

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**In Re: Sunshine State Heritage Political Action  
Committee Corporation**

**Case No.: FEC 19-075**

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**TO:** David M. Nash, Chair  
19800 Southwest 14th Court  
Pembroke Pines, FL 33029

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

**NOTICE OF HEARING (INFORMAL HEARING)**

A hearing will be held in this case before the Florida Elections Commission **on August 26, 2020 at 8:30 am, EST**, or as soon thereafter as the parties can be heard.

Please note that because of COVID-19, this will be a virtual meeting conducted by remote video or teleconference. Enclosed you will find additional details on joining the video conference via GoToWebinar, 9-Digit Meeting ID 602-468-659, or via teleconference by dialing (866) 901-6455 and entering the meeting access code 515-462-864, when prompted. If you wish to speak before the Commission, you will need to appear by webcam and will be sworn in remotely. Please be advised that the Commission will consider multiple cases, so you will need to wait until your case is considered. If you have any questions, please contact Commission staff at (850) 922-4539.

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

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

**If you are the Respondent**, you may attend the hearing, and you or your attorney will have *5 minutes* to present your case to the Commission. However, some cases (including those in which motions to dismiss 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 motions to dismiss 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. 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 13, 2020

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

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

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



# Florida Elections Commission

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

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

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



## **Commission Meeting August 26, 2020 at 8:30AM via GoToWebinar and OpenVoice**

In order to participate in the public portion of the August 26, 2020, Florida Elections Commission meeting, please follow the instructions below:

- A. GoToWebinar – Remote Video Conferencing
  1. Open your web browser and search GoToWebinar or enter [www.gotowebinar.com](http://www.gotowebinar.com)
  2. Select Join A Webinar in the upper right corner of the website
  3. Enter the 9-digit Webinar ID: 602-468-659  
And your email address
  4. Register your name and email address
  5. You will automatically join to the meeting as an attendee. Attendees are muted and can choose to their webcam.
  
- B. OpenVoice - Teleconference
  1. Call 1-866-901-6455
  2. Enter Audio Access Code 515-462-864
  3. You will automatically join the meeting as an attendee. Attendees are muted.

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

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

Thank you,

Commission Staff

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**In Re: Sunshine State Heritage Political Action  
Committee Corporation**

**Case No.: FEC 19-075**

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**TO:** David M. Nash, Chair  
19800 Southwest 14th Court  
Pembroke Pines, FL 33029

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

**NOTICE OF HEARING (INFORMAL HEARING)**

A hearing will be held in this case before the Florida Elections Commission on August 26, 2020 at 8:30 am, EST, or as soon thereafter as the parties can be heard.

**Please note that because of COVID-19, this will be a virtual meeting conducted by remote video conference only. Prior to the meeting, the Commission office will send you a set of participant instructions, which will include login information for the meeting. Please be advised that the Commission will consider multiple cases that day, so you will need to wait until your case is considered. If you have questions, please contact Commission staff at (850) 922-4539.**

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**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 motions to dismiss or recommendations for no probable cause are being considered) may be decided by an *en masse* vote and, unless the Respondent requests to be heard or the Commission requests that the case be considered separately on the day of the hearing, the case will *not* be individually heard.

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

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

***Tim Vaccaro***

Executive Director  
Florida Elections Commission  
July 28, 2020

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 **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.

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

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**In Re: Sunshine State Heritage Political Action  
Committee Corporation**

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**Case No.: FEC 19-075**

**TO:** David M. Nash, Chair  
19800 Southwest 14th Court  
Pembroke Pines, FL 33029

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

**NOTICE OF CANCELLATION OF HEARING (INFORMAL HEARING)**

You are hereby notified that the previously scheduled **hearing for March 24-25, 2020 is cancelled**. It is anticipated that your case will be heard at the next regularly scheduled meeting, which is currently set for May 2020. A Notice of Hearing will be mailed approximately 14 days prior to the hearing date indicating the exact date, time, and location.

***Tim Vaccaro***

Executive Director  
Florida Elections Commission  
March 12, 2020

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**In Re: Sunshine State Heritage Political Action  
Committee Corporation**

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**Case No.: FEC 19-075**

**TO:** David M. Nash, Chair  
19800 Southwest 14th Court  
Pembroke Pines, FL 33029

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

**NOTICE OF HEARING (INFORMAL HEARING)**

A hearing will be held in this case before the Florida Elections Commission on, **March 24, 2020 at 1:00 p.m., or as soon thereafter as the parties can be heard**, at the following location: **House Office Building, 404 South Monroe Street, Room 28-H, Tallahassee, Florida 32399**. Due to heightened security access requirements, please bring only essential items into the building and plan to arrive early to allow for delays coming through security.

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

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

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

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

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

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

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

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

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

***Tim Vaccaro***  
Executive Director  
Florida Elections Commission  
March 9, 2019

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.

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



**Sunshine State Heritage  
PAC**

PO Box 816451  
Hollywood, Florida, 33081  
954-614-2542  
[www.sunshinestateheritagepac.org](http://www.sunshinestateheritagepac.org)  
[david.nash@sunshinestateheritagepac.org](mailto:david.nash@sunshinestateheritagepac.org)

Molly Donovan  
Florida Elections Commission  
107 West Gaines Street  
Suite 224  
Tallahassee, Florida 32399  
Attn: Molly Donovan

December 19, 2019

To Whom it May Concern:

Please be advised that the Sunshine State Heritage PAC was disbanded in October 2019. I am in receipt of complaints FEC 19-491, 550, and 075. All reports have been filed with the Division of Elections and all funds in the PAC bank account has been disbursed per the requirements of the State of Florida. At this time there are no funds in the bank account. Laura Nash was also removed as the treasurer of the PAC in October as well. In the coming months, there will be no mail accepted for the PAC at any of the PAC addresses. If you have any questions or concerns, please contact me.

Sincerely,



David M. Nash  
Chairman  
Sunshine State Heritage PAC Corporation



## FLORIDA DEPARTMENT of STATE

**RON DESANTIS**  
Governor

**LAUREL M. LEE**  
Secretary of State

October 30, 2019

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation (65314)  
Post Office Box 816451  
Hollywood, Florida 33021

Dear Mr. Nash:

This will acknowledge receipt of your committee's letter informing us of the disbandment of **Sunshine State Heritage Political Action Committee Corporation** as a political committee. This information has been placed on file in our office. Your final report (2019 M10) may be filed at any time but is due no later than **November 12, 2019**. This report must be filed via the Division's Electronic Filing System (EFS). If you have no activity to report, you are still required to file a waiver. Should you need to file amendments after the final report has been filed, please contact our office to have your account activated.

If you have any questions, or if we may be of further assistance to you at any time, please do not hesitate to call (850) 245-6280.

Sincerely,

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

Kristi Reid Willis, Chief  
Bureau of Election Records

KRW/gm



# Florida Elections Commission

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

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

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



December 9, 2019

Sunshine State Heritage Political Action Committee Corporation  
David M. Nash, Chair  
19800 Southwest 14th Court  
Pembroke Pines, FL 33029

**RE: Case No.: FEC 19-075; Respondent: Sunshine State Heritage Political Action  
Committee Corporation**

Dear Mr. Nash:

The Florida Elections Commission at its last regularly scheduled meeting considered this case and entered the enclosed order. Please read the order carefully.

Please let me know if you have any questions or if I can be of any further assistance.

Sincerely,

*Donna Ann Malphurs*  
Agency Clerk

/dam

Enclosure: Order

cc: Division of Elections, Complainant



RECEIVED

2019 DEC 26 A 11:10

STATE OF FLORIDA  
ELECTIONS COMMISSION

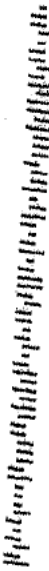
*Florida Elections Commission  
107 West Gaines St.  
Suite 224  
Tallahassee FL 32309  
Attn: Molly Donovan*

WEST PALM BCH FL 334

20 DEC 2019 PM 1 L



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STATE OF FLORIDA  
ELECTIONS COMMISSION

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**Florida Elections Commission,  
Petitioner,**

**Case No.: FEC 19-075**

**v.**

**Sunshine State Heritage Political Action  
Committee Corporation,  
Respondent.**

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**ORDER OF PROBABLE CAUSE**

**THIS MATTER** was heard by the Florida Elections Commission (Commission) at its regularly scheduled meeting on November 19, 2019, in Tallahassee, Florida.

On September 30, 2019, 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 October 27, 2018, Sunshine State Heritage Political Action Committee Corporation violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2018 D1 Report.

**Count 2:**

On or about October 28, 2018, Sunshine State Heritage Political Action Committee Corporation violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2018 D2 Report.

**Count 3:**

On or about October 29, 2018, Sunshine State Heritage Political Action Committee Corporation violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2018 D3 Report.

**Count 4:**

On or about October 30, 2018, Sunshine State Heritage Political Action Committee Corporation violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2018 D4 Report.

**Count 5:**

On or about October 31, 2018, Sunshine State Heritage Political Action Committee Corporation violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2018 D5 Report.

**Count 6:**

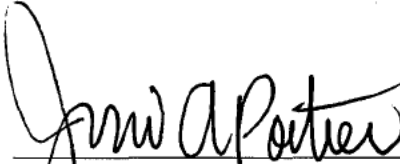
On or about November 1, 2018, Sunshine State Heritage Political Action Committee Corporation violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2018 D6 Report.

**THIS SPACE INTENTIONALLY LEFT BLANK**

**Count 7:**

On or about November 2, 2018, Sunshine State Heritage Political Action Committee Corporation violated Section 106.19(1)(c), Florida Statutes, when it deliberately failed to include information required by Chapter 106, Florida Statutes, on the committee's 2018 G7 Report.

**DONE AND ORDERED** by the Florida Elections Commission on November 19, 2019.

  
\_\_\_\_\_  
Joni Alexis Poitier, Vice Chair  
Florida Elections Commission

Copies furnished to:

Stephanie J. Cunningham, Assistant General Counsel  
Sunshine State Heritage Political Action Committee Corporation, 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 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: Sunshine State Heritage Political Action  
Committee Corporation**

---

**Case No.: FEC 19-075**

**TO:** Sunshine State Heritage Political Action  
Committee Corporation  
David M. Nash, Chair  
19800 Southwest 14th Court  
Pembroke Pines, FL 33029

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

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

A hearing will be held in this case before the Florida Elections Commission on, **November 19, 2019 at 9:00 am, or as soon thereafter as the parties can be heard**, at the following location: **Senate Office Building, 404 South Monroe Street, Room 110-S, Tallahassee, Florida 32399**. Due to heightened security access requirements, please bring only essential items into the building and plan to arrive early to allow for delays coming through security.

