

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**In Re: Raquel Regalado**

---

**Case No.: FEC 15-372**

**TO:** Roland Sanchez-Medina, Jr., Esquire  
SM & GQ Attorneys at Law  
201 Alhambra Circle, Suite 1205  
Coral Gables, FL 33134-5107

Elliot S. Berke, Esquire  
Berke Farah LLP  
1200 New Hampshire Avenue NW, Suite 800  
Washington, DC 20036

**NOTICE OF HEARING (INFORMAL HEARING)**

A hearing will be held in this case before the Florida Elections Commission on, **November 16, 2016 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  
November 1, 2016

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

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

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

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

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

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

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

FILED

16 AUG 31 PM 1:10

STATE OF FLORIDA  
ELECTIONS COMMISSION

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**Florida Elections Commission,  
Petitioner,**

**Case No.: FEC 15-372**

**v.**

**Raquel A. Regalado,  
Respondent.**

**ORDER OF PROBABLE CAUSE**

**THIS MATTER** was heard by the Florida Elections Commission (Commission) at its regularly scheduled meeting on August 17, 2016, in Tallahassee, Florida.

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

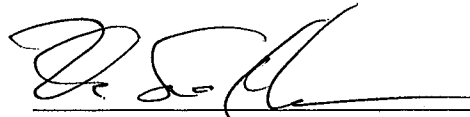
**Count 1:**

On March 10, 2015, Raquel A. Regalado violated Section 106.19(1)(a), Florida Statutes, when she accepted a contribution in excess of the limits prescribed by Section 106.08, Florida Statutes.

**Count 2:**

On March 10, 2015, Raquel A. Regalado violated Section 106.19(1)(a), Florida Statutes, when she accepted a contribution in excess of the limits prescribed by Section 106.08, Florida Statutes.

**DONE AND ORDERED** by the Florida Elections Commission on August 17, 2016.



M. Scott Thomas, Chairman  
Florida Elections Commission

Copies furnished to:  
Stephanie J. Cunningham, Assistant General Counsel  
Roland Sanchez-Medina, Jr., Attorney for Respondent  
Elliot S. Berke, Attorney for Complainant

### NOTICE OF RIGHT TO A HEARING


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

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

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

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

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

Re: RR: FEC 15-372   
Stephanie Cunningham to: Roland

07/29/2016 05:02 PM

From: Stephanie Cunningham/OAG  
To: Roland@smgqlaw.com

Roland:

If you can provide a response by 8 a.m. on August 4th I will be able to include it in the materials that are sent to the Commissioners to review prior to the meeting. You can still submit a response prior to August 16th but it would be at the discretion of the Commission to review it during the meeting. The Commissioners have paused to read newly submitted documents during a meeting but that is not always the case.

You may also file a motion to continue with our office stating the specific reasons for the continuance. The motion would be presented at the August meeting and if granted, a hearing would be scheduled in November.

Stephanie J. Cunningham  
Assistant General Counsel  
Florida Elections Commission  
107 W. Gaines Street  
Collins Building, Suite 224  
Tallahassee, FL 32399-1050  
stephanie.cunningham@myfloridalegal.com  
(850) 922-4539  
(850) 921-0783 fax  
www.fec.state.fl.us

Roland Sanchez-Medina Jr. Please call me Roland. Thank you ver... 07/25/2016 10:03:14 AM

From: Roland Sanchez-Medina Jr. <Roland@smgqlaw.com>  
To: Stephanie Cunningham <Stephanie.Cunningham@myfloridalegal.com>  
Date: 07/25/2016 10:03 AM  
Subject: RR: FEC 15-372

Please call me Roland. Thank you very much.

Roland

ROLAND SANCHEZ-MEDINA JR, ESQ.



201 Alhambra Circle | Suite 1205 | Coral Gables, Florida 33134-5107  
Office: 305.377.1000 Ext. 108 | Direct Fax: 855.898.0454 | Toll Free: 855.213.4806  
[roland@smgqlaw.com](mailto:roland@smgqlaw.com) | [SMGQLAW.com](http://SMGQLAW.com) | Attorney Bio

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CIRCULAR 230 NOTICE: To comply with U.S. Treasury Department and IRS regulations, we are required to advise you that, unless expressly stated used, and cannot be used, by any person for the purpose of (i) avoiding penalties under the U.S. Internal Revenue Code, or (ii) promoting, marketing

**From:** Stephanie Cunningham [mailto:Stephanie.Cunningham@myfloridalegal.com]  
**Sent:** Monday, July 25, 2016 10:01 AM  
**To:** Roland Sanchez-Medina Jr.  
**Subject:** Re: RR: FEC 15-372

Mr. Sanchez-Medina:

The Commission meets quarterly so if the case is not heard in August it would be pushed back to November. I do not decide which cases appear on the agenda but as a matter of course, once a staff recommendation is issued that case is typically set for the next available meeting. The initial hearing is to determine if there is probable cause to go forward. There will be additional opportunities to submit information to the Commission if probable cause is found. However, I will still inquire as to whether we can accept your response after the deadline in light of your situation and will email you later this week.

