STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

In Re:	Citizens First		Case No.:	FEC 16-676
		1		

TO: Emmett Mitchell, IV, Esquire Coates Law Firm PL 115 East Park Avenue, Ste. 1 Tallahassee, FL 32301

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

NOTICE OF HEARING (AUTOMATIC FINE)

A hearing will be held in this case before the Florida Elections Commission on, **February 28, 2017 at 11:00 am,** or as soon thereafter as the parties can be heard, at the following location: **Senate Office Building, 404 South Monroe Street, Room 110-S, Tallahassee, Florida 32399**

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

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

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

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

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

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

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

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

See further instructions on the reverse side.

Amy McKeever Toman

Executive Director Florida Elections Commission February 13, 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.

FLORIDA ELECTIONS COMMISSION CASE REPORT

Case Number: FEC-16-676

CANDIDATE []

POLITICAL PARTY []

PC [X] CCE []

ECO[]

STATE [X]

DISTRICT []

COUNTY []

CITY []

NAME: CITIZENS FIRST

DATE APPEAL RECEIVED: 10/14/16

DATE REPORT DUE: 7/29/16 (2016 P3)

DATE OF ELECTRONIC RECEIPT: 7/29/16¹

DATE FILING OFFICER RECEIVED REPORT: 7/29/16

NUMBER OF DAYS LATE: 0

AMOUNT OF FINE: \$1,150.00

FINE BASED ON: (X) NUMBER OF DAYS () 25% OF RECEIPTS () 25% OF EXPENDITURES

TOTAL RECEIPTS FOR REPORTING PERIOD: \$45,000.00

TOTAL EXPENDITURES FOR REPORTING PERIOD: \$0

DATE FIRST NOTIFICATION WAS SENT: 8/17/16

SUMMARY: Citizens First is a political committee (PC) registered with the State of Florida. The PC's chair and treasurer is Kathy Dolbow. This PC is currently represented by attorney, Bucky Mitchell.

The PC is appealing the fine claiming that unusual circumstances existed that caused the 2016 P3 Report to be untimely filed. According to Mr. Mitchell, 'Citizens First (CF) actually filed a waiver notice on July 29, 2016, believing it had no activity for the period, 7/16/16-7/22/16. However, CF later determined that it had limited activity during the weekly reporting period in question. The activity included two contributions received by the committee, but no expenditures. Accordingly, CF "amended" the waiver notice on August 3, 2016, just five days after the due date, to show receipt of the two contribution... There was no intention by CF to hide its activity, and when considering its options, believed the best course of action was to report the activity in the proper reporting period".

- The 2016 P3 Report covers the time period from 7/16/16 through 7/22/16.
- The 2016 P3 Queued-Transactions Report reflects that this report was created on 7/26/16 at approximately 1:19 pm, before being filed on 7/29/16 at approximately 11:50 am.²
- In a 1/25/17 email with Kristi Reid-Bronson, FEC staff was informed, "The committee filed a notice of no activity (waiver) on 7/29/16. A waiver is not a report. On 8/3/16, the committee filed a report showing \$20,000 of activity. The fine is based on filing the report 5 days late".

****The committee amended again on 9/9/16 and added an additional \$25,000 of activity****

PRIOR CASES: This PC has been involved in three FEC investigations. FEC 16-599/automatic fine default rejected. #11-223, the automatic fine was waived by the Commission due to finding unusual circumstances during appeal. #16-677; automatic fine appeal will also be heard during the February Commission meeting.

Respondent initially filed a waiver that reflected no activity occurred during the 2016 P3 reporting period. Respondent later filed a 2016 P3 Report to reflect financial activity.

² The report discussed in this bullet refers to the waiver that reflected zero activity.



