formerly 2 U.S.C. § 441e) prohibits "foreign nationals" (defined to include foreign governments and corporations) from making contributions

in connection with a Federal, State, or local election. Subsection 30121(2) makes it unlawful for “a person to solicit, accept, or receive a contribution or donation...from a foreign national.”

In the matter before the Commission, the Complainant learned that Robinson had accepted and reported, on behalf of a political committee for which he was then the Treasurer¹ (Florida Country Political Committee), a contribution from a foreign national in a campaign report he filed with the Florida Division of Elections. The contribution facially appeared to be from an Ontario, Canada corporation, Queensgate Homes, Inc., with a Canadian address.

After a federal election complaint was filed, Robinson subsequently amended the Florida Country contribution report to reflect that the contribution came from an entity, Queensgate Homes, Inc. – Venosta Properties, that had a Florida address. While there is a Florida entity, Venosta Properties, which is related to the Canadian corporation, it is unclear from the report that still references Queensgate Homes, Inc. which entity made the contribution.² Based upon that knowledge, the Complainant filed a complaint with this Commission.

In response to the complaint, Robinson submitted materials to the Commission, which were not publicly ascertainable, to support his assertion that the contribution did not come from a foreign national company, but instead came from and should have been listed as a contribution from a domestic corporation. Therefore, the Executive Director of the Commission found the complaint to be legally insufficient and dismissed it. The Complainant did not submit supplemental information or take other steps in an effort to keep the complaint alive.

Accordingly, what this matter winnows down to is the fact that the Complainant filed a complaint, upon learning from campaign reports that an apparently illegal foreign contribution was received by Robinson on behalf of Florida Country. Robinson’s amendment of the report and supplying of other information supportive of the contribution not being from a foreign national caused the Executive Director to find the complaint to be legally insufficient. At that point the Complainant permitted the proceedings before this Commission to die.

While Robinson’s petition for fees references actions allegedly taken by the Complainant in conjunction with a separate federal election proceeding and references publicity which derived from such federal matter, it does not state “with particularity the facts and grounds that demonstrate that the respondent is entitled to an award of costs and attorney’s fees from the complainant” (emphasis added) in the proceedings before this Commission.

¹ Robinson resigned as Treasurer by letter dated December 22, 2020

² The impression that the Canadian company made the contribution is buttressed by the fact that it was refunded by the Florida Country political committee on November 17, 2020, to Queensgate Homes, Inc. in Ontario, Canada.

This case is governed by *Linda Yates v. Kathy Shure*, FEC Case No.: FEC 16-362, in which a complaint was dismissed for legal insufficiency. There a petition seeking an award of attorney fees made by the Respondent was denied by this Commission determining that as long as no false allegations material to a violation are present, there is not a basis for an award of fees (relying upon *Hadeed v. State of Florida, Commission on Ethics*, 208 So. 3d 782 at 785 holding that “so long as the allegations are true and material, costs and fees are not recoverable”).

In fact, the complaint filed in these proceedings only contained allegations which were true and material. There is no dispute that Robinson, as Treasurer of Florida Country Political Committee accepted and reported a contribution which facially appeared to be a contribution from a foreign national corporation in violation of federal law. When the report was changed after a federal election complaint was filed to “correct” the report, based upon facts not publicly ascertainable, it reasonably appeared that the law had been violated and that the change of the report was made for the purpose of disguising the illegal foreign contribution.

There were no untrue or immaterial facts alleged in the complaint; its allegations were true and correct and based wholly upon the reports and publicly available information supportive of a violation of law.

Therefore, the petition fails to establish a *prima facie* entitlement for an award of attorney fees.

The fee petition is full of supposition and innuendo but is deficient for its failure to state ultimate facts supportive of a malicious intent to file the complaint or reckless disregard for whether the complaint contained false immaterial allegations.³

In his effort to bolster his claim, Robinson first points to the fact that the Complainant included Robinson’s status as a candidate on the complaint form when, it is alleged, the complaint had nothing to do with his candidacy.

The Complainant did include such information based upon the question asked on the complaint form promulgated by the Commission, to-wit: “If individual is a candidate, list the office or position sought: _____” Such inclusion of office was solely the result of the Commission form asking for such information and the admonition, also on the Commission form: “**DO NOT** leave any blanks.”

³ We submit that since the only facts alleged in the complaint were true and material, irrespective of motivation, Robinson is not entitled to an award of attorney fees. However, the Complainant’s motivation in filing the complaint was not malicious or in disregard of the facts – the facts alleged were true.

Chair and Members
Florida Elections Commission
May 4, 2021
Page Four

Next, Robinson's petition makes the conclusory statement that the complaint was filed "to damage Respondent's personal and professional reputation and candidacy in his school board race." What is missing from such allegation is any ultimate fact that supports the conclusion. While the petition refers to a press statement made in connection with a Federal Election Commission proceeding which was similar, there are no particular facts stated which disclose that the Complainant undertook any action to publicize the complaint before this Commission or was in any other way motivated to damage the Respondent's reputation or candidacy.

So, too, Robinson seeks to establish through the decision of the state attorney not to file a criminal complaint that the Complainant was maliciously motivated or disregarded relevant facts. However, the fact that the complaint was filed with the state attorney based upon the circumstances which were extant is not evidence of malice or disregard for the facts. From the public information available, the change of address to remove the foreign national corporation's address gave rise to a reasonable belief that a legal violation occurred.

The Complainant accepted the Executive Director's finding of legal insufficiency. He did not attempt to assert additional facts to controvert the nonpublic information which Robinson submitted as his explanation. Viewed through the lens of this case, as this Commission must do, all that occurred is (1) an election complaint was filed based upon a facially unlawful report being changed in response to a federal election complaint being filed; (2) a determination was made of legal insufficiency based upon nonpublic facts being submitted by Robinson to support the change; and (3) the complaint was dismissed without more.

Robinson's petition should be found legally insufficient, denied and dismissed.

Sincerely yours,



Jennifer S. Blohm

JSB/ltt

From: [Ronald Meyer](#)
To: [Timothy Vaccaro](#)
Cc: [Donna Malphurs](#); [Benjamin J. Gibson](#)
Subject: Notice of Appearance - Case No.: 20-295 (George Thurlow)
Date: Wednesday, March 31, 2021 10:51:43 AM
Attachments: [Vaccaro - George Thurlow - Notice of Appearance.docx.pdf](#)

Dear Mr. Vaccaro,

Please see our attached notice of appearance in the above-referenced matter.

With kind regards, I am

Sincerely yours,

Ron
Ronald G. Meyer, Esquire
Meyer and Blohm, P.A.
Post Office Box 1547 (32302)
131 North Gadsden Street
Tallahassee, FL 32301
www.meyerbrookslaw.com

(850) 878-5212

(850) 656-6750 - Facsimile

Confidentiality Note:

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MEYER AND BLOHM, P.A.
ATTORNEYS AT LAW

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RONALD G. MEYER
JENNIFER S. BLOHM
STEPHANE A. SCHAAP

LYNN T. THOMAS, FRP
PARALEGAL

MAILING ADDRESS:

POST OFFICE BOX 1547
TALLAHASSEE, FLORIDA 32302

EMAIL: rmeyer@meyerbrookslaw.com

March 30, 2021

VIA E-Mail: Tim.Vaccaro@myfloridalegal.com

Mr. Tim Vaccaro, Executive Director
Florida Elections Commission
107 West Gaines Street
Collins Building, Suite 224
Tallahassee, Florida 32399

Re: Notice of Appearance – Case No. FEC 20-295 – George Thurlow

Dear Mr. Vaccaro:

This correspondence is to notify you that our office has been engaged to represent George Thurlow against whom a petition for an award of attorney's fees and costs has been made in the above-referenced matter.

Please furnish the undersigned with future information relating to the Commission's treatment of this matter. It is my understanding that the case has not yet been placed on a meeting agenda. We do not believe that a prima facie case for a fee award has been presented and will provide the Commission with our more fully stated position in a separate submission.

Thank you, in advance, for your cooperation.

Sincerely,



Ronald G. Meyer

RGM/ltt

cc: Mr. George Thurlow
Benjamin J. Gibson, Esquire via email
Ms. Donna Malphurs, Clerk FEC via email



Florida Elections Commission

107 West Gaines Street, Suite 224 Tallahassee, Florida 32399-1050

Telephone: (850) 922-4539 · Facsimile: (850) 921-0783

FEC@myfloridalegal.com · www.fec.state.fl.us



CERTIFIED MAIL # 9214 8969 0099 9790 1637 7994 56

March 11, 2020

George Thurlow
1302 52nd Street South
Gulfport, FL 33707

RE: Case No.: FEC 20-295; Respondent: Eric Robinson

Dear Mr. Thurlow:

The Florida Elections Commission received a Petition for Attorney's fees in this case. Pursuant to Rule 2B-1.0045, Florida Administrative Code, a copy of the Petition is enclosed for your review.

At its next regularly scheduled meeting, **currently set for May 18, 2021 (exact date and time to be determined), in Tallahassee, Florida**, the Commission will review the Petition and determine whether it states "a prima facie case for costs and attorney's fees." A notice of hearing will be provided approximately three weeks prior to the meeting date.

If you have any questions concerning the Petition, please contact the Florida Elections Commission at fec@myfloridalegal.com.

Sincerely,

Donna Ann Malphurs

Agency Clerk/Public Information Officer

/dam

Enclosure: Petition for Fees

cc: Benjamin Gibson, Attorney for Respondent w/out encl.



Re: Filing: Respondent's Petition for Attorney's Fees & Costs (FEC 20-295) 

Florida Elections Commission to: Benjamin J. Gibson

03/26/2021 10:54 AM

Sent by: **Donna Malphurs**

Cc: "Florida Elections Commission", "Michelle M. Abramitis"

Dear Mr. Gibson,

The Florida Elections Commission has received your petition for attorney's fees and costs in FEC 20-295. It is anticipated that your petition will be heard at the Commission's next available meeting, which is currently scheduled for May 18, 2021. A notice of hearing will be mailed approximately three weeks prior to the meeting date, with specific meeting date, time and location.

If you have any questions, please let us know.

Sincerely,

Donna Ann Malphurs
Agency Clerk/Public Information Officer

"Benjamin J. Gibson"

Good morning, Please find attached Respon...

03/26/2021 10:37:59 AM

From: "Benjamin J. Gibson" <BGibson@shutts.com>
To: "Florida Elections Commission" <fec@myfloridalegal.com>
Cc: "Michelle M. Abramitis" <MAbramitis@shutts.com>
Date: 03/26/2021 10:37 AM
Subject: Filing: Respondent's Petition for Attorney's Fees & Costs (FEC 20-295)

Good morning,

Please find attached Respondent's Petition for Attorney Fees and Costs in case no.: FEC 20-295, filed pursuant to section 106.265(6), Florida Statutes and Rule 2B-1.0045, Florida Administrative Code.

Feel free to contact me if you have any questions.

Best,

Benjamin J. Gibson

Partner

Shutts & Bowen LLP

215 South Monroe Street, Suite 804 | Tallahassee, FL 32301

Direct: (850) 241-1723 | Fax: (850) 241-1718

[E-Mail](#) | [Website](#)

[attachment "Respondent Petition for Fees (FEC 20-295).pdf" deleted by Donna Malphurs/OAG]



Filing: Respondent's Petition for Attorney's Fees & Costs (FEC 20-295) Benjamin J. Gibson to: 'Florida Elections Commission' 03/26/2021 10:37 AM
Cc: "Michelle M. Abramitis"
From: "Benjamin J. Gibson" <BGibson@shutts.com>
To: "'Florida Elections Commission'" <fec@myfloridalegal.com>
Cc: "Michelle M. Abramitis" <MAbramitis@shutts.com>

1 Attachment



Respondent Petition for Fees (FEC 20-295).pdf

Good morning,

Please find attached Respondent's Petition for Attorney Fees and Costs in case no.: FEC 20-295, filed pursuant to section 106.265 (6), Florida Statutes and Rule 2B-1.0045, Florida Administrative Code.

Feel free to contact me if you have any questions.

Best,

Shutts_Logo.j
nn

Benjamin J. Gibson

Partner

Shutts & Bowen LLP

215 South Monroe Street, Suite 804 | Tallahassee, FL 32301

Direct: (850) 241-1723 | Fax: (850) 241-1718

[E-Mail](#) | [Website](#)

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Eric Robinson

Case No.: FEC 20-295

RESPONDENT’S PETITION FOR AWARD OF ATTORNEY’S FEES AND COSTS

COMES NOW, Respondent, Eric Robinson, by and through his undersigned counsel and pursuant to section 106.265(6), Florida Statutes, and Rule 2B-1.0045, Florida Administrative Code, and files this petition for award of costs and attorney’s fees to be paid by the Complainant, George Thurlow, in case no. FEC 20-295. In support thereof, Respondent states:

Background

A. The Complaint

1. This proceeding involves a sworn complaint filed by self-described political activist George Thurlow (“Complainant”) alleging that Eric Robinson (“Respondent”), as treasurer for the Florida political committee Florida Country, committed a criminal violation under section 106.07(5), Florida Statutes, by willfully certifying the correctness of a treasurer’s report “while knowing that such report is incorrect, false, or incomplete....” See Compl. at Exh. A. The only factual basis asserted for this claim was that Respondent had filed an amendment to Florida Country’s campaign finance reports to change the address of a contributor to the political committee. *Id.*

2. On January 26, 2021, Commission Executive Director Tim Vaccaro sent a letter to the Complainant informing him that the complaint was found to be “Legally Insufficient” and offering him fourteen (14) days to submit additional information correcting the stated grounds for insufficiency. *See* Legal Insufficiency Letter (1/26/21) at Exh. B.

3. The Legal Insufficiency Letter recognized that Respondent had amended Florida Country’s treasurer’s report to correct a clerical error. *Id.* Amendments to campaign finance reports are legal under Florida law and are routinely filed based on clerical errors or new information received. (“Once a report is filed with the Division of Elections it cannot be edited. Any changes to a filed report must be done by filing an amendment.” *See* R. 1S-2.017, F.A.C., DS-DE 110B, 2011 Political Committee EFS Manual, p. 51, *available at*:

<https://www.flrules.org/gateway/readRefFile.asp?refId=124&filename=2011%20PC%20EFS%20Manual%20--%20DSDE%20110B.doc>).

4. On February 26, 2021, the Commission Clerk sent a letter to the undersigned stating that the Complainant had failed to provide any additional information and the case is now closed. *See* Close-Out Letter at Exh. C.

5. Respondent now petitions the Commission for an award of costs and attorney’s fees against Complainant on the grounds that the complaint was filed with a malicious intent to injure the reputation of the Respondent and with either knowledge or reckless disregard for whether the complaint contained false allegations.

6. This Petition is timely filed pursuant to Rule 2B-1.0045, Florida Administrative Code, within 30 days following the disposition of the complaint.

B. The Parties

7. In addition to his former role as treasurer for the Florida Country political committee¹, Respondent is a certified public accountant and campaign treasurer for other political organizations. Respondent was also a member of the Sarasota County School Board and a candidate for reelection at the August 2020 election. Respondent ultimately lost his race for Sarasota School Board by just four percentage points to a candidate named Tom Edwards. See [Results - Sarasota - Election Night Reporting \(clarityelections.com\)](#).

8. Complainant is a self-described “political activist.” On August 6, 2020, Complainant was paid \$2,000 for “consulting” by Tom Edwards, Respondent’s political opponent in the Sarasota School Board race. See [Sarasota County, FL : Supervisor of Elections \(sarasotavotes.com\)](#). The sworn complaint in this proceeding was signed by Complainant eight days after receiving payment from Respondent’s political opponent and only four days before the school board election on August 18, 2020. See Exh. A. at 5.

9. Although the allegations in the sworn complaint relate only to the Respondent’s actions as treasurer for the Florida Country political committee, the sworn complaint references the Respondent’s status as a candidate for the Sarasota County School Board. *Id.*

¹ The Division of Elections was notified on December 22, 2020, that Respondent resigned as the Treasurer and Registered Agent of Florida Country.

C. Other Complaints Filed by Complainant against Respondent

10. In addition to the sworn complaint filed with this Commission, Complainant also filed complaints against Respondent with the Federal Election Commission (alleging that Respondent, as treasurer for Florida Country, had accepted an improper contribution from a foreign corporation) and with the State Attorney's Office.

11. Each of these complaints were filed for political purposes to damage Respondent's personal and professional reputation and candidacy in his school board race. The sworn complaint in this proceeding admits that Complainant had issued a press release touting the filing of his Federal Election Commission complaint because he "felt it was relevant for the public to know of this conduct as Eric Robinson is a candidate for Sarasota School Board, District 3, which is an election that will be decided on August 18, 2020. . . ." See Exh. A. at 7.

12. The Complainant's filing of complaints against Respondent in the final weeks of his school board race had their desired effect, as they garnered substantial news coverage that injured Respondent's reputation and candidacy. See, e.g., [Election complaint filed over contribution in County Commission race \(heraldtribune.com\)](#); [Election contribution complaint filed in Sarasota School Board race - Pineapple Report](#); [Election complaint filed over contribution in County Commission race | News Break](#); [Sarasota school board's Robinson: Victim or violator, feds to decide | News | yoursun.com.](#); [Eric Robinson Under Investigation for Election Misconduct | Law &](#)

[Crime \(lawandcrime.com\)](http://lawandcrime.com); [Campaign treasurer under investigation for election criminal misconduct \(news-press.com\)](http://news-press.com).

13. On December 29, 2020, State Attorney Andrew Warren sent a letter to Governor Ron DeSantis advising the Governor that he had reviewed the criminal complaint filed against Respondent based on an executive assignment and concluded “[t]he State does not have evidence to prove that Eric Robinson violated Florida Statute §106(5) and thus no charges will be filed.” See Warren No File Letter to Governor DeSantis, 12/29/2020, at Exh. D.

14. Both the letter of “Legal Insufficiency” from the Commission’s Executive Director and the “No File” letter from the State Attorney recognized that Respondent’s amendment was done to correct a clerical error. And the State Attorney recognized that Respondent was “duty bound to make sure the information is correct.”

Argument

I. The Complainant is liable for payment of the Respondent’s costs and attorney’s fees incurred in defense of the Complaint.

A. Legal Standard

The Florida Election Code provides for a mandatory award of costs and attorney’s fees as a civil penalty against a person who files a false complaint with the Commission with a malicious intent to injure the reputation of the person complained against. This penalty is set forth in section 106.265(6), Florida Statutes, which states in relevant part:

In any case in which the commission determines that a person has filed a complaint against another person *with a malicious*

intent to injure the reputation of the person complained against by filing the complaint with knowledge that the complaint contains one or more false allegations or with reckless disregard for whether the complaint contains false allegations of fact material to a violation of this chapter or chapter 104, the complainant shall be liable for costs and reasonable attorney's fees incurred in the defense of the person complained against, including the costs and reasonable attorney's fees incurred in proving entitlement to and the amount of costs and fees.

(emphasis added).

Section 106.265(6) therefore provides a two-part test for the award of attorney's fees and costs to a Respondent. First, the complaint must be filed with a *malicious intent to injure the reputation of the person complained against*. Second, the complaint must be filed either *with knowledge that the complaint contains one or more false allegations* OR *filed with reckless disregard for whether the complaint contains false allegations of fact material to a violation*.

The sworn complaint filed by Complainant here readily satisfies each of these standards.

B. The Complaint was filed by the Complainant with a malicious intent to injure the reputation of the Respondent.

Complainant here filed his sworn complaint *with a malicious intent to injure the reputation* of Respondent, and his actions therefore satisfy the first prong of the two-part test set forth in section 106.265(6), Florida Statutes. In *Brown v. State, Commission on Ethics*, 969 So. 2d 553 (Fla. 1st DCA 2007), the First District interpreted identical language from the Florida Ethics Code to require a showing of malice in its "ordinary sense," that is "feelings of ill will," rather than the "actual malice" standard set forth in

New York Times v. Sullivan. “Such proof may be established indirectly, i.e., ‘by proving a series of acts which, in their context or in light of the totality of surrounding circumstances, are inconsistent with the premise of a reasonable man pursuing a lawful objective, but rather indicate a plan or course of conduct motivated by spite, ill-will, or other bad motive.’” *McCurdy v. Collins*, 508 So. 2d 380, 382 (Fla. 1st DCA 1987) (quoting *S. Bell Tel. & Tel. Co. v. Roper*, 482 So. 2d 538, 539 (Fla. 3d DCA 1986)); see also *McLaughlin v. Richter*, Case No. 16-5244FE at ¶¶ 52-54 (Fla. DOAH Sept. 21, 2017) (Recommended Order), adopted in toto No. 14-230 (Fla. Comm’n on Ethics Dec. 13, 2017) (Final Order COE 17-124) (granting petition for costs and attorney’s fees in the amount of \$63,110.61)

Complainant’s malicious intent to injure Respondent’s reputation is evident from the face of the sworn complaint, which prominently references the Respondent’s candidacy for the Sarasota County School Board—a matter that is entirely irrelevant to the allegation that Respondent, as campaign treasurer for an unrelated political committee, had willfully and falsely certified the correctness of a committee treasurer’s report. The sworn complaint itself also admits that the Complainant had sought out media attention regarding his false complaints in the final weeks of Respondent’s school board race. The circumstances surrounding the filing of the sworn complaint also demonstrate the Complainant’s malicious intent to injure the Respondent’s reputation, including the fact that the Complainant was paid \$2,000 by Respondent’s political opponent for “consulting” eight days before Complainant signed the sworn complaint.

As noted above, the Complainant's actions in filing a false sworn complaint had their desired effect, as Respondent's reputation and candidacy were injured based on the Complainant's false allegations that the Respondent had committed criminal violations. As Respondent is a certified public accountant and provides campaign and committee treasurer services to other political organizations, a false sworn complaint that he has engaged in criminal violations of the Florida Election Code was also calculated by Complainant to target and damage Respondent's professional reputation.

Considering the context and totality of the surrounding circumstances, the Complainant's actions in filing a false sworn complaint against the Respondent to injure his reputation both professionally and as a candidate on the eve of the school board election indicate a plan or course of action motivated by "spite, ill-will, or other bad motive" rather than the actions of a reasonable person pursuing a lawful objective.

C. The Complaint was filed by the Complainant with either knowledge or reckless disregard for whether it contained one or more false allegations of fact material to a violation of Chapter 106.

Complainant's actions also satisfy the second prong of the two-part test under section 106.265(6), Florida Statutes, because he filed the sworn complaint with either *knowledge* that it contained false allegations or, at least, with *reckless disregard* for whether the sworn complaint contained false allegations of fact material to a violation of Chapter 106. As with "malicious intent," the statutory term "reckless disregard for whether the complaint contains false allegations" is interpreted according to its ordinary sense: "conscious indifference to the truth." *Brown*, 969 So. 2d at 559; *see also id.* at 557 (stating that there was "no doubt" that political opponents had acted "recklessly,

as we would ordinarily use that term” by filing sworn ethics complaints alleging public corruption without any investigation of the facts or legitimate reason to believe the allegations were true).

Complainant here filed his sworn complaint with either knowledge or reckless disregard for whether it contained false allegations of fact material to a violation of chapter 106. The sworn complaint alleges that Respondent’s actions in filing an amendment to Florida Country’s campaign finance report to correct the address of a contributor to the political committee constituted a criminal act: the willful certification of a campaign finance report by a treasurer while *knowing* that the report is incorrect, false, or incomplete. The sworn complaint therefore falsely alleged, at least, the following material facts: 1) that the contributor’s address as listed in Florida Country’s amended campaign finance report was “incorrect and/or false”; 2) that the publicly filed campaign finance report amendment “improperly changed the address” and “attempted to obscure the donation”; and 3) that Respondent had *knowingly* certified a false or incorrect campaign finance report for Florida Country.

The sworn complaint does not assert that Complainant undertook a reasonable inquiry before leveling these allegations of criminal conduct against Respondent. Instead, the Complainant states that his sworn complaint is based on “knowledge I have obtained from filing the Federal complaint and related media coverage.” Exh. A at 7. In other words, Complainant’s allegations were based on nothing more than his own beliefs and media reports generated by press coverage he himself had generated in an attempt to damage the reputation and political candidacy of Respondent. Without any

investigation, based only on the fact that Respondent had filed an amendment to a campaign treasurer's report, Complainant made a wild and reckless leap to the conclusion that Respondent had willfully certified to the correctness of the amended campaign treasurer's report while knowing the report was incorrect or false. Under these circumstances, Complainant unquestionably acted at least recklessly – with a “conscious indifference to the truth” – by filing a sworn elections complaint alleging that Respondent had committed criminal violations of the Florida Election Code.

II. Respondent is entitled to an award of costs and reasonable attorney's fees incurred in defense of the sworn complaint.

If this Commission determines that the statutory criteria are satisfied, an award of costs and reasonable attorney's fees against Complainant is a non-discretionary civil penalty. *See* § 106.262(6), Fla. Stat. (providing that the complainant “shall be liable” in “any case” in which the Commission makes the requisite determinations). A complainant's liability for costs and reasonable attorney's fees includes “the costs and reasonable attorney's fees incurred in proving entitlement to and the amount of costs and fees.” *Id.*

As a result of Complainant's malicious, false, and reckless allegations, Respondent's reputation and political career have been injured. Respondent has retained legal counsel to defend against the sworn complaint and has already incurred substantial legal fees in defense of the sworn complaint's false allegations. The amount of costs and reasonable attorney's fees will continue to accrue as Respondent

demonstrates his entitlement to and the amount of costs and fees for which Complainant should be held liable.

Conclusion

As in *Brown v. State, Commission on Ethics*, 969 So. 2d at 560, the Complainant here “drew [Respondent] into the legal system involuntarily.” After the Commission found the sworn complaint to be legally insufficient, Respondent is now “merely trying to recover the costs and expenses he incurred in defending himself” against a false and malicious complaint intended to injure his reputation.

WHEREFORE, Respondent respectfully requests the Commission to enter an Order pursuant to section 106.265(6), Florida Statutes, and Rule 2B-1.0045, Florida Administrative Code:

1. Finding the Petition states a prima facie case that Complainant is liable for the costs and reasonable attorney’s fees incurred in defense of Respondent, including the costs and reasonable attorney’s fees incurred in proving entitlement to and the amount of costs and fees;
2. Setting a hearing involving any disputed issues of material fact before the Commission, a Commissioner, or the Division of Administrative Hearings for the entry of a recommended order determining whether Respondent is entitled to an award of attorney’s fees and costs and, if so, what amount is due;
3. Providing that if Complainant fails to pay costs and fees awarded by the Commission voluntarily within 30 days, the information will be forwarded to the Department of Legal Affairs for the filing of a civil action in a court of competent jurisdiction to recover the amount of costs and fees awarded by the Commission; and
4. Granting any other relief as it deems fit.

Dated: March 26, 2021

Respectfully submitted,

/s/ Benjamin J. Gibson

Benjamin J. Gibson

Fla. Bar No.: 058661

SHUTTS & BOWEN LLP

215 S. Monroe Street, Suite 804

Tallahassee, Florida 32301

Telephone: (850) 241-1717

Email: bgibson@shutts.com

Counsel for Respondent

CERTIFICATE OF SERVICE

I hereby certify that this Petition was filed with the Agency Clerk, Florida
Elections Commission, via electronic mail fec@myfloridalegal.com on March 26, 2021.

/s/ Benjamin J. Gibson
Benjamin J. Gibson

EXHIBIT A



Florida Elections Commission

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



August 24, 2020

CERTIFIED MAIL 9214 8969 0099 9790 1634 8782 77

Eric Robinson
133 Harbor Dr. S.
Venice, FL 34285

RE: Case No.: FEC 20-295; Respondent: Eric Robinson

Dear Mr. Robinson:

On August 21, 2020, the Florida Elections Commission received the enclosed complaint alleging that you violated Florida's election laws. Section 106.25(2), Florida Statutes, states:

The respondent shall have 14 day *after receipt* of the complaint to file an initial response, and the executive director may not determine the legal sufficiency of the complaint during that time period.

Should you choose to file a response to the complaint, please send it to my attention at the address listed above. You may also send your response to my attention at fec@myfloridalegal.com. You will be notified by letter whether the complaint is determined to be legally sufficient.

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

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

Should you retain counsel, your attorney must file a notice of appearance with the Commission before any member of the commission staff can discuss this case with him or her.

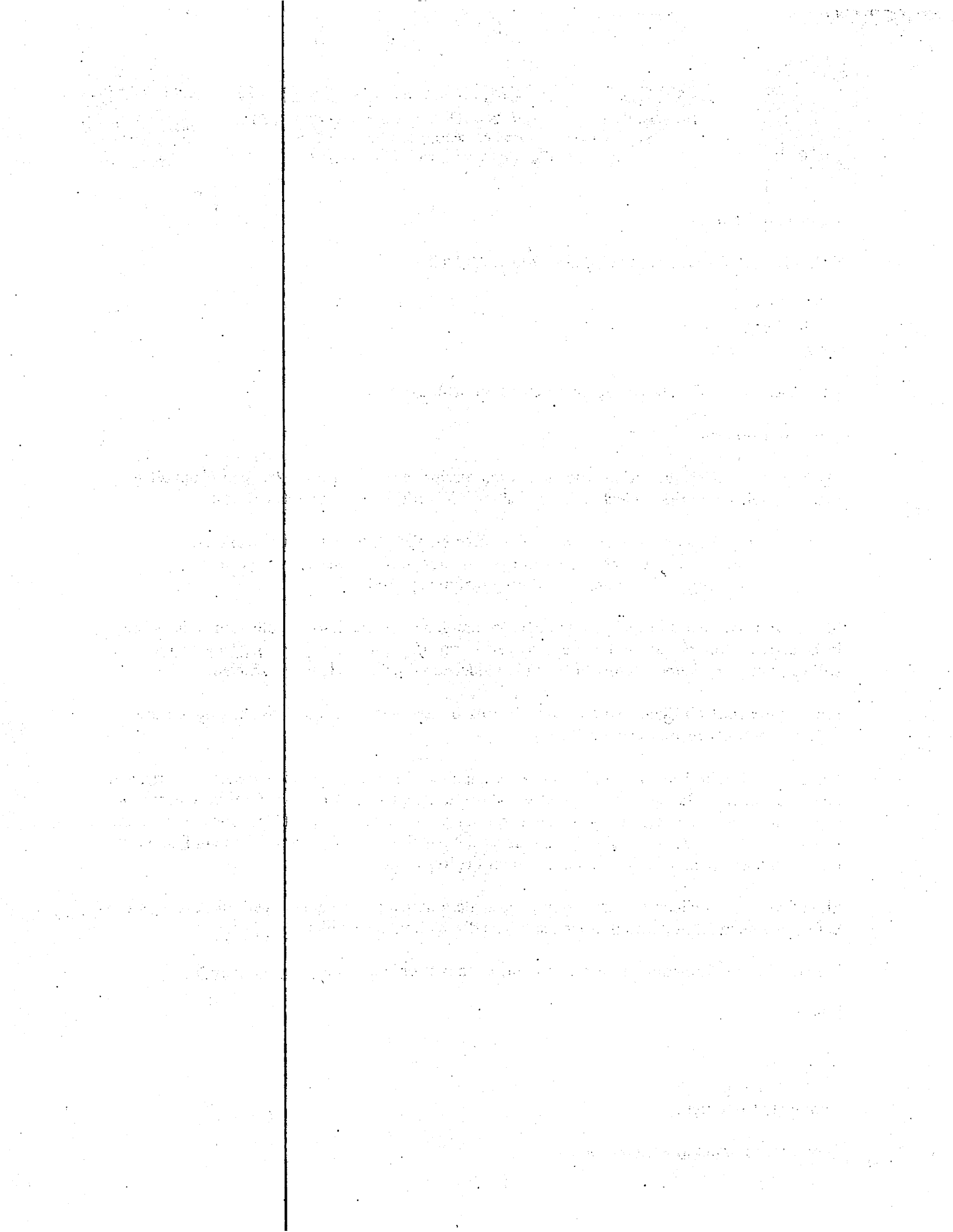
For additional information, please refer to the Commission's website www.fec.state.fl.us.

Sincerely,

Molly Donovan

Molly Donovan
Complaint Coordinator

Enclosure: Complaint w/ attachments



COMPLAINT

The Commission's records and proceedings in a case are confidential until the Commission rules on probable cause. A copy of the complaint will be provided to the person against whom it is brought.