Stephanie J. Cunningham  
Assistant General Counsel  
Florida Elections Commission  
107 W. Gaines Street  
Collins Building, Suite 224  
Tallahassee, FL 32399-1050  
[stephanie.cunningham@myfloridalegal.com](mailto:stephanie.cunningham@myfloridalegal.com)  
(850) 922-4539  
(850) 921-0783 fax  
[www.fec.state.fl.us](http://www.fec.state.fl.us)

Rolland Sanchez-Medina Jr. ---07/24/2016 04:35:55 PM---Ms. Cunningham, I understand your scheduling and I'm not trying to be argumentative, but I see it as

From: Roland Sanchez-Medina Jr. <[Roland@smggglaw.com](mailto:Roland@smggglaw.com)>  
To: Stephanie Cunningham <[Stephanie.Cunningham@myfloridalegal.com](mailto:Stephanie.Cunningham@myfloridalegal.com)>  
Cc: Donna Malphurs <[Donna.Malphurs@myfloridalegal.com](mailto:Donna.Malphurs@myfloridalegal.com)>  
Date: 07/24/2016 04:35 PM  
Subject: RR: FEC 15-372

Ms. Cunningham,

I understand your scheduling and I'm not trying to be argumentative, but I see it as an issue of proper due process and simple fairness while you are responding to me with the proposed schedule. Your correspondence was received by my office on July 19, 2016 leaving one week to file a response. As it so happens, I am on vacation with my family this week, vacation that had been planned months ago. I will not be able to provide additional information, information that would be helpful to our position.

It is unclear to me why it's not in the best interest of the FEC to have all of the information it needs in order to reach a just conclusion. What is the prejudice to the FEC by delaying the probable cause determination until the following month? Thank you for your consideration.

Roland

\*As an aside, in a world where everyone works via email, why would the FEC want to delay delivery of a letter that has time limitations?

ROLAND SANCHEZ-MEDINA JR, ESQ.



SMGQ LAW

201 Alhambra Circle | Suite 1205 | Coral Gables, Florida 33134-5107

Office: 305.377.1000 Ext. 108 | Direct Fax: 855.898.0454 | Toll Free: 855.213.4806

[roland@smgqlaw.com](mailto:roland@smgqlaw.com) | [SMGQLAW.com](http://SMGQLAW.com) | [Attorney Bio](#)

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**From:** Stephanie Cunningham [<mailto:Stephanie.Cunningham@myfloridalegal.com>]

**Sent:** Friday, July 22, 2016 3:08 PM

**To:** Roland Sanchez-Medina Jr.

**Cc:** Donna Malphurs

**Subject:** Fw: RR: FEC 15-372

Mr. Sanchez-Medina:

The last day for my office to receive a response to the Staff Recommendation is July 29th. This case will likely be placed on the August agenda for a probable cause determination hearing to take place on August 16th or 17th. The Commission receives the case materials prior to the meeting so that they may have adequate time to review each case. If you submit a response after the July 29th deadline it will not be received in time to be provided to the commissioners prior to the hearing. The document would still be placed in the case file but it would be at the Commission's discretion as to whether they would like to review or consider the document at the probable cause hearing.

Stephanie J. Cunningham  
Assistant General Counsel  
Florida Elections Commission  
107 W. Gaines Street  
Collins Building, Suite 224  
Tallahassee, FL 32399-1050  
[stephanie.cunningham@myfloridalegal.com](mailto:stephanie.cunningham@myfloridalegal.com)  
(850) 922-4539  
(850) 921-0783 fax

[www.fec.state.fl.us](http://www.fec.state.fl.us)

----- Forwarded by Stephanie Cunningham/OAG on 07/22/2016 02:49 PM -----

From: Florida Elections Commission/OAG  
To: Stephanie Cunningham/OAG@OAG  
Date: 07/21/2016 04:24 PM  
Subject: Fw: RR: FEC 15-372  
Sent by: Donna Malphurs

Stephanie,

Please respond to Mr. Sanchez's request for additional time to respond to the Staff Recommendation. The last day to submit information is July 29th.

Thanks,

Donna

----- Forwarded by Donna Malphurs/OAG on 07/21/2016 04:23 PM -----

From: Roland Sanchez-Medina Jr. <Roland@smgqlaw.com>  
To: "fec@myfloridalegal.com" <fec@myfloridalegal.com>  
Cc: Michael Montiel <mmontiel@smgqlaw.com>  
Date: 07/21/2016 03:35 PM  
Subject: RR: FEC 15-372

To Whom It May Concern:

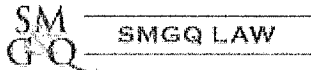
The attached correspondence is dated July 12, 2016, but was received by my office on July 19, 2016 leaving only one week to file a response. We intend to respond on behalf of our client, however, seven days (or 4 entire business days) is an inadequate amount of time and is compounded by the fact there are only 39 days left before the election.

We respectfully request an additional thirty (30) days to respond and amend the initial response with some additional information. While we understand how important it is to address potential violations of Florida's election laws, the FEC is not prejudiced in any manner by granting Ms. Regalado the additional time.

I look forward to your response.