RICHARD E. COATES
EMMETT MITCHELL, IV
ROGER N. BEAUBIEN

115 East Park Avenue, Suite 1 Tallahassee, Florida 32301 (850) 681-1029 Fax: (208) 248-9038

VIA HAND DELIVERY

October 14, 2016

Amy Toman Florida Elections Commission 107 West Gaines Street The Collins Building, Suite 224 Tallahassee, Florida 32399-1050

RE: Autofine, Citizens First, PAC 69296

Dear Ms. Toman:

This firm represents Citizens First (CF), a political committee recently registered with the Division of Elections (Division). CF received a letter from the Division assessing a late fine against it for not filing a campaign treasurer's report (P3) that was due on July 29, 2016. See attached. CF hereby appeals the late fine of \$1,150.00 assessed by the Division.

The circumstances for this weekly report are as follows. CF actually filed a <u>waiver</u> <u>notice</u> on July 29, 2016, believing it had no activity for the period, 7/16/16-7/22/16. However, CF later determined that it had limited activity during the weekly reporting period in question. The activity included two contributions received by the committee, but no expenditures.

Accordingly, CF "amended" the waiver notice on August 3, 2016, just five days after the due date, to show receipt of the two contributions. *See Filed Report Receipt attached*. There was no intention by CF to hide its activity, and when considering its options, believed the best course of action was to report the activity in the proper reporting period.

Given that political committees are currently required to report their activity on a weekly basis, it is very easy to accumulate a substantial fine for an inadvertently filed "late report" or amendment. It can also be somewhat challenging to timely report a political committee's activity when it is created in the middle of a weekly reporting period.



CF filed its *Statement of Organization* on July 7, 2016. CF received its logon credentials for the Division's EFS sometime after July 13, notifying CF that it would have a report due on July 22, 2016. In this case, CF would have been better off simply reporting the two contributions in the next reporting period and timely filing that next report. There would have been no "auto-fine" letter or assessment generated.

The assessment of a late fine in this case seems totally contrary to chapter 106's "who gave it, who got it" intent, and only serves to discourage filers to do the right thing, that is to amend a report (or a waiver notice) so that it is accurate. The Division is also sending the message that imperfection will not be tolerated and that a filer will be punished if it amends a report to provide accurate information.

Thank you for your consideration of this appeal.

Sincerely,

Bucky Mitchell

cc: Division of Elections

(Suly Mitel

RECEIVEL CITIZENS FIRST 6671 W. INDIANTOWN RD. SUITE 50 1 -7 AM 10: 29 JUPITER, FL 33458

UTVISION OF ELECTIONS

29 August 2016

Kristi Reid Bronson Florida Department of State **Division of Elections** 500 S. Bronough St. Suite 316 Tallahassee, FL 32399

RE: Campaign Treasurers Report, P3

Dear Ms. Bronson,

In response to your letter dated August 17, 2016 regarding our late filing of the P3 campaign report. After researching this issue, I have found the P3 report was filed on the due date, July 29, at 11:50 am, as a waiver. Our amended P3 report was later entered and filed on August 3rd.

I have included copies of the initial filing, the amendment, and a copy of the filed reports table from Campaign Finance Online, Division of Elections that confirms the P3 was filed on 29 July.

I look forward to hearing from you confirming the above file dates are accurate along with your authorization to cancel the \$1,150.00 fine.

Thank you,

Kathy Dolbow

Kathy Dolbow

Chairperson

Filed Report Receipt

** Report has been Filed **

ID: 69296

Name: Citizens First

Report: 2016 - P3 - 2

Election: 2016 General Election Covers: 7/16/2016-7/22/2016

Due: 7/29/2016

(Filed: 7/29/2016 11:50:35 AM)

Reviewed: 7/26/2016

2016 SEP -7 AM 10: 30

Print Date: 7/29/2016 11:50:35 AM

Waiver

Amended

1.1

File Status: Submitted Report for Filing

Review Status: Reviewed

Detail Complete: No Detail Records Found

File Method: Web Filed

Entry Method: Web Data Entry

Pending Queued Items: 0

Number of Detail Records

Contributions: 0

0 Expenditures:

Fund Transfers:

