#### STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

#### In Re: Shelby Green

TO: Shelby Green PO Box 5651 Tallahassee, FL 32314-5651 Case No.: FEC 21-246

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

#### **NOTICE OF HEARING (INFORMAL HEARING)**

A hearing will be held in this case before the Florida Elections Commission on, August 15, 2023 at 8:30 a.m., or as soon thereafter as the parties can be heard, at the following location: Virtual Meeting via GoTo Webinar:

WEB PARTICIPATION: <u>https://attendee.gotowebinar.com/register/4391393799096818270</u>

AUDIO PARTICIPATION: 1 877 309 2074 ATTENDEE ACCESS CODE: 424-284-031

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 1, 2023 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.

#### STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

Florida Elections Commission, Petitioner,

v.

Case No.: FEC 21-246

Shelby Green, Respondent.

#### **ORDER OF PROBABLE CAUSE**

**THIS MATTER** was heard by the Florida Elections Commission (Commission) at its regularly scheduled meeting on May 16, 2023, in Tallahassee, Florida.

On April 11, 2023, Staff recommended to the Commission that there was probable cause to believe that the Florida Election Code was violated. The facts articulated in Staff's Recommendation are adopted by reference and incorporated herein. Based on the Complaint, Report of Investigation, Staff's Recommendation, and oral statements (if any) made at the probable cause hearing, the Commission finds that there is **probable cause** to charge Respondent with the following violation(s):

#### Count 1:

On or about February 2, 2021, Shelby Green, violated Section 106.07(5), Florida Statutes, when she certified that Randolph Bracy's amended 2021 TR Report was true, correct, and complete when it was not.

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#### Count 2:

On or around February 2, 2021, Shelby Green, violated Section 106.19(1)(c), Florida Statutes, when she deliberately failed to include information required by Chapter 106, Florida Statutes, on Randolph Bracy's 2021 TR Report.

DONE AND ORDERED by the Florida Elections Commission on May 16, 2023.

Tim Vaccaro, J.D., Executive Director For Joni Alexis Poitier, Vice Chair Florida Elections Commission

Copies furnished to: Stephanie J. Cunningham, General Counsel Shelby Green, Respondent Division of Elections, Complainant

#### **NOTICE OF RIGHT TO A HEARING**

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

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

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

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

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

#### STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

In Re: Shelby Green

Case No.: FEC 21-246

TO: Shelby Green PO Box 5651 Tallahassee, FL 32314-5651

Dial: 1 301 715 8592

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

772737

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

A hearing will be held in this case before the Florida Elections Commission on, May 16, 2023 at 8:30, or as soon thereafter as the parties can be heard, at the following location: Join Zoom Meeting:

https://us06web.zoom.us/meeting/register/tZMpdumuqTsqGt1MNuvpQBOI5XPapAI\_9zfC Audio Participation: Meeting ID: Passcode:

After registering, you will receive a confirmation email containing information about joining the meeting.

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

Tim Vaccaro

Executive Director Florida Elections Commission May 2, 2023 Please refer to the information below for further instructions related to your particular hearing:

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

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

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

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

#### STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

#### In Re: Shelby Green

#### Case No.: FEC 21-246

#### **STAFF RECOMMENDATION FOLLOWING INVESTIGATION**

Pursuant to Section 106.25(4)(c), Florida Statutes, undersigned staff counsel files this written recommendation for disposition of the referral in this case recommending that there is **probable cause** to charge Respondent with violating **Sections 106.07(5)**, and **106.19(1)(c)**, **Florida Statutes**. Based upon a thorough review of the Report of Investigation submitted on February 6, 2023, the following facts and law support this staff recommendation:

1. On March 15, 2021, the Florida Elections Commission ("Commission") received a referral from the Department of State, Division of Elections ("Division"), alleging that Shelby Green ("Respondent") violated Chapter 106, Florida Statutes.

2. Respondent was the treasurer for Randolph Bracy, a 2020 candidate for State Senator, District 11. (ROI Exhibit 1)<sup>1</sup>

3. By letter dated December 13, 2021, the Executive Director notified Respondent that Commission staff would investigate the following statutory provisions:

Section 106.07(5), Florida Statutes: Respondent, in her capacity as treasurer for Randolph Bracy, a 2020 candidate for State Senator, District 11, may have certified the campaign's 2021 TR report was true, correct, and complete when it was not, as alleged in the complaint.

Section 106.19(1)(c), Florida Statutes: Respondent, in her capacity as treasurer for Randolph Bracy, a 2020 candidate for State Senator, District 11, may have falsely reported or deliberately failed to include information in the campaign's 2021 TR report required by Chapter 106, Florida Statutes, as alleged in the complaint.

4. On November 14, 2017, Randolph Bracy filed his Appointment of Campaign Treasurer and Designation of Campaign Depository for Candidates form ("DS-DE 9") appointing Respondent as treasurer for his campaign. (ROI Exhibit 1)

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

5. By letter dated November 15, 2017, Kristi Reid Willis, Chief, Bureau of Election Records, sent Respondent a letter acknowledging that the Division had received Mr. Bracy's DS-DE 9. (ROI Exhibit 2)

6. The acknowledgment letter provided Respondent with a confidential pin number to grant access to the electronic filing system ("EFS"). The letter advised Respondent that all of the Division's publications and reporting forms were available on its website and directed Respondent to print out the *Calendar of Reporting Dates* as well as other relevant documents. (ROI Exhibit 2)

#### Alleged Violation: Section 106.07(5), Florida Statutes

7. Complainant alleged that Respondent violated Florida's election laws by certifying that the campaign's amended 2021 TR Report was true, correct, and complete when it was not.

8. Under Section 106.07, Florida Statutes, a campaign treasurer's report is required to contain all contributions received and all expenditures made during the reporting period. Additionally, Section 106.07(4)(a), Florida Statutes, provides that each report must also contain the full name, address, and occupation or description of business, together with the amount and date of such contributions, and the full name and address to whom expenditures have been made along with the amount, date, and purpose for said expenditures.

9. The campaign's 2021 TR Report was due on February 1, 2021. (ROI Exhibit 3; ROI Exhibit 4, page 1) On February 2, 2021, Respondent filed the original report. (ROI Exhibit 6, page 1) On the same day, Respondent filed an amended 2021 TR Report and certified the report as true, correct, and complete. (ROI Exhibit 6, page 1) The campaign's report was incomplete as Respondent failed to report contributions and expenditures as evidenced by the filing of a second amended report. (ROI Exhibits 5-7) (*See* ROI, p. 2,  $\P$  6)

10. Respondent acknowledged that she amended reports with large amounts of activity due to a lack of knowledge of Chapter 106, Florida Statutes, a lack of consistent assistance, unawareness of the financial activity until the last minute, unawareness of the high volume of activity until the last minute, and a lack of preparedness for the accelerated reporting schedule. (ROI Exhibit 8, page 2)

11. Respondent stated that she did not have access to the candidates' and committees' bank accounts but had to wait to receive information from the parties. (ROI Exhibit 9, page 3) She stated that she would receive large batches of check images at the last minute or the day before the reports were due. (ROI Exhibit 8, page 2; ROI Exhibit 9, page 3)

12. Respondent stated that she had volunteers assisting her, but many dropped out and the person assisting her was no longer available pre-election during the weekly reporting periods. (ROI Exhibit 8, page 2; ROI Exhibit 9, page 3)

13. Respondent stated that she was overwhelmed by the amount of financial activity that she was required to report. She stated that she prioritized filing the reports timely. She knew

that all reportable financial activity should have been disclosed on the original report but input as much information as possible before filing the reports. (ROI Exhibit 9, page 3)

14. Respondent stated that it was her understanding that if she did not file the report by the due date that the candidate or committee would be assessed a fine; however, she thought it was acceptable to file an amended report to add information as long as the original report was timely filed. (ROI Exhibit 9, page 3)

15. Respondent certified that the campaign's amended 2021 TR Report was true, correct, and complete when it was not.

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

16. Complainant alleged that Respondent violated Florida's election laws by falsely reporting or deliberately failing to include information required by Chapter 106, Florida Statutes. The reporting period at issue is the 2021 TR reporting period which ran from October 30, 2020, through February 1, 2021.

17. The campaign's 2021 TR Report was due on February 1, 2021 and was filed one day late. (ROI Exhibit 4, page 1) The original report disclosed one expenditure in the amount of \$100. (ROI Exhibit 6, page 2) The amended report disclosed one expenditure in the amount of \$9,000. The amendment changed the date, full name, address, purpose, and amount of the original expenditure. (ROI Exhibit 6, page 2) On February 22, 2021, 21 days after the due date of the report, Respondent filed a second amended 2021 TR Report disclosing an additional 4 monetary contributions totaling \$1.18, and 15 expenditures totaling \$45,330.16. (ROI Exhibit 5; ROI Exhibit 6, pages 3-4)

18. Chapter 106, Florida Statutes, requires treasurers to report any contributions received and any expenditures made for the purpose of influencing the results of an election.

19. Respondent deliberately failed to include information required by Chapter 106, Florida Statutes, on the campaign's 2021 TR Report.

20. "Probable Cause" is defined as reasonable grounds of suspicion supported by circumstances sufficiently strong to warrant a cautious person in the belief that the person has committed the offense charged. *Schmitt v. State*, 590 So. 2d 404, 409 (Fla. 1991). Probable cause exists where the facts and circumstances, of which an [investigator] has reasonably trustworthy information, are sufficient in themselves for a reasonable man to reach the conclusion that an offense has been committed. *Department of Highway Safety and Motor Vehicles v. Favino*, 667 So. 2d 305, 309 (Fla. 1st DCA 1995).

21. The facts set forth above show that Respondent was the treasurer for Randolph Bracy, a 2020 candidate for State Senator, District 11. Respondent certified that the campaign's amended 2021 TR Report was true, correct, and complete when it was not. Respondent deliberately failed to include information required by Chapter 106, Florida Statutes, on the campaign's 2021 TR Report.

Based upon these facts and circumstances, I recommend that the Commission find **probable cause** to charge Respondent with violating the following:

#### Count 1:

On or about February 2, 2021, Shelby Green, violated Section 106.07(5), Florida Statutes, when she certified that Randolph Bracy's amended 2021 TR Report was true, correct, and complete when it was not.

#### Count 2:

On or around February 2, 2021, Shelby Green, violated Section 106.19(1)(c), Florida Statutes, when she deliberately failed to include information required by Chapter 106, Florida Statutes, on Randolph Bracy's 2021 TR Report.

Respectfully submitted on April 11, 2023.

Stephanie J. Cunningham

Stephanie J. Cunningham General Counsel

I reviewed this Staff Recommendation this // day of April 2023.

Tim Vaccaro Executive Director

#### **Report of Investigation for Late-Reported Financial Activity**

#### Case Number: FEC 21-246

Sections 106.07(5), and 106.19(1)(c), Florida Statutes, a treasurer for a candidate or political committee certified campaign treasurer report(s) as true, correct, and complete when they were not, and falsely reported or deliberately failed to include all information required by Chapter 106, F.S., in campaign treasurer report(s). **Respondent:** Shelby Green **Respondent's Atty:** N/A

**Division of Elections (Division) Referral Filed:** March 15, 2021

**Respondent Type:** Treasurer for Candidate

#### I. Preliminary Information:

1. Respondent was the appointed campaign treasurer for Randolph Bracy, a 2020 candidate for State Senate, District 11. The Appointment of Campaign Treasurer and Designation of Campaign Depository (DS-DE 9) appointing Respondent was filed on November 14, 2017. To review the DS-DE 9, refer to Exhibit 1.