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

***Tim Vaccaro***

Executive Director  
Florida Elections Commission  
November 1, 2019

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**

**In Re: Sunshine State Heritage  
Political Action Committee  
Corporation**

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**Case No.: FEC 19-075**

**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(7), and 106.19(1)(c), Florida Statutes**. Based upon a thorough review of the Report of Investigation submitted on July 10, 2019, the following facts and law support this staff recommendation:

1. On February 11, 2019, the Florida Elections Commission (“Commission”) received a referral from the Department of State, Division of Elections (“Division” or “Complainant”), alleging that Sunshine State Heritage Political Action Committee Corporation (“Respondent”) violated Chapter 106, Florida Statutes.
2. Respondent is a political committee registered with the Division. (ROI Exhibit 1)<sup>1</sup>
3. By letter dated April 4, 2019, the Executive Director notified Respondent that Commission staff would investigate the following statutory provisions:

**Section 106.07(7), Florida Statutes:** As alleged in the complaint, Respondent, a political committee registered with the Division of Elections, 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 periods:

- 2018 D1
- 2018 D2
- 2018 D3
- 2018 D4
- 2018 D5
- 2018 D6
- 2018 G7

**Section 106.19(1)(c), Florida Statutes:** As alleged in the complaint, Respondent, a political committee registered with the Division of Elections, may have falsely reported or deliberately

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

failed to include information required by Chapter 106, Florida Statutes, during the following reporting periods:

- 2018 D1
- 2018 D2
- 2018 D3
- 2018 D4
- 2018 D5
- 2018 D6
- 2018 G7

4. By letter dated March 8, 2016, Kristi Reid Bronson, Chief, Bureau of Election Records, sent Respondent a letter acknowledging that the Division had received its Statement of Organization and Appointment of Campaign Treasurer and Designation of Campaign Depository for Political Committees forms. (ROI Exhibit 2, page 1)

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

6. Complainant alleged that Respondent violated Florida’s election laws by failing to notify the filing officer on the prescribed reporting dates that no reports would be filed or by falsely reporting or deliberately failing to include information required by Chapter 106, Florida Statutes, during the following reporting periods: 2018 D1, 2018 D2, 2018 D3, 2018 D4, 2018 D5, 2018 D6, and 2018 G7. *See* Compl.

7. Respondent’s 2018 D1, 2018 D2, 2018 D3, 2018 D4, 2018 D5, 2018 D6, and 2018 G7 reports were due to be filed by October 27, 2018, October 28, 2018, October 29, 2018, October 30, 2018, October 31, 2018, November 1, 2018, and November 2, 2018, respectively; however, Respondent failed to timely file the reports or notify the filing officer that no reports would be filed. The Division sent 21 letters to Respondent notifying the committee that its reports had not been received. The letters also notified Respondent that it was still required to notify the Division if the committee had no reportable financial activity. (ROI Exhibits 3-11) The letters sent by certified mail were confirmed delivered. (ROI Exhibit 11, page 8)

8. A subpoena was issued to Respondent’s designated campaign depository to ascertain whether any financial activity occurred during the relevant reporting periods, i.e., October 20, 2018 – October 26, 2018, October 27, 2018, October 28, 2018, October 29, 2018, October 30, 2018, October 31, 2018, and October 20, 2018 – November 1, 2018.<sup>2</sup> Respondent’s bank records do not show any reportable financial activity for the 2018 D1, 2018 D2, 2018 D3,

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<sup>2</sup> Political committees are required to disclose contributions in the daily “D” reports, however, expenditures are not required to be reported. If a committee does not report expenditures in the daily reports, then they must be reported during the 2018 G7 Report which covers the period of October 20, 2018 – November 1, 2018.

2018 D4, 2018 D5, and 2018 D6 reporting periods. (ROI Exhibit 12, page 4) Respondent's bank records show one expenditure in the amount of \$14 that was authorized or occurred during the 2018 G7 reporting period but was not disclosed. (ROI Exhibit 12; See ROI, p.4, n.3)

9. As it appears that Respondent had no financial activity during the 2018 D1, 2018 D2, 2018 D3, 2018 D4, 2018 D5, and 2018 D6 reporting periods, Respondent was required to notify the filing officer in writing that it would not be filing its 2018 D1, 2018 D2, 2018 D3, 2018 D4, 2018 D5, and 2018 D6 reports on the prescribed reporting dates, but failed to do so. As it appears that Respondent had financial activity during the 2018 G7 reporting period, Respondent deliberately failed to include information in its 2018 G7 Report in violation of Section 106.19(1)(c), Florida Statutes.

10. On February 8, 2019, Respondent submitted notices of no activity for the relevant reporting periods, including the reporting period where there was reportable financial activity. The notifications were between 99 and 104 days late. (See ROI, p. 3, Table 1)

11. David M. Nash, chairperson for Respondent, stated that he did not realize that he had to file notifications of no activity for the election if the committee was not participating in it. (Attachment A) It should be noted that the committee has been in existence since March of 2016 and has previously filed notifications of no activity during the 2016 election cycle.

12. "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).

13. The facts set forth above show that Respondent is a political committee registered with the Division. Respondent failed to timely file its 2018 D1, 2018 D2, 2018 D3, 2018 D4, 2018 D5, 2018 D6, and 2018 G7 reports or notify the filing officer that no reports would be filed. It appears that Respondent had no reportable financial activity during the 2018 D1, 2018 D2, 2018 D3, 2018 D4, 2018 D5, and 2018 D6 reporting periods, and therefore, was required to notify the filing officer in writing that it would not be filing its 2018 D1, 2018 D2, 2018 D3, 2018 D4, 2018 D5, and 2018 D6 reports on the prescribed reporting dates, but failed to do so. It appears that Respondent deliberately failed to include information required by Chapter 106, Florida Statutes, on the committee's 2018 G7 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 October 27, 2018, Sunshine State Heritage Political Action Committee Corporation violated Section 106.07(7), Florida

Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2018 D1 Report.

**Count 2:**

On or about October 28, 2018, Sunshine State Heritage Political Action Committee Corporation violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2018 D2 Report.

**Count 3:**

On or about October 29, 2018, Sunshine State Heritage Political Action Committee Corporation violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2018 D3 Report.

**Count 4:**

On or about October 30, 2018, Sunshine State Heritage Political Action Committee Corporation violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2018 D4 Report.

**Count 5:**

On or about October 31, 2018, Sunshine State Heritage Political Action Committee Corporation violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2018 D5 Report.

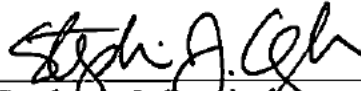
**Count 6:**

On or about November 1, 2018, Sunshine State Heritage Political Action Committee Corporation violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2018 D6 Report.

**Count 7:**

On or about November 2, 2018, Sunshine State Heritage Political Action Committee Corporation violated Section 106.19(1)(c), Florida Statutes, when it deliberately failed to include information required by Chapter 106, Florida Statutes, on the committee's 2018 G7 Report.

Respectfully submitted on September 30, 2019.



Stephanie J. Cunningham  
Assistant General Counsel

I reviewed this Staff Recommendation this 30<sup>th</sup> day of September 2019.



Tim Vaccaro  
Executive Director

AFFIDAVIT OF BACKGROUND INFORMATION  
Case Number: FEC 19-075

REC'D: FL ELECTIONS OCH  
25 JUL 19 AM 10:55

STATE OF FLORIDA  
County of Broward

David M. Nash, being duly sworn, says:

1. This affidavit is made upon my personal knowledge.
2. I am of legal age and competent to testify to the matters stated herein. I am currently employed by \_\_\_\_\_ as \_\_\_\_\_

3. What action have you taken to determine your responsibilities under Florida's election laws?

*My Pac follows the Candidate and Campaign Treasurer Handbook as closely as possible.*

4. Do you possess a copy of Chapter 106, Florida Statutes?  Yes  No  
5. If *look up if needed* so, when did you first obtain it?

6. Have you read Chapter 106, Florida Statutes?  Yes  No  
7. Do you possess a copy of Chapter 104, Florida Statutes?  Yes  No  
8. If *look up if needed* so, when did you first obtain it?

9. Have you read Chapter 104, Florida Statutes?  Yes  No  
10. Do you possess a copy of the *Candidate and Campaign Treasurer Handbook*?  Yes  No

11. If *2019* so, when did you first obtain it?

12. Have you read the *Candidate and Campaign Treasurer Handbook*? *2019*  Yes  No



13. List any additional materials you received from the Supervisor of Elections.

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14. Please explain why there were late filings for Sunshine State Heritage PAC Corporation's following campaign treasurer's reports/notices-of-no-activity:

**2018 D1-** Due 10/27/18; notice-of-no-activity filed 02/28/19.

**2018 D2-** Due 10/28/18; notice-of-no-activity filed 02/08/19.

**2018 D3-** Due 10/29/18; notice-of-no-activity filed 02/08/19.

**2018 D4-** Due 10/30/18; notice-of-no-activity filed 02/08/19.

**2018 D5-** Due 10/31/18; notice-of-no-activity filed 02/08/19.

**2018 D6-** Due 11/01/18; notice-of-no-activity filed 02/08/19.

**2018 G7-** Due 11/02/18; notice-of-no-activity filed 02/08/19.

*I didn't realize until I had contact with the state that I had to file for these special elections if I was not participating in them. Once it was reviewed with them, the reports were filed.*

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HEREBY SWEAR OR AFFIRM THAT THE FOREGOING INFORMATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

*[Handwritten Signature]*

Signature of Affiant

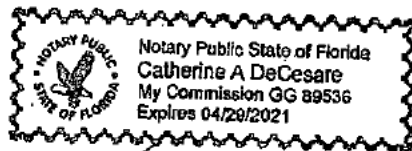
Sworn to (or affirmed) and subscribed before me this 16 day of

July, 2019

*Catherine A DeCesare*

Signature of Notary Public - State of Florida

Print, Type, or Stamp Commissioned Name of Notary Public



Personally Known  or Produced Identification

Type of Identification Produced: \_\_\_\_\_

Case Investigator: S.S.

AFFIDAVIT OF BACKGROUND INFORMATION  
Case Number: FEC 19-075

REC'D: FL ELECTIONS COM  
25 JUL '19 AM 10:55

STATE OF FLORIDA  
County of Broward

David M. Nash, being duly sworn, says:

1. This affidavit is made upon my personal knowledge.
2. I am of legal age and competent to testify to the matters stated herein. I am currently employed by \_\_\_\_\_ as \_\_\_\_\_.
3. What action have you taken to determine your responsibilities under Florida's election laws?

*My Pac follows the Candidate and Campaign Treasurer Handbook as closely as possible.*

4. Do you possess a copy of Chapter 106, Florida Statutes?  Yes  No

5. If *look up if needed* so, when did you first obtain it?

6. Have you read Chapter 106, Florida Statutes?  Yes  No

7. Do you possess a copy of Chapter 104, Florida Statutes?  Yes  No

8. If *look up if needed* so, when did you first obtain it?

9. Have you read Chapter 104, Florida Statutes?  Yes  No

10. Do you possess a copy of the *Candidate and Campaign Treasurer Handbook*?  Yes  No

11. If *2019* so, when did you first obtain it?

12. Have you read the *Candidate and Campaign Treasurer Handbook*?  Yes  No *2019*

13. List any additional materials you received from the Supervisor of Elections.

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14. Please explain why there were late filings for Sunshine State Heritage PAC Corporation's following campaign treasurer's reports/notices-of-no-activity:

2018 D1- Due 10/27/18; notice-of-no-activity filed 02/28/19.

2018 D2- Due 10/28/18; notice-of-no-activity filed 02/08/19.

2018 D3- Due 10/29/18; notice-of-no-activity filed 02/08/19.

2018 D4- Due 10/30/18; notice-of-no-activity filed 02/08/19.

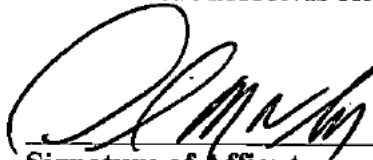
2018 D5- Due 10/31/18; notice-of-no-activity filed 02/08/19.