0 Distributions:

To Print: Right Click Mouse and Select 'Print'

Go to Filed Report List

Filed Report Receipt

** Report has been Filed **

ID: **69296**

Name: Citizens First

Report: 2016 - P3 - 2

Election: 2016 General Election

Covers: 7/16/2016-7/22/2016

Due: 7/29/2016

Print Date: 8/3/2016 3:28:04 PM

✓ Waiver

Amended

Filed: 8/3/2016 3:28:04 PM

File Status: Submitted Report for Filing

Reviewed: 8/3/2016

Review Status: Reviewed

Detail Complete: Complete Detail Records

File Method: Web Filed

Pending Queued Items: 0

Entry Method: Web Data Entry

Number of Detail Records

Contributions:

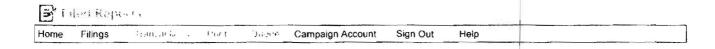
Expenditures:

Fund Transfers: 0

Distributions:

To Print: Right Click Mouse and Select 'Print'

Go to Filed Report List



The table below lists all campaign finance treasurer reports that have been *Filed* with the Department of State, Division of Elireports may not be edited, but may be amended.

Select a report by clicking on the Sequence Number.

· .	R-pert Year	Fection ID	Poport Type	Date Filer	Complete Status	Amended	Hens I Queur
5	2016	20161108-GEN	P7	08/26/2016	Incomplete Detail Records	N	
	2016	20161108-GEN	. P6	08/19/2016	Complete Detail Records	N	
	2016	20161108-GEN	P5	08/12/2016	No Detail Records Found	N	
	2016	20161108-GEN	P4	08/05/2016	Complete Detail Records	N	
	2016	20161108-GEN	P3	07/29/2016	Complete Detail Records	Y	
	2016	20161108-GEN	P2A	07/22/2016	Incomplete Detail Records	N	

Go To Multiple Uniform Contribution Reports

Florida Department of State, Division of Elections 2005



FLORIDA DEPARTMENT OF STATE

Ken Detzner

Secretary of State

DIVISION OF ELECTIONS

Final Notice

Delivery Confirmation:

USPS TRACKING # & CUSTOMER

9114 9999 4423 8937 9438 32

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

September 23, 2016

Kathy Dolbow, Treasurer Citizens First 6671 West Indian Town Road, Suite 50-147 Jupiter, FL 33458-3458

PAC 69296

Dear Ms. Dolbow:

The campaign treasurer's report that was due on July 29, 2016, was filed on August 3, 2016. By law, you are automatically assessed a late fine of \$1,150.00.

You have 20 days from the receipt of this notice to either:

1. Pay the fine to the Florida Division of Elections (For a candidate only, a fine is not an allowable campaign expenditure and must be paid from personal funds) at:

Florida Division of Elections R.A. Gray Building, Room. 316 500 South Bronough Street Tallahassee, Florida 32399-025011

2. Appeal the fine to the Florida Elections Commission (See Rules 2B-1.005 and 2B-1.0055, Florida Administrative Code) at:

Florida Elections Commission 107 West Gaines Street, Ste. 224 Tallahassee, Florida 32399-0150

If you appeal, please send a copy also to the Florida Division of Elections so that you will not receive further notices from the Division about this matter.

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

Sincerely.

Kristi Reid Bronson, Chief Bureau of Election Records



FLORIDA DEPARTMENT OF STATE

Ken Detzner

Secretary of State

DIVISION OF ELECTIONS

August 17, 2016

Kathy Dolbow, Treasurer Citizens First 6671 West Indian Town Road, Suite 50-147 Jupiter, FL 33458-3458

PAC 69296

Dear Ms. Dolbow:

The campaign treasurer's report that was due on July 29, 2016, was filed on August 3, 2016. By law, you are automatically assessed a late fine of \$1,150.00.

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If you appeal, please send a copy also to the Florida Division of Elections so that you will not receive further notices from the Division about this matter.

