

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Lisa Davidson

Case No.: FEC 16-756

TO: Lisa Davidson
219 Sauers Avenue
Johnstown, PA 15906

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, **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.

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Lisa Davidson

Case No.: FEC 16-756

STAFF RECOMMENDATION FOLLOWING INVESTIGATION

Pursuant to Section 106.25(4)(c), Florida Statutes, undersigned counsel files this written recommendation for disposition of the referral in this case recommending that there is **no probable cause** to charge Respondent with violating **Section 106.07(2)(b)1.**, or **106.09(1)(b)**, Florida Statutes. Based upon a thorough review of the Report of Investigation submitted on June 16, 2017, the following facts and law support this staff recommendation:

1. On December 7, 2016, the Florida Elections Commission ("Commission") received a referral from the Division of Elections ("Division") alleging Lisa Davidson ("Respondent") violated Chapter 106, Florida Statutes.

2. Respondent was campaign treasurer for Laurel S. Bennett, a 2016 candidate for State Representative, District 86. An Appointment of Campaign Treasurer and Designation of Campaign Depository for Candidates form ("DS-DE 9") appointing Respondent as Ms. Bennett's treasurer was filed with the Division on September 17, 2015. (ROI Exhibit 1)¹

3. By letter dated February 16, 2017, the Executive Director notified Respondent that Commission staff would investigate the following statutory provision:

Section 106.07(2)(b)1., Florida Statutes: Respondent, treasurer for Laurel Bennett, a 2016 candidate for the office of State Representative, failed to timely make necessary amendments to the campaign's 2016 M5 treasurer's report, as alleged in the complaint.

Section 106.09(1)(b), Florida Statutes: Respondent, treasurer for Laurel Bennett, a 2016 candidate for the office of State Representative, accepted one or more cash contributions in excess of the \$50 per campaign limit, as alleged in the complaint.

4. By letter dated September 18, 2015, Kristi Reid Bronson, Division of Elections, Chief, Bureau of Election Records, acknowledged receipt of the DS-DE 9 that was filed with the Division on September 17, 2015. The letter also contained a security envelope containing the candidate's confidential PIN number to access the Division's electronic filing system. A copy of this notification was sent to Respondent. (ROI Exhibit 2)

¹ The Report of Investigation shall be referred to herein as "ROI."

5. Ms. Bronson's September 18, 2015, letter also indicated that all of the Division's publications and reporting forms were available on the Division's website, including Chapters 104 and 106, Florida Statutes, the *Candidate and Campaign Treasurer Handbook*, and the *Calendar of Reporting Dates*. The letter provided specific notice of the responsibility to read, understand, and follow the requirements of Florida's election laws. (*Id.*)

6. The *Candidate and Campaign Treasurer Handbook* states at Chapter 10, page 24, that, "A candidate may accept contributions via a credit card or debit card. These contributions are categorized as a 'check' for reporting purposes." (ROI Exhibit 3, page 6)

7. The campaign's 2016 M5 report covering the dates of May 1, 2016, through May 31, 2016, was due on June 10, 2016. Respondent filed the 2016 M5 report on June 17, 2016. Furthermore, the report was incomplete. (ROI Exhibit 9 and Exhibit 13)

8. On July 28, 2016, the Division sent Respondent a letter notifying her that the campaign's 2016 M5 report was incomplete and that Respondent had seven days to correct the errors or provide the missing information noted in the attached Error Report. The letter also stated that if the information was reported accurately, Respondent should provide a written explanation to the Division addressing the issues noted in the Error Report attached to the notification letter. (ROI Exhibit 13)

9. The Division's notification required written explanation for five contributions that were reported as having been made in cash and were above the \$50.00 cash contribution limit. Also, the address for contributor Nancy Elliot was not provided. The following table identifies the five contributions at issue:

| TABLE 1: RESPONDENT'S 2016 M5 CTR – ITEMIZED CONTRIBUTIONS AT ISSUE | | | | | |
|--|---|--------------------|-------------------------|------------------------------|---------------|
| Date | Full Name Street Address & City, State, Zip Code | Contributor | | Contribution Type | Amount |
| Sequence # | | Type | Occupation | | |
| 05/28/16 7 | Matthews, James 1350 SW 26 th Ave. Boynton Beach, FL 33426 | I | Facilities | CAS | \$100.00 |
| 05/08/16 4 | Davidson, Lisa 2806 Clearwater Terrace SE Conyers, GA 30013 | I | Retired | CAS | \$100.00 |
| 05/12/16 3 | Balaban, Boris 147 Roycourt Circle Royal Palm Beach, FL 33411 | I | Telecommunica- tions | CAS | \$500.00 |
| 05/13/16 1 | Matteolia, Matty 475 Greenway Blvd. Royal Palm Beach, FL 33411 | I | Mayor | CAS | \$100.00 |
| 05/23/16 8 | Elliott, Nancy Oklahoma City, OK | I | Aircraft Mechanic | CAS | \$100.00 |

10. On August 3, 2016, Respondent filed an amended 2016 M5 report in which she changed the contribution types for the five contributions at issue from cash to check for four of the contributions and from cash to money order for the contribution from Matty Matteolia and provided the address for Nancy Elliott. This amendment was thus made within seven days of the date that the initial notice of the need to amend the report was mailed to Respondent by the Division. (ROI Exhibit 6, page 6; and Exhibit 7)

11. On August 15, 2016, the Division sent Respondent a second notice that the campaign's 2016 M5 report remained incomplete and required amendment. The notice included an Error Report that stated, "Cash contributions changed to check, written explanation required." (ROI Exhibit 14)

12. On August 26, 2016, the Division received Respondent's response to the second notice. Respondent stated, "You told me I couldn't put them in as cash even though they were, so I put them in as checks. What was I supposed to do!" (ROI Exhibit 4, page 2)

13. On September 19, 2016, the Division received Respondent's second response to the second notice. Respondent stated, "I sent a written explanation to you last month. I put these in as cash that went to a campaign fund online. You told me I couldn't put the actual \$100.00 amounts in as cash, so I changed them to checks. What else do you want me to do." (ROI Exhibit 5, page 2)

14. On September 20, 2016, the Division sent Respondent a letter marked "Final Notice" via certified mail with delivery confirmation notifying Respondent that the campaign's 2016 M5 report remained incomplete and required amendment. The Division included notes that Respondent needed to provide a signed written response and show that the cash contributions over \$50 had been refunded. (ROI Exhibit 15)

15. On September 23, 2016, Respondent filed an amended 2016 M5 report in which she changed the contribution types back to cash. (ROI Exhibit 6, page 9; and Exhibit 7)

16. The Division stated in an email dated June 14, 2017, that there were still issues with the campaign's 2016 M5 report. Specifically, the Division stated, "The errors were cash contributions, which should have been returned when the candidate was notified of the problem and then updated the report appropriately. The contributions were never returned...The issues that remain are that 1) they accepted excessive cash contributions and failed to return them; and 2) failed to timely file an amendment or correction within the 7 days of receipt of the Division's letter." (ROI Exhibit 23)

17. In response to the complaint, Respondent stated that she has tried to amend the report at issue with the information provided to her by the candidate, which the candidate did not always provide in a timely manner. Respondent stated that the contributions at issue were through a campaign contribution website that was linked to the campaign account, and that nothing was cash money. Respondent stated she did not know how to input the contributions except as cash. She further stated that when she was told that cash contributions could not exceed \$50, she spoke to the candidate, who instructed her to change them to checks. Respondent did so, and was again

told by the Division not to do that and to refund the excess money. The candidate told Respondent that there was nothing to refund since it was not actual cash. (ROI Exhibit 20)

18. Respondent attested in an affidavit that the candidate was campaigning in Florida while Respondent was in the candidate's home in Georgia as a caregiver, which created delays in the receipt of campaign account information. Respondent reiterated that the contributions at issue were not cash contributions. Rather, they were donations through a campaign website. However, Respondent input them as cash because she did not know how to input them otherwise. The Division told her that she could not do that, so she spoke to the candidate, who instructed her to change them to checks. Respondent did so, and she was then told by the Division that she could not do that and had to input them as refunds. Respondent stated that, "...at this point I was very confused as to what I was doing." The candidate told Respondent that she could not refund the money because it was not actual cash money since they were contributions to the website. (ROI Exhibit 21)

19. The candidate, Laurel Bennett, was asked about the five contributions at issue. She confirmed via email that none of them was a cash contribution. Rather, they were either checks or donations through the website. Ms. Bennett also confirmed this during a telephonic interview. (ROI Exhibit 11, page 2; and Attachment A)

20. Ms. Bennett provided a screenshot from a website called Raise the Money showing four of the five contributions at issue. The only contribution unaccounted for was \$100 from Matty Matteolia. (ROI Exhibit 18, page 1)²

21. Ms. Bennett provided an image of a bank deposit slip for a check in the amount of \$100 dated January 6, 2016, with the hand-written notation, "Matty" on it as evidence that the \$100 contribution from Matty Matteolia reported as having been received on May 13, 2016, was not a cash contribution. Ms. Bennett was unable to explain why the check contribution was reported on her 2016 M5 report. She stated, "It is what it is." Ms. Bennett stated she could not locate another check from Mr. Matteolia. (ROI Exhibit 11, page 3; and Exhibit 19, page 1)

22. Matty Matteolia stated in a telephonic interview that he is uncertain of the date and amount of contributions he made to Ms. Bennett's campaign but recalled contributing to her campaign. (Attachment B)

23. Section 106.07(2)(b)1., Florida Statutes, requires that, within seven days of receipt of notification from the filing officer that a report is incomplete and requires amendment, a treasurer must file an addendum to the report providing all information necessary to complete the report.

² The contributors and amounts of the contributions coincide with those listed on the 2016 M5 report, but the dates of the contributions do not. The 2016 M5 report disclosed the contributions as having been received throughout May, 2016, but the screenshot shows dates ranging throughout June 2016. Ms. Bennett explained in a telephonic interview that it was very difficult to get Raise the Money to release funds to her campaign account, which could explain the difference in dates. Regardless of the dates of contributions, which were not at issue in the Division's error report, the screenshot is evidence that the four contributions listed were not cash contributions. (ROI Exhibit 11, pages 2-3)

24. Section 106.09(1)(b), Florida Statutes, prohibits a person from accepting an aggregate cash contribution or contribution by means of a cashier's check from the same contributor in excess of \$50 per election.

25. Based upon the information above, it appears that the contributions at issue were not cash contributions but were made by check or money order. Further, it appears that Respondent filed an amended 2016 M5 report correcting the errors identified by the Division within seven days of the initial notice of the need to amend the report.

26. "Probable Cause" is defined as a 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).

27. The above facts show that Respondent was campaign treasurer for Laurel S. Bennett, a 2016 candidate for State Representative, District 86. The campaign's 2016 M5 report was filed incomplete. The Division sent Respondent notice of the need to amend the report and provide explanation for five excessive cash contributions. However, the evidence and testimony provided by candidate Bennett and contributor Matteolia provide reason to believe that the contributions were actually made by check or money order, not cash. Therefore, there is not sufficient evidence to reasonably conclude that Respondent accepted excessive cash contributions.

28. The above facts also show that Respondent filed an amended 2016 M5 report within seven days of the date that the initial notice was sent to her by the Division. In the amended report, Respondent changed the contribution types of the excessive cash contributions to check or money order and provided the missing address. The Division rejected these amendments and sent Respondent two subsequent notices requiring amendment to the 2016 M5 report. Based on Respondent's contemporaneous responses to the Division's notices and her responses to this complaint, it appears that Respondent was confused as to what kind of contributions the five at issue were and how to enter them into the Division's electronic filing system. In her responses to the Division, Respondent insisted that the contributions were cash. But in her responses to the complaint, Respondent explained that the contributions were not cash. Regardless of the confusion on the part of Respondent, evidence obtained during the investigation has provided reason to believe that the contributions at issue were not made in cash, which means that Respondent's initial timely amendment of the 2016 M5 was correct.

Based upon these facts and circumstances, I recommend that the Commission find no probable cause to charge Respondent with violation of Section 106.07(2)(b)1., or 106.09(1)(b), Florida Statutes.

Respectfully submitted on July 19, 2017,

Cole H. Kekelis

Cole H. Kekelis
Assistant General Counsel

I reviewed this Staff Recommendation this 19th day of July 2017.

Amy McKeever Toman

Amy McKeever Toman
Executive Director



RE: Case No.: FEC 16-756

Laurel@PHR Solutions

to:

'Helen Hinson'

06/26/2017 08:48 AM

Hide Details

From: "Laurel @ PHR Solutions" <laurel.bennett@phrsolutions.org>

To: "'Helen Hinson'" <Helen.Hinson@myfloridalegal.com>

I just saw this...no cash contributions were made...either they were checks or donations through the web site..

Laurel

"Procrastination is the thief of opportunity."

<mailto:Laurel.Bennett@PHRSolutions.org>

www.PHRsolutions.org

From: Helen Hinson [<mailto:Helen.Hinson@myfloridalegal.com>]

Sent: Tuesday, June 06, 2017 6:13 PM

To: laurel.bennett@phrsolutions.org

Subject: Case No.: FEC 16-756

Laurel S. Bennett
2016 candidate for State Representative, District 86

Dear Ms. Bennett:

As we discussed by phone, please confirm the contributions were made through your campaign website and were not cash contributions to your 2016 campaign as identified as follows:

May 28, 2016, from James Matthews in the amount of \$100.00;

May 8, 2016, from Lisa Davidson in the amount of \$100.00;

May 12, 2016, Boris Balaban in the amount of \$500.00;

May 13, 2016, Matty Matteolia in the amount of \$100.00;

May 23, 2016, Nancy Elliott in the amount of \$100.00.

Thank you in advance for your assistance in resolving this matter. **Please confirm your receipt of this email communication.**

Helen Hinson

Investigation Specialist

Florida Elections Commission

The Collins Building, Ste. 224

107 West Gaines Street

Tallahassee, FL 32399-1050

helen.hinson@myfloridalegal.com

PH: 850.922.4539, extension 115

FAX: 850.921.0783

www.fec.state.fl.us

Please note: Florida has a very broad public records law. Written communications to or from me regarding state business constitute public records and are available to the public and media upon request **unless** the information is subject to a specific statutory exemption. Therefore, your e-mail message may be subject to public disclosure.

ATTACHMENT A

Florida Elections Commission Post Investigation Telephone Log

| | |
|----------------------------------|--|
| Case Number | FEC 16-756 |
| Respondent | Lisa Davidson |
| Complainant | Division of Elections |
| Date of Call | 07/18/17 |
| Time of Call | 11:50 a.m. |
| Name of Individual Called | (Former Mayor) Matty Mattioli, Village of Royal Palm Beach, FL |
| Phone Number | 561-315-6384 |
| Summary | <p>I phoned to verify the date, number and amount of contributions he made to Laurel Bennett's 2016 campaign; he said he and Ms. Bennett have been friends since she ran against him for Mayor in 2012; he is uncertain of the date and amount of contributions he made to her campaign but recalls contributing to her campaign and was invited to and attended several campaign functions. Mayor Mattioli said Laurel Bennett didn't know how to lie and couldn't if she wanted to. He acknowledged because of issues with her ill husband (disabled Vietnam veteran with disease complications from Agent Orange exposure) who is living in Georgia, she may have hung on to a contribution longer before depositing it and/or reporting it since she travels from Florida to Georgia very frequently due to her husband's illness.</p> |
| Entered by | HH |

ATTACHMENT B

RECEIVED

6/26/16

Dear Helen,

2017 JUN 29 A 10:29

Again, I completed the campaign report m5 as I thought was correct, when I received the letter it was incorrect and I could not put the entries in as cash above \$100.00 I contacted the candidate she said put them in as ^{not} cash but checks, so I did. Considering these contributions came in thru the website I did not consider them cash as the candidate did not either.

This was not her first campaign run, I thought she would know better than I how to input monies into the website.

Your candidate handbook is overwhelming to the first time Treasurer, you can't remember all that is included. I will never do this for anyone again.

I did what I thought was correct after consulting the candidate.

Piia Davidson.

Case No:
FEC 16-756

FLORIDA ELECTIONS COMMISSION
REPORT OF INVESTIGATION
Case No.: FEC 16-756

Respondent: Lisa Davidson
Counsel for Respondent: None

Complainant: Division of Elections
Counsel for Complainant: None

Pursuant to Section 106.25, Florida Statutes, on December 7, 2016, the Florida Elections Commission (“Commission”) received information from the Division of Elections (“DOE”) alleging that Respondent violated Chapter 106, Florida Statutes. Commission staff investigated whether Respondent violated the following statutes:

Section 106.07(2)(b)1., Florida Statutes, failure of the treasurer of a candidate to timely file an addendum to an incomplete report after receiving notice from the filing officer; and

Section 106.09(1)(b), Florida Statutes, prohibiting a person from accepting a contribution in the aggregate in cash in excess of \$50.

I. Preliminary Information:

1. Respondent was a first-time campaign treasurer. On September 15, 2015, she accepted appointment as campaign treasurer for Laurel S. Bennett, 2016 candidate for State Representative, District 86 (covering part of Palm Beach County). Respondent is unemployed. To review her Form DS-DE 9, refer to Exhibit 1.

2. Complainant is the DOE.

3. Respondent’s filing officer was Kristi Reid Bronson, Chief, Bureau of Elections Records. Respondent was required to file campaign finance reports with the DOE.

4. On September 17, 2015, Ms. Bennett filed the Appointment of Campaign Treasurer and Designation of Campaign Depository with the DOE, and became a 2016 candidate. To review her Form DS-DE 9, refer to Exhibit 1.

5. By letter dated September 18, 2015, Ms. Bronson acknowledged receipt of the Appointment of Campaign Treasurer and Designation of Campaign Depository, and indicated Ms. Bennett’s name was placed on the 2016 active candidate list. Her letter advised the reader “all candidates who file reports with the DOE are required to file by means of the DOE’s Electronic Filing System (EFS).” To review the acknowledgment letter, refer to Exhibit 2.

6. The letter also advised Ms. Bennett that all the Division’s publications and reporting forms are available on its website, including Chapter 106, Florida Statutes, the *Candidate*

and *Candidate and Campaign Treasurer Handbook*, and the Calendar of Reporting Dates. The letter further advised Ms. Bennett that it was her responsibility to read, understand, and follow the requirements of Florida's election laws. Respondent was sent a copy of the letter. (Note this paragraph appears in bold font.) To review the acknowledgement letter, refer to Exhibit 2.

7. In the June 2015 *Candidate and Campaign Treasurer Handbook*, Chapter 10, "Contributions," on page 24 with the heading, "Debit and Credit Card Contributions, it says, "A candidate may accept contributions via a credit card or debit card. These contributions are categorized as a 'check' for reporting purposes." To review the relevant page of the *Candidate and Campaign Treasurer Handbook*, refer to Exhibit 3.

II. Alleged Violation of Section 106.07(2)(b)1., Florida Statutes:

8. I investigated whether Respondent violated this section of the election laws by failing to file an addendum to the 2016 M5 Report (covering the reporting period of May 1 through 31, 2016), after receiving notice from the filing officer.

9. Complainant alleges as of December 6, 2016, the 2016 M5 Report remains incomplete.

10. The following table identifies the five contributions at issue.

| TABLE 1: RESPONDENT'S 2016 M5 CTR – ITEMIZED CONTRIBUTIONS AT ISSUE | | | | | |
|--|---|--------------------|-------------------------|------------------------------|---------------|
| Date | Full Name Street Address & City, State, Zip Code | Contributor | | Contribution Type | Amount |
| Sequence # | | Type | Occupation | | |
| 05/28/16 7 | Matthews, James 1350 SW 26 th Ave. Boynton Beach, FL 33426 | I | Facilities | CAS | \$100.00 |
| 05/08/16 4 | Davidson, Lisa 2806 Clearwater Terrace SE Conyers, GA 30013 | I | Retired | CAS | \$100.00 |
| 05/12/16 3 | Balaban, Boris 147 Roycourt Circle Royal Palm Beach, FL 33411 | I | Telecommunica- tions | CAS | \$500.00 |
| 05/13/16 1 | Matteolia, Matty 475 Greenway Blvd. Royal Palm Beach, FL 33411 | I | Mayor | CAS | \$100.00 |
| 05/23/16 8 | Elliott, Nancy Oklahoma City, OK | I | Aircraft Mechanic | CAS | \$100.00 |

11. I secured two error reports from the DOE's website identified as "Response to Audit Letter." Each error report is marked with handwritten remarks in cursive writing, and includes the DOE's letter dated August 15, 2016 addressed to Respondent in Georgia, and marked

“Second Notice.” Respondent’s first response was filed with the DOE on August 26, 2016; her second response was filed with the DOE on September 19, 2016. Each response by Respondent will be discussed in greater detail in the following paragraphs. To review the relevant letters and error reports filed by Respondent, refer to Exhibits 4 and 5.