2. On November 15, 2017, the Division sent Respondent a letter acknowledging Respondent's appointment as the campaign treasurer for Randolph Bracy's campaign. The letter advised Respondent that all of the Division's publications and reporting forms are available on their website, including Chapter 106, Florida Statutes, the *Candidate and Campaign Treasurer Handbook*, and the *Calendar of Reporting Dates*. The letter further advised that it was Respondent's responsibility to read, understand, and follow the requirements of Florida's election laws. To review the acknowledgement letter, refer to Exhibit 2. To review the 2020 *Calendar of Reporting Dates*, refer to Exhibit 3.

#### II. Alleged Violation of Sections 106.07(5), and 106.19(1)(c), Florida Statutes:

3. I investigated whether Respondent violated these sections of the election laws by certifying that one or more campaign treasurer report(s) were true, correct, and complete when they were not, and falsely reporting or deliberately failing to include information in one or more campaign treasurer report(s).

4. Specifically, the referral alleged Respondent filed one or more original campaign treasurer report(s) that did not include certain financial transactions, which Respondent added to amended report(s) filed after the due date(s). The referral was only concerned with certain specified total contribution(s) and/or expenditure(s) added to certain amended report(s) and essentially alleged that by adding this activity to amended report(s) filed after the due date(s), Respondent demonstrated that she failed to report those transactions by the designated due date(s). The report at issue is: 2021 TR (Termination Report). To review the filing history, refer to Exhibit 4.

5. The 2021 TR was due on February 1, 2021. Respondent filed it on February 2, 2021, which was one day late. By filing the report, Respondent certified that it was true, correct, and complete. The report showed no monetary contributions, no in-kind contributions, and one monetary expenditure in the amount of \$9,000.00. To review the 2021 TR, refer to Exhibit 5. To review Division records evidencing when the activity referenced in this paragraph was filed on the amended report, refer to Exhibit 6, pages 1-2.<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> Respondent filed the original 2021 TR on February 2, 2021, at 12:00 a.m. The only transaction disclosed was a \$100.00 expenditure. The amended report at issue was filed on the same date at 8:07 a.m., and the \$100.00 expenditure was updated and replaced with the \$9,000.00 expenditure. The original TR is not at issue in the referral.

6. On February 22, 2021, which was 21 days after the due date for the report, Respondent filed an amended 2021 TR adding four monetary contributions in the total amount of \$1.18, and 15 monetary expenditures in the total amount of \$45,330.16. To review the 2021 TR, refer to Exhibit 5. To review Division records evidencing when the activity referenced in this paragraph was filed on the amended report, refer to Exhibit 6, pages 3-4. To review the applicable bank records, refer to Exhibit  $7^{2}$ .

7. On October 5, 2022, the Florida Elections Commission received a written response from Respondent, who stated that she served as treasurer for many candidates and committees during the past two election cycles. Respondent stated that she learned the EFS but was not well-versed with the election statutes and did not readily know the frequency and periodic quickening of reporting dates. Respondent explained that it became apparent she needed assistance, but the help she received was not constant and, "tapered off when I needed it the most," such as during pre-election weekly reporting and when termination reports were due. She added that it was not uncommon for candidates and committees to send her large batches of check images at the last minute, which prevented her from completing and filing reports timely and accurately. Respondent summarized the following factors that contributed to her amending reports after the due date to disclose sometimes large amounts of additional activity: lack of thorough knowledge of Chapter 106, Florida Statutes; lack of consistent and continued help with reports; lack of awareness of often high-volume financial activity until the last minute; and lack of preparation for quickened reporting dates. Respondent concluded by stating she has, "learned that these lessons come at a high price." To review Respondent's response, refer to Exhibit 8.

8. I called Respondent and interviewed her on two occasions in order to provide her an opportunity to respond to the referral. Respondent stated that she has never run for public office, though she has served as treasurer for several candidates and political committees. Respondent stated that she had not read Chapter 106, Florida Statutes, and that while she had not read the entire *Candidate and Campaign Treasurer Handbook*, she referred to it if she had any questions. To review the phone log, refer to Exhibit 9, interviews 1 and 3.

9. When asked if she was aware that all financial activity should be included on the original report, Respondent answered affirmatively. However, she added that it was her understanding that the campaign would be assessed a fine if a report was late, but that it was alright to amend a report if the original had been timely filed. Respondent stated she would input as much information as possible before filing the original report and would file an amended report to include information not on the original. To review the phone log, refer to Exhibit 9, interviews 1 and 3.

10. Respondent explained that she initially had several people working with her to enter information into EFS, but later the volunteers dropped out, which left her to do everything. She explained that she became overwhelmed by the amount of activity that occurred in each campaign, that in many instances she did not have access to campaign accounts, and that sometimes candidates and committees sent her incomplete information and/or would not send her information until the day before a report was due. Respondent indicated that, being overwhelmed, she prioritized filing original reports on time. She explained that she wanted to be transparent, so she reported the information she had and added the rest later. To review the phone log, refer to Exhibit 9, interviews 1 and 3.

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<sup>&</sup>lt;sup>2</sup> I subpoenaed campaign account records from the designated campaign depository.

11. When asked if she considered resigning as treasurer from some campaigns due to feeling overwhelmed, Respondent stated that she thought about it but did not want to leave candidates in a bad situation with no one to help them. However, Respondent indicated that she did not discuss her situation with any of the candidates. Respondent asserted that she has taken the following corrective measures: reading Chapter 106, Florida Statutes; reading the *Handbook*; hiring an assistant to help her input information; requiring access to campaign accounts; and requesting that candidates and committees use Truist as their depository so she can monitor the account activity electronically. To review the phone log, refer to Exhibit 9, interviews 1 and 3.

Marsie Vager

SIGNATURE OF INVESTIGATOR:

**Date:** February 6, 2023

## FLORIDA ELECTIONS COMMISSION REPORT OF INVESTIGATION Shelby Green -- FEC 21-246

LIST OF EXHIBITS						
Exhibits #s	Description of Exhibits					
Exhibit 1	DS DE 9					
Exhibit 2	Acknowledgement Letter					
Exhibit 3	2020 Reporting Dates					
Exhibit 4	Filing History					
Exhibit 5	2021 TR					
Exhibit 6	2021 TR DPA Report					
Exhibit 7	Bank Records					
Exhibit 8	Respondent's Written Response					
Exhibit 9	Phone Log					

	RECEIVED
APPOINTMENT OF CAMPAIGN TREASURER	DEPARTMENT OF STATE
AND DESIGNATION OF CAMPAIGN DEPOSITORY FOR CANDIDATES	2017 NOV 14 PM 2:04
(Section 106.021(1), F.S.)	CONTRENT OF STATE
(PLEASE PRINT OR TYPE)	DIVISION OF ELECTIONS
NOTE: This form must be on file with the qualifying officer before opening the campaign account.	OFFICE USE ONLY
1. CHECK APPROPRIATE BOX(ES):	easurer/Deputy 🔲 Depository 🔲 Office 🔲 Party
2. Name of Candidate (in this order: First, Middle, Last)	3. Address (include post office box or street, city, state, zip
Randolph Bracy	P.O. Box 521
4. Telephone 5. E-mail address	Ocoee, FL 34761
(407)2745404	
6. Office sought (include district, circuit, group number)	<ol> <li>If a candidate for a <u>nonpartisan</u> office, check if applicable:</li> </ol>
Senate District 11	My intent is to run as a Write-In candidate.
8. If a candidate for a partisan office, check block and fill i	n name of party as applicable: My intent is to run as a
Write-In No Party Affiliation	mocraticParty candidate.
9. I have appointed the following person to act as my	Campaign Treasurer Deputy Treasurer
10. Name of Treasurer or Deputy Treasurer	
11. Mailing Address	12. Telephone
P.0 Box 5651	(850) 661 3941
13. City 14. County 15. Stat Tallahasser Leon PL	e 16. Zip Code 17. E-mail address 32314 SBSLLC 2017 Agmail.com
18. I have designated the following bank as my	Primary Depository Secondary Depository
19. Name of Bank Suntrust	20. Address 10331 W. Colonial Dr.
21. City 22. County	23. State 24. Zip Code
Ucore Orange	1 12 34761
DESIGNATION OF CAMPAIGN DEPOSITORY	FOREGOING FORM FOR APPOINTMENT OF CAMPAIGN TREASURER AND AND THAT THE FACTS STATED IN IT ARE TRUE.
	26. Signature of Candidate
	X Cult
27. <b>Treasurer's Acceptance of Appointment</b>	(fill in the blanks and check the appropriate block)
i, (Please Print or Type Name)	, do hereby accept the appointment
designated above as: Campaign Treasurer	Deputy Treasurer.
11/14/11 X	Mulbahr
	Signature of Campaign Treasurer or Deputy Treasurer
	Rule 1S-2.0001, F.A.C.

DS-DE 9 (Rev. 10/10)



## FLORIDA DEPARTMENT Of STATE

RICK SCOTT Governor KEN DETZNER Secretary of State

November 15, 2017

Shelby Green, Treasurer Post Office Box 5651 Tallahassee, Florida 32314

Dear Ms. Green:

Your appointment as campaign treasurer for Randolph Bracy was filed in this office on November 14, 2017. Enclosed is a security envelope containing your confidential pin number to access the Division's Electronic Filing System (EFS) for submitting campaign treasurer's reports.

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

If you have questions concerning the EFS, you may call the Help Desk at (850) 245-6280.

Sincerely,

t Rieice Willis

Kristi Reid Willis, Chief Bureau of Election Records

KRW/mcc

Enclosure

pc: Senator Randolph Bracy (69607)

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



# Calendar of Reporting Dates for 2020 Candidates

for 2020 Candidates registered with the Division of Elections

Report Code	Cover Period	Due Date
2019 M12	12/1/19 - 12/31/19	1/10/2020
2020 M1	1/1/20 - 1/31/20	2/10/2020
2020 M2	2/1/20 - 2/29/20	3/10/2020
2020 M3	3/1/20 - 3/31/20	4/10/2020
2020 M4	4/1/20 - 4/30/20	5/11/2020
2020 M5	5/1/20 - 5/31/20	6/10/2020
2020 P1	6/1/20 - 6/12/20	6/19/2020
2020 P2	6/13/20 - 6/26/20	7/3/2020
2020 P3	6/27/20 – 7/10/20	7/17/2020
2020 P4	7/11/20 – 7/17/20	7/24/2020
2020 P5	7/18/20 – 7/24/20	7/31/2020
2020 P6	7/25/20 – 7/31/20	8/7/2020
2020 P7	8/1/20 - 8/13/20	8/14/2020
2020 G1	8/14/20 - 8/21/20	8/28/2020
2020 G2	8/22/20 - 9/4/20	9/11/2020
2020 G3	9/5/20 - 9/18/20	9/25/2020
2020 G4	9/19/20 - 10/2/20	10/9/2020
2020 G5	10/3/20 - 10/16/20	10/23/2020
2020 G6	10/17/20 - 10/29/20	10/30/2020

# **Termination Reports**

Report Code	Cover Period	Due Date
TR	After April Qualifying	7/23/2020
TR	After June Qualifying	9/10/2020
TR	Primary Election	11/16/2020
TR	General Election	2/1/2021