1. PERSON BRINGING COMPLAINT:

Name: George Thurlow Work Phone: ()
Address: 1302 52nd St. S. Home Phone: (727) 685-9719
City: Gulfport County: Pinellas State: FL Zip Code: 33707

2. PERSON AGAINST WHOM COMPLAINT IS BROUGHT:

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

Name of individual or entity: Eric Robinson
Address: 133 Harbor Dr. S. Phone: (941) 488-7794
City: Venice County: Sarasota State: FL Zip Code: 34285

If individual is a candidate, list the office or position sought: Sarasota County School Board, District 3

Have you filed this complaint with the State Attorney's Office? (check one) Yes No
Are you alleging a violation of Section 104.271(2), F.S.? (check one) Yes No
Are you alleging a violation of Section 104.2715, F.S.? (check one) Yes No

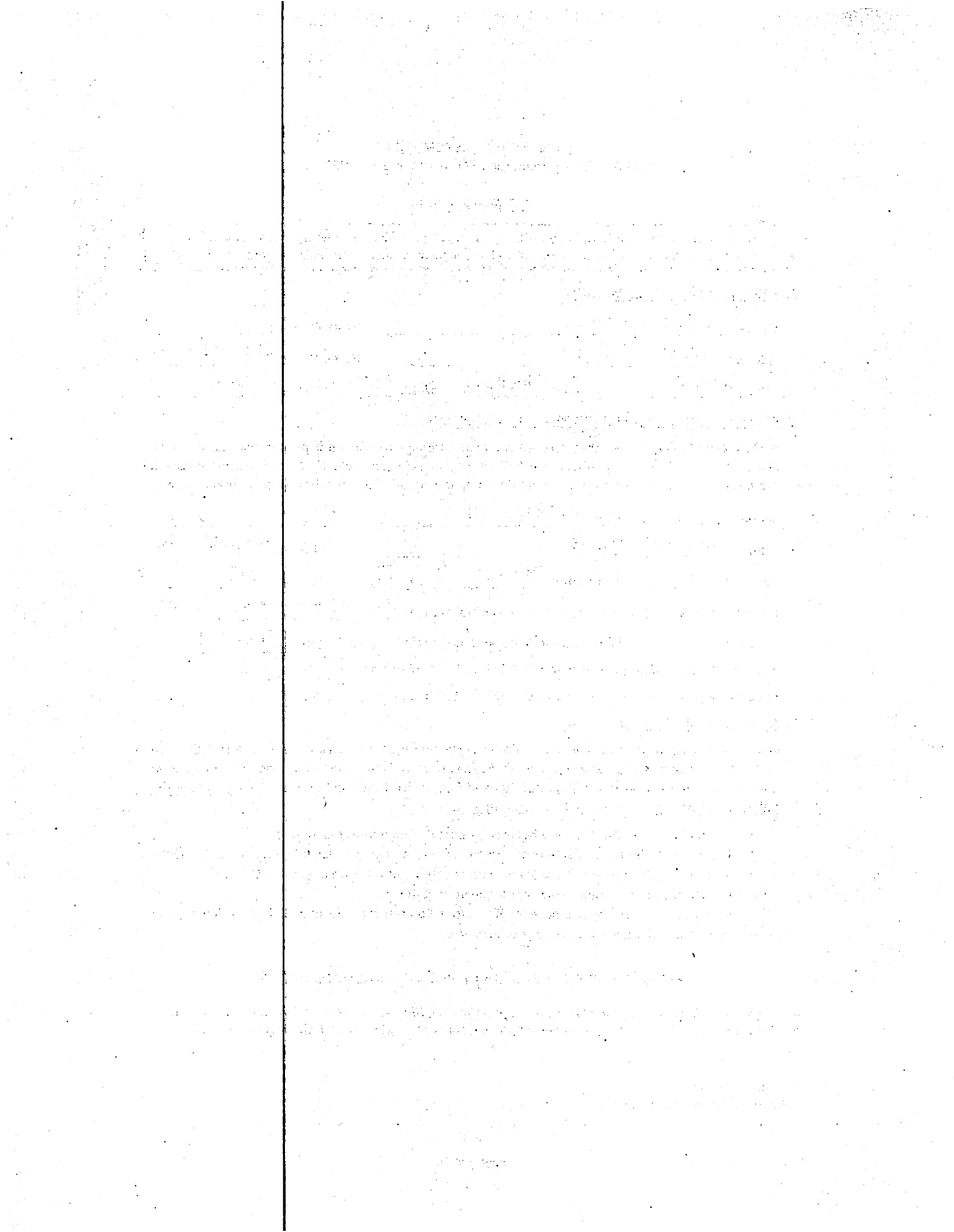
3. ALLEGED VIOLATION(S):

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

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

SEE REVERSE SIDE OF DOCUMENT FOR ADDITIONAL INFORMATION

*Any person who files a complaint while **knowing** that the allegations are false or without merit commits a misdemeanor of the first degree, punishable as provided in Sections 775.082 and 775.083, Florida Statutes.*



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

REC'D: FL ELECTIONS COM
21 AUG '20 AM 10:38

4. **OATH:**

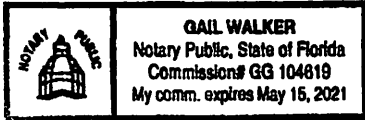
STATE OF FLORIDA
COUNTY OF Pinellas

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

Original Signature of Person Bringing Complaint

Sworn to and subscribed before me this 14 day of
August, 2020

Signature of Officer Authorized to Administer Oaths or Notary Public



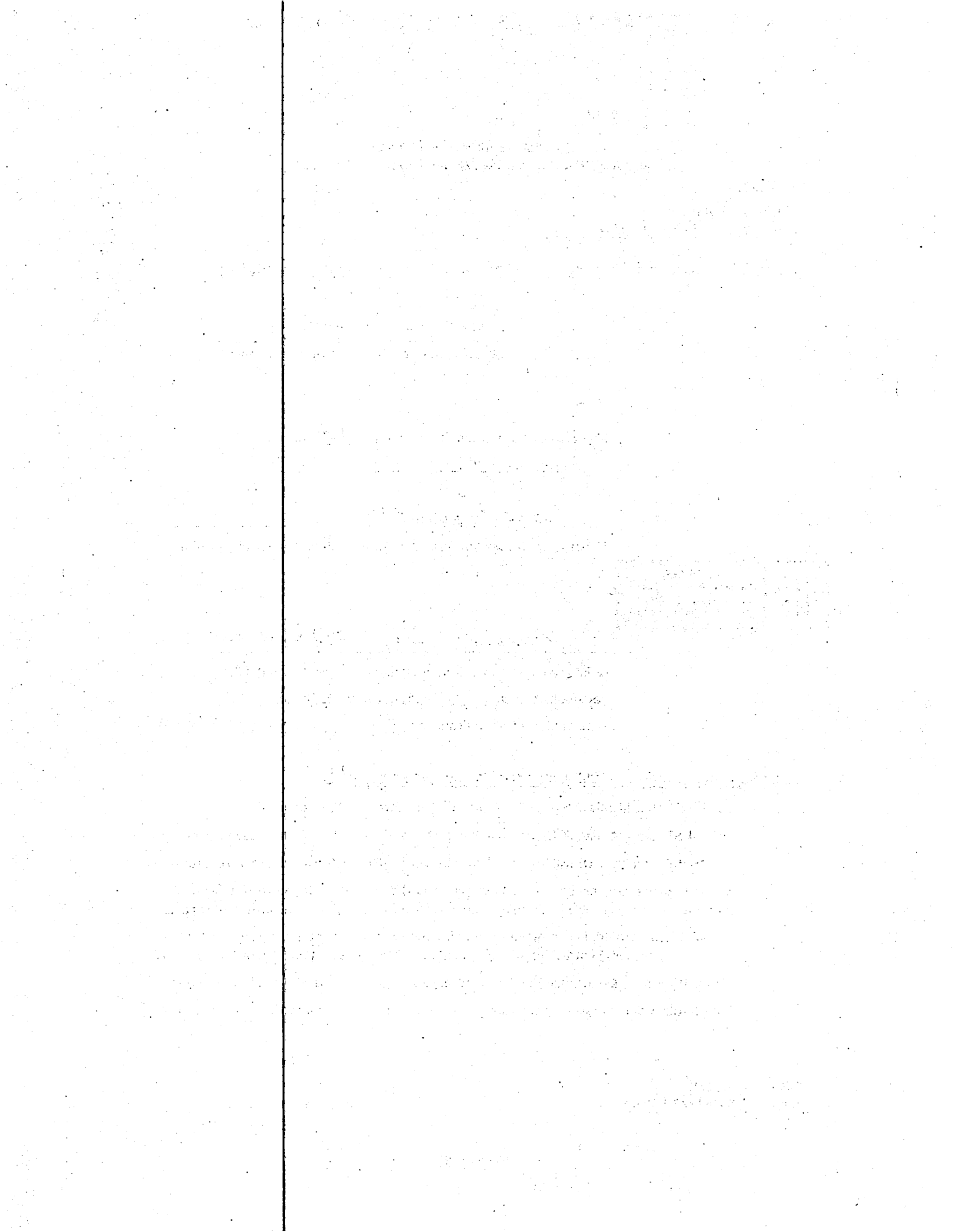
(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known _____ Or Produced Identification X

Type of Identification Produced Florida Driver License

5. **IMPROPERLY COMPLETED COMPLAINT FORMS MAY BE RETURNED:**

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



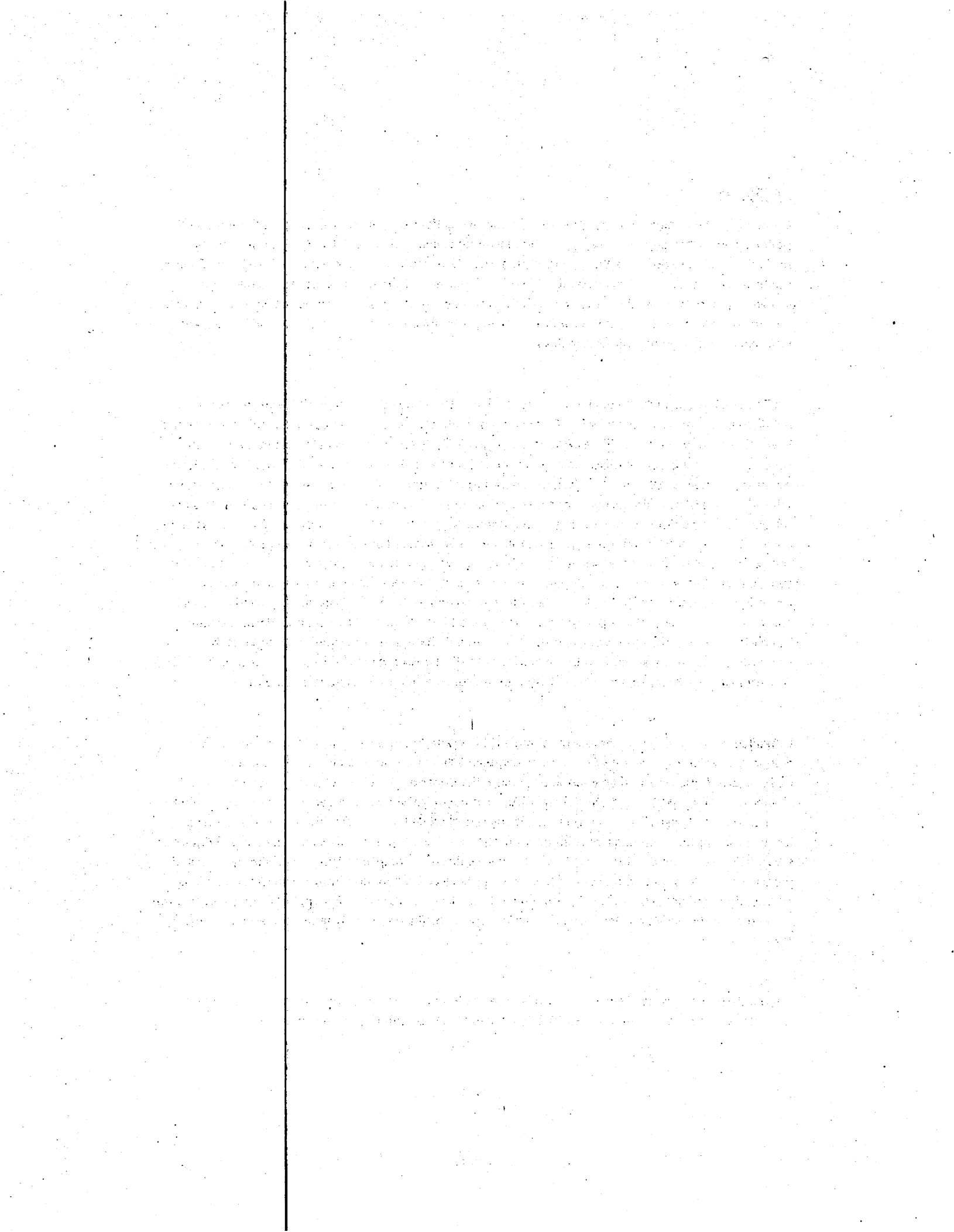
NARRATIVE:

On July 28, 2020, I filed a complaint with the Federal Elections Commission against the Florida Country political committee and its Treasurer Eric Robinson for a violation of 52 USC § 30121, a statute that prohibits foreign nationals making contributions in federal, state, or local elections. The Florida Country political committee accepted a contribution from Queensgate Homes Inc., a real estate developer incorporated in the Canadian province of Ontario and owned by Fausto Palombo, a Canadian national. The Federal Elections Commission confirmed receipt of this complaint, and that it would be forwarded to Robinson for response within five days.

On Thursday, August 6th, 2020, I issued a press release about my complaint. I felt it was relevant for the public to know of this conduct as Eric Robinson is a candidate for Sarasota County School Board, District 3, which is an election that will be decided on August 18th, 2020, and that Florida Country has been sending mailers that praise Mike Moran, a candidate for Sarasota County Commission, District 1, facing a primary on August 18th, 2020. It should be noted that Mr. Robinson also serves as Moran's Campaign Treasurer, and Moran directs his campaign contributions to Mr. Robinson's accounting office. This press release did not get immediate coverage. On Monday, August 10th, 2020, the *Sarasota Phoenix*, an online newsletter operated by community activist Jon Susce spread word of the fact that I had filed the complaint. Shortly after Susce emailed out this news, I was contacted by someone who noticed that the contribution that was listed from Queensgate Homes Inc. at an Ontario address had since been amended to Queensgate Homes Inc.—Vensota with an address at a UPS Store in Lakewood Ranch, FL. This amendment was picked up in the coverage by the *Sarasota Herald-Tribune* and *North Port Sun*. Since Mr. Palombo, the owner of Queensgate Homes Inc., has another business named Vensota Properties, Inc., which is incorporated in Florida at that Lakewood Ranch address, the reporter for the *Sarasota Herald-Tribune* inaccurately attributed the contribution to Vensota Properties Inc.

I am alleging that by filing an amendment to Florida Country's campaign finance reports in direct response to a Federal Elections Commission complaint that improperly changed the address of Queensgate Homes Inc. and attempted to obscure the donation, that Eric Robinson appears to have violated Fla. Stat. § 106.07(5), which states "Any campaign treasurer, candidate, or political committee chair who willfully certifies the correctness of any report while knowing that such report is incorrect, false, or incomplete commits a misdemeanor of the first degree, punishable as provided in s. 775.082 or s. 775.083." Based on the *Sarasota Herald-Tribune* report that Robinson "said he had simply recorded the transaction and that no one would have known there was a donation from a firm with a Canadian address if he had not reported it," by amending the address to Lakewood Ranch, he willfully certified the correctness of incorrect and/or false information. This behavior would also seem to violate Fla. Stat. § 106.19.

I am filing this complaint based on knowledge I have obtained from filing the Federal complaint and related media coverage. Persons with additional knowledge on this matter may include:



Wendi Leach
Chair of Florida Country
133 Harbor Drive S.
Venice, FL 34285
(941)488-7794

The Honorable Michael A. Moran
Candidate for Sarasota County Commission,
District 1
5572 Chanteclair
Sarasota, FL 34235
(941)400-1140

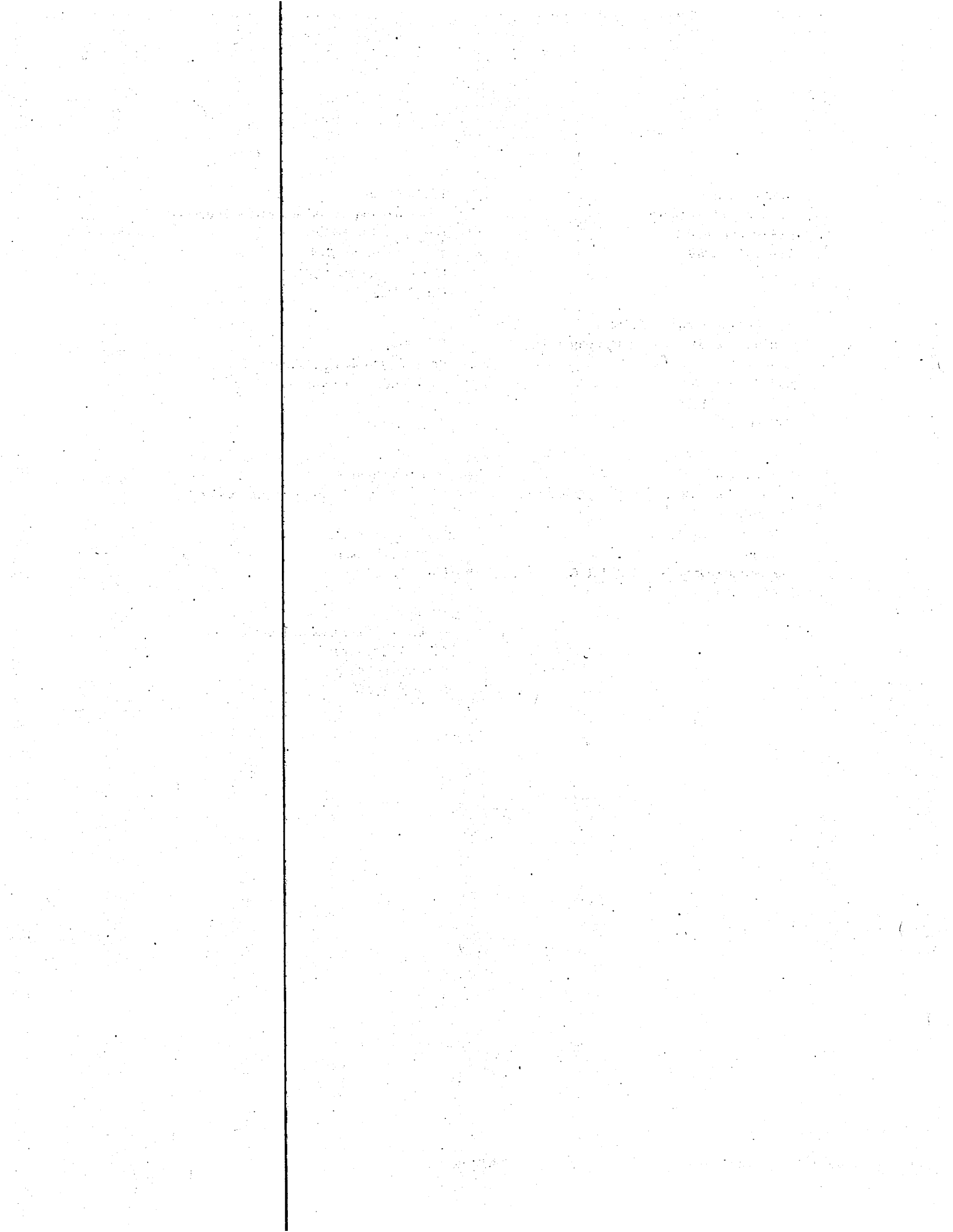
Fausto Palombo
Owner of Queensgate Homes Inc. & Vensota
Properties Inc.
3800 Steeles Ave. W.
Suite 400
Woodbridge, Ontario, Canada L4L4G9
(905)264-0600

The UPS Store
Location of the revised address for Queensgate
Homes Inc.—Vensota
11523 Palmbrush Trail
Lakewood Ranch, FL 34202
(941)751-6245

SunTrust Bank
Depository for Florida Country
1670 South Venice Bypass
Venice, FL 34293
(941)882-5616

Ryan McKinnon
Education Reporter for the *Sarasota Herald-
Tribune*
1777 Main Street
Sarasota, FL 34236
(703)772-0123

Jon Susce
Publisher of the *Sarasota Phoenix*
2570 10th Street #105
Sarasota, FL 34237
(941)822-1121



George Thurlow
1302 52nd Street South
Gulfport, FL 33707
George.thurlow@outlook.com
Cell: (727)685-9719

July 28, 2020

Office of General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

To Whom It May Concern:

I wish to file a complaint against the following political committee and its officers:

Florida Country, *a registered political committee in the State of Florida*
Wendi Leach, Chair of Florida Country
Eric Robinson, Treasurer of Florida Country
133 Harbor Drive South
Venice, FL 34285

I am filing this complaint based on information I learned from public campaign finance reports. On April 21, 2020, Florida Country, the aforementioned political committee, accepted a contribution of \$2,500 from Queensgate Homes Inc., a corporation that appears to be domiciled in Canada (the reported address of Queensgate Homes Inc. is 400-3800 Steeles Ave. W., Woodbridge, Ontario, Canada). Despite this contribution being made to a state-level political committee, I believe it to be a violation of 52 USC § 30121 which prohibits foreign nationals in connection with a state or local election. Contributions to a state-level political committee are implicitly made in connection with state and local elections. Florida Country's attempts to participate in state and local elections is further evidenced by its spending \$24,215.97 on direct mail between June 30th and July 28th—all when vote by mail ballots for Florida's August 18th primary were mailed in Sarasota County, the base of this political committee, starting on July 2nd.

I have attached copies of Florida Country's organizational documents and copies of the aforementioned campaign finance reports to this Complaint.

If there are any additional questions regarding this complaint, I can be reached at the contact information above.

Sincerely,



George Thurlow

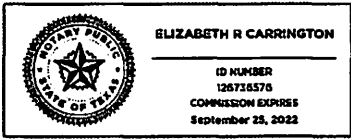
OATH

STATE OF Texas
COUNTY OF Montgomery

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

George Albert Doyle Thurlow
Original Signature of Person Bringing Complaint

Sworn to and subscribed before me this 28 day of
July, 20 20

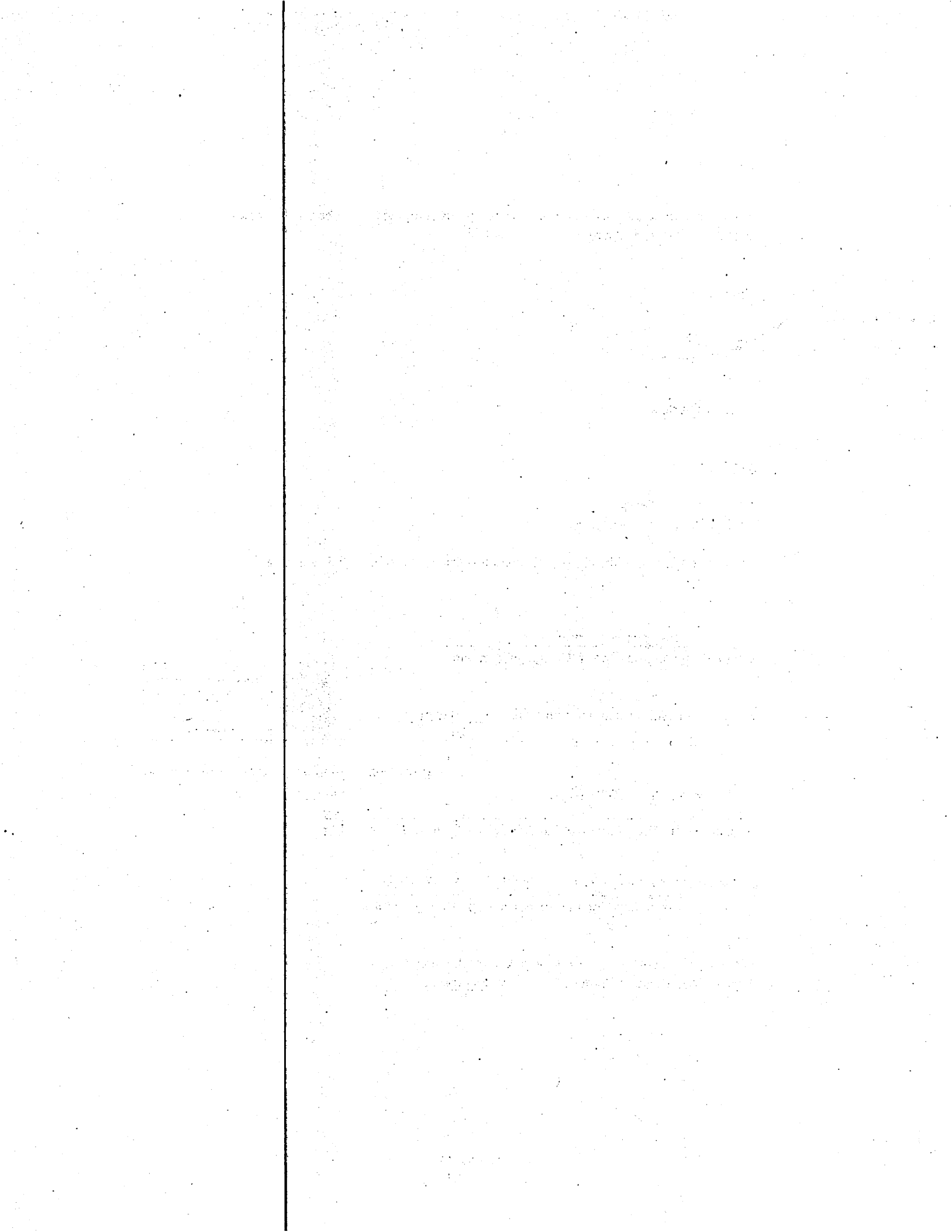


Notarized online using audio-video communication

Elizabeth R Carrington
Signature of Officer Authorized to Administer Oaths or Notary Public

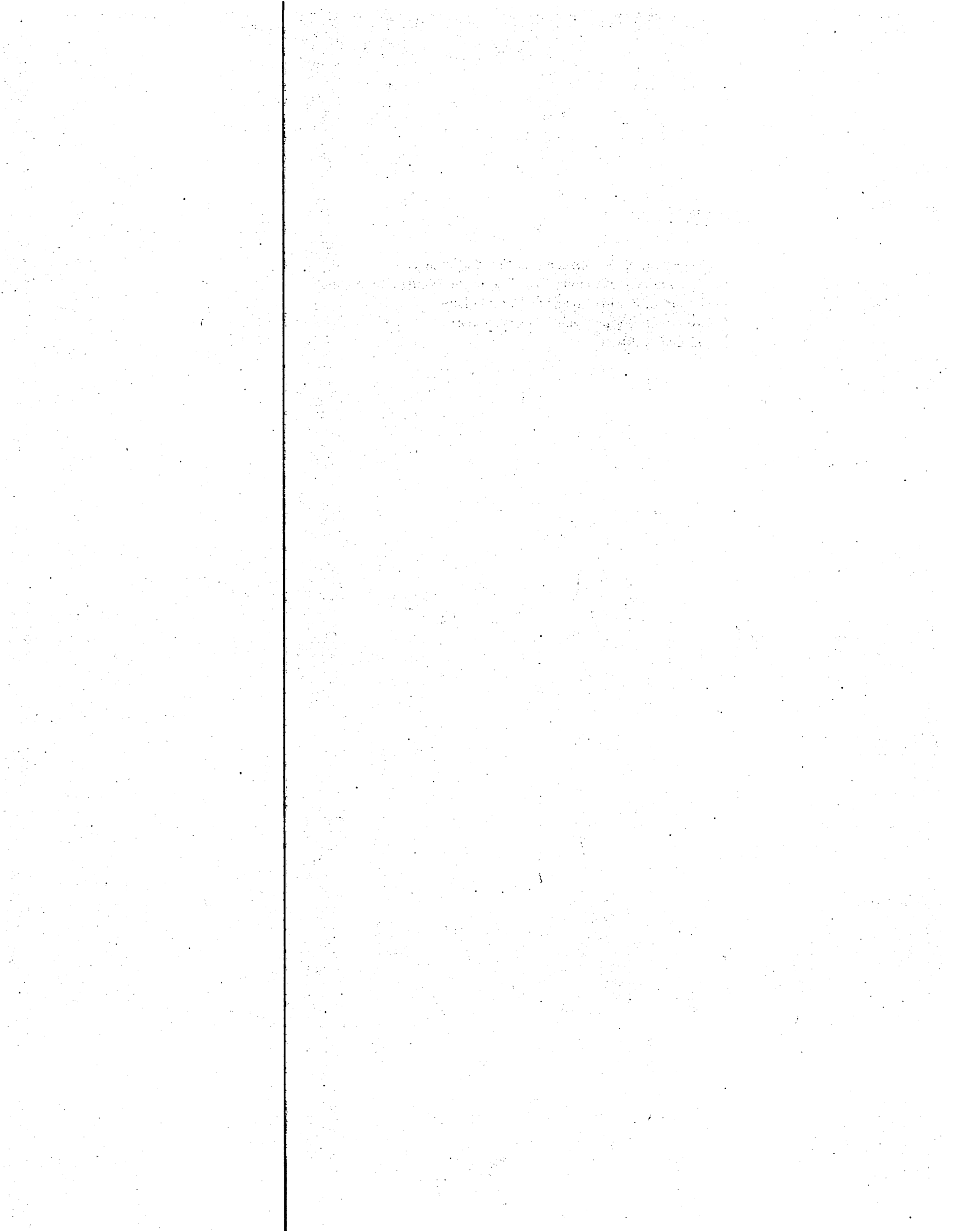
ELIZABETH R CARRINGTON Electronic Notary Public
(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known _____ Or Produced Identification ✓
Type of Identification Produced Drivers License

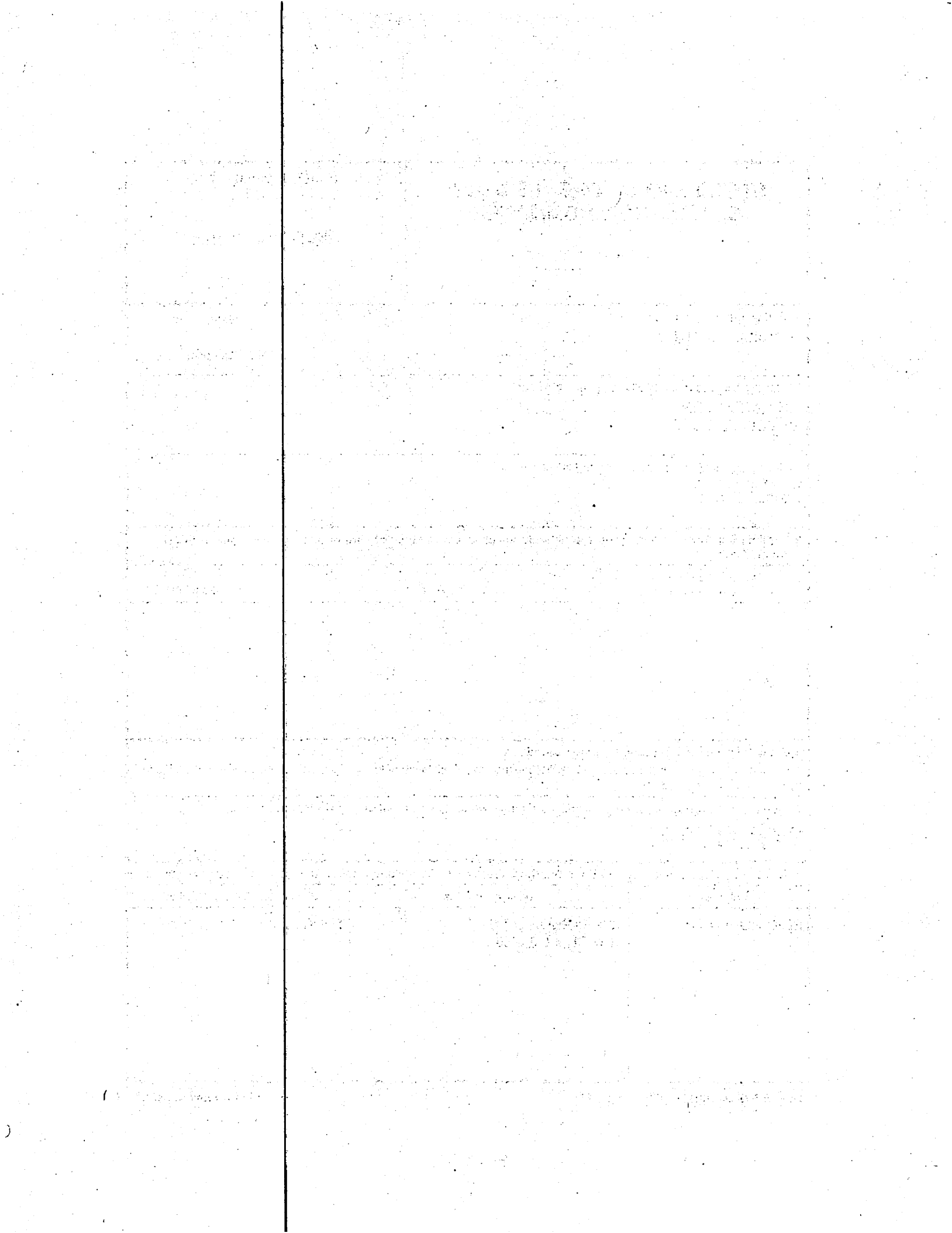


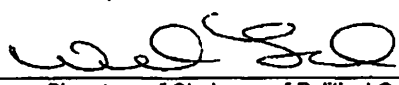
EXHIBITS:

