

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**In Re: Richard J. Venerable**

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**Case No.: FEC 15-344**

**TO:** Richard J. Venerable  
255 Bry-Lynn Drive  
West Melbourne, FL 32904

Sue Frank, City Clerk  
2240 Minton Road  
West Melbourne, FL 32904

**NOTICE OF HEARING (INFORMAL HEARING)**

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

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

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

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

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

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

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

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

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

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

*Amy McKeever Toman*  
Executive Director  
Florida Elections Commission  
February 2, 2016

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

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

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

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

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

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

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

FILED

15 DEC -4 AM 11:40

STATE OF FLORIDA  
ELECTIONS COMMISSION

STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION

Florida Elections Commission,  
Petitioner,

Case No.: FEC 15-344

v.

Richard J. Venerable,  
Respondent.

ORDER OF PROBABLE CAUSE

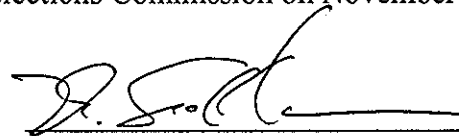
**THIS MATTER** was heard by the Florida Elections Commission (Commission) at its regularly scheduled meeting on November 17, 2015, in Tallahassee, Florida.

Based on the Complaint, Report of Investigation, Staff's Recommendation, and oral statements made at the probable cause hearing, the Commission finds that there is **probable cause** to charge Respondent with the following violation:

Count 1

On or about April 10, 2015, Respondent violated Section 106 07(7), Florida Statutes, when he failed to notify the filing officer on the prescribed reporting date that no report would be filed on that date because he had not received funds, made contributions, or expended reportable funds during the 2015 M3 Report.

**DONE AND ORDERED** by the Florida Elections Commission on November 17, 2015.

  
\_\_\_\_\_  
M. Scott Thomas, Chairman  
Florida Elections Commission

Copies furnished to:

Jaakan A. Williams, Assistant General Counsel

Richard J. Venerable, Respondent

Sue Frank, Complainant

## NOTICE OF RIGHT TO A HEARING

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

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

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

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

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

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**In Re: Richard J. Venerable**

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**Case No.: FEC 15-344**

**TO:** Richard J. Venerable  
255 Bry-Lynn Drive  
West Melbourne, FL 32904

Sue Frank, City Clerk  
2240 Minton Road  
West Melbourne, FL 32904

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

A hearing will be held in this case before the Florida Elections Commission on, **November 17, 2015 at 10:30 AM, or as soon thereafter as the parties can be heard**, at the following location: **Department of Business and Professional Regulation, 1940 North Monroe Street, Tallahassee, FL 32399.**

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

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

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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: Richard J. Venerable /

Case No.: **FEC 15-344**

**STAFF RECOMMENDATION FOLLOWING INVESTIGATION**

Pursuant to section 106.25(4)(c), Florida Statutes, undersigned staff counsel files this written recommendation for disposition of the referral in this case recommending that there is **probable cause** to charge Respondent with violating **Section 106.07(7), Florida Statutes**. Based upon a thorough review of the Report of Investigation submitted on August 3, 2015, the following facts and law support this staff recommendation:

1. On May 13, 2015, the Florida Elections Commission (“Commission”) received a sworn complaint from Sue Frank (“Complainant”), alleging that Richard J. Venerable (“Respondent”) violated Chapter 106, Florida Statutes.

2. Respondent is a candidate for the office of Mayor for the City of West Melbourne. (ROI Exhibit 1)<sup>1</sup>

3. Complainant alleged that Respondent failed to notify his filing officer in writing that no report would be filed on the applicable reporting date for the following report: 2015 M3 Report.

4. By letter dated July 21, 2015, the Executive Director notified Respondent that Commission staff would investigate the following statutory provision:

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

- 2015 M3 (March 2-March 31)

5. Respondent filed his State of Florida Appointment of Campaign Treasurer and Designation of Campaign Depository for Candidates form (“DS-DE 9”), on March 2, 2015, and appointed Tracy Venerable as deputy treasurer. (ROI Exhibit 1)

6. On March 2, 2015, Respondent signed and dated the “2016 Announced Candidate Information Checklist” indicating that he had received a copy of Chapter 106, Florida Statutes,

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<sup>1</sup> The Report of Investigation is referred to herein as “ROI ”

the *Candidate and Campaign Treasurer Handbook*, and the Reporting Dates for Campaign Treasurer Reports, etc. (ROI Exhibit 2)

7. The *2013 Candidate and Campaign Treasurer Handbook* explained the requirement of filing a waiver-of-report when the candidate has no financial activity to disclose. (ROI Exhibit 3, pages 4 and 6)

8. The *Candidate EFS User's Guide* explained the process for filing a waiver-of-report using the electronic filing system (EFS). Listed on page 13 are specific instructions about checking the box next to "waiver" when there is no financial activity to disclose. (ROI Exhibit 4, pages 4, 5, and 6)

**Alleged Violation: Section 106.07(7), Florida Statutes**

9. In pertinent part, Section 106.07(7), Florida Statutes, state:

[A]ny candidate or political committee not reporting by virtue of this subsection on dates prescribed elsewhere in this chapter **shall notify the filing officer in writing on the prescribed reporting date that no report is being filed on that date.** (emphasis added)