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## Florida Department of State - Division of Elections

#### Florida Election System Reports

me:				Acc	ount: <u>69607</u>					
tion:			Date Due	Туре	Date Filed	Status	Days	Fine Appealed	Amount	1
		~	2/1/2021		2/2/2021		Late	Assessed	Fined	
Acct:	69607		10/30/2020		10/30/2020	CLO	1	\$25.00	\$25.00	
					10/23/2020					
ype:	Candidate	~	10/9/2020		10/9/2020					
	Search	.t	9/25/2020		9/25/2020					
			9/11/2020		9/11/2020					
			8/28/2020		8/28/2020					
			8/14/2020		8/15/2020	CLO	1	\$375.00	\$0.00	
			8/7/2020		8/7/2020					
			7/31/2020		7/31/2020					
			7/24/2020		7/24/2020					
			7/17/2020	P3	7/17/2020					
			7/3/2020	P2	7/3/2020					
			6/19/2020	P1	6/19/2020					
			6/10/2020	M5	6/10/2020					
			5/11/2020	M4	5/11/2020					
			4/10/2020	М3	4/10/2020					
			3/10/2020	M2	3/11/2020	CLO	1	\$25.00	\$25.00	
			2/10/2020	M1	2/10/2020					
			1/10/2020	M12	1/10/2020					
			12/10/2019	M11	12/10/2019					
			11/12/2019	M10	11/12/2019					
			10/10/2019	M9	10/10/2019					
			9/10/2019	M8	9/10/2019					
			8/12/2019	Μ7	8/12/2019					
			7/10/2019	M6	7/10/2019					
			6/10/2019	M5	6/10/2019					
			5/10/2019	M4	5/10/2019					
			4/10/2019	М3	4/10/2019					
			3/11/2019	M2	3/11/2019					
			2/11/2019	M1	2/11/2019					
			1/10/2019	M12	1/10/2019					
			12/10/2018	M11	12/10/2018					
			11/13/2018	M10	11/14/2018	CLO	1	\$0.00	\$0.00	
			10/25/2018	M9	10/10/2018					
			9/10/2018	M8	9/10/2018					
			8/10/2018		8/10/2018					
			7/10/2018		7/10/2018					
			6/11/2018		6/11/2018					
			5/10/2018		5/8/2018					
			4/10/2018	M3	4/8/2018					

https://doesecure.dos.state.fl.us/FEC/FilingHistoryAsp?AcctNum=69607&cboElection=&cboType=CAN&txtName=

	FEC	- Candidate/Co	ommittee Fil	ing History R	eport		
2/12/2018	M1	2/12/2018					
1/10/2018	M12	1/10/2018					
12/11/2017	M11	12/11/2017					
11/13/2017	M10	11/13/2017					
10/10/2017	M9	10/11/2017	DFS	1	\$50.00	\$50.00	\$0.00
9/22/2017	M8	9/9/2017					
8/10/2017	M7	8/4/2017					
7/10/2017	M6	7/4/2017					
6/12/2017	M5	6/9/2017					
5/10/2017	M4	5/11/2017	DFS	1	\$50.00	\$50.00	\$0.00
4/10/2017	М3	4/10/2017					
3/11/2017	M2	3/10/2017					
2/10/2017	M1	2/14/2017	CLO	4	\$0.00	\$0.00	\$0.00

FLORIDA DEPARTMEN CAMPAIGN TRE	IT OF STATE, DIVI ASURER'S REPO		IONS		
(1) Randolph Bracy	(2)	69607			
Candidate, Committe or Party Name		I.D. Number			
(3) 1820 Merrivale Loop	Ocoee	FL	34761		
Address (number and street)	City	State	Zip Code		
(4) Check appropriate box(es):					
<ul> <li>Candidate (office sought):</li> <li>Political Committee</li> <li>Committee of Continuous Existance</li> <li>Party Executive Committee</li> </ul>		has DISBANDED E has DISBANDED			
(5) REPO	RT IDENTIFIERS				
Cover Period: From 10/30/2020 To 02	2/01/2021	Report Type:	TR		
Original X Amendment S	pecial Election Report				
(6) CONTRIBUTIONS THIS REPORT	(7	) EXPENDITURES	THIS REPORT		
Cash & Checks \$1.18	Monetary Expend	ditures	\$54,330.16		
Loans \$0.00	Transfers to Offic	ce Account	\$0.00		
Total Monetary \$1.18	Total Mone	ətary	\$54,330.16		
In-Kind \$0.00	(8) Other Distribu	utions			
C It is a first degree misdemeanor for any	ertification person to falsify a publ	ic record (ss.839.13	, F.S.)		
I certify that I have examined this report and it is true, correct and complete	I certify that I have examined this report and it is true, correct and complete				
Name of Treasurer Deputy Treasurer	Name of 🛛 🕅	Candidate 🗌	Chaiman (PC/PTY Only		
×	x				
Signature	Signature				

Prepared on: 3/11/21 9:28:10AM

Reviewed On: 2/22/21 5:11 pm

# ID: 09007 CAMPAIGN TREASURER'S REPORT - ITEMIZED EXPENDITURES Page 1 of 1 Name: Randolph Bracy Report: 2021 TR Period: 10/30/2020 to 02/01/2021

Name: Ra	ndolph Bracy		Report: <u>2021</u> <u>TR</u> Period: <u>10/30/2020</u>	to 02/0	)1/2021
		ecords in Fil	ed Report **		
Seq # Date	Full Name (Last, Suffix, First, Middle Street Address & City, State, Zip	Туре	Purpose	Amend	Amount
01/31/2021	EDUMATICS KNOWLEDGE SHÓP 7649 W COLONIAL DR ORLANDO, FL 32818	MON	EDUCATION RESEARCH/CONSULTING	UPD	\$9,000.00
1	SB SOLIUTIONS CONSULTING				\$100.00
44/04/00000		X			•
11/01/2020 2	, DJ IVORY ENT LLC			Histor	y 02/02/21
10/30/2020	12575 NW 27TH AVE APT # 203 MIAMI, FL 33167	MON	EVENT ENTERTAINMENT	ADD	\$300.00
3	JEFFERSON KENDRA	MON	GRAPHIC DESIGN		\$5,000.00
10/30/2020	5987 LEE VISTA BLVD ORLANDO, FL 32822	MON		ADD	
4 11/04/2020	BREAKFAST CLUB OF OCOEE 267 WEST RD, OCOEE, FL 34761 OCOEE, FL 34761	MON	FOOD & BEVERAGES	ADD	\$27.46
5 11/05/2020	4RIVERS SMOKEHOUSE 1047 S DILLARD ST, WINTER GARDEN, FL 34787	MON	FOOD & BEVERAGES	ADD	\$157.31
6	HOLMES ENTERTAINMENT				\$1,317.92
11/01/2020	1437 CAPE COVE BLVD ORLANDO, FL 32808	MON	VIDEOGRAPHY	ADD	<i></i>
7	MCWHITE SHARON	MON	SPONSORSHIP		\$140.00
11/01/2020	8350 SANDBERRY BLVD ORLANDO, FL 32819			ADD	
8	PUBLIX 7524 DR. PHILLIPS BLVD ORLANDO, FL 32819	MON	EVENT SUPPLIES	UPD	\$208.13
8	PUBLIX				\$206.95
11/18/2020	7524 DR. PHILLIPS BLVD ORLANDO, FL 32819	MON		ADD H	listory 02/22/21
9 11/20/2020	HOLMES ENTERTAINMENT 1437 CAPE COVE BLVD ORLANDO, FL 32808	MON	VIDEOGRAPHY	ADD	\$1,250.00
10	STALNECKER CHRISTIAN 11 S WESTERN AVE NASHVILLE, TN 37210	MON	MARKETING CONSULTING	ADD	\$5,000.00
11	KM CREATIVE WORKS LLC 5987 LEE VISTA BLVD	MON	SOCIAL MEDIA & MARKETING		\$10,000.00
11/03/2020	ORLANDO, FL 32822			ADD	<b>.</b>
12	JEFFERSON KENDRA 5987 LEE VISTA BLVD	MON	GRAPHIC DESIGN		\$1,800.00
12/01/2020	ORLANDO, FL 32822			ADD	
13	SB SOLUTIONS CONSULTING	MON	TREASURY & COMPLIANCE		\$1,093.20
12/01/2020	PO BOX 5651 TALLAHASSEE, FL 32314			ADD	
14	AVIS 3400 E SKY HARBOR BLVD, PHOENIX, AZ, 85034	MON	TRAVEL		\$143.76
01/25/2021	PHOENIX, AZ 85034			ADD	
15 12/01/2020	FROM THE HEART CHARITABLE FUND 1200 PREMIER DR STE 260 CHATTANOOGA, TN 37421	DIS	DISPOSITION OF FUNDS TO CHARITABLE ORGANIZATION	ADD	\$9,000.00
16	A TOTAL CONSULTING GROUP				\$9,892.38
11/20/2020	211 MAIN ST WINDERMERE, FL 34786	MON	MARKETING CONSULTING	ADD	+1,50 <b>2</b> .00

#### 9/29/2022

# Queued Items for 2021-TR

Account: **69607** Rpt Seq: **55** 

## STS 011 Randolph Bracy

ProcessDescription	Status	Submitter	Created	LastUpdate
Create Pending Report	Processing Complete	69607	2/2/2021 12:00:06 AM	2/2/2021 12:00:06 AM
File Pending Report	Processing Complete	69607	2/2/2021 12:00:40 AM	2/2/2021 12:00:40 AM
Amend Filed Report	Processing Complete	69607	2/2/2021 8:04:36 AM	2/2/2021 8:04:36 AM
Review Pending Report	Processing Complete	69607	2/2/2021 8:06:59 AM	2/2/2021 8:06:59 AM
File Pending Report	Processing Complete	69607	2/2/2021 8:07:22 AM	2/2/2021 8:07:22 AM
Amend Filed Report	Processing Complete	69607	2/2/2021 8:07:35 AM	2/2/2021 8:07:35 AM
Review Pending Report	Processing Complete	69607	2/8/2021 10:56:46 PM	2/8/2021 10:56:46 PM
Review Pending Report	Processing Complete	69607	2/22/2021 4:52:34 PM	2/22/2021 4:52:34 PM
Review Pending Report	Processing Complete	69607	2/22/2021 4:55:54 PM	2/22/2021 4:55:54 PM
Review Pending Report	Processing Complete	69607	2/22/2021 5:06:04 PM	2/22/2021 5:06:04 PM
Review Pending Report	Processing Complete	69607	2/22/2021 5:06:23 PM	2/22/2021 5:06:23 PM
Review Pending Report	Processing Complete	69607	2/22/2021 5:07:20 PM	2/22/2021 5:07:20 PM
File Pending Report	Processing Complete	69607	2/22/2021 5:09:04 PM	2/22/2021 5:09:04 PM
Amend Filed Report	Processing Complete	69607	2/22/2021 5:10:09 PM	2/22/2021 5:10:09 PM
Review Pending Report	Processing Complete	69607	2/22/2021 5:11:03 PM	2/22/2021 5:11:03 PM
File Pending Report	Processing Complete	69607	2/22/2021 5:11:27 PM	2/22/2021 5:11:27 PM