12. The following table identifies the timeline of events related to the 2016 M5 Report. To review the 2016 M5 Report, refer to Exhibit 6. To review the Queued Items for the 2016 M5 Report, refer to Exhibit 7. To review the History Notes (electronic communications log), refer to Exhibit 8. To review the Filing History and Campaign Finance Activity, refer to Exhibits 9 and 10, respectively. [Note: information appearing in parentheses in Table 2 in the column marked “Event” identifies the relevant DOE staff member by first and middle initials and last name who completed the relevant event, and is marked by a single asterisk (“*”).] [Note: events marked by a double asterisk (“**”) identify amendments filed with the DOE that are not reflected in the 2016 M5 Report itemized contributions page provided by the DOE (Exhibit 11, entry number 13).]

| TABLE 2: TIME LINE OF EVENTS AND EVIDENCE PROFFERED | | |
|--|---|---|
| Date | Event | Evidence |
| 06/10/16 | 2016 M5 Report due | Calendar of Reporting Dates (Exhibit 12) |
| 06/17/16 | Filed 2016 M5 Report (05/01 to 05/31/16). (Exhibit 6) | Queued Items (Exhibit 7) |
| 06/21/16 | Respondent filed 2016 M5 Report Amendment | Queued Items (Exhibit 7) |
| 07/05/16 | DOE staff reviewed filed report (ejrowlette)* | Queued Items (Exhibit 7) |
| 07/26/16 | DOE staff reviewed filed report (krbronson)* | Queued Items (Exhibit 7) |
| 07/28/16 | First Notice sent to Respondent at GA address. Respondent is directed to amend the report or provide missing information. If the information is reported accurately, Respondent is directed to provide a written explanation. The enclosed error report identified five contributions, Type “CAS,” and indicated, “*Cash Contributions May Not Exceed \$50 – Written Explanation Required.” | Notice included error report (Exhibit 13). Amendment due 7 days after receipt of notice |
| 08/03/16 | Respondent filed 2016 M5 Report Amendment** | Queued Items (Exhibit 7) |
| 08/12/16 | DOE staff reviewed filed report (zjsantos)* | Queued Items (Exhibit 7) |

| | | |
|----------|--|--|
| 08/15/16 | Second Notice sent to Respondent at GA address. The letter said, "Our records indicate that changes to the report were made, however, the reports are still incomplete. Enclosed is a second error report..." The error report identified five contributions, Type "CAS," and indicated, " *Cash Contributions May Not Exceed \$50 – Written Explanation Required. " The error report included a hand-written notation made by DOE staff, "8/15/16 *Cash contributions changed to check, written explanation required." | Notice included error report with notation (Exhibit 14). Amendment due 7 days after receipt of notice |
| 08/22/16 | Respondent filed amended 2016 M5 Report** | Queued Items (Exhibit 7) |
| 08/26/16 | Respondent filed written explanation with the DOE. She enclosed a copy of the DOE's letter dated August 15, 2016, and marked " Second Notice "; at the bottom of the letter appears a handwritten message in cursive writing, "see attached." Respondent also filed a copy of the first error report with added hand-written remarks in cursive writing, "You told me I couldnt [sic] put them in as cash even though they were, so I put them in as checks. What was I supposed to do!" | (Exhibit 4) |
| 09/12/16 | DOE staff reviewed filed report (zjsantos)* | Queued Items (Exhibit 7) |
| 09/19/16 | Respondent filed second response with the DOE. Respondent filed the letter marked Second Notice and included the second error report with added hand-written remarks in cursive writing, "I sent a written explanation to you last month. I put these in as cash that went to a campaign fund online. You told me I couldnt [sic] put the actual \$100.00 amounts in as cash, so I changed them to checks. What else do you want me to do." | (Exhibit 5). |
| 09/20/16 | FINAL NOTICE sent to Respondent at GA address with delivery confirmation. The notice included an error report identifying five contributions, Type "CAS," and indicated, " *Cash Contributions May Not Exceed \$50 – Written Explanation Required. " The error report included hand-written remarks made by DOE staff: " *9/20/16 Written Received but needs to be signed, and need to show the refunds [sic] of the cash contributions"; and " 8/15/16 *Cash contributions changed to check, written explanation required." Respondent's handwritten remarks in cursive writing appear below: "You told me I couldnt [sic] put them in as cash even though they were, so I put them in as checks. What was I supposed to do!" | Notice included error report with hand-written remarks. Exhibit 15. Amendment due 7 days after receipt of notice |
| 09/22/16 | FINAL NOTICE – Delivery confirmed (Exhibit 16) | Amendment due 7 |

| | | days after receipt of notice |
|----------|---|------------------------------|
| 09/23/16 | Respondent filed 2016 M5 Report Amendment** | Queued Items (Exhibit 7) |
| 10/18/16 | Respondent filed 2016 M5 Report Amendment** | Queued Items (Exhibit 7) |
| 12/06/16 | DOE staff review filed report (ejrowlette)* | Queued Items (Exhibit 7) |
| 12/07/16 | Complaint filed by the DOE (krbronson)* | (Exhibit 17) |
| 04/06/16 | Respondent filed 2016 M5 Report Amendment** | Queued Items (Exhibit 7) |

13. On June 6, 2017, by telephone, candidate Laurel S. Bennett confirmed the contributions at issue were not cash contributions; all contributions at issue were made by check or through her campaign website. To review the phone log, refer to Exhibit 11, entry number 5.

14. On June 7, 2017, by email, Ms. Bennett provided a snapshot of campaign contributions made using Raise The Money software on her campaign website during the relevant reporting period. The contributions identified in the Raise The Money statement included James Matthews (\$100); Respondent Lisa Davidson (\$100); Boris Balaban (\$500); and Nancy Elliott (\$100). She also provided a snapshot of a bank receipt for \$100.00 dated 01/06/2016 by email, with her handwritten notation, "Matty." To review Ms. Bennett's emails, refer to Exhibits 18 and 19.

15. By email dated December 22, 2016, in response to the instant complaint, Respondent explained she had made attempts to amend the 2016 M5 Report with the information provided to her by the candidate, Laurel S. Bennett. The contributions at issue were made through the candidate's campaign website and linked to her campaign account. The contributions at issue were not cash contributions. Respondent declared she did not know how to disclose the contributions; therefore, she had entered the contributions at issue as cash contributions. Respondent indicated she was informed by Help Desk staff at the DOE that cash contributions could not exceed \$50.00. To review Respondent's email dated December 22, 2016, refer to Exhibit 20.

16. In her email, Respondent indicated she contacted the candidate, Ms. Bennett, who instructed her to change the cash contributions to check contributions. Respondent complied with Ms. Bennett's directive, but was contacted again by the DOE Help Desk staff, and informed she could not change the cash contributions to check contributions. Later, Respondent contacted the DOE Help Desk staff and was directed to refund the excess money. Ms. Bennett informed Respondent there was nothing to refund since it was not actual cash, and agreed to send the information to the DOE on multiple occasions. Ms. Bennett failed to provide the information to the DOE, and Respondent did not have access to the relevant information. To review Respondent's email dated December 22, 2016, refer to Exhibit 20.

17. By affidavit dated March 2, 2017, Respondent affirmed Ms. Bennett was in possession of the checkbook, the receipts needed to input the (campaign treasurer's) reports, bank statements, and did all the banking since they were in different states. Respondent explained Ms. Bennett would forward needed paperwork for each report to her (Respondent), but not always in a timely manner. To review her affidavit, refer to Exhibit 21.

18. By Affidavit of Background Information dated April 22, 2017, Respondent declared the notices provided by (the DOE) were sent to Respondent's former Florida address (after she moved to Georgia), and Respondent's ex-husband forwarded the notices "when he got around to it." She affirmed, "I never got them on time." (However, it appears the notices at issue were mailed to the Georgia address.) To review her affidavit, refer to Exhibit 22, paragraph number 16.

19. In her Affidavit of Background Information, Respondent affirmed the amendments to the 2016 M5 Report were not completed timely due to Respondent being in Georgia as caregiver to Ms. Bennett's terminally ill husband, Ms. Bennett being in Florida for her campaign, and Ms. Bennett not responding timely to Respondent's repeated requests for assistance by texts and emails. To review her affidavit, refer to Exhibit 22, paragraph number 14.

20. By Affidavit of Background Information, Respondent declared she mistakenly entered the campaign contributions made through Ms. Bennett's campaign website as cash contributions rather than as check contributions. To review her affidavit, refer to Exhibit 22, paragraph number 14. To review page 24 of the *Candidate and Campaign Treasurer Handbook* regarding disclosure of credit and debit card contributions, refer to Exhibit 3.

21. In her Affidavit of Background Information, Respondent affirmed she made a \$100 contribution identified as a cash contribution on the 2016 M5 Report through Ms. Bennett's campaign website using her/Respondent's debit card. Respondent indicated she moved to Pennsylvania in October 2016. To review her affidavit, refer to Exhibit 22, paragraph number 15.

22. By Affidavit of Background Information, Respondent confirmed she added handwritten remarks (in cursive writing) to two error reports provided by the DOE. (I had forwarded the error reports to Respondent, marked as Attachments A and B, and requested she identify who made the handwritten notations on the error reports.) To review her affidavit, refer to Exhibit 22, paragraph number 17. To review the error reports with Respondent's handwritten remarks, refer to Exhibits 4 and 5, respectively.

23. In her Affidavit of Background Information, Respondent declared she received the notices from Ms. Bronson with an error report; however, Ms. Bronson never provided an explanation about how to fix any errors identified on the error reports. Respondent also noted Ms. Bronson's staff were not always knowledgeable on how to "fix things." To review her affidavit, refer to Exhibit 22, paragraph numbers 18 and 19.

24. By Affidavit of Background Information, Respondent affirmed she did not understand her obligations and responsibilities as Ms. Bennett's campaign treasurer; Respondent and Ms. Bennett were always in different states during the campaign; and a lack of communication

between them was a significant factor resulting in the instant case. To review her affidavit, refer to Exhibit 22, paragraph number 20.

25. On June 14, 2017, by email, in response to my query regarding the status of the amendments to the 2016 M5 Report, Ms. Bronson said the issues that remain are the campaign accepted excessive cash contributions and failed to return them; and failed to timely file an amendment or correction within 7 days of receipt of the Division's letter. To review her email, refer to Exhibit 23.

26. It appears Respondent amended the 2016 M5 Report to accurately reflect check contributions rather than excessive cash contributions as she originally reported; however, her amendments were rejected by the DOE (Exhibits 18 and 19).

27. I found no record of previous complaints to indicate that Respondent has violated this section of Florida's election laws.

III. Alleged Violation of Section 106.09(1)(b), Florida Statutes:

28. I investigated whether Respondent violated this section of the election laws by accepting one or more cash contributions in excess of the \$50 per campaign limit.

29. Complainant alleged the excessive cash contributions identified in the 2016 M5 Report have not been reported refunded to the contributors.

30. To review information regarding this section of the election laws, refer to paragraphs 10 through 26 in this report of investigation ("ROI").

31. I found no record of previous complaints to indicate that Respondent has violated this section of Florida's election laws.

IV. FEC History:

32. Respondent has no history of additional complaints filed against her with the Commission at the time of this complaint.

Conclusion:

33. On June 15, 2017, I conducted an interview with Respondent by telephone, reviewed my findings with her, and gave her an opportunity to respond to the information gathered during the course of the investigation concerning the allegations made in the complaint against her; I reviewed the highlights of my ROI noting her original response was not received by the DOE within 7 days. Respondent said she called the Help Desk on multiple occasions, attempting to correct the errors; however, her efforts were hampered by the candidate having all the campaign finance records and Respondent having to wait for (candidate) Ms. Bennett to respond to her queries. I indicated her calls to the Help Desk were not noted by DOE staff on its History Notes; however, it appears her remarks on the error reports filed with the DOE confirm she had spoken with the DOE staff. Respondent said she was trying to help a friend and had to leave all the campaign records with Ms. Bennett when she moved from Florida, did her best as a first-time

treasurer, was overwhelmed by it all, and now she is concerned she may go to jail. I indicated this case is not criminal, but a civil penalty may be imposed by the Commission. To review the phone log, refer to Exhibit 11, entry number 14.

34. As previously discussed in this ROI in paragraph 6, by letter dated September 18, 2015, Ms. Bronson advised Ms. Bennett that all the Division's publications and reporting forms are available on its website, including Chapter 106, Florida Statutes, the *Candidate and Campaign Treasurer Handbook*, and the Calendar of Reporting Dates. The letter further advised Ms. Bennett that it was her responsibility to read, understand, and follow the requirements of Florida's election laws. Respondent was sent a copy of the letter. (Note this paragraph appears in bold font.) To review the acknowledgement letter, refer to Exhibit 2.

35. In her Affidavit of Background Information, Respondent affirmed she received the acknowledgment letter dated September 18, 2015 instructing her to print the following from the DOE's website: Chapter 106, Florida Statutes; the *Candidate and Campaign Treasurer Handbook*; and the Calendar of Reporting Dates. She acknowledged reading online the following: Chapter 106, Florida Statutes; the *Candidate and Campaign Treasurer Handbook*; and the *Candidates EFS User's Guide*. To review her Affidavit of Background Information, refer to Exhibit 22. To review To review relevant pages of the *Candidate and Campaign Treasurer Handbook*, refer to Exhibit 3.

Respectfully submitted on June 16, 2017.



Helen Hinson
Investigation Specialist

| Current address of Respondent | Current address of Complainant |
|--|---|
| Ms. Lisa Davidson 219 Sauers Avenue Johnstown, Pennsylvania 15906 | Division of Elections 500 South Bronough Street, Room 316 Tallahassee, Florida 32399-0250 |
| Name and Address of Filing Officer: | |
| Ms. Kristi Reid Bronson, Chief Bureau of Election Records 500 South Bronough Street, Room 316 Tallahassee, Florida 32399-0250 | |

Copy furnished to: Mr. David B. Flagg, Investigations Manager

FLORIDA ELECTIONS COMMISSION
REPORT OF INVESTIGATION
Lisa Davidson -- FEC 16-756

| LIST OF EXHIBITS | |
|-------------------------|--|
| Exhibits #s | Description of Exhibits |
| Exhibit 1 | Respondent's Form DS-DE 9 |
| Exhibit 2 | Acknowledgment letter from the DOE |
| Exhibit 3 | Relevant pages of the <i>June 2015 Candidate and Campaign Treasurer Handbook</i> |
| Exhibit 4 | Respondent's response to the DOE filed on August 26, 2016 |
| Exhibit 5 | Respondent's response to the DOE filed on September 19, 2016 |
| Exhibit 6 | 2016 M5 Report |
| Exhibit 7 | Queued Items for the 2016 M5 Report |
| Exhibit 8 | History Notes from the DOE |
| Exhibit 9 | Filing History |
| Exhibit 10 | Campaign Finance Activity |
| Exhibit 11 | Phone Log |
| Exhibit 12 | Calendar of Reporting Dates |
| Exhibit 13 | First Notice dated July 28, 2016 with Error Report |
| Exhibit 14 | <u>Second Notice</u> dated August 15, 2016 |
| Exhibit 15 | FINAL NOTICE dated September 20, 2016 |
| Exhibit 16 | USPS delivery confirmation for Final Notice |
| Exhibit 17 | Ms. Bronson's affidavit with relevant attachments |
| Exhibit 18 | Laurel S. Bennett's email dated June 7, 2017 with Raise The Money contributions |
| Exhibit 19 | Laurel S. Bennett's email dated June 7, 2017 with check receipt |
| Exhibit 20 | Respondent's email dated December 22, 2016 in response to the instant complaint |
| Exhibit 21 | Respondent's affidavit dated March 2, 2017 |
| Exhibit 22 | Respondent's Affidavit of Background Information dated April 22, 2017 |
| Exhibit 23 | Ms. Bronson's email dated June 14, 2017 re: status |

**APPOINTMENT OF CAMPAIGN TREASURER
AND DESIGNATION OF CAMPAIGN
DEPOSITORY FOR CANDIDATES**
(Section 106.021(1), F.S.)

(PLEASE PRINT OR TYPE)

RECEIVED
15 SEP 17 AM 11:38
DIVISION OF ELECTIONS
SECRETARY OF STATE

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

OFFICE USE ONLY

1. CHECK APPROPRIATE BOX(ES):

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

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

Lavrel S Bennett

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

147 Regent Court
Royal Palm Beach, FL 33411

4. Telephone

561 1379-5335

5. E-mail address

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

House of Representatives
District 56

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

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

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

Write-In No Party Affiliation Republican Party candidate.

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

10. Name of Treasurer or Deputy Treasurer

LISA DAWIDSON

11. Mailing Address

1000 Crow ST

12. Telephone

561 1744 2877

13. City

Jupiter

14. County

PBC

15. State

FL

16. Zip Code

33458

17. E-mail address

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

19. Name of Bank

Wells Fargo

20. Address

11707 Cheekabee Blvd

21. City

Royal Palm Beach

22. County

PBC

23. State

FL

24. Zip Code

33411

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

25. Date

11/15/2015

26. Signature of Candidate

X Lavrel S Bennett

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

I, Lisa Dawidson, do hereby accept the appointment

(Please Print or Type Name)

designated above as: Campaign Treasurer Deputy Treasurer.

9/15/15
Date

EXHIBIT 1

X

Lisa Dawidson
Signature of Campaign Treasurer or Deputy Treasurer



FLORIDA DEPARTMENT OF STATE

RICK SCOTT
Governor

KEN DETZNER
Secretary of State

September 18, 2015

Ms. Laurel S. Bennett
147 Raycourt Circle
Royal Palm Beach, Florida 33411

Dear Ms. Bennett:

This will acknowledge receipt of the Appointment of Campaign Treasurer and Designation of Campaign Depository for the office of State Representative, which was placed on file in our office on September 17, 2015. Your name has been placed on the 2016 active candidate list.

Campaign Treasurer's Reports

Your first campaign treasurer's report will be due on **October 13, 2015**. The report will cover the period of September 1-30, 2015 (M9). All candidates who 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 your user identification number. The enclosed sealed envelope contains your initial password. Once you have logged in using the initial password, you will be immediately prompted to change it to a confidential sign-on. You, your 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: 64923

EXHIBIT 2 (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.org

FLORIDA
DIVISION OF
ELECTION

Laurel S. Bennett
September 18, 2015
Page Two

Pin Numbers

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

Each candidate is required to provide the Division of Elections with confidential personal information that may be used to allow access in the event this 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 filed must be completed and filed through the EFS not later than midnight 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 of the first business day the EFS becomes operable. No fine will be levied during the period the EFS was inoperable.

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

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 candidate and campaign treasurer and such persons are subject to the provisions of Section 106.07(5), Florida Statutes.

EXHIBIT 2(2 of 3)

Laurel S. Bennett
September 18, 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: Chapters 104 and 106, Florida Statutes, *Candidate and Campaign Treasurer 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/js

Enclosures

pc: Lisa Davidson, Treasurer

EXHIBIT 2(3 of 3)

Candidate & Campaign Treasurer Handbook

June 2015

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



FLORIDA
★ DIVISION OF ★
ELECTIONS

EXHIBIT 3 (1 of 9)

Candidate & Campaign Treasurer Handbook
June 2015

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reported on campaign treasurer's reports to include the full name and address of each person who gave a cash contribution during the reporting period, together with the amount and date of such cash contribution.

(Sections 106.07(4) and 106.09, F.S., and Division of Elections Opinion 90-15.)

Debit and Credit Card Contributions

A candidate may accept contributions via a credit card or debit card. These contributions are categorized as a "check" for reporting purposes.

(Division of Elections Opinions 94-02 and 00-03)

Contribution Limits for Candidates

IMPORTANT: Except for political parties or affiliated party committees, no person or political committee may make contributions in excess of: (1) \$3,000 to a candidate for statewide office or for retention as a justice of the Supreme Court. Candidates for the offices of Governor and Lieutenant Governor on the same ticket are considered a single candidate for the purpose of this section; (2) \$1,000 to a candidate for retention as a judge of a district court of appeal; a candidate for legislative office; a candidate for multicounty office; a candidate for county-wide office or in any election conducted on less than a countywide basis; or a candidate for county court judge or circuit judge. The primary and general elections are separate elections. (See *Glossary for the definition of "person."*)

(Section 106.08(1)(a) F.S.)

These limits do not apply to contributions made by a state or county executive committee of a political party or affiliated party committee regulated by Chapter 103, F.S., or to amounts contributed by a candidate to his own campaign. The contribution limits do not apply to individuals seeking election to a political party executive committee because they are not "candidates."