10. The table below reflects Respondent's untimely written notifications to the Division:

Report	Report Cover Period	Date Notification Due	Date Notification Filed	No. of Days Late
2015 M3	3/1/15 – 3/31/15	4/10/15	6/25/15	76

11. Respondent failed to provide a written response to the referral. (See ROI, paragraph 9) However, during a July 27, 2015 phone interview with Commission staff, Respondent stated that he was a first-time candidate that "screwed up by relying on someone else to do my reporting...I should've been going behind him but I was working out of state and I was rarely home." (See Attachment "A," Phone log, entry # 5)

12. Despite having access to read and review Chapter 106, Florida Statutes, the *2013 Candidate and Campaign Treasurer Handbook*, and the *EFS Guide Book*, Respondent failed to timely notify the filing officer on the prescribed reporting date that no report would be filed for the 2015 M3 Report (ROI Exhibit 5)

13. "Probable Cause" is defined as reasonable grounds of suspicion supported by circumstances sufficiently strong to warrant a cautious person in the belief that the person has committed the offense charged. *Schmitt v State*, 590 So.2d 404, 409 (Fla 1991). Probable cause exists where the facts and circumstances, of which an [investigator] has reasonably trustworthy information, are sufficient in themselves for a reasonable man to reach the



conclusion that an offense has been committed *Department of Highway Safety and Motor Vehicles v. Favino*, 667 So.2d 305, 309 (Fla. 1<sup>st</sup> DCA 1995).

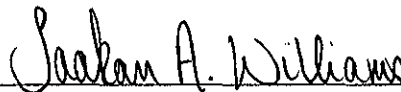
14. The facts set forth above show that Respondent is a candidate for the office of Mayor of the City of West Melbourne. During his campaign, Respondent failed to timely notify the filing officer on the prescribed reporting date that no report would be filed for the 2015 M3 Report.

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

**Count 1:**

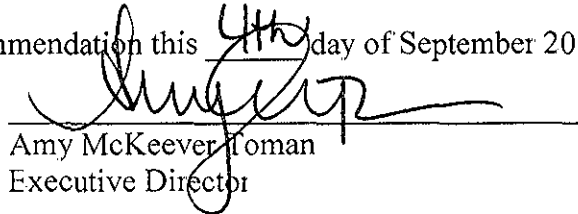
On or about April 10, 2015, Respondent violated Section 106.07(7), Florida Statutes, when he failed to notify the filing officer on the prescribed reporting date that no report would be filed on that date because he had not received funds, made contributions, or expended reportable funds during the 2015 M3 Report.

Respectfully submitted on September 8<sup>th</sup>, 2015



Jaakan A. Williams  
Assistant General Counsel

I reviewed this Staff Recommendation this 4<sup>th</sup> day of September 2015.



Amy McKeever Toman  
Executive Director

**FLORIDA ELECTIONS COMMISSION  
PHONE LOG  
Case No.: FEC 15-344**

**Respondent:** Richard J. Venerable

**Complainant:** Susan Frank

1. **Date and time:** July 9, 2015 @ 10:42 a.m.

**Name:** Complainant

**Phone #:** 321 837.7774

**Summary:** I telephoned Respondent's filing officer to determine (1) whether candidate filings are posted somewhere on the city's website; (2) whether Respondent is serving as his own campaign treasurer; and (3) whether anything—treasurer's report or waiver—has been filed for the 2015 M3 reporting period.

Complainant, the municipal clerk for the City of West Melbourne, advised me that candidate filings are not posted on the city's website. The filing officer advised me that a waiver for the M3 reporting period was filed on June 25, 2015; it was due on April 10<sup>th</sup>.

As for my question pertaining to the campaign's treasurer, the filing officer was unsure. After reviewing the candidate's file, she could only find a form for the appointment of a deputy treasurer—Respondent's wife, Tracy Venerable.

I asked the filing officer whether she would fax a copy of the waiver for the 2015 M3 reporting period to me. Complainant said that she would but she asked whether she could go ahead and fax copies of everything that was filed late, so I would not have to call her again. I told her that this would be okay.

**Memo to File?** No

**Entered by:** dbf

2. **Date and time:** July 23, 2015 @ 3:25 pm

**Name:** Respondent

**Phone #:** (321) 213-3558

**Summary:** I attempted telephone contact to make initial contact. I left a message to return my call.

**Memo to File?** No

**Entered by:** CKO

3. **Date and time:** July 24, 2015 @ 2:50 pm

**Name:** Respondent

**Phone #:** (321) 213-3558

**Summary:** I attempted telephone contact to inquire about allegations. I left a message to return my call.

**Memo to File?** No

**Entered by:** CKO

4. **Date and time:** July 27, 2015 @ 11:00 am

**ATTACHMENT "A"**

**Name:** Sue Frank—Filing Officer

**Phone #:** (321) 837-7774

**Summary:** I had telephone contact to request additional information from her: DS-DE 9 form, filing history, acknowledgement letter, statement of candidate, 2015 M3 Report, and any other pertinent information for Respondent. Ms. Frank advised me that she would gather up all of this information and email it to my attention. She did explain that no acknowledgement letter was given to any of the candidates. She told me that she has a checklist that she has the candidates sign acknowledging receipt of required documents. I requested this checklist as well.