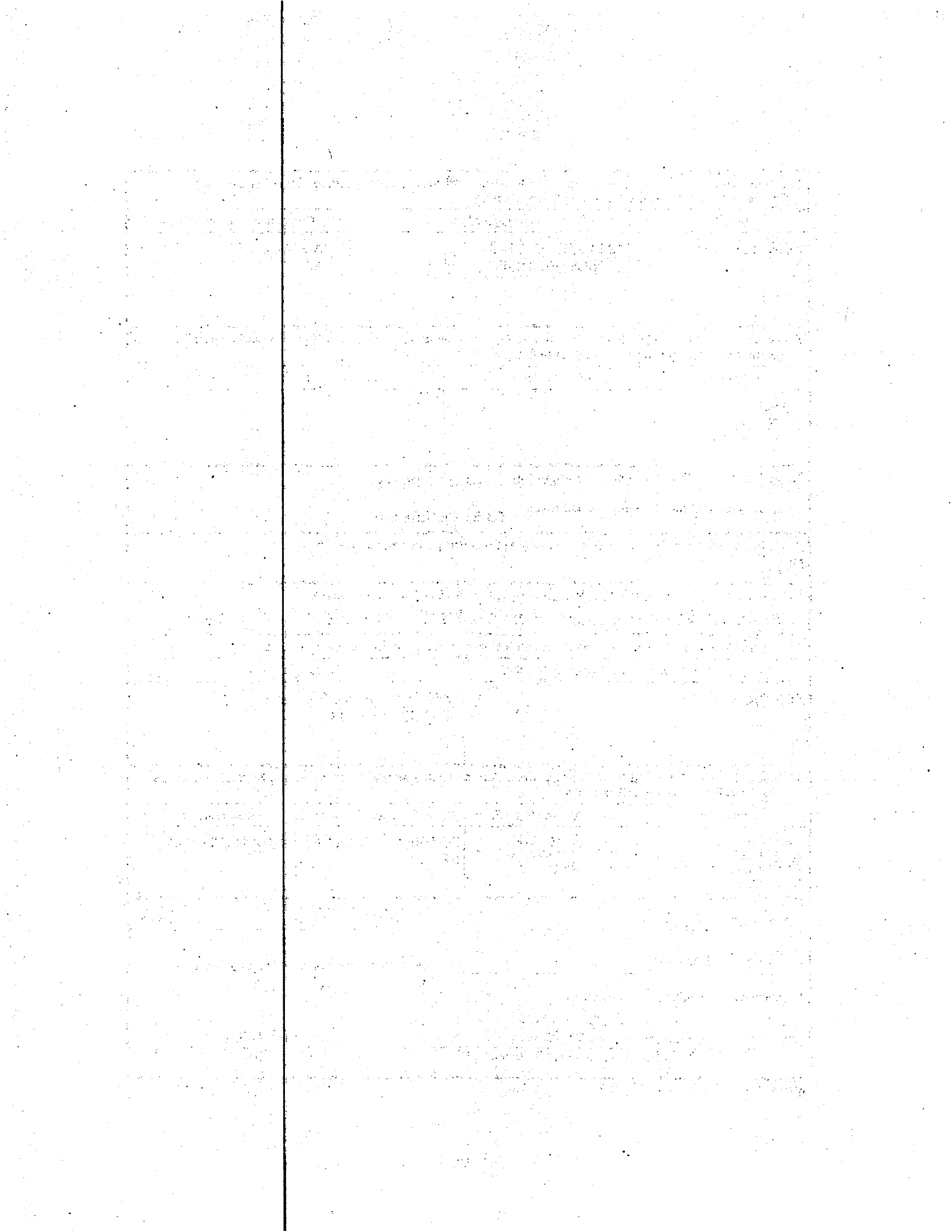
- (1) Statement of Organization for Florida Country
- (2) Appointment of Campaign Treasurer for Florida Country
- (3) Report of Florida Country's Contributions
- (4) Report of Florida Country's Expenditures
- (5) 52 USC § 30121



STATEMENT OF ORGANIZATION OF POLITICAL COMMITTEE		OFFICE USE ONLY RECEIVED 2020 FEB 14 AM 11:50
(PLEASE TYPE)		
1. Full Name of Committee FLORIDA COUNTRY		Telephone 941-200-6551
Mailing Address (include city, state and zip code) 133 HARBOR DR S VENICE, FL 34285		
Street Address (include city, state and zip code) 133 HARBOR DR S VENICE, FL 34285		
2. Affiliated or Connected Organizations (includes other committees of continuous existence and political committees)		
Name of Affiliated or Connected Organization	Mailing Address	Relationship
N/A		
3. Area, Scope and Jurisdiction of the Committee To support or oppose candidates for statewide, multi-county, legislative or local office and other activities not prohibited by Chapter 106 Florida Statute.		
4. Nature of Organization or Organization's Special Interest (e.g., medical, legal, education, etc.) POLITICAL		
5. Identify by Name, Address and Position, the Custodian of Books and Accounts (include treasurer's name)		
Full Name	Mailing Address	Committee Title or Position
ERIC ROBINSON	133 HARBOR DR S VENICE, FL 34285	TREASURER



6. List by Name, Address and Position, Other Principal Officers, Including Officers and Members of the Finance Committee, if Any (include chairman's name)			
Full Name	Mailing Address	Committee Title or Position	
WENDI LEACH	133 HARBOR DR-S VENICE, FL 34285	CHAIRMAN	
7. List by Name, Address, Office Sought and Party Affiliation Each Candidate or Other Individual that this Committee is Supporting (if none, please indicate)			
Full Name	Mailing Address	Office Sought	Party
TO BE DETERMINED			
8. List Any Issues this Committee is Supporting: TO BE DETERMINED			
List Any Issues this Committee is Opposing: TO BE DETERMINED			
9. If this Committee is Supporting the Entire Ticket of a Party, Give Name of Party			
N/A			
10. In the Event of Dissolution, What Disposition will be Made of Residual Funds?			
Contribute to Candidates, Political Parties, Political Committees			
11. List all Banks, Safety Deposit Boxes, or Other Depositories Used for Committee Funds			
Name of Bank or Depository & Account Number	Mailing Address		
SUNTRUST BANK	1670 South Venice Bypass VENICE, FL 34293		
12. List all Reports Required to be Filed by this Committee with Federal Officials and the Names, Addresses and Positions of Such Officials, if Any			
Report Title	Dates Required to be Filed	Name & Position of Official	Mailing Address
FORM 8871 FORM 1120POL FORM 990 AS MAY BE REQUIRED	UPON FORMATION MAR 15-ANNUALLY MAY 15-ANNUALLY	INTERNAL REVENUE SERVICE	OGDEN UT 84201
STATE OF <u>FLORIDA</u>		<u>SARASOTA</u> COUNTY	
I, <u>WENDI LEACH</u> , certify that the information in this Statement of			
Organization is complete, true and correct.			
<input checked="" type="checkbox"/> <u></u>		<u>2-11-2020</u>	
Signature of Chairman of Political Committee		Date	



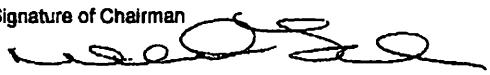
**APPOINTMENT OF CAMPAIGN TREASURER
AND DESIGNATION OF CAMPAIGN
DEPOSITORY FOR
POLITICAL COMMITTEES**
(Sections 106.011(1) and 106.021(1), F.S.)

RECEIVED
DEPARTMENT OF
2020 FEB 14 AM 11:50
STATE TREASURER

CHECK APPROPRIATE BOX:

OFFICE USE ONLY

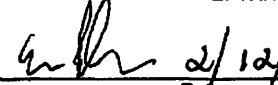
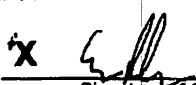
Original Appointment of Treasurer Reappointment of Treasurer Deputy Treasurer

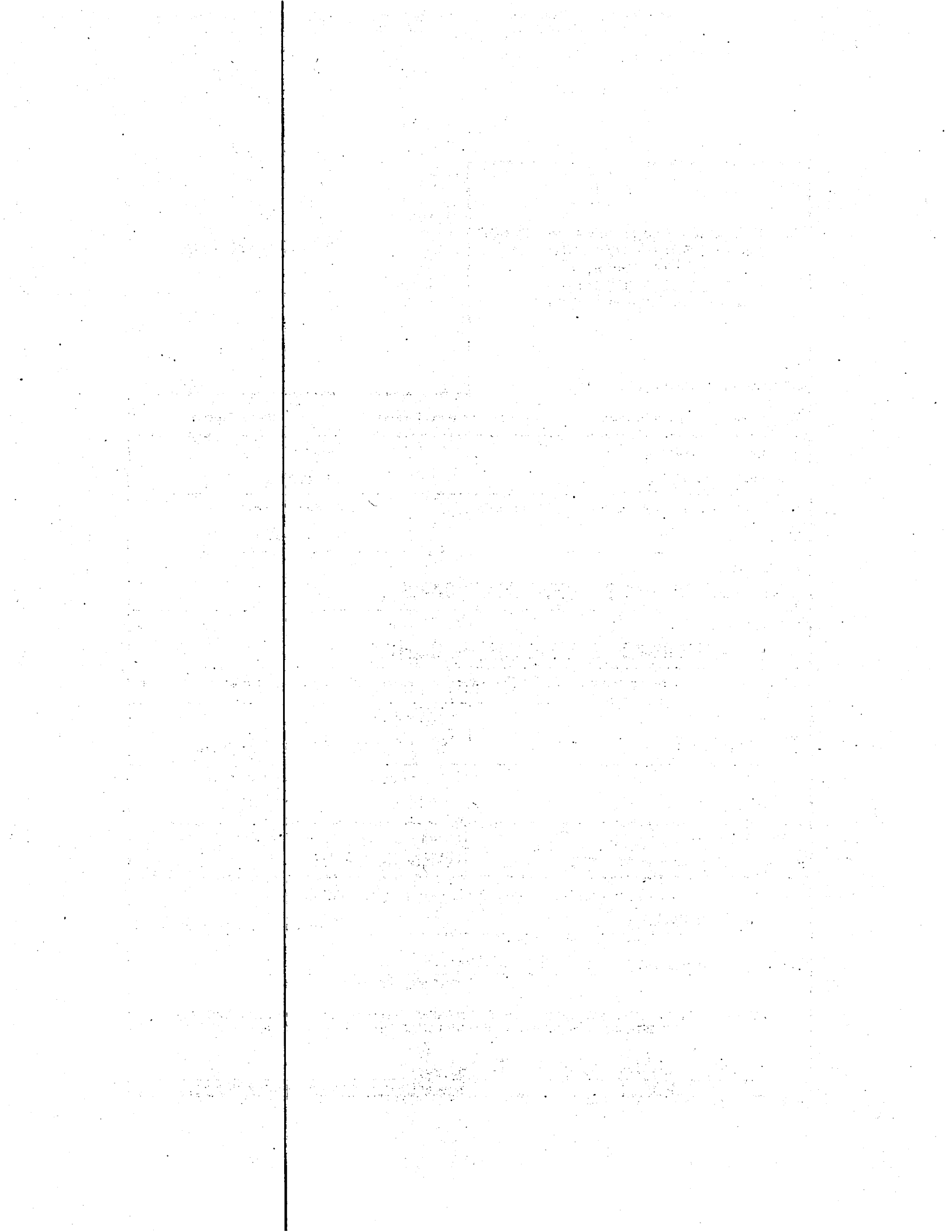
1. Committee or Organization FLORIDA COUNTRY		2. Telephone (941) 200-6551	
3. Name of Treasurer or Deputy Treasurer ERIC ROBINSON		4. Email (optional)	
5. Telephone (optional) (941) 200-6551		6. Mailing Address 133 HARBOR DR S VENICE, FL 34285	
7. Street Address 133 HARBOR DR S VENICE, FL 34285			
8. The following bank has been designated as the <input checked="" type="checkbox"/> Primary Depository <input type="checkbox"/> Secondary Depository			
9. Name of Bank SUNTRUST		10. Street Address 1670 South Venice Bypass	
11. City VENICE		12. State FL	13. Zip Code 34293
14. Signature of Chairman 		15. Name of Chairman (Print or Type) WENDI LEACH	

Campaign Treasurer's Acceptance of Appointment

I, **ERIC ROBINSON**, do hereby accept the appointment as
(Please Print or Type)
treasurer or deputy treasurer for **FLORIDA COUNTRY**
(Committee or Organization)

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

 2/12/2020 
Date Signature of Campaign Treasurer or Deputy Treasurer





Florida Department of State
Division of Elections

Campaign Contributions

Florida Country

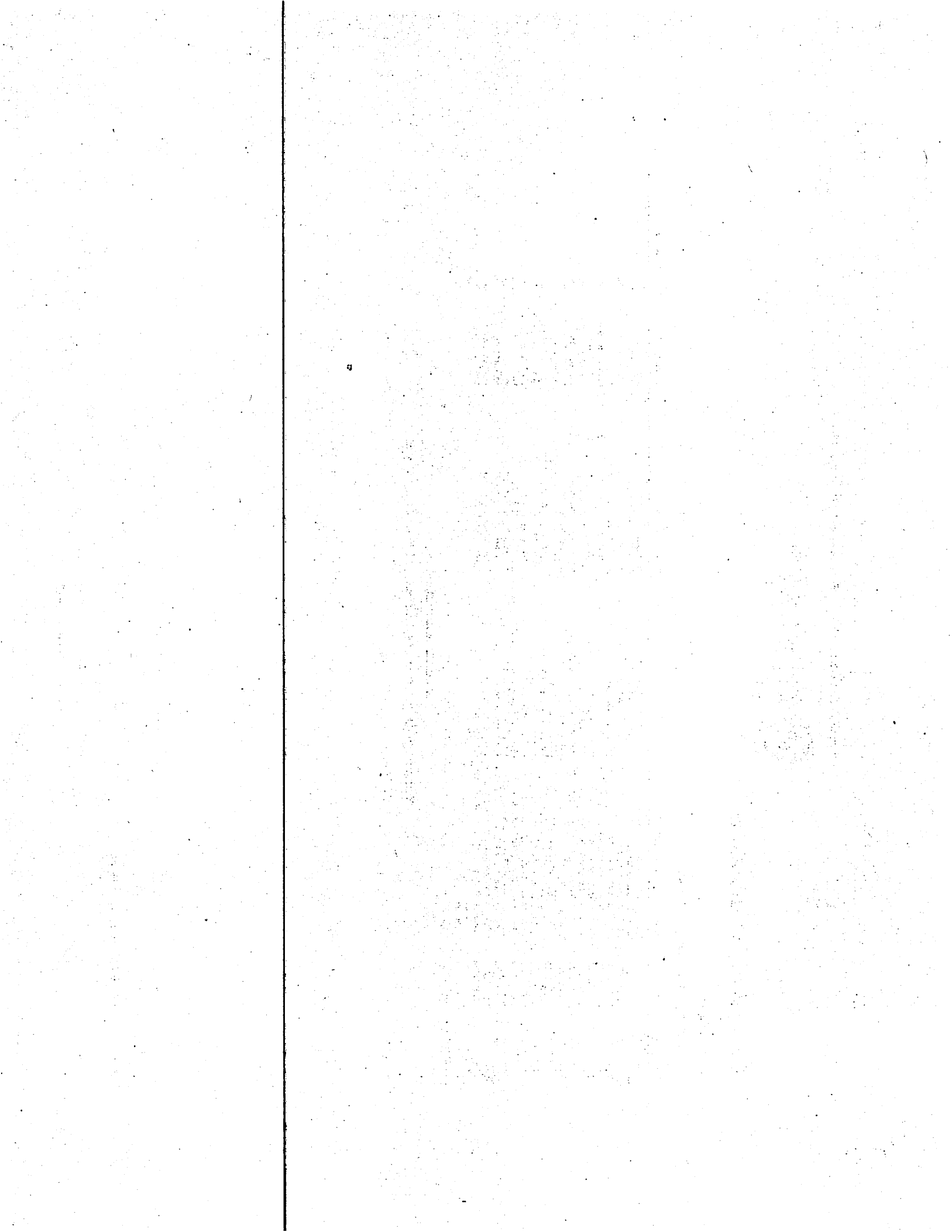
[About the Campaign Finance Data Base](#)

Rpt Yr	Rpt Type	Date	Amount	Contributor Name	Address	City State Zip	Occupation	Typ InKind Desc
2020	M3	03/04/2020	5,000.00	GABBERT INVESTMENT GROUP LLC	1216 HIDDEN HARBOR WAY	SARASOTA, FL 34242	FINANCE SERVICES	CHE
2020	M3	03/06/2020	5,000.00	MEDRED ROBERT	5972 RIVER FOREST CIR	BRADENTON, FL 34203	REAL ESTATE	CHE
2020	M3	03/10/2020	5,000.00	SABA WILLIAM	240 S PINEAPPLE AVE STE 702	SARASOTA, FL 34236	ATTORNEY	CHE
2020	M3	03/13/2020	5,000.00	MERRILL WILLIAM	1488 WESTBROOK DR	SARASOTA, FL 34231	ATTORNEY	CHE
2020	M3	03/13/2020	500.00	MIDCO PETROLEUM COMPANY	2212 6TH ST	SARASOTA, FL 34237	PETROLEUM COMPANY	CHE
2020	M3	03/17/2020	1,600.00	MATTAMY HOMES	19503 S WEST VILLAGES PKWY	VENICE, FL 34293	HOMEBUILDER	CHE
2020	M3	03/18/2020	1,000.00	JOHN CANNON HOMES, INC	6710 PROFESSIONAL PKWY W	SARASOTA, FL 34240	REAL ESTATE BROKER	CHE
2020	M3	03/26/2020	2,000.00	TRANS-UNITED DEVELOPMENT CORP	1651 WHITFIELD AVE UNIT 200	SARASOTA, FL 34243	FREIGHT MGMT	CHE
2020	M3	03/30/2020	5,000.00	XAPA, LLC	108 W 13TH ST	WILMINGTON, DE 19881	REAL ESTATE	CHE
2020	M3	03/31/2020	500.00	CORE CONSTRUCTION SERVICES OF	8027 COOPER CREEK BLVD STE 110	UNIVERSITY PARK, FL 34201	CONSTRUCTION	CHE
2020	M4	04/21/2020	2,500.00	QUEENSGATE HOMES INC	400-3000 STEELES AVE W	WOODBRIDGE, ONTARIO, XC 440	REAL ESTATE DEV	CHE
2020	M4	04/30/2020	1,000.00	GRANT MICHAEL	*****	*****	MEDICAL TRANSPORT	CHE
2020	P1	06/03/2020	19,000.00	BENDERSON DEVELOPMENT CO, LLC	570 DELAWARE AVE	BUFFALO, NY 14202	LAND DEVELOPMENT	CHE
2020	P1	06/03/2020	800.00	TAYLOR MORRISON INC BUILDING S	4900 N SCOTTSDALE RD STE 2000	SCOTTSDALE, AZ 85251	PAC	CHE
2020	P3	07/07/2020	20,000.00	SUN COAST PATRIOTS	115 E PARK AVE STE 1	TALLAHASSEE, FL 32301	PAC	CHE
2020	P4	07/14/2020	5,000.00	RAVE INVESTMENTS INC	301 BEACH RD UNIT 1	SARASOTA, FL 34242	REAL ESTATE	CHE
2020	P4	07/14/2020	11,400.00	SCHROEDER MANATEE RANCH, INC	14400 COVENANT WAY	LAKWOOD RANCH, FL 34202	LAND DEVELOPER	CHE
2020	P4	07/15/2020	7,000.00	BENDERSON DEVELOPMENT CO, LLC	570 DELAWARE AVE	BUFFALO, NY 14202	LAND DEVELOPMENT	CHE
			97,300.00					

18 Contribution(s) Selected

[Query the Campaign Finance Data Base](#)

[\(Department of State\)](#) [\(Division of Elections\)](#) [\(Candidates and Races\)](#) [\(Campaign Finance Information\)](#)





Florida Department of State
Division of Elections

Campaign Expenditures

Florida Country

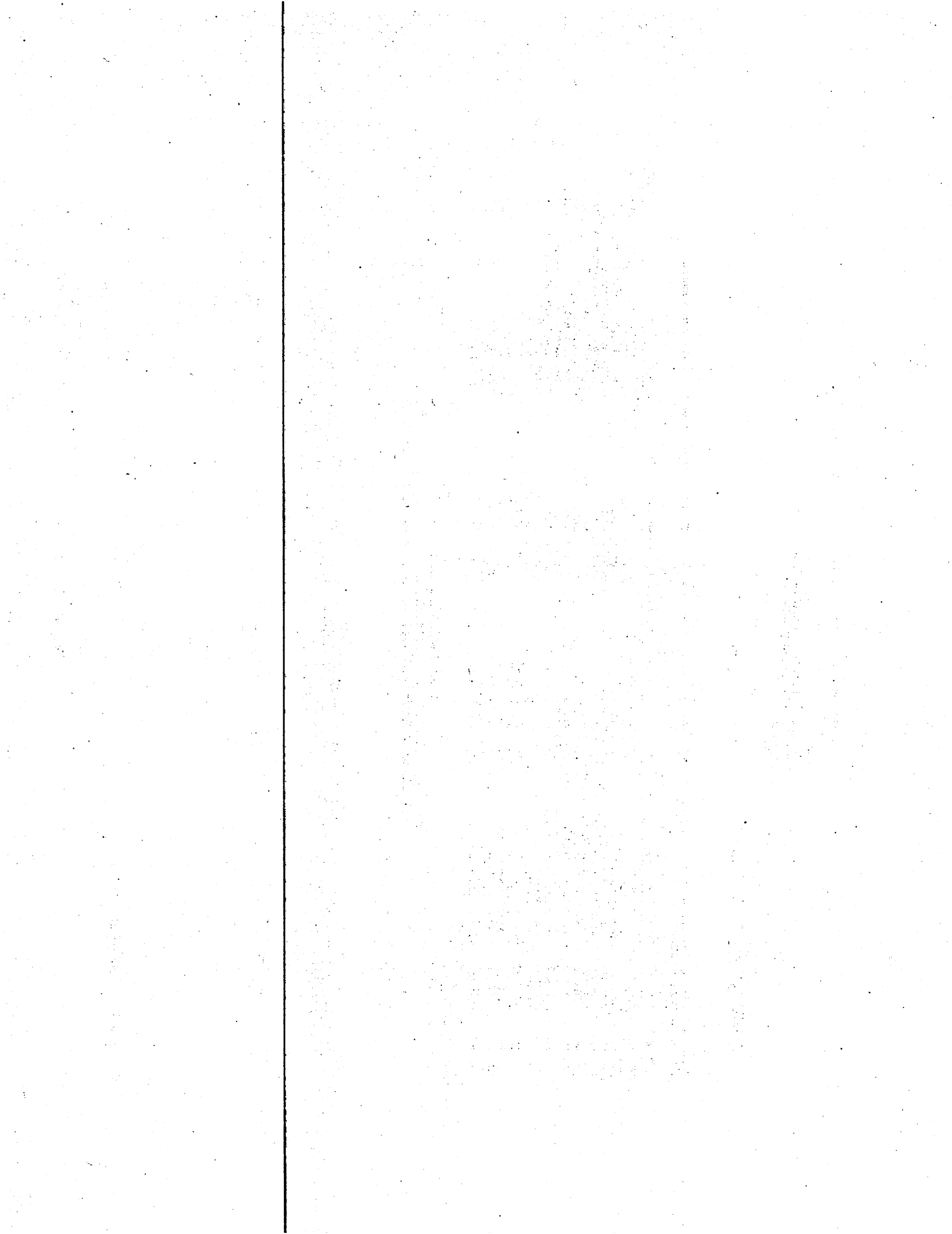
*This information is being provided as a convenience to the public, has been processed by the Division of Elections and should be cross referenced with the original report on file with the Division of Elections in case of questions.
About the Campaign Finance Data Base*

Rpt Yr	Rpt Type	Date	Amount	Expense Paid To	Address	City State Zip	Purpose	Typ Reimb
2020	M3	03/16/2020	75.00	WEBELECT	10150 HIGHLAND MANOR DR STE 20	TAMPA, FL 33610	FINANCE SOFTWARE	MON
2020	M3	03/18/2020	133.58	DELUXE	PO BOX 64468	SAINT PAUL, MN 55164	BANKING SUPPLIES	MON
2020	M3	03/19/2020	200.00	JIM BOYD CAMPAIGN	133 HARBOR DR S	VENICE, FL 34285	CONTRIBUTION FL STATE SENATOR DIST 21	CAN
2020	M3	03/19/2020	21.40	ROBINSON GRUTERS & ROBERTS PA	133 HARBOR DR S	VENICE, FL 34285	REIMB CAMPAIGN RELATED EXPENSES	RMB
2020	M3	03/19/2020	200.00	TOMMY GREGORY CAMPAIGN	133 HARBOR DR S	VENICE, FL 34285	CONTRIBUTION FL STATE REP DISTRICT 73	CAN
2020	M4	04/01/2020	350.00	ROBINSON GRUTERS & ROBERTS PA	133 HARBOR DR S	VENICE, FL 34285	ACCOUNTING SERVICES	MON
2020	M5	05/01/2020	350.00	ROBINSON GRUTERS & ROBERTS PA	133 HARBOR DR S	VENICE, FL 34285	ACCOUNTING SERVICES	MON
2020	P1	06/01/2020	350.00	ROBINSON GRUTERS & ROBERTS PA	133 HARBOR DR S	VENICE, FL 34285	ACCOUNTING SERVICES	MON
2020	P1	06/09/2020	200.00	NANCY DETERT CAMPAIGN	133 HARBOR DR S	VENICE, FL 34285	CONTRIB SARASOTA COUNTY COMMISSIONER	CAN
2020	P2A	06/30/2020	4,793.10	POLITICAL INK, INC	1200 18TH ST NW STE 700	WASHINGTON, DC 20036	DIRECT MAIL/POSTAGE/SHIPPING ADS	MON
2020	P2A	07/01/2020	500.00	ROBINSON GRUTERS & ROBERTS PA	133 HARBOR DR S	VENICE, FL 34285	ACCOUNTING SERVICE	MON
2020	P2A	07/02/2020	4,793.10	POLITICAL INK, INC	1200 18TH ST NW STE 700	WASHINGTON, DC 20036	MAILERS/POSTAGE/SHIPPING	MON
2020	P3	07/07/2020	4,849.96	POLITICAL INK, INC	1200 18TH ST NW STE 700	WASHINGTON, DC 20036	MAILERS/POSTAGE/SHIPPING	MON
2020	P4	07/13/2020	4,902.66	POLITICAL INK, INC	1200 18TH ST NW STE 700	WASHINGTON, DC 20036	MAILERS/POSTAGE	MON
2020	P4	07/13/2020	500.00	THE THOMPSON GROUP	639 OAKFORD RD	SARASOTA, FL 34240	SOCIAL MEDIA	MON
2020	P4	07/14/2020	78.75	SOLAZ CARSON	1201 A ENCORE WAY, FRUITVILLE	SARASOTA, FL 34236	CONTRACT SERVICE	MON
2020	P4	07/15/2020	52.50	BAUER GILLETTE	304 YACHT HARBOR DR	OSPREY, FL 34229	CONTRACT SERVICE	MON
2020	P4	07/16/2020	4,877.15	POLITICAL INK, INC	1200 18TH ST NW STE 700	WASHINGTON, DC 20036	MAILERS/POSTAGE/SHIP	MON
			27,228.00					

18 Expenditure(s) Selected

[Query the Campaign Finance Data Base](#)

[\(Department of State\)](#) [\(Division of Elections\)](#) [\(Candidates and Races\)](#) [\(Campaign Finance Information\)](#)



52 USC 30121: Contributions and donations by foreign nationals

Text contains those laws in effect on July 27, 2020

From Title 52-VOTING AND ELECTIONS

Subtitle III-Federal Campaign Finance

CHAPTER 301-FEDERAL ELECTION CAMPAIGNS

SUBCHAPTER I-DISCLOSURE OF FEDERAL CAMPAIGN FUNDS

Jump To:

[Source Credit](#)

[Codification](#)

[Prior Provisions](#)

[Amendments](#)

[Effective Date](#)

§30121. Contributions and donations by foreign nationals

(a) Prohibition

It shall be unlawful for-

(1) a foreign national, directly or indirectly, to make-

(A) a contribution or donation of money or other thing of value, or to make an express or implied promise to make a contribution or donation, in connection with a Federal, State, or local election;

(B) a contribution or donation to a committee of a political party; or

(C) an expenditure, independent expenditure, or disbursement for an electioneering communication (within the meaning of section 30104(f)(3) of this title); or

(2) a person to solicit, accept, or receive a contribution or donation described in subparagraph (A) or (B) of paragraph (1) from a foreign national.

(b) "Foreign national" defined

As used in this section, the term "foreign national" means-

(1) a foreign principal, as such term is defined by section 611(b) of title 22, except that the term "foreign national" shall not include any individual who is a citizen of the United States; or

(2) an individual who is not a citizen of the United States or a national of the United States (as defined in section 1101(a)(22) of title 8) and who is not lawfully admitted for permanent residence, as defined by section 1101(a)(20) of title 8.

(Pub. L. 92-225, title III, §319, formerly §324, as added Pub. L. 94-283, title I, §112(2), May 11, 1976, 90 Stat. 493 ; renumbered §319, Pub. L. 96-187, title I, §105(5), Jan. 8, 1980, 93 Stat. 1354 ; amended Pub. L. 107-155, title III, §§303, 317, Mar. 27, 2002, 116 Stat. 96 , 109.)

CODIFICATION

Section was formerly classified to section 441e of Title 2, The Congress, prior to editorial reclassification and renumbering as this section.

PRIOR PROVISIONS

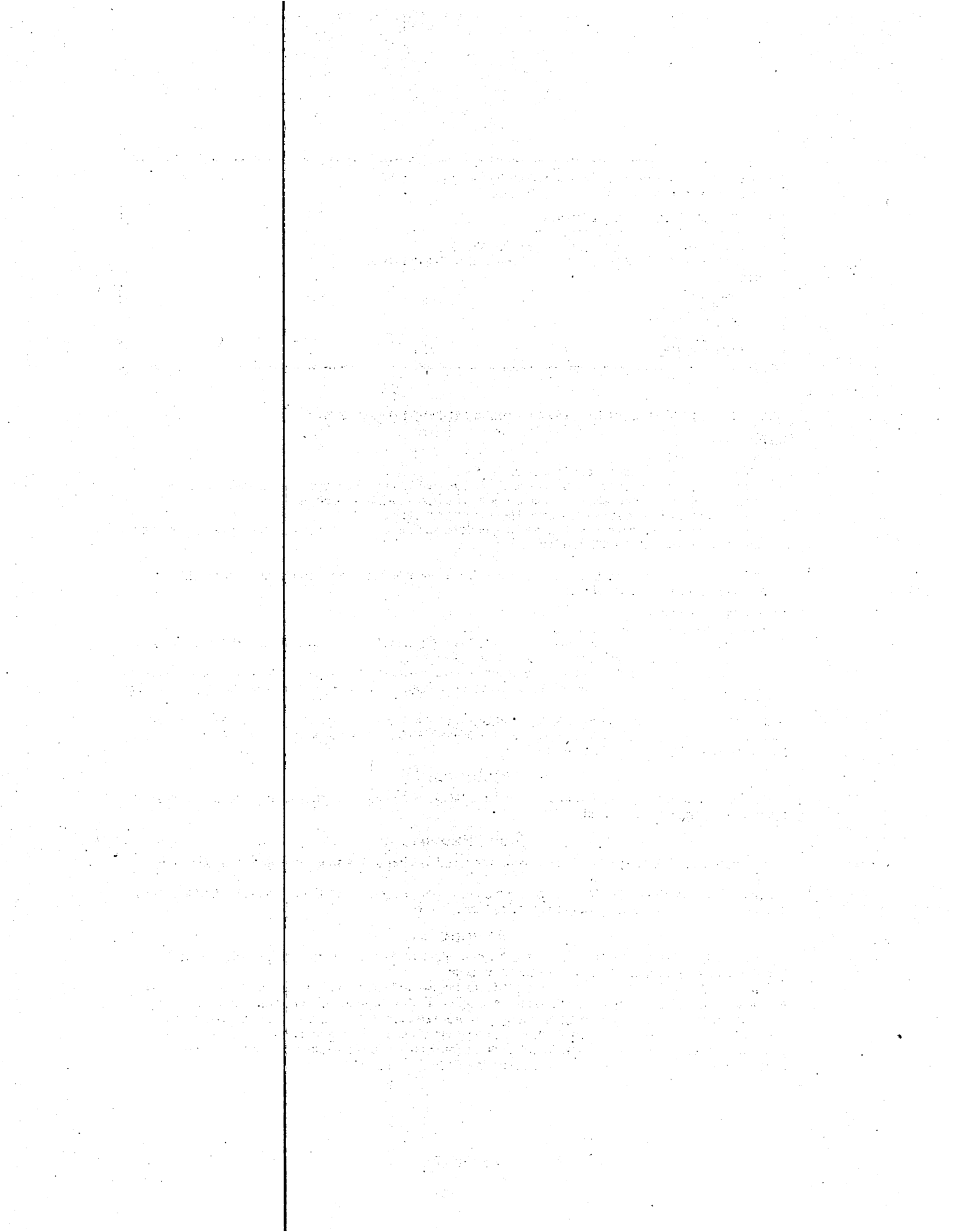
A prior section 319 of Pub. L. 92-225 was renumbered section 314, and is classified to section 30115 of this title.