A candidate may **not**:

- Accept contributions until Form DS-DE 9, Appointment of Campaign Treasurer and Designation of Campaign Depository for Candidates, is filed with the filing officer;
- Accept a contribution in excess of the above limits from any one person per election, provided the candidate is an opposed candidate and the contribution is received within the timeframe applicable to each election;
- Accept contributions from family members in excess of the above limits per election;
- Accept contributions from a county executive committee of a political party whose contributions in the aggregate exceed \$50,000, or from the national or state executive committees of a political party, including any subordinate committee of such political party or affiliated party committees, who contributions in the aggregate exceed \$50,000. Polling services, research services, cost for campaign staff, professional consulting services, and telephone calls are not contributions to be counted toward the contribution

limits, but must still be reported by the candidate. All other contributions are counted toward the contribution limits;

- A candidate for statewide (Governor, Cabinet and Supreme Court Justice) office may not accept contributions from a national, state, or county executive committee of a political party, including any subordinate committee of a national, state, or county committee of a political party, or affiliated party committee, which contributions in the aggregate exceed \$250,000; or
- Accept contributions after the date he or she withdraws his or her candidacy, is defeated, becomes unopposed or is elected.

(Sections 106.08 and 106.19, F.S.)

Foreign Contributions

Federal law prohibits contributions from foreign nationals to any federal, state, or local candidate, unless the foreign national possesses a green card. Further information can be accessed by contacting the Federal Election Commission at 1-800-424-9530 or on their website at <http://www.fec.gov>.

Violations

Any candidate, campaign manager, campaign treasurer, or deputy treasurer of any candidate, agent or person acting on behalf of any candidate, or other person who knowingly and willfully:

- Accepts a contribution in excess of the

limits prescribed by Section 106.08, F.S.;

- Fails to report any contribution required to be reported by Chapter 106, F.S.;
- Falsely reports or deliberately fails to include any information required by Chapter 106, F.S.; or
- Makes or authorizes any expenditure in violation of Section 106.11(4), F.S., or any other expenditure prohibited by Chapter 106, F.S.; is guilty of a misdemeanor of the first degree, punishable as provided in Section 775.082 or Section 775.083, F.S.
(Section 106.19, F.S.)

2016 Deadlines for Accepting Contributions

Any contribution received by a candidate with opposition in an election, or the campaign treasurer or deputy campaign treasurer, **on the day of that election or less than five days prior to the day of that election** must be returned to the contributor. It may not be used or expended by or on behalf of the candidate.

(See Appendix B for 2016 Deadlines)

Chapter 16: Filing Campaign Reports

Each campaign treasurer designated by a candidate shall file regular reports of all contributions received and all expenditures made by or on behalf of such candidate.

The candidate and his or her campaign treasurer shall certify as to the correctness of each report. Each person so certifying shall bear the responsibility for the accuracy and veracity of each report. Any campaign treasurer or candidate who willfully certifies the correctness of any report while knowing that such report is incorrect, false or incomplete commits a misdemeanor of the first degree.

(Section 106.07, F.S.)

Where to File

A campaign treasurer is required to file campaign treasurer's reports with the officer with whom the candidate registers.

Candidates filing reports with the Division are required to file by means of the Electronic Filing System. If the candidate's filing officer is other than the Division, contact the appropriate filing officer to find out the requirements.

The web address for filing online with the Division is: <https://efs.dos.state.fl.us/>
(Section 106.07(2), F.S.)

When to File

Reports must be filed on the 10th day following the end of each calendar month from the time the candidate registers, except that if the 10th day occurs on a Saturday, Sunday or legal holiday, the report shall be filed on the next business day that is not a Saturday, Sunday or legal holiday.

A statewide candidate must file reports:

1. On the 60th day immediately preceding the primary election, and each week thereafter, with the last weekly report being filed on the 4th day immediately preceding the general election.
2. On the 10th day immediately preceding the general election, and each day thereafter, with the last daily report being filed the 5th day immediately preceding the general election.

All other candidates must file reports on the 60th day immediately preceding the primary election and bi-weekly on each Friday thereafter through and including the 4th day immediately preceding the general election, with additional reports due on the 25th and 11th days before the primary election and the general election.

For candidates that file with the Division, see the "Reporting Dates Calendar" at:

<http://dos.myflorida.com/elections/forms-publications/publications/>

An individual seeking a publicly elected position on a political party executive committee who receives a contribution or makes an expenditure must file a single report of all contributions and expenditures on the 4th day immediately preceding the primary election. (*See Chapter 18, Reporting for Individuals Seeking a Publicly Elected Position on a Party Executive Committee.*)

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.

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

Penalty for Late Filing

Any candidate failing to file a report on the designated due date shall be subject to a fine of \$50 per day for the first three days late and, thereafter, \$500 per day for each late day, not to exceed 25 percent of the total receipts or expenditures, whichever is

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

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

Notice of No Activity

In any reporting period during which a candidate has not received funds or made any expenditures, the filing of the required report for that period is waived. **However, the candidate must notify the filing officer in writing on or before the prescribed reporting date that no report is being filed on that date.** (A notice of no activity filed with the Division must be filed electronically using the EFS.) The next report filed must specify that the report covers the entire period between the last submitted report and the report being filed.

(Section 106.07, F.S.)

Incomplete Reports

If a campaign treasurer files a report that is deemed incomplete, it shall be accepted on a conditional basis. The campaign treasurer will be notified by the filing officer as to why the report is incomplete. The campaign



RECEIVED

16 AUG 26 AM 9:56

DIVISION OF ELECTIONS
SECRETARY OF STATE

FLORIDA DEPARTMENT OF STATE

Ken Detzner
Secretary of State

DIVISION OF ELECTIONS

Second Notice

August 15, 2016

Lisa Davidson, Treasurer for
Candidate Laurel S. Bennett
2806 Clearwater Terr SE
Conyers, GA 30013

Re: CAN 64923

Dear Ms. Davidson:

On July 28, 2016, you were advised that one or more of your campaign treasurer's reports were incomplete and that you had 7 days to provide the requested information.

Our records indicate that changes to the report were made, however, the reports are still incomplete. Enclosed is a second error report. Please provide the requested information within 7 days of the date of this letter. Thank you for your cooperation.

Sincerely,

Kristi Reid Bronson, Chief
Bureau of Election Records

Attachment

cc: Laurel S. Bennett, Candidate

See attached
EXHIBIT 4 (1 of 2)

Error Report

Candidate: Laurel S. Bennett

Office: STR

Report: 2016 M5 (9) Covering Period: 5/1/16 - 5/31/16

Account: 64923

| idations | | Contributor | | | Contribution | | | | | | |
|--|----------|-----------------|----------------------------|----------------------------|--------------|--------------------|------|----------|--------|---------|-------|
| Seq | Date | Name | Address | City/State/Zip | Type | Occupation | Type | Amount | InKind | Descrip | Amend |
| 7 | 05/28/16 | MATTHEWS JAMES | 1350 SW 26TH AVE | BOYNTON BEACH, FL 33426 | I | FACILITIES | CAS | \$100.00 | | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | | | |
| 4 | 05/08/16 | DAVIDSON LISA | 2806 CLEARWATER TERRACE SE | CONYERS, GA 30013 | I | RETIRED | CAS | \$100.00 | | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | | | |
| 3 | 05/12/16 | BALABAN BORIS | 147 ROYCOURT CIRCLE | ROYAL PALM BEACH, FL 33411 | I | TELECOMMUNICATIONS | CAS | \$500.00 | | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | | | |
| 1 | 05/13/16 | MATTEOLIA MATTY | 475 GREENWAY BLVD | ROYAL PALM BEACH, FL 33411 | I | MAYOR | CAS | \$100.00 | | | |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | | | |
| 8 | 05/23/16 | ELLIOTT NANCY | | OKLAHOMA CITY, OK | I | AIRCRAFT MECHANIC | CAS | \$100.00 | | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | | | |
| *No Address Was Provided | | | | | | | | | | | |

Contributions

Transfers

Contributions 8/15/16

* Cash contributions changed to check, written explanation required.

You told me I couldn't put them in as cash even though they were, so I put them in as checks. What was I supposed to do!

EXHIBIT 4(282)

RECEIVED
16 AUG 26 AM 9:57
DIVISION OF ELECTIONS
SECRETARY OF STATE



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

Second Notice

August 15, 2016

Lisa Davidson, Treasurer for
Candidate Laurel S. Bennett
2806 Clearwater Terr SE
Conyers, GA 30013

Re: CAN 64923

Dear Ms. Davidson:

On July 28, 2016, you were advised that one or more of your campaign treasurer 's reports were incomplete and that you had 7 days to provide the requested information.

Our records indicate that changes to the report were made, however, the reports are still incomplete. Enclosed is a second error report. Please provide the requested information within 7 days of the date of this letter. Thank you for your cooperation.

Sincerely,

Kristi Reid Bronson, Chief
Bureau of Election Records

Attachment

cc: Laurel S. Bennett, Candidate

EXHIBIT 5 (1 of 2)

Error Report

Candidate: Laurel S. Bennett

Office: STR

Report: 2016 M5 (9) Covering Period: 5/1/16 - 5/31/16

Account: 64923

Contributions

| Contributor | | | | Contribution | | | | | | |
|--|----------|----------------|----------------------------|----------------------------|------|--------------------|------|----------|----------------|-------|
| Seq | Date | Name | Address | City/State/Zip | Type | Occupation | Type | Amount | InKind Descrip | Amend |
| 7 | 05/28/16 | MATTHEWS JAMES | 1350 SW 26TH AVE | BOYNTON BEACH, FL 33426 | 1 | FACILITIES | CAS | \$100.00 | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | | |
| 4 | 05/08/16 | DAVIDSON LISA | 2806 CLEARWATER TERRACE SE | CONYERS GA 30013 | 1 | RETIRED | CAS | \$100.00 | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | | |
| 3 | 05/12/16 | BALABAN BORIS | 147 ROYCOURT CIRCLE | ROYAL PALM BEACH, FL 33411 | 3-1 | TELECOMMUNICATIONS | CAS | \$500.00 | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | | |
| 1 | 05/13/16 | MATTEOLA MATTY | 475 GREENWAY BLVD | ROYAL PALM BEACH, FL 33411 | 3-1 | MAYOR | CAS | \$100.00 | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | | |
| 8 | 05/23/16 | ELLIOTT NANCY | | OKLAHOMA CITY, OK | 1 | AIRCRAFT MECHANIC | CAS | \$100.00 | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | | |
| *No Address Was Provided | | | | | | | | | | |

Transfers

Transfers

Distributions 8/15/16

* Cash contributions changed to check, written explanation required.

EXHIBIT 5 (2 of 2)

I sent a written explanation to you last month. I put these in as cash that went to a campaign fund online. You told me I couldn't put the actual \$100.00 amounts in as cash, so I changed them to checks. What else do you want me to do.

RECEIVED
 DEPARTMENT OF STATE
 DIVISION OF ELECTIONS
 2016 SEP 19 AM 10:23

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

(1) Laurel S. Bennett (2) 64923
 Candidate, Committee or Party Name I.D. Number

(3) 147 Roycourt Circle Royal Palm Beach FL 33411
 Address (number and street) City State Zip Code

Check box if address has changed since last report

(4) Check appropriate box(es):

Candidate (office sought):
 Political Committee Check If PC has DISBANDED
 Committee of Continuous Existence Check If CCE has DISBANDED
 Party Executive Committee

(5) REPORT IDENTIFIERS

Cover Period: From 05/01/2016 To 05/31/2016 Report Type: M5

Original Amendment Special Election Report

(6) CONTRIBUTIONS THIS REPORT

| | |
|-----------------------|------------|
| Cash & Checks | \$1,245.00 |
| Loans | \$0.00 |
| <i>Total Monetary</i> | \$1,245.00 |
| In-Kind | \$0.00 |

(7) EXPENDITURES THIS REPORT

| | |
|-----------------------------|----------|
| Monetary Expenditures | \$130.16 |
| Transfers to Office Account | \$0.00 |
| <i>Total Monetary</i> | \$130.16 |

(8) Other Distributions

Certification

It is a first degree misdemeanor for any person to falsify a public record (ss.839.13, F.S.)

I certify that I have examined this report and it is true, correct and complete

Name of Treasurer Deputy Treasurer

X
Signature

I certify that I have examined this report and it is true, correct and complete

Name of Candidate Chairman (PC/PTY Only)

X
Signature

Name: Laurel S. Bennett

Report: 2016 M5

Period: 05/01/2016 to 05/31/2016

**** Records in Filed Report ****

| Seq # | Full Name (Last, Suffix, First, Middle) | Contributor | Occupation | Amount |
|------------|---|-------------|---------------------|----------|
| Date | Street Address & City, State, Zip | Type | In-Kind Description | Amend |
| * 1 | MATTEOLIA, MATTY 475 GREENWAY BLVD ROYAL PALM BEACH, FL 33411 | I CAS | MAYOR | \$100.00 |
| 05/13/2016 | | | | |
| 2 | PRUDENTE, PAULA 1836 EMILIO LANE WEST PALM BEACH, FL 33401 | I CAS | TEACHER | \$20.00 |
| 05/19/2016 | | | | ADD |
| * 3 | BALABAN, BORIS 147 ROYCOURT CIRCLE ROYAL PALM BEACH, FL 33411 | I CAS | TELECOMMUNICATIONS | \$500.00 |
| 05/12/2016 | | | | ADD |
| * 4 | DAVIDSON, LISA 2806 CLEARWATER TERRACE SE CONYERS, GA 30013 | I CAS | RETIRED | \$100.00 |
| 05/08/2016 | | | | ADD |
| 5 | PETRITIS, LAURIE 7530 LAUDEN DR LAKE WORTH, FL 33467 | I CAS | RETIRED HEALTHCARE | \$50.00 |
| 05/27/2016 | | | | ADD |
| 6 | BALABAN, BORIS 147 ROYCOURT CIRCLE ROYAL PALM BEACH, FL 33411 | I CAS | TELECOMMUNICATIONS | \$25.00 |
| 05/20/2016 | | | | ADD |
| * 7 | MATTHEWS, JAMES 1350 SW 26TH AVE BOYNTON BEACH, FL 33426 | I CAS | FACILITIES | \$100.00 |
| 05/28/2016 | | | | ADD |
| * 8 | ELLIOTT, NANCY OKLAHOMA CITY, OK | I CAS | AIRCRAFT MECHANIC | \$100.00 |
| 05/23/2016 | | | | ADD |
| 9 | TATE, STANLEY 1175 NE 125TH ST N. MIAMI, FL 33161 | I CHE | PHILANTHROPY | \$250.00 |
| 05/30/2016 | | | | ADD |

Name: Laurel S. BennettReport: 2016 M5Period: 05/01/2016 to 05/31/2016**** Records in Filed Report ****

| Seq # Date | Full Name (Last, Suffix, First, Middle Street Address & City, State, Zip | Type | Purpose | Amount Amend |
|-----------------|--|------|----------------------------|-----------------|
| 1 05/28/2016 | BENNETT LAUREL 147 ROYCOURT CIRCLE ROYAL PALM BEACH, FL 33411 | MON | CAMPAIGN FUND RAISER | \$130.16 |
| 2 05/28/2016 | BENNETT LAUREL 147 ROYCOURT CIRCLE ROYAL PALM BEACH, FL 33411 | PCS | T-SHIRTS MADE FOR CAMPAIGN | \$28.62 |

Filed Campaign Treasurer's Report

Laurel S. Bennett
64923 - STR 086

Elect ID: **20161108-GEN**
Report: **2016 M5 (9)**

From: **5/1/2016** Amd: **Y** Wvr: **N**
To: **5/31/2016** Cmplt: **INC**

Filed: **FIL** 6/17/2016 2:48:41 P
Reviewed: **UPD** 4/4/2017 12:40:46 P

Original Report

Submitted: 6/17/2016 2:48:41 P

CONTRIBUTIONS

| <i>Seq Date</i> | <i>Name</i> | <i>Address</i> | <i>Contributor Type</i> | <i>Occupation Inkind Description</i> | <i>Errors Amd</i> | <i>Amount</i> |
|-----------------|-------------|------------------------|-------------------------|--------------------------------------|-------------------|---------------|
| 1 | MATTEOLIA | 475 GREENWAY BLVD | I | MAYOR | 1 | \$100.00 |
| 5/13/2016 | MATTY | ROYAL PALM BE FL 33411 | CAS | | | |

EXPENDITURES

| <i>Seq Date</i> | <i>Name</i> | <i>Address</i> | <i>Type</i> | <i>Office Purpose</i> | <i>Errors Amd</i> | <i>Amount</i> |
|-----------------|-------------|------------------------|-------------|----------------------------|-------------------|---------------|
| 1 | BENNETT | 147 ROYCOURT CIRCLE | MON | | 0 | \$130.16 |
| 5/28/2016 | LAUREL | ROYAL PALM BE FL 33411 | | CAMPAIGN FUND RAISER | | |
| 2 | BENNETT | 147 ROYCOURT CIRCLE | PCS | | 0 | \$28.62 |
| 5/28/2016 | LAUREL | ROYAL PALM BE FL 33411 | | T-SHIRTS MADE FOR CAMPAIGN | | |

EXHIBIT 6 (4 of 11)

Filed Campaign Treasurer's Report

Laurel S. Bennett
64923 - STR 086

Elect ID: **20161108-GEN**

From: **5/1/2016**

Amd: **Y**

Wvr: **N**

Filed: **FIL** 6/17/2016 2:48:41 P

Report: **2016 M5 (9)**

To: **5/31/2016**

Cmplt: **INC**

Reviewed: **UPD** 4/4/2017 12:40:46 P

Amended Report

Submitted: 6/21/2016 12:24:43 P

CONTRIBUTIONS

| Seq Date | Name | Address | Contributor Type | Occupation Inkind Description | Errors Amd | Amount |
|-----------|----------|----------------------------|------------------|-------------------------------|------------|----------|
| 2 | PRUDENTE | 1836 EMILIO LANE | I | TEACHER | 0 | \$20.00 |
| 5/19/2016 | PAULA | WEST PALM BEA FL 33401 | CAS | | ADD | |
| 3 | BALABAN | 147 ROYCOURT CIRCLE | I | TELECOMMUNICATIONS | 1 | \$500.00 |
| 5/12/2016 | BORIS | ROYAL PALM BE FL 33411 | CAS | | ADD | |
| 4 | DAVIDSON | 2806 CLEARWATER TERRACE SE | I | RETIRED | 1 | \$100.00 |
| 5/8/2016 | LISA | CONYERS GA 30013 | CAS | | ADD | |
| 5 | PETRITIS | 7530 LAUDEN DR | I | RETIRED HEALTHCARE | 0 | \$50.00 |
| 5/27/2016 | LAURIE | LAKE WORTH FL 33467 | CAS | | ADD | |
| 6 | BALABAN | 147 ROYCOURT CIRCLE | I | TELECOMMUNICATIONS | 0 | \$25.00 |
| 5/20/2016 | BORIS | ROYAL PALM BE FL 33411 | CAS | | ADD | |
| 7 | MATTHEWS | 1350 SW 26TH AVE | I | FACILITIES | 1 | \$100.00 |
| 5/28/2016 | JAMES | BOYNTON BEAC FL 33426 | CAS | | ADD | |
| 8 | ELLIOTT | | I | AIRCRAFT MECHANIC | 2 | \$100.00 |
| 5/23/2016 | NANCY | OKLAHOMA CIT OK | CAS | | ADD | |
| 9 | TATE | 1175 NE 125TH ST | I | PHILANTHROPY | 0 | \$250.00 |
| 5/30/2016 | STANLEY | N. MIAMI FL 33161 | CHE | | ADD | |

EXHIBIT 6(5 of 11)

Filed Campaign Treasurer's Report

Laurel S. Bennett

Elect ID: 20161108-GEN

From: 5/1/2016

Amd: Y

Wvr: N

Filed: **FIL** 6/17/2016 2:48:41 P

64923 - STR 086

Report: 2016 M5 (9)

To: 5/31/2016

Cmplt: INC

Reviewed: **UPD** 4/4/2017 12:40:46 P

Amended Report

Submitted: 8/3/2016 3:17:25 PM

CONTRIBUTIONS

| Seq Date | Name | Address | Contributor Type | Occupation Inkind Description | Errors Amd | Amount |
|-------------|-----------|----------------------------|---------------------|----------------------------------|---------------|----------|
| 1 | MATTEOLIA | 475 GREENWAY BLVD | I | MAYOR | 0 | \$100.00 |
| 5/13/2016 | MATTY | ROYAL PALM BE FL 33411 | MO | | UPD | |
| 3 | BALABAN | 147 ROYCOURT CIRCLE | I | TELECOMMUNICATIONS | 0 | \$500.00 |
| 5/12/2016 | BORIS | ROYAL PALM BE FL 33411 | CHE | | UPD | |
| 4 | DAVIDSON | 2806 CLEARWATER TERRACE SE | I | RETIRED | 0 | \$100.00 |
| 5/8/2016 | LISA | CONYERS GA 30013 | CHE | | UPD | |
| 6 | BALABAN | 147 ROYCOURT CIRCLE | I | TELECOMMUNICATIONS | 0 | \$25.00 |
| 5/20/2016 | BORIS | ROYAL PALM BE FL 33411 | CAS | | UPD | |
| 7 | MATTHEWS | 1350 SW 26TH AVE | I | FACILITIES | 0 | \$100.00 |
| 5/28/2016 | JAMES | BOYNTON BEAC FL 33426 | CHE | | UPD | |
| 8 | ELLIOTT | 143 HOLLY RD | I | AIRCRAFT MECHANIC | 0 | \$100.00 |
| 5/23/2016 | NANCY | OKLAHOMA CIT OK 73507 | CHE | | UPD | |