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

Sincerely,

Kristi Reid Bronson, Chief Bureau of Election Records

	T OF STATE, DIVISION OF E ASURER'S REPORT SUMM	
(1) Citizens First	(2) 69296	
Candidate, Committe or Party Name	I.D. Number	
(3) 6671 West Indian Town Road,	Jupiter	FL 33458
Address (number and street) Check box if address has changed since last report	City	State Zip Code
(4) Check appropriate box(es):		
 ☐ Candidate (office sought): ☒ Political Committee ☐ Committee of Continuous Existance ☐ Party Executive Committee 	☐ Check If PC has DISBAN☐ Check If CCE has DISBA	
(5) REPOR	RT IDENTIFIERS	
Cover Period: From 07/16/2016 To 07.	/22/2016 Report	уре: рз
☐ Original X Amendment ☐ Sp	ecial Election Report	
(6) CONTRIBUTIONS THIS REPORT	(7) EXPENDIT	URES THIS REPORT
Cash & Checks \$45,000.00	Monetary Expenditures	\$0.00
Loans \$0.00	Transfers to Office Account	\$0.00
Total Monetary \$45,000.00	Total Monetary	\$0.00
In-Kind \$0.00	(8) Other Distributions	
Ce It is a first degree misdemeanor for any p	ertification erson 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	I certify that I have examined true, correct and complete	this report and it is
Name of Treasurer Deputy Treasurer	Name of Candidate	X Chaiman (PC/PTY Only
*	X	
XSignature	Signature	
Prepared on: 1/19/17 11:41:51AM		Reviewed On: 11/28/16 11:53 am

CAMPAIGN T. ASURER'S REPORT - ITEMIZED CONT. JUTIONS

Page 1 of 1

Name: Ci

Citizens First

Report: 2016 P3

Period: 07/16/2016

to 07/22/2016

	-	* Records in File	ed Report **	
Seq #	Full Name (Last, Suffix, First, Middle Street Address & City, State, Zip	Contributor Type	Occupation In-Kind Description	Amount
1	MG3 DEVELOPER GROUP LLC 1915 HARRISON ST	В	DEVELOPER	\$20,000.00
07/22/2016	HOLLYWOOD, FL 33020	CHE		UPD
_1	MG3 DEVELOPER GROUP LLC 1915 HARRISON ST	В	DEVELOPER	\$20,000.00
07/22/2016	HOLLYWOOD, FL 33020	CHE		UPD History 11/28/16
1	MG3 DEVELOPER GROUP LLC 1915 HARRISON ST	В	DEVELOPER	\$20,000.00
07/22/2016	HOLLYWOOD, FL 33020	CHE		ADD History 09/09/16
2	THE CONSERVATIVE 115 EAST PARK AVE	F	COMMITTEE	\$25,000.00
07/19/2016	TALLAHASSEE, FL 32301	CHE		UPD
* 2	THE CONSERVATIVE 115 EAST PARK AVE	F	COMMITTEE	\$25,000.00
07/19/2016	TALLAHASSEE, FL 32301	CAS		ADD History 11/28/16

CAMPAIGN 1. LASURER'S REPORT - ITEMIZED EXPENDITURES

Page 1 of 1

Name: Citizens First

Report: 2016 P3

Period: 07/16/2016

to 07/22/2016

** Records in Filed Report **

Seq #	Full Name (Last, Suffix, First, Middle Street Address & City, State, Zip	Туре	Purpose	Amount

CAMPAIGN T. LASURER'S REPORT - ITEMIZED DISTRIBUTIONS

Page 1 of 1

Name:

Citizens First

Report: 2016 P3

Period: 07/16/2016

to 07/22/2016

** Records in Filed Report **

Seq#	Full Name (Last, Suffix, First, Middle	Recipient	Purpose	Amount
Date	Street Address & City, State, Zip	Туре	Related Expenditure	Amend
10				

