

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: People for Better Leaders

Case No.: FEC 16-511

TO: People for Better Leaders
Brian Abraham, Chair
1320 South Dixie Hwy, Ste. 241
Coral Gables, FL 33146

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 16, 2017 at 8:30 am, or as soon thereafter as the parties can be heard**, at the following location: **Senate Office Building, 404 South Monroe Street, Room 110-S, Tallahassee, Florida 32399**

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

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

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

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

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

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

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

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

See further instructions on the reverse side.

Amy McKeever Toman
Executive Director
Florida Elections Commission
August 1, 2017

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

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

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

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

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

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

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

FILED

17 MAY 31 AM 11:26

STATE OF FLORIDA
ELECTIONS COMMISSION

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

**Florida Elections Commission,
Petitioner,**

Case No.: FEC 16-511

v.

**People for Better Leaders,
Respondent.**

_____ /

ORDER OF PROBABLE CAUSE

THIS MATTER was heard by the Florida Elections Commission (Commission) at its regularly scheduled meeting on May 17, 2017, in Tallahassee, Florida.

On March 31, 2017, 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 July 1, 2016, People for Bettter Leaders 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 2016 P1 Report.

Count 2:

On or about July 15, 2016, People for Bettter Leaders 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 2016 P2 Report.

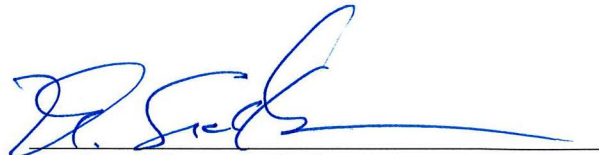
Count 3:

On or about July 22, 2016, People for Better Leaders 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 2016 P2A Report.

Count 4:

On or about August 19, 2016, People for Better Leaders 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 2016 P6 Report.

DONE AND ORDERED by the Florida Elections Commission on May 17, 2017.



M. Scott Thomas, Chairman
Florida Elections Commission

Copies furnished to:
Cole H. Kekelis, Assistant General Counsel
People for Better Leaders, 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: People for Better Leaders

Case No.: FEC 16-511

TO: People for Better Leaders
Brian Abraham, Chair
1320 South Dixie Hwy, Ste. 241
Coral Gables, FL 33146

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

NOTICE OF HEARING (PROBABLE CAUSE DETERMINATION)

A hearing will be held in this case before the Florida Elections Commission on, **May 17, 2017 at 10:30 am, or as soon thereafter as the parties can be heard**, at the following location: **Augustus B. Turnbull Conference Center, 555 West Pensacola Street, Room 214, Tallahassee, Florida 32301**

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

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

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

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

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

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

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

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

See further instructions on the reverse side.

Amy McKeever Toman
Executive Director
Florida Elections Commission
May 1, 2017

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: People for Better Leaders

Case No.: FEC 16-511

STAFF RECOMMENDATION FOLLOWING INVESTIGATION

Pursuant to Section 106.25(4)(c), Florida Statutes, undersigned staff counsel files this written recommendation for disposition of the referral in this case recommending that there is **probable cause** to charge Respondent with violating **Section 106.07(7), Florida Statutes**. Based upon a thorough review of the amended Report of Investigation submitted on March 17, 2017, the following facts and law support this staff recommendation:

1. On September 30, 2016, the Florida Elections Commission (“Commission”) received a referral from the Department of State, Division of Elections (“Division”), alleging that People for Better Leaders (“Respondent”) violated Chapter 106, Florida Statutes.
2. Respondent is a political committee registered with the Division.
3. By letter dated March 9, 2017¹, the Executive Director notified Respondent that Commission staff would investigate the following statutory provision:

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

- 2016 P1
- 2016 P2
- 2016 P2A
- 2016 P6

4. By letter dated October 6, 2015, Kristi Reid Bronson, Division of Elections, 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)²

¹ A letter of legal sufficiency dated January 27, 2017, was previously sent to Respondent, but the letter contained scrivener’s errors. An amended letter of legal sufficiency was mailed to Respondent on March 9, 2017, correcting those scrivener’s errors.

² The Report of Investigation is referred to herein as “ROI.”

5. The acknowledgment letter advised Respondent that the Division’s publications and reporting forms were available on its website and directed Respondent to print out Chapter 106, Florida Statutes, the *Political Committee Handbook*, the *Calendar of Reporting Dates*, and other relevant documents. The letter warned Respondent that it was their responsibility to read, understand, and follow the requirements of Florida’s election laws. (ROI Exhibit 2, page 3)

6. Pursuant to Section 106.07(7), Florida Statutes, in any reporting period during which a political committee has not received funds, made any contributions, or expended any reportable funds, the filing of the required report for that period is waived. However, the political committee is required to notify the filing officer in writing on the prescribed reporting date that no report is being filed on that date.

7. The *Political Committee Handbook* references the statutory requirement regarding written notification and directs political committees to notify the Division by way of the Division’s electronic filing system. (ROI Exhibit 3) The *Political Committee EFS User’s Guide* shows the process through which to notify the Division. The user’s guide instructs political committees to select the relevant reporting period and place a checkmark in a box titled “Waiver” to indicate the lack of reportable financial activity. (ROI Exhibit 4, pages 1-2)

8. Respondent failed to notify the filing officer on the prescribed reporting dates that no reports would be filed for the following reporting periods, as set forth in the table below. (ROI Exhibit 5)

| Report | Report Cover Period | Date Notification Due | Date Notification Filed | No. of Days Late |
|----------|---------------------|-----------------------|-------------------------|------------------|
| 2016 P1 | 06/01/16 – 06/24/16 | 07/01/16 | 07/02/16 | 1 |
| 2016 P2 | 07/02/16 – 07/08/16 | 07/15/16 | 07/27/16 | 12 |
| 2016 P2A | 07/09/16 – 07/15/16 | 07/22/16 | 07/27/16 | 5 |
| 2016 P6 | 08/06/16 – 08/12/16 | 08/19/16 | 08/24/16 | 5 |

9. Respondent was offered multiple opportunities to respond to Commission staff’s investigation, but did not do so. Respondent’s chairman did not return telephone calls placed by Commission staff in attempts to interview him. (ROI Exhibit 7)

10. “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).

11. The facts set forth above show that Respondent is a political committee registered with the Division. Respondent failed to notify the filing officer on the prescribed reporting dates

that no reports would be filed for the following reporting periods: 2016 P1, 2016 P2, 2016 P2A, and 2016 P6.

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 July 1, 2016, People for Better Leaders 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 2016 P1 Report.

Count 2:

On or about July 15, 2016, People for Better Leaders 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 2016 P2 Report.

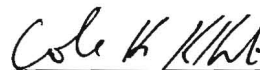
Count 3:

On or about July 22, 2016, People for Better Leaders 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 2016 P2A Report.

Count 4:

On or about August 19, 2016, People for Better Leaders 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 2016 P6 Report.