2018 D6- Due 11/01/18; notice-of-no-activity filed 02/08/19.

2018 G7- Due 11/02/18; notice-of-no-activity filed 02/08/19.

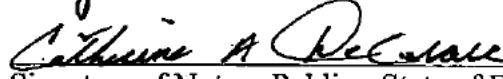
I didn't realize until I had contact with the state that I had to file for these special elections if I was not participating in them. Once it was reviewed with them, the reports were filed.

HEREBY SWEAR OR AFFIRM THAT THE FOREGOING INFORMATION IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.



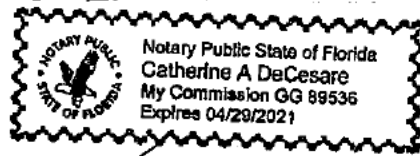
Signature of Affiant

Sworn to (or affirmed) and subscribed before me this 16 day of July, 2019.



Signature of Notary Public - State of Florida

Print, Type, or Stamp Commissioned Name of Notary Public



Personally Known  or Produced Identification

Type of Identification Produced: \_\_\_\_\_

Case Investigator: S.S.

**FLORIDA ELECTIONS COMMISSION**  
**REPORT OF INVESTIGATION**  
**Case No.: FEC 19-075**

**Respondent:** Sunshine State Heritage Political Action Committee Corporation

**Complainant:** Division of Elections

Pursuant to Section 106.25(2), Florida Statutes, on February 11, 2019, the Florida Elections Commission (“Commission”) received information from the Division of Elections (“Division”) that Respondent violated Chapter 106, Florida Statutes. Commission staff, therefore, investigated whether Respondent violated the following statutes:

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

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

**I. Preliminary Information:**

1. Respondent is a political committee registered with the Division.
2. Complainant is the Division of Elections (“Division”).
3. Respondent’s filing officer is Kristi Willis, Chief, Bureau of Election Records.

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

4. I investigated whether Respondent violated this section of the election laws by not notifying the filing officer on the prescribed reporting date that no report would be filed on that date because the political committee had not received funds, made contributions, or expended reportable funds during the following reporting periods: 2018 D1, 2018 D2, 2018 D3, 2018 D4, 2018 D5, 2018 D6, and 2018 G7.

5. On February 25, 2016, David M. Nash filed the Statement of Organization of Political Committee (DS-DE 5 form) and the Appointment of Campaign Treasurer and Designation of Campaign Depository for Political Committees (DS-DE 6 form), indicating he was the chairperson. He named Laura Nash as treasurer. To review the DS-DE 5 and DS-DE 6 forms, refer to Exhibit 1.

6. On March 8, 2016, the Division mailed Respondent a letter acknowledging receipt of the DS-DE 5 and DS-DE 6 forms and informing Mr. Nash that the name of the political committee had been placed on the active committee list as a political committee. To review a copy of the March 8, 2016 acknowledgment letter, refer to Exhibit 2.

7. The 2018 D1 campaign treasurer's report was due on October 27, 2018. On October 29, 2018, the Division mailed Respondent notification that the 2018 D1 campaign treasurer's report had not been filed. To review a copy of the October 29, 2018 notification regarding the 2018 D1 campaign treasurer's report, refer to Exhibit 3.

8. The 2018 D2 campaign treasurer's report was due on October 28, 2018. On October 29, 2018, the Division mailed Respondent notification that the 2018 D2 campaign treasurer's report had not been filed. To review a copy of the October 29, 2018 notification regarding the 2018 D2 campaign treasurer's report, refer to Exhibit 4.

9. The 2018 D3 campaign treasurer's report was due on October 29, 2018. On October 30, 2018, the Division mailed Respondent notification that the 2018 D3 campaign treasurer's report had not been filed. To review a copy of the October 30, 2018 notification regarding the 2018 D3 campaign treasurer's report, refer to Exhibit 5.

10. The 2018 D4 campaign treasurer's report was due on October 30, 2018. On October 31, 2018, the Division mailed Respondent notification that the 2018 D4 campaign treasurer's report had not been filed. To review a copy of the October 31, 2018 notification regarding the 2018 D4 campaign treasurer's report, refer to Exhibit 6.

11. The 2018 D5 campaign treasurer's report was due on October 31, 2018. On November 1, 2018, the Division mailed Respondent notification that the 2018 D5 campaign treasurer's report had not been filed. To review a copy of the November 1, 2018 notification regarding the 2018 D5 campaign treasurer's report, refer to Exhibit 7.

12. The 2018 D6 campaign treasurer's report was due on November 1, 2018. On November 2, 2018, the Division mailed Respondent notification that the 2018 D6 campaign treasurer's report had not been filed. To review a copy of the November 2, 2018 notification regarding the 2018 D6 campaign treasurer's report, refer to Exhibit 8.

13. The 2018 G7 campaign treasurer's report was due on November 2, 2018. On November 3, 2018, the Division mailed Respondent notification that the 2018 G7 campaign treasurer's report had not been filed. To review a copy of the November 3, 2018 notification regarding the 2018 G7 campaign treasurer's report, refer to Exhibit 9.

14. On November 19, 2018, the Division mailed Respondent second notifications that the 2018 D1, 2018 D2, 2018 D3, 2018 D4, 2018 D5, 2018 D6, and 2018 G7 campaign treasurer's reports had not been filed. To review the November 19, 2018 second notifications, refer to Exhibit 10.

15. On December 10, 2018, the Division mailed Respondent final notification with delivery confirmation that the 2018 D1, 2018 D2, 2018 D3, 2018 D4, 2018 D5, 2018 D6, and 2018 G7 campaign treasurer's reports had not been filed. To review the December 10, 2018 final

notification with delivery confirmation, refer to Exhibit 11.

16. Respondent's filing history indicates that all seven notices-of-no-activity were filed on February 8, 2019, as indicated in Table 1 below.

<b>Report</b>	<b>Report Cover Period</b>	<b>Date Notification Due</b>	<b>Date Notification Filed</b>	<b>No. of Days Late</b>
2018 D1	10/20 – 10/26/18	10/27/18	02/08/19	104
2018 D2	10/27 – 10/27/18	10/28/18	02/08/19	103
2018 D3	10/28 – 10/28/18	10/29/18	02/08/19	102
2018 D4	10/29 – 10/29/18	10/30/18	02/08/19	101
2018 D5	10/30 – 10/30/18	10/31/18	02/08/19	100
2018 D6	10/31 – 10/31/18	11/01/18	02/08/19	99
2018 G7	10/20 – 11/01/18	11/02/18	02/08/19	N/A

17. On May 2, 2019, Respondent's bank account records were received as a result of a subpoena to Wells Fargo Bank, Respondent's primary depository listed on the most recent DS-DE 5 and 6 forms filed on February 25, 2016; Exhibit 1. Records indicate that Respondent did not have reportable financial activity during the 2018 D1, 2018 D2, 2018 D3, 2018 D4, 2018 D5 and 2018 D6<sup>1</sup> reporting periods. To review Respondent's bank account records, refer to Exhibit 12.

18. Respondent's bank account records revealed that Respondent had one reportable expenditure that fell within the report cover period for the 2018 G7 reporting period<sup>2</sup>, therefore, a notice-of-no-activity was not appropriate, and a campaign treasurer's report was required to be filed; Exhibit 12.

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

19. I investigated whether Respondent violated this section of the election laws by falsely reporting or deliberately failing to include information in one or more campaign reports.

20. As previously discussed in paragraph 16 and Table 1, Respondent filed notices-of-no-activity for the 2018 D1, 2018 D2, 2018 D3, 2018 D4, 2018 D5, 2018 D6, and 2018 G7 reporting periods.

<sup>1</sup> The 2018 D1 through D6 campaign treasurer's reports need only contain information on all previously unreported contributions received as of the preceding day; however, expenditures can be reported if desired. If expenditures have already been reported during the daily reports, they are not to be duplicated in 2018 G7 campaign treasurer's report.

<sup>2</sup> Respondent had one expenditure on October 31, 2018. Since Respondent did not report this expenditure on the daily report (2018 D6), he was required to report it in the 2018 G7 campaign treasurer's report.



21. As previously discussed in paragraph 18, Respondent's bank account records revealed that there was reportable financial activity that fell within the 2018 G7 reporting period, therefore, a notice-of-no-activity was inappropriate, and a campaign treasurer's report should have been filed.

22. Respondent's bank account records indicate a monthly service fee of \$14.00 was withdrawn from the account on October 31, 2018<sup>3</sup>; Exhibit 12. As noted in footnote 2, Respondent did not report the expenditure in the 2018 D6 daily campaign treasurer's report, thus, it should have been reported in the 2018 G7 campaign treasurer's report.

**IV. FEC History:**

23. Respondent has had many cases in front of the Florida Elections Commission, as indicated in Table 2 below.

<b>TABLE 2: RESPONDENT'S PRIOR CASES BEFORE THE COMMISSION</b>			
<b>Type of Case</b>	<b>Final Agency Action</b>	<b>Fine/Civil Penalty</b>	<b>Fine Paid</b>
Willful (16-480)	Consent Order Violation of Section 106.07(7), Florida Statutes, 1 count	\$50.00	09/18/2018
Willful (16-481)	Consent Order Violation of Section 106.07(7), Florida Statutes, 1 count	\$50.00	09/18/2018
Willful (16-490)	Consent Order Violation of Section 106.07(7), Florida Statutes, 4 counts, and Violation of Section 106.19(1)(c), Florida Statutes, 1 count	\$250.00	09/18/2018
Autofine (16-537)	Default Final Order; fine upheld	\$135.00	Paid
Willful (16-547)	Consent Order Violation of Section 106.07(7), Florida Statutes, 2 counts	\$100.00	06/14/2017
Willful (16-632)	Consent Order Violation of Section 106.19(1)(c), Florida Statutes, 1 count	\$50.00	09/18/2018
Autofine (17-044)	Default Final Order; fine upheld	\$98.75	Paid

<sup>3</sup> Bank account records indicate three check expenditures appearing on the Transaction History as being withdrawn from the account on October 24, 2018, however, these checks were dated October 18, 2018, and correctly reported by Respondent in the 2018 G6 campaign treasurer's report.

Willful (17-061)	Consent Order Violation of Section 106.07(7), Florida Statutes, 2 counts	\$100.00	09/18/2018
Autofine (17-100)	Default Final Order; fine upheld	\$75.00	Paid
Willful (17-405)	Consent Order Violation of Section 106.07(7), Florida Statutes, 14 counts	\$250.00	09/18/2018

**Conclusion:**

24. Respondent was offered an opportunity to make comments regarding the referral and investigation, however, Respondent's chairman did not complete and return a questionnaire-affidavit that was mailed on June 11, 2019, and I was unable to reach Respondent's chairman by telephone.