**Memo to File?** No

**Entered by:** CKO

5 **Date and time:** July 27, 2015 @ 12:00 pm

**Name:** Respondent

**Phone #:** (321) 213-3558

**Summary:** I had telephone contact to make initial contact. Respondent advised me that he was a first-time candidate that "screwed up by relying on someone else to do my reporting for me. I should've been going behind him but I was working out of state and I was rarely home. That's my own fault and I take full responsibility" I inquired if he had read/printed Chapter 106, Florida Statutes, Calendar of Reporting Dates, and the Candidate and Campaign Treasurer Handbook. Respondent admitted that he had read each of these. I inquired about report activity. Respondent told me that his campaign did not spend any monies during the election campaign. He told me that the "automatic bank fees" that are withdrawn on the account are the only activity going on with the depository. He told me that he would call me back with account number information for me to complete subpoena.

**Memo to File?** No

**Entered by:** CKO

6 **Date and time:** July 27, 2015 @ 2:00 pm

**Name:** Respondent

**Phone #:** (321) 213-3558

**Summary:** I had voice message on my answering machine from Respondent. Respondent advised me that his depository is at TD Bank and the account number is [REDACTED]. I also obtained his email address: [rikv08@aol.com](mailto:rikv08@aol.com).

**Memo to File?** No

**Entered by:** CKO

7 **Date and time:** July 30, 2015 @ 2:15 pm

**Name:** Sue Frank—Filing Officer

**Phone #:** (321) 837-7774

**Summary:** I attempted telephone contact to verify some information. I left a message to have my call returned.

**Memo to File?** No

**Entered by:** CKO

**FLORIDA ELECTIONS COMMISSION**

**Report of Investigation for Failure to Notify Filing Officer**

**Case Number** FEC 15-344

**Respondent:** Richard J Venerable

Section 106.07(7), Florida Statutes, failure of a candidate who did not receive any contributions or make any expenditures during a reporting period to notify timely the filing officer, in writing, that no report is being filed

**Complainant:** Sue Frank

**Respondent Type:**

- Candidate  
 Political Committee

**I. Preliminary Information:**

1. An appointment of Campaign Treasurer and Designation of Campaign Depository (DS-DE 9) was filed on March 2, 2015 (Ex. 1)

2. An acknowledgement receipt was provided to Respondent on March 2, 2015 acknowledging that Respondent had received all of the Division's publications and reporting forms, including Chapter 106, Florida Statutes, the Candidate and *Campaign Treasurer Handbook*, and the Calendar of Reporting Dates (Ex. 2)

3. The *Candidate and Campaign Treasurer Handbook*, discusses filing a waiver when there is no activity to disclose on page 47 (Ex. 3)

4. Pages 12, 13, 44, and 45 of the *Candidate EFS User's Guide* discuss how to notify the Division on the prescribed reporting date that no report will be filed using the EFS. Specifically, page 13 instructs the user to click the box next to "waiver" if there is no activity to disclose (Ex. 4)

5. In a telephone interview on April 2, 2015, Kristi Reid-Bronson clarified that once the waiver box is chosen and a new report is opened as shown on Page 12, the only available option on the report summary screen will be "Go To File Report" as shown on Page 13. Choosing "Go To File Report" will take the user directly to the screens where the candidate/treasurer PINS are entered as shown on Pages 44 and 45

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

6. Respondent's filing history reflects the 2015 M3 Waiver-of-Report was filed on June 25, 2015. The information regarding the 2015 M3 waiver-of-report is summarized below. (Ex. 5)

Report	Report Cover Period	Date Notification Due	Date Notification Filed	No. of Days Late
2015 M3	3/1/15 – 3/31/15	4/10/15	6/25/15	76

7. Respondent did not provide a written response to the referral


8. Respondent was interviewed by telephone on July 27, 2015 in which he stated that he was a first-time candidate that "screwed up by relying on someone else to do my reporting for me. I should've been going behind him but I was working out of state and I was rarely home" Respondent advised me that his campaign did not spend any monies during the campaign, with the exception of bank fees that were automatically deducted

**III. FEC History:**

9. Respondent has not had any prior cases before the Commission.

**Conclusion:**

10 Respondent stated during the telephone interview that he did read Chapter 106, Florida Statutes and/or the *Candidate and Campaign Treasurer Handbook*. Respondent signed his Statement of Candidate form on March 2, 2015. (Ex. 6)

SIGNATURE OF INVESTIGATOR:  Date: 8/3/15

**FLORIDA ELECTIONS COMMISSION**  
**REPORT OF INVESTIGATION**  
**Richard J. Venerable -- FEC 15-344**

<b>LIST OF EXHIBITS</b>	
<b>Exhibits #s</b>	<b>Description of Exhibits</b>
Exhibit 1	Respondent's DS-DE 9 form
Exhibit 2	Acknowledgement Receipt
Exhibit 3	Relevant pages from the Candidate and Campaign Treasurer Handbook
Exhibit 4	Relevant pages from the Candidate EFS User's Guide
Exhibit 5	2015 M3 Waiver-of-Report
Exhibit 6	Statement of Candidate

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

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

(PLEASE PRINT OR TYPE)