Respectfully submitted on March 31, 2017,



Cole H. Kekelis
Assistant General Counsel

I reviewed this Staff Recommendation this 31st day of March 2017.

A handwritten signature in black ink, appearing to read "Amy McKeever Toman", written over a horizontal line.

Amy McKeever Toman
Executive Director

FLORIDA ELECTIONS COMMISSION

Amended Report of Investigation for Failure to Notify Filing Officer¹

Case Number: FEC 16-511

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 is being filed

Respondent: People for Better Leaders

Complainant: Division of Elections

Respondent Type:

- Candidate
- Political Committee

I. Preliminary Information:

1. An appointment of Campaign Treasurer and Designation of Campaign Depository (DS-DE 6) was filed on October 2, 2015. (Ex. 1)

2. An acknowledgement letter was mailed to the address provided on Respondent’s DS-DE 6 on October 6, 2015 advising Respondent that all of the Division’s publications and reporting forms are available on their website, including Chapter 106, Florida Statutes, the *Political Committee Handbook*, and the Calendar of Reporting Dates. (Ex. 2)

3. The acknowledgement letter also states, “An online instruction guide is available to you on the EFS to assist with navigation, data entry, and submission of reports” and provides the telephone number for the Division’s EFS Help Desk.

4. The *Political Committee Handbook*, discusses filing a notice-of-no-activity when there is no activity to disclose on page 26. (Ex. 3)

5. Pages 12, 13, 45, and 46 of the *Political Committee EFS User’s Guide* discuss how to notify the Division on the prescribed reporting date that no report will be filed using the EFS. Specifically, page 13 instructs the user to click the box next to “waiver” if there is no activity to disclose. (Ex. 4)

6. In a telephone interview on April 2, 2015, Kristi Reid-Bronson clarified that once the waiver box is chosen and a new report is opened as shown on page 12, the only available option on the report summary screen will be “Go To File Report” as shown on page 13. Choosing “Go To File Report” will take the user directly to the screens where the chairman/treasurer PINS are entered as shown on pages 45 and 46.

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

7. Respondent’s filing history reflects the untimely filed notifications summarized below. (Ex. 5)

| Report | Report Cover Period | Date Notification Due | Date Notification Filed | No. of Days Late |
|---------|---------------------|-----------------------|-------------------------|------------------|
| 2016 P1 | 06/01/16 – 06/24/16 | 07/01/16 | 07/02/16 | 1 |

¹ Report of investigation was sent on March, 6 2017. Due to a Scrivener’s Error in the original letter of legal sufficiency, an amended letter of legal sufficiency was sent on March 9, 2017. This amended report of investigation is applicable to the amended letter of legal sufficiency.

| | | | | |
|----------|---------------------|----------|----------|----|
| 2016 P2 | 07/02/16 – 07/08/16 | 07/15/16 | 07/27/16 | 12 |
| 2016 P2A | 07/09/16 – 07/15/16 | 07/22/16 | 07/27/16 | 5 |
| 2016 P6 | 08/06/16 – 08/12/16 | 08/19/16 | 08/24/16 | 5 |

8. Respondent's chairman did not provide a written response to the referral.

9. During the course of the investigation, I reviewed Respondents previous filing history. I determined that there were four reporting periods prior to the 2016 P1 reporting period in which waivers were timely filed. (Ex. 5)

III. FEC History:

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

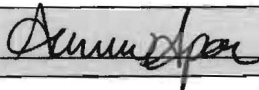
Conclusion:

11. I attempted to contact Respondent's chairman on two occasions to give him an opportunity to discuss the allegations in the referral. Additionally, a questionnaire-affidavit was mailed to Respondent's chairman on February 7, 2017. As of the date of this report, Respondent's chairman has not returned my calls, nor has he returned an affidavit.

12. Because Respondent's chairman has not contacted the Commission or returned the questionnaire, I am unable to ascertain whether Respondent has read Chapter 106, Florida Statutes or the *Political Committee Handbook*. Respondent's chairman signed the Statement of Organization of Political Committee form on September 24, 2015. (Ex. 6)

13. The Investigative Phone Log is included with this report. (Ex. 7)

SIGNATURE OF INVESTIGATOR:



Date:

3/17/2017



FLORIDA ELECTIONS COMMISSION

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

March 9, 2017

People for Better Leaders
Attn: Brian Abraham, Chair
1320 South Dixie Highway, Suite 241
Coral Gables, FL 33146

**RE: Case No.: FEC 16-511; Respondent: People for Better Leaders – AMENDED
LETTER OF LEGAL SUFFICIENCY**

Dear Mr. Abraham:

On September 30, 2016, the Florida Elections Commission received a complaint alleging that your committee violated Florida's election laws. I have reviewed the complaint and find that it contains one or more legally sufficient allegations. The Commission staff will investigate the following alleged violation:

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

- 2016 P1
- 2016 P2
- 2016 P2A
- 2016 P6

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

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

to you and you may file a response within 14 days from the date the recommendation is mailed to you. Your timely filed response(s) will be considered by the Commission when determining probable cause.

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

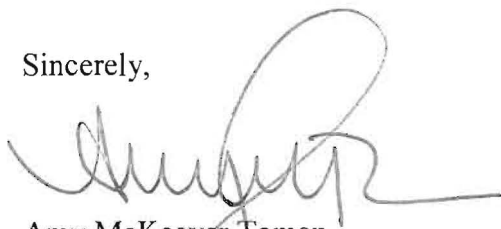
At any time before a probable cause finding, you may notify us in writing that you want to enter into negotiations directed towards reaching a settlement via consent agreement.

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

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

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

Sincerely,



Amy McKeever Toman
Executive Director

AMT/enr

FLORIDA ELECTIONS COMMISSION

Report of Investigation for Failure to Notify Filing Officer

Case Number: FEC 16-511

Respondent: People for Better Leaders

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 is being filed

Complainant: Division of Elections

Respondent Type:

Candidate

Political Committee

I. Preliminary Information:

1. An appointment of Campaign Treasurer and Designation of Campaign Depository (DS-DE 6) was filed on October 2, 2015. (Ex. 1)

2. An acknowledgement letter was mailed to the address provided on Respondent's DS-DE 6 on October 6, 2015 advising Respondent that all of the Division's publications and reporting forms are available on their website, including Chapter 106, Florida Statutes, the *Political Committee Handbook*, and the Calendar of Reporting Dates. (Ex. 2)

3. The acknowledgement letter also states, "An online instruction guide is available to you on the EFS to assist with navigation, data entry, and submission of reports" and provides the telephone number for the Division's EFS Help Desk.

4. The *Political Committee Handbook*, discusses filing a notice-of-no-activity when there is no activity to disclose on page 26. (Ex. 3)

5. Pages 12, 13, 45, and 46 of the *Political Committee EFS User's Guide* discuss how to notify the Division on the prescribed reporting date that no report will be filed using the EFS. Specifically, page 13 instructs the user to click the box next to "waiver" if there is no activity to disclose. (Ex. 4)

6. In a telephone interview on April 2, 2015, Kristi Reid-Bronson clarified that once the waiver box is chosen and a new report is opened as shown on page 12, the only available option on the report summary screen will be "Go To File Report" as shown on page 13. Choosing "Go To File Report" will take the user directly to the screens where the chairman/treasurer PINS are entered as shown on pages 45 and 46.