25. In the March 8, 2016 acknowledgment letter, Respondent was informed that all of the Division's publications were available online at the Division's website. In the letter, Respondent was admonished as follows: **It is your responsibility to read, understand, and follow the requirements of Florida's election laws. Therefore, please print a copy of the following documents: Chapter 106, Florida Statutes, *Political Committee Handbook*, *Calendar of Reporting Dates*, and Rule 1S-2.017, Florida Administrative Code; Exhibit 2.**

Respectfully submitted on July 10, 2019.




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Samantha Spore  
Investigation Specialist

**Current address of Respondent**

Sunshine State Heritage PAC Corporation  
19800 Southwest 14<sup>th</sup> Court  
Pembroke Pines, FL 33029

**Current address of Complainant**

Division of Elections  
500 South Bronough Street, Room 316  
Tallahassee, Florida 32399-0250

**Name and Address of Filing Officer:**

Ms. Kristi Willis  
Bureau of Election Records  
500 South Bronough Street, Room 316  
Tallahassee, Florida 32399-0250

**Chair of Committee**

Mr. David M. Nash  
Sunshine State Heritage PAC Corporation  
19800 Southwest 14<sup>th</sup> Court  
Pembroke Pines, FL 33029

Copy furnished to:

Mr. David Flagg, Investigations Manager

**FLORIDA ELECTIONS COMMISSION**  
**REPORT OF INVESTIGATION**  
**Sunshine State Heritage PAC Corporation -- FEC 19-075**

<b>LIST OF EXHIBITS</b>	
<b>Exhibits #s</b>	<b>Description of Exhibits</b>
Exhibit 1	DS-DE 5 and DS-DE 6 Forms
Exhibit 2	March 8, 2016 Acknowledgment Letter
Exhibit 3	October 29, 2018 Notification regarding the 2018 D1 CTR
Exhibit 4	October 29, 2018 Notification regarding the 2018 D2 CTR
Exhibit 5	October 30, 2018 Notification regarding the 2018 D3 CTR
Exhibit 6	October 31, 2018 Notification regarding the 2018 D4 CTR
Exhibit 7	November 1, 2018 Notification regarding the 2018 D5 CTR
Exhibit 8	November 2, 2018 Notification regarding the 2018 D6 CTR
Exhibit 9	November 3, 2018 Notification regarding the 2018 G7 CTR
Exhibit 10	November 19, 2018 Second Notifications
Exhibit 11	December 10, 2018 Final Notifications with Delivery Confirmation
Exhibit 12	Respondent's Bank Account Records

**STATEMENT OF ORGANIZATION  
OF POLITICAL COMMITTEE**

(PLEASE TYPE)

OFFICE USE ONLY

RECEIVED  
STATE OF FLORIDA

2016 FEB 16 AM 9:28

COMMISSION OF ELECTIONS  
TALLAHASSEE, FL

**1. Full Name of Committee**

Sunshine State Heritage Political Action Committee Corporation

**Telephone**

954-614-2542

**Mailing Address (include city, state and zip code)**

PO Box 816451  
Hollywood, Florida 33081-6451

**Street Address (include city, state and zip code)**

5701 Taylor Street  
Hollywood, Florida 33021

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

Name of Affiliated or Connected Organization	Mailing Address	Relationship
None		

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

The scope of our Committee is the preservation of our heritage and historical sites, battlefields, grave markers, statues and flags. This includes legislative bills and electing officials with the same views.

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

**Heritage**

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

Full Name	Mailing Address	Committee Title or Position
David M Nash	5701 Taylor St., Hollywood, FL 33021	Chairman/Deputy Treasurer
Brian Turner	PO Box 81645, Hollywood, FL 33081-6451	Vice Chairman/2nd Deputy Treasurer
Laura Nash	1020 SW 109 Ave., Pembroke Pines, FL 33025	Treasurer

**6. List by Name, Address and Position, Other Principal Officers, Including Officers and Members of the Finance Committee, If Any (include chairman's name)**

Full Name	Mailing Address	Committee Title or Position
David M. Nash Brian Turner	5701 Taylor St., Hollywood, FL 33021 PO Box 81645, Hollywood, FL 33081-6451	Chairman/Deputy Treasurer Vice Chairman/2nd Deputy Treasurer
Laura Nash	1020 SW 109 Ave., Pembroke Pines, FL 33025	Treasurer

**7. List by Name, Address, Office Sought and Party Affiliation Each Candidate or Other Individual that this Committee is Supporting (if none, please indicate)**

Full Name	Mailing Address	Office Sought	Party
None at this time			

**8. List Any Issues this Committee is Supporting:** Issues supported are pro state heritage and historical issues. We oppose issues that are anti state heritage and historical issues. This is a continuing committee.  
**List Any Issues this Committee is Opposing:**

**9. If this Committee is Supporting the Entire Ticket of a Party, Give Name of Party**  
 None

**10. In the Event of Dissolution, What Disposition will be Made of Residual Funds?**  
 Money will be donated to an agreed upon charity.

**11. List all Banks, Safety Deposit Boxes, or Other Depositories Used for Committee Funds**

Name of Bank or Depository & Account Number	Mailing Address
Wells Fargo [REDACTED]	4100 Hollywood Blvd. Hollywood, Florida 33021

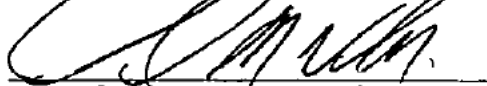
**12. List all Reports Required to be Filed by this Committee with Federal Officials and the Names, Addresses and Positions of Such Officials, If Any**

Report Title	Dates Required to be Filed	Name & Position of Official	Mailing Address
1120POL 990	3-15-17 5-15-17 If required	IRS IRS	

STATE OF Florida Broward COUNTY

I, David M. Nash, certify that the information in this Statement of

Organization is complete, true and correct.

**X**   
 Signature of Chairman of Political Committee 2-4-2016  
Date

**STATEMENT OF ORGANIZATION  
OF POLITICAL COMMITTEE**

(PLEASE TYPE)

OFFICE USE ONLY

2016 FEB 25 AM 9:24

<b>1. Full Name of Committee</b> Sunshine State Heritage Political Action Committee Corporation	Telephone 954-614-2542
--	---------------------------

Mailing Address (include city, state and zip code)  
PO Box 816451  
Hollywood, Florida 33081-6451

Street Address (include city, state and zip code)  
5701 Taylor Street  
Hollywood, Florida 33021

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

Name of Affiliated or Connected Organization	Mailing Address	Relationship
None		

**3. Area, Scope and Jurisdiction of the Committee**  
The scope of our Committee is the supporting of candidates at the state and local levels that support our views and issues at the state level.

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

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

Full Name	Mailing Address	Committee Title or Position
David M Nash	5701 Taylor St., Hollywood, Fl 33021	Chairman/Deputy Treasurer
Brian Turner	PO Box 81645, Hollywood, FL 33081-6451	Vice Chairman/2nd Deputy Treasurer
Laura Nash	1020 SW 109 Ave., Pembroke Pines, Fl 33025	Treasurer

**6. List by Name, Address and Position, Other Principal Officers, Including Officers and Members of the Finance Committee, if Any (include chairman's name)**

Full Name	Mailing Address	Committee Title or Position
David M. Nash Brian Turner	5701 Taylor St., Hollywood, FL 33021 PO Box 81645, Hollywood, FL 33081-6451	Chairman/Deputy Treasurer Vice Chairman/2nd Deputy Treasurer
Laura Nash	1020 SW 109 Ave., Pembroke Pines, FL 33025	Treasurer Treasurer

**7. List by Name, Address, Office Sought and Party Affiliation Each Candidate or Other Individual that this Committee is Supporting (if none, please indicate)**

Full Name	Mailing Address	Office Sought	Party
None at this time			

**8. List Any Issues this Committee is Supporting:** TBD  
**List Any Issues this Committee is Opposing:** TBD

**9. If this Committee is Supporting the Entire Ticket of a Party, Give Name of Party**  
None

**10. In the Event of Dissolution, What Disposition will be Made of Residual Funds?**  
Money will be donated to an agreed upon charity.

**11. List all Banks, Safety Deposit Boxes, or Other Depositories Used for Committee Funds**

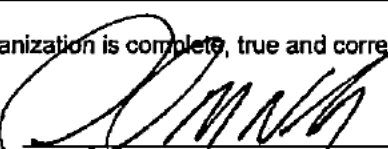
Name of Bank or Depository & Account Number	Mailing Address
Wells Fargo [REDACTED]	4100 Hollywood Blvd. Hollywood, Florida 33021

**12. List all Reports Required to be Filed by this Committee with Federal Officials and the Names, Addresses and Positions of Such Officials, if Any**

Report Title	Dates Required to be Filed	Name & Position of Official	Mailing Address
1120POL 990	3-15-17 5-15-17 If required	IRS IRS	

STATE OF Florida Broward COUNTY

I, David M. Nash, certify that the information in this Statement of Organization is complete, true and correct.

**X**   
Signature of Chairman of Political Committee

2-4-2016  
Date




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

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2016 FEB 16 AM 9:28  
DIVISION OF ELECTIONS  
TALLAHASSEE, FL

CHECK APPROPRIATE BOX:

OFFICE USE ONLY

Original Appointment of Treasurer       Reappointment of Treasurer       Deputy Treasurer

1. Committee or Organization <b>Sunshine State Heritage Political Action Committee Corporation</b>		2. Telephone (954 ) 614-2542	
3. Name of Treasurer or Deputy Treasurer <b>Laura Nash</b>		4. Email (optional) david.nash@shunsinestateheritagepac.org	
5. Telephone (optional) (   )			
6. Mailing Address <b>PO Box 816451 Hollywood, Florida 33081-6451</b>			
7. Street Address <b>5701 Taylor Street, Hollywood, Florida 33021</b>			
8. The following bank has been designated as the <input checked="" type="checkbox"/> Primary Depository <input type="checkbox"/> Secondary Depository			
9. Name of Bank <b>Wells Fargo</b>		10. Street Address <b>4100 Hollywood Blvd.</b>	
11. City <b>Hollywood</b>		12. State <b>Florida</b>	13. Zip Code <b>33021</b>
14. Signature of Chairman <b>X</b> 		15. Name of Chairman (Print or Type) <b>David M. Nash</b>	

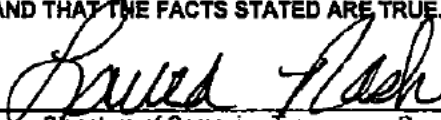
**Campaign Treasurer's Acceptance of Appointment**

I, Laura Nash, do hereby accept the appointment as  
(Please Print or Type)  
treasurer or deputy treasurer for Sunshine State Heritage Political Action Committee Corporation  
(Committee or Organization)

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

2-4-2016

Date

**X**   
Signature of Campaign Treasurer or Deputy Treasurer

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

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DIVISION OF ELECTIONS  
TALLAHASSEE, FL

CHECK APPROPRIATE BOX:

OFFICE USE ONLY

Original Appointment of Treasurer       Reappointment of Treasurer       Deputy Treasurer

1. Committee or Organization Sunshine State Heritage Political Action Committee Corporation		2. Telephone (954 ) 614-2542
3. Name of Treasurer or Deputy Treasurer David M. Nash	4. Email (optional) david.nash@shunsinestateheritagepac.org	5. Telephone (optional) ( )

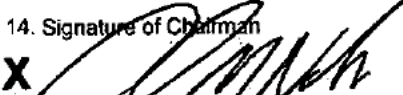
6. Mailing Address  
PO Box 816451 Hollywood, Florida 33081-6451

7. Street Address  
5701 Taylor Street, Hollywood, Florida 33021

8. The following bank has been designated as the  Primary Depository       Secondary Depository

9. Name of Bank Wells Fargo	10. Street Address 4100 Hollywood Blvd.
--------------------------------	--

11. City Hollywood	12. State Florida	13. Zip Code 33021
-----------------------	----------------------	-----------------------

14. Signature of Chairman 	15. Name of Chairman (Print or Type) David M. Nash
--	---

**Campaign Treasurer's Acceptance of Appointment**

I, David M. Nash, do hereby accept the appointment as  
(Please Print or Type)  
treasurer or deputy treasurer for Sunshine State Heritage Political Action Committee Corporation  
(Committee or Organization)

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

2-4-2016        
Date      Signature of Campaign Treasurer or Deputy Treasurer

**APPOINTMENT OF CAMPAIGN TREASURER  
AND DESIGNATION OF CAMPAIGN  
DEPOSITORY FOR  
POLITICAL COMMITTEES**  
(Sections 108.011(1) and 108.021(1), F.S.)