Page 1

<sup>9/29/2022</sup> Filed Campaign Treasurer's Report							Page 1
Randolph Bracy 69607 - STS 011			20201103-GEN 2021 TR (55)	From: 10/30/202 To: 2/1/2021	Amd: Y Wvr: ] Cmplt: COM		2/2/2021 12:00:40 A 2/22/2021 5:11:03 P
			Original Re	port		Submitted:	2/2/2021 12:00:40 A
Seq Date	EXPENDITURES Name	Address	Тур	Office e Purpose		Errors Amd	Amount
1	SB SOLIUTIONS CONSULTING		Х			5	\$100.00
						Submittad	2/2/2021 8:07:22 AM
	EXPENDITURES		Amended R	eport		Submuea:	2/2/2021 0.07.22 AVX
Seq Date	Name	Address	Typ	Office e Purpose		Errors Amd	Amount
1	EDUMATICS KNOWLEDGE SHOP	7649 W COLONIAL DR	MO			0	\$9,000.00
1/31/2021		ORLANDO FL	32818	EDUCATION RES	EARCH/CONSULTING	UPD	

# Filed Campaign Treasurer's Report

Randolph Bracy	Elect ID: 20201103-GEN	From: 10/30/202	Amd: Y Wvi	r: N Filed: FIL 2/2/2021 12:00:40 A
69607 - STS 011	Report: 2021 TR (55)	To: 2/1/2021	Cmplt: COM	Reviewed: AUD 2/22/2021 5:11:03 P
	Amended Re		Submitted: 2/22/2021 5:09:04 P	

	CONTRIBUTIONS							
Seq Date	Name	Address			Contributor Type	Occupation Inkind Description	Errors Amd	Amount
T	SUNTRUST	303 PEACHTREE	T ST		B	FINANCIAL INSTITUTION		Amount \$0.25
1	001111001				-		Ū	\$2.00
12/31/2020		ATLANTA	GA	38308	INT		ADD	
2	SUNTRUST	303 PEACHTREE	E ST		В	FINANCIAL INSTITUTION	0	\$0.21
1/29/2021		ATLANTA	GA	38308	INT		ADD	
3	SUNTRUST	303 PEACHTREE	E ST		В	FINANCIAL INSTITUTION	0	\$0.40
11/30/2020		ATLANTA	GA	38308	INT		ADD	
4	SUNTRUST	303 PEACHTREE	E ST		В	FINANCIAL INSTITUTION	0	\$0.32
10/30/2020		ATLANTA	GA	38308	INT		ADD	

#### **EXPENDITURES**

Seq						Office	Errors	
Date	Name	Address			Туре	Purpose	Amd	Amount
2	DJ IVORY ENT LLC	12575 NW 27TH AVE	E APT	# 203	MON		0	\$300.00
10/30/2020		MIAMI F	FL	33167		EVENT ENTERTAINMENT	ADD	
3	JEFFERSON	5987 LEE VISTA BLV	/D		MON		0	\$5,000.00
10/30/2020	KENDRA	ORLANDO F	FL	32822		GRAPHIC DESIGN	ADD	
4	BREAKFAST CLUB OF OCOEE	267 WEST RD, OCOE	EE, FL	, 34761	MON	· · · · · ·	0	\$27.46
11/4/2020		OCOEE F	FL	34761		FOOD & BEVERAGES	ADD	
5	4RIVERS SMOKEHOUSE	1047 S DILLARD ST,			MON		0	\$157.31
11/5/2020		WINTER GARDE F	FL	34787		FOOD & BEVERAGES	ADD	
6	HOLMES ENTERTAINMENT	1437 CAPE COVE BL	VD	•	MON		0	\$1,317.92
11/1/2020		ORLANDO F	FL	32808		VIDEOGRAPHY	ADD	
7	MCWHITE	8350 SANDBERRY B	LVD		MON		0	\$140.00
11/1/2020	SHARON	ORLANDO F	FL	32819		SPONSORSHIP	ADD	
8	PUBLIX	7524 DR. PHILLIPS B	LVD		MON		0	\$206.95
11/18/2020		ORLANDO F	FL	32819		EVENT SUPPLIES	ADD	
9	HOLMES ENTERTAINMENT	1437 CAPE COVE BL	VD		MON		0	\$1,250.00
11/20/2020		ORLANDO F	FL	32808		VIDEOGRAPHY	ADD	
10	STALNECKER	11 S WESTERN AVE			MON		0	\$5,000.00
11/27/2020	CHRISTIAN	NASHVILLE 1	ΓN	37210		MARKETING CONSULTING	ADD	

9/29/2022	Filed Campaign Trea	asurer's Repo	ort				Page 3
Randolph Bracy	Elect ID: 20201103-GEN	From: 10/30/202	Amd: Y	Wvr: N	Filed:	FIL	2/2/2021 12:00:40 A
69607 - STS 011	Report: 2021 TR (55)	To: 2/1/2021	Cmplt: COI	M R	eviewed:	AUD	2/22/2021 5:11:03 P

#### Amended Report

Submitted: 2/22/2021 5:09:04 P

#### **EXPENDITURES**

	LAFENDIIURES							
Seq						Office	Errors	
Date	Name	Address			Type	Purpose	Amd	Amount
11	KM CREATIVE WORKS LLC	5987 LEE VISTA E	BLVD		MON		0	\$10,000.00
11/3/2020		ORLANDO	FL	32822		SOCIAL MEDIA & MARKETING	ADD	
12	JEFFERSON	5987 LEE VISTA E	BLVD		MON		0	\$1,800.00
12/1/2020	KENDRA	ORLANDO	FL	32822		GRAPHIC DESIGN	ADD	
13	SB SOLUTIONS CONSULTING	PO BOX 5651			MON		0	\$1,093.20
12/1/2020		TALLAHASSEE	FL	32314		TREASURY & COMPLIANCE	ADD	
14	AVIS	3400 E SKY HARE	BOR BL	VD, PHOENIX, A	MON		0	\$143.76
1/25/2021		PHOENIX	AZ	85034		TRAVEL	ADD	
15	FROM THE HEART CHARITABLE F	1200 PREMIER DI	STE 2	60	DIS		0	\$9,000.00
12/1/2020		CHATTANOOGA	TN	37421		DISPOSITION OF FUNDS TO CHARITABLE ORGANIZATION	ADD	
16	A TOTAL CONSULTING GROUP	211 MAIN ST			MON		0	\$9,892.38
11/20/2020		WINDERMERE	FL	34786		MARKETING CONSULTING	ADD	

Submitted: 2/22/2021 5:11:27 P

	EXPENDITURES							
Seq						Office	Errors	
Date	Name	Address			Туре	Purpose	Amd	Amount
8	PUBLIX	7524 DR. PHILLIPS	S BLVD		MON		0	\$208.13
11/18/2020		ORLANDO	FL	32819		EVENT SUPPLIES	UPD	

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PAGE 1 OF 2 34/B36/0175/0 /31

10/30/2020

ACCOUNT STATEMENT

QUESTIONS? PLEASE CALL 1-800-786-8787

RANDOLPH BRACY OR SHELBY GREEN SENATE ACOUNT 5315 WOODSTEAD WAY ORLANDO FL 32819-3934

> KEEP YOUR SUNTRUST ACCOUNTS SAFER. USE UNIQUE USERNAMES AND PASSWORDS FOR YOUR ONLINE BANK ACCOUNTS. IT'S BEST NOT TO RECYCLE THE SAME USERNAME AND PASSWORD ON MULTIPLE WEBSITES WHERE YOU HAVE AN ONLINE PROFILE - ESPECIALLY YOUR FINANCIAL ACCOUNTS. ALSO, TRY TO AVOID CHARACTERS FROM YOUR EMAIL, PHONE NUMBER, BIRTHDATE OR OTHER PERSONAL INFORMATION.

	ACCOUN	T SUMMARY	
ACCOUNT TYPE	ACCOUNT NUM	IBER STATEMENT PERIOD	TAXPAYER ID
ADVANTAGE CHECKING		10/01/2020 - 10/30/2020	177-68-4044
DESCRIPTION	AMOUNT	DESCRIPTION	AMOUNT
BEGINNING BALANCE	\$28,458.10	AVERAGE BALANCE	\$39,511.81
DEPOSITS/CREDITS	\$29,650.32	AVERAGE COLLECTED BALANCE	\$38,706.81
CHECKS	\$3,945.00	NUMBER OF DAYS IN STATEMENT PERIOD	30
WITHDRAWALS/DEBITS	\$708.02	ANNUAL PERCENTAGE YIELD EARNED	.01%
ENDING BALANCE	\$53,455.40	INTEREST PAID YEAR TO DATE	\$1.38
	OVERDRA	AFT PROTECTION	
ACCOUNT NUMBER	PROTECTED B	BY	

NOT ENROLLED

FOR MORE INFORMATION ABOUT SUNTRUST'S OVERDRAFT SERVICES, VISIT WWW.SUNTRUST.COM/OVERDRAFT.

		DEPOSITS/CREDITS		
DATE	AMOUNT	DESCRIPTION	SR	BATCH
10/05	2,500.00	DEPOSIT	20	00028303909
10/06	4,000.00	DEPOSIT	20	00028165228
10/08	1,000.00	DEPOSIT	20	00028084003
10/09	500.00	DEPOSIT	20	00028183888
10/14	5,500.00	DEPOSIT	20	00029142290
10/19	1,000.00	DEPOSIT	20	00028101834
10/20	1,000.00	DEPOSIT	20	00031025639
10/22	500.00	DEPOSIT	20	00030034097
10/23	500.00	DEPOSIT	20	00031110953
10/26	4,500.00	DEPOSIT	20	00031101940
10/27	5,000.00		20	00030110187
10/29	2,150.00		20	00029032856
10/29		DEPOSIT	20	00030104688
10/30	1,000.00	DEPOSIT	20	00028065672
10/30	.32	INTEREST PAID THIS STATEMENT THRU 10/30		
DEPOSITS/	CREDITS: 15	TOTAL ITEMS DEPOSITED: 35		
		CHECKS		

			CUPCUS						
CHECK	AMOUNT DATE	SR	BATCH	CHECK	AMOUNT	DATE	SR	BATCH	
NUMBER	PAID			NUMBER		PAID			
334	970.00 10/26	20	76002797	415	425.00	10/28	20	77027131	
*385	1,250.00 10/15	20	75010158	416	300.00	10/29	20	74060471	
*414	1,000.00 10/26	20	74075241						

MEMBER FDIC

CONTINUED ON NEXT PAGE

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PAGE 2 OF 2 34/836/0175/0 /31