Another prior section 319 of Pub. L. 92-225 was renumbered section 318, and was classified to section 439b of Title 2, The Congress, prior to repeal by Pub. L. 96-187.

AMENDMENTS

2002-Pub. L. 107-155, §303(1), substituted "Contributions and donations by foreign nationals" for "Contributions by foreign nationals" in section catchline.

Subsec. (a). Pub. L. 107-155, §303(2), added subsec. (a) and struck out former subsec. (a) which read as follows: "It shall be unlawful for a foreign national directly or through any other person to make any contribution of money or other thing of value, or to promise expressly or impliedly to make any such contribution, in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office; or for any person to solicit, accept, or receive any such contribution from a foreign national."



7/28/2020

Subsec. (b)(2). Pub. L. 107-155, §317, inserted "or a national of the United States (as defined in section 1101(a)(22) of title 8)" after "United States".

EFFECTIVE DATE OF 2002 AMENDMENT

Amendment by Pub. L. 107-155 effective Nov. 6, 2002, see section 402 of Pub. L. 107-155, set out as an Effective Date of 2002 Amendment; Regulations note under section 30101 of this title.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 31, 2020

VIA EMAIL

george.thurlow@outlook.com

George Thurlow
1302 52nd Street South
Gulfport, FL 33707

RE: MUR 7766

Dear Mr. Thurlow:

This letter acknowledges receipt of your complaint on July 28, 2020, alleging possible violations of the Federal Election Campaign Act of 1971, as amended. The respondents will be notified of this complaint within five business days.

You will be notified as soon as the Federal Election Commission (FEC) takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be notarized and sworn to in the same manner as the original complaint. We have numbered this matter MUR 7766. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Any correspondence sent to the Commission must be addressed to one of the following below. As indicated in the FEC's Notice found at https://www.fec.gov/resources/cms-content/documents/website_notice_regarding_status_of_FEC_operations_3-17-20.pdf, the office's mailroom is not processing correspondence at this time and, therefore, we strongly encourage you to file via email.

Mail
Federal Election Commission
Office of Complaints Examination
& Legal Administration
Attn: Christal Dennis, Paralegal
1050 First Street, NE
Washington, DC 20463

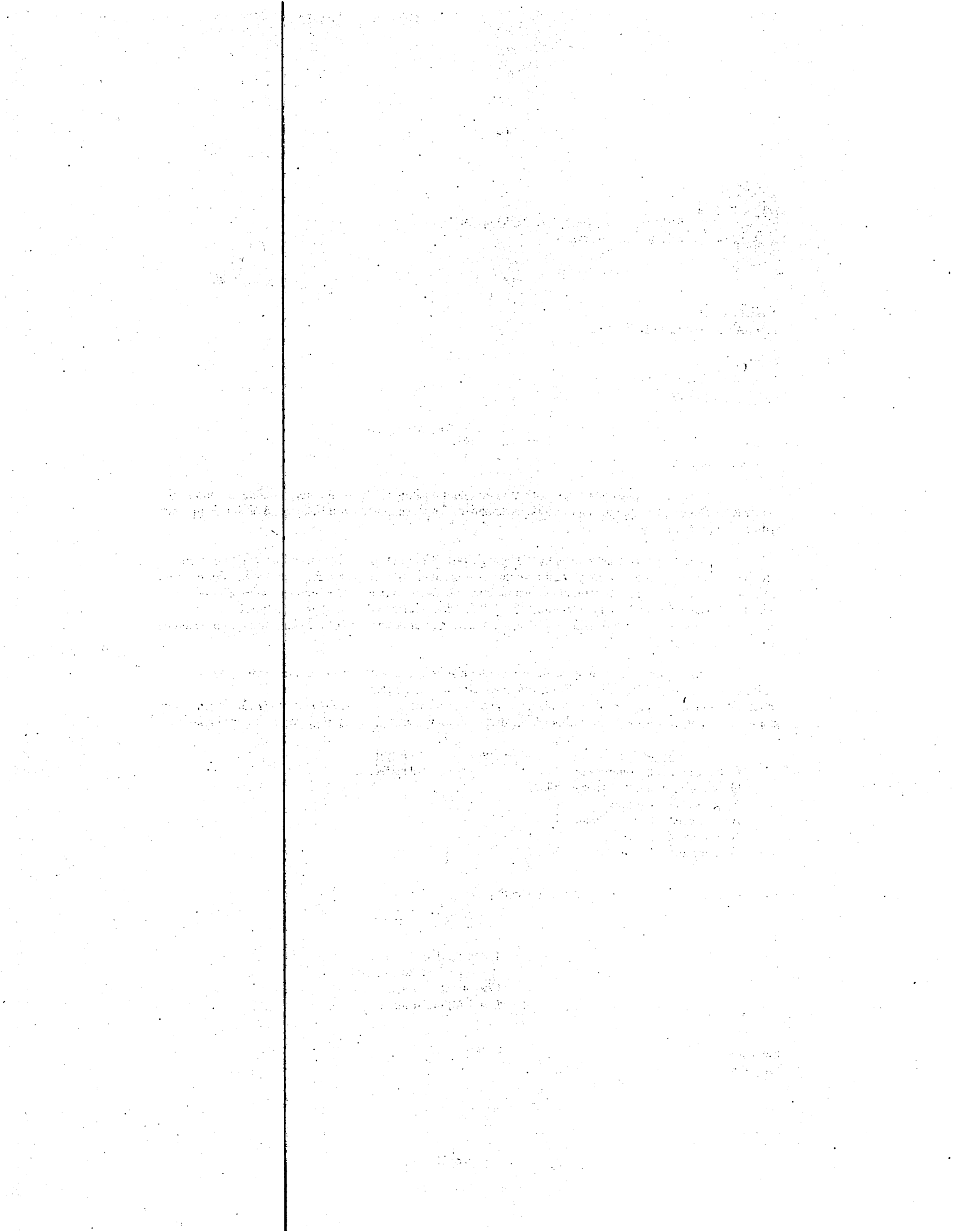
OR

Email
cela@fec.gov

Sincerely,

Jeff S. Jordan
Assistant General Counsel
Complaints Examination &
Legal Administration

Enclosure:
Procedures



George Thurlow
1302 52nd Street South
Gulfport, FL 33707
George.thurlow@outlook.com
Cell: (727)685-9719

August 14, 2020

Federal Election Commission
Office of Complaints Examination & Legal Administration
Attn: Christal Dennis, Paralegal
1050 First Street, NE
Washington, DC 20463

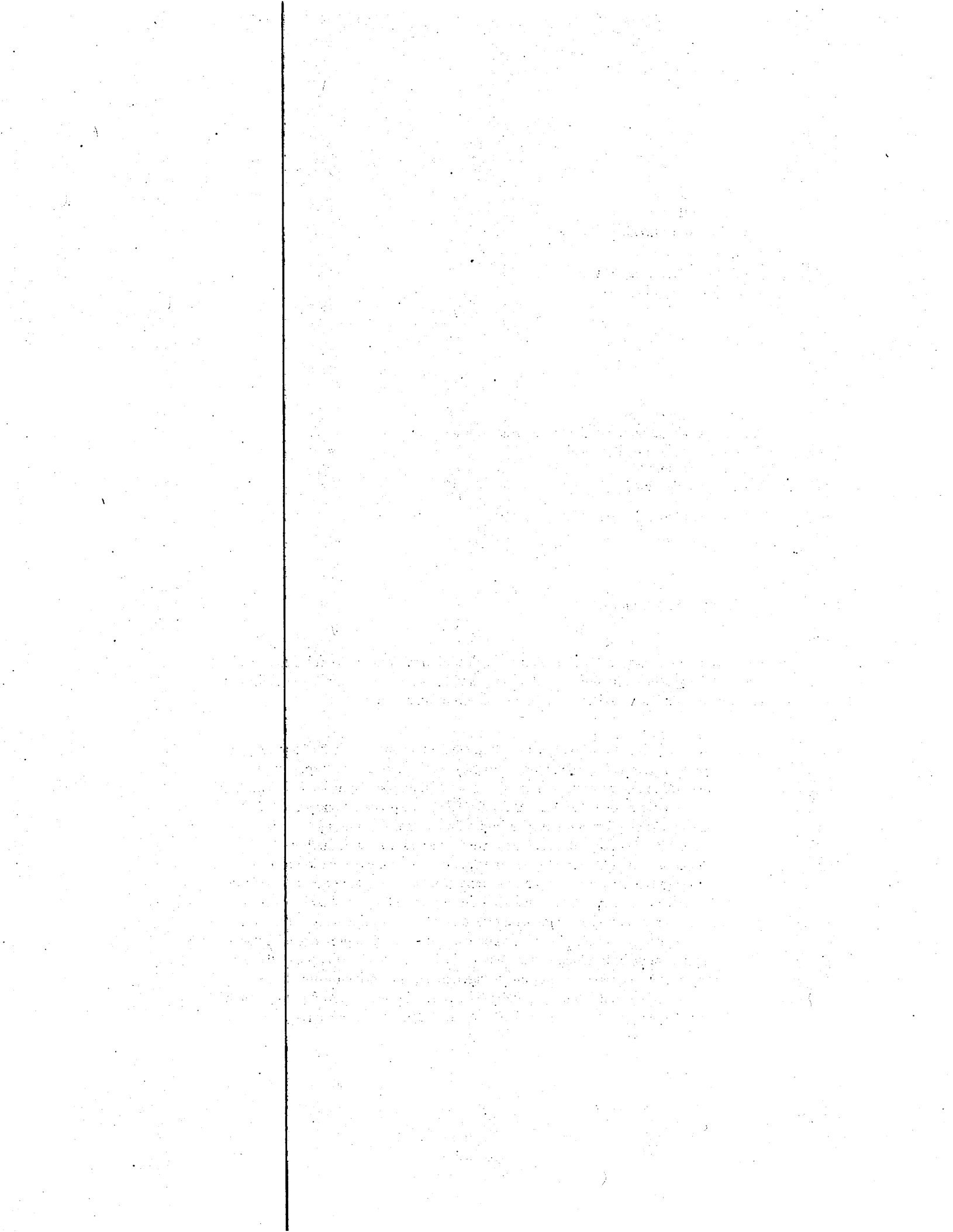
Sent via email to CELA@FEC.gov

RE: MUR 7766

To Whom It May Concern:

I am writing in regards to MUR 7766 filed against Florida Country, Wendi Leach, and Eric Robinson. Since initially filing the complaint, I have come to learn some additional information that I wish to share with the Federal Elections Commission.

- (1) At some point of time between my filing the complaint on July 27th and roughly 11am on August 10, 2020, Florida Country's campaign finance reports were amended to list the contribution being from "Queensgate Homes Inc—Vensota P" with an address of 11523 Palm Bush Trail #417, Lakewood Ranch, FL 34202 instead of being from Queensgate Homes Inc. with a Woodbridge, Ontario address. **This change of address does not address the fundamental allegation—that Queensgate Homes Inc. is a foreign corporation (thus being a foreign citizen), and thus cannot donate in federal, state or local elections.** American jurisprudence typically is of the understanding that a corporation is either a citizen of where it is incorporated or where it's principal place of business is. Queensgate Homes Inc. is incorporated in the Canadian province of Ontario and maintains its headquarters in Woodbridge, Ontario. Under either of these standards, Queensgate Homes Inc. is based in Ontario. Additionally, the new address on the contribution is not that of a Queensbridge Homes Inc. office in the United States, but rather a rented mailbox at a UPS Store in a single-level



shopping center. This mailbox seems to be used by Fausto Palombo, the owner and CEO of Queensgate, for other business he owns that are incorporated in Florida. One of those business is named Vensota Properties Inc.. On August 10, 2020, the *Sarasota Herald Tribune* incorrectly published a story citing that the revised report names Vensota Properties as the contributor, which would be legal under the theory I alleged in my initial complaint. However, it should be noted that this contribution does not appear to have come from Vensota Properties Inc., a Florida corporation, but rather from Queensgate Homes Inc., a Canadian corporation. There is no legal connection between Queensgate Homes Inc. and Vensota Properties Inc. Additionally, media coverage of Queensgate Homes Inc. and Mr. Palombo over the years have identified both as Canadian.^{1 2} Specifically, the *Sarasota Herald-Tribune* reported the following on Mr. Palombo's citizenship—"Born in Italy, Palombo immigrated to Canada at age 7 in the late 1950s and eventually built homes in the Toronto area."³

- (2) Based on the amendment of Florida Country's reports after a complaint was filed with the Florida Division of Elections in a way that would deter suspicion of wrongdoing, I am alleging a probable violation of 18 U.S.C. § 1505 by Ms. Leach and Mr. Robinson. 18 U.S.C. § 1505 states "Whoever, with intent to avoid, evade, prevent, or obstruct compliance, in whole or in part, with any civil investigative demand duly and properly . . . shall be fined under this title, imprisoned not more than 5 years or, if the offense involves international or domestic terrorism (as defined in section 2331), imprisoned not more than 8 years, or both." By amending the report to reflect an entity and address other than that initially reported, the investigation into these allegations seems to be obstructed. I am awaiting a public records request from the Florida Department of State to see the exact date this report was amended.

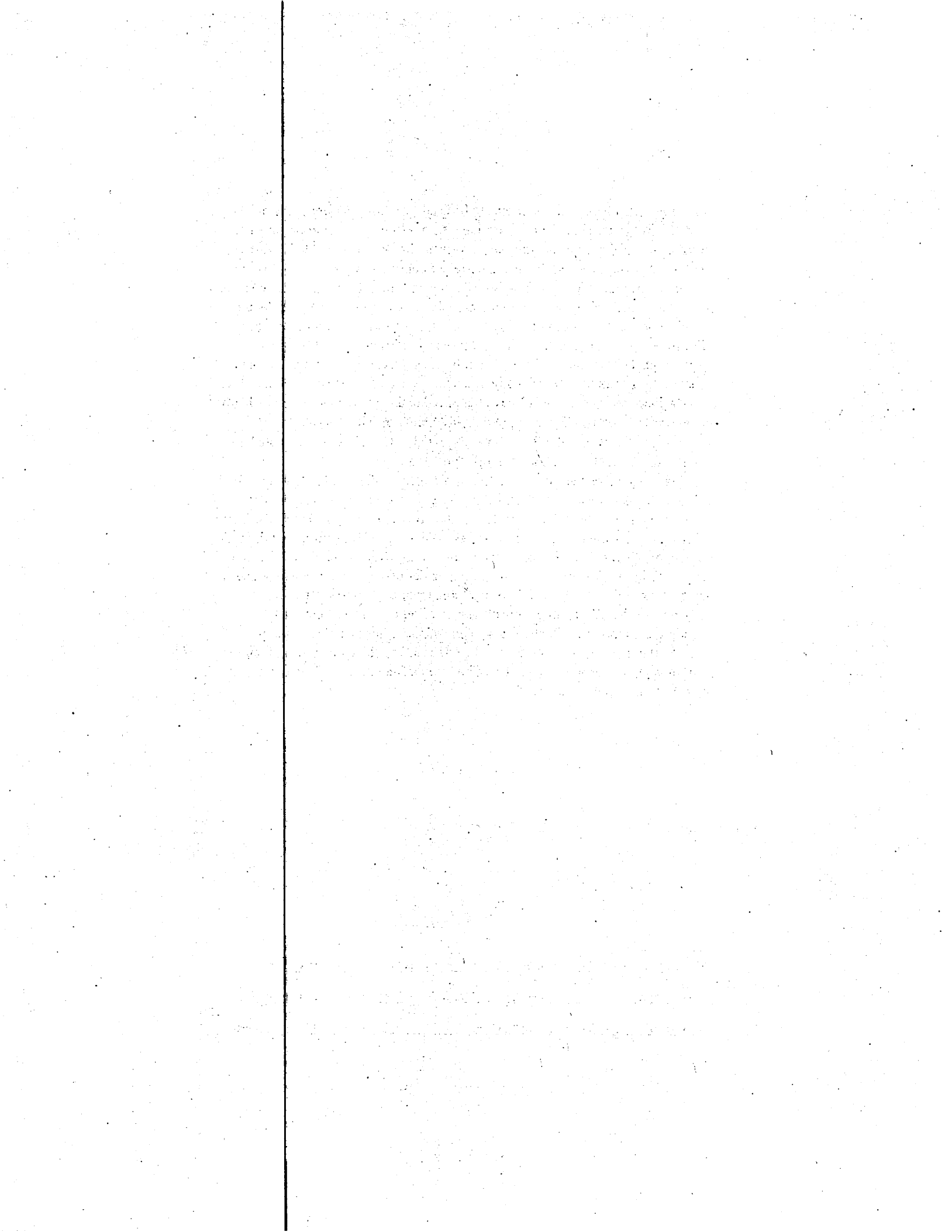
Sincerely,

George Thurlow

¹ <http://insidereaalestate.heraldtribune.com/2011/05/25/bullish-canadian-investor-keeps-buying-sarasota-real-estate/>

² <http://gm5-lkweb.newscyclecloud.com/news/20150426/developer-finds-success-despite-bumps-in-the-road>

³ <http://gm5-lkweb.newscyclecloud.com/news/20131126/theater-company-sells-1-million-in-property>



OATH

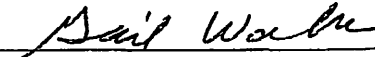
STATE OF **FLORIDA**
COUNTY OF **PINELLAS**

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

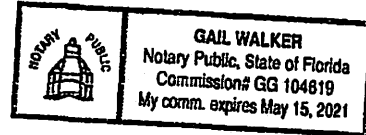


Original Signature of Person Bringing Complaint

Sworn to and subscribed before me this 14 day of August, 2020


Signature of Officer Authorized to Administer Oaths or Notary Public

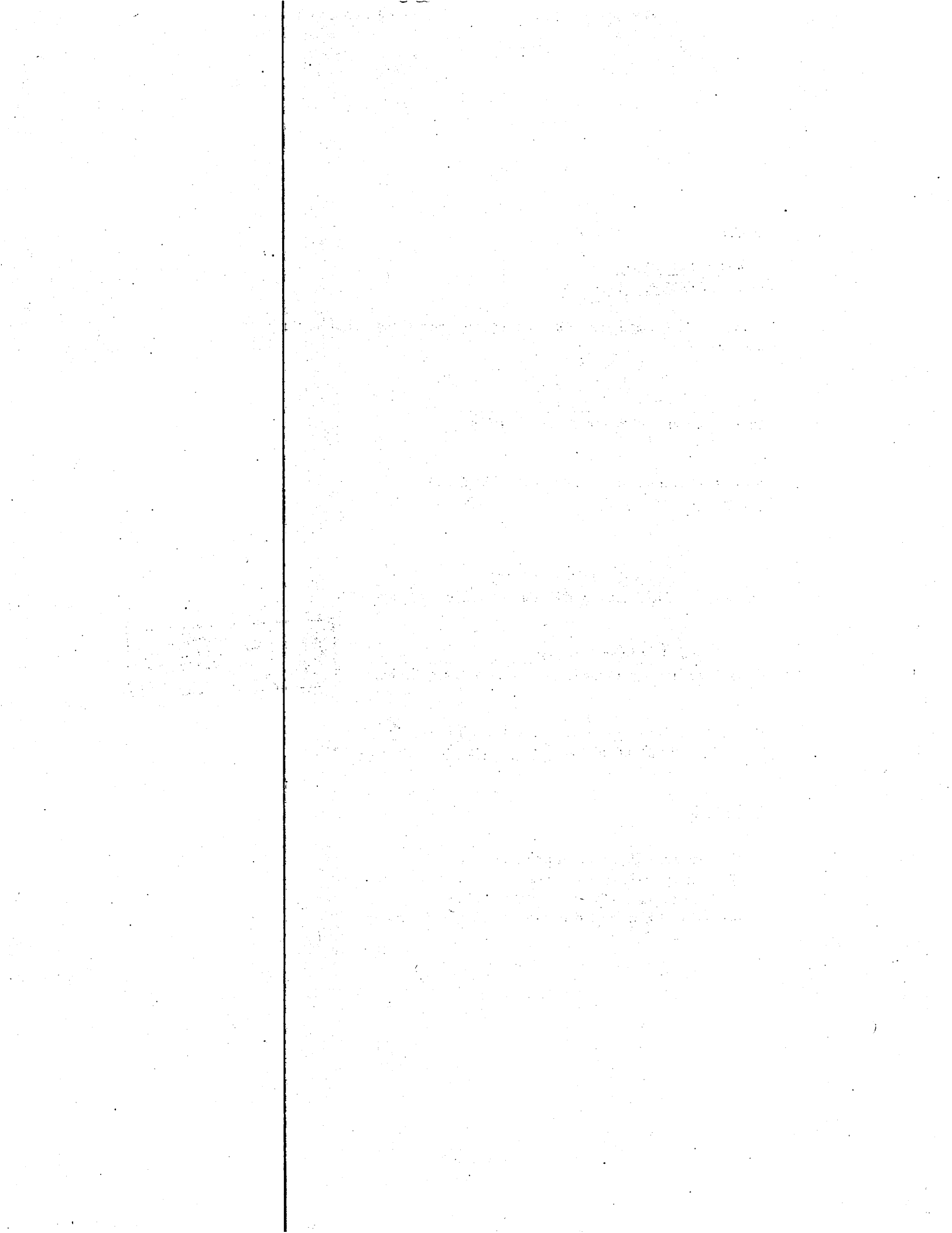
Gail Walker
(Print, Type, or Stamp Commissioned Name of Notary Public)



Personally Known _____ Or Produced Identification X
Type of Identification Produced Florida Driver License

EXHIBITS:

- (1) Queensgate Homes Inc. Corporate Profile
- (2) Queensgate Homes Inc. website
- (3) The UPS Store info—11523 Palm Bush Trail
- (4) Report of Florida Country's Contributions as of August 11, 2020



Request ID: 024869212
 Transaction ID: 76230559
 Category ID: (C)CC/E

Province of Ontario
 Ministry of Government Services

Date Report Produced: 2020/08/12
 Time Report Produced: 08:01:47
 Page: 1

Certified a true copy of the data as recorded on the Ontario Business Information System.

Barbara Ashitt
 Director
 Ministry of Government Services
 Toronto, Ontario

CORPORATION PROFILE REPORT

Ontario Corp Number	Corporation Name	Incorporation Date
1209314	QUEENSGATE HOMES INC.	1996/11/19
		Jurisdiction
		ONTARIO
Corporation Type	Corporation Status	Former Jurisdiction
ONTARIO BUSINESS CORP.	ACTIVE	NOT APPLICABLE
Registered Office Address		Date Amalgamated
3800 STEELES AVE WEST		NOT APPLICABLE
Suite # SUITE 400		New Amal. Number
WOODBIDGE		NOT APPLICABLE
ONTARIO		Notice Date
CANADA L4L 4G9		NOT APPLICABLE
Mailing Address		Letter Date
3800 STEELES AVE WEST		NOT APPLICABLE
Suite # 400		Revival Date
WOODBIDGE		NOT APPLICABLE
ONTARIO		Continuation Date
CANADA L4L 4G9		NOT APPLICABLE
		Transferred Out Date
		NOT APPLICABLE
		Cancel/Inactive Date
		NOT APPLICABLE
		EP Licence Eff.Date
		NOT APPLICABLE
		EP Licence Term.Date
		NOT APPLICABLE
		Date Commenced in Ontario
		NOT APPLICABLE
		Date Ceased in Ontario
		NOT APPLICABLE
Activity Classification	Number of Directors	
NOT AVAILABLE	Minimum Maximum	
	00001 00010	

Request ID: 024869212
Transaction ID: 76230559
Category ID: (C)CC/E

Province of Ontario
Ministry of Government Services

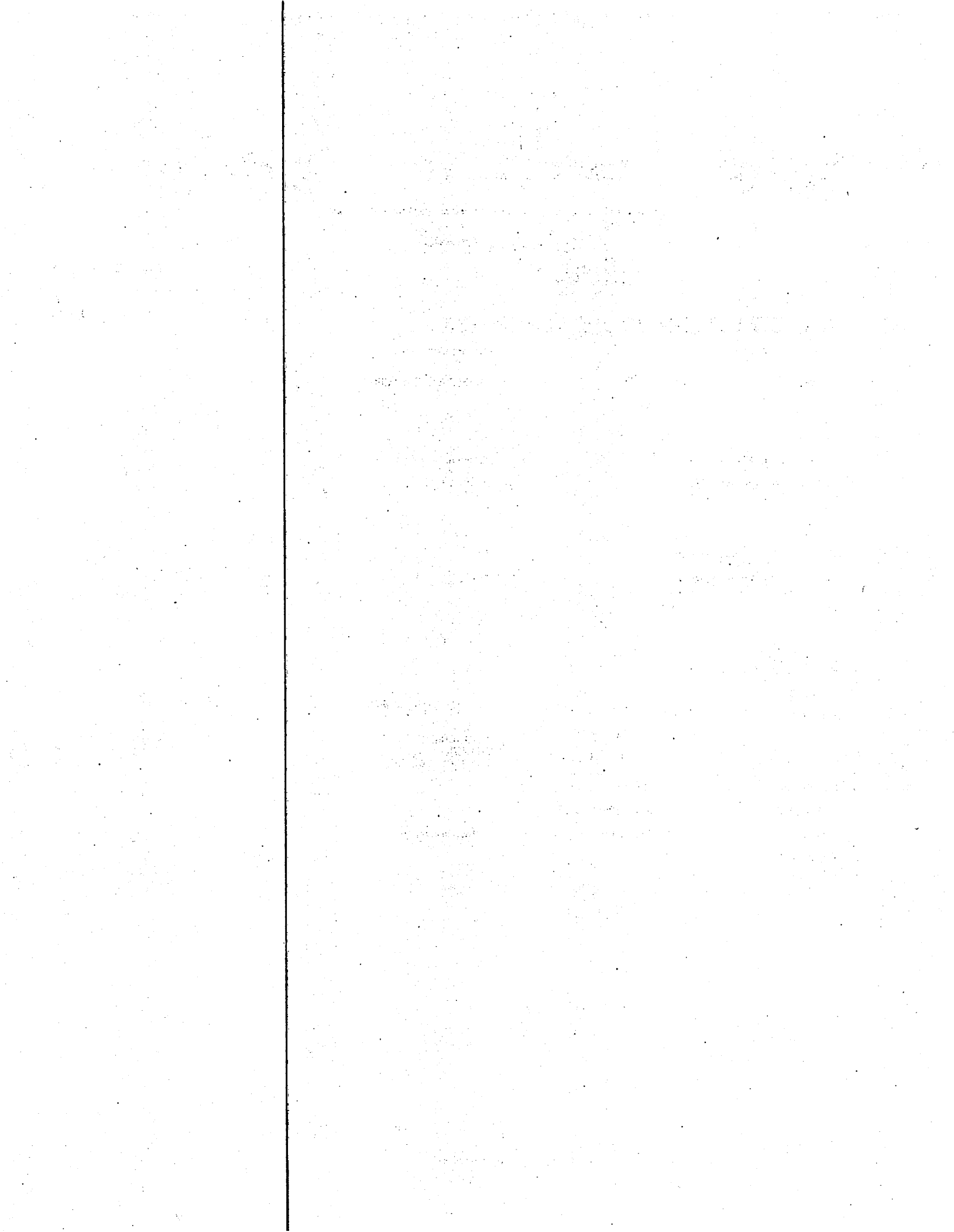
Date Report Produced: 2020/08/12
Time Report Produced: 08:01:47
Page: 2

Certified a true copy of the data as recorded on the Ontario Business Information System.


Director
Ministry of Government Services
Toronto, Ontario

CORPORATION PROFILE REPORT

Ontario Corp Number	Corporation Name	
1209314	QUEENSGATE HOMES INC.	
Corporate Name History	Effective Date	
QUEENSGATE HOMES INC.	1996/11/19	
Current Business Name(s) Exist:	NO	
Expired Business Name(s) Exist:	NO	
Administrator: Name (Individual / Corporation)	Address	
FAUSTO PALOMBO	105 ROSSMULL CRESCENT WOODBIDGE ONTARIO CANADA L4L 7E2	
Date Began	First Director	
1998/01/01	NOT APPLICABLE	
Designation	Officer Type	Resident Canadian
DIRECTOR		Y



Request ID: 024869212
Transaction ID: 76230559
Category ID: (C)CC/E

Province of Ontario
Ministry of Government Services

Date Report Produced: 2020/08/12
Time Report Produced: 08:01:47
Page: 3

Certified a true copy of the data as recorded on the Ontario Business Information System.

Barbara Archibutt
Director
Ministry of Government Services
Toronto, Ontario

CORPORATION PROFILE REPORT

Ontario Corp Number

1209314

Corporation Name

QUEENSGATE HOMES INC.

Administrator:
Name (Individual / Corporation)

FAUSTO
PALOMBO

Address

105 ROSSMULL CRESCENT

WOODBIDGE
ONTARIO
CANADA L4L 7E2

Date Began

1998/01/01

First Director

NOT APPLICABLE

Designation

OFFICER

Officer Type

PRESIDENT

Resident Canadian

Y

Administrator:
Name (Individual / Corporation)

FAUSTO
PALOMBO

Address

105 ROSSMULL CRESCENT

WOODBIDGE
ONTARIO
CANADA L4L 7E2

Date Began

1998/01/01

First Director

NOT APPLICABLE

Designation

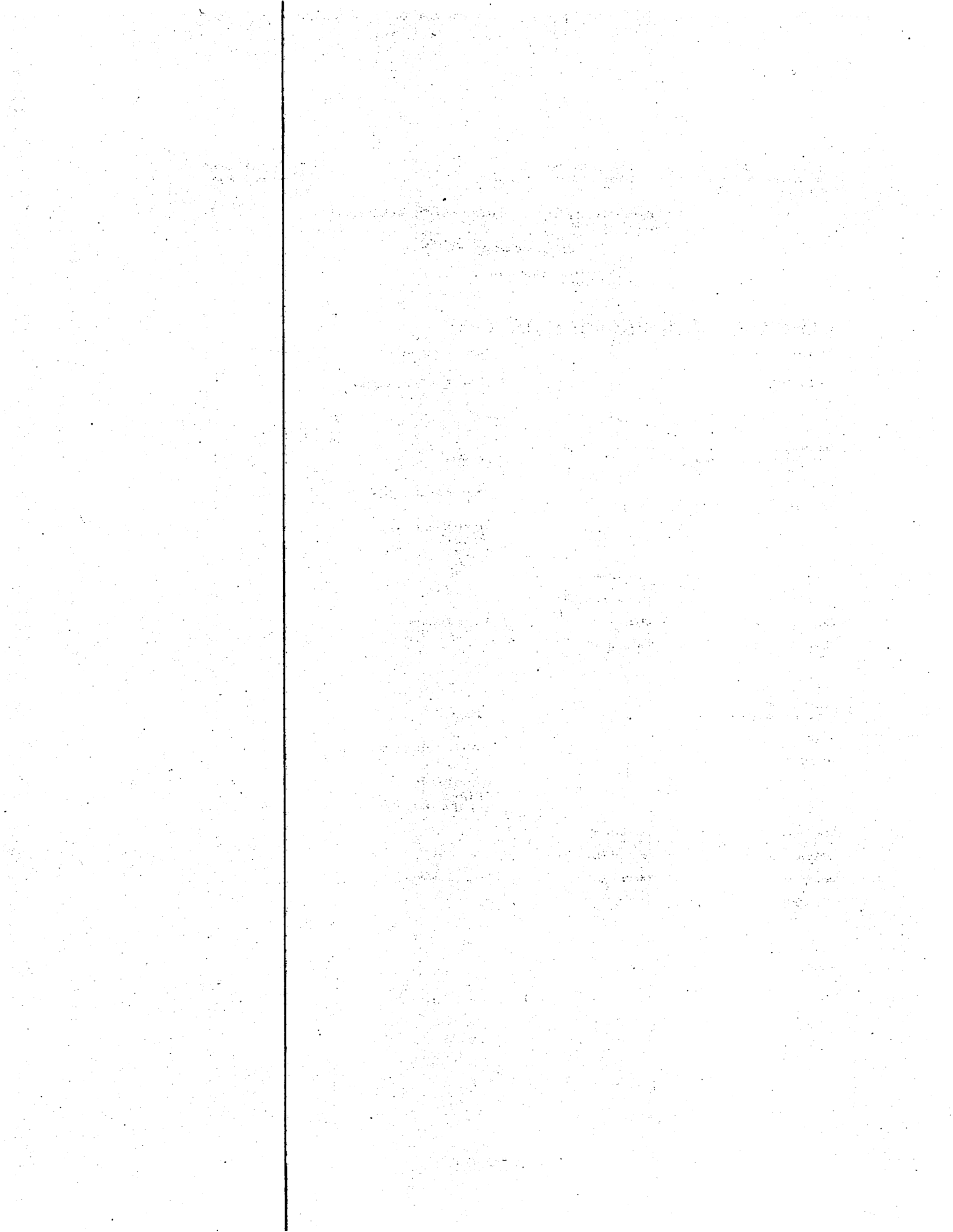
OFFICER

Officer Type

SECRETARY

Resident Canadian

Y



Request ID: 024869212
Transaction ID: 76230559
Category ID: (C)CC/E

Province of Ontario
Ministry of Government Services

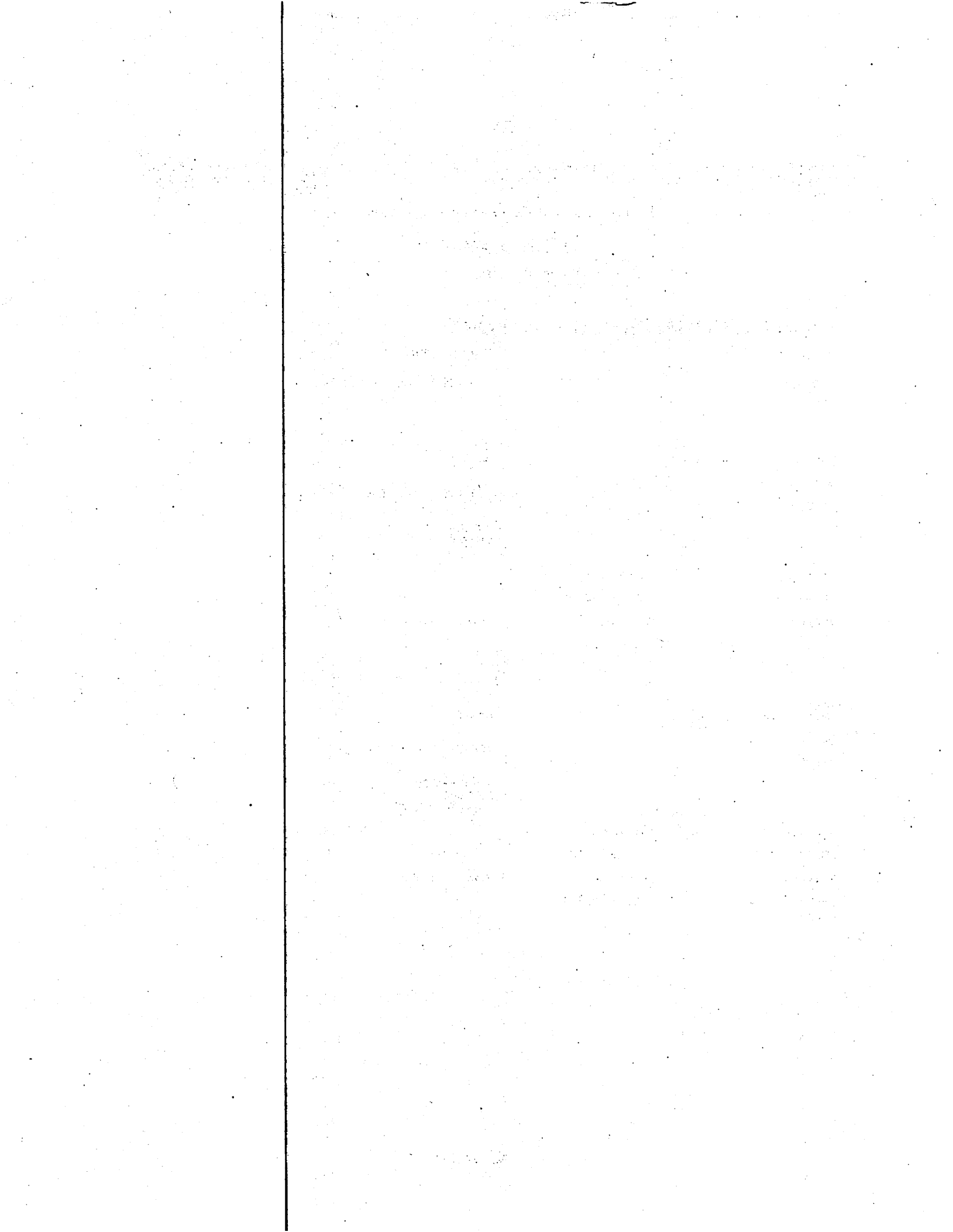
Date Report Produced: 2020/08/12
Time Report Produced: 08:01:47
Page: 4

Certified a true copy of the data as recorded on the Ontario Business Information System.