EXHIBIT 6 (6 of 11)

Filed Campaign Treasurer's Report

Laurel S. Bennett
64923 - STR 086

Elect ID: **20161108-GEN**

From: **5/1/2016**

Amd: **Y**

Wvr: **N**

Filed: **FIL** 6/17/2016 2:48:41 P

Report: **2016 M5 (9)**

To: **5/31/2016**

Cmplt: **INC**

Reviewed: **UPD** 4/4/2017 12:40:46 P

Amended Report

Submitted: 8/22/2016 6:13:39 P

CONTRIBUTIONS

| <i>Seq Date</i> | <i>Name</i> | <i>Address</i> | <i>Contributor Type</i> | <i>Occupation Inkind Description</i> | <i>Errors Amd</i> | <i>Amount</i> |
|-----------------|-------------|------------------------|-------------------------|--------------------------------------|-------------------|---------------|
| 3 | BALABAN | 147 ROYCOURT CIRCLE | I | TELECOMMUNICATIONS | 0 | \$500.00 |
| 5/12/2016 | BORIS | ROYAL PALM BE FL 33411 | CHE | | UPD | |
| 7 | MATTHEWS | 1350 SW 26TH AVE | I | FACILITIES | 0 | \$100.00 |
| 5/28/2016 | JAMES | BOYNTON BEAC FL 33426 | CHE | | UPD | |
| 8 | ELLIOTT | 143 HOLLY RD | I | AIRCRAFT MECHANIC | 0 | \$100.00 |
| 5/23/2016 | NANCY | OKLAHOMA CIT OK 73507 | CHE | | UPD | |

EXIST 67 of 11

Filed Campaign Treasurer's Report

Laurel S. Bennett
64923 - STR 086

Elect ID: **20161108-GEN**
 Report: **2016 M5 (9)**

From: **5/1/2016**
 To: **5/31/2016**

Amd: **Y** Wvr: **N**
 Cmplt: **INC**

Filed: **FIL** 6/17/2016 2:48:41 P
 Reviewed: **UPD** 4/14/2017 12:40:46 P

Amended Report

Submitted: 9/23/2016 12:22:30 P

CONTRIBUTIONS

| <i>Seq Date</i> | <i>Name</i> | <i>Address</i> | <i>Contributor Type</i> | <i>Occupation Inkind Description</i> | <i>Errors Amd</i> | <i>Amount</i> |
|---------------------|-------------|----------------------------|-----------------------------|--|-----------------------|---------------|
| 1 | MATTEOLIA | 475 GREENWAY BLVD | I | MAYOR | 0 | \$50.00 |
| 5/13/2016 | MATTY | ROYAL PALM BE FL 33411 | CAS | | UPD | |
| 3 | BALABAN | 147 ROYCOURT CIRCLE | I | TELECOMMUNICATIONS | 0 | \$50.00 |
| 5/12/2016 | BORIS | ROYAL PALM BE FL 33411 | CAS | | UPD | |
| 4 | DAVIDSON | 2806 CLEARWATER TERRACE SE | I | RETIRED | 0 | \$50.00 |
| 5/8/2016 | LISA | CONYERS GA 30013 | CAS | | UPD | |
| 5 | PETRITIS | 7530 LAUDEN DR | I | RETIRED HEALTHCARE | 0 | \$50.00 |
| 5/27/2016 | Laurie | LAKE WORTH FL 33467 | CAS | | UPD | |
| 7 | MATTHEWS | 1350 SW 26TH AVE | I | FACILITIES | 0 | \$50.00 |
| 5/28/2016 | JAMES | BOYNTON BEAC FL 33426 | CAS | | UPD | |
| 8 | ELLIOTT | 7007 SUMMIT OAK DR | I | AIRCRAFT MECHANIC | 0 | \$50.00 |
| 5/23/2016 | NANCY | EDMOND OK 73034 | CAS | | UPD | |
| 10 | MATTHEWS | 1350 SW 26TH AVE | I | FACILITIES | 0 | \$50.00 |
| 5/28/2016 | JAMES | BOYNTON BEAC FL 33426 | CAS | | ADD | |
| 11 | ELLIOTT | 7007 SUMMIT OAK DR | I | | 0 | \$50.00 |
| 5/23/2016 | NANCY | EDMOND OK 73034 | CAS | | ADD | |
| 12 | DAVIDSON | 2806 CLEARWATER TERRACE | I | | 0 | \$50.00 |
| 5/8/2016 | LISA | CONYERS GA 30013 | CAS | | ADD | |
| 13 | MATTEOLA | 475 GREENWAY BLVD | I | | 0 | \$50.00 |
| 5/13/2016 | MATTY | ROYAL PALM BE FL 33411 | CAS | | ADD | |
| 14 | BALABAN | 147 ROYCOURT CIRCLE | I | TELECOMMUNICATIONS | 0 | (\$400.00) |
| 5/12/2016 | BORIS | ROYAL PALM BE FL 33411 | REF | | ADD | |

EXHIBIT 6 (8 of 11)

Filed Campaign Treasurer's Report

Laurel S. Bennett
64923 - STR 086

Elect ID: 20161108-GEN

From: 5/1/2016

Amd: Y

Wvr: N

Filed: FIL 6/17/2016 2:48:41 P

Report: 2016 M5 (9)

To: 5/31/2016

Cmplt: INC

Reviewed: UPD 4/4/2017 12:40:46 P

Amended Report

Submitted: 9/23/2016 12:28:03 P

Amended Report

Submitted: 10/18/2016 9:15:45 A

CONTRIBUTIONS

| Seq Date | Name | Address | Contributor Type | Occupation Inkind Description | Errors Amd | Amount |
|-----------|----------|-------------------------|------------------|-------------------------------|------------|----------|
| 7 | MATTHEWS | 1350 SW 26TH AVE | I | FACILITIES | 1 | \$100.00 |
| 5/28/2016 | JAMES | BOYNTON BEAC FL 33426 | CAS | | UPD | |
| 11 | ELLIOTT | 7007 SUMMIT OAK DR | I | | 1 | \$100.00 |
| 5/23/2016 | NANCY | EDMOND OK 73034 | CAS | | UPD | |
| 12 | DAVIDSON | 2806 CLEARWATER TERRACE | I | | 1 | \$100.00 |
| 5/8/2016 | LISA | CONYERS GA 30013 | CAS | | UPD | |
| 13 | MATTEOLA | 475 GREENWAY BLVD | I | | 1 | \$100.00 |
| 5/13/2016 | MATTY | ROYAL PALM BE FL 33411 | CAS | | UPD | |
| 14 | BALABAN | 147 ROYCOURT CIRCLE | I | TELECOMMUNICATIONS | 1 | \$500.00 |
| 5/12/2016 | BORIS | ROYAL PALM BE FL 33411 | REF | | UPD | |

EXHIBIT 6 (9 of 11)

Filed Campaign Treasurer's Report

Laurel S. Bennett
64923 - STR 086

Elect ID: **20161108-GEN** From: **5/1/2016** Amd: **Y** Wvr: **N** Filed: **FIL** 6/17/2016 2:48:41 P
Report: **2016 M5 (9)** To: **5/31/2016** Cmplt: **INC** Reviewed: **UPD** 4/4/2017 12:40:46 P

Amended Report

Submitted: 4/6/2017 9:45:34 PM

EXPENDITURES

| <i>Seq Date</i> | <i>Name</i> | <i>Address</i> | <i>Type</i> | <i>Office Purpose</i> | <i>Errors Amd</i> | <i>Amount</i> |
|---------------------|-------------|------------------------|-------------|----------------------------|-----------------------|---------------|
| 2 | MICHAELS | 340 STATE RD 7 | MON | | 0 | \$28.62 |
| 5/28/2016 | | ROYAL PALM BE FL 33414 | | T-SHIRTS MADE FOR CAMPAIGN | UPD | |

EXHIBIT 6 (10 of 11)

4/19/2017

Filed Campaign Treasurer's Report

Page 8

Laurel S. Bennett
64923 - STR 086

Elect ID: **20161108-GEN**
Report: **2016 M5 (9)**

From: **5/1/2016**
To: **5/31/2016**

Amd: **Y** Wvr: **N**
Cmplt: **INC**

Filed: **FIL** 6/17/2016 2:48:41 P
Reviewed: **UPD** 4/4/2017 12:40:46 P

EXHIBIT 6 (11 of 11)

Queued Items for 2016-M5

Account: 64923

STR 086 Laurel S. Bennett

Rpt Seq: 9

| <i>ProcessDescription</i> | <i>Status</i> | <i>Submitter</i> | <i>Created</i> | <i>LastUpdate</i> |
|---------------------------|---------------------|------------------|-----------------------|-----------------------|
| Create Pending Report | Processing Complete | 64923 | 6/17/2016 2:10:48 PM | 6/17/2016 2:10:48 PM |
| File Pending Report | Processing Complete | 64923 | 6/17/2016 2:48:41 PM | 6/17/2016 2:48:41 PM |
| Amend Filed Report | Processing Complete | 64923 | 6/21/2016 11:54:06 AM | 6/21/2016 11:54:07 AM |
| File Pending Report | Processing Complete | 64923 | 6/21/2016 12:24:43 PM | 6/21/2016 12:24:43 PM |
| Review Filed Report | Processing Complete | 64923 | 7/5/2016 2:07:45 PM | 7/5/2016 2:07:45 PM |
| Review Filed Report | Processing Complete | ejrowlette | 7/5/2016 3:36:25 PM | 7/5/2016 3:36:25 PM |
| Review Filed Report | Processing Complete | krbranson | 7/26/2016 3:58:57 PM | 7/26/2016 3:58:57 PM |
| Review Filed Report | Processing Complete | 64923 | 8/3/2016 2:19:29 PM | 8/3/2016 2:19:29 PM |
| Review Filed Report | Processing Complete | 64923 | 8/3/2016 2:48:04 PM | 8/3/2016 2:48:05 PM |
| Amend Filed Report | Processing Complete | 64923 | 8/3/2016 2:49:33 PM | 8/3/2016 2:49:33 PM |
| Review Pending Report | Processing Complete | 64923 | 8/3/2016 2:50:09 PM | 8/3/2016 2:50:09 PM |
| Review Pending Report | Processing Complete | 64923 | 8/3/2016 2:50:26 PM | 8/3/2016 2:50:26 PM |
| Review Pending Report | Processing Complete | 64923 | 8/3/2016 3:00:53 PM | 8/3/2016 3:00:53 PM |
| Review Pending Report | Processing Complete | 64923 | 8/3/2016 3:02:27 PM | 8/3/2016 3:02:27 PM |
| Review Pending Report | Processing Complete | 64923 | 8/3/2016 3:03:20 PM | 8/3/2016 3:03:20 PM |
| Review Pending Report | Processing Complete | 64923 | 8/3/2016 3:09:17 PM | 8/3/2016 3:09:17 PM |
| Review Pending Report | Processing Complete | 64923 | 8/3/2016 3:14:48 PM | 8/3/2016 3:14:48 PM |
| File Pending Report | Processing Complete | 64923 | 8/3/2016 3:17:25 PM | 8/3/2016 3:17:25 PM |
| Review Filed Report | Processing Complete | zjsantos | 8/12/2016 11:37:55 AM | 8/12/2016 11:37:55 AM |
| Review Filed Report | Processing Complete | 64923 | 8/22/2016 6:05:52 PM | 8/22/2016 6:05:52 PM |
| Amend Filed Report | Processing Complete | 64923 | 8/22/2016 6:06:04 PM | 8/22/2016 6:06:04 PM |
| File Pending Report | Processing Complete | 64923 | 8/22/2016 6:13:39 PM | 8/22/2016 6:14:27 PM |
| Review Filed Report | Processing Complete | zjsantos | 9/19/2016 11:56:16 AM | 9/19/2016 11:56:16 AM |
| Amend Filed Report | Processing Complete | 64923 | 9/23/2016 11:56:40 AM | 9/23/2016 11:56:40 AM |
| Review Pending Report | Processing Complete | 64923 | 9/23/2016 12:19:19 PM | 9/23/2016 12:19:19 PM |
| Review Pending Report | Processing Complete | 64923 | 9/23/2016 12:21:10 PM | 9/23/2016 12:21:10 PM |
| File Pending Report | Processing Complete | 64923 | 9/23/2016 12:22:30 PM | 9/23/2016 12:22:31 PM |
| Amend Filed Report | Processing Complete | 64923 | 9/23/2016 12:25:23 PM | 9/23/2016 12:25:23 PM |
| Review Filed Report | Processing Complete | 64923 | 9/23/2016 12:26:43 PM | 9/23/2016 12:26:43 PM |
| File Pending Report | Processing Complete | 64923 | 9/23/2016 12:28:03 PM | 9/23/2016 12:28:03 PM |
| Amend Filed Report | Processing Complete | 64923 | 10/18/2016 9:08:54 AM | 10/18/2016 9:08:54 AM |
| Review Pending Report | Processing Complete | 64923 | 10/18/2016 9:14:18 AM | 10/18/2016 9:14:19 AM |
| File Pending Report | Processing Complete | 64923 | 10/18/2016 9:15:45 AM | 10/18/2016 9:15:46 AM |
| Review Filed Report | Processing Complete | ejrowlette | 12/6/2016 10:03:27 AM | 12/6/2016 10:03:28 AM |
| Amend Filed Report | Processing Complete | 64923 | 4/4/2017 12:40:46 PM | 4/4/2017 12:40:46 PM |

EXHIBIT 7(1 of 2)

Queued Items for 2016-M5

Account: 64923

STR 086 Laurel S. Bennett

Rpt Seq: 9

Review Filed Report

Processing Complete

64923

4/4/2017 2:22:22 PM

4/4/2017 2:22:22 PM

File Pending Report

Processing Complete

64923

4/6/2017 9:45:34 PM

4/6/2017 9:45:35 PM

HISTORY NOTES
Laurel S. Bennett - 64923

| Unique ID | Date Recorded | Last Edited Date | Originally Recorded By |
|---|-----------------------|------------------|------------------------|
| 53494 | 4/17/2017 2:59:00 PM | | Ejrowlette |
| <p>Re: candidate response to email audit of TR Thank you Erika, I have company through tomorrow but will jump on it asap! Thank you for your help in this matte! Sincerely,</p> <p>Laurel 561.379.5335 www.PHRsolutions.org</p> | | | |
| 53491 | 4/17/2017 2:17:00 PM | | Ejrowlette |
| <p>Re: Email to candidate concerning audit of TR Laurel.Bennett@PHRSolutions.org Attention Ms. Laurel S. Bennett, Candidate (64923). This email is in reference to an audit mailed out on February 9, March 1, and March 24, 2017. I have included a copy of the audit attached to this email. Once the balance has been reconciled to \$0.00, the Division of Elections requires a signed written explanation as to what reporting errors caused a balance and the reports amended to correct the errors. Please update the necessary reports so we may close out this audit.</p> <p>If you have any questions, please contact me at 850-245-6280.</p> <p>Erika J. Rowlette Regulatory Specialist III Bureau of Election Records Florida Department of State R.A. Gray Building</p> | | | |
| 53464 | 4/14/2017 10:48:00 AM | | EJRowlette |
| <p>Email sent to treasurer and candidate concerning TR audit, 3/24/17</p> <p>staff@Laurel-Bennett.com Laurel@Laurel-Bennett.com</p> <p>Attention Ms. Lisa Davidson, Treasurer and Laurel S. Bennett, Candidate (64923),</p> <p>This email is in reference to an audit mailed out on February 9, March 1, and March 24, 2017. The Division of Elections has received 2 letters from Ms. Lisa Davidson informing us she no longer lives in the state of Florida. However, the issues on this audit need to be addressed and resolved. I have included a copy of the audit attached to this email. Please update this report so we may close out this audit. . If action is not taken within the next couple of days, we will refer this issue to the Florida Elections Commission.</p> <p>If you have any questions, please contact me at 850-245-6280.</p> <p>Erika J. Rowlette Regulatory Specialist III Bureau of Election Records Florida Department of State</p> | | | |
| 53124 | 3/31/2017 11:24:00 AM | | mchellman |
| <p>Re: 3/24/17 audit, T called. She said she no longer lives in Florida and doesn't have the records, but has contacted the Can re: need to complete all amendments related to the concerns detailed in our audit letter. Topics covered in our discussion: Balance Deficit - amend all reports completely and accurately, and send in a letter explaining how and why it was necessary. Explained the deficit now per how campaign reported it. Report all PCW - she confirmed all of this was petty cash as reported, not Mon or Reimb. Advised most a petty case expenditure could be is less than \$100. She would need to report all PCW, and all individual instance of PCS, each individual receipt. Explained deficit in amount withdrawn compared to amount spent.</p> <p>Asked her call if she needed further assistance with the amendments. She said she was working on the problem.</p> | | | |

HISTORY NOTES
Laurel S. Bennett - 64923

| Unique ID | Date Recorded | Last Edited Date | Originally Recorded By |
|--|-----------------------|-------------------------|-------------------------------|
| 46471 | 2/10/2016 5:48:00 PM | | DSBrown |
| RE: 2016 M1 | | | |
| Assisted treasurer with filing the 2016 M1 report. She did not know how to enter the contributions or file. She did complete the report successfully. | | | |
| 46141 | 1/21/2016 3:02:00 PM | | jhayala |
| re: Phone call regarding audit | | | |
| 1-21-16- Assisted treasurer in amending the 2015 M12 report. Error has been corrected. Audit can be closed. Jha | | | |
| 45781 | 12/18/2015 8:16:00 AM | | zjsantos |
| RE: Returned Mail | | | |
| I spoke with Ms. Davidson and informed her that we had returned mail for her, she has since updated her address and I have forwarded the mail to the recently updated address. | | | |



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Florida Department of State - Division of Elections

Florida Election System Reports

Candidate/Committee Lookup

Candidate Name: Laurel S. Bennett

Name:

Account: 64923

Election:

Acct:

Type:

| Date Due | Type | Date Filed | Status | Days Late | Fine Assessed | Appealed | Amount Fined | Amount Paid |
|------------|------|------------|--------|-----------|---------------|----------|--------------|-------------|
| 2/6/2017 | TR | 2/4/2017 | | | | | | |
| 11/4/2016 | G7 | 11/4/2016 | | | | | | |
| 10/28/2016 | G6 | 10/28/2016 | | | | | | |
| 10/21/2016 | G5 | 10/21/2016 | | | | | | |
| 10/14/2016 | G4 | 10/14/2016 | | | | | | |
| 10/7/2016 | G3 | 10/7/2016 | | | | | | |
| 9/23/2016 | G2 | 9/23/2016 | | | | | | |
| 9/9/2016 | G1 | 9/8/2016 | | | | | | |
| 8/26/2016 | P7 | 8/26/2016 | | | | | | |
| 8/19/2016 | P6 | 8/19/2016 | | | | | | |
| 8/12/2016 | P5 | 8/11/2016 | | | | | | |
| 8/5/2016 | P4 | 8/5/2016 | | | | | | |
| 7/29/2016 | P3 | 7/29/2016 | | | | | | |
| 7/15/2016 | P2 | 7/15/2016 | | | | | | |
| 7/1/2016 | P1 | 7/5/2016 | CLO | 4 | \$491.30 | | \$491.30 | \$491.30 |
| 6/10/2016 | M5 | 6/17/2016 | CLO | 7 | \$32.54 | | \$32.54 | \$32.54 |
| 5/10/2016 | M4 | 5/9/2016 | | | | | | |
| 4/11/2016 | M3 | 4/11/2016 | | | | | | |
| 3/10/2016 | M2 | 3/18/2016 | CLO | 8 | \$50.00 | | \$50.00 | \$50.00 |
| 2/10/2016 | M1 | 2/10/2016 | | | | | | |
| 1/11/2016 | M12 | 1/10/2016 | | | | | | |
| 12/10/2015 | M11 | 12/14/2015 | CLO | 4 | \$0.00 | | \$0.00 | \$0.00 |
| 11/10/2015 | M10 | 12/14/2015 | CLO | 34 | \$0.00 | | \$0.00 | \$0.00 |
| 10/13/2015 | M9 | 10/23/2015 | CLO | 10 | \$12.50 | | \$12.50 | \$12.50 |

EXHIBIT 9



**Florida Department of State
Division of Elections**

**2016 General Election
Laurel S. Bennett (REP)
State Representative**

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.