Roland

**ROLAND SANCHEZ-MEDINA JR, ESQ.**



201 Alhambra Circle | Suite 1205 | Coral Gables, Florida 33134-5107



Office: 305.377.1000 Ext. 108 | Direct Fax: 855.898.0454 | Toll Free: 855.213.4806

[roland@smgqlaw.com](mailto:roland@smgqlaw.com) | [SMGQLAW.com](http://SMGQLAW.com) | [Attorney Bio](#)

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[attachment "InvestigationReport - FEC 15-372 - Recommendation of Probable Cause.pdf" deleted by Stephanie Cunningham/OAG]



RE: RR: FEC 15-372  
Roland Sanchez-Medina Jr.  
to:  
Stephanie Cunningham  
07/22/2016 03:29 PM  
Cc:  
Donna Malphurs, Michael Montiel  
Hide Details  
From: Roland Sanchez-Medina Jr. <Roland@smgqlaw.com>  
To: Stephanie Cunningham <Stephanie.Cunningham@myfloridalegal.com>  
Cc: Donna Malphurs <Donna.Malphurs@myfloridalegal.com>, Michael Montiel  
<mmontiel@smgqlaw.com>

Stephanie,

Thank you for your prompt response. I understand the timeline that you have provided. Unfortunately, I will be out of the office next week due to prior engagements, and will be unable to provide a comprehensive response prior to July 29<sup>th</sup>. This is prejudicial towards my client. Is there a reason that this hearing must proceed in August and cannot be pushed back to September? I'd like to reiterate that an extension will not prejudice the Commission, as we are still months away from the election. I am simply seeking the time and opportunity to provide the FEC the best possible response on behalf of my client. Thank you for your consideration.

Roland

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CIRCULAR 230 NOTICE: To comply with U.S. Treasury Department and IRS regulations, we are required to advise you that, unless expressly stated otherwise, any U.S. federal tax advice contained in this transmittal, is not intended or written to be used, and cannot be used, by any person for the purpose of (i) avoiding penalties under the U.S. Internal Revenue Code, or (ii) promoting, marketing or recommending to another party any transaction or matter addressed in this e-mail or attachment.

**From:** Stephanie Cunningham [<mailto:Stephanie.Cunningham@myfloridalegal.com>]  
**Sent:** Friday, July 22, 2016 3:08 PM  
**To:** Roland Sanchez-Medina Jr.  
**Cc:** Donna Malphurs  
**Subject:** Fw: RR: FEC 15-372

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 Subject: Fw: RR: FEC 15-372  
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Donna

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From: Roland Sanchez-Medina Jr. <[Roland@smgqlaw.com](mailto:Roland@smgqlaw.com)>  
 To: "[fec@myfloridalegal.com](mailto:fec@myfloridalegal.com)" <[fec@myfloridalegal.com](mailto:fec@myfloridalegal.com)>  
 Cc: Michael Montiel <[mmontiel@smgqlaw.com](mailto:mmontiel@smgqlaw.com)>  
 Date: 07/21/2016 03:35 PM  
 Subject: RR: FEC 15-372

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Roland

**ROLAND SANCHEZ-MEDINA JR, ESQ.**



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[attachment "InvestigationReport - FEC 15-372 - Recommendation of Probable Cause.pdf" deleted by Stephanie Cunningham/OAG]

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**In Re: Raquel A. Regalado**

---

**Case No.: FEC 15-372**

**STAFF RECOMMENDATION FOLLOWING INVESTIGATION**

Pursuant to Section 106.25(4)(c), Florida Statutes, undersigned staff counsel files this written recommendation for disposition of the complaint in this case recommending that there is **probable cause** to charge Respondent with violating **Section 106.19(1)(a), Florida Statutes**. Based upon a thorough review of the Report of Investigation submitted on June 17, 2016, the following facts and law support this staff recommendation:

1. On June 29, 2015, the Florida Elections Commission ("Commission") received a sworn complaint from Darren Centinello ("Complainant"), alleging that Raquel A. Regalado ("Respondent") violated Chapter 106, Florida Statutes.

2. Respondent is a 2016 candidate for Mayor of Miami-Dade County. Respondent's Statement of Candidate form ("DS-DE 84") was filed on March 9, 2015. (ROI Exhibit 17)<sup>1</sup>

3. By letter dated November 23, 2015, the Executive Director notified Respondent that Commission staff would investigate the following statutory provision:

**Section 106.19(1)(a), Florida Statutes:** Raquel A. Regalado, a 2016 candidate for the office of Mayor of Miami-Dade County, may have accepted one or more contributions in excess of the limits prescribed by Section 106.08, Florida Statutes, as alleged in the complaint.

4. Complainant alleged that Respondent violated Florida's election laws by accepting contributions in excess of the limits prescribed by Section 106.08, Florida Statutes. More specifically, Complaint alleged that Respondent accepted excessive in-kind contributions from Serving Miamians in the form of a professionally produced campaign website and video.

5. Under Section 106.19(1)(a), Florida Statutes, a candidate for county mayor who knowingly and willfully accepts a contribution in excess of \$1,000 commits a violation of Florida's election laws. The contribution limit applies to each election, with the primary and general election being treated as separate elections so long as the candidate is not unopposed. The race for mayor of Miami-Dade County has a primary election scheduled for August 30, 2016, with a general election scheduled for November 8, 2016.

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

6. Complainant provided a print out of Respondent's website located at <http://raquelregalado.com> as of April 2, 2015. The website contains express advocacy stating, "Raquel Regalado for Miami-Dade County Mayor." The website contains the following disclaimer: "Paid and approved by Serving Miamians." The website also contains a video. (ROI Exhibit 3) Complainant alleged that the video depicts Respondent stating "I'm Raquel Regalado, and I'm asking for your support to be the next Mayor of Miami-Dade County." Complainant alleged that the video contains a disclaimer stating: "Paid for and approved by Serving Miamians."