Director
Ministry of Government Services
Toronto, Ontario

CORPORATION PROFILE REPORT

Ontario Corp Number	Corporation Name	
1209314	QUEENSGATE HOMES INC.	
Administrator: Name (Individual / Corporation)	Address	
SILVANA PALOMBO	105 ROSSMULL CRESCENT WOODBIDGE ONTARIO CANADA L4L 7E2	
Date Began	First Director	
2008/08/21	NOT APPLICABLE	
Designation	Officer Type	Resident Canadian
OFFICER	TREASURER	
Administrator: Name (Individual / Corporation)	Address	
SILVANA PALOMBO	105 ROSSMULL CRESCENT WOODBIDGE ONTARIO CANADA L4L 7E2	
Date Began	First Director	
2008/08/21	NOT APPLICABLE	
Designation	Officer Type	Resident Canadian
OFFICER	VICE-PRESIDENT	



Request ID: 024869212
Transaction ID: 78230559
Category ID: (C)CC/E

Province of Ontario
Ministry of Government Services

Date Report Produced: 2020/08/12
Time Report Produced: 08:01:47
Page: 5

Certified a true copy of the data as recorded on the Ontario Business Information System.


Director
Ministry of Government Services
Toronto, Ontario

CORPORATION PROFILE REPORT

Ontario Corp Number

Corporation Name

1209314

QUEENSGATE HOMES INC.

Last Document Recorded

Act/Code Description

Form

Date

CIA ANNUAL RETURN 2019

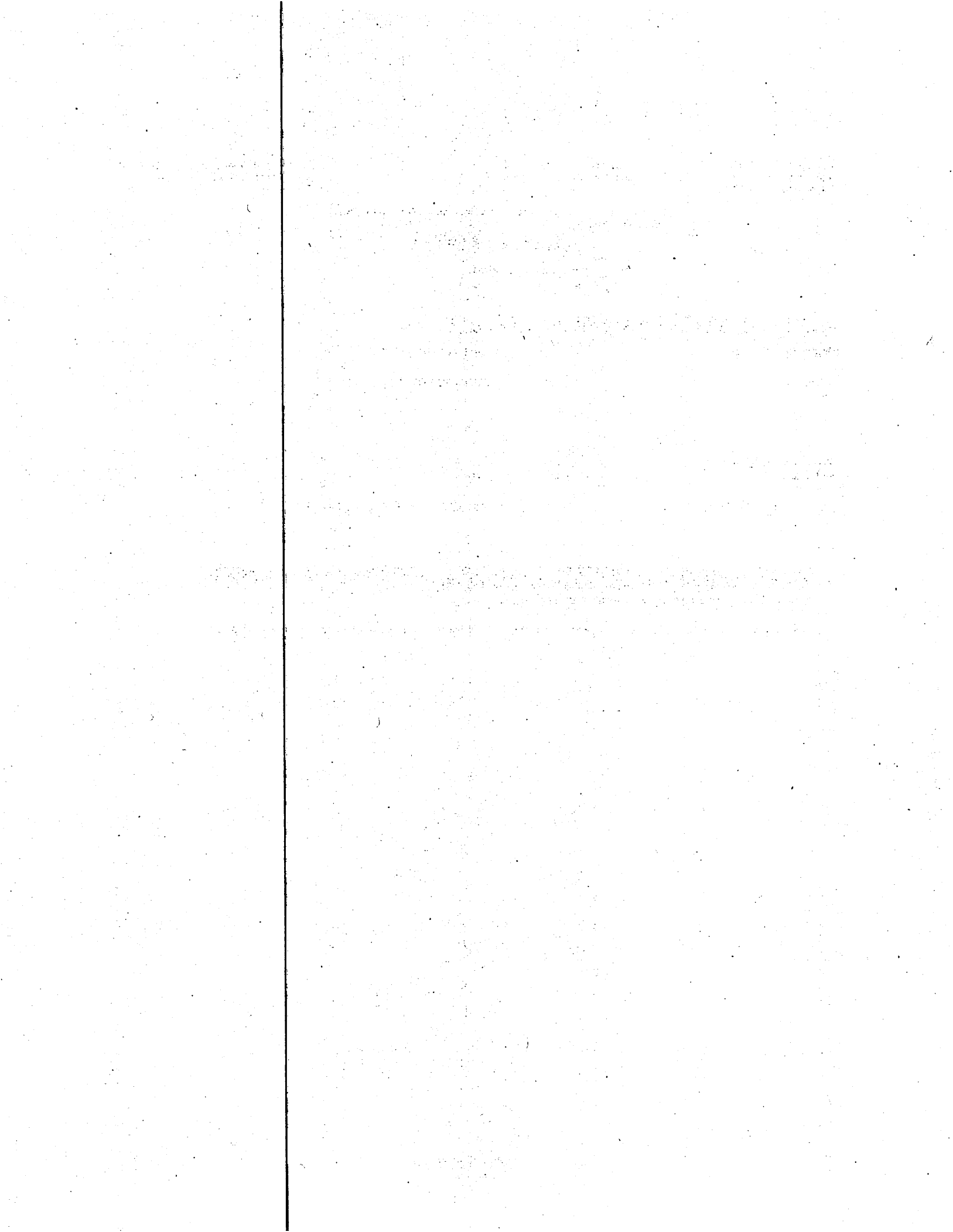
1C

2019/12/01 (ELECTRONIC FILING)

THIS REPORT SETS OUT THE MOST RECENT INFORMATION FILED BY THE CORPORATION ON OR AFTER JUNE 27, 1992, AND RECORDED IN THE ONTARIO BUSINESS INFORMATION SYSTEM AS AT THE DATE AND TIME OF PRINTING. ALL PERSONS WHO ARE RECORDED AS CURRENT DIRECTORS OR OFFICERS ARE INCLUDED IN THE LIST OF ADMINISTRATORS.

ADDITIONAL HISTORICAL INFORMATION MAY EXIST ON MICROFICHE.

The issuance of this certified report in electronic form is authorized by the Director of Companies and Personal Property Security Branch.



QUEENSGATE

HOME COMMUNITIES BUILDER GALLERY CONTACT AWARDS/TESTIMONIALS

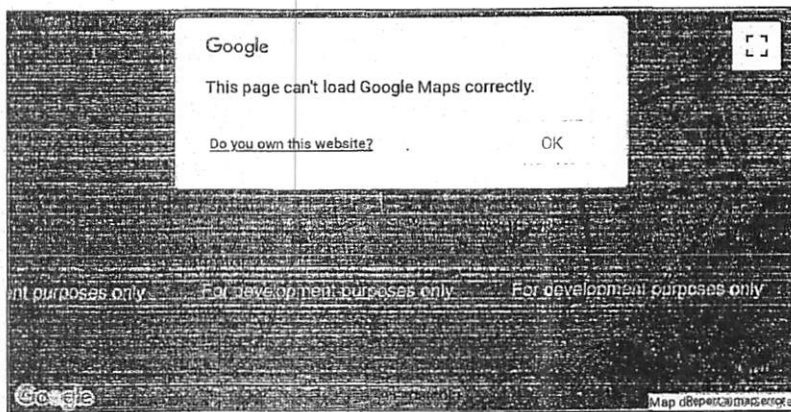


Get in touch. Find your new home.

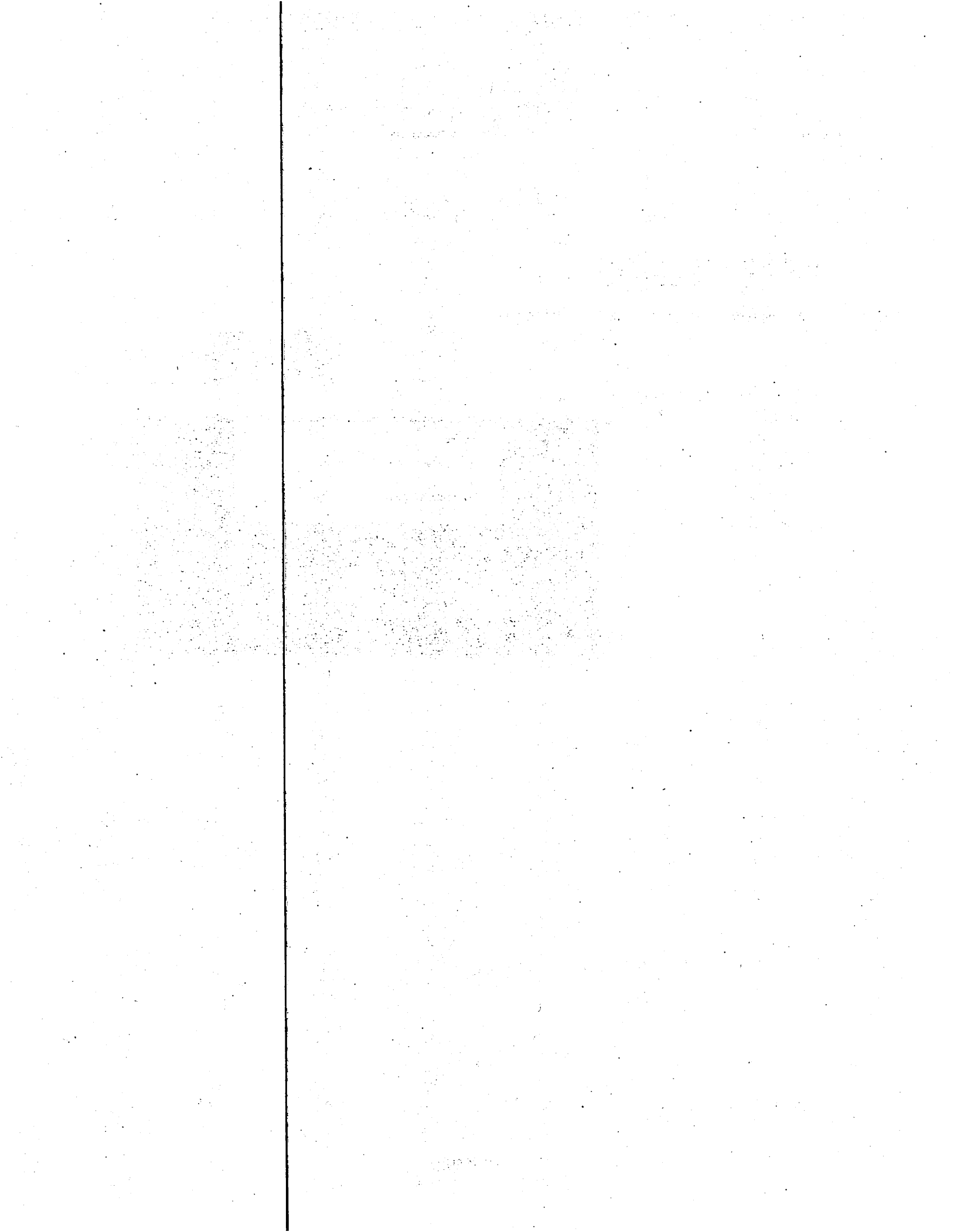
HEAD OFFICE

3800 Steeles Avenue West
West Building, Suite 400
Woodbridge, Ontario L4L4G9
Tel: (905) 264-0600
Fax: (905) 264-0662

info@queensgatehomes.com



Copyright Queensgate Homes



8/12/2020

The UPS Store Bradenton: Shipping & Packing, Printing and Mailboxes at 11523 Palmbrush Trail, in Bradenton, FL



Spread the Word with Flyers

Get the word out that you're back in business with full-color double-sided flyers from The UPS Store.

We're Open to Help You Reopen

We are ready to help your small business any way we can. Whether it's printed signs, menus or direct mail solution, a mailbox for package receiving or specialized shipping we've got you covered.

 [Get Directions](#)

WE'RE OPEN – The UPS Store is designated as essential and remains open.

Palmbrush Trail

CLOSED NOW, OPEN TODAY AT 8:00 AM

[Call Us](#)

[Directions](#)

[Get a Ride](#)

The UPS Store #5184

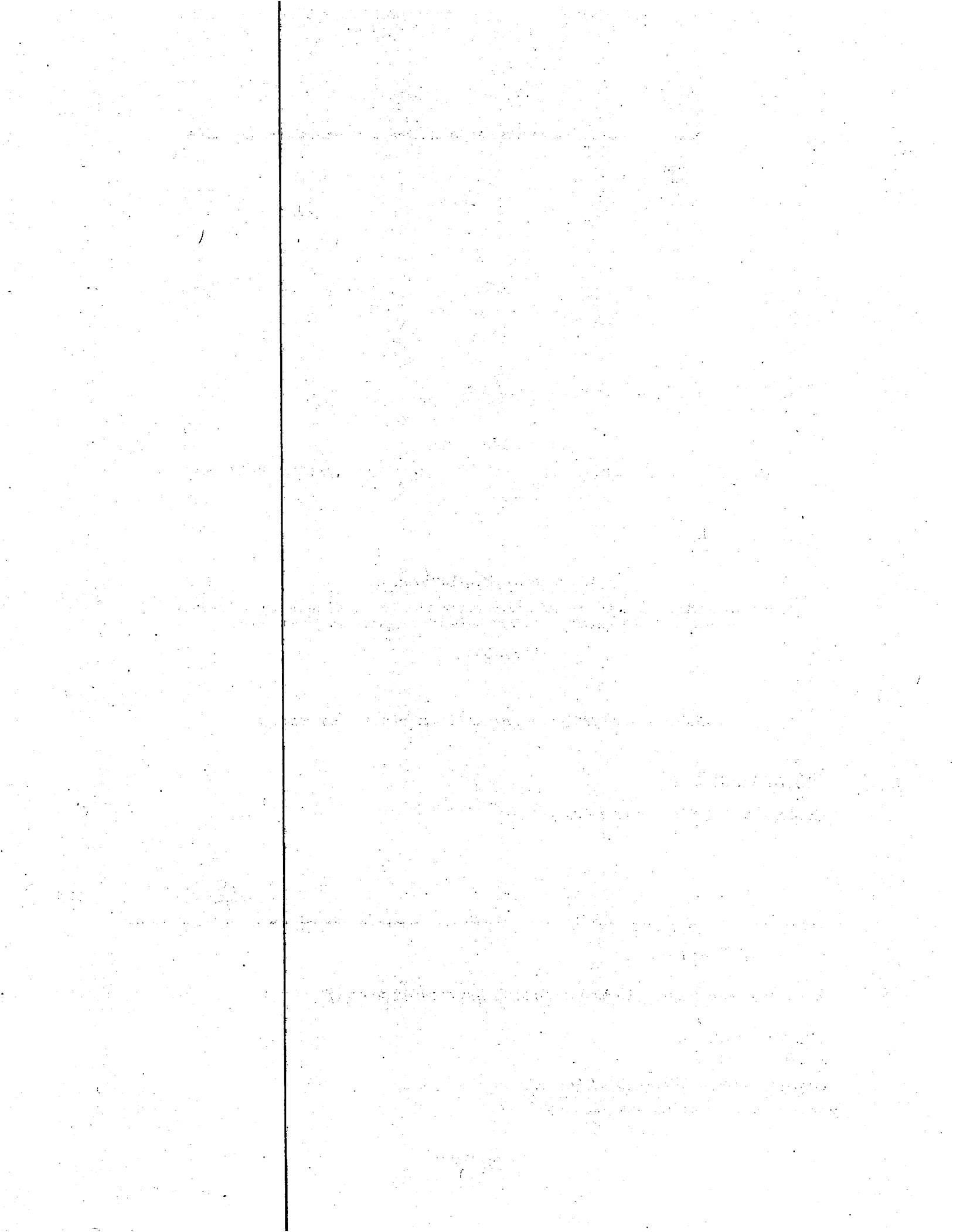
Your resource for mailbox, shipping, and printing services in Bradenton, FL.

11523 Palmbrush Trail
Bradenton, FL 34202

Corner Of Lakewood Ranch Blvd & Route 70

<https://locations.theupsstore.com/fl/bradenton/11523-palmbrush-trail>

1/12



[Estimate Shipping Cost](#)

[Contact Us](#)

Phone:

[\(941\) 751-6245](tel:(941)751-6245)

Fax:

(941) 753-6862

Email:

store5184@theupsstore.com

Hours

Store Hours

Closed Now, Open Today at 8:00 AM ↕

UPS Air Pickup Times

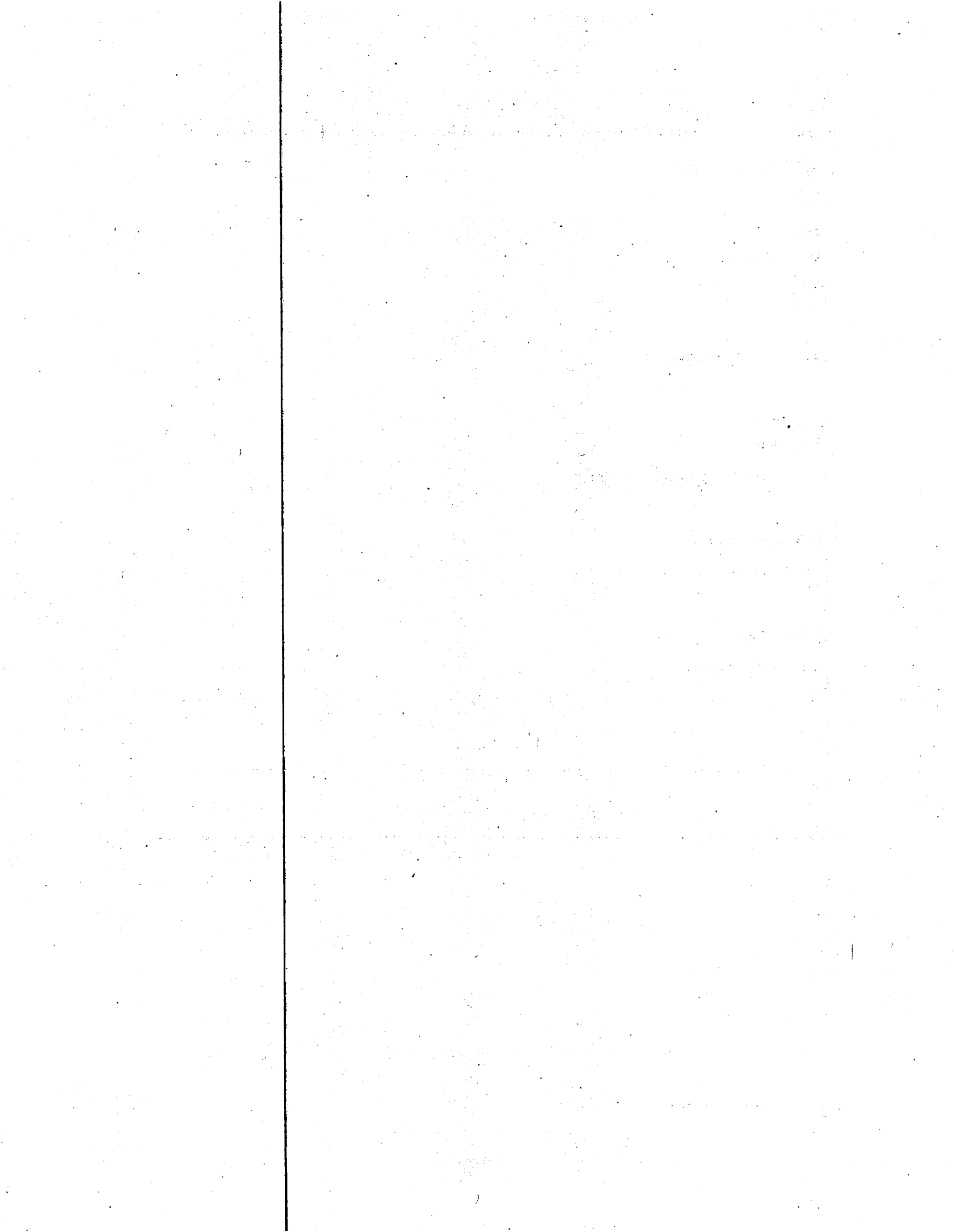
Last Pickup Today at 5:00 PM ↕

UPS Ground Pickup Times

Last Pickup Today at 5:00 PM ↕

[Start Print Order](#)

[Schedule Appointment](#)





Florida Department of State
Division of Elections

Campaign Contributions

Florida Country

[About the Campaign Finance Data Base](#)

Rpt Yr	Rpt Type	Date	Amount	Contributor Name	Address	City State Zip	Occupation	Typ InKind Desc
2020	M3	03/04/2020	5,000.00	GABBERT INVESTMENT GROUP LLC	1250 HIDDEN HARBOR WAY	SARASOTA, FL 34242	FINANCE SERVICES	CHE
2020	M3	03/06/2020	5,000.00	MEDRED ROBERT	5972 RIVER FOREST CIR	BRADENTON, FL 34203	REAL ESTATE	CHE
2020	M3	03/10/2020	5,000.00	SABA WILLIAM	240 S PINEAPPLE AVE STE 702	SARASOTA, FL 34236	ATTORNEY	CHE
2020	M3	03/13/2020	5,000.00	MERRILL WILLIAM	1408 WESTBROOK DR	SARASOTA, FL 34231	ATTORNEY	CHE
2020	M3	03/13/2020	500.00	MIDCO PETROLEUM COMPANY	2212 6TH ST	SARASOTA, FL 34237	PETROLEUM COMPANY	CHE
2020	M3	03/17/2020	1,600.00	MATTAMY HOMES	19503 S WEST VILLAGES PKWY	VENICE, FL 34293	HOMEBUILDER	CHE
2020	M3	03/18/2020	1,000.00	JOHN CANNON HOMES, INC	6710 PROFESSIONAL PKWY W	SARASOTA, FL 34240	REAL ESTATE BROKER	CHE
2020	M3	03/26/2020	2,000.00	TRANS-UNITED DEVELOPMENT CORP	1651 WHITFIELD AVE UNIT 200	SARASOTA, FL 34243	FREIGHT MGMT	CHE
2020	M3	03/30/2020	5,000.00	XAPA, LLC	108 W 13TH ST	HILKINGTON, DE 19801	REAL ESTATE	CHE
2020	M3	03/31/2020	500.00	CORE CONSTRUCTION SERVICES OF	8027 COOPER CREEK BLVD STE 110	UNIVERSITY PARK, FL 34201	CONSTRUCTION	CHE
2020	M4	04/21/2020	2,500.00	QUEENSGATE HOMES INC-VENSOTA P	11523 PALM BRUSH TRAIL, #417	LAKEMOOD RANCH, FL 34202	REAL ESTATE DEV	CHE
2020	M4	04/30/2020	1,000.00	GRANT MICHAEL	*****	*****	MEDICAL TRANSPORT	CHE
2020	P1	06/03/2020	19,000.00	BENDERSON DEVELOPMENT CO, LLC	570 DELAWARE AVE	BUFFALO, NY 14202	LAND DEVELOPMENT	CHE
2020	P1	06/03/2020	800.00	TAYLOR MORRISON INC BUILDING S	4900 N SCOTTSDALE RD STE 2000	SCOTTSDALE, AZ 85251	PAC	CHE
2020	P3	07/07/2020	20,000.00	SUN COAST PATRIOTS	115 E PARK AVE STE 1	TALLAHASSEE, FL 32301	PAC	CHE
2020	P4	07/14/2020	5,000.00	RAVE INVESTMENTS INC	301 BEACH RD UNIT 1	SARASOTA, FL 34242	REAL ESTATE	CHE
2020	P4	07/14/2020	11,400.00	SCHROEDER MANATEE RANCH, INC	14400 COVENANT WAY	LAKEMOOD RANCH, FL 34202	LAND DEVELOPER	CHE
2020	P4	07/15/2020	7,000.00	BENDERSON DEVELOPMENT CO, LLC	570 DELAWARE AVE	BUFFALO, NY 14202	LAND DEVELOPMENT	CHE
2020	P6	07/28/2020	1,000.00	BISPHAM PAUL	8000 IBIS ST	SARASOTA, FL 34241	AGRICULTURE	CHE
2020	P6	07/31/2020	10,000.00	BENDERSON DEVELOPMENT CO, LLC	570 DELAWARE AVE	BUFFALO, NY 14202	LAND DEVELOPMENT	CHE
2020	P6	07/31/2020	2,250.00	INDIAN LAKES SRQ INC	1250 HIDDEN HARBOR WAY	SARASOTA, FL 34242	REAL ESTATE INVEST	CHE
2020	P6	07/31/2020	2,250.00	MEDRED ROBERT	5972 RIVER FOREST CIR	BRADENTON, FL 34203	REAL ESTATE	CHE
			112,000.00					

22 Contribution(s) Selected

[Query the Campaign Finance Data Base](#)

[\(Department of State\)](#) [\(Division of Elections\)](#) [\(Candidates and Races\)](#) [\(Campaign Finance Information\)](#)

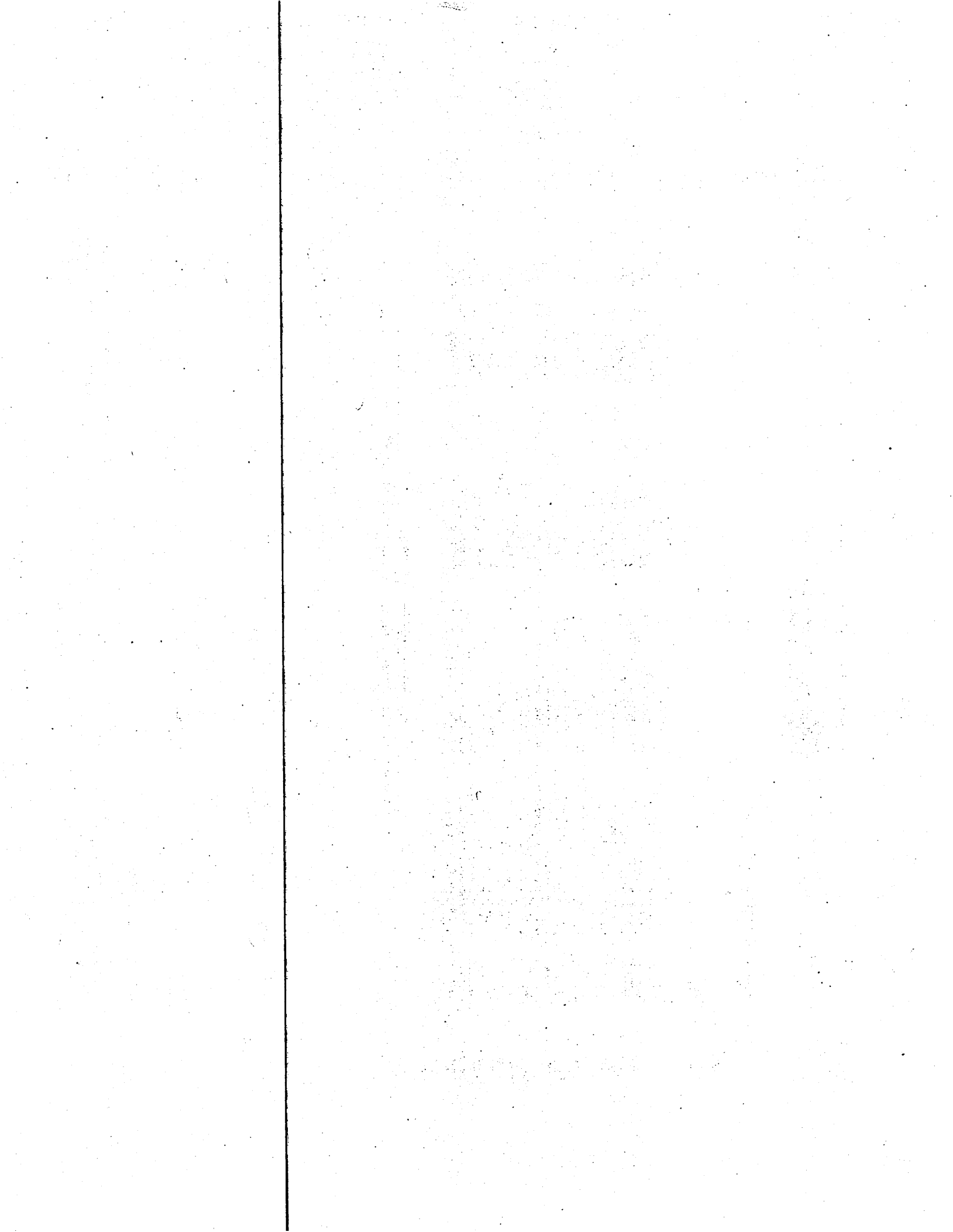


EXHIBIT B



Florida Elections Commission

107 West Gaines Street, Suite 224 Tallahassee, Florida 32399-6596

Telephone: (850) 922-4539 · Facsimile: (850) 921-0783

FEC@myfloridalegal.com · www.fec.state.fl.us



January 26, 2021

George Thurlow
1302 52nd St. S.
Gulfport, FL 33707

RE: Case No.: FEC 20-295; Respondent: Eric Robinson

Dear Mr. Thurlow:

The Florida Elections Commission has received your complaint alleging violation of Florida's election laws.