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

7. Respondent's filing history reflects the untimely filed notifications summarized below. (Ex. 5)

| Report | Report Cover Period | Date Notification Due | Date Notification Filed | No. of Days Late |
|----------|---------------------|-----------------------|-------------------------|------------------|
| 2016 P1 | 06/01/16 – 06/24/16 | 07/01/16 | 07/02/16 | 1 |
| 2016 P2 | 07/02/16 – 07/08/16 | 07/15/16 | 07/27/16 | 12 |
| 2016 P2A | 07/09/16 – 07/15/16 | 07/22/16 | 07/27/16 | 5 |
| 2016 P6 | 08/06/16 – 08/12/16 | 08/19/16 | 08/24/16 | 5 |

8. Respondent's chairman did not provide a written response to the referral.

9. During the course of the investigation, I reviewed Respondents previous filing history. I determined that there were four reporting periods prior to the 2016 P1 reporting period in which waivers were timely filed. (Ex. 5)

III. FEC History:

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

Conclusion:

11. I attempted to contact Respondent's chairman on two occasions to give him an opportunity to discuss the allegations in the referral. Additionally, a questionnaire-affidavit was mailed to Respondent's chairman on February 7, 2017. As of the date of this report, Respondent's chairman has not returned my calls, nor has he returned an affidavit.

12. Because Respondent's chairman has not contacted the Commission or returned the questionnaire, I am unable to ascertain whether Respondent has read Chapter 106, Florida Statutes or the *Political Committee Handbook*. Respondent's chairman signed the Statement of Organization of Political Committee form on September 24, 2015. (Ex. 6)

13. The Investigative Phone Log is included with this report. (Ex. 7)

SIGNATURE OF INVESTIGATOR:

James D. [Signature]

Date:

03/03/17

FLORIDA ELECTIONS COMMISSION
REPORT OF INVESTIGATION
People for Better Leaders -- FEC 16-511

| LIST OF EXHIBITS | |
|-------------------------|---|
| Exhibits #s | Description of Exhibits |
| Exhibit 1 | Copy of original DS-DE 6 filed October 2, 2015 |
| Exhibit 2 | Copy of original acknowledgment letter dated October 6, 2015 |
| Exhibit 3 | Copy of <i>Political Committee Handbook</i> , page 26 |
| Exhibit 4 | Copy of <i>Political Committee EFS User's Guide</i> , pages 12, 13, 45, and 46 |
| Exhibit 5 | Respondent's filing history |
| Exhibit 6 | Copy of Statement of Organization of Political Committee form, dated September 24, 2016 |
| Exhibit 7 | Phone Log |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |

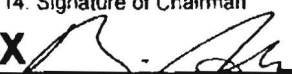
**APPOINTMENT OF CAMPAIGN TREASURER
AND DESIGNATION OF CAMPAIGN
DEPOSITORY FOR
POLITICAL COMMITTEES**
(Sections 106.011(1) and 106.021(1), F.S.)

RECEIVED
2015 OCT -2 AM 10:21

CHECK APPROPRIATE BOX:

OFFICE USE ONLY

Original Appointment of Treasurer Reappointment of Treasurer Deputy Treasurer

| | | | |
|---|--|---|-----------------------|
| 1. Committee or Organization People For Better Leaders | | 2. Telephone (786) 224-4947 | |
| 3. Name of Treasurer or Deputy Treasurer Brian George | | 4. Email (optional) () | |
| 5. Telephone (optional) () | | | |
| 6. Mailing Address 2000 Ponce DeLeon Blvd, 6th Floor Coral Gables, FL 33134 | | | |
| 7. Street Address 2000 Ponce DeLeon Blvd, 6th Floor Coral Gables, FL 33134 | | | |
| 8. The following bank has been designated as the <input checked="" type="checkbox"/> Primary Depository <input type="checkbox"/> Secondary Depository | | | |
| 9. Name of Bank Sabadell United Bank | | 10. Street Address 1111 Brickell Ave | |
| 11. City Miami | | 12. State FL | 13. Zip Code 33131 |
| 14. Signature of Chairman  | | 15. Name of Chairman (Print or Type) Brian Abraham | |

Campaign Treasurer's Acceptance of Appointment

I, Brian George, do hereby accept the appointment as
(Please Print or Type)
 treasurer or deputy treasurer for People For Better Leaders
(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.**

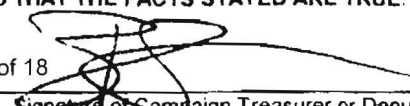
9/24/15 
 Date Signature of Campaign Treasurer or Deputy Treasurer

EXHIBIT 1 page 1 of 1



FLORIDA DEPARTMENT OF STATE

RICK SCOTT
Governor

KEN DETZNER
Secretary of State

October 6, 2015

Brian Abraham, Chairperson
People For Better Leaders
1320 South Dixie Highway Suite 241
Coral Gables, Florida 33146

Dear Mr. Abraham:

This will acknowledge receipt of the Statement of Organization and Appointment of Campaign Treasurer and Designation of Campaign Depository for **People For Better Leaders**, which were placed on file in our office on October 2, 2015. 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 **November 10, 2015**. The report will cover the period of October 1-31, 2015 (M10). 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: 64958

EXHIBIT 2 page 1 of 3



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/
Promoting Florida's History and Culture VivaFlorida.com



Brian Abraham, Chairperson
October 5, 2015
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, a confidential pin number to access the EFS was sent to the 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.

EXHIBIT 2 page 2 of 3

Brian Abraham, Chairperson
October 5, 2015
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: Brian George, Treasurer

EXHIBIT 2 page 3 of 3

Unless the electronic filing requirements of Section 106.0705, Florida Statutes, apply, reports shall be filed no later than 5 p.m. of the day designated. A report postmarked by the U.S. Postal Service no later than midnight of the day designated is deemed timely filed. A report received by the filing officer within 5 days after the designated due date that was delivered by the U.S. Postal Service is deemed timely filed unless it has a postmark indicating the report was mailed after the designated due date. A certificate of mailing obtained from and dated by the U.S. Postal Service at the time of mailing or a receipt from an established courier company, which bears a date on or before the date on which the report is due, is proof of mailing in a timely manner. Reports filed with the Division through the Electronic Filing System (EFS) are due no later than midnight, Eastern Time, of the due date. (See Chapter 12, Electronic Filing of Campaign Reports.)

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

Penalty for Late Filing

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

(Section 106.07(8), F.S.)

Notice of No Activity

When there has been no reportable activity in the campaign account during a reporting period (no funds expended or received) the filing of the report is waived. The political committee shall notify the filing officer in writing on or before the prescribed reporting date that no report is being filed on that date. The next report filed must specify that the report covers the entire period between the last submitted report and the report being filed.