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

**OFFICE USE ONLY**

**1. CHECK APPROPRIATE BOX(ES):**

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

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

Richard J Venerable

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

255 Bry-Lynn Drive  
West Melbourne FL 32904

**4 Telephone**

(321) 213-3558

**5 E-mail address**

RikV08@aol.com

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

Mayor

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

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

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

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

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

**10. Name of Treasurer or Deputy Treasurer**

Tracy Venerable

**11. Mailing Address**

255 Bry-Lynn Drive

**12. Telephone**

(321) 480-5753

**13. City**

West Melbourne

**14 County**

Brevard

**15. State**

FL

**16. Zip Code**

32904

**17 E-mail address**

TBrisco512@aol.com

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

**19 Name of Bank**

TD Bank

**20. Address**

**21. City**

**22. County**

**23. State**

**24. Zip Code**

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

**25. Date**

March 2, 2015

**26. Signature of Candidate**

X 

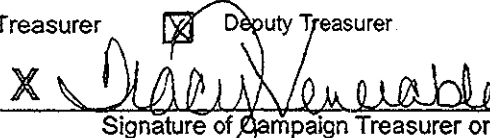
**27. Treasurer's Acceptance of Appointment** (fill in the blanks and check the appropriate block)

I, Tracy Venerable, do hereby accept the appointment  
(Please Print or Type Name)

designated above as:     Campaign Treasurer     Deputy Treasurer.

March 2, 2015

Date

X 

Signature of Campaign Treasurer or Deputy Treasurer



**2016 Announced Candidate Information Checklist**

1. Richard J Venerable, candidate for the Office of

(Circle one of the following)

Mayor

City Council Member

acknowledge receipt of the following:

1. City of West Melbourne Election Information Handout
2. Chapter 106, Florida Statutes, on Campaign Financing
3. Candidate and Campaign Treasurer Handbook
4. Reporting Dates for Campaign Treasurer Reports and copies of forms
5. City of West Melbourne Charter and Code of Ordinances relating to elections
6. Nominating Petition forms
7. City of West Melbourne Political Sign Regulations
8. Polling Place Activities on Election Day
9. Guide to the Sunshine Amendment and Code of Ethics for Public Officers and Employees
10. Voter Registration List for West Melbourne will be available from the City Clerk at the end of July 2016. Prior to July 2016, a copy may be obtained from the Brevard County Supervisor of Elections

  
\_\_\_\_\_  
Signature of Candidate

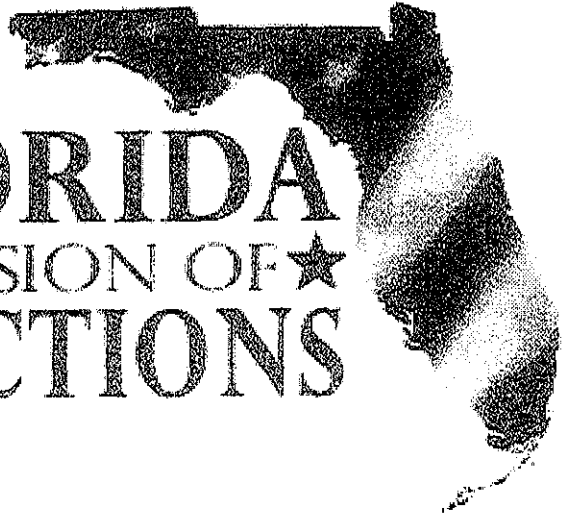
<sup>NW</sup>  
2-2-15  
\_\_\_\_\_  
Date

2/5/2015

EXHIBIT 2



# Candidate & Campaign Treasurer Handbook



**FLORIDA**  
★ DIVISION OF ★  
**ELECTIONS**

November 2013  
Florida Department of State  
Division of Elections  
R. A. Gray Building, Room 316  
500 South Bronough Street  
Tallahassee, FL 32399-0250  
(850) 245-6240

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This publication is available in alternate format upon request by contacting the Division of Elections at 850 245.6240.

EXHIBIT 3(5 of 6)

day designated is deemed timely filed. A report received by the filing officer within 5 days after the designated due date that was delivered by the U.S. Postal Service is deemed timely filed unless it has a postmark indicating the report was mailed after the designated due date. A certificate of mailing obtained from and dated by the U.S. Postal Service at the time of mailing or a receipt from an established courier company, which bears a date on or before the date on which the report is due, is proof of mailing in a timely manner. Reports filed with the Division through the Electronic Filing System (EFS) are due no later than midnight, Eastern Time, of the due date.

*(Sections 106.07, 106.0705  
and 106.141, F.S.)*

#### **Penalty for Late Filing**

Any candidate failing to file a report on the designated due date shall be subject to a fine of \$50 per day for the first three days late and, thereafter, \$500 per day for each late day, not to exceed 25 percent of the total receipts or expenditures, whichever is greater, for the period covered by the late report. However, for the reports immediately preceding the primary and general election, the fine shall be \$500 per day for each late day, not to exceed 25 percent of the total receipts or expenditures, whichever is greater, for the period covered by the late report. For a candidate's termination report, the fine shall be \$50 per day for each late day, not to exceed 25 percent of the total receipts or expenditures, whichever is greater for the period covered by the late report. All fines must be paid from the candidate's **personal funds** – not campaign funds.

*(Section 106.07(2) and (8), F.S.)*

#### **Waiver of Report**

In any reporting period during which a candidate has not received funds or made any expenditures, the filing of the required report for that period is waived; **however**, the candidate must indicate there is no activity by filing a waiver of report on the prescribed due date. (Waivers filed with the Division must be filed using the EFS.) The next report filed must specify that the report covers the entire period between the last submitted report and the report being filed.