Complainant alleged that Respondent, as Treasurer for Florida Country, a political committee (PC) registered with the Division of Elections, originally reported receipt of a \$2,500 contribution from Queensgate Homes, Inc. (Queensgate), a Canadian corporation, on the PC's 2020 M4 report. Complainant filed a complaint with the Federal Elections Commission alleging that Respondent improperly accepted a contribution from a foreign entity.

Complainant alleged that Respondent subsequently amended Florida Country's 2020 M4 report, changing the contributor name to "Queensgate Homes, Inc. -- Vensota P.", and changing the contributor address to a Florida address, as a result of the federal complaint. The date and amount of the contribution remained the same.

Complainant filed this complaint with the Florida Elections Commission, alleging that Respondent violated Sections 106.07(5) and 106.19 F.S., by changing the contribution on the amended 2020 M4 report to "obscure the donation" from Queensgate. Complainant stated there is no legal connection between Queensgate and Vensota Properties, Inc., (Vensota), and he speculated that the contribution did not come from Vensota, but rather from Queensgate as originally reported.

As evidence, Complainant provided Division of Elections reporting information for Florida Country supporting his allegation that the contributor name and address for the contribution at issue were changed on an amended report, and that Respondent was its treasurer at the time.

In response to the complaint, Respondent acknowledged the change on the 2020 M4 report but stated the contribution as originally reported was the result of a clerical error, which was corrected on an amended report. Respondent stated that the contribution was received from Vensota, a Florida corporation that is a subsidiary of Queensgate, and that Queensgate's name and address were printed on the contribution check Florida Country received from Vensota, leading to the clerical error.

George Thurlow
January 26, 2021
Page 2
FEC 20-295

Respondent provided Sunbiz information for Vensota showing it is a Florida for-profit corporation with the same address specified by Respondent on the amended 2020 M4 report. Respondent also attached a letter from the legal counsel of Queensgate and Vensota clarifying that Queensgate handles administrative functions for Vensota, including the issuance of checks drawn on Vensota's own account, which is comprised of Vensota's funds.

He added that Queensgate is not responsible for payment of Vensota related expenses; it merely administers the bank account. Rather, Vensota handles payment of its own expenses from funds provided to it by the project owners. He also stated that the checks written by Queensgate as part of its administrative functions contain the name and address of Queensgate but have Vensota's name in parentheses. A copy of the check was attached. The name on the check was "Queensgate Homes, Inc. (Vensota Properties)," and the address on the check was that of Queensgate, not Vensota.

Based on the letter provided by Respondent, Complainant's speculation that there was no connection between Queensgate and Vensota is incorrect, and it appears that the contribution was indeed from Vensota, not Queensgate. Therefore, it does not appear that Respondent improperly amended the M4 report to "obscure the donation."

For these reasons, I find the complaint to be Legally Insufficient.

If you have additional information to correct the stated ground(s) of insufficiency, please submit it within 14 days of the date of this letter. If no additional information is received correcting the stated grounds of insufficiency, this case will be closed. Enclosed is the form for submitting additional information. Should you submit an additional statement containing facts, your statement must contain your notarized signature. Any additional facts submitted to the Commission must be based on either personal information or information other than hearsay.

If you have any questions concerning the complaint, please contact us at fec@myfloridalegal.com.

Sincerely,



Tim Vaccaro
Executive Director

TV/med

Enclosure: Additional Complaint Information Form 2
cc: Benjamin J. Gibson and Rachel C. Procaccini, Attorneys for Respondent w/out Enclosure

EXHIBIT C



Florida Elections Commission

107 West Gaines Street, Suite 224 Tallahassee, Florida 32399-6596

Telephone: (850) 922-4539 · Facsimile: (850) 921-0783

FEC@myfloridalegal.com · www.fec.state.fl.us



February 26, 2021

Benjamin J. Gibson, Esquire
Shutts & Bowen, LLP
215 South Monroe Street, Suite 804
Tallahassee, Florida 32301

RE: Case No.: FEC 20-295; Respondent: Eric Robinson

Dear Mr. Gibson:

On January 26, 2021, the Florida Elections Commission notified George Thurlow that the complaint he filed on August 21, 2020 was legally insufficient. Since the Commission did not receive any additional information that corrected the stated grounds of legal insufficiency, this case is now closed.

If you have any questions, please contact us at fec@myfloridalegal.com or at the number listed above.

Sincerely,

Donna Ann Malphurs

Donna Ann Malphurs

DM/med

EXHIBIT D



State Attorney

ANDREW H. WARREN
Thirteenth Judicial Circuit
419 N. Pierce Street
Tampa, Florida 33602-4022
(813) 272-5400

December 29, 2020

The Honorable Ron DeSantis
Governor, State of Florida
Governor's Legal Office
400 S. Monroe St.
Tallahassee, Florida 32399-0001

ATTN: SUSAN SMITH

RE: Executive Order Number: 20-247 (Amending Executive Order 20-227)
Eric Robinson

Dear Governor DeSantis:

This letter is to advise you that the Thirteenth Judicial Circuit has completed the duties required under Executive Assignment 20-247 as follows:

State of Florida v. Eric Robinson:

Disposition: Please see attached Memo

Should you have any questions, or if I can be of any further assistance in this matter, please do not hesitate to contact me.

Sincerely,

ANDREW H. WARREN
STATE ATTORNEY


Kimberly P. Nindman
Chief Assistant State Attorney

KPH/bj

cc: State Attorney Ed Brodsky
Twelfth Judicial Circuit


EAS
1/4/21

Memo to File

FROM: Kimberly Hindman, Chief Assistant ASA
RE: Eric Robinson-Executive Assignment 12th Circuit
DATE: December 18, 2020
DECISION: NO FILE

This office received a request from the Governor's Office to accept an executive assignment from the 12th Circuit. The general nature of the request was to review the facts surrounding campaign reports which has been filed in the 12th circuit for a possible violation of Florida Statute § 106.07(5). The 12th circuit requested an executive assignment because the individual who was the subject of the investigation, Eric Robinson, was also involved in the political campaign of the elected State Attorney for the 12th circuit Ed Brodsky. The request came from Craig Schaeffer, the Chief Assistant in that circuit, and our office accepted the assignment.

ASA Hindman undertook the review of the case to make a filing decision. After receiving the materials from 12th, ASA Hindman enlisted the help of SAO Lead Investigator Brent Holder to gather some additional material. All material needed to make a filing decision were gathered during this process as well as during interviews conducted by ASA Hindman.

This matter began with a complaint made by George Thurlow. Both Eric Robinson and George Thurlow are highly active in local politics in the 12th circuit. As mentioned previously, Eric Robinson had a professional relationship with State Attorney Brodsky. Mr. Robinson was also a candidate himself for a school board position during the relevant time of these matters. Mr. Thurlow was active in the campaign of the opposing candidate of Mr. Robinson. Mr. Robinson ultimately lost the race.

Mr. Thurlow filed two complaints against Eric Robinson. The first was in April of 2020 with the Federal Elections Commission. The complaint with the Federal Elections Commission alleges that Robinson made a campaign filing that violates US Code regarding accepting money from foreign corporations. This alleged violation of federal law has no bearing on the analysis of this assignment. Mr. Thurlow filed a second complaint with the Florida Elections Commission in August of 2020 based on a separate filing by Mr. Robinson. Mr. Thurlow send a copy of his second filing to State Attorney Ed Brodsky's office asserting that Eric Robinson violated Florida Statute §106.07(5).

The State Attorney's Office does have jurisdiction to investigate and ultimately bring criminal charges under Florida Statute §106.25(1). Mr. Thurlow asserted that Eric Robinson

violated Florida Statute §106.07(5) which states “[a]ny campaign treasurer, candidate, or political committee chair who willfully certifies the correctness of any report while knowing that report is incorrect, false or incomplete commits a misdemeanor of the first degree...”

The facts surrounding these matters are the following. Eric Robinson served as the treasurer of a registered Florida PAC called “Florida Country.” In April of 2020, Mr. Robinson filed a report that included a campaign donation from Queensgate Homes/Vensota Properties in the amount of \$2,500 dollars. He listed the donor as Queensgate Homes. The check that was given to the PAC had the address of the parent company in Toronto, Canada. This sparked the first complaint filed with the Federal Elections Commission. When Eric Robinson learned of this complaint and the fact that the check had the address in Canada rather than the address of Vensota Properties, he amended the filing in August of 2020 to reflect the monies were given to the PAC by Vensota Properties.

Vensota Properties is a Florida Corporation that owns vacant land in the Sarasota area. It maintains offices in both Sarasota and Lakewood Ranch, Florida. Mr. Robinson’s dealings with obtaining the monies were through the Lakewood Ranch office. Mr. Robinson has counsel, Peter Collins, and he was contacted during the investigation. Mr. Collins was invited to share any information on Mr. Robinson’s behalf, and he did so.

During this review, ASA Hindman interviewed Mr. Thurlow, representatives of Vensota Properties as well as Eric Lipton, general counsel for the Florida Election Commission. It should be noted that pursuant to Florida Statute §106.25(7), all matters before the Florida Election Commission are exempt from Chapter 119 requests and it is also a misdemeanor to reveal any information regarding a pending complaint. Only if official action is taken can information be revealed. To date there has been no action by the Florida Election Commission.

This filing decision for this case is a no file. The State would have to prove that Mr. Robinson willfully certified a report he knew to be false, incomplete, or incorrect. When he filed the report in April, he listed the company as Queensgate. Mr. Robinson was dealing with a local Florida corporation during his duties. He amended the filing when he learned that the correct company name only Vensota Properties. Whether Mr. Robinson had learned this from Mr. Thurlow’s filing or any other way, he was duty bound to make sure the information is correct. He made the proper correction in August of 2020. This correction, however, does not somehow make his April filing willfully false, incomplete, or incorrect. The law requires that he would have the specific intent to commit this crime. The State does not have evidence to prove that Eric Robinson violated Florida Statute §106(5) and thus no charges will be filed. ASA Hindman has notified the respective parties of this decision.



Florida Elections Commission

107 West Gaines Street, Suite 224 Tallahassee, Florida 32399-6596

Telephone: (850) 922-4539 · Facsimile: (850) 921-0783

FEC@myfloridalegal.com · www.fec.state.fl.us



February 26, 2021

Benjamin J. Gibson, Esquire
Shutts & Bowen, LLP
215 South Monroe Street, Suite 804
Tallahassee, Florida 32301

RE: Case No.: FEC 20-295; Respondent: Eric Robinson

Dear Mr. Gibson:

On January 26, 2021, the Florida Elections Commission notified George Thurlow that the complaint he filed on August 21, 2020 was legally insufficient. Since the Commission did not receive any additional information that corrected the stated grounds of legal insufficiency, this case is now closed.

If you have any questions, please contact us at fec@myfloridalegal.com or at the number listed above.


Sincerely,

Donna Ann Malphurs

Donna Ann Malphurs

DM/med



RE: Case No. FEC 20-295; Respondent: Eric Robinson 
Florida Elections Commission to: George Thurlow
Sent by: **Donna Malphurs**

02/04/2021 02:04 PM

Dear Mr. Thurlow,

Thank you for clarifying your request is for all records pertaining to FEC 20-295. However, until the case closes, there are no public records responsive to your request. (Note: you have until February 10th to submit additional documentation to correct the stated grounds of insufficiency. At which time, if no response is received, the case will close and therefore become a public record).

Sincerely,

Donna Ann Malphurs
Agency Clerk/Public Information Officer

"George Thurlow"

Dear Ms. Malphurs: Yes, I am referring to any ca...

02/04/2021 01:40:22 PM

From: "George Thurlow" <george.thurlow@outlook.com>
To: "Florida Elections Commission" <fec@myfloridalegal.com>
Date: 02/04/2021 01:40 PM
Subject: RE: Case No. FEC 20-295; Respondent: Eric Robinson

Dear Ms. Malphurs:

Yes, I am referring to any case documents pertaining to FEC 20-295.

Thank you,

George Thurlow
George.thurlow@outlook.com
(727)685-9719

From: [Florida Elections Commission](#)
Sent: Thursday, February 4, 2021 1:39 PM
To: [George Thurlow](#)
Subject: RE: Case No. FEC 20-295; Respondent: Eric Robinson

Dear Mr. Thurlow,

Thank you for your email concerns regarding the executive director's finding in FEC 20-295. Your email has been provided to Mr. Vaccaro. In your letter dated February 3, 2021, you requested a copy of "any case documents that may be available."

For clarification purposes, are you asking for "any case documents" pertaining to FEC 20-295? Please advise.

Sincerely,

Donna Ann Malphurs
Agency Clerk/Public Information Officer

▼ "George Thurlow" ---02/03/2021 10:35:02 PM---To Whom It May Concern: Attached is a letter for Executive Director Vaccaro regarding the above ment

From: "George Thurlow" <george.thurlow@outlook.com>
To: "fec@myfloridalegal.com" <fec@myfloridalegal.com>
Date: 02/03/2021 10:35 PM
Subject: RE: Case No. FEC 20-295; Respondent: Eric Robinson

To Whom It May Concern:

Attached is a letter for Executive Director Vaccaro regarding the above mentioned complaint.

Best,

George Thurlow

George.thurlow@outlook.com

(727)685-9719

[attachment "Signed Florida Elections Commission Letter.pdf" deleted by Donna Malphurs/OAG]



RE: Case No. FEC 20-295; Respondent: Eric RobinsonGeorge Thurlow to:
fec@myfloridalegal.com 02/03/2021 10:35 PM

From: "George Thurlow" <george.thurlow@outlook.com>

To: "fec@myfloridalegal.com" <fec@myfloridalegal.com>

History:

This message has been replied to and forwarded.

1 Attachment



Signed Florida Elections Commission Letter.pdf

To Whom It May Concern:

Attached is a letter for Executive Director Vaccaro regarding the above mentioned complaint.

Best,

George Thurlow

George.thurlow@outlook.com

(727)685-9719

George Thurlow
1302 52nd St. S., Gulfport, FL 33707
Cell: (727)685-9719
George.thurlow@outlook.com

February 3, 2021

Tim Vaccaro
Executive Director
Florida Elections Commission
107 W. Gaines Street
Suite 224
Tallahassee, FL 32399-6596

Sent via email to fec@myfloridalegal.com

RE: Case No. FEC 20-295; Respondent: Eric Robinson

Dear Mr. Vaccaro:

I am in receipt of your January 26, 2021 letter finding my complaint against Eric Robinson legally insufficient based largely on the basis that the donation in question was made by Vensota Properties Inc. rather than Queensgate Homes Inc., meaning the amendment in question was accurate.

Since I do not have personal information, or information other than that in the public record, disputing this finding, I am not formally appealing the outcome of your investigation or determination about this complaint. However, I would like to point out that on Florida Country's 2020-M11 report, the \$2,500 contribution was refunded, notably to Queensgate Homes Inc. in Ontario, Canada rather to Vensota Properties in Lakewood Ranch, FL. I think this report by Florida Country is relevant to the findings. I have enclosed a copy of this report for your inspection. This seemingly contradicts the findings of the Florida Elections Commission that the donation came from Vensota Properties Inc..

I am also concerned by the fact that Mr. Robinson may have known the result of this investigation on January 25, 2021, one day before your letter to me and several days before I received it in the mail. While it is unclear whether Mr. Robinson is referring to the Florida Elections Commission or the related investigation by the 13th Judicial Circuit, Mr. Robinson clearly refers to an administrative process in a *Sarasota Herald-Tribune* article on the topic published on January 25th.¹ And while not your office, the 13th Judicial Circuit never followed up with me as they said they would regarding their decision whether to charge (although their decision not to charge did not surprise me given the high threshold for criminal charges). Between filing the complaint in August 2020 and receiving this letter on February 1st, 2021, I

¹ <https://www.heraldtribune.com/story/news/education/2021/01/25/state-drops-robinson-campaign-finance-inquiry/6669578002/>

received no communication from the Florida Elections Commission. I feel that Mr. Robinson's advance knowledge of the outcome of this investigation allowed him to negatively portray me in the press, and made me the subject of harassment on social media. While I released the complaint to the Federal Elections Commission to the press, I never released this complaint to the Florida Elections Commission to the press but rather the press learned about it through Gov. DeSantis's executive order switching the criminal investigation from the 12th to the 13th Judicial Circuit because Mr. Robinson is 12th Judicial Circuit State Attorney Ed Brodsky's Campaign Treasurer. On a whole, this experience makes me less likely to report potential violations of elections law to the Florida Elections Commission or to law enforcement.

If permitted under Florida's Sunshine Laws, I would like to request that you send me any case documents that may be available. I would like to have them for my records. If such records cannot be made available, please let me know as well.

Thank you for allowing me to express my concerns about this investigation to you. While I do not expect any follow-up communication except regarding my public records request, feel free to communicate with me regarding this letter by either email or US Mail.

Sincerely,

A handwritten signature in black ink, appearing to read 'George Thurlow', with a stylized flourish at the end.

George Thurlow

Enclosures:

- (1) Report showing that Florida Country refunded contribution to Queensgate Homes Inc. of Ontario, Canada



Florida Department of State
Division of Elections

Campaign Contributions

Florida Country

[About the Campaign Finance Data Base](#)

Rpt Yr	Rpt Type	Date	Amount	Contributor Name	Address	City State Zip	Occupation	Typ	InKind	Desc
2020	M3	03/04/2020	5,000.00	GABBERT INVESTMENT GROUP LLC	1250 HIDDEN HARBOR WAY	SARASOTA, FL 34242	FINANCE SERVICES	CHE		
2020	M3	03/06/2020	5,000.00	MEDRED ROBERT	5972 RIVER FOREST CIR	BRADENTON, FL 34203	REAL ESTATE	CHE		
2020	M3	03/10/2020	5,000.00	SABA WILLIAM	240 S PINEAPPLE AVE STE 702	SARASOTA, FL 34236	ATTORNEY	CHE		
2020	M3	03/13/2020	5,000.00	MERRILL WILLIAM	1408 WESTBROOK DR	SARASOTA, FL 34231	ATTORNEY	CHE		
2020	M3	03/13/2020	500.00	MIDCO PETROLEUM COMPANY	2212 6TH ST	SARASOTA, FL 34237	PETROLEUM COMPANY	CHE		
2020	M3	03/17/2020	1,600.00	MATTAMY HOMES	19503 S WEST VILLAGES PKWY	VENICE, FL 34293	HOMEBUILDER	CHE		
2020	M3	03/18/2020	1,000.00	JOHN CANNON HOMES, INC	6710 PROFESSIONAL PKWY W	SARASOTA, FL 34240	REAL ESTATE BROKER	CHE		
2020	M3	03/26/2020	2,000.00	TRANS-UNITED DEVELOPMENT CORP	1651 WHITFIELD AVE UNIT 200	SARASOTA, FL 34243	FREIGHT MGMT	CHE		
2020	M3	03/30/2020	5,000.00	XAPA, LLC	108 W 13TH ST	WILMINGTON, DE 19801	REAL ESTATE	CHE		
2020	M3	03/31/2020	500.00	CORE CONSTRUCTION SERVICES OF	8027 COOPER CREEK BLVD STE 110	UNIVERSITY PARK, FL 34201	CONSTRUCTION	CHE		
2020	M4	04/21/2020	2,500.00	QUEENSGATE HOMES INC-VENSOTA P	11523 PALM BRUSH TRAIL, #417	LAKEWOOD RANCH, FL 34202	REAL ESTATE DEV	CHE		
2020	M4	04/30/2020	1,000.00	GRANT MICHAEL	*****	*****	MEDICAL TRANSPORT	CHE		
2020	P1	06/03/2020	19,000.00	BENDERSON DEVELOPMENT CO, LLC	570 DELAWARE AVE	BUFFALO, NY 14202	LAND DEVELOPMENT	CHE		
2020	P1	06/03/2020	800.00	TAYLOR MORRISON INC BUILDING S	4900 N SCOTTSDALE RD STE 2000	SCOTTSDALE, AZ 85251	PAC	CHE		
2020	P3	07/07/2020	20,000.00	SUN COAST PATRIOTS	115 E PARK AVE STE 1	TALLAHASSEE, FL 32301	PAC	CHE		
2020	P4	07/14/2020	5,000.00	RAVE INVESTMENTS INC	301 BEACH RD UNIT 1	SARASOTA, FL 34242	REAL ESTATE	CHE		
2020	P4	07/14/2020	11,400.00	SCHROEDER MANATEE RANCH, INC	14400 COVENANT WAY	LAKEWOOD RANCH, FL 34202	LAND DEVELOPER	CHE		
2020	P4	07/15/2020	7,000.00	BENDERSON DEVELOPMENT CO, LLC	570 DELAWARE AVE	BUFFALO, NY 14202	LAND DEVELOPMENT	CHE		
2020	P6	07/28/2020	1,000.00	BISPHAM PAUL	8000 IBIS ST	SARASOTA, FL 34241	AGRICULTURE	CHE		
2020	P6	07/31/2020	10,000.00	BENDERSON DEVELOPMENT CO, LLC	570 DELAWARE AVE	BUFFALO, NY 14202	LAND DEVELOPMENT	CHE		
2020	P6	07/31/2020	2,250.00	INDIAN LAKES SRQ INC	1250 HIDDEN HARBOR WAY	SARASOTA, FL 34242	REAL ESTATE INVEST	CHE		
2020	P6	07/31/2020	2,250.00	MEDRED ROBERT	5972 RIVER FOREST CIR	BRADENTON, FL 34203	REAL ESTATE	CHE		
2020	P7	08/12/2020	2,500.00	FLORIDIANS UNITED FOR A SUSTAI	120 S MONROE ST	TALLAHASSEE, FL 32301	PAC	CHE		
2020	G3	09/16/2020	2,500.00	MEDRED ROBERT	5972 RIVER FOREST CIR	BRADENTON, FL 34203	REAL ESTATE	CHE		
2020	G3	09/16/2020	10,000.00	SABA WILLIAM	240 S PINEAPPLE AVE STE 702	SARASOTA, FL 34236	ATTORNEY	CHE		
2020	G3	09/17/2020	5,000.00	JOHN CANNON HOMES, INC	6710 PROFESSIONAL PKWY W	LAKEWOOD RANCH, FL 34240	REAL ESTATE BROKER	CHE		
2020	G3A	09/22/2020	500.00	DERR FREDERICK	630 BAYSHORE DR	OSPREY, FL 34229	RETIRED	CHE		
2020	G3A	09/22/2020	500.00	FREDERICK DERR & COMPANY	PO BOX 2719	SARASOTA, FL 34230	EXCAVATING CONTRACT	CHE		
2020	G3A	09/22/2020	1,500.00	PHYSICIANS GROUP, LLC	4054 SAWYER RD	SARASOTA, FL 34233	HEALTH CARE	CHE		
2020	G3A	09/24/2020	20,000.00	BENDERSON DEVELOPMENT CO, LLC	570 DELAWARE AVE	BUFFALO, NY 14202	LAND DEVELOPMENT	CHE		
2020	G4	09/29/2020	1,000.00	CASSATA FUNDING LLC	7507 S TAMIAMI TRL	SARASOTA, FL 34231	REAL ESTATE	CHE		
2020	G4	09/29/2020	1,000.00	FLORIDIANS UNITED FOR A SUSTAI	120 S MONROE ST	TALLAHASSEE, FL 32301	PAC	CHE		
2020	G4	09/29/2020	5,000.00	NEAL LAND & NEIGHBORHOODS, LLC	5800 LAKEWOOD RANCH BLVD N	LAKEWOOD RANCH, FL 34240	REAL ESTATE DEV	CHE		
2020	G4	09/29/2020	3,500.00	SUNFIELD HOMES INC	3600 GALILEO DR STE 104	TRINITY, FL 34655	REAL ESTATE DEV	CHE		
2020	G4	09/29/2020	3,500.00	SUNTECH COMMUNITIES INC	3600 GALILEO DR STE 104	TRINITY, FL 34655	REAL ESTATE DEV	CHE		
2020	G4	09/29/2020	2,000.00	WATER RESOURCE ASSOCIATES	4260 W LINEBAUGH AVE	TAMPA, FL 33624	ENGINEERING FIRM	CHE		
2020	G4	09/29/2020	2,000.00	XAPA, LLC	108 W 13TH ST	WILMINGTON, DE 19801	REAL ESTATE	CHE		
2020	G4	10/01/2020	2,500.00	BARRINGTON GROUP INC	727 S ORANGE AVE	SARASOTA, FL 34236	PROPERTY MANAGEMENT	CHE		
2020	G4A	10/06/2020	10,000.00	TRANS-UNITED DEVELOPMENT CORP	1651 WHITFIELD AVE UNIT 200	SARASOTA, FL 34243	FREIGHT MGMT	CHE		
2020	D1	10/22/2020	2,500.00	BOONE, BOONE & BOONE, PA	1001 AVENIDA DEL CIRCO	VENICE, FL 34285	LAW FIRM	CHE		
2020	D1	10/23/2020	350.00	DISCOUNT CLEANERS	4297 CLARK RD	SARASOTA, FL 34233	DRY CLEANING	CHE		
2020	D1	10/23/2020	350.00	KEDARESHWAR OF SARASOTA, LLC	4200 N TAMIAMI TRL	SARASOTA, FL 34234	REAL ESTATE	CHE		
2020	D1	10/23/2020	300.00	PATEL JIGNESH	4200 N TAMIAMI TRL	SARASOTA, FL 34234	HOTEL OWNER	CHE		
2020	M11	11/17/2020	-2,500.00	QUEENSGATE HOMES INC	400-3800 STEELES AVE W	WOODBIDGE ONTARIO L4L 4G9, 00 00000	REAL ESTATE DEV	REF		

186,800.00

44 Contribution(s) Selected

[Query the Campaign Finance Data Base](#)

[\[Department of State\]](#) [\[Division of Elections\]](#) [\[Candidates and Races\]](#) [\[Campaign Finance Information\]](#)



Florida Elections Commission

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



January 26, 2021

George Thurlow
1302 52nd St. S.
Gulfport, FL 33707

RE: Case No.: FEC 20-295; Respondent: Eric Robinson

Dear Mr. Thurlow:

The Florida Elections Commission has received your complaint alleging violation of Florida's election laws.

Complainant alleged that Respondent, as Treasurer for Florida Country, a political committee (PC) registered with the Division of Elections, originally reported receipt of a \$2,500 contribution from Queensgate Homes, Inc. (Queensgate), a Canadian corporation, on the PC's 2020 M4 report. Complainant filed a complaint with the Federal Elections Commission alleging that Respondent improperly accepted a contribution from a foreign entity.

Complainant alleged that Respondent subsequently amended Florida Country's 2020 M4 report, changing the contributor name to "Queensgate Homes, Inc. -- Vensota P.", and changing the contributor address to a Florida address, as a result of the federal complaint. The date and amount of the contribution remained the same.

Complainant filed this complaint with the Florida Elections Commission, alleging that Respondent violated Sections 106.07(5) and 106.19 F.S., by changing the contribution on the amended 2020 M4 report to "obscure the donation" from Queensgate. Complainant stated there is no legal connection between Queensgate and Vensota Properties, Inc., (Vensota), and he speculated that the contribution did not come from Vensota, but rather from Queensgate as originally reported.

As evidence, Complainant provided Division of Elections reporting information for Florida Country supporting his allegation that the contributor name and address for the contribution at issue were changed on an amended report, and that Respondent was its treasurer at the time.

In response to the complaint, Respondent acknowledged the change on the 2020 M4 report but stated the contribution as originally reported was the result of a clerical error, which was corrected on an amended report. Respondent stated that the contribution was received from Vensota, a Florida corporation that is a subsidiary of Queensgate, and that Queensgate's name and address were printed on the contribution check Florida Country received from Vensota, leading to the clerical error.

George Thurlow
January 26, 2021
Page 2
FEC 20-295

Respondent provided Sunbiz information for Vensota showing it is a Florida for-profit corporation with the same address specified by Respondent on the amended 2020 M4 report. Respondent also attached a letter from the legal counsel of Queensgate and Vensota clarifying that Queensgate handles administrative functions for Vensota, including the issuance of checks drawn on Vensota's own account, which is comprised of Vensota's funds.

He added that Queensgate is not responsible for payment of Vensota related expenses; it merely administers the bank account. Rather, Vensota handles payment of its own expenses from funds provided to it by the project owners. He also stated that the checks written by Queensgate as part of its administrative functions contain the name and address of Queensgate but have Vensota's name in parentheses. A copy of the check was attached. The name on the check was "Queensgate Homes, Inc. (Vensota Properties)," and the address on the check was that of Queensgate, not Vensota.

Based on the letter provided by Respondent, Complainant's speculation that there was no connection between Queensgate and Vensota is incorrect, and it appears that the contribution was indeed from Vensota, not Queensgate. Therefore, it does not appear that Respondent improperly amended the M4 report to "obscure the donation."

For these reasons, I find the complaint to be Legally Insufficient.

If you have additional information to correct the stated ground(s) of insufficiency, please submit it within 14 days of the date of this letter. If no additional information is received correcting the stated grounds of insufficiency, this case will be closed. Enclosed is the form for submitting additional information. Should you submit an additional statement containing facts, your statement must contain your notarized signature. Any additional facts submitted to the Commission must be based on either personal information or information other than hearsay.

If you have any questions concerning the complaint, please contact us at fec@myfloridalegal.com.

Sincerely,



Tim Vaccaro
Executive Director

TV/med

Enclosure: Additional Complaint Information Form 2

cc: Benjamin J. Gibson and Rachel C. Procaccini, Attorneys for Respondent w/out Enclosure

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

ADDITIONAL COMPLAINT INFORMATION

Case Number: FEC 20-295

Pursuant to Rule 2B-1.0025, Florida Administrative Code, if you have additional information to correct the ground(s) of legal insufficiency stated in the attached letter, please explain in a concise narrative statement. Attach the statement and any relevant documentation to this form:

STATE OF FLORIDA

COUNTY OF _____

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

Original Signature of Person Bringing Complaint

Sworn to and subscribed before me this _____ day of _____, 20_____.

Signature of Officer Authorized to Administer
Oaths or Notary Public

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

Personally Known _____ Or Produced Identification _____

Type of Identification Produced _____

Any person who files a complaint while knowing that the allegations are false or without merit commits a misdemeanor of the first degree, punishable as provided in Sections 775.082 and 775.083, Florida Statutes.

FW: FEC 20-295

Timothy Vaccaro <Timothy.Vaccaro@myfloridalegal.com>

Thu 1/7/2021 10:16 AM

To: Cole Kekelis <Cole.Kekelis@myfloridalegal.com> 1 attachments (196 KB)

PR REQUEST FOR ERIC ROBINSON.pdf;

Cole, FYI.

Tim Vaccaro
Executive Director
Florida Elections Commission
107 West Gaines Street
The Collins Building, Suite 224
Tallahassee, FL 32399-1050
(850) 922-4539

From: Benjamin J. Gibson <BGibson@shutts.com>**Sent:** Monday, January 4, 2021 5:08 PM**To:** Timothy Vaccaro <Timothy.Vaccaro@myfloridalegal.com>**Subject:** FEC 20-295

Good afternoon, Tim.

Please see the attached memorandum from the 13th Circuit State Attorney's office detailing its "No File" decision in a criminal complaint filed by the same individual and containing identical allegations found within FEC 20-295.

If I can provide any additional information, do not hesitate to contact me.

Best,
-Ben



Benjamin J. Gibson

Partner

Shutts & Bowen LLP

215 South Monroe Street, Suite 804 | Tallahassee, FL 32301

Direct: (850) 241-1723 | Fax: (850) 241-1718

[E-Mail](#) | [Website](#)



State Attorney

ANDREW H. WARREN
Thirteenth Judicial Circuit
419 N. Pierce Street
Tampa, Florida 33602-4022
(813) 272-5400

December 29, 2020

The Honorable Ron DeSantis
Governor, State of Florida
Governor's Legal Office
400 S. Monroe St.
Tallahassee, Florida 32399-0001

ATTN: SUSAN SMITH

RE: Executive Order Number: 20-247 (Amending Executive Order 20-227)
Eric Robinson

Dear Governor DeSantis:

This letter is to advise you that the Thirteenth Judicial Circuit has completed the duties required under Executive Assignment 20-247 as follows:

State of Florida v. Eric Robinson:

Disposition: Please see attached Memo

Should you have any questions, or if I can be of any further assistance in this matter, please do not hesitate to contact me.

Sincerely,

ANDREW H. WARREN
STATE ATTORNEY

A handwritten signature in black ink, appearing to read "Kimberly P. Nindman".

Kimberly P. Nindman
Chief Assistant State Attorney

KPH/bj

cc: State Attorney Ed Brodsky
Twelfth Judicial Circuit

Handwritten note in a circle: ERB 1/4/21

Memo to File

FROM: Kimberly Hindman, Chief Assistant ASA
RE: Eric Robinson-Executive Assignment 12th Circuit
DATE: December 18, 2020
DECISION: NO FILE

This office received a request from the Governor's Office to accept an executive assignment from the 12th Circuit. The general nature of the request was to review the facts surrounding campaign reports which has been filed in the 12th circuit for a possible violation of Florida Statute § 106.07(5). The 12th circuit requested an executive assignment because the individual who was the subject of the investigation, Eric Robinson, was also involved in the political campaign of the elected State Attorney for the 12th circuit Ed Brodsky. The request came from Craig Schaeffer, the Chief Assistant in that circuit, and our office accepted the assignment.