| | Filing Period | Contributions | | | Expend | Other | Transfers |
|----------------------------------|---------------------------|-----------------|--------------|---------------|-----------------|---------------|-------------|
| | | Monetary | Loans | InKind | | | |
| <input type="radio"/> | 09/17/2015 - 09/30/2015 | 0.00 | 50.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 10/01/2015 - 10/31/2015 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| <input type="radio"/> | 11/01/2015 - 11/30/2015 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| <input type="radio"/> | 12/01/2015 - 12/31/2015 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| <input type="radio"/> | 01/01/2016 - 01/31/2016 | 1,100.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| <input type="radio"/> | 02/01/2016 - 02/29/2016 | 200.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| <input type="radio"/> | 03/01/2016 - 03/31/2016 | 0.00 | 0.00 | 0.00 | 200.00 | 0.00 | 0.00 |
| <input type="radio"/> | 04/01/2016 - 04/30/2016 | 0.00 | 0.00 | 0.00 | 79.98 | 79.98 | 0.00 |
| <input type="radio"/> | 05/01/2016 - 05/31/2016 | 1,495.00 | 0.00 | 0.00 | 158.78 | 0.00 | 0.00 |
| <input type="radio"/> | 06/01/2016 - 06/24/2016 | 570.00 | 0.00 | 250.00 | 2,162.74 | 0.00 | 0.00 |
| <input type="radio"/> | 06/25/2016 - 07/08/2016 | 0.00 | 0.00 | 0.00 | 282.79 | 0.00 | 0.00 |
| <input type="radio"/> | 07/09/2016 - 07/22/2016 | 275.00 | 0.00 | 0.00 | 234.00 | 0.00 | 0.00 |
| <input type="radio"/> | 07/23/2016 - 07/29/2016 | 1,000.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| <input type="radio"/> | 07/30/2016 - 08/05/2016 | 250.00 | 0.00 | 0.00 | 729.07 | 0.00 | 0.00 |
| <input type="radio"/> | 08/06/2016 - 08/12/2016 | 200.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| <input type="radio"/> | 08/13/2016 - 08/25/2016 | 0.00 | 0.00 | 0.00 | 435.87 | 174.36 | 0.00 |
| <input type="radio"/> | 08/26/2016 - 09/02/2016 | 100.00 | 0.00 | 0.00 | 194.95 | 161.78 | 0.00 |
| <input type="radio"/> | 09/03/2016 - 09/16/2016 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| W | 09/17/2016 - 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 |
| <input type="radio"/> | 10/08/2016 - 10/14/2016 | 1,100.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| <input type="radio"/> | 10/15/2016 - 10/21/2016 | 0.00 | 0.00 | 0.00 | 575.00 | 0.00 | 0.00 |
| <input type="radio"/> | 10/22/2016 - 11/03/2016 | 1,250.00 | 0.00 | 0.00 | 1,745.00 | 0.00 | 0.00 |
| <input type="radio"/> | 11/04/2016 - 02/04/2017 | 0.00 | 0.00 | 0.00 | 320.78 | 0.00 | 0.00 |
| <input checked="" type="radio"/> | All Dates (Totals) | 7,540.00 | 50.00 | 250.00 | 7,118.96 | 416.12 | 0.00 |

EXHIBIT 10(1 of 3)

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 10 (2 of 3)



Florida Department of State
Division of Elections

Campaign Contributions

2016 General Election
Laurel S. Bennett (REP)
State Representative

[About the Campaign Finance Data Base](#)

| Rpt Yr | Rpt Type | Date | Amount | Contributor Name | Address | City State Zip | Occupation | Typ | InKind | Desc |
|--------|----------|------------|----------|------------------|----------------------------|----------------------------|--------------------|-----|--------|------|
| 2016 | M5 | 05/08/2016 | 50.00 | DAVIDSON LISA | 2806 CLEARWATER TERRACE SE | CONYERS, GA 30013 | RETIRED | CAS | | |
| 2016 | M5 | 05/08/2016 | ⇒ 100.00 | DAVIDSON LISA | 2806 CLEARWATER TERRACE | CONYERS, GA 30013 | | CHE | | ↕ |
| 2016 | M5 | 05/12/2016 | 50.00 | BALABAN BORIS | 147 ROYCOURT CIRCLE | ROYAL PALM BEACH, FL 33411 | TELECOMMUNICATIONS | CAS | | |
| 2016 | M5 | 05/12/2016 | ⇒ 500.00 | BALABAN BORIS | 147 ROYCOURT CIRCLE | ROYAL PALM BEACH, FL 33411 | TELECOMMUNICATIONS | CHE | | ↕ |
| 2016 | M5 | 05/13/2016 | 50.00 | MATTEOLA MATTY | 475 GREENWAY BLVD | ROYAL PALM BEACH, FL 33411 | MAYOR | CAS | | |
| 2016 | M5 | 05/13/2016 | ⇒ 100.00 | MATTEOLA MATTY | 475 GREENWAY BLVD | ROYAL PALM BEACH, FL 33411 | | CHE | | ↕ |
| 2016 | M5 | 05/19/2016 | 20.00 | PRUDENTE PAULA | 1836 EMILTO LANE | WEST PALM BEACH, FL 33401 | TEACHER | CAS | | |
| 2016 | M5 | 05/20/2016 | 25.00 | BALABAN BORIS | 147 ROYCOURT CIRCLE | ROYAL PALM BEACH, FL 33411 | TELECOMMUNICATIONS | CAS | | |
| 2016 | M5 | 05/23/2016 | 50.00 | ELLIOTT NANCY | 7007 SUMMIT OAK DR | EDMOND, OK 73034 | AIRCRAFT MECHANIC | CAS | | |
| 2016 | M5 | 05/23/2016 | ⇒ 100.00 | ELLIOTT NANCY | 7007 SUMMIT OAK DR | EDMOND, OK 73034 | | CHE | | ↕ |
| 2016 | M5 | 05/27/2016 | 50.00 | PETRITIS LAURIE | 7530 LAUDEN DR | LAKE WORTH, FL 33467 | RETIRED HEALTHCARE | CAS | | |
| 2016 | M5 | 05/28/2016 | ⇒ 100.00 | MATTHEWS JAMES | 1350 SW 26TH AVE | BOYNTON BEACH, FL 33426 | FACILITIES | CHE | | ↕ |
| 2016 | M5 | 05/28/2016 | 50.00 | MATTHEWS JAMES | 1350 SW 26TH AVE | BOYNTON BEACH, FL 33426 | FACILITIES | CAS | | |
| 2016 | M5 | 05/30/2016 | 250.00 | TATE STANLEY | 1175 NE 125TH ST | N. MIAMI, FL 33161 | PHILANTHROPY | CHE | | |

1,495.00

14 Contribution(s) Selected

[Query the Campaign Finance Data Base](#)

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

EXHIBIT 10(3 of 3)

**FLORIDA ELECTIONS COMMISSION
PHONE LOG
Case No.: FEC 16-756**

Respondent: Lisa Davidson

Complainant: Division of Elections

1. **Date and time:** 04/19/17; 2:57 p.m.
Name: Respondent—Lisa Davidson
Phone #: 404-909-3496
Summary: I phoned and reached her voice-mailbox, "Lisa"; I identified myself, provided my contact number, requested she return my call regarding this case, and referenced the case number.
Memo to File? No
Entered by: HH
2. **Date and time:** Thursday, 04/20/17; 8:47 a.m.
Name: Respondent—Lisa Davidson
Phone #: UNK
Summary: She returned my call and reached my voice-mailbox; she identified herself, indicated she was returning my call and provided her cell phone number: 404-909-3496.
Memo to File? No
Entered by: HH
3. **Date and time:** Friday, 04/21/17; 11:10 a.m.
Name: Respondent—Lisa Davidson
Phone #: 404-909-3496
Summary: I phoned and reached her voice-mailbox, "Lisa"; I identified myself, provided my contact number, requested she return my call regarding this case, and indicated if she reaches my voice-mailbox again to provide the best time to reach her.
Memo to File? No
Entered by: HH
4. **Date and time:** 04/21/17; 11:58 a.m.
Name: Respondent—Lisa Davidson
Phone #: UNK
Summary: Respondent returned my call, apologized for missing my earlier call, indicated she will have her cell phone with her today, and noted she will be off Monday and may be reached between 11:00 a.m. and 12 noon.
Memo to File? No
Entered by: HH
5. **Date and time:** 06/06/17; 5:42 p.m.
Name: Laurel S. Bennett, 2016 candidate, State Representative, District 86
Phone #: 561-379-5335

EXHIBIT 11(1 of 5)

Summary: I phoned the candidate since Respondent had waived confidentiality, identified myself, and requested to speak with Ms. Bennett; she confirmed I had reached her and apologized for the road noise as she was driving in Florida. I requested information regarding the cash contributions identified in her 2016 M5 Report; Ms. Bennett declared all campaign contributions she received at issue were by check or through her campaign website; she affirmed she did not receive any cash contributions. She said a "fellow" created her website and used a contribution platform like "fund me" or another vendor; Ms. Bennett was uncertain of the platform used and must check her records. I asked if it was PayPal; she said she wished he had used PayPal as it was cheaper. Ms. Bennett said a large portion from each contribution made through her campaign website was deducted by the platform vendor for fees, and she will never use that vendor again if she seeks another office. I asked her to provide her email address so I may confirm our conversation, and identify the campaign contributions at issue; Ms. Bennett agreed to search her records to confirm they were not cash campaign contributions, noting she has all the records; however, she is uncertain if her records are at her home in Georgia or her home in Florida. She will try to locate the records, and respond to my request. Ms. Bennett provided her email address: laurel.bennett@phrsolutions.org.

Memo to File? No

Entered by: HH

6. **Date and time:** 06/07/17; 9:50 a.m.

Name: Laurel S. Bennett, 2016 candidate, State Representative, District 86

Phone #: 561-379-5335

Summary: Ms. Bennett phoned, asked if I had emailed the information to her as we discussed last night; I confirmed I had sent a list of the contributions in question (including date of contribution, name of contributor, and amount of contribution), and asked her to verify her email address. She confirmed I had the correct email address. Ms. Bennett said she has not checked her emails this morning, but will within the next 30 minutes. She indicated she was home, had all relevant records on her kitchen counter, agreed to verify the information, and let me know within about 30 minutes.

Memo to File? No

Entered by: HH

7. **Date and time:** 06/07/17; 10:05 a.m.

Name: Laurel S. Bennett, 2016 candidate, State Representative, District 86

Phone #: 561-379-5335

Summary: Ms. Bennett phoned, asked if I had received her response; I confirmed I just received it and was viewing it when she called. She said the contributions identified as cash were made through Raise the Money platform except the contribution from Matty Mattiolia who was not listed as a contributor by Raise the Money. She also noted the dates identified by Raise the Money may be different from the dates I provided to her by email (as disclosed on her 2016 M5 Report). Ms. Bennett said Matty Mattiolia is in his late eighties, and probably made his campaign contribution by check as he (probably) does not know how to make an online contribution. Ms. Bennett agreed to see if this is correct.

Memo to File? No

Entered by: HH

EXHIBIT 11 (2 of 5)

8. **Date and time:** 06/07/17; 10:39 a.m.
Name: Laurel S. Bennett, 2016 candidate, State Representative, District 86
Phone #: 561-379-5335
Summary: She said she found a check receipt for Matty Mattiolia; however, the date is very different (January rather than May), and acknowledged the handwritten notation is "my handwriting." Ms. Bennett was unable to explain why the check contribution was reported on her 2016 M5 Report. She said, "It is what it is." She said she did not locate another check from Mr. Mattiolia. Ms. Bennett explained it was very difficult to get Raise the Money to release funds (campaign contributions made through her campaign website) to her campaign bank account. She agreed to make a snapshot of the check receipt as before, and send it to me by email. Ms. Bennett asked if I needed anything else; I indicated this should be all I need now. [Note: Matty Mattiolia served a total of 22 years in Royal Palm Beach: former councilman (1994-2010); and former mayor (three two-year terms, 2010-2016). Ms. Bennett ran unsuccessfully against Mayor Mattiolia in 2014.]
Memo to File? No
Entered by: HH
9. **Date and time:** 06/07/17; 4:25 p.m.
Name: Respondent—Lisa Davidson
Phone #: 404-909-3496
Summary: I phoned and reached her voice-mailbox indicating I had reached "Lisa"; I identified myself, provided my contact number, explained how she may reach me after normal business hours, between 5 p.m. and 6 p.m., requested she return my call regarding this case as I have spoken with Ms. Bennett, and have several questions.
Memo to File? No
Entered by: HH
10. **Date and time:** 06/14/17; 5:25 p.m.
Name: Laurel S. Bennett, 2016 candidate, State Representative, District 86
Phone #: 561-379-5335
Summary: I phoned, Ms. Bennett answered my call, and I identified myself; I explained I had attempted to contact her campaign treasurer, (Respondent Lisa Davidson); however, she has not returned my call. I continued, it appears Ms. Davidson amended the CTR, and added check contributions (originally cash contributions that were of concern to the DOE) at some point, but they are still identified as cash contributions on Ms. Bennett's 2016 M5 Report; Ms. Bennett said, "Oh, my God," said she was in a meeting, and agreed to return my call "in ten minutes."
Memo to File? No
Entered by: HH
11. **Date and time:** 06/15/17; 11:37 a.m.
Name: Kristi Reid Bronson, Chief, DOE, Bureau of Election Records
Phone #: 245-6240
Summary: I phoned, identified myself to unidentified female voice, explained I wished to get clarification regarding Ms. Bronson's email to me yesterday, requested to speak with Ms. Bronson, and my call was directed to her voice-mailbox; I identified myself, provided

EXHIBIT 11 (3 of 5)

my contact number and explained I had questions regarding her email response dated 06/14/17, re: candidate account # 64923.

Memo to File? No

Entered by: HH

12. **Date and time:** 06/15/17; 1:48 p.m.

Name: Stacy Bagley, DOE, Bureau of Election Records

Phone #: 245-6280 (caller I.D.)

Summary: She phoned, identified herself, explained she is returning my call to Ms. Bronson; I explained in response to my query regarding any remaining issues with the candidate's 2016 M5 Report, I received Ms. Bronson's email yesterday indicating, "The errors were cash contributions which should have been returned when the candidate was notified of the problem and then updated the report appropriately. The contributions were never returned and now that the campaign is over there is really nothing that can be amended. The issues that remain are that 1) they accepted excessive cash contributions and failed to return them; and 2) failed to timely file an amendment or correction within the 7 days of receipt of the Division's letter."

I continued, and explained I received a copy of the 2016 M5 Report, including summary page, itemized contribution page, itemized expenditure page, queued items, etc., from Joel Mynard in April (19,) 2017. The itemized contribution page indicates the contributions at issue are "cash." And it appears the report was last updated 07/05/16, even though the queued items indicate several amendments were filed. However, when I go to the DOE's website, review the candidate's campaign finance activity for the 2016 M5 Report, it appears the contributions at issue are "check" contributions; and it appears two responses are available on the DOE's website indicating the treasurer had provided written explanations indicating the contributions at issue were identified as cash contributions but were made through the candidate's website. Therefore, they should have been disclosed as check contributions and it appears the CTR was amended on several occasions, as recently as April 2017.

I said I wished to know why the 2016 M5 Report itemized contributions ("type") at issue do not correspond to the contributions ("type") identified in the candidate's online campaign finance activity, and the amendments identified in the queued items are not reflected in the 2016 M5 Report; I noted it appears the 2016 M5 Report was not an accurate reflection of the records available on the DOE's website; she was uncertain and agreed to ask Ms. Bronson.

Memo to File? No

Entered by: HH

13. **Date and time:** 06/15/17; 1:58 p.m.

Name: Stacy Bagley, DOE, Bureau of Election Records

Phone #: 245-6280 (caller I.D.)

Summary: She returned my call, identified herself, and explained that Ms. Bronson said the "conflicting" written explanations from the treasurer were rejected, and were not received within 7 days of the DOE's letter; therefore, the 2016 M5 Report reflects the activity prior to the DOE's notice letters to the campaign treasurer/Respondent. I noted

EXHIBIT 11 (4 of 5)

when one considers the two written explanations she filed with the DOE, it appears she believed online contributions should be disclosed as "cash"; however, later (perhaps after speaking with the DOE Help Desk staff) she determined they should be disclosed as "check" contributions, and filed amendments accordingly.

Memo to File? No

Entered by: HH

14. **Date and time:** 06/15/17; 3:20 p.m.

Name: Respondent—Lisa Davidson

Phone #: 404-909-3496 (caller I.D.)

Summary: Respondent returned my call, apologized for the delay, and indicated she is trying to work which makes it difficult to return calls during the day. I explained I wish to conduct an interview by telephone, review my findings with her, and give her an opportunity to respond to the information gathered during the course of the investigation concerning the allegations made in the complaint against her; I reviewed the highlights noting her original response was not received within 7 days.

Respondent said she called the Help Desk on multiple occasions, attempting to correct the errors; however, her efforts were hampered by the candidate having all the campaign finance records and Respondent having to wait for (candidate) Ms. Bennett to respond to her queries during the campaign. I said the DOE phone log (History Notes) does not reflect her calls to the Help Desk; however, it appears her remarks on the error reports filed with the DOE suggest she had spoken with the DOE staff.

Respondent said she was trying to help her friend, had to leave all the campaign records with Ms. Bennett when she moved from Florida, did her best as a first-time treasurer, was overwhelmed by it all, and now she is concerned she may go to jail. I indicated this case is not criminal but a civil penalty may be imposed by the Commission; Respondent said a fine was better than going to jail—she just does not want to go to jail. I provided a review of our process and timeline involved. She thanked me for my courtesies. I confirmed her contact information is correct.

Memo to File? No

Entered by: HH

15. **Date and time:**

Name:

Phone #:

Summary:

Memo to File? No

Entered by:

16. **Date and time:**

Name:

Phone #:

Summary:

Memo to File? No

Entered by:

EXHIBIT 11(5 of 5)

Calendar of Reporting Dates

for 2016 Candidates registered with the Division of Elections

| <u>Cover Period</u> | <u>Report Code</u> | <u>Due Date</u> |
|---------------------|--------------------|-----------------|
| 12/01/15 - 12/31/15 | 2015 M12 | 01/11/16 |
| 01/01/16 - 01/31/16 | 2016 M1 | 02/10/16 |
| 02/01/16 - 02/29/16 | 2016 M2 | 03/10/16 |
| 03/01/16 - 03/31/16 | 2016 M3 | 04/11/16 |
| 04/01/16 - 04/30/16 | 2016 M4 | 05/10/16 |
| 05/01/16 - 05/31/16 | 2016 M5 | 06/10/16 |

| | | |
|---------------------|---------|----------|
| 06/01/16 - 06/24/16 | 2016 P1 | 07/01/16 |
| 06/25/16 - 07/08/16 | 2016 P2 | 07/15/16 |
| 07/09/16 - 07/22/16 | 2016 P3 | 07/29/16 |
| 07/23/16 - 07/29/16 | 2016 P4 | 08/05/16 |
| 07/30/16 - 08/05/16 | 2016 P5 | 08/12/16 |
| 08/06/16 - 08/12/16 | 2016 P6 | 08/19/16 |
| 08/13/16 - 08/25/16 | 2016 P7 | 08/26/16 |

| | | |
|---------------------|---------|----------|
| 08/26/16 - 09/02/16 | 2016 G1 | 09/09/16 |
| 09/03/16 - 09/16/16 | 2016 G2 | 09/23/16 |
| 09/17/16 - 09/30/16 | 2016 G3 | 10/07/16 |
| 10/01/16 - 10/07/16 | 2016 G4 | 10/14/16 |
| 10/08/16 - 10/14/16 | 2016 G5 | 10/21/16 |
| 10/15/16 - 10/21/16 | 2016 G6 | 10/28/16 |
| 10/22/16 - 11/03/16 | 2016 G7 | 11/04/16 |

Termination Reports

| <u>Cover Period</u> | <u>Report Code</u> | <u>Due Date</u> |
|-----------------------|--------------------|-----------------|
| After May Qualifying | TR | 08/04/16 |
| After June Qualifying | TR | 09/22/16 |
| Primary Election | TR | 11/28/16 |
| General Election | TR | 02/06/17 |



FLORIDA DEPARTMENT OF STATE

Ken Detzner
Secretary of State

DIVISION OF ELECTIONS

July 28, 2016

Lisa Davidson, Treasurer for
Candidate Laurel S. Bennett
2806 Clearwater Terr SE
Conyers, GA 30013

Re: CAN 64923

Dear Ms. Davidson:

The Division of Elections has determined that one or more campaign reports are incomplete for the reasons noted in the attached error report.

Pursuant to Section 106.07(2), Florida Statutes, you have 7 days from receipt of this notice to file an amended report to correct errors or provide missing information. If the information has been reported accurately, provide a written explanation to the Division addressing the issue noted in the error report. Please be advised that failure to supply this information within the time allowed may constitute a violation of Chapter 106, Florida Statutes.

If you need assistance in filing an amendment, please contact the Division's help line at (850) 245-6280.