*(Section 106.07, F.S.)*

#### **Incomplete Reports**

If a campaign treasurer files a report that is deemed incomplete, it shall be accepted on a conditional basis. The campaign treasurer will be notified by the filing officer as to why the report is incomplete. The campaign treasurer must file an addendum to the incomplete report within seven days of notification. The addendum must include all necessary information to complete the report.

*(Section 106.07(2), F.S.)*

#### **Reporting Total Sums**

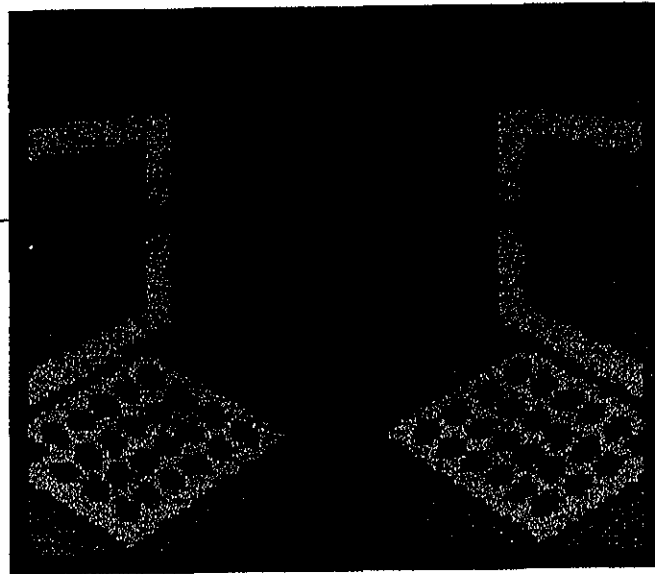
Each campaign treasurer's report required by Chapter 106, F.S., shall contain the total sums of all loans, in-kind contributions, and other receipts by or for such candidate, and total sums of all expenditures made by such candidate during the reporting period. The

reporting forms shall be designed to elicit separate totals for in-kind contributions, loans, and other receipts

*(Section 106.07, F.S.)*

**Department of State  
Division of Elections**

# **Candidate EFS User's Guide**



**Florida Department of State  
Division of Elections  
R.A. Gray Building, Room 316  
500 S Bronough Street  
Tallahassee, FL 32399-0250**

**EFS HELP LINE: 850-245-6280**

**January 2011**

**EXHIBIT 4 (1 of 6)**

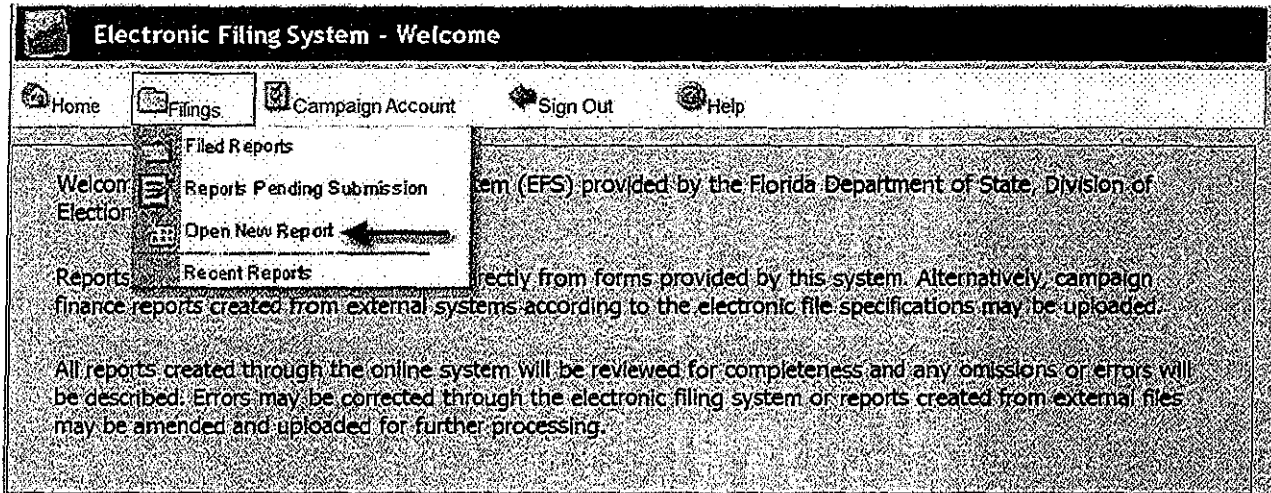
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# Create a New Report by Data Entry

From the Welcome Screen, click  Filings and then  Open New Report



Use this form to submit an original report. To submit an amendment to a previously filed report, first select the report from the 'Filed Reports' listing and then choose the 'Amend Report' option from the 'Edit' menu item.


**Coverage Periods**  
Campaign finance reports itemize financial activity occurring during a specific reporting period. The reporting period is declared by first selecting the reporting year and then the report type. The beginning and ending coverage dates and the filing due date of the report are automatically associated with the *Reporting Year* and *Report Type*.


Election Cycle: 2010 General Election  
Report Type: F2 2010  
Coverage Period: 7/17/2010 7/30/2010 Due Date: 08/06/2010

Special Election Report  Waiver

**Uploading a Campaign Finance Report**  
A Campaign Finance report file meeting the department's specifications may be uploaded at the time a report is opened. Use the Browse button to locate and select the report text or zip file to be uploaded. You may upload the report file in a compressed zip. The zip file must contain only one report file.