10/30/2020

ACCOUNT STATEMENT

		CHECKS					
ND LISTED	AS AN ELECT	CHECK NUMBER SEQUENCE. CHECK TRONIC/ACH TRANSACTION.	( MAY HAVE BEEN )	PROC	ESSED ELECTI	RONICAL	LY
		WITHDRAWALS	DEBITS				
AID		DESCRIPTION					BATCH
0/05	121.00	POINT OF SALE DEBIT USPS PO 1 9300	TR DA WINDERMERE	ATE FL	10/02 15059597	82	
0/09	58.67	CHECK CARD PURCHASE	TR DA	ATE	10/08	83	
0/13	55.21	CHECK CARD PURCHASE ROCCOS TACO AND TEQUIL	TR DA ORLANDO	ATE FL	10/08	83	
0/19	126.40	CHECK CARD PURCHASE MR & MRS CRAB JUICY SE	TR DA ORLANDO	ATE FL	10/16	83	
0/19	50.16	CHECK CARD PURCHASE MR & MRS CRAB JUICY SE	TR DA ORLANDO	ATE FL	10/16	83	
0/19	17.24	CHECK CARD PURCHASE BREAKFAST CLUB OF OCOE	TR DA	ATE FL	10/17	83	
0/19	22.58	CHECK CARD PURCHASE REDBOX *DIGITAL	TR D 866-733-2693	ATE WA	10/17	83	
0/22	62.00	CHECK CARD PURCHASE GRILLS LAKESIDE	TR DI ORLANDO	ATE FL	10/20	83	
0/22	12.17	CHECK CARD PURCHASE DNH*GODADDY.COM	TR Di 480→5058855	ATE AZ	10/21	83	
0/22	16.92	CHECK CARD PURCHASE BREAKFAST CLUB OF OCOE	TR DA	ATE FL	10/21	83	
0/23	15.97	CHECK CARD PURCHASE BREAKFAST CLUB OF OCOE	TR DI OCOEE	ATE FL	10/22	83	
0/26	20.00	POINT OF SALE DEBIT SHELL SERVICE	TR DA LAKE WORTH	ATE FL	10/25 94665601	82	
0/28	129.70	CHECK CARD PURCHASE ROCCOS TACO AND TEQUIL CHECK CARD PURCHASE MR & MRS CRAB JUICY SE CHECK CARD PURCHASE MR & MRS CRAB JUICY SE CHECK CARD PURCHASE BREAKFAST CLUB OF OCOE CHECK CARD PURCHASE GRILLS LAKESIDE CHECK CARD PURCHASE DNN*GODADY.COM CHECK CARD PURCHASE BREAKFAST CLUB OF OCOE CHECK CARD PURCHASE BREAKFAST CLUB OF OCOE BREAKFAST CLUB OF OCOE FOINT OF SALE DEBIT SHELL SERVICE CHECK CARD PURCHASE SEASONS 52 0074501	TR DA	ATE FL	10/26	83	

WITHDRAWALS/DEBITS: 13

		BALANCE ACTI	VITY HISTOR	Y		
DATE	BALANCE	COLLECTED	DATE	BALANCE	COLLECTED	
		BALANCE			BALANCE	
10/01	28,458.10	28,458.10	10/20	42,256.84	41,256.84	
10/05	30,837.10	28,837.10	10/21	42,256.84	42,256.84	
10/06	34,837.10	33,837.10	10/22	42,665.75	42,165.75	
10/07	34,837.10	34,837.10	10/23	43,149.78	42,649.78	
10/08	35,837.10	34,837.10	10/26	45,659.78	42,159.78	
10/09	36,278.43	35,778.43	10/27	50,659.78	48,659.78	
10/13	36,223.22	36,223.22	10/28	50,105.08	50,105.08	
10/14	41,723.22	36,723.22	10/29	52,455.08	49,805.08	
10/15	40,473.22	40,473.22	10/30	53,455.40	52,455.40	
10/19	41,256.84	40,256.84				

For more information, including details related to fees and balances, please sign on to Online Banking.

#### MEMBER FDIC

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RANDOLPH BRACY OR

SHELBY GREEN

SENATE ACOUNT 5315 WOODSTEAD WAY ORLANDO FL 32819-3934

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PAGE 1 OF 2

11/30/2020

ACCOUNT STATEMENT

QUESTIONS? PLEASE CALL 1-800-786-8787

KEEP YOUR SUNTRUST ACCOUNTS SAFER. USE UNIQUE USERNAMES AND PASSWORDS FOR YOUR ONLINE BANK ACCOUNTS. IT'S BEST NOT TO RECYCLE THE SAME USERNAME AND PASSWORD ON MULTIPLE WEBSITES WHERE YOU HAVE AN ONLINE PROFILE - ESPECIALLY YOUR FINANCIAL ACCOUNTS. ALSO, TRY TO AVOID CHARACTERS FROM YOUR EMAIL, PHONE NUMBER, BIRTHDATE OR OTHER PERSONAL INFORMATION.

ACCOUNT TYPE	ACCOUN ACCOUNT NUM	T SUMMARY BER STATEMENT PERIOD	TAXPAYER ID
ADVANTAGE CHECKING		10/31/2020 - 11/30/2020	177-68-4044
DESCRIPTION	AMOUNT	DESCRIPTION	AMOUNT
BEGINNING BALANCE	\$53,455.40	AVERAGE BALANCE	\$47,681.80
DEPOSITS/CREDITS	\$.40	AVERAGE COLLECTED BALANCE	\$47,617.28
CHECKS	\$12,014.00	NUMBER OF DAYS IN STATEMENT PERIOD	31
WITHDRAWALS/DEBITS	\$391.72	ANNUAL PERCENTAGE YIELD EARNED	.01%
ENDING BALANCE	\$41,050.08	INTEREST PAID YEAR TO DATE	\$1.78
	OVERDRA	FT PROTECTION	
ACCOUNT NUMBER	PROTECTED B	Y	
	NOT ENROLLE	D	

FOR MORE INFORMATION ABOUT SUNTRUST'S OVERDRAFT SERVICES, VISIT WWW.SUNTRUST.COM/OVERDRAFT.

DATE		SCRIPTION		DEPOSITS/CRED			SR BAT	сн	
11/30			ID TH	IIS STATEMENT	THRU 11/30		JA DAI	CII	
DEPOSITS/CRED	DITS: 1	TOTA	AL II	EMS DEPOSITE	D: 0				
				CHECKS					
CHECK	AMO	OUNT DATE	SR	BATCH	CHECK	AMOUNT	DATE	SR	BATCH
NUMBER		PAID			NUMBER		PAID		
336	624	1.00 11/16	20	75074634	*417	5,000.00	11/02	20	76027678
337	1,250	0.00 11/23	20	76134863	418	140.00	11/16	20	74125606
339	5,000	0.00 11/30	20	75156117					

\* INDICATES BREAK IN CHECK NUMBER SEQUENCE. CHECK MAY HAVE BEEN PROCESSED ELECTRONICALLY AND LISTED AS AN ELECTRONIC/ACH TRANSACTION.

DATE PAID	WITHDRAWALS/DEBITS AMOUNT DESCRIPTION	SR	ВАТСН						
11/04	27.46 CHECK CARD PURCHASE TR DATE 11/03 BREAKFAST CLUB OF OCOE OCOEE FL	83							
11/05	157.31 CHECK CARD PURCHASE TR DATE 11/04 4 RIVERS SMOKEHOUSE OF WINTER GARDENFL	83							

MEMBER FDIC

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PAGE 2 OF 2 34/B36/0175/0 /31 6 11/30/2020

ACCOUNT STATEMENT

		WITHDRAWA	LS/DEBITS			
DATE PAID	AMOUNT DESCRIP	TION			SR BATCH	
11/18	206.95 POINT O PUBLIX	F SALE DEBIT X SUPER MAR	ORLANE	TR DATE 11/18 O FL P0436111	82	
WITHDRAWA	LS/DEBITS: 3					
WITHDRAWA	LS/DEBITS: 3	BALANCE ACTI	VITY HISTORY			
WITHDRAWA  DATE	LS/DEBITS: 3BALANCE	BALANCE ACTI COLLECTED BALANCE	VITY HISTORY DATE	BALANCE	COLLECTED BALANCE	
		COLLECTED	DATE			
DATE	BALANCE	COLLECTED BALANCE	DATE 11/16	BALANCE	BALANCE	
DATE	BALANCE 53,455.40	COLLECTED BALANCE 52,455.40	DATE 11/16 11/18	BALANCE	BALANCE 47,506.63	

For more information, including details related to fees and balances, please sign on to Online Banking.

MEMBER FDIC

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PAGE 1 OF 2 34/B36/0175/0 /31

12/31/2020

ACCOUNT STATEMENT

RANDOLPH BRACY OR SHELBY GREEN SENATE ACOUNT 5315 WOODSTEAD WAY ORLANDO FL 32819-3934 QUESTIONS? PLEASE CALL 1-800-786-8787

EFFECTIVE DECEMBER 1, 2020, THE FOLLOWING CHANGES WILL BE MADE TO OUR FUNDS AVAILABILITY POLICY: WHEN A CASE-BY-CASE HOLD IS PLACED, THE FIRST \$225 OF YOUR DEPOSIT(S) WILL BE AVAILABLE NEXT DAY AND THE REMAINDER WILL BE AVAILABLE THE SECOND BUSINESS DAY AFTER THE DAY OF YOUR DEPOSIT. WHEN A LONGER DELAY IS PLACED ON YOUR DEPOSIT(S), THESE FUNDS WILL BE AVAILABLE NO LATER THAN THE 7TH BUSINESS DAY AFTER THE DAY OF YOUR DEPOSIT.

ADDITIONALLY, AS OF DECEMBER 1, 2020, CHANGES WILL BE MADE TO THE RULES AND REGULATIONS FOR DEPOSIT ACCOUNTS. THE CHANGES WILL BE REFLECTED IN THE 12/2020 VERSION. THE RULES AND REGULATIONS FOR DEPOSIT ACCOUNTS AND THE UPDATED FUNDS AVAILABILITY POLICY CAN BE VIEWED OR OBTAINED ONLINE AT WWW.SUNTRUST.COM/DISCLOSURES, BY REQUESTING A COPY AT 800.SUNTRUST, OR BY VISITING A SUNTRUST BRANCH.

	ACCOUN ACCOUNT NUM	T SUMMARY BER STATEMENT PERIOD	TAXPAYER ID
ACCOUNT TYPE	ACCOUNT NUM	BER SIRIEMENI PERIOD	INATAIER ID
ADVANTAGE CHECKING		12/01/2020 - 12/31/2020	177-68-4044
DESCRIPTION	AMOUNT	DESCRIPTION	AMOUNT
BEGINNING BALANCE	\$41,050.08	AVERAGE BALANCE	\$29,949.05
DEPOSITS/CREDITS	\$.25	AVERAGE COLLECTED BALANCE	\$29,949.05
CHECKS	\$12,893.20	NUMBER OF DAYS IN STATEMENT PERIOD	31
WITHDRAWALS/DEBITS	\$.00	ANNUAL PERCENTAGE YIELD EARNED	.01%
ENDING BALANCE	\$28,157.13	INTEREST PAID YEAR TO DATE	\$2.03

OVERDRAFT PROTECTION

PROTECTED BY NOT ENROLLED

FOR MORE INFORMATION ABOUT SUNTRUST'S OVERDRAFT SERVICES, VISIT WWW.SUNTRUST.COM/OVERDRAFT.

			 DE	POSITS/CREI	 DITS				
	AMOUNT DESCI	RIPTION				5	SR BAT	СН	
12/31	.25 INTER	REST PAI	D THI	S STATEMEN	r THRU 12/31				
DEPOSITS/CREDIT	'S: 1	TOTA	L ITE	MS DEPOSITI	ED: 0				
CHECK	AMOUN	DATE	SR	BATCH	CHECK	AMOUNT	DATE	SR	BATCH
NUMBER		PAID			NUMBER		PAID		
361	1,800.00	12/08	20	29134199	*419	10,000.00	12/03	20	74004510
*386	1,093.20	12/22	21	77080387					

CHECKS: 3

ACCOUNT NUMBER

\* INDICATES BREAK IN CHECK NUMBER SEQUENCE. CHECK MAY HAVE BEEN PROCESSED ELECTRONICALLY AND LISTED AS AN ELECTRONIC/ACH TRANSACTION.