ASA Hindman undertook the review of the case to make a filing decision. After receiving the materials from 12th, ASA Hindman enlisted the help of SAO Lead Investigator Brent Holder to gather some additional material. All material needed to make a filing decision were gathered during this process as well as during interviews conducted by ASA Hindman.

This matter began with a complaint made by George Thurlow. Both Eric Robinson and George Thurlow are highly active in local politics in the 12th circuit. As mentioned previously, Eric Robinson had a professional relationship with State Attorney Brodsky. Mr. Robinson was also a candidate himself for a school board position during the relevant time of these matters. Mr. Thurlow was active in the campaign of the opposing candidate of Mr. Robinson. Mr. Robinson ultimately lost the race.

Mr. Thurlow filed two complaints against Eric Robinson. The first was in April of 2020 with the Federal Elections Commission. The complaint with the Federal Elections Commission alleges that Robinson made a campaign filing that violates US Code regarding accepting money from foreign corporations. This alleged violation of federal law has no bearing on the analysis of this assignment. Mr. Thurlow filed a second complaint with the Florida Elections Commission in August of 2020 based on a separate filing by Mr. Robinson. Mr. Thurlow send a copy of his second filing to State Attorney Ed Brodsky's office asserting that Eric Robinson violated Florida Statute §106.07(5).

The State Attorney's Office does have jurisdiction to investigate and ultimately bring criminal charges under Florida Statute §106.25(1). Mr. Thurlow asserted that Eric Robinson

violated Florida Statute §106.07(5) which states “[a]ny campaign treasurer, candidate, or political committee chair who willfully certifies the correctness of any report while knowing that report is incorrect, false or incomplete commits a misdemeanor of the first degree...”

The facts surrounding these matters are the following. Eric Robinson served as the treasurer of a registered Florida PAC called “Florida Country.” In April of 2020, Mr. Robinson filed a report that included a campaign donation from Queensgate Homes/Vensota Properties in the amount of \$2,500 dollars. He listed the donor as Queensgate Homes. The check that was given to the PAC had the address of the parent company in Toronto, Canada. This sparked the first complaint filed with the Federal Elections Commission. When Eric Robinson learned of this complaint and the fact that the check had the address in Canada rather than the address of Vensota Properties, he amended the filing in August of 2020 to reflect the monies were given to the PAC by Vensota Properties.

Vensota Properties is a Florida Corporation that owns vacant land in the Sarasota area. It maintains offices in both Sarasota and Lakewood Ranch, Florida. Mr. Robinson’s dealings with obtaining the monies were through the Lakewood Ranch office. Mr. Robinson has counsel, Peter Collins, and he was contacted during the investigation. Mr. Collins was invited to share any information on Mr. Robinson’s behalf, and he did so.

During this review, ASA Hindman interviewed Mr. Thurlow, representatives of Vensota Properties as well as Eric Lipton, general counsel for the Florida Election Commission. It should be noted that pursuant to Florida Statute §106.25(7), all matters before the Florida Election Commission are exempt from Chapter 119 requests and it is also a misdemeanor to reveal any information regarding a pending complaint. Only if official action is taken can information be revealed. To date there has been no action by the Florida Election Commission.

This filing decision for this case is a no file. The State would have to prove that Mr. Robinson willfully certified a report he knew to be false, incomplete, or incorrect. When he filed the report in April, he listed the company as Queensgate. Mr. Robinson was dealing with a local Florida corporation during his duties. He amended the filing when he learned that the correct company name only Vensota Properties. Whether Mr. Robinson had learned this from Mr. Thurlow’s filing or any other way, he was duty bound to make sure the information is correct. He made the proper correction in August of 2020. This correction, however, does not somehow make his April filing willfully false, incomplete, or incorrect. The law requires that he would have the specific intent to commit this crime. The State does not have evidence to prove that Eric Robinson violated Florida Statute §106(5) and thus no charges will be filed. ASA Hindman has notified the respective parties of this decision.



Re: Response to FEC 20-295
Timothy Vaccaro to: Benjamin J. Gibson
Cc: "Florida Elections Commission"

09/09/2020 04:22 PM

From: "Timothy Vaccaro" <Timothy.Vaccaro@myfloridalegal.com>
To: "Benjamin J. Gibson" <BGibson@shutts.com>
Cc: "Florida Elections Commission" <fec@myfloridalegal.com>

History: This message has been forwarded.

No worries!

From: Benjamin J. Gibson <BGibson@shutts.com>
Sent: Wednesday, September 9, 2020 4:21:19 PM
To: Timothy Vaccaro <Timothy.Vaccaro@myfloridalegal.com>
Cc: Florida Elections Commission <fec@myfloridalegal.com>
Subject: RE: Response to FEC 20-295

Mr. Vaccaro-

Please forgive my typo on the misspelling of your last name below.

Best,

[Shutts_Logo.jpg]

Benjamin J. Gibson
Partner

Shutts & Bowen LLP
215 South Monroe Street, Suite 804 | Tallahassee, FL 32301
Direct: (850) 241-1723 | Fax: (850) 241-1718
E-Mail<mailto:BGibson@shutts.com> | Website<
https://urldefense.proofpoint.com/v2/url?u=http-3A__www.shutts.com&d=DwMFAG&c=VW5JLWXJaVcapeXcL_6RHSzucizvbTRh72MnzyhvSvo&r=8gKZgL-hjlBirDMuPSwflxrBDkriw7Wdu4V4otrSKdIFDm6d1XbVWkXC91tcmGUa&m=0iEbeedbZEOU7f7y4YPfSSK70NX01q6XSZfqZ66LAPQ&s=fayt7irXonF0QxxslR7g4QZPmuEmI3ZEZVcCUwLTarI&e=>>

From: Benjamin J. Gibson
Sent: Wednesday, September 9, 2020 4:19 PM
To: 'Timothy Vaccaro' <Timothy.Vaccaro@myfloridalegal.com>
Cc: 'Florida Elections Commission' <fec@myfloridalegal.com>
Subject: Response to FEC 20-295

Mr. Vaccaro-

On behalf of Respondent, Eric Robinson, please find a response to FEC
Complaint No.: 20-295.

Best,

[Shutts_Logo.jpg]

Benjamin J. Gibson
Partner

Shutts & Bowen LLP
215 South Monroe Street, Suite 804 | Tallahassee, FL 32301
Direct: (850) 241-1723 | Fax: (850) 241-1718
E-Mail<mailto:BGibson@shutts.com> | Website<
https://urldefense.proofpoint.com/v2/url?u=http-3A__www.shutts.com&d=DwMFAg&c=VW5JLWXJaVcapeXcL_6RHSzucizvbTRh72MnzyhvSvo&r=8gKZgL-hjlBirDMuPSwflxrBDkriw7Wdu4V4otrSKdIFDm6d1XbVWkXC91tcmGUa&m=0iEbeedbZEOU7f7y4YPfSSK70NX01q6XSZfqZ66LAPQ&s=fayt7irXonF0QxxslR7g4QZPmuEmI3ZEZVcCUwLTarI&e=>>



RE: Response to FEC 20-295 Benjamin J. Gibson to: 'Timothy Vaccaro' 09/09/2020 04:21 PM

Cc: "Florida Elections Commission"

From: "Benjamin J. Gibson" <BGibson@shutts.com>

To: "Timothy Vaccaro" <Timothy.Vaccaro@myfloridalegal.com>

Cc: "Florida Elections Commission" <fec@myfloridalegal.com>

History:

This message has been replied to and forwarded.

Mr. Vaccaro-

Please forgive my typo on the misspelling of your last name below.

Best,

Shutts_Logo.j
nn

Benjamin J. Gibson

Partner

Shutts & Bowen LLP

215 South Monroe Street, Suite 804 | Tallahassee, FL 32301

Direct: (850) 241-1723 | Fax: (850) 241-1718

[E-Mail](#) | [Website](#)

From: Benjamin J. Gibson

Sent: Wednesday, September 9, 2020 4:19 PM

To: 'Timothy Vaccaro' <Timothy.Vaccaro@myfloridalegal.com>

Cc: 'Florida Elections Commission' <fec@myfloridalegal.com>

Subject: Response to FEC 20-295

Mr. Vaccaro-

On behalf of Respondent, Eric Robinson, please find a response to FEC Complaint No.: 20-295.

Best,

Shutts_Logo.j
nn

Benjamin J. Gibson

Partner

Shutts & Bowen LLP

215 South Monroe Street, Suite 804 | Tallahassee, FL 32301

Direct: (850) 241-1723 | Fax: (850) 241-1718

[E-Mail](#) | [Website](#)



Response to FEC 20-295 Benjamin J. Gibson to: 'Timothy Vaccaro' 09/09/2020 04:18 PM
Cc: "Florida Elections Commission"
From: "Benjamin J. Gibson" <BGibson@shutts.com>
To: "Timothy Vaccaro" <Timothy.Vaccaro@myfloridalegal.com>
Cc: "Florida Elections Commission" <fec@myfloridalegal.com>

History:

This message has been replied to and forwarded.

1 Attachment



Response to Complaint FEC 20-295.pdf

Mr. Vaccaro-

On behalf of Respondent, Eric Robinson, please find a response to FEC Complaint No.: 20-295.

Best,

Shutts_Logo.j
nn

Benjamin J. Gibson

Partner

Shutts & Bowen LLP

215 South Monroe Street, Suite 804 | Tallahassee, FL 32301

Direct: (850) 241-1723 | Fax: (850) 241-1718

[E-Mail](#) | [Website](#)



BENJAMIN J. GIBSON
PARTNER
Shutts & Bowen LLP
215 South Monroe Street
Suite 804
Tallahassee, FL 32301
DIRECT (850) 241-1723
FAX (850) 241-1716
EMAIL BGibson@shutts.com

September 9, 2020

Tim Vaccaro
Executive Director
Florida Elections Commission
107 West Gaines Street, Suite 224
Tallahassee, FL 32399

Re: FEC 20-295: Respondent Eric Robinson

Dear Mr. Vaccaro:

This letter is in response to the complaint filed by George Thurlow (“Complainant”) regarding FEC 20-295 against my client, Eric Robinson, in his official capacity as treasurer for Florida Country, a Florida political committee. The complaint alleges a violation of sections 106.07(5) and 106.19, Florida Statutes. For the reasons that follow, the allegations contained within the complaint are not legally sufficient pursuant to Rule 2B-1.0025, and this complaint should be dismissed as such.

Florida Country received a campaign contribution from Vensota Properties, Inc., a business incorporated in Florida. Vensota Properties, Inc. is a subsidiary of Queensgate Homes, Inc., a Canadian-based business. Printed on this check is “Queensgate Homes, Inc. (Vensota Properties).” Also printed on the check is the address of Queensgate Homes, Inc, which is 400-3800 Steeles Ave. W. Woodbridge, Ontario L4L 4G9.

Florida Country made a clerical error by initially listing on its campaign finance report Queensgate Homes, Inc., along with its Canadian address, as the entity making the campaign contribution. Once Florida County became aware of the clerical error, it amended its campaign finance report to list “Queensgate Home Inc—Vensota P” with an address of 11523 Palm Brush Trail #417, Lakewood Ranch, FL 34202.

Section 106.07(5), Florida Statutes provides, in pertinent part:

[T]he political committee chair and campaign treasurer of the committee, in the case of a political committee, shall certify as to the correctness of each report; and each person so certifying shall bear the responsibility for the accuracy and veracity of each report. Any campaign treasurer . . . who willfully certifies the correctness of any report while knowing that such report is incorrect, false, or incomplete

commits a misdemeanor of the first degree, punishable as provided in s. 775.082 or s. 775.083.

Here, the Complainant has failed to present legally sufficient grounds to find that Eric Robinson had knowledge that the Florida's Country's report was incorrect when he certified its correctness. The initial documentation in the campaign finance report was a clerical mishap, which was amended to accurately reflect the entity who made the contribution, Vensota Properties, Inc. It is not a violation of section 106.07(5), Florida Statutes to amend a campaign finance report.

Next, the complaint alleges that Eric Robinson violated section 106.19(1), Florida Statutes. Specifically, the complaint states, "by amending the address to Lakewood Ranch, [Eric Robinson] willfully certified the correctness of incorrect and/or false information." *See* Complaint at p. 3. This allegation is also not legally sufficient. Section 106.19(1), Florida Statutes provides:

(1) Any candidate; campaign manager, campaign treasurer, or deputy treasurer of any candidate; committee chair, vice chair, campaign treasurer, deputy treasurer, or other officer of any political committee; agent or person acting on behalf of any candidate or political committee; or other person who knowingly and willfully:

- (a) Accepts a contribution in excess of the limits prescribed by s. 106.08;
- (b) Fails to report any contribution required to be reported by this chapter;
- (c) Falsely reports or deliberately fails to include any information required by this chapter; or
- (d) Makes or authorizes any expenditure in violation of s. 106.11(4) or any other expenditure prohibited by this chapter;

is guilty of a misdemeanor of the first degree, punishable as provided in s. 775.082 or s. 775.083.

The Complainant fails to allege legally sufficient grounds that Eric Robinson either knowingly or willfully violated section 106.19(1). The amendment to the campaign finance report was done to correct a clerical error and was done to the best of Florida Country's knowledge. As stated above, amending a campaign finance report is not a violation of section 106.19(1), Florida Statutes.

Attached is a letter from Kevin Drake, counsel for Queensgate Homes, Inc. and Vensota Properties, Inc. addressed to the Federal Election Commission in regards to a similar complaint. Eric Robinson, as Treasurer for Florida Country in all respects has relied upon the information provided by the contributor in reporting the source of this contribution and did not willfully certify the correctness of any report while knowing that such report was incorrect, false, or incomplete or

Tim Vaccaro
September 9, 2020
Page 3

did not knowingly and willfully falsely report or deliberately fail to include information on the report as the complaint alleges.

For the foregoing reasons, the undersigned respectfully requests that this complaint, FEC 20-295, be dismissed for lack of legal sufficiency.

Respectfully,

A handwritten signature in black ink, appearing to read "B. Gibson", with a stylized flourish at the end.

Ben Gibson
Counsel for Respondent

Attachment

J. KEVIN DRAKE, P.A.

ATTORNEYS AT LAW

J. KEVIN DRAKE

WRITER'S E-MAIL
kdrake@drakelawyers.com

1432 FIRST STREET
SARASOTA, FLORIDA 34236
TELEPHONE (941) 954-7750
FACSIMILE (941) 951-1509

August 14, 2020

Federal Election Commission
Office of Complaints
Examination & Legal Administration
Attn: Christal Dennis, Paralegal
1050 First Street, NE
Washington, DC 20463

SENT VIA EMAIL TO: cela@fec.gov

RE: MUR 7766 / Queensgate Homes, Inc. (Vensota Properties)

Dear Christal:

This letter is in response to the letter from Jeff S. Jordan, dated July 31, 2020, directed to my client Queensgate Homes, Inc. I have also received a copy of the subject complaint. I have attached the Designations of Counsel executed by both Queensgate Homes, Inc., and Vensota Properties, Inc.

Our understanding is that the complaint is filed against Florida Country, a registered Florida political committee and that a complaint has not been filed against either Queensgate Homes, Inc., or Vensota Properties, Inc.

In response to the correspondence my client provides the following information for consideration:

1. Vensota Properties, Inc. ("Vensota") is a Florida corporation. The U.S. Federal Employer Identification Number for Vensota is 27-5041769. A copy of the Florida Department of State's detail for Vensota is attached. Also attached is a copy of a letter dated August 13, 2020, from Mary L. King, P.L., which handles the tax filings for Vensota.
2. Vensota owns vacant land in Sarasota County, Florida, but otherwise conducts no other significant or regular business activities.
3. Vensota maintains offices in Sarasota and Lakewood Ranch, Florida.
4. Queensgate Homes, Inc. is a Canadian corporation which, among other things, is the administrative entity for Vensota and other similar entities. Although Queensgate Homes, Inc., issues checks on behalf of Vensota, it is from a segregated account funded solely for the purpose of project expenses related to the project owned by Vensota. No funds go in or out of that account that are not related completely and entirely to Vensota. Queensgate is not itself responsible for the payment of Vensota related expenses, it merely administers the bank

Federal Election Commission
Office of Complaints
Examination & Legal Administration
Attn: Christal Dennis, Paralegal
August 14, 2020
Page 2

account. Vensota handles the payment of its own expenses from funds provided to it by the project owners.

5. Attached is a copy of the check representing the contribution of \$2500.00 to Florida Country. The full name of the payor on the check is Queensgate Homes, Inc. (Vensota Properties).
6. The ledger initially filed by Florida Country in accordance with its reporting requirements referred to the subject contribution as being made by Queensgate Homes, Inc., without indicating the account designation of Vensota Properties. We understand that the filing has now been corrected by Florida Country.

It was certainly not the intention of Queensgate Homes, Inc., to violate the Federal Election Campaign Act or any election laws relative to contributions. If there was a technical violation, it was entirely inadvertent and unintentional, and was simply a matter of how the management of the various accounts are handled. For these reasons, and based on the facts recited above, we believe that no action should be taken against Queensgate Homes, Inc., in this matter.

Very truly yours,



J. KEVIN DRAKE

JKD/tlp
Enclosures
cc: client
E:\TracyP\WEEK2\FEC.VENSOTA.QUEENSGATE.L.wpd



FEDERAL ELECTION COMMISSION
 1050 First Street, NE
 Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL
 Provide one form for each Respondent/Witness

EMAIL cela@fec.gov

FAX 202-219-3923

AR/MUR/RR/P-MUR# 7766

Name of Counsel: J. Kevin Drake

Firm: J. Kevin Drake, P.A.


Address: 1432 First Street
Sarasota FL 34236

Office#: (941) 954-7750 Fax#: (941) 951-1509

Mobile#: (941) 374-1362

E-mail: kdrake@drakelawyers.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

8/14/2020
 Date

 (Signature - Respondent/Agent/Treasurer)
FAUSTO PACOMB
 (Name - Please Print)

PRESIDENT
 Title
Queensgate Homes, Inc.

RESPONDENT: Queensgate Homes, Inc.
 (Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 400-3800 Steeles Ave. W
 (Please Print)
Woodbridge, ON L4L 4G9

Home#: _____ Mobile#: _____

Office#: 905-851-5000 Fax#: _____

E-mail: lauren@queensgatehomes.com

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.



FEDERAL ELECTION COMMISSION
 1050 First Street, NE
 Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

EMAIL cela@fec.gov

FAX 202-219-3923

AR/MUR/RR/P-MUR# 7766

Name of Counsel: J. Kevin Drake

Firm: J. Kevin Drake, P.A.

Address: 1432 First Street
Sarasota FL 34236

Office#: (941) 954-7750 Fax#: (941) 951-1509

Mobile#: (941) 374-1362

E-mail: kdrake@drakelawyers.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

8-14-20

Date

(Signature - Respondent/Agent/Treasurer)

Fabian Bianchi

(Name - Please Print)

Managing Director
 Vensota Properties, Inc.

Title

f.bianchi@verizon.net

RESPONDENT: Queensgate Homes, Inc.
 (Please print Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 400-3800 Steeles Ave. W
 (Please Print)

Woodbridge, ON L4L 4G9

Home#: _____ Mobile#: _____

Office#: 905 851 5000 Fax#: _____

E-mail: lauren@queensgatehomes.com

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.

Detail by Entity Name

Florida Profit Corporation
 VENSOTA PROPERTIES, INC.

Filing Information

Document Number P10000095481
FEI/EIN Number 27-5041769
Date Filed 11/22/2010
State FL
Status ACTIVE

Principal Address

11523 PALM BRUSH TRAIL, #417
 LAKEWOOD RANCH, FL 34202

Mailing Address

11523 PALM BRUSH TRAIL, #417
 LAKEWOOD RANCH, FL 34202

Registered Agent Name & Address

J. KEVIN DRAKE, P.A.
 1432 FIRST STREET
 SARASOTA, FL 34236

Officer/Director Detail

Name & Address

Title D

PALOMBO, FAUSTO
 3800 STEELES AVE., WEST, SUITE 400
 WOODBRIDGE, ONTARIO L4L 4G9 OC

Title Director

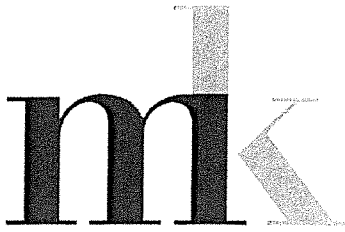
Bianchi, Fabian
 11523 PALM BRUSH TRAIL, #417
 LAKEWOOD RANCH, FL 34202

Annual Reports

Report Year	Filed Date
2018	04/29/2018
2019	04/24/2019
2020	06/29/2020

Document Images

06/29/2020 -- ANNUAL REPORT	View image in PDF format
04/24/2019 -- ANNUAL REPORT	View image in PDF format
04/29/2018 -- ANNUAL REPORT	View image in PDF format
04/30/2017 -- ANNUAL REPORT	View image in PDF format
04/30/2016 -- ANNUAL REPORT	View image in PDF format
04/29/2015 -- ANNUAL REPORT	View image in PDF format



LAW OFFICE OF
MARY E. KING, P.L.
Attorney and Counselor at Law

3389 Magic Oak Lane
Sarasota, Florida 34232
Office: (941) 906-7585 Facsimile: (941) 906-7586

◆*IRS Problem Resolution*◆*Tax Return Preparation*

August 13, 2020

Re: Vensota Properties Inc

To Whom It May Concern,

I am an Enrolled Agent that has prepared the 2016, 2017, 2018 and 2019 Federal and State tax returns for Vensota Properties Inc, a Florida Corporation with EIN 27-5041769

Please contact me if any additional information is required.

Sincerely,


Christopher D Johnsen

000121

QUEENSGATE HOMES INC.
(VENSOTA PROPERTIES)
400-3800 STEELES AVE. W.
WOODBRIIDGE, ONTARIO L4L 4G9

U.S. DOLLAR ACCOUNT

DATE 20 20-04-06
Y Y Y Y M M D D

PAY to Florida Company \$ 2500.00
the order of Two thousand five hundred $\frac{44}{100}$ DOLLARS  U.S. FUNDS



CANADIAN IMPERIAL BANK OF COMMERCE
2340 FINCH AVE. W.
NORTH YORK, ONTARIO M9M 2C7

QUEENSGATE HOMES INC.
(VENSOTA PROPERTIES)

PER J. P. [Signature]

RE _____





Eric Robinson - Case No: 20-295Marsha A. Poppell to: 'Florida Elections Commission'
09/01/2020 05:16 PM
Cc: "Benjamin J. Gibson", "Rachel C. Procaccini"
From: "Marsha A. Poppell" <MPoppell@shutts.com>
To: "'Florida Elections Commission'" <fec@myfloridalegal.com>
Cc: "Benjamin J. Gibson" <BGibson@shutts.com>, "Rachel C. Procaccini"
<RProcaccini@shutts.com>

History:

This message has been replied to and forwarded.

1 Attachment



Notice of Appearance - Case No. 20-295.pdf

Good afternoon:

Please find the Notice of Appearance for Benjamin Gibson and Rachel Procaccini in the above referenced case.

Thanks.

Shutts_Logo.j
pa

Marsha A. Poppell

Legal Assistant

Shutts & Bowen LLP

215 South Monroe Street, Suite 804 | Tallahassee, FL 32301

Direct: (850) 241-1730 | Fax: (850) 241-1716

[E-Mail](#) | [Website](#)

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

IN RE: ERIC ROBINSON,
_____ /

CASE NO.: FEC 20-295

NOTICE OF APPEARANCE

Benjamin J. Gibson and Rachel Procaccini of Shutts & Bowen, LLP hereby files notice of appearance in this cause as counsel for Eric Robinson.

Dated this 1st day of September, 2020.

Respectfully submitted,

/s/Benjamin Gibson _____

Benjamin J. Gibson

Florida Bar No. 085661

Rachel C. Procaccini

Florida Bar No: 1019275

SHUTTS & BOWEN, LLP

215 South Monroe Street, Suite 804

Tallahassee, Florida 32301

(850) 241-1723

ATTORNEYS FOR ERIC ROBINSON

COMPLAINT

The Commission's records and proceedings in a case are confidential until the Commission rules on probable cause. A copy of the complaint will be provided to the person against whom it is brought.

1. PERSON BRINGING COMPLAINT:

Name: George Thurlow Work Phone: () _____
Address: 1302 52nd St. S. Home Phone: (727) 685-9719
City: Gulfport County: Pinellas State: FL Zip Code: 33707

2. PERSON AGAINST WHOM COMPLAINT IS BROUGHT:

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

Name of individual or entity: Eric Robinson
Address: 133 Harbor Dr. S. Phone: (941) 488-7794
City: Venice County: Sarasota State: FL Zip Code: 34285

If individual is a candidate, list the office or position sought: Sarasota County School Board, District 3

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

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

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

3. ALLEGED VIOLATION(S):

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

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

SEE REVERSE SIDE OF DOCUMENT FOR ADDITIONAL INFORMATION

Any person who files a complaint while knowing that the allegations are false or without merit commits a misdemeanor of the first degree, punishable as provided in Sections 775.082 and 775.083, Florida Statutes.

4. OATH:

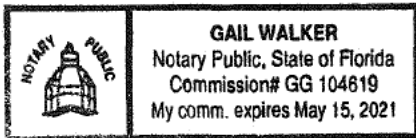
STATE OF FLORIDA
COUNTY OF Pinellas

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

Original Signature of Person Bringing Complaint

Sworn to and subscribed before me this 14 day of
August, 2020

Signature of Officer Authorized to Administer Oaths or Notary Public



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

Personally Known _____ Or Produced Identification X

Type of Identification Produced Florida Driver License

5. IMPROPERLY COMPLETED COMPLAINT FORMS MAY BE RETURNED:

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

NARRATIVE:

On July 28, 2020, I filed a complaint with the Federal Elections Commission against the Florida Country political committee and its Treasurer Eric Robinson for a violation of 52 USC § 30121, a statute that prohibits foreign nationals making contributions in federal, state, or local elections. The Florida Country political committee accepted a contribution from Queensgate Homes Inc., a real estate developer incorporated in the Canadian province of Ontario and owned by Fausto Palombo, a Canadian national. The Federal Elections Commission confirmed receipt of this complaint, and that it would be forwarded to Robinson for response within five days.

On Thursday, August 6th, 2020, I issued a press release about my complaint. I felt it was relevant for the public to know of this conduct as Eric Robinson is a candidate for Sarasota County School Board, District 3, which is an election that will be decided on August 18th, 2020, and that Florida Country has been sending mailers that praise Mike Moran, a candidate for Sarasota County Commission, District 1, facing a primary on August 18th, 2020. It should be noted that Mr. Robinson also serves as Moran's Campaign Treasurer, and Moran directs his campaign contributions to Mr. Robinson's accounting office. This press release did not get immediate coverage. On Monday, August 10th, 2020, the *Sarasota Phoenix*, an online newsletter operated by community activist Jon Susce spread word of the fact that I had filed the complaint. Shortly after Susce emailed out this news, I was contacted by someone who noticed that the contribution that was listed from Queensgate Homes Inc. at an Ontario address had since been amended to Queensgate Homes Inc. — Vensota with an address at a UPS Store in Lakewood Ranch, FL. This amendment was picked up in the coverage by the *Sarasota Herald-Tribune* and *North Port Sun*. Since Mr. Palombo, the owner of Queensgate Homes Inc., has another business named Vensota Properties, Inc., which is incorporated in Florida at that Lakewood Ranch address, the reporter for the *Sarasota Herald-Tribune* inaccurately attributed the contribution to Vensota Properties Inc.

I am alleging that by filing an amendment to Florida Country's campaign finance reports in direct response to a Federal Elections Commission complaint that improperly changed the address of Queensgate Homes Inc. and attempted to obscure the donation, that Eric Robinson appears to have violated Fla. Stat. § 106.07(5), which states "Any campaign treasurer, candidate, or political committee chair who willfully certifies the correctness of any report while knowing that such report is incorrect, false, or incomplete commits a misdemeanor of the first degree, punishable as provided in s. 775.082 or s. 775.083." Based on the *Sarasota Herald-Tribune* report that Robinson "said he had simply recorded the transaction and that no one would have known there was a donation from a firm with a Canadian address if he had not reported it," by amending the address to Lakewood Ranch, he willfully certified the correctness of incorrect and/or false information. This behavior would also seem to violate Fla. Stat. § 106.19.

I am filing this complaint based on knowledge I have obtained from filing the Federal complaint and related media coverage. Persons with additional knowledge on this matter may include:

Wendi Leach
Chair of Florida Country
133 Harbor Drive S.
Venice, FL 34285
(941)488-7794

The Honorable Michael A. Moran
Candidate for Sarasota County Commission,
District 1
5572 Chanteclair
Sarasota, FL 34235
(941)400-1140

Fausto Palombo
Owner of Queensgate Homes Inc. & Vensota
Properties Inc.
3800 Steeles Ave. W.
Suite 400
Woodbridge, Ontario, Canada L4L4G9
(905)264-0600

The UPS Store
Location of the revised address for Queensgate
Homes Inc.—Vensota
11523 Palmbrush Trail
Lakewood Ranch, FL 34202
(941)751-6245

SunTrust Bank
Depository for Florida Country
1670 South Venice Bypass
Venice, FL 34293
(941)882-5616

Ryan McKinnon
Education Reporter for the *Sarasota Herald-
Tribune*
1777 Main Street
Sarasota, FL 34236
(703)772-0123

Jon Susce
Publisher of the *Sarasota Phoenix*
2570 10th Street #105
Sarasota, FL 34237
(941)822-1121

George Thurlow
1302 52nd Street South
Gulfport, FL 33707
George.thurlow@outlook.com
Cell: (727)685-9719

July 28, 2020

Office of General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

To Whom It May Concern:

I wish to file a complaint against the following political committee and its officers:

Florida Country, *a registered political committee in the State of Florida*
Wendi Leach, Chair of Florida Country
Eric Robinson, Treasurer of Florida Country
133 Harbor Drive South
Venice, FL 34285

I am filing this complaint based on information I learned from public campaign finance reports. On April 21, 2020, Florida Country, the aforementioned political committee, accepted a contribution of \$2,500 from Queensgate Homes Inc., a corporation that appears to be domiciled in Canada (the reported address of Queensgate Homes Inc. is 400-3800 Steeles Ave. W., Woodbridge, Ontario, Canada). Despite this contribution being made to a state-level political committee, I believe it to be a violation of 52 USC § 30121 which prohibits foreign nationals in connection with a state or local election. Contributions to a state-level political committee are implicitly made in connection with state and local elections. Florida Country's attempts to participate in state and local elections is further evidenced by its spending \$24,215.97 on direct mail between June 30th and July 28th—all when vote by mail ballots for Florida's August 18th primary were mailed in Sarasota County, the base of this political committee, starting on July 2nd.

I have attached copies of Florida Country's organizational documents and copies of the aforementioned campaign finance reports to this Complaint.

If there are any additional questions regarding this complaint, I can be reached at the contact information above.

Sincerely,



George Thurlow

OATH

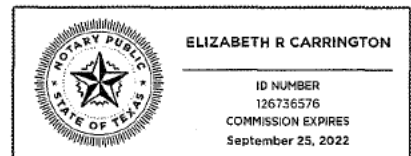
STATE OF Texas
COUNTY OF Montgomery

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

George Albert Doyle Thurlow

Original Signature of Person Bringing Complaint

Sworn to and subscribed before me this 28 day of
July, 20 20



Notarized online using audio-video communication

Elizabeth R Carrington

Signature of Officer Authorized to Administer Oaths or Notary Public

ELIZABETH R CARRINGTON Electronic Notary Public
(Print, Type, or Stamp Commissioned Name of Notary Public)

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

EXHIBITS:

- (1) Statement of Organization for Florida Country
- (2) Appointment of Campaign Treasurer for Florida Country
- (3) Report of Florida Country's Contributions
- (4) Report of Florida Country's Expenditures
- (5) 52 USC § 30121

**STATEMENT OF ORGANIZATION
OF POLITICAL COMMITTEE**

(PLEASE TYPE)

OFFICE USE ONLY
RECEIVED
DEPARTMENT OF
2020 FEB 14 AM 11:50

JAN 14 2020

1. Full Name of Committee FLORIDA COUNTRY	Telephone 941-200-6551
-----------------------------------------------------	----------------------------------

Mailing Address (include city, state and zip code)
133 HARBOR DR S
VENICE, FL 34285

Street Address (include city, state and zip code)
133 HARBOR DR S
VENICE, FL 34285

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

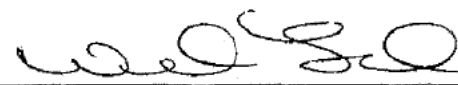
Name of Affiliated or Connected Organization	Mailing Address	Relationship
N/A		

3. Area, Scope and Jurisdiction of the Committee
To support or oppose candidates for statewide, multi-county, legislative or local office and other activities not prohibited by Chapter 106 Florida Statute.