Browse...  
Open Report

Click  arrow next to **Election Cycle**. Scroll to the cycle associated with the report you are entering.

Click  arrow next to **Report Type** and select the report type that corresponds to the appropriate cover period and due date.

The **Cover Period** dates will automatically fill in based on the **Calendar of Election and Reporting Dates**. The end date can be changed for candidate termination reports.

The Due Date will automatically fill in based on the Calendar of Election and Reporting Dates

\*\*\*\*NOTE\*\*\*\*

If this report is a waiver of report (no activity), click the  box next to Waiver.

Election Cycle: 2010 General Election  
Report Type: F2 2010  
Coverage Period: 7/17/2010 7/30/2010 Due Date: 08/06/2010  
 Amend Election Report  Waiver

Click **Open Report** at the bottom of the screen. A Report Detail screen (view only) will appear. This screen will not indicate any activity until individual detail data is entered, saved and a review is performed.

Report: 2010-G4-27 2010 General Election Covers: 10/16/2010-10/28/2010 Due: 10/29/2010

Amendment  Waiver Complete Status: Incomplete Detail Records  
File Date: Review Status: Not Reviewed  
Status: Calc Entry Last Review:

# of Transactions: 0 **Review** **Recalculate** **Go To File Report** **Append File** **Delete Report** **Save**

Contributions	Total Amount	Expenditures	Total Amount
Cash and Checks:	0.00	Monetary:	0.00
Loans:	0.00	Transfers to Off Acct:	0.00
Total Monetary:	0.00	Total Monetary:	0.00
In-Kind:	0.00	Other Distributions:	0.00

Review Messages

Created: 10/26/2010 11:41:25 AM By: 50552 Revised: 10/26/2010 11:41:25 AM By: 50552

EXHIBIT 4(4 of 6)

# File the Report

If the **Review Status** is Updated Detail – Needs Review the report has not been reviewed since the last update. (See page 38 for instructions on how to submit the report to the system for review.)

If the status of the report is Complete Detail Records, you are ready to file the report.

Report: 2010 - F3 - 26      2010 General Election      Covers: 8/7/2010-8/19/2010      Due: 8/20/2010

Amendment     Waiver      Complete Status: **Complete Detail Records** ←

File Date:       Review Status: **Reviewed**

Status: **Data Entry**      Last Review: **8/19/2010 3:56:42 PM**

# of Transactions:                        

Contributions		Total Amount	Expenditures		Total Amount
Cash and Checks:	<input type="text"/>	0.00	Monetary:	<input type="text"/>	51.00
Loans:	<input type="text"/>	0.00	Transfers to Off Acct:	<input type="text"/>	0.00
Total Monetary:	<input type="text"/>	0.00	Total Monetary:	<input type="text"/>	51.00
In-Kind:	<input type="text"/>	0.00	Other Distributions:	<input type="text"/>	0.00

Review Messages:

Created: 8/19/2010 2:01:35 PM    By: 50552    Revised: 8/19/2010 3:56:42 PM    By: 50552

Click on

The **candidate** enters his or her **PIN**, and then selects

**NOTE: A PIN is the same as your signature attesting to the validity of the report.**

Step 1: Enter the candidate/chairperson PIN.

Step 2: Select the 'Report Approved' button.

---

Report: 2010 - F3 - 26      Coverage Period: 8/7/2010-8/19/2010      Due: 8/20/2010

Review Status: **Reviewed**       Original     Amended

Waiver

PIN for Candidate/Chairperson:        ←

If there is more than one treasurer, click on the drop down and select the treasurer that is filing the report.

Campaign Treasurer:  

The treasurer enters his or her PIN and then clicks


Report: 2010 - F3 - 26      Coverage Period: 8/7/2010-8/19/2010      Due: 8/20/2010

Review Status:        Original     Amended

Campaign Treasurer:        Waiver

---

PIN for specified Treasurers:

To Edit Report Again Select Cancel:      

**IMPORTANT NOTE:** If changes need to be made after a candidate enters his PIN, the treasurer must undo the candidate's PIN validation before the system will allow changes. See page 48 for instructions.

EXHIBIT 4 (b of 6)

# WAIVER OF REPORT

(Section 106.07(7), F.S.)

(PLEASE TYPE)

JUN 25 '15 AM 10:58

OFFICE USE ONLY

Richard Venerable

Name

West Melbourne Mayor

Office Sought

255 Bry Lynn Drive

Address

West Melbourne FL 32904

City

State

Zip Code

Candidate

Political Committee

Party Executive Committee

NOTE: This form does not apply to an electioneering communications organization (ECO). An ECO must file a report (not a waiver) that no reportable contributions or expenditures were made during the reporting period (s. 106.0703(6), F.S.).

Check here if address has changed since last report

Check here if PC has DISBANDED and will no longer file reports

### TYPE OF REPORT (Check Appropriate Box and Complete Applicable Line beneath Box)

MONTHLY REPORT

PRIMARY ELECTION

GENERAL ELECTION

OTHER REPORT TYPE

Indicate report #

M 3

Indicate report #

P \_\_\_\_\_

Indicate report #

G \_\_\_\_\_

Indicate report type and # as applicable:

TERMINATION REPORT

SPECIAL ELECTION

### NOTIFICATION OF NO ACTIVITY IN CAMPAIGN ACCOUNT FOR THE REPORTING PERIOD OF

03/01/2015

THROUGH 03/31/2015

X

Signature

Date

X

Signature

Date

### REQUIRED SIGNATURES FOR:

Candidates:

Candidate and Campaign Treasurer or Deputy Treasurer (s. 106.07(5), F.S.)