CAMPAIGN TR. ASURER'S REPORT - ITEMIZED FUND 1 ANSFERS

Page 1 of 1

Name:

Citizens First

Report: 2016 P3

Period: 07/16/2016

to 07/22/2016

** Records in Filed Report **

		THE STATE OF THE S	The state of the s	
Seq#	Full Name (Last, Suffix, First, Middle			Amount
Date	Street Address & City, State, Zip	Туре	Nature of Account	Amend

Queued Items for 2016-P3

Account: 69296

Citizens First

Rpt Seq: 2

ProcessDescription	Status	Submitter	Created	LastUpdate
Create Pending Report	Processing Complete	69296	7/26/2016 1:19:07 PM	7/26/2016 1:19:07 PM
Review Pending Report	Processing Complete	69296	7/26/2016 1:19:12 PM	7/26/2016 1:19:12 PM
File Pending Report	Processing Complete	69296	7/29/2016 11:50:36 AM	7/29/2016 11:50:36 AM
Amend Filed Report	Processing Complete	69296	8/3/2016 3:24:56 PM	8/3/2016 3:24:56 PM
Recalc Pending Report Total	Processing Complete	69296	8/3/2016 3:26:58 PM	8/3/2016 3:26:58 PM
Review Pending Report	Processing Complete	69296	8/3/2016 3:27:07 PM	8/3/2016 3:27:07 PM
Review Pending Report	Processing Complete	69296	8/3/2016 3:27:40 PM	8/3/2016 3:27:40 PM
File Pending Report	Processing Complete	69296	8/3/2016 3:28:05 PM	8/3/2016 3:28:05 PM
Amend Filed Report	Processing Complete	69296	9/9/2016 4:46:17 PM	9/9/2016 4:46:17 PM
Review Pending Report	Processing Complete	69296	9/9/2016 4:56:39 PM	9/9/2016 4:56:39 PM
File Pending Report	Processing Complete	69296	9/9/2016 4:57:47 PM	9/9/2016 4:57:47 PM
Review Filed Report	Processing Complete	njtaylor	11/2/2016 3:25:34 PM	11/2/2016 3:25:34 PM
Amend Filed Report	Processing Complete	69296	11/28/2016 11:49:48 AM	11/28/2016 11:49:48 AM
Review Pending Report	Processing Complete	69296	11/28/2016 11:53:56 AM	11/28/2016 11:53:56 AM
File Pending Report	Processing Complete	69296	11/28/2016 11:54:23 AM	11/28/2016 11:54:23 AM



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Florida Department of State - Division of Elections

Florida Election System Reports

TOTTUO	Liection System Rep	ULIS								
C	Sandidate/Committee Lookup	Committe	e Na	ıme: Citizens	First					
Name			Acco	unt: 69296						
Election		Date Due	Туре	Date Filed	Status	Days Late	Fine Assessed	Appealed	Amount Fined	Amount Paid
		1/10/2017	M12	1/10/2017		Late	7133433464		Tilled	, ara
Acct.	69296	12/12/2016								
Type	Committee	11/4/2016	D6	11/3/2016						
		11/4/2016	G7	11/4/2016						
	Search Reset	11/2/2016	D5	11/2/2016						
		11/1/2016	D4	11/1/2016						
		10/31/2016	D3	10/31/2016						
		10/30/2016	D2	10/30/2016						
		10/29/2016	D1	10/28/2016						
		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	10/5/2016						
		9/30/2016	G2A	9/30/2016						
		9/23/2016	G2	9/23/2016						
		9/16/2016	G1A	9/16/2016						
		9/9/2016	G1	9/9/2016						
		9/2/2016	P7A	9/2/2016						
		8/26/2016	P7	8/26/2016						
		8/19/2016	P6	8/19/2016						
		8/12/2016	P5	8/12/2016	FEC	0	\$12,650.00)	\$12,650.00	\$0.00
		8/5/2016	P4	8/5/2016						
		7/29/2016	P3	7/29/2016	FEC	Ο	\$1 150 00)	\$1 150 00	\$0.00