(Section 106.07, F.S.)

A notice of no activity filed with the Division must be filed electronically using the Division's electronic filing system.

(Section 106.0705, F.S.)

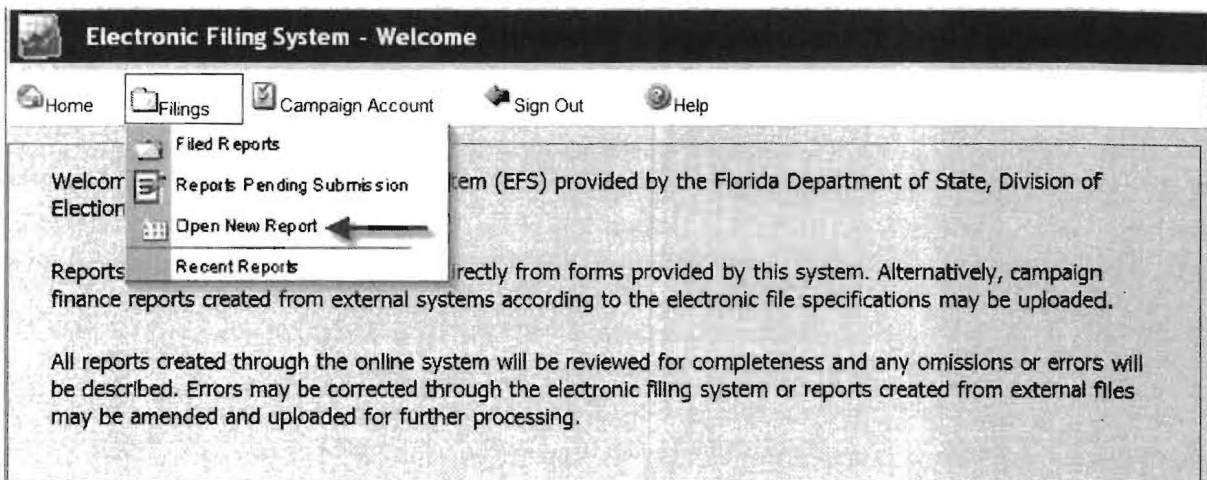
Special Election Reports

When a special election is called to fill a vacancy in office, all political committees making contributions or expenditures to influence the results of the special election shall file campaign treasurers' reports with the filing officer on the dates set by the Department of State pursuant to Section 100.111, F.S.

When an election is called for an issue to appear on the ballot at a time when no candidates are scheduled to appear on the ballot, all political committees making contributions or expenditures in support of or in opposition to such issue shall file reports on the 18th and 4th days prior to such election.

Create a New Report by Data Entry

From the Welcome screen, click  and then  Open New Report



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


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


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

Special Election Report Waiver

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

Browse...
Open Report

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

Click  arrow next to **Report Type** select report type corresponding to the correct cover period and due date.

The **Cover Period** dates will automatically fill in based on the **Calendar of Election and Reporting Dates**.

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

If this report is for a special election, click the box next to **Special Election Report**. (If no special elections are scheduled this option will not be available.)

*****NOTE*****

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

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

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

Report: 2010 - G4 - 27 2010 General Election Covers: 10/16/2010-10/28/2010 Due: 10/29/2010
 Amendment Waiver Complete Status: Incomplete Detail Records
File Date: Review Status: Not Reviewed
Status: Data Entry Last Review:
of Transactions: 0 Review Recalculate Go To File Report Append File Delete Report Save
Contributions Total Amount Expenditures Total Amount
Cash and Checks: 0.00 Monetary: 0.00
Loans: 0.00 Transfers to Off Acct: 0.00
Total Monetary: 0.00 Total Monetary: 0.00
In-Kind: 0.00 Other Distributions: 0.00
Review Messages
Created: 10/26/2010 11:41:25 AM By: 50552 Revised: 10/26/2010 11:41:25 AM By: 50552

File the Report

If the **Review Status** is Updated Detail – Needs Review the report has not been reviewed since the last update. (See page 39 for instructions on how to submit the report to the system for review.)

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

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

Attachment: Waiver Complete Status: Complete Detail Records

File Date: Review Status: Reviewed

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

of Transactions: 1 **Review** **Recalculate** **Go To File Report** **Append File** **Delete Report** **Save**

| Contributions | Total Amount | Expenditures | Total Amount |
|------------------|--------------|------------------------|--------------|
| Cash and Checks: | 0.00 | Monetary: | 51.00 |
| Loans: | 0.00 | Transfers to Off Acct: | 0.00 |
| Total Monetary: | 0.00 | Total Monetary: | 51.00 |
| In-Kind: | 0.00 | Other Distributions: | 0.00 |

Review Messages

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

Click on **Go To File Report**.

The **chairperson** enters his or her **PIN**, and then selects **Report Approved**.

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

Step 1: Enter the candidate/chairperson PIN.

Step 2: Select the 'Report Approved' button.

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

Review Status: Reviewed

Original Amended

Waiver

PIN for Candidate/Chairperson: **Report Approved**

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

Campaign Treasurer: 


The treasurer enters his **PIN** and then clicks .

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

Review Status: Original Amended

Campaign Treasurer: Waiver

PIN for specified Treasurer:

To Edit Report Again Select Cancel: 

IMPORTANT NOTE: If changes need to be made after a chairperson PIN is entered, the treasurer must undo the chairperson PIN validation before the system will allow changes. See page 49 for instructions.



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

Florida Department of State - Division of Elections

Florida Election System Reports

Candidate/Committee Lookup

Name: People for Better Leade

Committee Name: People for Better Leaders

Account: 64958

Election:

Acct: 64958

Type: Committee

Search

Reset

| Date Due | Type | Date Filed | Status | Days Late | Fine Assessed | Appealed | Amount Fined | Amount Paid |
|------------|------|------------|--------|-----------|---------------|----------|--------------|-------------|
| 2/10/2017 | M1 | 2/6/2017 | | | | | | |
| 1/10/2017 | M12 | 1/11/2017 | CLO | 1 | \$0.00 | | \$0.00 | \$0.00 |
| 12/12/2016 | M11 | 12/11/2016 | | | | | | |
| 11/4/2016 | D6 | 11/9/2016 | CLO | 5 | \$0.00 | | \$0.00 | \$0.00 |
| 11/4/2016 | G7 | 11/9/2016 | CLO | 5 | \$0.00 | | \$0.00 | \$0.00 |
| 11/2/2016 | D5 | 11/9/2016 | CLO | 7 | \$0.00 | | \$0.00 | \$0.00 |
| 11/1/2016 | D4 | 11/9/2016 | CLO | 8 | \$0.00 | | \$0.00 | \$0.00 |
| 10/31/2016 | D3 | 11/9/2016 | CLO | 9 | \$0.00 | | \$0.00 | \$0.00 |
| 10/30/2016 | D2 | 11/9/2016 | CLO | 10 | \$0.00 | | \$0.00 | \$0.00 |
| 10/29/2016 | D1 | 10/31/2016 | CLO | 2 | \$100.00 | | \$100.00 | \$100.00 |
| 10/28/2016 | G6 | 10/30/2016 | CLO | 0 | \$150.00 | | \$150.00 | \$150.00 |
| 10/21/2016 | G5 | 10/30/2016 | CLO | 9 | \$0.00 | | \$0.00 | \$0.00 |
| 10/14/2016 | G4 | 10/12/2016 | | | | | | |
| 10/7/2016 | G3 | 10/12/2016 | CLO | 5 | \$0.00 | | \$0.00 | \$0.00 |
| 9/30/2016 | G2A | 10/12/2016 | CLO | 12 | \$0.00 | | \$0.00 | \$0.00 |
| 9/23/2016 | G2 | 9/24/2016 | CLO | 1 | \$0.00 | | \$0.00 | \$0.00 |
| 9/16/2016 | G1A | 9/24/2016 | CLO | 8 | \$0.00 | | \$0.00 | \$0.00 |
| 9/9/2016 | G1 | 9/24/2016 | CLO | 15 | \$0.00 | | \$0.00 | \$0.00 |
| 9/2/2016 | P7A | 9/5/2016 | | | | | | |
| 8/26/2016 | P7 | 8/26/2016 | | | | | | |
| 8/19/2016 | P6 | 8/24/2016 | FEC | 5 | \$0.00 | | \$0.00 | \$0.00 |
| 8/12/2016 | P5 | 8/10/2016 | | | | | | |
| 8/5/2016 | P4 | 8/4/2016 | | | | | | |
| 7/29/2016 | P3 | 7/27/2016 | | | | | | |
| 7/22/2016 | P2A | 7/27/2016 | FEC | 5 | \$0.00 | | \$0.00 | \$0.00 |
| 7/15/2016 | P2 | 7/27/2016 | FEC | 12 | \$0.00 | | \$0.00 | \$0.00 |
| 7/8/2016 | P1A | 7/2/2016 | | | | | | |
| 7/1/2016 | P1 | 7/2/2016 | FEC | 1 | \$0.00 | | \$0.00 | \$0.00 |
| 6/10/2016 | M5 | 6/4/2016 | | | | | | |
| 5/10/2016 | M4 | 5/6/2016 | | | | | | |
| 4/11/2016 | M3 | 4/10/2016 | | | | | | |
| 3/10/2016 | M2 | 3/7/2016 | | | | | | |
| 2/10/2016 | M1 | 2/5/2016 | | | | | | |
| 1/11/2016 | M12 | 1/9/2016 | | | | | | |
| 12/10/2015 | M11 | 12/9/2015 | | | | | | |
| 11/10/2015 | M10 | 11/9/2015 | | | | | | |

waiver; timely filed

*waiver
waiver
waiver* **>** *timely filed*

EXHIBIT 5 page 1 of 3



Florida Department of State Division of Elections

People for Better Leaders

Campaign Finance Activity

Note: The information presented below was obtained from the Committee's/Candidate's Campaign Treasurer's Report filed with the Division of Elections. About the Campaign Finance Data Base. If all contributions for a reporting period are less than 1 dollar Then they may not be displayed.

| | Filing Period | Contributions | | | Expend | Other | Transfers |
|---|-------------------------|---------------|-------|--------|--------|-------|-----------|
| | | Monetary | Loans | InKind | | | |
| W | 10/01/2015 - 10/31/2015 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 11/01/2015 - 11/30/2015 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 12/01/2015 - 12/31/2015 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| ● | 01/01/2016 - 01/31/2016 | 43,000.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| ● | 02/01/2016 - 02/29/2016 | 30,000.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| ● | 03/01/2016 - 03/31/2016 | 22,500.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| ● | 04/01/2016 - 04/30/2016 | 25,000.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 05/01/2016 - 05/31/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 06/01/2016 - 06/24/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| ● | 06/25/2016 - 07/01/2016 | 17,000.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 07/02/2016 - 07/08/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 07/09/2016 - 07/15/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 07/16/2016 - 07/22/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 07/23/2016 - 07/29/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 07/30/2016 - 08/05/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 08/06/2016 - 08/12/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| ● | 08/13/2016 - 08/25/2016 | 15,000.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 08/26/2016 - 08/26/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 08/27/2016 - 09/02/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 09/03/2016 - 09/09/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 09/10/2016 - 09/16/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 09/17/2016 - 09/23/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 09/24/2016 - 09/30/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 10/01/2016 - 10/07/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 10/08/2016 - 10/14/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| ● | 10/15/2016 - 10/21/2016 | 19,000.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

| | | | | | | | |
|----------------------------------|---------------------------|------------|------|------|--------|------|------|
| <input type="radio"/> | 10/22/2016 - 10/28/2016 | 09.85 | 0.00 | 0.00 | 0.15 | 0.00 | 0.00 |
| W | 10/29/2016 - 10/29/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 10/30/2016 - 10/30/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 10/31/2016 - 10/31/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 11/01/2016 - 11/01/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 11/02/2016 - 11/02/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 10/22/2016 - 11/03/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| <input type="radio"/> | 11/04/2016 - 11/30/2016 | 5,000.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 12/01/2016 - 12/31/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| <input type="radio"/> | 01/01/2017 - 01/31/2017 | 10,250.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| <input checked="" type="radio"/> | All Dates (Totals) | 200,259.85 | 0.00 | 0.00 | 490.15 | 0.00 | 0.00 |

Note: (E) indicates that report was filed electronically

X Indicates that detail has not been released

W Indicates that a waiver was filed and **L** Indicates that a loan report was filed

Select Detail Type

Contributions ▼

Select Sort Order

Date(Ascending) ▼

Select Output Type

Display On Screen ▼

Submit Query Now

[Query the Campaign Finance Data Base](#)

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

EXHIBIT 5 page 3 of 3

STATEMENT OF ORGANIZATION OF POLITICAL COMMITTEE

(PLEASE TYPE)

OFFICE USE ONLY

RECEIVED
2015 OCT -2 AM 10:21

1. Full Name of Committee

People For Better Leaders

Telephone:

305 505-6037

Mailing Address (include city, state and zip code)

1320 S Dixie Hwy Suite 241
Coral Gables, FL 33146

Street Address (include city, state and zip code)

1320 S Dixie Hwy Suite 241
Coral Gables, FL 33146

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

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

3. Area, Scope and Jurisdiction of the Committee

Statewide, multi-district, countywide, legislative, candidate and ballot issues, and municipal elections.