Political Committees:

Chairman and Campaign Treasurer or Deputy Treasurer (s. 106.07(5), F.S.)

Party Executive Committees:

Treasurer and Chairman (s. 106.29(2), F.S.)

Except as noted above for an ECO in any reporting period when there has been no activity in the account (no funds expended or received) the filing of the required report is waived. However, the filing officer must be notified in writing on the prescribed reporting date that no report is being filed.

OFFICE USE ONLY

**STATEMENT OF  
CANDIDATE**

(Section 106.023, F.S.)

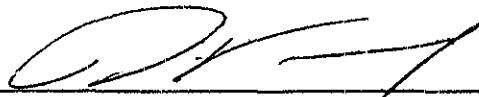
(Please print or type)

I, Richard J Venerable,

candidate for the office of Mayor;

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

X



Signature of Candidate

March 2, 2015

Date

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



**FLORIDA ELECTIONS COMMISSION**

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

July 21, 2015

Richard J. Venerable  
255 Bry-Lynn Drive  
West Melbourne, FL 32904

**RE: Case No.: FEC 15-344; Respondent: Richard J. Venerable**

Dear Mr. Venerable:

On May 13, 2015, 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 violation:

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

- 2015 M3 (March 2-March 31)

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

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

The Commission will then hold a hearing to determine whether there is probable cause to believe you have violated Chapters 104 or 106, Florida Statutes. You and the complainant will receive a

notice of hearing at least 14 days before the hearing. The notice of hearing will indicate the location, date, and time of your hearing. You will have the opportunity to make a brief oral statement to the Commission, but you will not be permitted to testify or call others to testify, or introduce any documentary or other evidence.

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

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

Under section 106 25, Florida Statutes, complaints, Commission investigations, investigative reports, and other documents relating to an alleged violation of Chapters 104 and 106, Florida Statutes, are confidential until the Commission finds probable cause or no probable cause. The confidentiality provision does not apply to the person filing the complaint. However, it does apply to you unless you waive confidentiality in writing. The confidentiality provision does not preclude you from seeking legal counsel. However, if you retain counsel, your attorney must file a notice of appearance with the Commission before any member of the Commission staff can discuss this case with him or her.

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

Sincerely,

Amy McKeever Toman  
Executive Director

AMT/enr



STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION

107 West Gaines Street, Suite 224, Tallahassee, Florida 32399-1050  
Telephone Number: (850) 922-4539  
www.fec.state.fl.us

RECEIVED

2015 MAY 13 P 12:51

CONFIDENTIAL COMPLAINT FORM

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 the complaint is brought.

1. PERSON BRINGING COMPLAINT:

Name: Sue Frank, City Clerk Work Phone: (321) 837-7774  
Address: 2240 Minton Road Home Phone: ( )  
City: West Melbourne County: Brevard State: FL Zip Code: 32904

2. PERSON AGAINST WHOM COMPLAINT IS BROUGHT:

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

Name of individual or entity: Richard J. Venerable  
Address: 255 Bry-Lynn Drive Phone: (321) 213-3558  
City: West Melbourne County: Brevard State: FL Zip Code: 32904

If individual is a candidate, list the office or position sought: Mayor of West Melbourne

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

3. ALLEGED VIOLATION(S):

Please 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 the following provisions: Chapter 104, Chapter 106, and Section 105.071, Florida Statutes. Also, please include:

- The facts and actions that you believe support the violations you allege,
- The names and telephone numbers of persons you believe may be witnesses to the facts,
- A copy or picture of the political advertisements you mention in your statement,
- A copy of the documents you mention in your statement, and
- Other evidence that supports your allegations.

Pursuant to Florida Statutes 106.07(8)(d) Mr. Venerable has not submitted a Campaign Finance contribution/expenditure report, or a Waiver of Report for the period covering March 2, 2015 (date of DS-DE 9 form) through March 31, 2015. On April 15, 2015 (after the five day waiting period to see if the report was sent by U.S. P.S. and postmarked by April 10, 2015) I mailed a letter to Mr. Venerable informing him that I had not received the necessary report. On April 24, 2015 I mailed a certified/return receipt letter to Mr. Venerable informing him that I still had not received the report and informing him that I must receive the report

within three days from receipt of the certified letter. The certified letter notification was received in my office on April 29, 2015 showing the letter was signed for on April 27, 2015. On May 4, 2015 at 12:14 p.m. I spoke to Mr. Venerable on the phone explaining I had not received his report. He stated he had been out of town but thought the report had been submitted. He would check and get back in touch with me. Today is May 7, 2015 at 2:51 p.m. and Mr. Venerable has not spoken to me or submitted his report that was due on April 10, 2015.

Additional materials attached (check one)?  Yes  No

**4. OATH**

**STATE OF FLORIDA**  
**COUNTY OF** Brevard

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

2015 MAY 13 P 12:51  
COMMUNITY DEVELOPMENT

*Sue Frank*

**Original Signature of Person Bringing Complaint**

Sworn to and subscribed before me this 7th day of May, 20 15

*Christine D. Pennington*

Signature of Officer Authorized to Administer Oaths or Notary public



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

Personally known X 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.