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DIVISION OF ELECTIONS  
TALLAHASSEE, FL

CHECK APPROPRIATE BOX:

OFFICE USE ONLY

Original Appointment of Treasurer       Reappointment of Treasurer       Deputy Treasurer

1. Committee or Organization Sunshine State Heritage Political Action Committee Corporation		2. Telephone (954 ) 614-2542	
3. Name of Treasurer or Deputy Treasurer Brian Turner		4. Email (optional) brian.turner@shunsinestateheritagepac.org	
5. Telephone (optional) ( )			
6. Mailing Address PO Box 816451 Hollywood, Florida 33081-6451			
7. Street Address 5701 Taylor Street, Hollywood, Florida 33021			
8. The following bank has been designated as the <input checked="" type="checkbox"/> Primary Depository <input type="checkbox"/> Secondary Depository			
9. Name of Bank Wells Fargo		10. Street Address 4100 Hollywood Blvd.	
11. City Hollywood		12. State Florida	13. Zip Code 33021
14. Signature of Chairman 		15. Name of Chairman (Print or Type) David M. Nash	

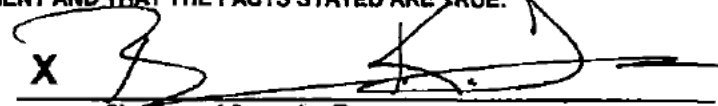
**Campaign Treasurer's Acceptance of Appointment**

I, Brian Turner, do hereby accept the appointment as  
(Please Print or Type)  
treasurer or deputy treasurer for Sunshine State Heritage Political Action Committee Corporation  
(Committee or Organization)

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

2-4-2016

Date



Signature of Campaign Treasurer or Deputy Treasurer



**FLORIDA DEPARTMENT of STATE**

**RICK SCOTT**  
Governor

**KEN DETZNER**  
Secretary of State

March 8, 2016

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451  
Hollywood, Florida 330816451

Dear Mr. Nash:

This will acknowledge receipt of the Statement of Organization and Appointment of Campaign Treasurer and Designation of Campaign Depository for **Sunshine State Heritage Political Action Committee Corporation**, which were placed on file in our office on February 25, 2016. This information appears to comply with the requirements of Section 106.03, Florida Statutes, and the name of this organization has been placed on our active committee list as a political committee.

**Campaign Treasurer's Reports**

Your first campaign treasurer's report will be due on **March 10, 2016**. The report will cover the period of February 1-29, 2016 (M2). All political committees that file reports with the Division of Elections are required to file by means of the Division's Electronic Filing System (EFS).

**Credentials and Sign-ons**

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

**EFS Website Address:** <https://efs.dos.state.fl.us>  
**Identification Number:** 65314

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



**EXHIBIT 2 page 1 of 3**

David M. Nash , Chairperson  
March 8, 2016  
Page Two

### Pin Numbers

Pin numbers are confidential secure credentials that allow you to submit reports and update information. The enclosed sealed envelope provides a confidential pin number for the chairperson. By copy of this letter, confidential pin numbers to access the EFS were sent to the treasurer and deputy treasurer.

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

### Timely Filing

All reports must be completed and filed through the EFS no later than midnight, Eastern Standard Time, of the due date. Reports not filed by midnight of the due date are late filed and subject to the penalties in Section 106.07(8), Florida Statutes. In the event that the EFS is inoperable on the due date, the report will be accepted as timely filed if filed no later than midnight, Eastern Standard Time, of the first business day the EFS becomes operable. No fine will be levied during the period the EFS was inoperable.

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

### Electronic Receipts

The person submitting the report on the EFS will be issued an electronic receipt indicating and verifying the report was filed. Each campaign treasurer's report filed by means of the EFS is considered to be under oath by the chairperson and campaign treasurer and such persons are subject to the provisions of Section 106.07(5), Florida Statutes.

David M. Nash, Chairperson  
March 8, 2016  
Page Three

**Instructions and Assistance**

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

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

Please let me know if you need additional information.

Sincerely,



Kristi Reid Bronson, Chief  
Bureau of Election Records

KRB/ljr

Enclosures

pc: Laura Nash, Treasurer  
Brian Turner, Deputy Treasurer



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

October 29, 2018

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451  
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

Our records indicate that you have not filed either your campaign treasurer's report or notification that no reportable activity occurred, whichever is applicable. The filing date was October 27, 2018.

The law (s. 106.07(8)(b), Fla. Stat.) requires the filing officer to immediately notify you about the missed filing date and the automatic fines that will be assessed for late filing of a report, if a report was due.

- If reportable activity occurred and you have not filed a report, statutory fines are automatically assessed as follows until you file your report:
  - \$50 per day for the first 3 days late
  - \$500 per day for each day after the 3rd day late
  - If the required report immediately precedes a primary and general election, the automatic fine is \$500 for each late day.

The total fine for the untimely report cannot exceed 25% of the total receipts or expenditures, whichever is greater, for the cover period. Even if you end up filing your report late, we cannot waive the statutory fines. We will notify you of the specific amount of fines owed once you file your report. You have 20 days from the day you receive the notice to pay the fine or to appeal the fine to the Florida Elections Commission.

- If no reportable activity occurred for the report date(s), you are still required to notify us in writing, via the Division's Electronic Filing System, that no reportable activity occurred. No automatic fines are statutorily assessed.

However, in all cases, failure to file and/or untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer

EXHIBIT 3



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

October 29, 2018

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451  
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

Our records indicate that you have not filed either your campaign treasurer's report or notification that no reportable activity occurred, whichever is applicable. The filing date was October 28, 2018.

The law (s. 106.07(8)(b), Fla. Stat.) requires the filing officer to immediately notify you about the missed filing date and the automatic fines that will be assessed for late filing of a report, if a report was due.

- If reportable activity occurred and you have not filed a report, statutory fines are automatically assessed as follows until you file your report:
  - \$50 per day for the first 3 days late
  - \$500 per day for each day after the 3rd day late
  - If the required report immediately precedes a primary and general election, the automatic fine is \$500 for each late day.

The total fine for the untimely report cannot exceed 25% of the total receipts or expenditures, whichever is greater, for the cover period. Even if you end up filing your report late, we cannot waive the statutory fines. We will notify you of the specific amount of fines owed once you file your report. You have 20 days from the day you receive the notice to pay the fine or to appeal the fine to the Florida Elections Commission.

- If no reportable activity occurred for the report date(s), you are still required to notify us in writing, via the Division's Electronic Filing System, that no reportable activity occurred. No automatic fines are statutorily assessed.

However, in all cases, failure to file and/or untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer

EXHIBIT

4





FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

October 30, 2018

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451  
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

Our records indicate that you have not filed either your campaign treasurer's report or notification that no reportable activity occurred, whichever is applicable. The filing date was October 29, 2018.

The law (s. 106.07(8)(b), Fla. Stat.) requires the filing officer to immediately notify you about the missed filing date and the automatic fines that will be assessed for late filing of a report, if a report was due.

- If reportable activity occurred and you have not filed a report, statutory fines are automatically assessed as follows until you file your report:
  - \$50 per day for the first 3 days late
  - \$500 per day for each day after the 3rd day late
  - If the required report immediately precedes a primary and general election, the automatic fine is \$500 for each late day.

The total fine for the untimely report cannot exceed 25% of the total receipts or expenditures, whichever is greater, for the cover period. Even if you end up filing your report late, we cannot waive the statutory fines. We will notify you of the specific amount of fines owed once you file your report. You have 20 days from the day you receive the notice to pay the fine or to appeal the fine to the Florida Elections Commission.

- If no reportable activity occurred for the report date(s), you are still required to notify us in writing, via the Division's Electronic Filing System, that no reportable activity occurred. No automatic fines are statutorily assessed.

However, in all cases, failure to file and/or untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer

EXHIBIT

5



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

October 31, 2018

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451  
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

Our records indicate that you have not filed either your campaign treasurer's report or notification that no reportable activity occurred, whichever is applicable. The filing date was October 30, 2018.

The law (s. 106.07(8)(b), Fla. Stat.) requires the filing officer to immediately notify you about the missed filing date and the automatic fines that will be assessed for late filing of a report, if a report was due.

- If reportable activity occurred and you have not filed a report, statutory fines are automatically assessed as follows until you file your report:
  - \$50 per day for the first 3 days late
  - \$500 per day for each day after the 3rd day late
  - If the required report immediately precedes a primary and general election, the automatic fine is \$500 for each late day.

The total fine for the untimely report cannot exceed 25% of the total receipts or expenditures, whichever is greater, for the cover period. Even if you end up filing your report late, we cannot waive the statutory fines. We will notify you of the specific amount of fines owed once you file your report. You have 20 days from the day you receive the notice to pay the fine or to appeal the fine to the Florida Elections Commission.

- If no reportable activity occurred for the report date(s), you are still required to notify us in writing, via the Division's Electronic Filing System, that no reportable activity occurred. No automatic fines are statutorily assessed.

However, in all cases, failure to file and/or untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer

EXHIBIT

6



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

November 1, 2018

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451  
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

Our records indicate that you have not filed either your campaign treasurer's report or notification that no reportable activity occurred, whichever is applicable. The filing date was October 31, 2018.

The law (s. 106.07(8)(b), Fla. Stat.) requires the filing officer to immediately notify you about the missed filing date and the automatic fines that will be assessed for late filing of a report, if a report was due.

- If reportable activity occurred and you have not filed a report, statutory fines are automatically assessed as follows until you file your report:
  - \$50 per day for the first 3 days late
  - \$500 per day for each day after the 3rd day late
  - If the required report immediately precedes a primary and general election, the automatic fine is \$500 for each late day.

The total fine for the untimely report cannot exceed 25% of the total receipts or expenditures, whichever is greater, for the cover period. Even if you end up filing your report late, we cannot waive the statutory fines. We will notify you of the specific amount of fines owed once you file your report. You have 20 days from the day you receive the notice to pay the fine or to appeal the fine to the Florida Elections Commission.