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

Better leaders and good government

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 |
|--------------|---|-----------------------------|
| Brian George | 2000 Ponce DeLeon Blvd, 6th Floor Coral Gables, FL 33134 | 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 | |
| Brian Abraham | 1320 S Dixie Hwy Suite 241 Coral Gables, FL 33146 | Chairperson | |
| Brian George | 2000 Ponce DeLeon Blvd, 6th Floor Coral Gables, FL 33134 | 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 |
|------------------|-----------------|---------------|-------|
| To be determined | | | |

8. List Any Issues this Committee is Supporting: To be determined
 List Any Issues this Committee is Opposing: To be determined

9. If this Committee is Supporting the Entire Ticket of a Party, Give Name of Party
 N/A

10. In the Event of Dissolution, What Disposition will be Made of Residual Funds?
 Donate to non-profit or like organization or return to contributors

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


| Name of Bank or Depository & Account Number | Mailing Address |
|---|--|
| Sabadell United Bank | 1111 Brickell Avenue Miami, Florida 33131 |

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 |
|--------------|----------------------------|-----------------------------|-----------------|
| 1120-POL | annually | IRS | Ogden UT |
| 990 | annually | IRS | Ogden UT |
| 8871 | w/i 24 hours | IRS | Ogden UT |

STATE OF Florida COUNTY Miami-Dade

I, Brian Abraham, certify that the information in this Statement of Organization is complete, true and correct.

X  Signature of Chairman of Political Committee 9/24/2015 Date

**FLORIDA ELECTIONS COMMISSION
PHONE LOG
Case No.: FEC 16-511**

Respondent: People for Better Leaders

Complainant: Division of Elections

1. **Date and time:** 02/01/2017- 10:12 AM
Name: Brian Abraham
Phone #: 305-505-6037
Summary: I attempted to call the number listed for the Respondent, however, I reached a recording that stated that this number was not accepting incoming calls at this time.
Memo to File? No
Entered by: S. Spore

2. **Date and time:** 03/02/2017- 3:32 PM
Name: Brian Abraham
Phone #: 305-505-6037
Summary: I attempted to call the number listed for the Respondent, to follow up on the affidavit that was sent on 02/07/2017, and to make initial contact. This time, the phone rang once, and then I heard a series of loud clicks, before I was disconnected. It did not sound as if anyone picked up.
Memo to File? No
Entered by: S. Spore



FLORIDA ELECTIONS COMMISSION

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

January 27, 2017

People for Better Leaders
Attn: Brian Abraham, Chair
1320 South Dixie Highway, Suite 241
Coral Gables, FL 33146

RE: Case No.: FEC 16-511; Respondent: People for Better Leaders

Dear Mr. Abraham:

On September 30, 2016, the Florida Elections Commission received a complaint alleging that your committee violated Florida's election laws. I have reviewed the complaint and find that it contains one or more legally sufficient allegations. The Commission staff will investigate the following alleged violation:

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

- 2015 M3
- 2016 M5
- 2016 P2✓
- 2016 P4
- 2016 P5
- 2016 P6✓

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

When we conclude the investigation, a copy of the Report of Investigation will be mailed to you at the above address. You may file a response to the report within 14 days from the date the report is mailed to you. Based on the results of the investigation, legal staff will make a written

recommendation to the Commission on whether there is probable cause to believe you have violated Chapter 104 or 106, Florida Statutes. A copy of the Staff Recommendation will be mailed to you and you may file a response within 14 days from the date the recommendation is mailed to you. Your timely filed response(s) will be considered by the Commission when determining probable cause.

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


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

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

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

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

Sincerely,



Amy McKeever Toman
Executive Director

AMT/dam

**DIVISION OF ELECTIONS
FEC NOTICE FORM**

To FEC from Division of Elections

RECEIVED

2016 SEP 30 P 3:52

STATE OF FLORIDA

Name: People for Better Leaders
Account Number: 64958
Chairperson: Brian Abraham
Treasurer: Brian George
Registered Agent: Brian Abraham

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 repeated late filings or failure to file notifications to the filing officer in writing that no report was being filed on the prescribed reporting date under s. 106.07(7).

2016 P1

2016 P2

2016 P2A

2016 P6

Sent By: Kristi Reid Bronson
Date: September 6, 2016
ejr

KRB

AFFIDAVIT

STATE OF FLORIDA

County of Leon

Kristi Reid Bronson, being duly sworn, says:

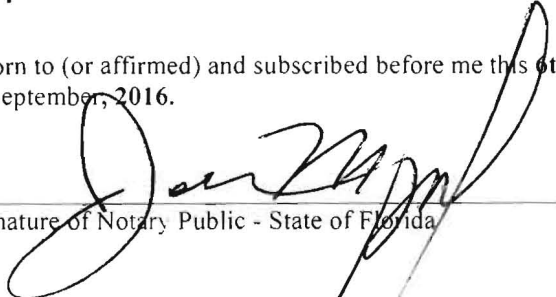
1. I am the Chief of the Bureau of Election Records of the Division of Elections (Division). In that capacity, I oversee the Division's duties related to the filing of campaign finance reports. This affidavit is made upon my personal knowledge, including information obtained from review of the attached records, of which I am the custodian.
2. I am of legal age and competent to testify to the matters stated herein.
3. People for Better Leaders (64958) is a Political Committee registered with the Division. On October 2, 2015, Brian Abraham filed the DSDE 5 and DSDE 6 with the Division of Elections indicating that he was the chairperson and Brian George was the treasurer for the committee. (See attached documents and acknowledgment letter.)
4. The 2016 P1 campaign treasurer's report was due on July 1, 2016. Mr. George failed to notify the Division that no report was being filed on the prescribed reporting date. Mr. George filed a notification of no activity on July 2, 2016. (See attached letter and file receipt.)
5. The 2016 P2 campaign treasurer's report was due on July 15, 2016. Mr. George failed to notify the Division that no report was being filed on the prescribed reporting date. Mr. George filed a notification of no activity on July 27, 2016. (See attached letter and file receipt.)
6. The 2016 P2A campaign treasurer's report was due on July 22, 2016. Mr. George failed to notify the Division that no report was being filed on the prescribed reporting date. Mr. George filed a notification of no activity on July 27, 2016. (See attached letter and file receipt.)
7. The 2016 P6 campaign treasurer's report was due on August 19, 2016. Mr. George failed to notify the Division that no report was being filed on the prescribed reporting date. Mr. George filed a notification of no activity on August 24, 2016. (See attached letter and file receipt.)

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



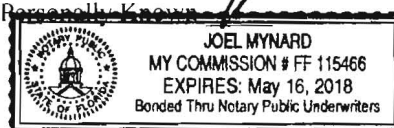
Signature of Affiant

Sworn to (or affirmed) and subscribed before me this 6th day of September, 2016.