BALANCE ACTIVITY HISTORY							
DATE	BALANCE	COLLECTED	DATE	BALANCE	COLLECTED		
		BALANCE			BALANCE		
12/01	41,050.08	41,050.08	12/03	31,050.08	31,050.08		
		MEMBER	FDIC	CONTINUED ON	NEXT PAGE		

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PAGE 2 OF 2 34/B36/0175/0 /31

12/31/2020

ACCOUNT STATEMENT

BALANCE ACTIVITY HISTORY								
DATE	BALANCE	COLLECTED	DATE	BALANCE	COLLECTED			
		BALANCE			BALANCE			
12/08	29,250.08	29,250.08	12/31	28,157.13	28,157.13			
12/22	28,156.88	28,156.88						

For more information, including details related to fees and balances, please sign on to Online Banking.

MEMBER FDIC

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PAGE 1 OF 2 34/B36/0175/0

01/29/2021

ACCOUNT STATEMENT

QUESTIONS? PLEASE CALL 1-800-786-8787

RANDOLPH BRACY OR SHELBY GREEN SENATE ACOUNT 1820 MERRIVALE LOOP OCOEE FL 34761-5215

USE UNIQUE USERNAMES AND PASSWORDS FOR YOUR ONLINE BANK ACCOUNTS. IT'S BEST NOT TO RECYCLE THE SAME USERNAME AND PASSWORD ON MULTIPLE WEBSITES WHERE YOU HAVE AN ONLINE PROFILE - ESPECIALLY YOUR FINANCIAL ACCOUNTS. ALSO, TRY TO AVOID CHARACTERS FROM YOUR EMAIL, PHONE NUMBER, BIRTHDATE OR OTHER PERSONAL INFORMATION. ------ACCOUNT SUMMARY ACCOUNT TYPE ACCOUNT NUMBER STATEMENT PERIOD TAXPAYER ID ADVANTAGE CHECKING 01/01/2021 - 01/29/2021 177-68-4044 \_\_\_\_\_ AMOUNTDESCRIPTIONAMOUNT\$28,157.13AVERAGE BALANCE\$26,471.55\$.21AVERAGE COLLECTED BALANCE\$26,471.55\$9,000.00NUMBER OF DAYS IN STATEMENT PERIOD29\$287.54ANNUAL PERCENTAGE YIELD EARNED.01%\$18,869.80INTEREST PAID YEAR TO DATE\$.21 DESCRIPTION DESCRIPTION BEGINNING BALANCE DEPOSITS/CREDITS CHECKS WITHDRAWALS/DEBITS ENDING BALANCE OVERDRAFT PROTECTION ACCOUNT NUMBER PROTECTED BY NOT ENROLLED FOR MORE INFORMATION ABOUT SUNTRUST'S OVERDRAFT SERVICES, VISIT WWW.SUNTRUST.COM/OVERDRAFT. DEPOSITS/CREDITS AMOUNT DESCRIPTION .21 INTEREST PAID THIS STATEMENT THRU 01/29 DATE SR BATCH 01/29 DEPOSITS/CREDITS: 1 TOTAL ITEMS DEPOSITED: 0 CHECKS AMOUNT DATE SR BATCH CHECK NUMBER PAID 342 9,000.00 01/25 20 75043234 CHECKS: 1 ------\_\_\_\_\_ WITHDRAWALS/DEBITS AMOUNT DESCRIPTION DATE SR BATCH PAID 143.78 CHECK CARD PURCHASETR DATE 01/07AVIS.COM PREPAY8003527900VA143.76 CHECK CARD PURCHASETR DATE 01/22AVIS.COM PREPAY8003527900VA 01/08 83

KEEP YOUR SUNTRUST ACCOUNTS SAFER.

WITHDRAWALS/DEBITS: 2

01/25

MEMBER FDIC

CONTINUED ON NEXT PAGE

83

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PAGE 2 OF 2 34/B36/0175/0 /31 1 01/29/2021

ACCOUNT STATEMENT

BALANCE ACTIVITY HISTORY									
DATE	BALANCE	COLLECTED	DATE	BALANCE	COLLECTED				
		BALANCE			BALANCE				
01/01	28,157.13	28,157.13	01/25	18,869.59	18,869.59				
01/08	28,013.35	28,013.35	01/29	18,869.80	18,869.80				

For more information, including details related to fees and balances, please sign on to Online Banking.

MEMBER FDIC

PAGE 1 OF 2 34/B36/0175/0 /31

02/26/2021

ACCOUNT STATEMENT

QUESTIONS? PLEASE CALL 1-800-786-8787

RANDOLPH BRACY OR SHELBY GREEN SENATE ACOUNT 1820 MERRIVALE LOOP OCOEE FL 34761-5215

ACCOUNT NUMBER

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KEEP YOUR SUNTRUST ACCOUNTS SAFER. USE UNIQUE USERNAMES AND FASSWORDS FOR YOUR ONLINE BANK ACCOUNTS. IT'S BEST NOT TO RECYCLE THE SAME USERNAME AND PASSWORD ON MULTIPLE WEBSITES WHERE YOU HAVE AN ONLINE PROFILE - ESPECIALLY YOUR FINANCIAL ACCOUNTS. ALSO, TRY TO AVOID CHARACTERS FROM YOUR EMAIL, PHONE NUMBER, BIRTHDATE

OR OTHER PERSONAL INFORMATION.

	ACCOUN	NT SUMMARY	
ACCOUNT TYPE	ACCOUNT NUM	ABER STATEMENT PERIOD	TAXPAYER ID
ADVANTAGE CHECKING ***CLOSED***		01/30/2021 - 02/26/2021	177-68-4044
DESCRIPTION	AMOUNT	DESCRIPTION	AMOUNT
BEGINNING BALANCE	\$18,869.80	AVERAGE BALANCE	\$2,755.39
DEPOSITS/CREDITS	\$22.58	AVERAGE COLLECTED BALANCE	\$2,755.39
CHECKS	\$18,892.38	NUMBER OF DAYS IN STATEMENT PERIOD	28
WITHDRAWALS/DEBITS	\$.00	ANNUAL PERCENTAGE YIELD EARNED	.00%
ENDING BALANCE	\$.00	INTEREST PAID YEAR TO DATE	\$.21

PROTECTED BY
NOT ENROLLED

FOR MORE INFORMATION ABOUT SUNTRUST'S OVERDRAFT SERVICES, VISIT WWW.SUNTRUST.COM/OVERDRAFT.

DATE AMOUNT DESCRI 02/08 22.58 DEPOSI	PTION	EPOSITS/CREDITS		2	SR BATO 20 0003	СН		
DEPOSITS/CREDITS: 1								
CHECK AMOUNT NUMBER	DATE SR PAID 02/01 21	CHECKS BATCH 75072354	CHECK NUMBER 344	amount 9,892.38	DATE PAID 02/05	SR 20	BATCH	
OVERDRAFT & RETURNED ITEM FE								
				TOTAL FOR YEAR-				
TOTAL OVERDRAFT FEES			\$0.00		\$0.00			
TOTAL RETURNED ITEM FEES			\$0.00		\$0.00			
TOTAL OVERDRAFT AND RETURNED	ITEM FEE	WAIVERS \$	36.00		\$36.00			

MEMBER FDIC

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PAGE 2 OF 2 34/B36/0175/0 /31

02/26/2021

ACCOUNT STATEMENT

BALANCE ACTIVITY HISTORY									
DATE	BALANCE	COLLECTED	DATE	BALANCE	COLLECTED				
		BALANCE			BALANCE				
01/30	18,869.80	18,869.80	02/08	.00	.00				
02/01	9,869.80	9,869.80	02/26	.00	.00				
02/05	-22.58	-22.58							

For more information, including details related to fees and balances, please sign on to Online Banking.

MEMBER FDIC

STSC SUBPOENA SERVICES FL-ORLANDO-7136 , COPY REFERENCE: 20210409000092 CX 04/13/21 14:23:29 30 WEB JOBT10413141708 0076027678 20201102 07 5000.00 000000

9 DELUCT GATURA COMICYACINA	RANDOLPH BRACY SENATE ACCOUNT PAY TO Kendra The order of Fine Hous and SUNTRUST ACHART DESTOOOT	Jefferson J	63-215/631 10 30/202 DATE 5 100 5 100 5 100 5 100 100 1	417 5,000-
A TEATRACHELL REPORT OF CONTRACTS LET CO		Fairwinds 26318 10/30/2020 16:12:30 CSYFRETT TMID 537030420	91368 958347	C ENDORSE HERE C ENDORSE HERE C ENDORISE AFTEN MOSILE OR REMOTE DEVOSIT C ENTL C E

STSC SUBPOENA SERVICES FL-ORLANDO-7136 COPY REFERENCE: 20210409000092 CX 04/13/21 14:23:29 31 WEB JOBT10413141708 0074125606 20201116 07 140.00 00000 63-215/631 418 **RANDOLPH BRACY** SENATE ACCOUNT DATE \$ O DELUXÉ, deluxe.com/checks PAY TO the order of <u>DOLLARS</u> 6 . Security Included 10 10 **SUNTRUST** ACH RT 061000104 <u>MEMO</u> MP FOREVER FT ¥. DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE RESERVED FOR FINANCIAL INSTITUTION USE \* \* FEDERAL RESERVE BOARD OF GOVERNOR Security Screwn Chemically Sensitive Paper MicroPret Line 10.0 Security Features: Padook dakigo is a contensing ENDORSE HERE CHECK HERE AFTER MOBILE OR REMOTE DEPOSIT The security features listed below, as well as those not listed, exceed industry guidelines. DATE. Results of document alteration: - MP Small type in line appears verbiage on CROPH as defied line when photo: Absei Destamout S REG. CC 5 3a STSC SUBPOENA SERVICES FL-ORLANDO-7136 , COPY REFERENCE: 20210409000092 CX 04/13/21 14:23:29 32 WEB JOBT10413141708 0075074634 20201116 07 624.00 000000

	RANDOLPH BRACY	63-215/631	336
פ נגווען מון זיין נמשקאנך:	SENATE ACCOUNT <u>PAYTO</u> Holmes Enterta <u>Incorder of</u> <u>Six hundred twenty-</u> <u>Six hundred twenty-</u> <u>SUNTRUST</u> ACH HT OB10001DA <u>MEMIO</u> Media Services 7		624