- If no reportable activity occurred for the report date(s), you are still required to notify us in writing, via the Division's Electronic Filing System, that no reportable activity occurred. No automatic fines are statutorily assessed.

However, in all cases, failure to file and/or untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer

EXHIBIT

7



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

November 2, 2018

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451  
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

Our records indicate that you have not filed either your campaign treasurer's report or notification that no reportable activity occurred, whichever is applicable. The filing date was November 1, 2018.

The law (s. 106.07(8)(b), Fla. Stat.) requires the filing officer to immediately notify you about the missed filing date and the automatic fines that will be assessed for late filing of a report, if a report was due.

- If reportable activity occurred and you have not filed a report, statutory fines are automatically assessed as follows until you file your report:
  - \$50 per day for the first 3 days late
  - \$500 per day for each day after the 3rd day late
  - If the required report immediately precedes a primary and general election, the automatic fine is \$500 for each late day.

The total fine for the untimely report cannot exceed 25% of the total receipts or expenditures, whichever is greater, for the cover period. Even if you end up filing your report late, we cannot waive the statutory fines. We will notify you of the specific amount of fines owed once you file your report. You have 20 days from the day you receive the notice to pay the fine or to appeal the fine to the Florida Elections Commission.

- If no reportable activity occurred for the report date(s), you are still required to notify us in writing, via the Division's Electronic Filing System, that no reportable activity occurred. No automatic fines are statutorily assessed.

However, in all cases, failure to file and/or untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer

EXHIBIT 8



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

November 3, 2018

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451  
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

Our records indicate that you have not filed either your campaign treasurer's report or notification that no reportable activity occurred, whichever is applicable. The filing date was November 2, 2018.

The law (s. 106.07(8)(b), Fla. Stat.) requires the filing officer to immediately notify you about the missed filing date and the automatic fines that will be assessed for late filing of a report, if a report was due.

- If reportable activity occurred and you have not filed a report, statutory fines are automatically assessed as follows until you file your report:
  - \$50 per day for the first 3 days late
  - \$500 per day for each day after the 3rd day late
  - If the required report immediately precedes a primary and general election, the automatic fine is \$500 for each late day.

The total fine for the untimely report cannot exceed 25% of the total receipts or expenditures, whichever is greater, for the cover period. Even if you end up filing your report late, we cannot waive the statutory fines. We will notify you of the specific amount of fines owed once you file your report. You have 20 days from the day you receive the notice to pay the fine or to appeal the fine to the Florida Elections Commission.

- If no reportable activity occurred for the report date(s), you are still required to notify us in writing, via the Division's Electronic Filing System, that no reportable activity occurred. No automatic fines are statutorily assessed.

However, in all cases, failure to file and/or untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer

EXHIBIT

9



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

**Second Notice**

November 19, 2018

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451  
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

Our records indicate that you have not filed either your campaign treasurer's report or notification that no reportable activity occurred, whichever is applicable. The filing date was October 28, 2018.

We mailed, via regular mail, the first notice of the failure to file the above-mentioned report or notification to the address on file with our office on October 29, 2018.

The first notice which we provided to you specifically explained the automatic fine provisions in the law (s. 106.07(8)(b), Fla. Stat.) for failure to file a required report. Such fines are continuing to accrue for a late-filed report. Also, that notice explained that if no reportable activity occurred for the report date(s), you are still required to provide notification in writing that no reportable activity occurred. Our initial notice further indicated that, in all cases, failure to file and/or untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer

EXHIBIT 10 page 1 of 7



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

**Second Notice**

November 19, 2018

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451  
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:


Our records indicate that you have not filed either your campaign treasurer's report or notification that no reportable activity occurred, whichever is applicable. The filing date was October 29, 2018.

We mailed, via regular mail, the first notice of the failure to file the above-mentioned report or notification to the address on file with our office on October 30, 2018.

The first notice which we provided to you specifically explained the automatic fine provisions in the law (s. 106.07(8)(b), Fla. Stat.) for failure to file a required report. Such fines are continuing to accrue for a late-filed report. Also, that notice explained that if no reportable activity occurred for the report date(s), you are still required to provide notification in writing that no reportable activity occurred. Our initial notice further indicated that, in all cases, failure to file and/or untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

  
Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer

**EXHIBIT 10 page 2 of 7**



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

**Second Notice**

November 19, 2018

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451  
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:


Our records indicate that you have not filed either your campaign treasurer's report or notification that no reportable activity occurred, whichever is applicable. The filing date was October 30, 2018.

We mailed, via regular mail, the first notice of the failure to file the above-mentioned report or notification to the address on file with our office on October 31, 2018.

The first notice which we provided to you specifically explained the automatic fine provisions in the law (s. 106.07(8)(b), Fla. Stat.) for failure to file a required report. Such fines are continuing to accrue for a late-filed report. Also, that notice explained that if no reportable activity occurred for the report date(s), you are still required to provide notification in writing that no reportable activity occurred. Our initial notice further indicated that, in all cases, failure to file and/or untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

  
Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer

EXHIBIT 10 page 3 of 7





FLORIDA DEPARTMENT OF STATE

**Ken Detzner**

Secretary of State

DIVISION OF ELECTIONS

**Second Notice**

November 19, 2018

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451  
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

Our records indicate that you have not filed either your campaign treasurer's report or notification that no reportable activity occurred, whichever is applicable. The filing date was October 31, 2018.

We mailed, via regular mail, the first notice of the failure to file the above-mentioned report or notification to the address on file with our office on November 1, 2018.

The first notice which we provided to you specifically explained the automatic fine provisions in the law (s. 106.07(8)(b), Fla. Stat.) for failure to file a required report. Such fines are continuing to accrue for a late-filed report. Also, that notice explained that if no reportable activity occurred for the report date(s), you are still required to provide notification in writing that no reportable activity occurred. Our initial notice further indicated that, in all cases, failure to file and/or untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer

EXHIBIT 10 page 4 of 7



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

**Second Notice**

November 19, 2018

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451.  
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

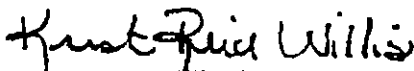
Our records indicate that you have not filed either your campaign treasurer's report or notification that no reportable activity occurred, whichever is applicable. The filing date was October 27, 2018.

We mailed, via regular mail, the first notice of the failure to file the above-mentioned report or notification to the address on file with our office on October 29, 2018.

The first notice which we provided to you specifically explained the automatic fine provisions in the law (s. 106.07(8)(b), Fla. Stat.) for failure to file a required report. Such fines are continuing to accrue for a late-filed report. Also, that notice explained that if no reportable activity occurred for the report date(s), you are still required to provide notification in writing that no reportable activity occurred. Our initial notice further indicated that, in all cases, failure to file and/or untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

  
Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer

EXHIBIT 10 page 5 of 7



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

Second Notice

November 19, 2018

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451  
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

Our records indicate that you have not filed either your campaign treasurer's report or notification that no reportable activity occurred, whichever is applicable. The filing date was November 2, 2018.

We mailed, via regular mail, the first notice of the failure to file the above-mentioned report or notification to the address on file with our office on November 3, 2018.

The first notice which we provided to you specifically explained the automatic fine provisions in the law (s. 106.07(8)(b), Fla. Stat.) for failure to file a required report. Such fines are continuing to accrue for a late-filed report. Also, that notice explained that if no reportable activity occurred for the report date(s), you are still required to provide notification in writing that no reportable activity occurred. Our initial notice further indicated that, in all cases, failure to file and/or untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer

EXHIBIT 10 page 6 of 7



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

**Second Notice**

November 19, 2018

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451  
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

Our records indicate that you have not filed either your campaign treasurer's report or notification that no reportable activity occurred, whichever is applicable. The filing date was November 1, 2018.

We mailed, via regular mail, the first notice of the failure to file the above-mentioned report or notification to the address on file with our office on November 2, 2018.

The first notice which we provided to you specifically explained the automatic fine provisions in the law (s. 106.07(8)(b), Fla. Stat.) for failure to file a required report. Such fines are continuing to accrue for a late-filed report. Also, that notice explained that if no reportable activity occurred for the report date(s), you are still required to provide notification in writing that no reportable activity occurred. Our initial notice further indicated that, in all cases, failure to file and/or untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

  
Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer

EXHIBIT 10 page 7 of 7



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

Final Notice

Delivery Confirmation:

USPS TRACKING # 9114 9014 9845 1416 2497 25  
& CUSTOMER RECEIPT For Tracking or inquiries go to USPS.com  
or call 1-800-222-1811

December 10, 2018

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451  
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

A recent review of the Division's records show that the Division has not yet received the below-referenced campaign treasurer's report or the required notification that no reportable activity occurred, whichever is applicable, during the following cover period:

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2018	D1	10/20/18 - 10/26/18

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

As we stated in the prior notices, even if you now file the report or notification, the untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer

EXHIBIT 1.1 page 1 of 8



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice**

**Delivery Confirmation: 9114 9014 9645 1416 2497 25**

December 10, 2018

David M. Nash, Chairperson

Sunshine State Heritage Political Action Committee Corporation

PAC 65314

Post Office Box 816451

Hollywood, FL 33021-3021

Dear Mr. Nash:

A recent review of the Division's records show that the Division has not yet received the below-referenced campaign treasurer's report or the required notification that no reportable activity occurred, whichever is applicable, during the following cover period:

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2018	D2	10/27/18 - 10/27/18

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

As we stated in the prior notices, even if you now file the report or notification, the untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice**

**Delivery Confirmation: 9114 9014 9645 1416 2497 25**

December 10, 2018

David M. Nash, Chairperson

Sunshine State Heritage Political Action Committee Corporation

PAC 65314

Post Office Box 816451

Hollywood, FL 33021-3021

Dear Mr. Nash:

A recent review of the Division's records show that the Division has not yet received the below-referenced campaign treasurer's report or the required notification that no reportable activity occurred, whichever is applicable, during the following cover period:

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2018	D3	10/28/18 - 10/28/18

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

As we stated in the prior notices, even if you now file the report or notification, the untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

Final Notice

Delivery Confirmation: 9114 9014 9645 1416 2497 25

December 10, 2018

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451  
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

A recent review of the Division's records show that the Division has not yet received the below-referenced campaign treasurer's report or the required notification that no reportable activity occurred, whichever is applicable, during the following cover period:

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2018	D4	10/29/18 - 10/29/18

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

As we stated in the prior notices, even if you now file the report or notification, the untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer

EXHIBIT 11 page 4 of 8





FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice**

**Delivery Confirmation: 9114 9014 9645 1416 2497 25**

December 10, 2018

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451  
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

A recent review of the Division's records show that the Division has not yet received the below-referenced campaign treasurer's report or the required notification that no reportable activity occurred, whichever is applicable, during the following cover period:

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2018	D5	10/30/18 - 10/30/18

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

As we stated in the prior notices, even if you now file the report or notification, the untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

  
Krist Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

Final Notice

Secretary Commission: 7114 7014 9045 1416 2497 25

December 10, 2018

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451  
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

A recent review of the Division's records show that the Division has not yet received the below-referenced campaign treasurer's report or the required notification that no reportable activity occurred, whichever is applicable, during the following cover period:

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2018	D6	10/31/18 - 10/31/18

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

As we stated in the prior notices, even if you now file the report or notification, the untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer

EXHIBIT 11 page 6 of 8



FLORIDA DEPARTMENT OF STATE  
**Ken Detzner**  
 Secretary of State  
 DIVISION OF ELECTIONS

**Final Notice**  
**Delivery Confirmation: 9114 9014 9645 1416 2497 25**

December 10, 2018

David M. Nash, Chairperson  
 Sunshine State Heritage Political Action Committee Corporation  
 Post Office Box 816451  
 Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

A recent review of the Division's records show that the Division has not yet received the below-referenced campaign treasurer's report or the required notification that no reportable activity occurred, whichever is applicable, during the following cover period:

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2018	G7	10/20/18 - 11/1/18

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

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

Sincerely,

*Kristi Reid Willis*

Kristi Reid Willis, Chief  
 Bureau of Election Records

cc: Laura Nash, Treasurer

EXHIBIT 11 page 7 of 8



FAQs > (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

### Track Another Package +

Tracking Number: 9114901496451416249725

Remove X

Your item has been delivered and is available at a PO Box at 9:22 pm on December 19, 2018 in HOLLYWOOD, FL 33081.