7/22/2016 P2A 7/22/2016



Citizens First

Campaign Finance Activity

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

		C	ontributions				
	Filing Period	Monetary	Loans	InKind	Expend	Other	Transfers
0	07/09/2016 - 07/15/2016	329,466.10	0.00	0.00	135,000.00	0.00	0.00
0	07/16/2016 - 07/22/2016	45,000.00	0.00	0.00	0.00	0.00	0.00
0	07/23/2016 - 07/29/2016	5,000.00	0.00	0.00	70,020.00	0.00	0.00
0	07/30/2016 - 08/05/2016	0.00	0.00	0.00	70,025.00	0.00	0.00
0	08/06/2016 - 08/12/2016	19,000.00	0.00	0.00	21,440.00	0.00	0.00
0	08/13/2016 - 08/25/2016	109,100.00	0.00	0.00	50,115.00	0.00	0.00
W	08/26/2016 - 08/26/2016	0.00	0.00	0.00	0.00	0.00	0.00
0	08/27/2016 - 09/02/2016	0.00	0.00	0.00	138,821.19	0.00	0.00
W	09/03/2016 - 09/09/2016	0.00	0.00	0.00	0.00	0.00	0.00
0	09/10/2016 - 09/16/2016	130,000.00	0.00	0.00	8,353.70	0.00	0.00
W	09/17/2016 - 09/23/2016	0.00	0.00	0.00	0.00	0.00	0.00
0	09/24/2016 - 09/30/2016	3,000.00	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
0	10/08/2016 - 10/14/2016	40,000.00	0.00	0.00	0.00	0.00	0.00
0	10/15/2016 - 10/21/2016	48,000.00	0.00	0.00	50,045.00	0.00	0.00
0	10/22/2016 - 10/28/2016	25,500.00	0.00	0.00	130,000.00	0.00	0.00
W	10/29/2016 - 10/29/2016	0.00	0.00	0.00	0.00	0.00	0.00
W	10/30/2016 - 10/30/2016	0.00	0.00	0.00	0.00	0.00	0.00
0	10/31/2016 - 10/31/2016	30,000.00	0.00	0.00	0.00	0.00	0.00
W	11/01/2016 - 11/01/2016	0.00	0.00	0.00	0.00	0.00	0.00
0	11/02/2016 - 11/02/2016	30,000.00	0.00	0.00	0.00	0.00	0.00
0	10/22/2016 - 11/03/2016	3,000.00	0.00	0.00	0 00	0.00	0.00

0	11/04/2016 - 11/30/2016	0.00	0.00	0.00	14,268.75	0.00	0.00
0	12/01/2016 - 12/31/2016	0.00	0.00	0.00	30,025.00	0.00	0.00
•	All Dates (Totals)	817,066.10	0.00	0.00	718,113.64	0.00	0.00

Note: (E) indicates that report was filed electronically

X Indicates that detail has not been released

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



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



RE: Acct #69296 Bronson, Kristi R.

to:

Cedric Oliver 01/25/2017 12:33 PM

Hide Details

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

To: Cedric Oliver < Cedric.Oliver@myfloridalegal.com>

The committee filed a notice of no activity (waiver) on 7-29-16. A waiver is not a report. On 8-3-16, the committee filed a report showing \$20,000 of activity. The fine is based on filing the report 5 days late. By the way, the committee amended again on 9-9-16 and added an addition \$25,000 of activity.

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: Cedric Oliver [mailto:Cedric.Oliver@myfloridalegal.com]

Sent: Thursday, January 19, 2017 12:12 PM

To: Bronson, Kristi R. Subject: Acct #69296

Kristi, Could you please explain the discrepancy for this PC's 2016 P3 Report. DO∉ records reflect that this report was filed on 7/29/16, which is the day that the report was due. This PC was fined \$1,150.00.

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