Signature of Notary Public - State of Florida

Print, Type, or Stamp Commissioned Name of Notary Public



*Committee
Tracking
System*

People for Better Leaders

Type: Political Committee

Status: Active

Address: 1320 South Dixie Highway
Suite 241
Coral Gables, FL 33146

Phone: (305)505-6037

Chairperson: Brian Abraham
1320 South Dixie Highway
Suite 241
Coral Gables, FL 33146

Treasurer: Brian George
2000 Ponce DeLeon
Boulevard
6th Floor
Coral Gables, FL 331340000

Registered Agent: Brian Abraham
1320 South Dixie Highway
Suite 241
Coral Gables, FL 33146

Purpose:

Affiliates:

Campaign Finance Activity

Campaign Documents

STATEMENT OF ORGANIZATION OF POLITICAL COMMITTEE

(PLEASE TYPE)

OFFICE USE ONLY

RECEIVED
2015 OCT -2 AM 10:21

1. Full Name of Committee

People For Better Leaders

Telephone

305 505-6037

Mailing Address (include city, state and zip code)

1320 S Dixie Hwy Suite 241
Coral Gables, FL 33146

Street Address (include city, state and zip code)

1320 S Dixie Hwy Suite 241
Coral Gables, FL 33146

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

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

3. Area, Scope and Jurisdiction of the Committee

Statewide, multi-district, countywide, legislative, candidate and ballot issues, and municipal elections.

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

Better leaders and good government

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 |
|--------------|---|-----------------------------|
| Brian George | 2000 Ponce DeLeon Blvd, 6th Floor Coral Gables, FL 33134 | 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 |
|---------------|---|-----------------------------|
| Brian Abraham | 1320 S Dixie Hwy Suite 241 Coral Gables, FL 33146 | Chairperson |
| Brian George | 2000 Ponce DeLeon Blvd, 6th Floor Coral Gables, FL 33134 | 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 |
|------------------|-----------------|---------------|-------|
| To be determined | | | |

8. List Any Issues this Committee is Supporting: To be determined

List Any Issues this Committee is Opposing: To be determined

9. If this Committee is Supporting the Entire Ticket of a Party, Give Name of Party

N/A

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

Donate to non-profit or like organization or return to contributors

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

| Name of Bank or Depository & Account Number | Mailing Address |
|---|--|
| Sabadell United Bank | 1111 Brickell Avenue Miami, Florida 33131 |

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 |
|--------------|----------------------------|-----------------------------|-----------------|
| 1120-POL | annually | IRS | Ogden UT |
| 990 | annually | IRS | Ogden UT |
| 8871 | w/ 24 hours | IRS | Ogden UT |

STATE OF Florida COUNTY Miami-Dade

I, Brian Abraham, certify that the information in this Statement of

Organization is complete, true and correct.

X



Signature of Chairman of Political Committee

9/24/2015
Date

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

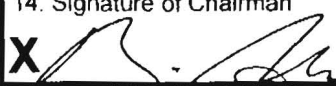
RECEIVED
2015 OCT -2 AM 10:21

CHECK APPROPRIATE BOX:

OFFICE USE ONLY

Original Appointment of Treasurer
 Reappointment of Treasurer
 Deputy Treasurer

| | | | |
|---|--|---|-----------------------|
| 1. Committee or Organization People For Better Leaders | | 2. Telephone (786) 224-4947 | |
| 3. Name of Treasurer or Deputy Treasurer Brian George | | 4. Email (optional) () | |
| 5. Telephone (optional) () | | | |
| 6. Mailing Address 2000 Ponce DeLeon Blvd, 6th Floor Coral Gables, FL 33134 | | | |
| 7. Street Address 2000 Ponce DeLeon Blvd, 6th Floor Coral Gables, FL 33134 | | | |
| 8. The following bank has been designated as the <input checked="" type="checkbox"/> Primary Depository <input type="checkbox"/> Secondary Depository | | | |
| 9. Name of Bank Sabadell United Bank | | 10. Street Address 1111 Brickell Ave | |
| 11. City Miami | | 12. State FL | 13. Zip Code 33131 |

| | |
|---|---|
| 14. Signature of Chairman X  | 15. Name of Chairman (Print or Type) Brian Abraham |
|---|---|

Campaign Treasurer's Acceptance of Appointment

I, Brian George, do hereby accept the appointment as
(Please Print or Type)
 treasurer or deputy treasurer for People For Better Leaders
(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.

9/24/15 **X** 
 Date Signature of Campaign Treasurer or Deputy Treasurer

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

OFFICE USE ONLY

RECEIVED
2015 OCT -2 AM 10:21

- Original Appointment Change of Appointment
 Change of Mailing Address Change of Physical Address

Registered Agent and Office Information

Name **Brian Abraham** Telephone **305 505-6037**

Street Address **1320 S Dixie Hwy Suite 241**

City **Coral Gables** State **FL** Zip Code **33146**

Mailing Address **1320 S Dixie Hwy Suite 241**

City **Coral Gables** State **FL** Zip Code **33146**

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


Signature of Registered Agent

9/24/2015
Date

Former Registered Agent and Office Information (for changes only)

Name Telephone

Street Address


City State Zip Code

Committee or Organization Information

Name of Committee or Organization
People For Better Leaders

Street Address **1320 S Dixie Hwy Suite 241** Telephone **305 505-6037**

City **Coral Gables** State **FL** Zip Code **33146**


Signature of Chairperson

Brian Abraham
Printed Name of Chairperson

9/24/2015
Date



FLORIDA DEPARTMENT *of* STATE

RICK SCOTT
Governor

KEN DETZNER
Secretary of State

October 6, 2015

Brian Abraham, Chairperson
People For Better Leaders
1320 South Dixie Highway Suite 241
Coral Gables, Florida 33146

Dear Mr. Abraham:

This will acknowledge receipt of the Statement of Organization and Appointment of Campaign Treasurer and Designation of Campaign Depository for **People For Better Leaders**, which were placed on file in our office on October 2, 2015. 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 **November 10, 2015**. The report will cover the period of October 1-31, 2015 (M10). 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: 64958



Brian Abraham, Chairperson
October 5, 2015
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, a confidential pin number to access the EFS was sent to the 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.

Brian Abraham, Chairperson
October 5, 2015
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: Brian George, Treasurer



FLORIDA DEPARTMENT OF STATE

Ken Detzner
Secretary of State

DIVISION OF ELECTIONS

July 6, 2016

Brian George, Treasurer
People for Better Leaders
2000 Ponce DeLeon Boulevard
6th Floor
Coral Gables, FL 33134

PAC 64958

Dear Mr. George:

The notification that you had no reportable activity for the report deadline of July 1, 2016, was not filed until July 2, 2016. Although the notification is late, no automatic fine is assessed because you had no receipts or expenditures during this reporting period.

However, to avoid potential issues in the future, please note that state law (s. 106.07(7), Fla. Stat.) requires you to file by the dates set out also in law, either a campaign finance report or if applicable, a notification that no reportable activity occurred for the reporting period. Failure to do may constitute a violation of sections 106.07(1) and 106.19(1)(c), Fla. Stat. The Division is required to notify the Florida Elections Commission of any apparent violation of chapter 106, Fla. Stat., or any failure to file a report or information required by chapter 106, Fla. Stat. If a matter is referred to the Florida Elections Commission, the Commission may assess a civil penalty of up to \$1,000 per violation.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Kristi Reid Bronson".