**Delivered**

December 19, 2018 at 9:22 pm  
Delivered, PO Box  
HOLLYWOOD, FL 33081

Feedback

Tracking History



Product Information



See Less ^

## Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

FAQs (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

EXHIBIT 11 page 8 of 8

Primary account number: [REDACTED] ■ November 1, 2018 - November 30, 2018 ■ Page 2 of 5



## Wells Fargo Business Choice Checking

### Activity summary

Beginning balance on 11/1	\$853.21
Deposits/Credits	94.11
Withdrawals/Debits	- 39.00
<b>Ending balance on 11/30</b>	<b>\$908.32</b>
Average ledger balance this period	\$913.49

Account number: [REDACTED]  
**SUNSHINE STATE HERITAGE PAC CORPORATION**

*Florida account terms and conditions apply*

For Direct Deposit use  
 Routing Number (RTN): 063107513

For Wire Transfers use  
 Routing Number (RTN): 121000248

### Overdraft Protection

Your account is linked to the following for Overdraft Protection:

- Savings - [REDACTED]

### Transaction history

Date	Check Number	Description	Deposits/ Credits	Withdrawals/ Debits	Ending daily balance
11/7		Merchant Service Sunshinest 14739081 Sunshine State Heritag	94.11		947.32
11/13		Recurring Transfer to Sunshine State Heritage PAC Business Market Rate Savings Ref #Op05D6J68G xxxxxx0616		25.00	922.32
11/30		Monthly Service Fee		14.00	908.32
<b>Ending balance on 11/30</b>					<b>908.32</b>
<b>Totals</b>			<b>\$94.11</b>	<b>\$39.00</b>	

*The Ending Daily Balance does not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when your transactions posted. If you had insufficient available funds when a transaction posted, fees may have been assessed.*

### Monthly service fee summary

For a complete list of fees and detailed account information, see the Wells Fargo Account Fee and Information Schedule and Account Agreement applicable to your account (EasyPay Card Terms and Conditions for prepaid cards) or talk to a banker. Go to [wellsfargo.com/feefaq](http://wellsfargo.com/feefaq) for a link to these documents, and answers to common monthly service fee questions.

Fee period 11/01/2018 - 11/30/2018	Standard monthly service fee \$14.00	You paid \$14.00
<b>How to avoid the monthly service fee</b>	Minimum required	This fee period
Have any ONE of the following account requirements		
• Average ledger balance	\$7,500.00	\$913.00 <input type="checkbox"/>
• A qualifying transaction from a linked Wells Fargo Business Payroll Services account	1	0 <input type="checkbox"/>
• A qualifying transaction from a linked Wells Fargo Merchant Services account	1	0 <input type="checkbox"/>
• Total number of posted Wells Fargo Debit Card purchases and/or payments	10	0 <input type="checkbox"/>
• Enrollment in a linked Direct Pay service through Wells Fargo Business Online	1	0 <input type="checkbox"/>
• Combined balances in linked accounts, which may include	\$10,000.00	<input type="checkbox"/>
- Average ledger balances in business checking, savings, and time accounts		
- Most recent statement balance in eligible Wells Fargo business credit cards and lines of credit, and combined average daily balances from the previous month in eligible Wells Fargo business and commercial loans and lines of credit		
- For complete details on how you can avoid the monthly service fee based on your combined balances please refer to page 7 of the Business Account Fee and Information Schedule at <a href="http://www.wellsfargo.com/biz/fcc-information">www.wellsfargo.com/biz/fcc-information</a>		

WXKMX

EXHIBIT 12 page 1 of 4

Primary account number: [REDACTED] ■ November 1, 2018 - November 30, 2018 ■ Page 3 of 5



**Account transaction fees summary**

Service charge description	Units used	Units included	Excess units	Service charge per excess units (\$)	Total service charge (\$)
Cash Deposited (\$)	0	7,500	0	0.0030	0.00
Transactions	1	200	0	0.50	0.00
<b>Total service charges</b>					<b>\$0.00</b>

**Business Market Rate Savings**

**Activity summary**

Beginning balance on 11/1	\$125.08
Deposits/Credits	25.01
Withdrawals/Debits	- 0.00
<b>Ending balance on 11/30</b>	<b>\$150.09</b>
Average ledger balance this period	\$140.08

Account number: [REDACTED]  
**SUNSHINE STATE HERITAGE PAC CORPORATION**  
*Read account terms and conditions apply*  
 For Direct Deposit use  
 Routing Number (RTN): 063107613  
 For Wire Transfers use  
 Routing Number (RTN): 121000248

**Interest summary**

Interest paid this statement	\$0.01
Average collected balance	\$140.08
Annual percentage yield earned	0.09%
Interest earned this statement period	\$0.01
Interest paid this year	\$0.03

**Transaction history**

Date	Description	Deposits/ Credits	Withdrawals/ Debits	Ending daily balance
11/13	Recurring Transfer From Sunshine State Heritage PAC Business Checking Ref #Op05D5J66G xxxxxx1977	25.00		150.08
11/30	Interest Payment	0.01		150.09
<b>Ending balance on 11/30</b>				<b>150.09</b>
<b>Totals</b>		<b>\$25.01</b>	<b>\$0.00</b>	

The Ending Daily Balance does not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when your transactions posted. If you had insufficient available funds when a transaction posted, fees may have been assessed.

**Monthly service fee summary**

For a complete list of fees and detailed account information, see the Wells Fargo Account Fee and Information Schedule and Account Agreement applicable to your account (EasyPay Card Terms and Conditions for prepaid cards) or talk to a banker. Go to [wellsfargo.com/feefaq](http://wellsfargo.com/feefaq) for a link to these documents, and answers to common monthly service fee questions.

Fee period 11/01/2018 - 11/30/2018	Standard monthly service fee \$6.00	You paid \$0.00
<b>How to avoid the monthly service fee</b>	Minimum required	This fee period
Have any ONE of the following account requirements		
• Average collected balance	\$500.00	\$140.00 <input type="checkbox"/>

# Wells Fargo Combined Statement of Accounts

Primary account number: [REDACTED] ■ October 1, 2018 - October 31, 2018 ■ Page 1 of 5



SUNSHINE STATE HERITAGE PAC  
CORPORATION  
19800 SW 14TH CT  
PEMBROKE PINES FL 33029-1224

## Questions?

Available by phone 24 hours a day, 7 days a week  
Telecommunications Relay Services calls accepted

**1-800-CALL-WELLS** (1-800-225-5935)

TTY: 1-800-877-4833

En español: 1-877-337-7454

Online: [wellsfargo.com/biz](http://wellsfargo.com/biz)

Write: Wells Fargo Bank, N.A. (287)

P.O. Box 6995

Portland, OR 97228-6995

## Your Business and Wells Fargo

Since August 2003, the Wells Fargo/Gallup Small Business Index has surveyed small business owners on current and future perceptions of their business financial situation. View the latest results at [wellsfargoworks.com](http://wellsfargoworks.com).

## Account options

A check mark in the box indicates you have these convenient services with your account(s). Go to [wellsfargo.com/biz](http://wellsfargo.com/biz) or call the number above if you have questions or if you would like to add new services.

- Business Online Banking
- Online Statements
- Business Bill Pay
- Business Spending Report
- Overdraft Protection

## Summary of accounts

### Checking/Prepaid and Savings

Account	Pago	Account number	Ending balance last statement	Ending balance this statement
Wells Fargo Business Choice Checking	2	3204391977	1,399.35	853.21
Business Market Rate Savings	3	2281020616	100.08	125.08
<b>Total deposit accounts</b>			<b>\$1,499.43</b>	<b>\$978.29</b>

EXHIBIT 12 page 3 of 4

Primary account number: [REDACTED] ■ October 1, 2018 - October 31, 2018 ■ Page 2 of 5



## Wells Fargo Business Choice Checking

### Activity summary

Beginning balance on 10/1	\$1,399.35
Deposits/Credits	94.11
Withdrawals/Debits	- 640.25
<b>Ending balance on 10/31</b>	<b>\$853.21</b>
Average ledger balance this period	\$1,297.02

Account number: [REDACTED]  
**SUNSHINE STATE HERITAGE PAC CORPORATION**

Read account terms and conditions apply

For Direct Deposit use  
 Routing Number (RTN): 063107513

For Wire Transfers use  
 Routing Number (RTN): 121000248

### Overdraft Protection

Your account is linked to the following for Overdraft Protection:

- Savings - [REDACTED]

### Transaction history

Date	Check Number	Description	Deposits/Credits	Withdrawals/Debits	Ending daily balance
10/5		Merchant Service Sunshinest 14113591 Sunshine Slate Heritag	23.53		1,422.88
10/10		Merchant Service Sunshinest 14147101 Sunshine Slate Heritag	70.58		
10/10		Recurring Transfer to Sunshine State Heritage PAC Business Market Rate Savings Ref #Op05852Qkt xxxxxx0816		25.00	1,468.46
10/24	1021	Check		50.00	
10/24	1019	Check		251.25	
10/24	1020	Check		300.00	867.21
10/31		Monthly Service Fee		14.00	853.21
<b>Ending balance on 10/31</b>					<b>863.21</b>
<b>Totals</b>			<b>\$94.11</b>	<b>\$640.25</b>	

The Ending Daily Balance does not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when your transactions posted. If you had insufficient available funds when a transaction posted, fees may have been assessed.

### Summary of checks written (checks listed are also displayed in the preceding Transaction history)

Number	Date	Amount	Number	Date	Amount	Number	Date	Amount
1019	10/24	251.25	1020	10/24	300.00	1021	10/24	50.00

### Monthly service fee summary

For a complete list of fees and detailed account information, see the Wells Fargo Account Fee and Information Schedule and Account Agreement applicable to your account (EasyPay Card Terms and Conditions for prepaid cards) or talk to a banker. Go to wells.fargo.com/feefaq for a link to these documents, and answers to common monthly service fee questions.