7. Serving Miamians is an electioneering communications organization registered with the Division of Elections. The organization's chairperson is Roland Sanchez-Medina and its treasurer is Carlos Trueba. (ROI Exhibit 2) It should be noted that Mr. Sanchez-Medina is representing Respondent in this matter and Mr. Trueba is also the treasurer for Respondent's campaign. (ROI Exhibits 1-2; ROI Exhibit 5, page 1)

8. On March 6, 2015, Ennovva Inc. issued two invoices to Serving Miamians requesting payment in the amounts of \$1,500 and \$3,580 for video production and website design. The invoices show that the campaign video was filmed on February 26, 2015, March 5, 2015, and March 6, 2015. (ROI Exhibit 13)

9. Serving Miamians disclosed two expenditures to Ennovva Inc. on March 10, 2015 in the amounts of \$1,500 and \$3,580 for the purposes of web design and advertising production, respectively. (ROI Exhibit 4) The organization's bank records confirm the reporting of the expenditures. (ROI Exhibit 15, pages 1-2) The organization's bank records also show that Ennovva Inc. issued a check in the amount of \$5,080 to Serving Miamians on September 25, 2015. (ROI Exhibit 15, page 3)

10. On April 8, 2015, Respondent filed her first campaign treasurer's report (2015 M3 Report). The report shows that at the time Serving Miamians paid the invoices and the work had already been completed (March 10, 2015), Respondent had not yet received any campaign contributions. Respondent's first contribution was received on March 12, 2015 and was in the amount of \$250. (ROI Exhibit 8)

11. Respondent's 2015 M9 Report shows two expenditures to Ennovva Inc. on September 25, 2015 in the amounts of \$1,500 and \$3,780 for the purposes of web design and advertising production, respectively. (ROI Exhibit 9, page 4) Commission staff requested that Respondent provide copies of the checks showing that Respondent paid Ennovva Inc. for the web design and advertising production, but Respondent failed to provide the records and Respondent's designated campaign depository was unable to locate an account in her name. (Attachment A, Phone Log Entries 15, 22-23)

12. Respondent stated that Serving Miamians mistakenly engaged Ennovva Inc. to design the website for Respondent. Respondent stated that Serving Miamians later requested and received a refund and that Respondent then paid for the work already performed along with an extra fee to change the disclaimer in the video found on the website and remove the references to Serving Miamians on the website and video. Respondent stated that Serving Miamians intended

to engage Ennovva Inc. to create videos in furtherance of its purpose as an electioneering communications organization. She stated that the website went live on March 9, 2015 but was not intended to be accessed by visitors. She stated that the website was taken down upon receipt of the Commission's letter dated September 4, 2015. (ROI Exhibit 5, page 2)

13. Respondent stated that she did not have any communications with Serving Miamians regarding the creation of the website or video. She stated that she appeared in the video but did not review or approve it before it went live. She also stated that she became aware that the video was available on the website when she received a copy of the complaint in this matter. (ROI Exhibit 11)

14. Mr. Sanchez-Medina, chairperson, Serving Miamians, and attorney for Respondent, stated that the organization made an expenditure to Ennovva Inc. for web design and for the creation of a video. Mr. Sanchez-Medina stated that Ennovva Inc. created the disclaimer as a result of the execution of the contract between Serving Miamians and Ennovva Inc. He stated that the website was not approved or reviewed and not intended to go live. Mr. Sanchez-Medina thinks that Ennovva Inc. was testing the design and connectivity of the website when the video was erroneously uploaded. He stated that the language included in the video requesting support for Respondent was simply a mistake as the intent of video was to educate Miami-Dade County regarding various issues. (ROI Exhibit 12)

15. Mr. Sanchez-Medina stated that Amelie Ferro, CEO, Ennovva Inc. d/b/a Cimacast, was responsible for the verbiage on the website. (ROI Exhibit 12, page 1) Commission staff attempted to contact Ms. Ferro regarding Respondent's and Serving Miamians' involvement in the production of the campaign website and video, but Ms. Ferro failed to respond to Commission staff's investigation. (Attachment A, Phone Log Entries 19-21; ROI Exhibit 14)

16. On February 26, 2015, March 5, 2015, and March 6, 2015, Respondent filmed scenes for the campaign video. Between February 26, 2015 and March 6, 2015, the campaign website was designed. On March 9, 2015, the campaign website and video were published, and Respondent became a candidate for Mayor of Miami-Dade County. On March 10, 2015, Serving Miamians paid Ennovva Inc. for the production of the campaign website and video. On March 12, 2015, Respondent received her first campaign contribution which totaled \$250. On April 2, 2015, Complainant printed a copy of Respondent's website which formed the basis of the complaint. On September 4, 2015, the campaign website and video were no longer available to the public.

17. The campaign video was filmed before Respondent became a candidate and published, along with the website, before Respondent ever received any campaign contributions. Serving Miamians had a contract with Ennovva Inc. Ennovva Inc. issued invoices to Serving Miamians for video production and website design and Serving Miamians paid those invoices. The website and video contained language expressly advocating for the election of Respondent and contained disclaimers stating that the website and video were paid for and approved by Serving Miamians. Respondent personally appeared in the video. The website and video were available to the public for at least 179 days.

18. The website is currently active and contains a video showing Respondent speaking directly to the camera for approximately one and a half minutes. In the video Respondent announces her candidacy and briefly discusses her opponent and platform before asking for support in the coming election. It is likely that this is the same video that was originally published as Respondent stated that she appeared in the original video and that she had to pay a small fee at a later date to change the disclaimer in the video.

19. The campaign website and video are in-kind contributions. They expressly advocate for the election of a candidate and were coordinated with the candidate, who appears in the video. Therefore, they are not electioneering communications nor are they independent expenditures.