Sincerely,

Kristi Reid Bronson
Chief, Bureau of Election Records

Attachment

cc: Laurel S. Bennett, Candidate

EXHIBIT 13(1 of 2)

Error Report

Candidate: Laurel S. Bennett

Office: STR

Report: 2016 M5 (9) Covering Period: 5/1/16 - 5/31/16

Account: 64923

Contributions

| | | Contributor | | | Contribution | | | | | | |
|--|----------|-----------------|----------------------------|----------------------------|--------------|--------------------|------|----------|--------|---------|-------|
| Seq | Date | Name | Address | City/State/Zip | Type | Occupation | Type | Amount | InKind | Descrip | Amend |
| 7 | 05/28/16 | MATTHEWS JAMES | 1350 SW 26TH AVE | BOYNTON BEACH, FL 33426 | I | FACILITIES | CAS | \$100.00 | | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | | | |
| 4 | 05/08/16 | DAVIDSON LISA | 2806 CLEARWATER TERRACE SE | CONYERS GA 30013 | I | RETIRED | CAS | \$100.00 | | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | | | |
| 3 | 05/12/16 | BALABAN BORIS | 147 ROYCOURT CIRCLE | ROYAL PALM BEACH, FL 33411 | I | TELECOMMUNICATIONS | CAS | \$500.00 | | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | | | |
| 1 | 05/13/16 | MATTEOLIA MATTY | 475 GREENWAY BLVD | ROYAL PALM BEACH FL 33411 | I | MAYOR | CAS | \$100.00 | | | |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | | | |
| 8 | 05/23/16 | ELLIOTT NANCY | | OKLAHOMA CITY, OK | I | AIRCRAFT MECHANIC | CAS | \$100.00 | | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | | | |
| *No Address Was Provided | | | | | | | | | | | |

Contributions

Transfers

Contributions

EXHIBIT 13(2 of 2)



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

Second Notice

August 15, 2016

Lisa Davidson, Treasurer for
Candidate Laurel S. Bennett
2806 Clearwater Terr SE
Conyers, GA 30013

Re: CAN 64923

Dear Ms. Davidson:

On July 28, 2016, you were advised that one or more of your campaign treasurer's reports were incomplete and that you had 7 days to provide the requested information.

Our records indicate that changes to the report were made, however, the reports are still incomplete. Enclosed is a second error report. Please provide the requested information within 7 days of the date of this letter. Thank you for your cooperation.

Sincerely,

Kristi Reid Bronson, Chief
Bureau of Election Records

Attachment

cc: Laurel S. Bennett, Candidate

EXHIBIT 14(1 of 2)

Error Report

late: Laurel S. Bennett

Office: STR

ort: 2016 M5 (9) Covering Period: 5/1/16 - 5/31/16

Account: 64923

nts

Contributor

Contribution

| Date | Name | Address | City/State/Zip | Type | Occupation | Type | Amount | InKind Descrip | Amend |
|--|-----------------|----------------------------|----------------------------|------|--------------------|------|----------|----------------|-------|
| 05/28/16 | MATTHEWS JAMES | 1350 SW 26TH AVE | BOYNTON BEACH, FL 33426 | 1 | FACILITIES | CAS | \$100.00 | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | |
| 05/08/16 | DAVIDSON LISA | 2806 CLEARWATER TERRACE SE | CONYERS GA 30013 | 1 | RETIRED | CAS | \$100.00 | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | |
| 05/12/16 | BALABAN BORIS | 147 ROYCOURT CIRCLE | ROYAL PALM BEACH, FL 33411 | 3 | TELECOMMUNICATIONS | CAS | \$500.00 | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | |
| 05/13/16 | MATTEOLIA MATTY | 475 GREENWAY BLVD | ROYAL PALM BEACH FL 33411 | 3 | MAYOR | CAS | \$100.00 | | |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | |
| 05/23/16 | ELLIOTT NANCY | | OKLAHOMA CITY, OK | 1 | AIRCRAFT MECHANIC | CAS | \$100.00 | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | |
| *No Address Was Provided | | | | | | | | | |

res

nfers

tributions

8/15/16

* Cash contributions changed to check, written explanation required.

EXHIBIT 14 (2 of 2)



FLORIDA DEPARTMENT OF STATE

Ken Detzner
Secretary of State

DIVISION OF ELECTIONS

FINAL NOTICE

Delivery Confirmation:

USPS TRACKING # **9114 9014 9645 0382 4752 06**
& CUSTOMER RECEIPT For Tracking or inquiries go to USPS.com
or call 1-800-222-1811.

September 20, 2016

Lisa Davidson, Treasurer for
Candidate Laurel S. Bennett
2806 Clearwater Terr SE
Conyers, GA 30013

Re: CAN 64923

Dear Ms. Davidson:

You have previously been advised that one or more campaign treasurer's reports are incomplete for the reasons noted in the attached error report.

Pursuant to Section 106.07(2), Florida Statutes, you have 7 days from receipt of this letter to correct errors or provide missing information. If the information has been reported accurately, you must provide a written explanation to the Division addressing the issue noted in the error report. Please be advised that if you fail to comply with this request, the Division will forward this matter to the Florida Elections Commission for further action. Section 106.265(1), Florida Statutes, authorizes the Florida Elections Commission to impose civil penalties of up to \$1,000 per violation.

If you need assistance in filing an amendment, please contact the Division's help line 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

Attachment

cc: Laurel S. Bennett, Candidate

EXHIBIT 15 (1 of 2)

Error Report

e: Laurel S. Bennett

Office: STR

t: 2016 M5 (9) Covering Period: 5/1/16 - 5/31/16

Account: 64923

| Contributor | | | | Contribution | | | | | |
|--|-----------------|----------------------------|-----------------------------|--------------|--------------------|------|----------|----------------|-------|
| Date | Name | Address | City/State/Zip | Type | Occupation | Type | Amount | InKind Descrip | Amend |
| 05/28/16 | MATTHEWS JAMES | 1350 SW 26TH AVE | BOYNTON BEACH, FL 3-3426 | 1 | FACILITIES | CAS | \$100.00 | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | |
| 05/08/16 | DAVIDSON LISA | 2806 CLEARWATER TERRACE SE | CONYERS, GA 3-0013 | 1 | RETIRED | CAS | \$100.00 | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | |
| 05/12/16 | BALABAN BORIS | 147 ROYCOURT CIRCLE | ROYAL PALM BEACH, FL 3-3411 | 1 | TELECOMMUNICATIONS | CAS | \$500.00 | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | |
| 05/13/16 | MATTEOLIA MATTY | 475 GREENWAY BLVD | ROYAL PALM BEACH FL 3-3411 | 1 | MAYOR | CAS | \$100.00 | | |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | |
| 05/23/16 | ELLIOTT NANCY | | OKLAHOMA CITY, OK | 1 | AIRCRAFT MECHANIC | CAS | \$100.00 | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | |
| *No Address Was Provided | | | | | | | | | |

* 9/20/16
 Written Response received but needs to be signed, and need to show the refunds of the cash contributions over \$50.

8/15/16

* Cash contributions changed to check, written explanation required.

You told me I couldn't put them in as cash even though they were, so I put them in as checks. What was I

RECEIVED
 16 AUG 26 AM 9:57
 DIVISION OF ELECTIONS
 SECRETARY OF STATE

E-mail: 15(2062)

ALERT: The Postal Service is monitoring the progress of Hurricane Matthew. Check for updates on which service areas may be affected. Read More >



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Tracking Number: 9114901496450382475206

Updated Delivery Day: Thursday, September 22, 2016

Product & Tracking Information

Postal Product:

Features:

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Available Actions

[Text Updates](#)

[Email Updates](#)

| DATE & TIME | STATUS OF ITEM | LOCATION |
|-------------------------------|--------------------------|-------------------|
| September 22, 2016 , 12:23 pm | Delivered, In/At Mailbox | CONYERS, GA 30013 |

Your item was delivered in or at the mailbox at 12:23 pm on September 22, 2016 in CONYERS, GA 30013.

| | | |
|-------------------------------|--------------------------|------------------------|
| September 22, 2016 , 9:24 am | Out for Delivery | CONYERS, GA 30013 |
| September 22, 2016 , 9:14 am | Sorting Complete | CONYERS, GA 30013 |
| September 22, 2016 , 7:09 am | Arrived at Post Office | CONYERS, GA 30013 |
| September 21, 2016 , 12:59 pm | Arrived at USPS Facility | ATLANTA, GA 30369 |
| September 21, 2016 , 2:56 am | Arrived at USPS Facility | JACKSONVILLE, FL 32099 |
| September 20, 2016 , 11:11 pm | Departed USPS Facility | TALLAHASSEE, FL 32301 |
| September 20, 2016 , 8:47 pm | Arrived at USPS Facility | TALLAHASSEE, FL 32301 |

Track Another Package

Tracking (or receipt) number

[Track It](#)

Manage Incoming Packages

Track all your packages from a dashboard. No tracking numbers necessary.

[Sign up for My USPS >](#)



CONFIRM 16

AFFIDAVIT

STATE OF FLORIDA

County of Leon

Kristi Reid Bronson, being duly sworn, says:

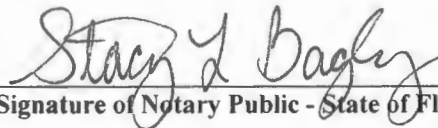
1. I am the Chief of the Bureau of Election Records of the Division of Elections (Division). In that capacity, I oversee the Division's duties related to the filing of campaign finance reports.
2. This affidavit is made upon my personal knowledge, including information obtained from review of the attached records, of which I am the custodian.
3. I am of legal age and competent to testify to the matters stated herein.
4. Laurel S. Bennett (64923) is a 2016 candidate for the office of State Representative.
5. On September 17, 2015, Ms. Bennett filed the Appointment of Campaign Treasurer and Designation of Campaign Depository with the Division. She appointed Lisa Davidson as treasurer. (See attached documents and acknowledgment letter.)
6. On July 28, 2016, the Division mailed Ms. Davidson notification that the 2016 M5 campaign treasurer's report was incomplete. (See attached letter.)
7. On August 15, 2016, the Division mailed Ms. Davidson notification that the 2016 M5 campaign treasurer's report was incomplete. The excessive cash contributions had not been reported refunded to the contributors. (See attached letter.)
8. On September 20, 2016, the Division mailed Ms. Davidson final notification with delivery confirmation that the 2016 M5 campaign treasurer's report was incomplete. The excessive cash contributions had not been reported refunded to the contributors. (See attached letter and delivery confirmation.)

9. As of December 6, 2016, the 2016 M5 campaign treasurer's report remains incomplete. The excessive cash contributions have not been reported refunded to the contributors.

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 December, 2016.



Signature of Notary Public - State of Florida

Print, Type, or Stamp Commissioned Name of Notary Public
Personally Known



EXHIBIT 17 (2 of 4)

Account/Seq 64923 3

Election/Type

20161108-GEN

Laurel S. Bennett

CAN

| Status/Reviewer | Mailed | Type/Recd | R E S P O N S E | |
|-----------------|----------------|-----------|-----------------|-----------|
| HL zjsantos | 1st: 7/28/2016 | RSP | | |
| 9/20/16 8:56 am | 2nd: 8/15/2016 | 9/22/2016 | WR1 | 8/26/2016 |
| | 3rd: 9/20/2016 | | WR1 | 9/19/2016 |

NOTES: 11/1/16- Contribution refunds have not been shown. Referring to FEC. ejr
 10/21/16- Hold for 2016 G6 to show cash contributions. If not, do FEC referral. ejr
 10/18/16- Spoke with treasurer and we reported correctly the cash contributions; however, the refunds have not been sent out. I told Ms. Davidson that she needs to get a hold of the candidate, have Ms. Bennett write out refunds to the contributors for their large cash contribtions and I'd assist Ms. Davidson in reporting those correctly on the next report. ejr
 10/17/16- Treasurer called back but had to leave a message. I will try to call her tomorrow. ejr
 10/17/16- Attempted to reach treasurer in order to make the corrections but had to leave a message. ejr
 9/19/2016 - Second written response received, but it is not signed - stb
 8/26/16 - Written response received, but it is not signed - slb

17 (3 of 4)

Cash and Loan Contributions

2016 - M5

12/5/2016 4:30:00 PM

Laurel S. Bennett

64923

Type: CAS

| Contributor | Date | Seq # | Amount |
|-------------------|---------|-------|--------------------|
| BALABAN - BORIS | 5/12/16 | 3 | \$50.00 |
| | 5/20/16 | 6 | \$25.00 |
| DAVIDSON - LISA | 5/8/16 | 4 | \$50.00 |
| | 5/8/16 | 12 | \$100.00 |
| ELLIOTT - NANCY | 5/23/16 | 8 | \$50.00 |
| | 5/23/16 | 11 | \$100.00 |
| HARTZHEIM - NOAH | 7/21/16 | 1 | \$25.00 |
| LISA - DAVIDSON | 6/21/16 | 2 | \$20.00 |
| MATTEOLA - MATTY | 5/13/16 | 13 | \$100.00 |
| MATTEOLIA - MATTY | 5/13/16 | 1 | \$50.00 |
| MATTHEWS - JAMES | 5/28/16 | 10 | \$50.00 |
| | 5/28/16 | 7 | \$100.00 |
| NEGRON - VICTOR | 6/21/16 | 6 | \$50.00 |
| PETRITIS - LAURIE | 5/27/16 | 5 | \$50.00 |
| PRUDENTE - PAULA | 5/19/16 | 2 | \$20.00 |
| TOTAL: CAS | | | \$840.00 |

Type: LOA

| Contributor | Date | Seq # | Amount |
|-------------------|---------|-------|----------------|
| BENNETT - LAUREL | 9/18/15 | 1 | \$50.00 |
| TOTAL: LOA | | | \$50.00 |

EXHIBIT 17 (4 of 4)



Re: Case No.: FEC 16-756

Laurel@PHR Solutions

to:

Helen Hinson

06/07/2017 10:11 AM

Hide Details

From: "Laurel@PHR Solutions" <laurel.bennett@phrsolutions.org>

To: Helen Hinson <Helen.Hinson@myfloridalegal.com>

<https://politics.raisethemoney.com/laurel/WP/>
staff@laurel-bennett.com Sign Out

RAISE THE MONEY
Laurel Bennett
<https://politics.raisethemoney.com/laurel/bennett>

| Accounts | Dashboard | Contributions |
|------------------|-------------------|-----------------|
| Statements | Campaigns | Events |
| Crowdfunding | Contribution Form | Finance Reports |
| Account Settings | User Settings | |

Contributions

| Campaign | Contributor Name | |
|-------------------------------------|---|------------|
| All | | |
| <input checked="" type="checkbox"/> | \$100 Nancy Elliott Aircraft Mechanic | 06/20/2016 |
| <input checked="" type="checkbox"/> | \$250 Lauren D. Lake DASH 5/31/17 | 06/19/2016 |
| <input checked="" type="checkbox"/> | \$50 Laurie Petritis - retired healthcare | 06/14/2016 |
| <input checked="" type="checkbox"/> | \$500 Boris Balaban - telecommunication | 06/12/2016 |
| <input checked="" type="checkbox"/> | \$100 James Matthews - Sailless Engineer | 06/08/2016 |
| <input checked="" type="checkbox"/> | \$100 Lisa Davidson - retired | 06/07/2016 |
| <input checked="" type="checkbox"/> | \$25 Boris Balaban - telecommunications | 06/07/2016 |

Here you go. I know We had issues with Raise the money releasing the money once the web site took it in.

Laurel Bennett CSE, MBA

CEO PHR Solutions

561.379.5335

www.PHRsolutions.org

On Jun 6, 2017, at 6:12 PM, Helen Hinson <Helen.Hinson@myfloridalegal.com> wrote:

Laurel S. Bennett

2016 candidate for State Representative, District 86

EXHIBIT 18(1 of 2)

Dear Ms. Bennett:

As we discussed by phone, please confirm the contributions were made through your campaign website and were not cash contributions to your 2016 campaign as identified as follows:

May 28, 2016, from James Matthews in the amount of \$100.00;
May 8, 2016, from Lisa Davidson in the amount of \$100.00;
May 12, 2016, Boris Balaban in the amount of \$500.00;
May 13, 2016, Matty Matteolia in the amount of \$100.00;
May 23, 2016, Nancy Elliott in the amount of \$100.00.

Thank you in advance for your assistance in resolving this matter. **Please confirm your receipt of this email communication.**

Helen Hinson

Investigation Specialist
Florida Elections Commission
The Collins Building, Ste. 224
107 West Gaines Street
Tallahassee, FL 32399-1050
helen.hinson@myfloridalegal.com
PH: 850.922.4539, extension 115
FAX: 850.921.0783
www.fec.state.fl.us

Please note: Florida has a very broad public records law. Written communications to or from me regarding state business constitute public records and are available to the public and media upon request **unless** the information is subject to a specific statutory exemption. Therefore, your e-mail message may be subject to public disclosure.

EXHIBIT 18 (2 of 2)



Re: Case No.: FEC 16-756

Laurel@PHR Solutions

to:

Helen Hinson

06/07/2017 10:41 AM

Hide Details

From: "Laurel@PHR Solutions" <laurel.bennett@phrsolutions.org>

To: Helen Hinson <Helen.Hinson@myfloridalegal.com>

| | | |
|--|--------------|----------|
| Account Number | 1 | |
| CHK 00297 | \$100.00 | |
| Number of Checks | \$100.00 | |
| Total Checks Amount | | Amount |
| Total Deposit | | \$100.00 |
| Deposit will be available: | | |
| Date | 01/06/2016 | |
| | <i>Moody</i> | |
| Transaction # | 067 0086 | |
| Time | 01:54PM | 01/06/16 |
| Deposit Credit Date: | 01/06/16 | |
| TIP: By creating a budget and tracking your daily spending, you may discover places to save. | | |
| Thank you, LUIS | | |

Hi Helen,

Here you go!

Thanks for all your help!

Sincerely,

Laurel Bennett CSE, MBA

CEO PHR Solutions

561.379.5335

www.PHRsolutions.org

On Jun 7, 2017, at 10:04 AM, Helen Hinson <Helen.Hinson@myfloridalegal.com> wrote:

19 (1 of 3)

Dear Ms. Bennett:

Thank you for your cooperation.

Helen Hinson
 Investigation Specialist
 Florida Elections Commission
 The Collins Building, Ste. 224
 107 West Gaines Street
 Tallahassee, FL 32399-1050
helen.hinson@myfloridalegal.com
 PH: 850.922.4539, extension 115
 FAX: 850.921.0783
www.fec.state.fl.us

Please note: Florida has a very broad public records law. Written communications to or from me regarding state business constitute public records and are available to the public and media upon request **unless** the information is subject to a specific statutory exemption. Therefore, your e-mail message may be subject to public disclosure.

"Laurel@PHR Solutions" <laurel.bennett@phrsolutions.org> wrote on 06/07/2017 10:02:46 AM:

> From: "Laurel@PHR Solutions" <laurel.bennett@phrsolutions.org>
 > To: Helen Hinson <Helen.Hinson@myfloridalegal.com>
 > Date: 06/07/2017 10:02 AM
 > Subject: Re: Case No.: FEC 16-756
 >
 > No worries here. They are legit.
 >
 > Laurel Bennett CSE, MBA
 > Candidate For House of Representatives District 86
 > CEO PHR Solutions
 > 561.379.5335
 > www.PHRsolutions.org
 >
 >
 > On Jun 6, 2017, at 6:12 PM, Helen Hinson
 <Helen.Hinson@myfloridalegal.com>
 > > wrote:
 >
 > Laurel S. Bennett
 > 2016 candidate for State Representative, District 86
 >
 > Dear Ms. Bennett:
 >
 > As we discussed by phone, please confirm the contributions were made
 > through your campaign website and were not cash contributions to
 > your 2016 campaign as identified as follows:
 >
 > May 28, 2016, from James Matthews in the amount of \$100.00;
 > May 8, 2016, from Lisa Davidson in the amount of \$100.00;
 > May 12, 2016, Boris Balaban in the amount of \$500.00;
 > May 13, 2016, Matty Matteolia in the amount of \$100.00;
 > May 23, 2016, Nancy Elliott in the amount of \$100.00.
 >
 > Thank you in advance for your assistance in resolving this matter.
 > Please confirm your receipt of this email communication.

> Helen Hinson
> Investigation Specialist
> Florida Elections Commission
> The Collins Building, Ste. 224
> 107 West Gaines Street
> Tallahassee, FL 32399-1050
> helen.hinson@myfloridalegal.com
> PH: 850.922.4539, extension 115
> FAX: 850.921.0783
> www.fec.state.fl.us
>

> Please note: Florida has a very broad public records law. Written
> communications to or from me regarding state business constitute
> public records and are available to the public and media upon request
unless
> the information is subject to a specific statutory exemption.
> Therefore, your e-mail message may be subject to public disclosure.

EXHIBIT 19(3 of 3)



FEC 16-756 - request for extension to respond is granted to 12/30/16
Florida Elections Commission to: Lisa Davidson
Sent by: Donna Malphurs

12/22/2016 12:02 PM

From: Florida Elections Commission/OAG
To: Lisa Davidson <leasdavidson50@gmail.com>

Ms. Davidson,

Thank you for your email. Your request for an extension to respond is granted. Please submit your response by December 30, 2016.