Fee period 10/01/2018 - 10/31/2018	Standard monthly service fee \$14.00	You paid \$14.00
<b>How to avoid the monthly service fee</b>	<b>Minimum required</b>	<b>This fee period</b>
Have any ONE of the following account requirements		
• Average ledger balance	\$7,500.00	\$1,297.00 <input type="checkbox"/>
• A qualifying transaction from a linked Wells Fargo Business Payroll Services account	1	0 <input type="checkbox"/>
• A qualifying transaction from a linked Wells Fargo Merchant Services account	1	0 <input type="checkbox"/>

EXHIBIT 12 page 4 of 4





**FLORIDA ELECTIONS COMMISSION**

**107 W. Gaines Street,  
Suite 224 Collins Building  
Tallahassee, Florida 32399-1050**

**Telephone: (850) 922-4539**

**Fax: (850) 921-0783**

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

April 4, 2019

David M. Nash, Chair  
Sunshine State Heritage Political Action Committee Corporation  
19800 Southwest 14<sup>th</sup> Court  
Pembroke Pines, FL 33029

**RE: Case No.: FEC 19-075; Respondent: Sunshine State Heritage Political Action  
Committee Corporation**

Dear Mr. Nash:

On February 11, 2019, the Florida Elections Commission received a complaint alleging that you violated Florida's election laws. I have reviewed the complaint and find that it contains one or more **legally sufficient allegations**. The Commission staff will investigate the following alleged violations:

**Section 106.07(7), Florida Statutes:** As alleged in the complaint, Respondent, a political committee registered with the Division of Elections, 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 periods:

- 2018 D1
- 2018 D2
- 2018 D3
- 2018 D4
- 2018 D5
- 2018 D6
- 2018 G7

Sunshine State Heritage Political Action Committee Corporation

April 4, 2019

Page 2

FEC 19-075

**Section 106.19(1)(c), Florida Statutes:** As alleged in the complaint, Respondent, a political committee registered with the Division of Elections, may have falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, during the following reporting periods:

- 2018 D1
- 2018 D2
- 2018 D3
- 2018 D4
- 2018 D5
- 2018 D6
- 2018 G7

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

Please note that all documents related to this matter will be mailed to the above address unless you **notify us of a new address**. Also, please remember that complaints, Commission investigations, investigative reports, and other documents relating to an alleged violation of Chapters 104 or 106, Florida Statutes, are **confidential** until the Commission finds probable cause or no probable cause.

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

Sunshine State Heritage Political Action Committee Corporation

April 4, 2019

Page 3

FEC 19-075

If you have additional questions, please contact **Samantha Spore**, the investigator assigned to this case.

Sincerely,

A handwritten signature in black ink that reads "Tim Vaccaro". The signature is written in a cursive style with a long, sweeping tail on the "o".

Tim Vaccaro  
Executive Director

TV/med

**DIVISION OF ELECTIONS  
FEC NOTICE FORM**

To FEC from Division of Elections

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**Name:** Sunshine State Heritage Political Action Committee Corporation  
**Account Number:** 65314  
**Chairperson:** David M. Nash  
**Treasurer:** Laura Nash  
**Registered Agent:** David M. Nash

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The Division of Elections hereby provides this notice to the Florida Elections Commission pursuant to Sections 106.07(8)(d), 106.22(7), and 106.25(2), Florida Statutes. An apparent violation of Chapter 106, Florida Statutes, has occurred based upon the failure to file a report after notice or failure to file a notification to the filing officer in writing that no report was being filed on the prescribed reporting date under s. 106.07(7).

**Report(s):**

2018 D1  
2018 D2  
2018 D3  
2018 D4  
2018 D5  
2018 D6  
2018 G7

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**Sent By:** Kristi Reid Willis *KRW*  
**Date:** February 6, 2019

eal

## AFFIDAVIT

STATE OF FLORIDA

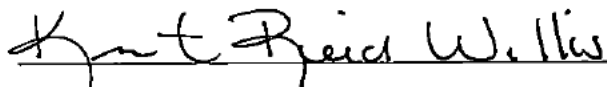
County of Leon

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

1. I am the Chief of the Bureau of Election Records of the Division of Elections (Division). In that capacity, I oversee the Division's duties related to the filing of campaign finance reports.
2. This affidavit is made upon my personal knowledge, including information obtained from review of the attached records, of which I am the custodian.
3. I am of legal age and competent to testify to the matters stated herein.
4. Sunshine State Heritage Political Action Committee Corporation (65314) is a political committee registered with the Division. On February 25, 2016, David M. Nash filed the DSDE 5 and DSDE 6 with the Division of Elections indicating that he was the chairperson.
5. The 2018 D1 campaign treasurer's report was due on October 27, 2018. On October 29, 2018, the Division mailed Mr. Nash notification that the 2018 D1 campaign treasurer's report had not been filed.
6. The 2018 D2 campaign treasurer's report was due on October 28, 2018. On October 29, 2018, the Division mailed Mr. Nash notification that the 2018 D2 campaign treasurer's report had not been filed.
7. The 2018 D3 campaign treasurer's report was due on October 29, 2018. On October 30, 2018, the Division mailed Mr. Nash notification that the 2018 D3 campaign treasurer's report had not been filed.
8. The 2018 D4 campaign treasurer's report was due on October 30, 2018. On October 31, 2018, the Division mailed Mr. Nash notification that the 2018 D4 campaign treasurer's report had not been filed.
9. The 2018 D5 campaign treasurer's report was due on October 31, 2018. On November 1, 2018, the Division mailed Mr. Nash notification that the 2018 D5 campaign treasurer's report had not been filed.

10. The 2018 D6 campaign treasurer's report was due on November 1, 2018. On November 2, 2018, the Division mailed Mr. Nash notification that the 2018 D6 campaign treasurer's report had not been filed.
11. The 2018 G7 campaign treasurer's report was due on November 2, 2018. On November 3, 2018, the Division mailed Mr. Nash notification that the 2018 G7 campaign treasurer's report had not been filed.
12. On November 19, 2018, the Division mailed Mr. Nash second notifications that the 2018 D1, D2, D3, D4, D5, D6, and G7 reports had not been filed.
13. On December 10, 2018, the Division mailed Mr. Nash final notifications with delivery confirmation that the 2018 D1, D2, D3, D4, D5, D6, and G7 reports had not been filed. (See attached letters and delivery confirmation.)
14. Mr. Nash did not notify the Division of Elections prior to or on the prescribed reporting dates for the 2018 D1, D2, D3, D4, D5, D6, and G7 reports that no reports were to be filed.
15. As of February 6, 2019, Mr. Nash has not filed the 2018 D1, D2, D3, D4, D5, D6, and G7 reports.

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



Signature of Affiant

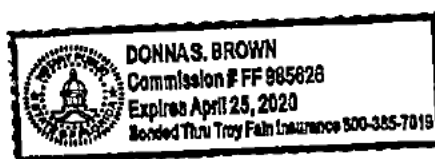
Sworn to (or affirmed) and subscribed before me this 6<sup>th</sup> day of February, 2019.



Signature of Notary Public - State of Florida

Print, Type, or Stamp Commissioned Name of Notary Public

Personally Known





FLORIDA DEPARTMENT OF STATE

Ken Detzner
Secretary of State

DIVISION OF ELECTIONS

Final Notice

Delivery Confirmation:

USPS TRACKING # & CUSTOMER RECEIPT 9114 9014 9645 1416 2497 25
For Tracking or Inquiries go to USPS.com or call 1-800-272-1811

December 10, 2018

David M. Nash, Chairperson
Sunshine State Heritage Political Action Committee Corporation
Post Office Box 816451
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

A recent review of the Division's records show that the Division has not yet received the below-referenced campaign treasurer's report or the required notification that no reportable activity occurred, whichever is applicable, during the following cover period:

Table with 3 columns: Year, Report, Cover Period. Row 1: 2018, DI, 10/20/18 - 10/26/18

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

As we stated in the prior notices, even if you now file the report or notification, the untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Handwritten signature of Kristi Reid Willis

Kristi Reid Willis, Chief
Bureau of Election Records

cc: Laura Nash, Treasurer



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice**

**Delivery Confirmation: 9114 9014 9645 1416 2497 25**

December 10, 2018

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451  
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

A recent review of the Division's records show that the Division has not yet received the below-referenced campaign treasurer's report or the required notification that no reportable activity occurred, whichever is applicable, during the following cover period:

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2018	D2	10/27/18 - 10/27/18

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

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

Sincerely,

Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer





FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice**

**Delivery Confirmation: 9114 9014 9645 1416 2497 25**

December 10, 2018

David M. Nash, Chairperson

Sunshine State Heritage Political Action Committee Corporation

Post Office Box 816451

Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

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<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2018	D3	10/28/18 - 10/28/18

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

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

Sincerely,

Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice**

**Delivery Confirmation: 9114 9014 9645 1416 2497 25**

December 10, 2018

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451  
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

A recent review of the Division's records show that the Division has not yet received the below-referenced campaign treasurer's report or the required notification that no reportable activity occurred, whichever is applicable, during the following cover period:

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2018	D4	10/29/18 - 10/29/18

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

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

Sincerely,

Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice**

**Delivery Confirmation: 9114 9014 9645 1416 2497 25**

December 10, 2018

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451  
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

A recent review of the Division's records show that the Division has not yet received the below-referenced campaign treasurer's report or the required notification that no reportable activity occurred, whichever is applicable, during the following cover period:

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2018	DS	10/30/18 - 10/30/18

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

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

Sincerely,

  
Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer



FLORIDA DEPARTMENT OF STATE

Ken Detzner  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice**

**Delivery Confirmation: 9114 9014 9645 1416 2497 25**

December 10, 2018

David M. Nash, Chairperson  
Sunshine State Heritage Political Action Committee Corporation  
Post Office Box 816451  
Hollywood, FL 33021-3021

PAC 65314

Dear Mr. Nash:

A recent review of the Division's records show that the Division has not yet received the below-referenced campaign treasurer's report or the required notification that no reportable activity occurred, whichever is applicable, during the following cover period:

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2018	D6	10/31/18 - 10/31/18

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

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

Sincerely,

Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer



FLORIDA DEPARTMENT OF STATE

**Ken Detzner**  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice**

**Delivery Confirmation: 9114 9014 9645 1416 2497 25**

December 10, 2018

David M. Nash, Chairperson

Sunshine State Heritage Political Action Committee Corporation

PAC 65314

Post Office Box 816451

Hollywood, FL 33021-3021

Dear Mr. Nash:

A recent review of the Division's records show that the Division has not yet received the below-referenced campaign treasurer's report or the required notification that no reportable activity occurred, whichever is applicable, during the following cover period:

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2018	G7	10/20/18 - 11/1/18

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

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

Sincerely,

Kristi Reid Willis, Chief  
Bureau of Election Records

cc: Laura Nash, Treasurer

## Track Another Package +

**Tracking Number:** 9114901496451416249725

Remove X

Your item has been delivered and is available at a PO Box at 9:22 pm on December 19, 2018 in HOLLYWOOD, FL 33081.

### **Delivered**

December 19, 2018 at 9:22 pm  
Delivered, PO Box  
HOLLYWOOD, FL 33081

Feedback

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**Tracking History**



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**Product Information**



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See Less ^

## Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

**FAQs** (<https://www.usps.com/faqs/uspstracking-faqs.htm>)