20. It is of no import that the campaign website and video were not intended to be released to the public when they ultimately were. On March 10, 2015, an excessive in-kind contribution had already been accepted by Respondent regardless if the public could view the website and video. Further, it is simply not believable that the language included in the video requesting support for Respondent was simply a mistake because it was the intent of Serving Miamians' that the video educate Miami-Dade County regarding various issues. Ennovva Inc. invoiced Serving Miamians prior to Respondent becoming a candidate and Serving Miamians paid the invoices at a time when Respondent did not have the funds to incur the expenditures for the professionally produced campaign website and video.

21. Respondent accepted in-kind contributions from Serving Miamians in excess of the limits prescribed by Section 106.08, Florida Statutes.

22. "Probable Cause" is defined as reasonable grounds of suspicion supported by circumstances sufficiently strong to warrant a cautious person in the belief that the person has committed the offense charged. *Schmitt v. State*, 590 So. 2d 404, 409 (Fla. 1991). Probable cause exists where the facts and circumstances, of which an [investigator] has reasonably trustworthy information, are sufficient in themselves for a reasonable man to reach the conclusion that an offense has been committed. *Department of Highway Safety and Motor Vehicles v. Favino*, 667 So. 2d 305, 309 (Fla. 1st DCA 1995).

23. The facts set forth above show that Respondent is a 2016 candidate for Mayor of Miami-Dade County. Respondent accepted in-kind contributions from Serving Miamians in excess of the limits prescribed by Section 106.08, Florida Statutes.

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

**Count 1:**

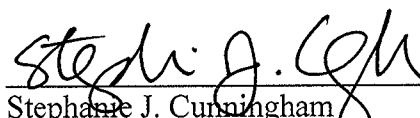
On March 10, 2015, Raquel A. Regalado violated Section 106.19(1)(a), Florida Statutes, when she accepted a contribution in excess of the limits prescribed by Section 106.08, Florida Statutes.



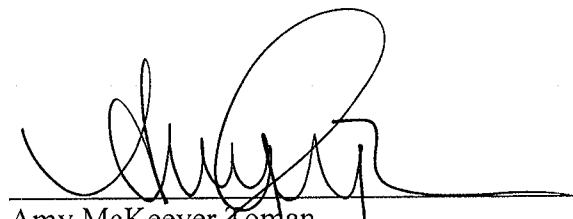
**Count 2:**

On March 10, 2015, Raquel A. Regalado violated Section 106.19(1)(a), Florida Statutes, when she accepted a contribution in excess of the limits prescribed by Section 106.08, Florida Statutes.

Respectfully submitted on July 12, 2016.

  
Stephanie J. Cunningham  
Assistant General Counsel

I reviewed this Staff Recommendation this 12th day of July 2016.

  
Amy McKeever Toman  
Executive Director

**FLORIDA ELECTIONS COMMISSION  
PHONE LOG  
Case No.: FEC 15-372**

**Respondent: Raquel Regalado**

**Complainant: Darren Centinello**

1. **Date and time:** February 11, 2016 @ 3:10 p.m.  
**Name:** Barbara Herrera, SOE's office  
**Phone #:** 305-499-8376  
**Summary:** Ms. Herrera stated that they had completed the affidavit and sent it to me certified. Ms. Herrera asked if I would like her to email the affidavit to me. I answered affirmatively and gave her my email address.  
**Memo to File?** No  
**Entered by:** MBW
2. **Date and time:** March 14, 2016 @ 11:04 a.m.  
**Name:** Elliot Berke, C's attorney  
**Phone #:** 202-517-0585  
**Summary:** I called Mr. Berke to introduce myself as the investigator assigned to the case and to inform him that I am preparing a questionnaire affidavit for his client. There was no answer; I left a message on his voice mail.  
**Memo to File?** No  
**Entered by:** MBW
3. **Date and time:** March 15, 2016 @ 8:28 a.m.  
**Name:** Mr. Berke  
**Phone #:** 202-517-0585  
**Summary:** I returned an earlier call from Mr. Berke. He did not answer. I left a message.  
**Memo to File?** No  
**Entered by:** MBW
4. **Date and time:** March 15, 2016 @ 11:23 a.m.  
**Name:** Mr. Berke  
**Phone #:** 202-517-0585  
**Summary:** Mr. Berke returned my call. I informed him that I had a couple of questions for his client to clarify information in the complaint narrative. I told him that I compiled a questionnaire and mailed it yesterday. I asked him to ask his client to complete and return the questionnaire. He agreed.  
**Memo to File?** No  
**Entered by:** MBW
5. **Date and time:** March 23, 2016 @ 11:03 a.m.  
**Name:** Ennovva  
**Phone #:** 855-366-6882  
**Summary:** I called the vendor at the telephone number that is posted on their website. The is a non-working number.  
**Memo to File?** No