Kristi Reid Bronson, Chief
Bureau of Election Records

cc: Brian Abraham, Chairperson

 **Treasurer Report Status**

ID: **64958** Name: **People for Better Leaders**

Report: 2016 - P1 - 9

Print Date: **8/31/2016 4:03:50 PM**

Election: 2016 General Election

Covers: 6/1/2016-6/24/2016

Amended Waiver

Due: 7/1/2016

Filed: **7/2/2016 7:46:41 AM**

File Status: **Filed Report**

Reviewed: **7/2/2016**

Review Status: **Reviewed**

Detail Complete: **No Detail Records Found**

File Method: Web Filed

Entry Method: Web Data Entry

Pending Queued Items: **0**

Number of Detail Records

Contributions: 0

Expenditures: 0

Fund Transfers: 0

Distributions: 0

To Print Report: Right Click Mouse and Select 'Print'



FLORIDA DEPARTMENT OF STATE

Ken Detzner
Secretary of State

DIVISION OF ELECTIONS

August 1, 2016

Brian George, Treasurer
People for Better Leaders
2000 Ponce DeLeon Boulevard
6th Floor
Coral Gables, FL 33134

PAC 64958

Dear Mr. George:

The notification that you had no reportable activity for the report deadline of July 15, 2016, was not filed until July 27, 2016. Although the notification is late, no automatic fine is assessed because you had no receipts or expenditures during this reporting period.

However, to avoid potential issues in the future, please note that state law (s. 106.07(7), Fla. Stat.) requires you to file by the dates set out also in law, either a campaign finance report or if applicable, a notification that no reportable activity occurred for the reporting period. Failure to do may constitute a violation of sections 106.07(1) and 106.19(1)(c), Fla. Stat. The Division is required to notify the Florida Elections Commission of any apparent violation of chapter 106, Fla. Stat., or any failure to file a report or information required by chapter 106, Fla. Stat. If a matter is referred to the Florida Elections Commission, the Commission may assess a civil penalty of up to \$1,000 per violation.

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

Sincerely,

Kristi Reid Bronson, Chief
Bureau of Election Records

cc: Brian Abraham, Chairperson

 **Treasurer Report Status**

ID: **64958** Name: **People for Better Leaders**

Report: 2016 - P2 - 11

Print Date: **8/31/2016 4:04:05 PM**

Election: 2016 General Election

Covers: 7/2/2016-7/8/2016

Due: 7/15/2016

Amended Waiver

Filed: **7/27/2016 1:30:54 AM**

File Status: **Filed Report**

Reviewed: **7/27/2016**

Review Status: **Reviewed**

Detail Complete: **No Detail Records Found**

File Method: Web Filed

Entry Method: Web Data Entry

Pending Queued Items: **0**

Number of Detail Records

Contributions: 0

Expenditures: 0

Fund Transfers: 0

Distributions: 0

To Print Report: Right Click Mouse and Select 'Print'



FLORIDA DEPARTMENT OF STATE

Ken Detzner
Secretary of State

DIVISION OF ELECTIONS

August 1, 2016

Brian George, Treasurer
People for Better Leaders
2000 Ponce DeLeon Boulevard
6th Floor
Coral Gables, FL 33134

PAC 64958

Dear Mr. George:

The notification that you had no reportable activity for the report deadline of July 22, 2016, was not filed until July 27, 2016. Although the notification is late, no automatic fine is assessed because you had no receipts or expenditures during this reporting period.

However, to avoid potential issues in the future, please note that state law (s. 106.07(7), Fla. Stat.) requires you to file by the dates set out also in law, either a campaign finance report or if applicable, a notification that no reportable activity occurred for the reporting period. Failure to do may constitute a violation of sections 106.07(1) and 106.19(1)(c), Fla. Stat. The Division is required to notify the Florida Elections Commission of any apparent violation of chapter 106, Fla. Stat., or any failure to file a report or information required by chapter 106, Fla. Stat. If a matter is referred to the Florida Elections Commission, the Commission may assess a civil penalty of up to \$1,000 per violation.

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

Sincerely,

Kristi Reid Bronson, Chief
Bureau of Election Records

cc: Brian Abraham, Chairperson

 Treasurer Report Status

ID: **64958** Name: **People for Better Leaders**

Report: 2016 - P2A - 12

Print Date: **8/31/2016 4:04:21 PM**

Election: 2016 General Election

Covers: 7/9/2016-7/15/2016

Amended Waiver

Due: 7/22/2016

Filed: **7/27/2016 1:31:42 AM**

File Status: **Filed Report**

Reviewed: **7/27/2016**

Review Status: **Reviewed**

Detail Complete: **No Detail Records Found**

File Method: Web Filed

Entry Method: Web Data Entry

Pending Queued Items: **0**

Number of Detail Records

Contributions: 0

Expenditures: 0

Fund Transfers: 0

Distributions: 0

To Print Report: Right Click Mouse and Select 'Print'



FLORIDA DEPARTMENT OF STATE

Ken Detzner

Secretary of State

DIVISION OF ELECTIONS

August 30, 2016

Brian George, Treasurer
People for Better Leaders
2000 Ponce DeLeon Boulevard
6th Floor
Coral Gables, FL 33134

PAC 64958

Dear Mr. George:

The notification that you had no reportable activity for the report deadline of August 19, 2016, was not filed until August 24, 2016. Although the notification is late, no automatic fine is assessed because you had no receipts or expenditures during this reporting period.

However, to avoid potential issues in the future, please note that state law (s. 106.07(7), Fla. Stat.) requires you to file by the dates set out also in law, either a campaign finance report or if applicable, a notification that no reportable activity occurred for the reporting period. Failure to do may constitute a violation of sections 106.07(1) and 106.19(1)(c), Fla. Stat. The Division is required to notify the Florida Elections Commission of any apparent violation of chapter 106, Fla. Stat., or any failure to file a report or information required by chapter 106, Fla. Stat. If a matter is referred to the Florida Elections Commission, the Commission may assess a civil penalty of up to \$1,000 per violation.

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

Sincerely,

Kristi Reid Bronson, Chief
Bureau of Election Records

cc: Brian Abraham, Chairperson

 Treasurer Report Status

ID: **64958** Name: **People for Better Leaders**

Report: 2016 - P6 - 16

Print Date: **8/31/2016 4:04:39 PM**

Election: 2016 General Election

Covers: 8/6/2016-8/12/2016

Amended Waiver

Due: 8/19/2016

Filed: **8/24/2016 10:55:46 PM**

File Status: **Filed Report**

Reviewed: **8/24/2016**

Review Status: **Reviewed**

Detail Complete: **No Detail Records Found**

File Method: Web Filed

Number of Detail Records

Entry Method: Web Data Entry

Contributions: 0

Expenditures: 0

Pending Queued Items: **0**

Fund Transfers: 0

Distributions: 0

To Print Report: Right Click Mouse and Select 'Print'