Sincerely,

Donna Ann Malphurs
Agency Clerk

Lisa Davidson

received certified mail yesterday in regards to... 12/22/2016 10:37:50 AM

From: Lisa Davidson <leasdavidson50@gmail.com>
To: "fec@myfloridalegal.com" <fec@myfloridalegal.com>
Date: 12/22/2016 10:37 AM
Subject: Case FEC-16-756

I received certified mail yesterday in regards to a complaint against me as treasurer for Laurel Bennett. The letter was dated December 8th I have moved I received the letter December 21st with no time to respond. I have asked for an extension.

The M5 campaign report I have tried to amend with the information provided to me by the candidate but not always in a timely manner from her. The contributions were thru a campaign contribution website that was linked to her campaign account nothing was actual cash money. I didn't know how to put the contributions in except as cash, when I was notified by the help desk that cash contributions could not exceed \$50.00 I spoke to Laurel she said change them to checks so I did, I was again contacted by Tallahassee that I could not do that so I called and spoke to someone that said to refund the excess money but since I moved I did not have the records. Laurel said that there was nothing to refund since it was not actual cash. Again I spoke to Laurel she said she would send the information in she had, I asked her repeatedly to send it in again she said she was trying to win the campaign and did not do so. I never had access to the checkbook for her campaign this being my first time as a treasurer I was unsure of my duties.

I am waiving my rights of confidentiality to speak to Laurel about this as we worked together on her reports since she provided me with the information for the reports. As suggested I am pleading a probable cause case.

EXHIBIT 20 (1 of 2)



Case FEC-16-756

Lisa Davidson

to:

fec@myfloridalegal.com

12/22/2016 10:37 AM

Hide Details

From: Lisa Davidson <leasdavidson50@gmail.com>

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

I received certified mail yesterday in regards to a complaint against me as treasurer for Laurel Bennett. The letter was dated December 8th I have moved I received the letter December 21st with no time to respond. I have asked for an extension.

The M5 campaign report I have tried to amend with the information provided to me by the candidate but not always in a timely manner from her. The contributions were thru a campaign contribution website that was linked to her campaign account nothing was actual cash money. I didn't know how to put the contributions in except as cash, when I was notified by the help desk that cash contributions could not exceed \$50.00 I spoke to Laurel she said change them to checks so I did, I was again contacted by Tallahassee that I could not do that so I called and spoke to someone that said to refund the excess money but since I moved I did not have the records. Laurel said that there was nothing to refund since it was not actual cash. Again I spoke to Laurel she said she would send the information in she had, I asked her repeatedly to send it in again she said she was trying to win the campaign and did not do so. I never had access to the checkbook for her campaign this being my first time as a treasurer I was unsure of my duties.

I am waiving my rights of confidentiality to speak to Laurel about this as we worked together on her reports since she provided me with the information for the reports. As suggested I am pleading a probable cause case.

EXHIBIT 20(2 of 2)

✓ ER
HH

RECEIVED

To: Amy McKeever Tomar
Executive Director

MAR 20 A 10:47
STATE OF FLORIDA
ELECTIONS COMMISSION

RE: FEC-16-756.

Dear Amy,

I am late filing my response I was ill the entire month of February.

If you need proof here is my doctors name and phone number: Dr. Vipay Malhotra
814-535-2321

Thank you,

Jiwa Davidson

State of Pennsylvania, County of Cambria

My current legal name is Lisa Davidson, and my current occupation is Unemployed. I am presently 58 years old, and my current address of residence is 219 Sauers Avenue, Johnstown, Pennsylvania 15906.

Probable Cause Statement Case FEC -16-756

I am not relaying false statements. I fully acknowledge that false statements are punishable by law, the facts in this statement are true to the best of my knowledge. The relevant facts supporting a probable cause determination are as follows:

On 9/17/15 when the candidate Laurel Bennett appointed me as treasurer I had not seen the paperwork she submitted so I was not aware it was legally binding. She spent her time in Florida campaigning as I was in her home in Georgia as caregiver for her terminally ill husband. She was in possession of the checkbook at all times and the receipts needed to input the reports, so as you can see she was my deputy treasurer, we both had input as to the contents of the reports. She would email me what paperwork she had for each report but not always in a timely manner. The candidate did all the banking since she was in Florida, I would see statements occasionally. You will need to get the candidate involved in this matter as she was my deputy treasurer.

On 8/15/16 for the M5 report the alleged cash contributions you are talking about were donations to a campaign website, it was not actual cash money given to her. I put them in as cash contributions because I didn't know how to put them in otherwise, I thought I was doing the correct thing. Tallahassee contacted me and said I could not do that so I spoke to the candidate and she said change them to checks so I thought it would be better so I did. Then Tallahassee contacted me again and said I couldn't do that either that I had to put them in as refunds so I did, at this point I was very confused as to what I was doing. I again spoke to the candidate and told her of the situation that since she had possession of the checkbook she needed to refund the money and she said No because it was not actual cash money and since they were contributions to the website there was

nothing to refund, I believed her since I had not seen any documentation or had access to the checkbook since she was in another state. I hereby state that the information above is true, to the best of my knowledge. I also confirm that the information here is both accurate and complete, and relevant information has not been omitted.

Signature of Individual

Lisa Davidson

Date 3/2/17

Caralynn Keen

Notary Public

Notary Public State of Pennsylvania

Title And Rank

8/9/2020

Date Of Commission Expiry

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Caralynn R. Keen, Notary Public
City of Johnstown, Cambria County
My Commission Expires Aug. 9, 2020

AFFIDAVIT OF BACKGROUND INFORMATION

Case Number: FEC 16-756

RECEIVED

2017 APR 28 P 12:51

STATE OF PENNSYLVANIA

County of Cambria

STATE OF FLORIDA
ELECTIONS COMMISSION

Lisa Davidson, being duly sworn, says:

1. This affidavit is made upon my personal knowledge.
2. I am of legal age and competent to testify to the matters stated herein. I am currently employed by N/A as _____.
3. Did you receive the acknowledgement letter (dated September 18, 2015) containing the electronic filing system (EFS) PIN and password, and instructing you to print Chapter 106, Florida Statutes, the *Candidate and Campaign Treasurer Handbook*, and the Calendar of Reporting Dates from the Division of Elections' website?
 Yes No
4. Did you print Chapter 106, Florida Statutes, per the instructions in the acknowledgement letter?
 Yes No *I read it online*
5. Did you read Chapter 106, Florida Statutes, per the instructions in the acknowledgement letter?
 Yes No
6. Did you print the *Candidate and Campaign Treasurer Handbook*, per the instructions in the acknowledgement letter?
 Yes No *I printed part of what I needed to use to input the reports*
7. Did you read the *Candidate and Campaign Treasurer Handbook*, per the instructions in the acknowledgement letter?
 Yes No *I read it online*
8. Did you print the Calendar of Reporting Dates, per the instructions in the acknowledgement letter?
 Yes No
9. Did you print the *Candidates EFS User's Guide*?
 Yes No
10. Did you read the *Candidates EFS User's Guide*?

EXHIBIT 52 (1 of 6)

Yes No I read it online

11. Did you read any other campaign related materials?

Yes No I looked over the various forms and looked over other campaign info online

12. If yes, please list the items below with a brief description of the information you received from these documents: myflorida.com library + info services

campaign finance database to see candidates contributions forms + publications to familiarize myself with election candidates + committees - campaign finance to look up information I was unsure of

13. This office received information about Laurel Bennett's 2016 M5 Report covering the reporting period of May 1 through 31, 2016 regarding the following: alleged cash contributions over the \$50 cash contribution limit including sequence numbers 1, 3, 4, 7 and 8; and your alleged failure to timely make amendments to the report after notice. The following questions and/or requests for documents relate to these allegations.

14. Based upon your sworn statement dated March 2, 2017, it appears candidate Laurel S. Bennett kept the checkbook, bank statements and receipts for expenditures. She forwarded information to you by email for you to complete the relevant campaign treasurer report. It also appears the alleged cash contributions over the \$50 cash contribution limit identified in the Error Report by the Division of Elections were electronic (debit or credit card) contributions made through the candidate's campaign website contribution button, and should have been categorized as a "check" for reporting purposes. (See Division of Elections Opinions 94-02 and 00-03, and page 24 of the Candidate and Campaign Treasurer Handbook, "Debit and Credit Card Contributions.") Please confirm if this is an accurate review of your sworn statement. If not, please explain in the following space.

It was not completed in a timely manner due to me being in Georgia taking care of her terminally ill husband and her being in Florida for her campaign. I repeatedly asked for her help thru text messages and emails but with no avail. Her response was the entries were not cash, it was thru her website, she asked I change them from cash to checks since there was no actual cash involved so I did just that.

15. You, Lisa Davidson, were identified in the Error Report for the 2016 M5 Report (covering the period of May 1 through 31, 2016) as having made a \$100 cash contribution to Ms. Bennett's 2016 campaign on May 8, 2016, sequence number 4. Please explain the following:

a.) whether you made the \$100 campaign contribution or not; b.) identify the payment method or by what means (cash, check, debit or credit card, money order, etc.) you made the contribution; c.) confirm whether you used the campaign website to make the contribution; and d.) provide a copy of the payment instrument (front and reverse of check, if applicable) or payment receipt/acknowledgment.

I contributed \$100 to her campaign she asked me to, thru the website. I used my debit card to make the transaction. I am attaching my bank statement as the contributions are all with Laurel in Florida with all the records since I moved to Pennsylvania in October 2016.

Why are you out to get me, I did nothing wrong.

16. Please identify the steps you took to correct any deficiencies with the 2016 M5 Report as identified in the Error Report at issue, and explain why you did not make changes to the 2016 M5 Report within 7 days after notice.

When I received the letter I spoke to the candidate as to what you said. Actually you were sending the notices to my Florida address of 1000 Crow St where I moved to Georgia, my ex husband would send them to me when he got around to it. You should also note that when you send out the notices it only gives you 1 or 2 days to change things. I never got them on time.

17. A handwritten and unsigned message on a copy of the Error Report at issue, was time-and-date stamped by the Division of Elections as filed on August 26, 2016, at 9:57 a.m., and says the following, "You told me I couldn't [sic] put them in as cash even though they were, so I put them in as checks. What was I supposed to do!" I have marked and enclosed it as **Attachment A**, for your review.

Then a second handwritten and unsigned message on a copy of the Error Report, was time-and-date stamped by the Division of Elections as filed on September 19, 2016, at 10:23 a.m., and says the following, "I sent a written explanation to you last month. I put these in as cash that went to a campaign fund online. You told me I couldn't [sic] put the actual \$100 amounts in as cash, so I changed them to checks. What else do you want me to do." I have marked and enclosed it as **Attachment B**, for your review.

22(3 of 6)

Please explain if you recognize the handwriting since both appear to be written by the same person but are unsigned, and please identify who made the handwritten notations on the Error Reports.

both me. I was confused as how to input contributions that were put into the website I would get a notification from the candidate that said "here are two contributions I 'think' they are cash, so I put them in as 00. Obviously she, acting as my deputy was unsure also.

18. Please explain if you were contacted by the Division of Elections in regards to the handwritten message on the Error Report previously submitted to the Division of Elections (marked by me as Attachment A); if so, by whom, when, and what information was relayed to you.

Always contacted by letter by Kristi Bronson with a error report but no explanation as (How) to fix anything.

I tried my best to do a good job, I shouldn't be punished for that because I didn't always understand how to report things.

19. Please explain if you were contacted by the Division of Elections in regards to the handwritten message on the Error Report previously submitted to the Division of Elections (marked by me as Attachment B); if so, by whom, when, and what information was relayed to you.

Same as above, Kristi Bronson with a copy of what I wrote that said nothing about how to fix anything

If it isn't done correctly at least tell us how to go about correcting it instead of just sending a letter. And just so you know your people aren't always knowledgeable on how to help fix things, I've run across that twice.

Exhibit 22(4 of 6)

20. Please explain why you accepted appointment as Laurel S. Bennett's 2016 campaign treasurer.

She asked me to. I was not aware that this was of a legal nature, I did not see any paperwork she submitted as to me being her treasurer. We were always in separate states when this campaign was going on. Lack of communication between us was a significant factor in this event.

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

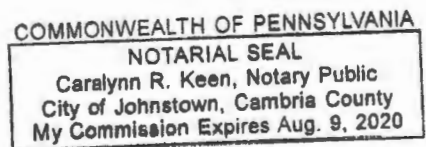
Lisa A. Davidson
Signature of Affiant

Print full name of Affiant on line below, as identified on I.D. card

Lisa A. Davidson

Sworn to (or affirmed) and subscribed before me this 22nd day of April, 2017.

Caralynn Keen
Signature of Notary Public - State of Pennsylvania
Print, Type, or Stamp Commissioned Name of Notary Public



Personally Known or Produced Identification
Type of Identification Produced: AA DL

Case Investigator: HH



Transaction history (continued)

| Date | Check Number | Description | Deposits/ Additions | Withdrawals/ Subtractions | Ending daily balance |
|-------------------------------|--------------|---|---------------------|---------------------------|----------------------|
| 6/6 | | Purchase authorized on 06/02 Jets Pizaa - Royal West Palm Bea FL 5586154751250771 Card 7490 | | 50.66 ✓ | |
| 6/6 | | Purchase authorized on 06/04 Walgreens 1601 S Congr Boynton Beach FL P00386156525733805 Card 7490 | | 85.49 ✓ | |
| 6/6 | | Purchase authorized on 06/04 Walgreens #5490 Boynton Beach FL S306156719592106 Card 7490 | | 34.96 ✓ | |
| 6/6 | | Purchase authorized on 06/06 Energy Mart Inc Boynton Beach FL P00000000246518349 Card 7490 | | 39.41 ✓ | 7,641.94 |
| 6/8 | | Purchase authorized on 06/07 Walgreens #5490 Boynton Beach FL 5586159495791559 Card 7490 | | 63.37 ✓ | |
| 6/8 | | Online Transfer Ref #lben92x6Dw to Platinum Card Xxxxxxxxxx4488 on 06/08/16 | | 854.40 ✓ | |
| 6/8 | | Online Transfer Ref #lbev35Ymbx to Personal Line of Credit xxxxxx7313 on 06/08/16 | | 183.00 ✓ | |
| 6/8 | | Purchase authorized on 06/08 Stein Mart 301 398 Nor Boynton Beach FL P00386160645365366 Card 7490 | | 82.61 ✓ | 6,458.56 |
| 6/9 | | Purchase authorized on 06/08 Rm *Laurel Bennett 866-9350302 AR S466160580667907 Card 7490 | | 100.00 ✓ | |
| 6/9 | | Purchase authorized on 06/09 Publix Super Mar 1180 Royal Palm Be FL P00306161597205099 Card 7490 | | 67.99 ✓ | 6,290.57 |
| 6/10 | | Purchase authorized on 06/10 Cvs/Pharmacy #03 03418 Royal Palm Be FL P00386162539401409 Card 7490 | | 33.47 ✓ | 6,257.10 |
| 6/13 | | Purchase authorized on 06/11 Jon Smith Subs Roy Royal Palm Be FL S466163645557231 Card 7490 | | 41.99 ✓ | |
| 6/13 | | Purchase authorized on 06/12 Cvs/Pharm 03418--1101 Royal Palm Be FL P00000000352624314 Card 7490 | | 40.19 ✓ | |
| 6/13 | | Purchase authorized on 06/13 Cvs/Pharmacy #03 03418 Royal Palm Be FL P00466165585169406 Card 7490 | | 33.41 ✓ | 6,141.51 |
| 6/14 | | Purchase authorized on 06/14 Murphy6841Atwalmrt Royal Palm Be FL P00586166655842955 Card 7490 | | 37.72 ✓ | |
| 6/14 | | Bill Pay Wu Pay on-Line No Account Number on 06-14 | | 962.00 ✓ | |
| 6/14 | | Bill Pay Wu Pay on-Line No Account Number on 06-14 | | 1,515.00 ✓ | 3,626.79 |
| 6/15 | | Purchase authorized on 06/13 Miller's Ale House Boynton Beach FL S306166066770962 Card 7490 | | 33.81 ✓ | |
| 6/15 | | Purchase authorized on 06/15 Jcpenney Store 2789 Wellington FL P00466167759965644 Card 7490 | | 22.00 ✓ | 3,570.98 |
| 6/16 | | Purchase authorized on 06/15 Publix Super Mar 133 N Boynton Beach FL P00586168058716788 Card 7490 | | 19.49 ✓ | |
| 6/16 | | Purchase authorized on 06/16 Publix Super Mar 133 N Boynton Beach FL P00466168800679099 Card 7490 | | 17.32 ✓ | 3,534.17 |
| 6/17 | 106 | Check | | 3,500.00 ✓ | 34.17 |
| 6/20 | 105 | Check | | 50.00 ✓ | -15.83 |
| 6/21 | | Overdraft Fee for a Transaction Posted on 06/20 \$50.00 Check # 00105 | | 35.00 ✓ | -50.83 |
| Ending balance on 6/22 | | | | | -50.83 |
| Totals | | | \$362.00 | \$11,941.29 | |

#15
↓

DCDM1DTGP 003599 NNNNNNNNN NNN NNN 002 003 287 020927 11577881.1.1

EXHIBIT 22 (6 of 6)



RE: Candidate Account # 64923

Bronson, Kristi R.

to:

Helen Hinson

06/14/2017 11:18 AM

Hide Details

From: "Bronson, Kristi R." <Kristi.Bronson@DOS.MyFlorida.com>

To: Helen Hinson <Helen.Hinson@myfloridalegal.com>

The errors were cash contributions, which should have been returned when the candidate was notified of the problem and then updated the report appropriately. The contributions were never returned and now that the campaign is over there is really nothing that can be amended.

This issues that remain are that 1) they accepted excessive cash contributions and failed to return them; and 2) failed to timely file an amendment or correction within the 7 days of receipt of the Division's letter.

Regards,

*Kristi Reid Bronson, Chief
Division of Elections,
Bureau of Election Records
(850) 245-6240*

This response is provided for reference only and does not constitute legal advice or representation. As applied to a particular set of facts or circumstances, interested parties should refer to the Florida Statutes and applicable case law, and/or consult a private attorney before drawing any legal conclusions or relying upon the information provided. Please note: Florida has a very broad public records law. Written communications to or from state officials regarding state business constitute public records and are available to the public and media upon request unless the information is subject to a specific statutory exemption. Therefore, your e-mail message may be subject to public disclosure.

From: Helen Hinson [<mailto:Helen.Hinson@myfloridalegal.com>]

Sent: Wednesday, June 14, 2017 10:49 AM

To: Bronson, Kristi R. <Kristi.Bronson@DOS.MyFlorida.com>

Subject: Candidate Account # 64923

Kristi Reid Bronson, Chief
Bureau of Election Records
Division of Elections
The R. A. Gray Building
Room 316; MS-23
500 S Bronough Street
Tallahassee, FL 32399-0250

RE: Laurel S. Bennett, Candidate Account # 64923

Dear Ms. Bronson:

Please let me know if her 2016 M5 Report (cover period of May 1 through 31, 2016) was amended and/or an explanation was provided to your satisfaction. If not, please identify any remaining issues with her 2016 M5 Report.

Thank you in advance for your assistance in resolving this matter.

23(1 of 2)

Helen Hinson
Investigation Specialist
Florida Elections Commission
The Collins Building, Ste. 224
107 West Gaines Street
Tallahassee, FL 32399-1050
helen.hinson@myfloridalegal.com
PH: 850.922.4539, extension 115
FAX: 850.921.0783
www.fec.state.fl.us

Please note: Florida has a very broad public records law. Written communications to or from me regarding state business constitute public records and are available to the public and media upon request **unless** the information is subject to a specific statutory exemption. Therefore, your e-mail message may be subject to public disclosure.

The Department of State is committed to excellence.
Please take our [Customer Satisfaction Survey](#).

23(2 of 2)

✓
HH

RECEIVED

To: Amy McKeever Tomala
Executive Director

2017 MAR 20 A 10:47

STATE OF FLORIDA
ELECTIONS-COMMISSION

RE: FEC-16-756.

Dear Amy,

I am late filing my response I was ill the entire month of February.

If you need proof here is my doctors name and phone number: Dr. Vijay Malhotra
814-535-2321

Thank you,

Lisa Baldwin

State of Pennsylvania, County of Cambria

My current legal name is Lisa Davidson, and my current occupation is Unemployed. I am presently 58 years old, and my current address of residence is 219 Sauers Avenue, Johnstown, Pennsylvania 15906.

Probable Cause Statement Case FEC -16-756

I am not relaying false statements. I fully acknowledge that false statements are punishable by law, the facts in this statement are true to the best of my knowledge. The relevant facts supporting a probable cause determination are as follows:

On 9/17/15 when the candidate Laurel Bennett appointed me as treasurer I had not seen the paperwork she submitted so I was not aware it was legally binding. She spent her time in Florida campaigning as I was in her home in Georgia as caregiver for her terminally ill husband. She was in possession of the checkbook at all times and the receipts needed to input the reports, so as you can see she was my deputy treasurer, we both had input as to the contents of the reports. She would email me what paperwork she had for each report but not always in a timely manner. The candidate did all the banking since she was in Florida, I would see statements occasionally. You will need to get the candidate involved in this matter as she was my deputy treasurer.