**Entered by:** MBW

6. **Date and time:** April 7, 2016 @ 8:51 a.m.  
**Name:** Roland Medina, R's attorney  
**Phone #:** 305-593-2644  
**Summary:** I returned a call from Mr. Medina. He was not in; I left a message with his assistant.  
**Memo to File?** No  
**Entered by:** MBW
7. **Date and time:** April 8, 2016 @ 11:07 a.m.  
**Name:** Connie Pazos  
**Phone #:** 305-377-1000 ex108  
**Summary:** Ms. Pazos returned my earlier call. She stated that they are the treasurer for Respondent's campaign. I informed her that when I called yesterday, I thought this number was the number for Roland Medina; she stated that it was not. She asked what I needed, she stated that she would try to assist me. I informed her that when I called yesterday, I was returning a call from that number. She was not aware of anyone calling the FEC. Ms. Pazos gave me Mr. Medina's telephone number, 305-377-1000.  
**Memo to File?** No  
**Entered by:** MBW
8. **Date and time:** April 11, 2016 @ 9:11 a.m.  
**Name:** Respondent  
**Phone #:** 786-306-9180  
**Summary:** I returned an earlier call. (Respondent called Friday at 4:52 p.m. and left a message on my voice mail that she was trying to reach me to ask for an extension on the deadline to return the affidavit.) There was no answer; the mailbox was full.  
**Memo to File?** No  
**Entered by:** MBW
9. **Date and time:** May 2, 2016 @ 2:06 p.m.  
**Name:** Roland Medina, R's atty  
**Phone #:** 305-377-1000 ex. 108  
**Summary:** I called R's attorney to discuss resolving the case since I did not receive the affidavit back. He stated that he never received the affidavit. He stated that if I emailed the affidavit to him he would return it promptly. He stated that his email address is Roland@smgqlaw.com. I agreed.  
**Memo to File?** No  
**Entered by:** MBW
10. **Date and time:** May 10, 2016 @ 12:16 p.m.  
**Name:** Roland Sanchez-Medina  
**Phone #:** 305-377-1000  
**Summary:** I called R's attorney regarding the outstanding affidavits (R's and the ECO). He was not in; I left a message on his voice mail.  
**Memo to File?** No  
**Entered by:** MBW

11. **Date and time:** May 13, 2016 @ 11:11 a.m.  
**Name:** Roland Sanchez-Medina  
**Phone #:** 305-377-1000  
**Summary:** I called R's attorney regarding the outstanding affidavits (R's and the ECO). He was not in; I left a message with the receptionist.  
**Memo to File?** No  
**Entered by:** MBW
12. **Date and time:** May 16, 2016 @ 4:13 p.m.  
**Name:** Roland Sanchez-Medina  
**Phone #:** 305-377-1000  
**Summary:** I called R's attorney regarding the outstanding affidavits (R's and the ECO). According to the receptionist, he was on another line. I left a message on his voice mail.  
**Memo to File?** No  
**Entered by:** MBW
13. **Date and time:** May 19, 2016 @ 1:51 p.m.  
**Name:** Roland Sanchez-Medina  
**Phone #:** 305-377-1000  
**Summary:** I called R's attorney in response to an email in which he queried about a pre-probable cause consent order. I explained the procedure for a pre-probable cause consent order. He stated that he would speak to his client and call me back tomorrow morning.  
**Memo to File?** No  
**Entered by:** MBW
14. **Date and time:** May 20, 2016 @ 12:02 p.m.  
**Name:** Roland Sanchez-Medina  
**Phone #:** 305-377-1000  
**Summary:** I called R's attorney because we agreed that he would let me know this morning whether or not his client want to enter a pre-probable cause consent order. He was not in; I left a message on his voice mail.  
**Memo to File?** No  
**Entered by:** MBW
15. **Date and time:** May 20, 2016 @ 12:41 p.m.  
**Name:** Roland Sanchez-Medina  
**Phone #:** 305-377-1000  
**Summary:** Mr. Sanchez-Medina returned my call. He stated that Mr. Michael Montiel, another attorney with the firm, was also present on the call. He stated that he has decided to complete the affidavits and send the requested information (checks to and from the vendor). He asked if it were possible for me to re-send the affidavits. I answered affirmatively. I asked when would I receive the affidavit and bank records (initial check to Ennovva, refund from Ennovva and the checks from Respondent's campaign to Ennovva). He stated that he would get the information to me by Tuesday. I agreed.  
**Memo to File?** No  
**Entered by:** MBW
16. **Date and time:** May 26, 2016 @ 8:48 a.m.

**Name:** Roland Sanchez-Medina

**Phone #:** 305-377-1000

**Summary:** I received a call from Respondent's atty. He stated that he was aware that they missed the deadline for the affidavits. He stated that the candidate has been out of town. He asked for an extension until Monday. He stated he would scan an email the documents and overnight the originals. I agreed.

**Memo to File?** No

**Entered by:** MBW

17. **Date and time:** May 26, 2016 @ 9:38 a.m.

**Name:** Roland Sanchez-Medina

**Phone #:** 305-377-1000

**Summary:** I received an email from Mr. Sanchez-Medina requesting that I call him. I called. His assistant, Karen, stated that he was on another line. I left my name and number.

**Memo to File?** No

**Entered by:** MBW

18. **Date and time:** May 26, 2016 @ 1:35 p.m.

**Name:** Roland Sanchez-Medina

**Phone #:** 305-377-1000

**Summary:** Mr. Sanchez-Medina returned my call. I explained that the extension from Monday until Tuesday in my email was due to the Memorial Day Holiday. He thanked me for the correction.

**Memo to File?** No

**Entered by:** MBW

19. **Date and time:** June 1, 2016 @ 3:23 p.m.

**Name:** Amelie Ferro, Web Designer

**Phone #:** 305-938-0728

**Summary:** I called Ms. Ferro to query about Respondent's website. She stated that she was on the phone and asked me to call back in 5 or 10 minutes. I agreed.

**Memo to File?** No

**Entered by:** MBW

20. **Date and time:** June 1, 2016 @ 3:39 p.m.