MAYOR  
Hal J. Rose

DEPUTY MAYOR  
Bill Mettrick

COUNCIL MEMBERS  
Pat Bentley  
Stephany Eley  
Barbara A. Smith  
John "Coach" Tice  
Andrea Young



City Council/Clerk Department  
Sue Frank, City Clerk  
CITY HALL  
2240 Minton Road  
West Melbourne, FL 32904  
Phone: (321) 837-7774  
Fax: (321) 768-2390  
www.westmelbourne.org

April 15, 2015

Mr. Richard J. Venerable  
255 Bry-Lynn Drive  
West Melbourne, FL 32904

Dear Mr. Venerable:

Your campaign treasurer's report, which was due on April 10, 2015, covering the period running from March 2, 2015 through March 31, 2015 has not been received. This report needs to be submitted immediately.

Section 106.07(8)(b), *Florida Statutes*, provides for a fine of \$50 per day for the first three days a report is late and, thereafter \$500 per day, although a fine cannot exceed 25% of the total receipts or expenditures, whichever is greater, for the period covered by the late report. Please note that for the report immediately preceding the general election, the fine shall be \$500 per day for each late day, not to exceed 25% of the total receipts or expenditures, whichever is greater, for the period covered by the late report. For 90 day termination reports, the fine is \$50 per day for each late day, not to exceed 25% of the total receipts or expenditures, whichever is greater, for the period covered by the late report.

The statute also allows for appeal of the fine. The statute states:

"Any candidate or chair of a political committee may appeal or dispute the fine, based upon, but not limited to, unusual circumstances surrounding the failure to file on the designated due date, and may request and shall be entitled to a hearing before the Florida Elections Commission, which shall have the authority to waive the fine in whole or in part. The Florida Elections Commission must consider the mitigating and aggravating circumstances contained in s. 106.265(1) when determining the amount of a fine, if any, to be waived. Any such request shall be made within 20 days after receipt of the notice of payment due. In such case, the candidate or chair of the political committee shall, within the 20-day period, notify the filing officer in writing of his or her intention to bring the matter before the commission."

Once your report has been received, fees may be assessed as per Section 106.07(8)(b), *Florida Statutes*. All fines must be paid from the candidate's personal funds.

If you have any questions, please feel free to contact me at 321-837-7774.

Sincerely,

A handwritten signature in cursive script that reads "Sue Frank".

Sue Frank, CMC  
City Clerk

MAYOR  
Hal J Rose

DEPUTY MAYOR  
Bill Mettrick

COUNCIL MEMBERS  
Pat Bentley  
Stephany Eley  
Barbara A. Smith  
John "Coach" Tice  
Andrea Young



City Council/Clerk Department  
Sue Frank, City Clerk  
CITY HALL  
2240 Minton Road  
West Melbourne, FL 32904  
Phone: (321) 837-7774  
Fax: (321) 768-2390  
www.westmelbourne.org

April 24, 2015

Mr. Richard J. Venerable  
255 Bry-Lynn Drive  
West Melbourne, FL 32904

**CERTIFIED/RETURN RECEIPT REQUESTED**

Dear Mr. Venerable:

On April 15, 2015 I had sent you notice that the campaign treasurer's report, which was due on April 10, 2015, covering the period running from March 2, 2015 through March 31, 2015 had not been received. As of today, this report still has not been received. Your report is required to be filed within three (3) days from receipt of this letter.

Section 106.07(8)(b), *Florida Statutes*, provides for a fine of \$50 per day for the first three days a report is late and, thereafter \$500 per day, although a fine cannot exceed 25% of the total receipts or expenditures, whichever is greater, for the period covered by the late report. Please note that for the report immediately preceding the general election, the fine shall be \$500 per day for each late day, not to exceed 25 % of the total receipts or expenditures, whichever is greater, for the period covered by the late report. For 90 day termination reports, the fine is \$50 per day for each late day, not to exceed 25% of the total receipts or expenditures, whichever is greater, for the period covered by the late report.

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Once your report has been received, this office will notify you of the specific amount of your fine. All fines must be paid from the candidate's personal funds.

If you have any questions, please feel free to contact me at 321-837-7774.

Sincerely,

A handwritten signature in black ink that reads "Sue Frank".

Sue Frank, CMC  
City Clerk

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature  <i>R. Venerable</i> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) _____ C. Date of Delivery  <u>4-27</u></p>
<p>1. Article Addressed to:</p> <p>Mr. Richard J Venerable  255 Bry-Lynn Drive  West Melbourne, FL 32904</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type  <input type="checkbox"/> Certified Mail® <input type="checkbox"/> Priority Mail Express™  <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> Collect on Delivery</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label) <u>7014 2120 0000 4448 7682</u></p>	
<p>PS Form 3811, July 2013 Domestic Return Receipt</p>	

**U.S. Postal Service™**  
**CERTIFIED MAIL® RECEIPT**  
Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

**OFFICIAL USE**

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Sent To  
Mr. Richard J. Venerable  
255 Bry-Lynn Drive  
West Melbourne, FL 32904

PS Form 3800, July 2014 See Reverse for Instructions

7014 2120 0000 4448 7682

WEST MELBOURNE FL 32904  
APR 24 2015  
Postmark Here