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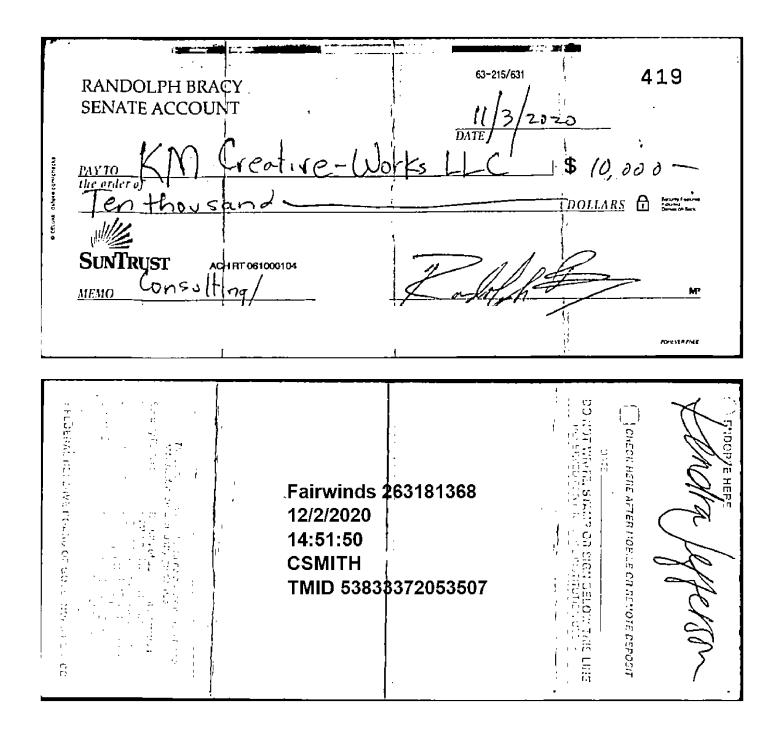
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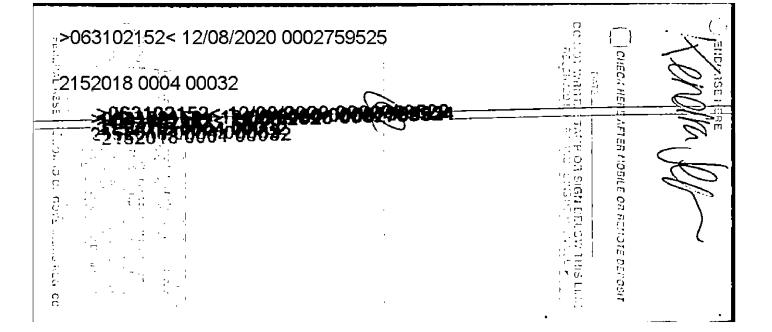
68-216/631 339 RANDOLPH BRACY SENATE ACCOUNT DATE \$ <u>PAYTO</u> the order<u>o</u> ⋳ DOLLARS o delutive SUNTRUST ACH 87,081000104 DNS МЕМО FOREVER FREE × Security Features: DON FEDERAL RESERVE BOARD OF GOVERNORS REG. Ascend FCU ENDORSE HERE CHECK HERE AFTER MOBILE OF The secur not listed. 264181626 RH 0 X 11/28/2020 5.51 PM m Results of document Absence of industry guidelines. Ę oso no aliangio ipfiled how Sinall tribe listed below, as well ER #N/A LOC #0 Ê OF SDC  $\bar{c}$ SEQ #4 σ REMOTE DEPOSIC OW THIS LINE ON USE \* of fords re-. ဝျ

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63-215/631 361**RANDOLPH BRACY** SENATE ACCOUNT 0 20 DATE P(Son a teude devue comchecks \$ 1800 PAYTO the order of DOLLARS 🔂 🚟 v∩€ **SUNTRUST** ACH RT 081000104 onss <u>ме</u>мо FOR VIATING



STSC SUBPOENA SERVICES FL-ORLANDO-7136 COPY REFERENCE: 20210409000092 CX 04/13/21 14:23:29 37 WEB JOBT10413141708 0077080387 20201222 07 1093.20 00000 Sec. 63-215/631 386 RANDOLPH BRACY SENATE ACCOUNT 020 e beluite deluxe com/checks \$ 3. <u>PAY TO</u> 1,0 2 Ð the order Security Features Incuded. Decails on Back. DOLLARS  $\psi^{\mu}$ SUNTRUST ACH RT 061000104 <u>MEMO</u> MP \* FEDELIAE REDUCES - E ų į SENDORSE HERE NUL MARKE CHECK HERE AFTER MOBILE OR REMOTE DEPOSIT 2 DATE 5 Ξ 24 ພາສາຊິມ ກອນຮູບກາດ 1 ປຸ やいいが ~ 00-004 180284400 40 04710 0.00 i, 1.1.1.1.1 : . ÷ 1.00 ę 3 ~) };  $\gamma_{1}\gamma_{2}$ ļ 4 .-):: ^( ·. · •... 2.51

Exhibit 7 Page 18 of 23

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## SunTrust Bank

### Deposit

Transaction Date / Time: Processing Date: Cashbox Number: Cost Center: Transaction ID: 10/30/2020/14:19 10/30/2020 0007 6097800 144

Account Number: Account Type:

Checking/Savings/Money Market

Session Funds In: Cash In: Check In: Session Funds Out: Total Deposit Amt:

\$0.00 \$0.00 \$1,000.00 \$0.00 \$1,000.00

>063102152< 10/30/2020 004803165

6097800 0007 00144

STSC SUBPOENA SERVICES FL-ORLANDO-7136 , COPY REFERENCE: 20210409000093 CX 04/13/21 14:23:29 40 WEB JOBT10413141708 0028065672+ 20201030 07 1000.00 00000

81-275/829 ALLIANCE OF FLORIDA SENIORS POLITICAL CO 606 E MADISON ST.	1504
TAMPA, FL 33602 DATE $\frac{9}{34}$	2020
	DLLARS ← Heat Ink
Www my100bank.com	B
MEMO	

>063102152< 10/30/2020 0004803164 6097800 0007 00144 >063102152< 10/30/2020 00048031 6097800 0007 00144	



Green FEC Cases StatementS Green to: fec 10/05/2022 06:51 AM Cc: "Stephanie Cunningham" From: "S Green" <sbsllc2017@gmail.com> To: fec@myfloridalegal.com Cc: "Stephanie Cunningham" <Stephanie.Cunningham@myfloridalegal.com> History: This message has been replied to and forwarded.

1 Attachment



FECCases StatementSigned.pdf

Hi,

Please see my statement attached.

Thank you. Shelby Green October 5 2022

Florida Ethics Commission Po Drawer 15709 Tallahassee, FL 32317

Subject: FEC Cases Statement

Dear Stephanie Cunningham,

Please allow this statement to serve as a formal explanation of the circumstances that have contributed to the multiple FEC cases that I would like to settle. I would first like to acknowledge that I have submitted reports late and subsequently amended reports with large amounts of activity. While this was never my initial intention, factors such as: lack of thorough Chapter 106 Statute knowledge , lack of consistent and continued help with reports, the unawareness of financial activity until the last minute, the unawareness of a high volume of activity until the last minute, and the lack of the preparation for the quickened reporting dates all contribute to my errors.

For the past two election cycles, I have worked as an independent contractor in the role of the Treasurer on many campaigns and political committees. I began this process by learning the EFS system and gathering information from candidates and committees to file reports. While I had some knowledge of the election statutes, not only was I not well-versed at the time, but I would only reference the statutes as needed. Therefore, I subverted my own treasury and compliance efforts in not knowing and always implementing statutes like the 2-day recordkeeping requirement of expenses and being prepared for the quickening of the reporting periods. During my first election cycle as a Treasurer, I did not initially have help in preparing the reports but learned that in order to file the weekly and bi-weekly reports on time and with accuracy, I would need assistance, so I was able to get help during my second cycle, but it was not constant and eventually tapered off when I needed it the most. Ultimately, the person that was assisting me was no longer available to me during the pre-election weekly reporting and in preparing the termination reports-when I needed the most assistance.

Two of the largest factors that led to my late reporting and subsequent amendments were not readily knowing the reporting period dates and not always having knowledge of the activity that had occurred-which in retrospect was probably my largest mistake. In any one instance where I would receive a large batch of check images, at the last minute, from the campaign that had been written to canvassers or campaign staff and not yet cashed or even contributions that were received but not yet deposited by reporting time, it would prevent me from preparing other reports and in turn make my other reports late. Yes, I learned quickly that operating blindly was not sustainable and definitely did not allow for accuracy or timeliness and did not agree with Chapter 106.

While I have explained the compounding reasons that have led to my multiple cases with the FEC, and have learned that these lessons come at a high price, I greatly appreciate your consideration in the resolution and settlement of these cases.

ſ Shelby Green

### FLORIDA ELECTIONS COMMISSION PHONE LOG Case No.: FEC 21-246

**Respondent:** Shelby Green **Complainant:** Division of Elections

- Date and time: 07/13/21 @ 10:47 a.m.
   Name: Respondent
   Phone #: 850-590-3612
   Summary: See note at the end of the Phone Log.
   Entered by: MBW
- Date and time: 07/20/21 @ 10:32 a.m.
   Name: Respondent
   Phone #: 850-590-3612
   Summary: I called Respondent to clarify information she had given in the previous telephone interview.

Respondent previously stated that if she had any questions about completing the CTRs she would check the Treasurer Handbook. I asked if she possessed a copy of the Handbook. She stated she did not have a printed copy of the Handbook; she explained that she would check the online copy at the DOE website. **Entered by:** MBW

3. **Date and time:** 11/28/22 @ 3:58 p.m. **Name:** Respondent **Phone #:** 850-590-3612

**Summary:** I called to get an update on the information I received during the initial interview on July 13, 2021. I asked her to explain her understanding of reporting campaign activities before the investigation and what is her understanding now. She stated that it was her understanding that if she did not file the report by the due date then she would be assessed a fine. However, she thought that it was okay to file an amended report to add information as long as the original report was filed on time. She stated that she did not realize that there was anything wrong with amending the campaign reports until she started getting the letters about the investigation.

I asked her to explain why there was a large amount of activity reported after the due date. She explained that she wanted to be transparent, so she reported the information that was available and added the rest later. I asked her to explain. She stated that the candidate or PCs usually collected the contributions and wrote the expenditure checks and sent her the information to file the reports. She stated that sometimes she did not have access to bank records, especially for the candidates from south Florida because she lives in Tallahassee so the candidates would have a campaign worker to compile a spreadsheet and send her the spreadsheet. She stated that there were occasions when the spreadsheets did not contain all the information required on the campaign report; therefore, she just reported the information that was available to her.

I asked her had any information regarding her political history changed, i.e., had she run for office, had she read the Handbook or Chapter 106. She stated that she had not run for public office. She stated that she had never run for public office. She explained that the Shelby Green that ran for City Commission was not her. She stated that since the last interview she has read Chapter 106, Florida Statutes. She added, "it's a lot of stuff in there." She stated she has also read the Handbook. She stated that she has the 2018 Handbook. I gave her directions to download the 2022 Handbook from the DOE website.

She stated that she has made other corrective measures to try to stay on top of things. She has hired an assistant to help her input the information. She requests that the candidates and PCs use Truist as their depository so she can monitor the account activity electronically. She requires access to the campaign account so she can have access to the information before the day before it is due.

Memo to File? No Entered by: MBW

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### **RESPONDENT INTERVIEW MEMO – Call details for entry #1**

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- I asked if she was aware that all the information regarding the financial activity in a reporting period should be on the original report. She answered affirmatively and added that it was her understanding that if the report was late the campaign would be assessed a fine, but it was okay to amend the report if the report was timely filed. She stated that she inputted as much information as possible before filing the original report and she would file an amended to report the information that was not recorded on the original. She reiterated that she was overwhelmed.
- I asked if she had access to the bank accounts for the campaigns. She answered negatively. She stated that in many cases she was not a signatory on the account. She explained that usually the candidate handled the deposits and expenditures and sent the information to her to be reported. She stated that sometimes that would send it periodically and sometimes they would wait until the end of the reporting period, when it was time to file the report.
- I asked, if she considered resigning from some of the candidates' campaigns, since she felt "overwhelmed." *She stated that she thought about it but she didn't want to just leave the candidates in a bad situation with no one to help with the campaign*. I asked if she thought she was currently in a bad situation. *She answered affirmatively*. I asked if she had discussed her situation with any of the candidates. *She answered, negatively. She stated she did know what the procedure was or what she needed to do; therefore, she has not spoken with anyone about her current situation.*
- I asked what corrective measures she took once she received the letters from the FEC. She stated that by the time she received the letters most of the campaigns were raping up; therefore, she thought she could handle it but it was just as hectic during the TR period;

therefore, she ended up in the same situation, which generated even more letters from the *FEC*.