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

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

Full Name	Mailing Address	Committee Title or Position
ERIC ROBINSON	133 HARBOR DR S VENICE, FL 34285	TREASURER

6. List by Name, Address and Position, Other Principal Officers, Including Officers and Members of the Finance Committee, If Any (include chairman's name)			
Full Name	Mailing Address	Committee Title or Position	
WENDI LEACH	133 HARBOR DR-S VENICE, FL 34285	CHAIRMAN	
7. List by Name, Address, Office Sought and Party Affiliation Each Candidate or Other Individual that this Committee is Supporting (if none, please indicate)			
Full Name	Mailing Address	Office Sought	Party
TO BE DETERMINED			
8. List Any Issues this Committee is Supporting: TO BE DETERMINED List Any Issues this Committee is Opposing: TO BE DETERMINED			
9. If this Committee is Supporting the Entire Ticket of a Party, Give Name of Party			
N/A			
10. In the Event of Dissolution, What Disposition will be Made of Residual Funds?			
Contribute to Candidates, Political Parties, Political Committees			
11. List all Banks, Safety Deposit Boxes, or Other Depositories Used for Committee Funds			
Name of Bank or Depository & Account Number		Mailing Address	
SUNTRUST BANK		1670 South Venice Bypass VENICE, FL 34293	
12. List all Reports Required to be Filed by this Committee with Federal Officials and the Names, Addresses and Positions of Such Officials, If Any			
Report Title	Dates Required to be Filed	Name & Position of Official	Mailing Address
FORM 8871 FORM 1120POL FORM 990 AS MAY BE REQUIRED	UPON FORMATION MAR 15-ANNUALLY MAY 15-ANNUALLY	INTERNAL REVENUE SERVICE	OGDEN UT 84201
STATE OF <u>FLORIDA</u>		<u>SARASOTA</u> COUNTY	
I, <u>WENDI LEACH</u> , certify that the information in this Statement of			
Organization is complete, true and correct.			
X 		<u>2-11-2020</u>	
Signature of Chairman of Political Committee		Date	


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

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2020 FEB 14 AM 11:50
STATE TREASURER'S OFFICE

CHECK APPROPRIATE BOX:

OFFICE USE ONLY



Original Appointment of Treasurer Reappointment of Treasurer Deputy Treasurer

1. Committee or Organization FLORIDA COUNTRY		2. Telephone (941) 200-6551	
3. Name of Treasurer or Deputy Treasurer ERIC ROBINSON		4. Email (optional)	
5. Telephone (optional) (941) 200-6551		6. Mailing Address 133 HARBOR DR S VENICE, FL 34285	
7. Street Address 133 HARBOR DR S VENICE, FL 34285			
8. The following bank has been designated as the <input checked="" type="checkbox"/> Primary Depository <input type="checkbox"/> Secondary Depository			
9. Name of Bank SUNTRUST		10. Street Address 1670 South Venice Bypass	
11. City VENICE		12. State FL	13. Zip Code 34293
14. Signature of Chairman X 		15. Name of Chairman (Print or Type) WENDI LEACH	

Campaign Treasurer's Acceptance of Appointment

I, **ERIC ROBINSON**, do hereby accept the appointment as
(Please Print or Type)
treasurer or deputy treasurer for **FLORIDA COUNTRY**
(Committee or Organization)

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

 2/12/2020 **X** 
Date Signature of Campaign Treasurer or Deputy Treasurer



Florida Department of State
Division of Elections

Campaign Contributions

Florida Country

[About the Campaign Finance Data Base](#)

Rpt Yr	Rpt Type	Date	Amount	Contributor Name	Address	City State Zip	Occupation	Typ InKind Desc
2020	M3	03/04/2020	5,000.00	GABBERT INVESTMENT GROUP LLC	1259 HIDDEN HARBOR WAY	SARASOTA, FL 34242	FINANCE SERVICES	CHE
2020	M3	03/06/2020	5,000.00	MEDRED ROBERT	5972 RIVER FOREST CIR	BRADENTON, FL 34203	REAL ESTATE	CHE
2020	M3	03/10/2020	5,000.00	SABA WILLIAM	240 S PINEAPPLE AVE STE 702	SARASOTA, FL 34236	ATTORNEY	CHE
2020	M3	03/13/2020	5,000.00	MERRILL WILLIAM	1408 WESTBROOK DR	SARASOTA, FL 34231	ATTORNEY	CHE
2020	M3	03/13/2020	500.00	MIDCO PETROLEUM COMPANY	2212 6TH ST	SARASOTA, FL 34237	PETROLEUM COMPANY	CHE
2020	M3	03/17/2020	1,600.00	HATTAMY HOMES	19503 S WEST VILLAGES PKWY	VENICE, FL 34293	HOMEBUILDER	CHE
2020	M3	03/18/2020	1,000.00	JOHN CANNON HOMES, INC	6710 PROFESSIONAL PKWY W	SARASOTA, FL 34240	REAL ESTATE BROKER	CHE
2020	M3	03/26/2020	2,000.00	TRANS-UNITED DEVELOPMENT CORP	1651 WHITFIELD AVE UNIT 200	SARASOTA, FL 34243	FREIGHT MGMT	CHE
2020	M3	03/30/2020	5,000.00	XAPA, LLC	108 W 13TH ST	WILMINGTON, DE 19801	REAL ESTATE	CHE
2020	M3	03/31/2020	500.00	CORE CONSTRUCTION SERVICES OF	8027 COOPER CREEK BLVD STE 110	UNIVERSITY PARK, FL 34201	CONSTRUCTION	CHE
2020	M4	04/21/2020	2,500.00	QUEENSGATE HOMES INC	400-3800 STEELES AVE W	WOODBIDGE, ONTARIO, XC 449	REAL ESTATE DEV	CHE
2020	M4	04/30/2020	1,000.00	GRANT MICHAEL	*****	*****	MEDICAL TRANSPORT	CHE
2020	P1	06/03/2020	19,000.00	BENDERSON DEVELOPMENT CO, LLC	570 DELAWARE AVE	BUFFALO, NY 14202	LAND DEVELOPMENT	CHE
2020	P1	06/03/2020	800.00	TAYLOR MORRISON INC BUILDING S	4900 N SCOTTSDALE RD STE 2000	SCOTTSDALE, AZ 85251	PAC	CHE
2020	P3	07/07/2020	20,000.00	SUN COAST PATRIOTS	115 E PARK AVE STE 1	TALLAHASSEE, FL 32301	PAC	CHE
2020	P4	07/14/2020	5,000.00	RAVE INVESTMENTS INC	301 BEACH RD UNIT 1	SARASOTA, FL 34242	REAL ESTATE	CHE
2020	P4	07/14/2020	11,400.00	SCHROEDER MANATEE RANCH, INC	14400 COVENANT WAY	LAKWOOD RANCH, FL 34202	LAND DEVELOPER	CHE
2020	P4	07/15/2020	7,000.00	BENDERSON DEVELOPMENT CO, LLC	570 DELAWARE AVE	BUFFALO, NY 14202	LAND DEVELOPMENT	CHE
			97,300.00					

18 Contribution(s) Selected

[Query the Campaign Finance Data Base](#)

[\[Department of State\]](#) [\[Division of Elections\]](#) [\[Candidates and Races\]](#) [\[Campaign Finance Information\]](#)



Florida Department of State
Division of Elections

Campaign Expenditures

Florida Country

This information is being provided as a convenience to the public, has been processed by the Division of Elections and should be cross referenced with the original report on file with the Division of Elections in case of questions.
[About the Campaign Finance Data Base](#)

Rpt Yr	Rpt Type	Date	Amount	Expense Paid To	Address	City State Zip	Purpose	Typ Reimb
2020	M3	03/16/2020	75.80	WEBELECT	10150 HIGHLAND MANOR DR STE 20	TAMPA, FL 33610	FINANCE SOFTWARE	MON
2020	M3	03/18/2020	133.58	DELUXE	PO BOX 64468	SAINT PAUL, MN 55164	BANKING SUPPLIES	MON
2020	M3	03/19/2020	200.00	JIM BOYD CAMPAIGN	133 HARBOR DR S	VENICE, FL 34285	CONTRIBUTION FL STATE SENATOR DIST 21	CAN
2020	M3	03/19/2020	21.40	ROBINSON GRUTERS & ROBERTS PA	133 HARBOR DR S	VENICE, FL 34285	REIMB CAMPAIGN RELATED EXPENSES	RMB
2020	M3	03/19/2020	200.00	TOMMY GREGORY CAMPAIGN	133 HARBOR DR S	VENICE, FL 34285	CONTRIBUTION FL STATE REP DISTRICT 73	CAN
2020	M4	04/01/2020	350.00	ROBINSON GRUTERS & ROBERTS PA	133 HARBOR DR S	VENICE, FL 34285	ACCOUNTING SERVICES	MON
2020	M5	05/01/2020	350.00	ROBINSON GRUTERS & ROBERTS PA	133 HARBOR DR S	VENICE, FL 34285	ACCOUNTING SERVICES	MON
2020	P1	06/01/2020	350.00	ROBINSON GRUTERS & ROBERTS PA	133 HARBOR DR S	VENICE, FL 34285	ACCOUNTING SERVICES	MON
2020	P1	06/09/2020	200.00	NANCY DETERT CAMPAIGN	133 HARBOR DR S	VENICE, FL 34285	CONTRIB SARASOTA COUNTY COMMISSIONER	CAN
2020	P2A	06/30/2020	4,793.10	POLITICAL INK, INC	1200 18TH ST NW STE 700	WASHINGTON, DC 20036	DIRECT MAIL/POSTAGE/SHIPPING ADS	MON
2020	P2A	07/01/2020	500.00	ROBINSON GRUTERS & ROBERTS PA	133 HARBOR DR S	VENICE, FL 34285	ACCOUNTING SERVICE	MON
2020	P2A	07/02/2020	4,793.10	POLITICAL INK, INC	1200 18TH ST NW STE 700	WASHINGTON, DC 20036	MAILERS/POSTAGE/SHIPPING	MON
2020	P3	07/07/2020	4,849.96	POLITICAL INK, INC	1200 18TH ST NW STE 700	WASHINGTON, DC 20036	MAILERS/POSTAGE/SHIPPING	MON
2020	P4	07/13/2020	4,902.66	POLITICAL INK, INC	1200 18TH ST NW STE 700	WASHINGTON, DC 20036	MAILERS/POSTAGE	MON
2020	P4	07/13/2020	500.00	THE THOMSON GROUP	639 OAKFORD RD	SARASOTA, FL 34240	SOCIAL MEDIA	MON
2020	P4	07/14/2020	78.75	SOLAZ CARSON	1281 A ENCORE WAY, FRUITVILLE	SARASOTA, FL 34236	CONTRACT SERVICE	MON
2020	P4	07/15/2020	52.50	BAUER GILLETTE	304 YACHT HARBOR DR	OSPREY, FL 34229	CONTRACT SERVICE	MON
2020	P4	07/16/2020	4,877.15	POLITICAL INK, INC	1200 18TH ST NW STE 700	WASHINGTON, DC 20036	MAILERS/POSTAGE/SHIP	MON

27,228.00

18 Expenditure(s) Selected

[Query the Campaign Finance Data Base](#)

[\[Department of State\]](#) [\[Division of Elections\]](#) [\[Candidates and Races\]](#) [\[Campaign Finance Information\]](#)

52 USC 30121: Contributions and donations by foreign nationals

Text contains those laws in effect on July 27, 2020

From Title 52-VOTING AND ELECTIONS

Subtitle III-Federal Campaign Finance

CHAPTER 301-FEDERAL ELECTION CAMPAIGNS

SUBCHAPTER I-DISCLOSURE OF FEDERAL CAMPAIGN FUNDS

Jump To:[Source Credit](#)[Codification](#)[Prior Provisions](#)[Amendments](#)[Effective Date](#)**§30121. Contributions and donations by foreign nationals****(a) Prohibition**

It shall be unlawful for-

(1) a foreign national, directly or indirectly, to make-

(A) a contribution or donation of money or other thing of value, or to make an express or implied promise to make a contribution or donation, in connection with a Federal, State, or local election;

(B) a contribution or donation to a committee of a political party; or

(C) an expenditure, independent expenditure, or disbursement for an electioneering communication (within the meaning of section 30104(f)(3) of this title); or

(2) a person to solicit, accept, or receive a contribution or donation described in subparagraph (A) or (B) of paragraph (1) from a foreign national.

(b) "Foreign national" defined

As used in this section, the term "foreign national" means-

(1) a foreign principal, as such term is defined by section 611(b) of title 22, except that the term "foreign national" shall not include any individual who is a citizen of the United States; or

(2) an individual who is not a citizen of the United States or a national of the United States (as defined in section 1101(a)(22) of title 8) and who is not lawfully admitted for permanent residence, as defined by section 1101(a)(20) of title 8.

(Pub. L. 92-225, title III, §319, formerly §324, as added Pub. L. 94-283, title I, §112(2), May 11, 1976, 90 Stat. 493; renumbered §319, Pub. L. 96-187, title I, §105(5), Jan. 8, 1980, 93 Stat. 1354; amended Pub. L. 107-155, title III, §§303, 317, Mar. 27, 2002, 116 Stat. 96, 109.)

CODIFICATION

Section was formerly classified to section 441e of Title 2, The Congress, prior to editorial reclassification and renumbering as this section.

PRIOR PROVISIONS

A prior section 319 of Pub. L. 92-225 was renumbered section 314, and is classified to section 30115 of this title.

Another prior section 319 of Pub. L. 92-225 was renumbered section 318, and was classified to section 439b of Title 2, The Congress, prior to repeal by Pub. L. 96-187.

AMENDMENTS**2002-**Pub. L. 107-155, §303(1), substituted "Contributions and donations by foreign nationals" for "Contributions by foreign nationals" in section catchline.

Subsec. (a). Pub. L. 107-155, §303(2), added subsec. (a) and struck out former subsec. (a) which read as follows: "It shall be unlawful for a foreign national directly or through any other person to make any contribution of money or other thing of value, or to promise expressly or impliedly to make any such contribution, in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office; or for any person to solicit, accept, or receive any such contribution from a foreign national."

7/28/2020

Subsec. (b)(2). Pub. L. 107-155, §317, inserted "or a national of the United States (as defined in section 1101(a)(22) of title 8)" after "United States".

EFFECTIVE DATE OF 2002 AMENDMENT

Amendment by Pub. L. 107-155 effective Nov. 6, 2002, see section 402 of Pub. L. 107-155, set out as an Effective Date of 2002 Amendment; Regulations note under section 30101 of this title.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 31, 2020

VIA EMAIL

george.thurlow@outlook.com

George Thurlow
1302 52nd Street South
Gulfport, FL 33707

RE: MUR 7766

Dear Mr. Thurlow:

This letter acknowledges receipt of your complaint on July 28, 2020, alleging possible violations of the Federal Election Campaign Act of 1971, as amended. The respondents will be notified of this complaint within five business days.

You will be notified as soon as the Federal Election Commission (FEC) takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be notarized and sworn to in the same manner as the original complaint. We have numbered this matter MUR 7766. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Any correspondence sent to the Commission must be addressed to one of the following below. As indicated in the FEC's Notice found at https://www.fec.gov/resources/cms-content/documents/website_notice_regarding_status_of_FEC_operations_3-17-20.pdf, the office's mailroom is not processing correspondence at this time and, therefore, we strongly encourage you to file via email.

Mail

Federal Election Commission
Office of Complaints Examination
& Legal Administration
Attn: Christal Dennis, Paralegal
1050 First Street, NE
Washington, DC 20463

OR

Email

cela@fec.gov

Sincerely,

Jeff S. Jordan
Assistant General Counsel
Complaints Examination &
Legal Administration

Enclosure:
Procedures

George Thurlow
1302 52nd Street South
Gulfport, FL 33707
George.thurlow@outlook.com
Cell: (727)685-9719

August 14, 2020

Federal Election Commission
Office of Complaints Examination & Legal Administration
Attn: Christal Dennis, Paralegal
1050 First Street, NE
Washington, DC 20463

Sent via email to CELA@FEC.gov

RE: MUR 7766

To Whom It May Concern:

I am writing in regards to MUR 7766 filed against Florida Country, Wendi Leach, and Eric Robinson. Since initially filing the complaint, I have come to learn some additional information that I wish to share with the Federal Elections Commission.

- (1) At some point of time between my filing the complaint on July 27th and roughly 11am on August 10, 2020, Florida Country's campaign finance reports were amended to list the contribution being from "Queensgate Homes Inc—Vensota P" with an address of 11523 Palm Bush Trail #417, Lakewood Ranch, FL 34202 instead of being from Queensgate Homes Inc. with a Woodbridge, Ontario address. **This change of address does not address the fundamental allegation—that Queensgate Homes Inc. is a foreign corporation (thus being a foreign citizen), and thus cannot donate in federal, state or local elections.** American jurisprudence typically is of the understanding that a corporation is either a citizen of where it is incorporated or where it's principal place of business is. Queensgate Homes Inc. is incorporated in the Canadian province of Ontario and maintains its headquarters in Woodbridge, Ontario. Under either of these standards, Queensgate Homes Inc. is based in Ontario. Additionally, the new address on the contribution is not that of a Queensbridge Homes Inc. office in the United States, but rather a rented mailbox at a UPS Store in a single-level

shopping center. This mailbox seems to be used by Fausto Palombo, the owner and CEO of Queensgate, for other business he owns that are incorporated in Florida. One of those business is named Vensota Properties Inc.. On August 10, 2020, the *Sarasota Herald Tribune* incorrectly published a story citing that the revised report names Vensota Properties as the contributor, which would be legal under the theory I alleged in my initial complaint. However, it should be noted that this contribution does not appear to have come from Vensota Properties Inc., a Florida corporation, but rather from Queensgate Homes Inc., a Canadian corporation. There is no legal connection between Queensgate Homes Inc. and Vensota Properties Inc. Additionally, media coverage of Queensgate Homes Inc. and Mr. Palombo over the years have identified both as Canadian.^{1 2} Specifically, the *Sarasota Herald-Tribune* reported the following on Mr. Palombo's citizenship—"Born in Italy, Palombo immigrated to Canada at age 7 in the late 1950s and eventually built homes in the Toronto area."³

- (2) Based on the amendment of Florida Country's reports after a complaint was filed with the Florida Division of Elections in a way that would deter suspicion of wrongdoing, I am alleging a probable violation of 18 U.S.C. § 1505 by Ms. Leach and Mr. Robinson. 18 U.S.C. § 1505 states "Whoever, with intent to avoid, evade, prevent, or obstruct compliance, in whole or in part, with any civil investigative demand duly and properly . . . shall be fined under this title, imprisoned not more than 5 years or, if the offense involves international or domestic terrorism (as defined in section 2331), imprisoned not more than 8 years, or both." By amending the report to reflect an entity and address other than that initially reported, the investigation into these allegations seems to be obstructed. I am awaiting a public records request from the Florida Department of State to see the exact date this report was amended.

Sincerely,

George Thurlow

¹ <http://insidereaalestate.heraldtribune.com/2011/05/25/bullish-canadian-investor-keeps-buying-sarasota-real-estate/>

² <http://gm5-1kweb.newscyclecloud.com/news/20150426/developer-finds-success-despite-bumps-in-the-road>

³ <http://gm5-1kweb.newscyclecloud.com/news/20131126/theater-company-sells-1-million-in-property>

OATH

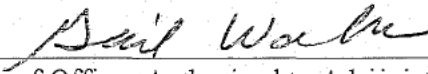
STATE OF **FLORIDA**
COUNTY OF **PINELLAS**

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



Original Signature of Person Bringing Complaint

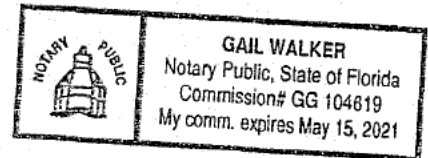
Sworn to and subscribed before me this 14 day of
August, 2020



Signature of Officer Authorized to Administer Oaths or Notary Public



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



Personally Known _____ Or Produced Identification X
Type of Identification Produced Florida Driver License

EXHIBITS:


- (1) Queensgate Homes Inc. Corporate Profile
- (2) Queensgate Homes Inc. website
- (3) The UPS Store info—11523 Palm Bush Trail
- (4) Report of Florida Country's Contributions as of August 11, 2020

Request ID: 024869212
Transaction ID: 76230559
Category ID: (C)CC/E

Province of Ontario
Ministry of Government Services

Date Report Produced: 2020/08/12
Time Report Produced: 08:01:47
Page: 1

Certified a true copy of the data as recorded on the Ontario Business Information System.



Director
Ministry of Government Services
Toronto, Ontario

CORPORATION PROFILE REPORT

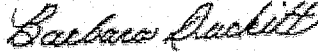
Ontario Corp Number	Corporation Name	Incorporation Date	
1209314	QUEENSGATE HOMES INC.	1996/11/19	
		Jurisdiction	
		ONTARIO	
Corporation Type	Corporation Status	Former Jurisdiction	
ONTARIO BUSINESS CORP.	ACTIVE	NOT APPLICABLE	
Registered Office Address	Date Amalgamated	Amalgamation Ind.	
3800 STEELES AVE WEST	NOT APPLICABLE	NOT APPLICABLE	
Suite # SUITE 400 WOODBIDGE ONTARIO CANADA L4L 4G9	New Amal. Number	Notice Date	
	NOT APPLICABLE	NOT APPLICABLE	
Mailing Address	Letter Date		
3800 STEELES AVE WEST	NOT APPLICABLE		
Suite # 400 WOODBIDGE ONTARIO CANADA L4L 4G9	Revival Date	Continuation Date	
	NOT APPLICABLE	NOT APPLICABLE	
	Transferred Out Date	Cancel/Inactive Date	
	NOT APPLICABLE	NOT APPLICABLE	
	EP Licence Eff.Date	EP Licence Term.Date	
	NOT APPLICABLE	NOT APPLICABLE	
	Number of Directors Minimum Maximum	Date Commenced in Ontario	Date Ceased in Ontario
	00001 00010	NOT APPLICABLE	NOT APPLICABLE
Activity Classification			
NOT AVAILABLE			

Request ID: 024869212
Transaction ID: 76230559
Category ID: (C)CC/E

Province of Ontario
Ministry of Government Services

Date Report Produced: 2020/08/12
Time Report Produced: 08:01:47
Page: 2

Certified a true copy of the data as recorded on the Ontario Business Information System.



Director
Ministry of Government Services
Toronto, Ontario

CORPORATION PROFILE REPORT

Ontario Corp Number	Corporation Name
1209314	QUEENSGATE HOMES INC.

Corporate Name History	Effective Date
QUEENSGATE HOMES INC.	1996/11/19

Current Business Name(s) Exist:	NO
Expired Business Name(s) Exist:	NO

Administrator: Name (individual / Corporation)	Address
FAUSTO PALOMBO	105 ROSSMULL CRESCENT WOODBIDGE ONTARIO CANADA L4L 7E2

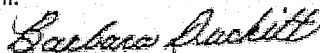
Date Began	First Director	Resident Canadian
1998/01/01	NOT APPLICABLE	
Designation	Officer Type	
DIRECTOR		Y

Request ID: 024869212
Transaction ID: 76230559
Category ID: (C)CC/E

Province of Ontario
Ministry of Government Services

Date Report Produced: 2020/08/12
Time Report Produced: 08:01:47
Page: 3

Certified a true copy of the data as recorded on the Ontario Business Information System.



Director
Ministry of Government Services
Toronto, Ontario

CORPORATION PROFILE REPORT

Ontario Corp Number

1209314

Corporation Name

QUEENSGATE HOMES INC.

Administrator:

Name (Individual / Corporation)

FAUSTO

PALOMBO

Address

105 ROSSMULL CRESCENT

WOODBIDGE
ONTARIO
CANADA L4L 7E2

Date Began

1998/01/01

First Director

NOT APPLICABLE

Designation

OFFICER

Officer Type

PRESIDENT

Resident Canadian

Y

Administrator:

Name (Individual / Corporation)

FAUSTO

PALOMBO

Address

105 ROSSMULL CRESCENT

WOODBIDGE
ONTARIO
CANADA L4L 7E2

Date Began

1998/01/01

First Director

NOT APPLICABLE

Designation

OFFICER

Officer Type

SECRETARY

Resident Canadian

Y

Request ID: 024869212
Transaction ID: 76230559
Category ID: (C)CC/E

Province of Ontario
Ministry of Government Services

Date Report Produced: 2020/08/12
Time Report Produced: 08:01:47
Page: 4

Certified a true copy of the data as recorded on the Ontario Business Information System.



Director
Ministry of Government Services
Toronto, Ontario

CORPORATION PROFILE REPORT

Ontario Corp Number

1209314

Corporation Name

QUEENSGATE HOMES INC.

Administrator:
Name (Individual / Corporation)

SILVANA
PALOMBO

Address

105 ROSSMULL CRESCENT

WOODBIDGE
ONTARIO
CANADA L4L 7E2

Date Began

2008/08/21

First Director

NOT APPLICABLE

Designation

OFFICER

Officer Type

TREASURER

Resident Canadian

Administrator:
Name (Individual / Corporation)

SILVANA
PALOMBO

Address

105 ROSSMULL CRESCENT

WOODBIDGE
ONTARIO
CANADA L4L 7E2

Date Began

2008/08/21

First Director

NOT APPLICABLE

Designation

OFFICER

Officer Type

VICE-PRESIDENT

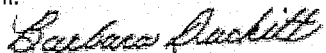
Resident Canadian

Request ID: 024869212
Transaction ID: 76230559
Category ID: (C)CC/E

Province of Ontario
Ministry of Government Services

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Time Report Produced: 08:01:47
Page: 5

Certified a true copy of the data as recorded on the Ontario Business Information System.



Director
Ministry of Government Services
Toronto, Ontario

CORPORATION PROFILE REPORT

Ontario Corp Number

1209314

Corporation Name

QUEENSGATE HOMES INC.

Last Document Recorded

Act/Code Description

Form

Date

CIA ANNUAL RETURN 2019

1C

2019/12/01 (ELECTRONIC FILING)

THIS REPORT SETS OUT THE MOST RECENT INFORMATION FILED BY THE CORPORATION ON OR AFTER JUNE 27, 1992, AND RECORDED IN THE ONTARIO BUSINESS INFORMATION SYSTEM AS AT THE DATE AND TIME OF PRINTING. ALL PERSONS WHO ARE RECORDED AS CURRENT DIRECTORS OR OFFICERS ARE INCLUDED IN THE LIST OF ADMINISTRATORS.

ADDITIONAL HISTORICAL INFORMATION MAY EXIST ON MICROFICHE.

The issuance of this certified report in electronic form is authorized by the Director of Companies and Personal Property Security Branch.

QUEENSGATE

HOME COMMUNITIES BUILDER GALLERY CONTACT AWARDS/TESTIMONIALS

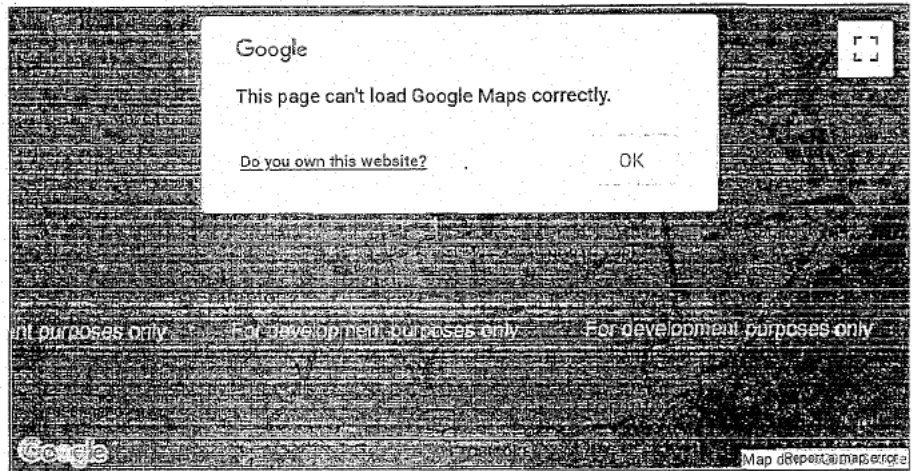


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Florida Department of State
Division of Elections

Campaign Contributions

Florida Country

[About the Campaign Finance Data Base](#)

Rpt Yr	Rpt Type	Date	Amount	Contributor Name	Address	City State Zip	Occupation	Typ InKind Desc
2020	M3	03/04/2020	5,000.00	GABBERT INVESTMENT GROUP LLC	1250 HIDDEN HARBOR WAY	SARASOTA, FL 34242	FINANCE SERVICES	CHE
2020	M3	03/06/2020	5,000.00	MEDRED ROBERT	5972 RIVER FOREST CIR	BRADENTON, FL 34203	REAL ESTATE	CHE
2020	M3	03/10/2020	5,000.00	SABA WILLIAM	240 S PINEAPPLE AVE STE 702	SARASOTA, FL 34236	ATTORNEY	CHE
2020	M3	03/13/2020	5,000.00	MERRILL WILLIAM	1408 WESTBROOK DR	SARASOTA, FL 34231	ATTORNEY	CHE
2020	M3	03/13/2020	500.00	MIDCO PETROLEUM COMPANY	2212 6TH ST	SARASOTA, FL 34237	PETROLEUM COMPANY	CHE
2020	M3	03/17/2020	1,600.00	MATTAMY HOMES	19503 S WEST VILLAGES PKWY	VENICE, FL 34293	HOMEBUILDER	CHE
2020	M3	03/18/2020	1,000.00	JOHN CANNON HOMES, INC	6710 PROFESSIONAL PKWY W	SARASOTA, FL 34240	REAL ESTATE BROKER	CHE
2020	M3	03/26/2020	2,000.00	TRANS-UNITED DEVELOPMENT CORP	1651 WHITFIELD AVE UNIT 200	SARASOTA, FL 34243	FREIGHT MGMT	CHE
2020	M3	03/30/2020	5,000.00	XAPA, LLC	108 W 13TH ST	WILMINGTON, DE 19801	REAL ESTATE	CHE
2020	M3	03/31/2020	500.00	CORE CONSTRUCTION SERVICES OF	8027 COOPER CREEK BLVD STE 110	UNIVERSITY PARK, FL 34201	CONSTRUCTION	CHE
2020	M4	04/21/2020	2,500.00	QUEENSGATE HOMES INC-VENSOTA P	11523 PALM BRUSH TRAIL, #417	LAKEWOOD RANCH, FL 34202	REAL ESTATE DEV	CHE
2020	M4	04/30/2020	1,000.00	GRANT MICHAEL	*****	*****	MEDICAL TRANSPORT	CHE
2020	P1	06/03/2020	19,000.00	BENDERSON DEVELOPMENT CO, LLC	570 DELAWARE AVE	BUFFALO, NY 14202	LAND DEVELOPMENT	CHE
2020	P1	06/03/2020	800.00	TAYLOR MORRISON INC BUILDING S	4900 N SCOTTSDALE RD STE 2000	SCOTTSDALE, AZ 85251	PAC	CHE
2020	P3	07/07/2020	20,000.00	SUN COAST PATRIOTS	115 E PARK AVE STE 1	TALLAHASSEE, FL 32301	PAC	CHE
2020	P4	07/14/2020	5,000.00	RAVE INVESTMENTS INC	301 BEACH RD UNIT 1	SARASOTA, FL 34242	REAL ESTATE	CHE
2020	P4	07/14/2020	11,400.00	SCHROEDER MANATEE RANCH, INC	14400 COVENANT WAY	LAKEWOOD RANCH, FL 34202	LAND DEVELOPER	CHE
2020	P4	07/15/2020	7,000.00	BENDERSON DEVELOPMENT CO, LLC	570 DELAWARE AVE	BUFFALO, NY 14202	LAND DEVELOPMENT	CHE
2020	P6	07/28/2020	1,000.00	BISPHAM PAUL	8000 IBIS ST	SARASOTA, FL 34241	AGRICULTURE	CHE
2020	P6	07/31/2020	10,000.00	BENDERSON DEVELOPMENT CO, LLC	570 DELAWARE AVE	BUFFALO, NY 14202	LAND DEVELOPMENT	CHE
2020	P6	07/31/2020	2,250.00	INDIAN LAKES SRQ INC	1250 HIDDEN HARBOR WAY	SARASOTA, FL 34242	REAL ESTATE INVEST	CHE
2020	P6	07/31/2020	2,250.00	MEDRED ROBERT	5972 RIVER FOREST CIR	BRADENTON, FL 34203	REAL ESTATE	CHE

112,800.00

22 Contribution(s) Selected

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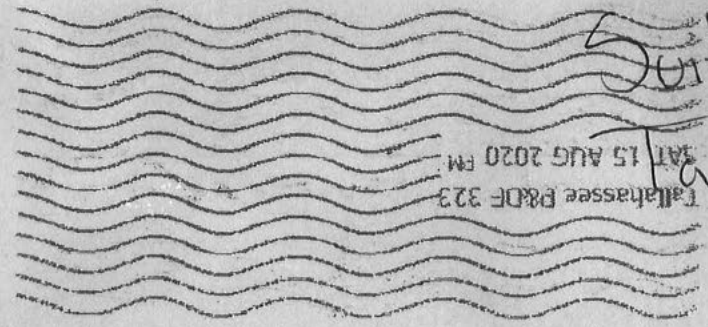
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Florida Elections Commission

107 W. Gaines St.

Suite 224

Tallahassee, FL 32399-1050



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