On 8/15/16 for the M5 report the alleged cash contributions you are talking about were donations to a campaign website, it was not actual cash money given to her. I put them in as cash contributions because I didn't know how to put them in otherwise, I thought I was doing the correct thing. Tallahassee contacted me and said I could not do that so I spoke to the candidate and she said change them to checks so I thought it would be better so I did. Then Tallahassee contacted me again and said I couldn't do that either that I had to put them in as refunds so I did, at this point I was very confused as to what I was doing. I again spoke to the candidate and told her of the situation that since she had possession of the checkbook she needed to refund the money and she said No because it was not actual cash money and since they were contributions to the website there was

nothing to refund, I believed her since I had not seen any documentation or had access to the checkbook since she was in another state.

I hereby state that the information above is true, to the best of my knowledge. I also confirm that the information here is both accurate and complete, and relevant information has not been omitted.

Signature of Individual

Lisa Davidson.

Date 3/2/17

Caralynn Keen

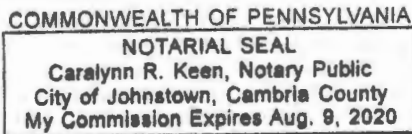
Notary Public

Notary Public State of Pennsylvania

Title And Rank

8/9/2020

Date Of Commission Expiry





RECEIVED

FLORIDA ELECTIONS COMMISSION

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

2017 MAR 20 10:47

STATE OF FLORIDA
ELECTIONS COMMISSION

February 16, 2017

Lisa Davidson
219 Sauers Avenue
Johnstown, PA 15906

RE: Case No.: FEC 16-756; Respondent: Lisa Davidson

Dear Ms. Davidson:

On December 7, 2016, the Florida Elections Commission received a complaint alleging that you violated Florida's election laws. I have reviewed the complaint and find that it contains one or more legally sufficient allegations. The Commission staff will investigate the following alleged violations:

Section 106.07(2)(b)1., Florida Statutes: Respondent, treasurer for Laurel Bennett, a 2016 candidate for the office of State Representative, failed to timely make necessary amendments to the campaign's 2016 M5 treasurer's report, as alleged in the complaint.

Section 106.09(1)(b), Florida Statutes: Respondent, treasurer for Laurel Bennett, a 2016 candidate for the office of State Representative, accepted one or more cash contributions in excess of the \$50 per campaign limit, as alleged in the complaint.

You may respond to the allegations above by filing a notarized statement providing any information regarding the facts and circumstances surrounding the allegations. 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.

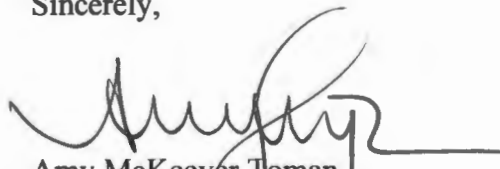
At any time before a probable cause finding, you may notify us in writing that you want to enter into negotiations directed towards reaching a settlement via consent agreement.

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 **Helen Hinson**, the investigator assigned to this case.

Sincerely,



Amy McKeever Toman
Executive Director

AMT/enr

**DIVISION OF ELECTIONS
FEC NOTICE FORM**

RECEIVED

2016 DEC -7 P 3:48

To FEC from Division of Elections

STATE OF FLORIDA

Name: Laurel S. Bennett
Account Number: 64923
Candidate: Laurel S. Bennett
Treasurer: Lisa Davidson
Person Named/Notified: Lisa Davidson and Laurel S. Bennett

The Division of Elections hereby provides this notice to the Florida Elections Commission pursuant to sections 106.22(7) and 106.25, Florida Statutes. Apparent violations of Chapter 106, F.S., have occurred based upon:

1. A failure to file addendums after notice as required by section 106.07(2)(b)1., Florida Statutes, for the 2016 M5 report; and
2. Accepting aggregate cash contributions in excess of \$50.00 per election as prohibited by section 106.09, Florida Statutes. (See attached Cash Contribution Report.)

Sent By: Kristi Reid Bronson
Date: December 6, 2016

KRB

ejr

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.
2. This affidavit is made upon my personal knowledge, including information obtained from review of the attached records, of which I am the custodian.
3. I am of legal age and competent to testify to the matters stated herein.
4. Laurel S. Bennett (64923) is a 2016 candidate for the office of State Representative.
5. On September 17, 2015, Ms. Bennett filed the Appointment of Campaign Treasurer and Designation of Campaign Depository with the Division. She appointed Lisa Davidson as treasurer. (See attached documents and acknowledgment letter.)
6. On July 28, 2016, the Division mailed Ms. Davidson notification that the 2016 M5 campaign treasurer's report was incomplete. (See attached letter.)
7. On August 15, 2016, the Division mailed Ms. Davidson notification that the 2016 M5 campaign treasurer's report was incomplete. The excessive cash contributions had not been reported refunded to the contributors. (See attached letter.)
8. On September 20, 2016, the Division mailed Ms. Davidson final notification with delivery confirmation that the 2016 M5 campaign treasurer's report was incomplete. The excessive cash contributions had not been reported refunded to the contributors. (See attached letter and delivery confirmation.)

9. As of December 6, 2016, the 2016 M5 campaign treasurer's report remains incomplete. The excessive cash contributions have not been reported refunded to the contributors.

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 December, 2016.


Signature of Notary Public - State of Florida

Print, Type, or Stamp Commissioned Name of Notary Public
Personally Known



**APPOINTMENT OF CAMPAIGN TREASURER
AND DESIGNATION OF CAMPAIGN
DEPOSITORY FOR CANDIDATES**
(Section 106.021(1), F.S.)

RECEIVED

15 SEP 17 AM 11:38

DIVISION OF ELECTIONS
SECRETARY OF STATE

(PLEASE PRINT OR TYPE)

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

OFFICE USE ONLY

1. CHECK APPROPRIATE BOX(ES):

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

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

Karrel S Bennett

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

*147 Regent Circle
Royal Palm Beach, FL 33411*

4. Telephone

(561) 379-5335

5. E-mail address

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

*House of Representatives
District 56*

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

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

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

Write-In No Party Affiliation *Republican* Party candidate.

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

10. Name of Treasurer or Deputy Treasurer

LISA DUNNISON

11. Mailing Address

1000 Crow ST

12. Telephone

(561) 744 2877

13. City

Jupiter

14. County

PBC

15. State

FL

16. Zip Code

33458

17. E-mail address

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

19. Name of Bank

Wells Fargo

20. Address

11707 Cheekwood Blvd

21. City

Royal Palm Beach

22. County

PBC

23. State

FL

24. Zip Code

33411

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

25. Date

11/15/2015

26. Signature of Candidate

X Karrel S Bennett

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

I, *Lisa Dunnison*, do hereby accept the appointment

(Please Print or Type Name)

designated above as: Campaign Treasurer Deputy Treasurer.

9/15/15
Date

X Lisa Dunnison
Signature of Campaign Treasurer or Deputy Treasurer

**STATEMENT OF
CANDIDATE**

(Section 106.023, F.S.)

(Please print or type)

OFFICE USE ONLY
RECEIVED

15 SEP 17 AM 11:38

DIVISION OF ELECTIONS
SECRETARY OF STATE

I, Lucas Booth

candidate for the office of House of Representatives District 86;

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

X Lucas Booth
Signature of Candidate

9/15/2015
Date

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



FLORIDA DEPARTMENT *of* STATE

RICK SCOTT
Governor

KEN DETZNER
Secretary of State

September 18, 2015

Ms. Laurel S. Bennett
147 Raycourt Circle
Royal Palm Beach, Florida 33411

Dear Ms. Bennett:

This will acknowledge receipt of the Appointment of Campaign Treasurer and Designation of Campaign Depository for the office of State Representative, which was placed on file in our office on September 17, 2015. Your name has been placed on the 2016 active candidate list.

Campaign Treasurer's Reports

Your first campaign treasurer's report will be due on **October 13, 2015**. The report will cover the period of September 1-30, 2015 (M9). All candidates who 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 your user identification number. The enclosed sealed envelope contains your initial password. Once you have logged in using the initial password, you will be immediately prompted to change it to a confidential sign-on. You, your 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: 64923



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.org



Laurel S. Bennett
September 18, 2015
Page Two

Pin Numbers

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

Each candidate is required to provide the Division of Elections with confidential personal information that may be used to allow access in the event this 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 filed must be completed and filed through the EFS not later than midnight 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 of the first business day the EFS becomes operable. No fine will be levied during the period the EFS was inoperable.

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

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 candidate and campaign treasurer and such persons are subject to the provisions of Section 106.07(5), Florida Statutes.

Laurel S. Bennett
September 18, 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: Chapters 104 and 106, Florida Statutes, *Candidate and Campaign Treasurer 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/js

Enclosures

pc: Lisa Davidson, Treasurer



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

July 28, 2016

Lisa Davidson, Treasurer for
Candidate Laurel S. Bennett
2806 Clearwater Terr SE
Conyers, GA 30013

Re: CAN 64923

Dear Ms. Davidson:

The Division of Elections has determined that one or more campaign reports are incomplete for the reasons noted in the attached error report.

Pursuant to Section 106.07(2), Florida Statutes, you have 7 days from receipt of this notice to file an amended report to correct errors or provide missing information. If the information has been reported accurately, provide a written explanation to the Division addressing the issue noted in the error report. Please be advised that failure to supply this information within the time allowed may constitute a violation of Chapter 106, Florida Statutes.

If you need assistance in filing an amendment, please contact the Division's help line 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

Attachment

cc: Laurel S. Bennett, Candidate

Error Report

Candidate: Laurel S. Bennett

Office: STR

Report: 2016 M5 (9) Covering Period: 5/1/16 - 5/31/16

Account: 64923

Contributions

| | | Contributor | | | | Contribution | | | | | |
|--|----------|-----------------|----------------------------|----------------------------|------|--------------------|------|----------|--------|---------|-------|
| Seq | Date | Name | Address | City/State/Zip | Type | Occupation | Type | Amount | InKind | Descrip | Amend |
| 7 | 05/28/16 | MATTHEWS JAMES | 1350 SW 26TH AVE | BOYNTON BEACH, FL 33426 | 3- | FACILITIES | CAS | \$100.00 | | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | | | |
| 4 | 05/08/16 | DAVIDSON LISA | 2806 CLEARWATER TERRACE SE | CONYERS GA 30013 | | RETIRED | CAS | \$100.00 | | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | | | |
| 3 | 05/12/16 | BALABAN BORIS | 147 ROYCOURT CIRCLE | ROYAL PALM BEACH, FL 33411 | 3- | TELECOMMUNICATIONS | CAS | \$500.00 | | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | | | |
| 1 | 05/13/16 | MATTEOLIA MATTY | 475 GREENWAY BLVD | ROYAL PALM BEACH, FL 33411 | 3- | MAYOR | CAS | \$100.00 | | | |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | | | |
| 8 | 05/23/16 | ELLIOTT NANCY | | OKLAHOMA CITY, OK | | AIRCRAFT MECHANIC | CAS | \$100.00 | | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | | | |
| *No Address Was Provided | | | | | | | | | | | |

Debitures

Transfers

Contributions



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

Second Notice

August 15, 2016

Lisa Davidson, Treasurer for
Candidate Laurel S. Bennett
2806 Clearwater Terr SE
Conyers, GA 30013

Re: CAN 64923

Dear Ms. Davidson:

On July 28, 2016, you were advised that one or more of your campaign treasurer's reports were incomplete and that you had 7 days to provide the requested information.

Our records indicate that changes to the report were made, however, the reports are still incomplete. Enclosed is a second error report. Please provide the requested information within 7 days of the date of this letter. Thank you for your cooperation.

Sincerely,

Kristi Reid Bronson, Chief
Bureau of Election Records

Attachment

cc: Laurel S. Bennett, Candidate

Florida Department of State - Division of Elections

Error Report

Candidate: Laurel S. Bennett

Office: STR

Election: 2016 M5 (9) Covering Period: 5/1/16 - 5/31/16

Account: 64923

003

Contributor

Contribution

| Date | Name | Address | City/State/Zip | Type | Occupation | Type | Amount | InKind Descrip | Amend |
|--|----------------|----------------------------|----------------------------|------|--------------------|------|----------|----------------|-------|
| 05/28/16 | MATTHEWS JAMES | 1350 SW 26TH AVE | BOYNTON BEACH, FL 33426 | 1 | FACILITIES | CAS | \$100.00 | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | |
| 05/08/16 | DAVIDSON LISA | 2806 CLEARWATER TERRACE SE | CONYERS GA 30013 | 1 | RETIRED | CAS | \$100.00 | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | |
| 05/12/16 | BALABAN BORIS | 147 ROYCOURT CIRCLE | ROYAL PALM BEACH, FL 33411 | 3 | TELECOMMUNICATIONS | CAS | \$500.00 | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | |
| 05/13/16 | MATTEOLA MATTY | 475 GREENWAY BLVD | ROYAL PALM BEACH FL 33411 | 3 | MAYOR | CAS | \$100.00 | | |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | |
| 05/23/16 | ELLIOTT NANCY | | OKLAHOMA CITY, OK | 1 | AIRCRAFT MECHANIC | CAS | \$100.00 | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | |
| *No Address Was Provided | | | | | | | | | |

003

003

Contributions

8/15/16

* Cash contributions changed to check, written explanation required.



FLORIDA DEPARTMENT OF STATE

Ken Detzner
Secretary of State

DIVISION OF ELECTIONS

FINAL NOTICE

Delivery Confirmation:

USPS TRACKING #
& CUSTOMER
RECEIPT

9114 9014 9645 0382 4752 06

For Tracking or inquiries go to USPS.com
or call 1-800-222-1811.

September 20, 2016

Lisa Davidson, Treasurer for
Candidate Laurel S. Bennett
2806 Clearwater Terr SE
Conyers, GA 30013

Re: CAN 64923

Dear Ms. Davidson:

You have previously been advised that one or more campaign treasurer's reports are incomplete for the reasons noted in the attached error report.

Pursuant to Section 106.07(2), Florida Statutes, you have 7 days from receipt of this letter to correct errors or provide missing information. If the information has been reported accurately, you must provide a written explanation to the Division addressing the issue noted in the error report. Please be advised that if you fail to comply with this request, the Division will forward this matter to the Florida Elections Commission for further action. Section 106.265(1), Florida Statutes, authorizes the Florida Elections Commission to impose civil penalties of up to \$1,000 per violation.

If you need assistance in filing an amendment, please contact the Division's help line at (850) 245-6280.

Sincerely,

Kristi Reid Bronson
Chief, Bureau of Election Records

Attachment

cc: Laurel S. Bennett, Candidate

Error Report

e: Laurel S. Bennett

Office: STR

t: 2016 M5 (9) Covering Period: 5/1/16 - 5/31/16

Account: 64923

| Contributor | | | | Contribution | | | | | |
|--|-----------------|----------------------------|----------------------------|--------------|--------------------|------|----------|----------------|-------|
| Date | Name | Address | City/State/Zip | Type | Occupation | Type | Amount | InKind Descrip | Amend |
| 05/28/16 | MATTHEWS JAMES | 1350 SW 26TH AVE | BOYNTON BEACH, FL 33426 | 1 | FACILITIES | CAS | \$100.00 | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | |
| 05/08/16 | DAVIDSON LISA | 2805 CLEARWATER TERRACE SE | CONYERS, GA 30013 | 1 | RETIRED | CAS | \$100.00 | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | |
| 05/12/16 | BALABAN BORIS | 147 ROYCOURT CIRCLE | ROYAL PALM BEACH, FL 34111 | 3 | TELECOMMUNICATIONS | CAS | \$500.00 | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | |
| 05/13/16 | MATTEOLIA MATTY | 475 GREENWAY BLVD | ROYAL PALM BEACH, FL 34111 | 3 | MAYOR | CAS | \$100.00 | | |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | |
| 05/23/16 | ELLIOTT NANCY | | OKLAHOMA CITY, OK | 1 | AIRCRAFT MECHANIC | CAS | \$100.00 | | ADD |
| *Cash Contributions May Not Exceed \$50 - Written Explanation Required | | | | | | | | | |
| *No Address Was Provided | | | | | | | | | |

* 9/20/16

Written Response received but needs to be signed, and need to show the refunds of the cash contributions over \$50.

8/15/16

* Cash contributions changed to check, written explanation required.

You told me I couldn't put them in as cash even though they were, so I put them in as checks. What was I

RECEIVED
16 AUG 26 AM 9:57
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SECRETARY OF STATE

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Updated Delivery Day: Thursday, September 22, 2016

Product & Tracking Information

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Features:
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| DATE & TIME | STATUS OF ITEM | LOCATION |
|-------------------------------|--------------------------|-------------------|
| September 22, 2016 , 12:23 pm | Delivered, In/At Mailbox | CONYERS, GA 30013 |

Your item was delivered in or at the mailbox at 12:23 pm on September 22, 2016 in CONYERS, GA 30013.

| | | |
|-------------------------------|--------------------------|------------------------|
| September 22, 2016 , 9:24 am | Out for Delivery | CONYERS, GA 30013 |
| September 22, 2016 , 9:14 am | Sorting Complete | CONYERS, GA 30013 |
| September 22, 2016 , 7:09 am | Arrived at Post Office | CONYERS, GA 30013 |
| September 21, 2016 , 12:59 pm | Arrived at USPS Facility | ATLANTA, GA 30369 |
| September 21, 2016 , 2:56 am | Arrived at USPS Facility | JACKSONVILLE, FL 32099 |
| September 20, 2016 , 11:11 pm | Departed USPS Facility | TALLAHASSEE, FL 32301 |
| September 20, 2016 , 8:47 pm | Arrived at USPS Facility | TALLAHASSEE, FL 32301 |

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Tracking (or receipt) number

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Track all your packages from a dashboard. No tracking numbers necessary.

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Account/Seq 64923 3

Election/Type

20161108-GEN

Laurel S. Bennett

CAN

| Status/Reviewer | Mailed | Type/Recd | R E S P O N S E | |
|-----------------|----------------|-----------|-----------------|-----------|
| HL zjsantos | 1st: 7/28/2016 | RSP | | |
| 9/20/16 8:56 am | 2nd: 8/15/2016 | 9/22/2016 | WRI | 8/26/2016 |
| | 3rd: 9/20/2016 | | WRI | 9/19/2016 |

NOTES: 11/1/16- Contribution refunds have not been shown. Referring to FEC. ejr
 10/21/16- Hold for 2016 G6 to show cash contributions. If not, do FEC referral. ejr
 10/18/16- Spoke with treasurer and we reported correctly the cash contributions; however, the refunds have not been sent out. I told Ms. Davidson that she needs to get a hold of the candidate, have Ms. Bennett write out refunds to the contributors for their large cash contributions and I'd assist Ms. Davidson in reporting those correctly on the next report. ejr
 10/17/16- Treasurer called back but had to leave a message. I will try to call her tomorrow. ejr
 10/17/16- Attempted to reach treasurer in order to make the corrections but had to leave a message. ejr
 9/19/2016 - Second written response received, but it is not signed - stb
 8/26/16 - Written response received, but it is not signed - slb

Cash and Loan Contributions

2016 - M5

12/5/2016 4:30:00 PM

Laurel S. Bennett

64923

Type: CAS

| Contributor | Date | Seq # | Amount |
|-------------------|----------------------|------------|-----------------|
| BALABAN - BORIS | 5/12/16 | 3 | \$50.00 |
| | 5/20/16 | 6 | \$25.00 |
| DAVIDSON - LISA | 5/8/16 | 4 | \$50.00 |
| | 5/8/16 | 12 | \$100.00 |
| ELLIOTT - NANCY | 5/23/16 | 8 | \$50.00 |
| | 5/23/16 | 11 | \$100.00 |
| HARTZHEIM - NOAH | 7/21/16 | 1 | \$25.00 |
| LISA - DAVIDSON | 6/21/16 | 2 | \$20.00 |
| MATTEOLA - MATTY | 5/13/16 | 13 | \$100.00 |
| MATTEOLIA - MATTY | 5/13/16 | 1 | \$50.00 |
| MATTHEWS - JAMES | 5/28/16 | 10 | \$50.00 |
| | 5/28/16 | 7 | \$100.00 |
| NEGRON - VICTOR | 6/21/16 | 6 | \$50.00 |
| PETRITIS - LAURIE | 5/27/16 | 5 | \$50.00 |
| PRUDENTE - PAULA | 5/19/16 | 2 | \$20.00 |
| | <u>TOTAL:</u> | CAS | \$840.00 |

Type: LOA

| Contributor | Date | Seq # | Amount |
|------------------|----------------------|------------|----------------|
| BENNETT - LAUREL | 9/18/15 | 1 | \$50.00 |
| | <u>TOTAL:</u> | LOA | \$50.00 |