- Have you ever run for public office? If so, please name each office you ran for and state what year each election occurred. *No*
- Have you ever been appointed to act as a campaign treasurer for a candidate? If so, please name each such candidate, the office each ran for, and state what year each election occurred. She stated that she has been appoint as treasurer before. She did not give the candidates' names. She stated that she previously worked with the Democratic party and agreed to help with the campaigns of a couple of the Democratic candidates.
- Have you ever held the office of chairperson, treasurer, or other similar position for a political committee or electioneering communications organization? If so, please name each committee, state the office you held for each, and state when you held each office. *Yes. Treasurer.*
- Have you ever prepared or signed a campaign treasurer's report? If so, please state the name of the candidate or committee whose report you prepared or signed. *Yes. Various Democratic candidates.*
- What action have you taken to determine your responsibilities under Florida's election laws? *She stated that she checked the treasurer handbook and called the DOE if she had any questions.*
- Do you possess a copy of Chapter 106, Florida Statutes? If so, when did you first obtain it? Have you read it? *No*
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- Did you receive any other materials from your filing officer? If so, please describe them. No
- Do you have anything else to add for the Commission's consideration regarding the charges specified in the letter of legal sufficiency in this case? *She stated that she was hoping she could settle all the cases*. I informed her that I would inform the attorney assigned to the case and the attorney will get back with her. I explained that FEC 19-439 may not be included in the settlement agreements that Ms. Clay will discuss with her. I explained the settlement process and the investigative process. I informed her that I will attempt to meet with Ms. Clay regarding her cases next week and someone would reach out to her by phone. I confirmed that 850-590-3612 was the number to reach her.

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While I have explained the compounding reasons that have led to my multiple cases with the FEC, and have learned that these lessons come at a high price, I greatly appreciate your consideration in the resolution and settlement of these cases.





### **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



December 13, 2021

Shelby Green, Treasurer Campaign of Randolph Bracy 1842 Ashley Hall Way Tallahassee, FL 32308-4976

### RE: Case No.: FEC 21-246; Respondent: Shelby Green

Dear Ms. Green:

On March 15, 2021, the Florida Elections Commission received a complaint alleging that you violated Florida's election laws. I have reviewed the complaint and find that it contains one or more **legally sufficient allegations**. The Commission staff will investigate the following alleged violations:

Section 106.07(5), Florida Statutes: Respondent, in her capacity as treasurer for Randolph Bracy, a 2020 candidate for State Senator, District 11, may have certified the campaign's 2021 TR report was true, correct, and complete when it was not, as alleged in the complaint.

Section 106.19(1)(c), Florida Statutes: Respondent, in her capacity as treasurer for Randolph Bracy, a 2020 candidate for State Senator, District 11, may have falsely reported or deliberately failed to include information in the campaign's 2021 TR report required by Chapter 106, Florida Statutes, as alleged in the complaint.

When we conclude the investigation, a copy of the Report of Investigation (ROI) will be mailed to you at the above address. Based on the results of the investigation, a staff attorney will prepare and present a written Staff Recommendation (SR) to the Commission as to whether there is probable cause to charge you, the Respondent, with violating Chapters 104 or 106, Florida Statutes. You will have an opportunity to respond to both the ROI and the SR. The Commission will then hold one or more hearings to determine whether the alleged violations occurred and, if so, the amount of the fine to be imposed upon you. Notice will be mailed to you and the Complainant at least 14 days before any hearing at which your case is to be considered.

Pursuant to Section 106.25(4)(i)3., Florida Statutes, the Commission may enter into a consent agreement with a Respondent to settle a complaint prior to a finding of probable cause. If you are interested in entering negotiations directed towards reaching a consent agreement to resolve this matter, please contact the Commission and request to speak with the attorney assigned to this case.

Shelby Green December 13, 2021 Page 2 FEC 21-246

# 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 <u>confidential</u> until the Commission finds probable cause or no probable cause, unless the Respondent files a written waiver of confidentiality with the Commission. The confidentiality provision does not apply to the Complainant or the Respondent.

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

For additional information, please refer to the "Frequently Asked Questions" section of the Commission's website.

If you have additional questions, please contact **Margie Wade**, the investigator assigned to this case, by phone at (850) 922-4539 or by email at Margie.Wade@myfloridalegal.com.

Sincerely, Teccaro Vaccaro

Executive Director

TV/mw

### DIVISION OF ELECTIONS FEC NOTICE FORM

To FEC from Division of Elections

Candidate:	Randolph Bracy			
Account Number:	69607			
Treasurer:	Shelby Green			

The Division of Elections hereby provides this notice to the Florida Elections Commission pursuant to sections 106.22(7) and 106.25, Florida Statutes. Apparent violations of Chapter 106, F.S., have occurred based upon a review of campaign treasurer's reports which reflect that the report listed below was filed in violation of sections 106.07(5) and 106.19(1)(c), Florida Statutes. In addition, the treasurer failed to keep detailed accounts, current within not more than 2 days after the date of receiving a contribution or making an expenditure made by or on behalf of the candidate in violation of section 106.06(1), Florida Statutes.

2021 TR

- Randolph Bracy (69607) was a 2020 candidate for the office of State Senator.
- On November 14, 2017, Senator Bracy filed the Appointment of Campaign Treasurer and Designation of Campaign Depository with the Division appointing Shelby Green as treasurer.
- The 2021 TR campaign treasurer's report was due on February 1, 2021. On February 2, 2021, Ms. Green filed the report showing expenditures in the amount of \$9,000. On February 22, 2021, Ms. Green amended the report adding \$45,330.16 in expenditures.

**Sent By:** Kristi Reid Willis **Date:** March 11, 2021

eal

### FLORIDA DEPARTMENT OF STATE, DIVISION OF ELECTIONS CAMPAIGN TREASURER'S REPORT SUMMARY

(1)	Randolph Bracy		(	(2)	69607			
	Candidate, Committe or Party Name				I.D. Number			
(3)	1820 Merrivale Loop		Ocoee			FL	34761	
i.	Address (number and street)		City			State	Zip Code	
	Check box if address has changed sir	ice last report						
(4)	Check appropriate box(es):							
	X Candidate (office sought):							
	Political Committee				has DISBAN			
	Committee of Continuous Existance Party Executive Committee			If CC	E has DISBA	NDED		
				S		_		
Cov	er Period: From 10/30/2020	To 02/	01/2021		Report	Туре:	TR	
	Original X Amendment	Spe	ecial Election R	eport				
	(6) CONTRIBUTIONS THIS REPORT			(	7) EXPENDI	TURES TI	HIS REPOR	Т
Cash	& Checks	\$1.18	Monetary E	Exper	nditures			\$54,330.16
Loans	5	\$0.00	Transfers t	o Off	ice Account			\$0.00
Та	tal Monetary	\$1.18	Total	l Mon	etary			\$54,330.16
In-Kin	d	\$0.00	(8) Other D	Distrib	outions			
		Ce	rtification					
	It is a first degree misd	emeanor for any p	erson to falsify	a pub	olic record (ss	.839.13, F	F.S.)	
	ertify that I have examined this report and it e, correct and complete	is	I certify tha true, correc		ive examined d complete	this repo	rt and it is	
				<u></u>				
Nan	ne of 🔄 Treasurer 🔄 Deputy	Treasurer	Name of	스	Candidate	ЦС	Chaiman (PC	
			v					
	naturo		<u>×</u> Signature				<u> </u>	
Sig	nature							

#### CAMPAIGN TREASURER'S REPORT – ITEMIZED EXPENDITURES

	** R(	ecords in Fil	ed Report **	
Seq #	Full Name			Amount
Date	(Last, Suffix, First, Middle Street Address & City, State, Zip	Туре	Purpose	Amend
	EDUMATICS KNOWLEDGE SHOP			\$9,000.0
	7649 W COLONIAL DR	MON	EDUCATION RESEARCH/CONSULTING	
	ORLANDO, FL 32818 BB SOLIUTIONS CONSULTING			UPD
°	SB SOLID HONS CONSULTING	X		\$100.0
11/01/2020 ,				History 02/02/21
	DJ IVORY ENT LLC 12575 NW 27TH AVE APT # 203	MON	EVENT ENTERTAINMENT	\$300.0
	MIAMI, FL 33167			ADD
	JEFFERSON KENDRA	MON	GRAPHIC DESIGN	\$5,000.0
	5987 LEE VISTA BLVD DRLANDO, FL 32822			ADD
	BREAKFAST CLUB OF OCOEE			\$27.4
2	267 WEST RD, OCOEE, FL 34761	MON	FOOD & BEVERAGES	
				ADD
	4RIVERS SMOKEHOUSE 1047 S DILLARD ST.	MON	FOOD & BEVERAGES	\$157.3
	MINTER GARDEN, FL 34787			ADD
		MON	VIDEOGRAPHY	\$1,317.9
	1437 CAPE COVE BLVD DRLANDO, FL 32808			ADD
7 N	MCWHITE SHARON		SPONSORSHIP	\$140.0
		MON	aronaokanir	ADD
	DRLANDO, FL 32819 PUBLIX			\$208.1
	7524 DR. PHILLIPS BLVD	MON	EVENT SUPPLIES	
	ORLANDO, FL 32819			UPD
· ·	PUBLIX 7524 DR. PHILLIPS BLVD	MON	EVENT SUPPLIES	\$206.9
11/18/2020	ORLANDO, FL 32819			ADD History 02/22/2
	HOLMES ENTERTAINMENT	MON	VIDEOGRAPHY	\$1,250.0
	DRLANDO, FL 32808			ADD
	STALNECKER CHRISTIAN	MON	MARKETING CONSULTING	\$5,000.0
	11 S WESTERN AVE VASHVILLE, TN 37210	WON		ADD
	KM CREATIVE WORKS LLC			\$10,000.0
e	5987 LEE VISTA BLVD	MON	SOCIAL MEDIA & MARKETING	
	ORLANDO, FL 32822			ADD
	JEFFERSON KENDRA 5987 LEE VISTA BLVD	MON	GRAPHIC DESIGN	\$1,800.0
	ORLANDO, FL 32822	_		ADD
	SB SOLUTIONS CONSULTING PO BOX 5651	MON	TREASURY & COMPLIANCE	\$1,093.2
	TALLAHASSEE, FL 32314			ADD
-	AVIS	MON	TRAVEL	\$143.7
a	3400 E SKY HARBOR BLVD, PHOENIX, AZ, 85034 PHOENIX, AZ 85034	MON		ADD
	FROM THE HEART CHARITABLE FUND		·······	\$9,000.0
1	1200 PREMIER DR STE 260	DIS	DISPOSITION OF FUNDS TO CHARITABLE ORGANIZATION	
				ADD 60 802 2
	A TOTAL CONSULTING GROUP 211 MAIN ST	MON	MARKETING CONSULTING	\$9,892.3
	MNDERMERE, FL 34786	1	1	ADD