**Name:** Amelie Ferro, Web Designer

**Phone #:** 305-938-0728

**Summary:** I called Ms. Ferro again as she requested. I explained why I was calling. Ms. Ferro stated that it would be better for her if I sent a list of questions to her via email. I agreed. She stated that her email address is [aferro@cimacast.com](mailto:aferro@cimacast.com).

**Memo to File?** No

**Entered by:** MBW

21. **Date and time:** June 9, 2016 @ 10:03 a.m.

**Name:** Amelie Ferro, Web Designer

**Phone #:** 305-938-0728

**Summary:** I called Ms. Ferro to query about the email that I sent her after our previous conversation. No one answered; I left a message.

**Memo to File?** No

**Entered by:** MBW

22. **Date and time:** June 14, 2016 @ 10:31 a.m.

**Name:** Michael Montiel, R's atty.

**Phone #:** 305-377-1000

**Summary:** I called Mr. Montiel to request copies of the checks Respondent issued to Ennovva. He was not in; I left a message.

**Memo to File?** No

**Entered by:** MBW

23. **Date and time:** June 15, 2016 @ 9:45 p.m.

**Name:** Mayra Espinola, City National Bank

**Phone #:** 305-577-7294

**Summary:** I called Ms. Espinola regarding the Serving Miamians subpoena. She stated that she received two subpoenas from the FEC. I affirmed that two were sent. She stated that they could not find the records for one (Regalado). She stated that the production for the other subpoena was mailed last week in the form of a disc.

**Memo to File?** No

**Entered by:** MBW

24. **Date and time:** June 16, 2016 @ 9:18 a.m.

**Name:** Michael Montiel, R's atty.

**Phone #:** 305-377-1000

**Summary:** I called Mr. Montiel for the final interview. He was not in; I left a message.

**Memo to File?** No

**Entered by:** MBW

25. **Date and time:** June 16, 2016 @ 1:37 p.m.

**Name:** Michael Montiel, R's atty.

**Phone #:** 305-377-1000

**Summary:** Mr. Montiel called me back at 12:29 p.m. and left a message on my voice mail. I returned his call. He was at lunch; I left a message.

**Memo to File?** No

**Entered by:** MBW

26. **Date and time:** June 16, 2016 @ 3:44 p.m.

**Name:** Michael Montiel, R's atty.

**Phone #:** 305-377-1000

**Summary:** I called Mr. Montiel for the final interview. He stated that the whole thing was just a mix-up because the company didn't really understand the election process. They didn't understand that the ECO and the candidate had different rules and restrictions. He stated that Ennovva stated that they were using the website as a test site and it wasn't supposed to be a "live" site and the vendor didn't tell them; therefore, they were not aware that the website was "live" until they received notification from the FEC.

He stated that the ECO never paid the second half of the cost because it was their understanding that the website was still incomplete. (The invoice requires that the remaining balance be paid upon completion.)

I explained that I had completed my report of investigation and I summarized the information in the report and asked if he had any additional comments. He stated he did not.

I explained the remaining procedure and informed him that he would be notified when the case goes before the Commission.

**Memo to File?** No

**Entered by:** MBW

27. **Date and time:**  
**Name:**  
**Phone #:**  
**Summary:**  
**Memo to File?** No  
**Entered by:**

28. **Date and time:**  
**Name:**  
**Phone #:**  
**Summary:**  
**Memo to File?** No  
**Entered by:**

29. **Date and time:**  
**Name:**  
**Phone #:**  
**Summary:**  
**Memo to File?** No  
**Entered by:**

30. **Date and time:**  
**Name:**  
**Phone #:**  
**Summary:**  
**Memo to File?** No  
**Entered by:**

31. **Date and time:**  
**Name:**  
**Phone #:**  
**Summary:**  
**Memo to File?** No  
**Entered by:**

**FLORIDA ELECTIONS COMMISSION**  
**REPORT OF INVESTIGATION**  
**Case No.: FEC 15-372**

**Respondent: Raquel A. Regalado**

Counsel for Respondent: Roland Sanchez-Medina, Jr.

**Complainant: Darren Centinella**

Counsel for Complainant: Elliot S. Berke

On June 29, 2015, the Florida Elections Commission received a sworn complaint alleging that Respondent violated Chapter 106, Florida Statutes. Commission staff investigated whether Respondent violated the following statute:

Section 106.19(1)(a), Florida Statutes, prohibiting a person or organization from accepting a contribution in excess of the legal limits.

**I. Preliminary Information:**

1. Respondent is a 2016 candidate for the office of Mayor for Miami-Dade County. There are five other candidates in the race including incumbent candidate, Carlos Gimenez. Respondent is not a first-time candidate. In 2010, she was elected to the school board. In 2014, she was re-elected, unopposed. In 2002, Respondent was admitted to the Florida Bar.

2. On March 9, 2015, Respondent filed her Appointment of Campaign Treasurer and Designation of Campaign Depository for Candidates (DS-DE) form. Respondent named Carlos M. Trueba as her treasurer. To review the DS-DE 9 form, refer to Exhibit 1.

3. Respondent was represented by Roland Sanchez-Medina, Jr. during this investigation. Michael Montiel, another attorney with the firm, also assisted during the investigation.

4. Serving Miamians is an active electioneering communication organization (ECO) registered with the Division of Elections. Roland Sanchez-Medina, Jr. is listed as its chairman and Carlos M. Trueba (Respondent's treasurer) is listed as its treasurer. To review the printout from the Division of Elections website, refer to Exhibit 2.

5. Complainant is the digital communications manager for American Commitment based in Washington, D.C. He has been involved with a number of election campaigns including the 2012 Romney for President Campaign.

**II. Alleged Violation of Section 106.19(1)(a), Florida Statutes:**

6. I investigated whether Respondent violated this section of the election laws by accepting an excessive in-kind contribution from Serving Miamians.

7. According to Complainant, Respondent accepted an excessive in-kind contribution from Serving Miamians in the form of her campaign website and a campaign video, which contained express advocacy that supported her campaign. To review the printout of the website, refer to Exhibit 3.



8. Complainant provided a printed copy of Respondent's webpage. It appears to contain a button from a video; however, Complainant did not include a copy of the video. The webpage states, "Raquel Regalado for Miami-Dade County Mayor." The disclaimer reads, "Paid and approved by Serving Miamians."

9. According to the Division of Elections website, Serving Miamians disclosed two expenditures on its 2015 M3 Report to "Ennovva, Inc." The information on the 2015 M3 Report revealed that the two expenditures occurred on March 10, 2015; one for \$1500 for "Web Design" and one for \$3580 for "Advertising Production." To review the printout of the expenditures from the 2015 M3 Report from the Division of Elections website, refer to Exhibit 4.

10. Respondent's attorney, Mr. Sanchez-Medina, filed a response on behalf of Respondent. He stated that Serving Miamians, ECO,

Mistakenly engaged Ennovva, Inc. (the Vendor) to design the website for [www.raquelregalado.com](http://www.raquelregalado.com)... The Vendor has since returned the funds to Serving Miamians...Ms. Regalado's [Respondent] campaign account has since paid the Vendor for the work performed, as well as an extra fee for changing the disclaimers on the video found on the Website, and removing all references to Serving Miamians, both on the Website and in the video.

Currently, the Website is offline and any visitors will find a message with states that the Website is under construction.

To review the written statement, refer to Exhibit 5. To review the refund check, refer to Exhibit 6.

11. The table below is a time line of events regarding the publication of Respondent's website.

TABLE 1: TIME LINE OF EVENTS		
Date	Event	Exhibit
03/09/15	Website, <a href="http://www.raquelregalado.ccom">www.raquelregalado.ccom</a> , went live	3
03/09/15	Respondent filed her DS-DE 9	1
03/10/15	Serving Miamians pays vendor	7
03/12/15	CTR shows Respondent's first contribution for \$250	8
04/02/15	Complainant printed copy of website	3
06/25/16	Complainant swore to the complaint	--
06/29/15	FEC received complaint	--
09/04/15	Copy of website provided by R's attorney	5, page 3
09/25/15	CTR shows Respondent pays vendor	9
01/21/16	I printed Respondent's website	10

12. According to Respondent, she did not become aware of the website until she received the letter from the Florida Elections Commission regarding the complaint. When asked if she reviewed the video before it was posted on the website, Respondent replied, "though I appear in the video, I had not reviewed the final product." Respondent also stated that she did not discuss the website with any of the officers or members of Serving Miamians. To review Respondent's affidavit, refer to Exhibit 11.

13. When asked what actions were taken to prevent visitors from accessing the website, Respondent replied, "The Website was not intended to be viewed by any visitors during the time the video was posted. Upon receipt of the letter from the Florida Elections Commission dated June 30, 2015, I contacted Ennova (sic), Inc. and demanded that the video and the website be taken offline immediately." To review Respondent's affidavit, refer to Exhibit 11.

14. According to Mr. Roland Sanchez-Medina, the ECO's chairman, the ECO did not pay for advertising. Mr. Sanchez-Medina stated that the ECO paid for the web design and the creation of one video. He stated that the officers and members of the ECO did not discuss the website with Respondent. To review Mr. Sanchez-Medina's affidavit, refer to Exhibit 12.

15. When questioned about who reviewed and approved the website, Mr. Sanchez-Medina stated,

The Website had not been approved or reviewed. As referenced in the letter above, the website was in a period of initial construction and was not intended to go "live" at the time of posting of the video. The Website was not completed and no content was available on Website. To my knowledge, Ennovva, Inc. was in the process of testing the design and connectivity of the website at the time the video was erroneously uploaded.

To review Mr. Sanchez-Medina's affidavit, refer to Exhibit 12. To review the website, refer to Exhibit 3.

16. When asked why the ECO published the website, Mr. Sanchez-Medina stated,

Servicing Miamians was in the process of publishing a new website about Raquel Regalado in conformity with IRS rules and regulations. Serving Miamians has been informing Miami-Dade County residents regarding Raquel Regalado and Tomas Regalado for five (5) years. The language included in the video requesting support for Ms. Regalado was simply a mistake, as the intent of the video was to educate Miami-Dade County regarding various issues. The video was immediately removed from the Website.

To review Mr. Sanchez-Medina's affidavit, refer to Exhibit 12. To review the website, refer to Exhibit 3.

17. Invoices provided by Mr. Sanchez-Medina show that the video was filmed and edited on February 26, 2015, March 5, 2015 and March 6, 2015. The cost for the video was \$3,580.00. The invoice for the web design shows a cost of \$3000; half due up front and half due at the completion of the website. To review the invoices, refer to Exhibit 13.

18. Serving Miamians issued two checks on March 10, 2015; one for \$3580 and one for \$1500. On September 25, 2015, Ennovva, Inc. issued a check to Serving Miamians for \$5080. (The Commission received the complaint on June 29, 2015.) To review copies of the

checks, refer to Exhibit 7.

19. Mr. Sanchez-Medina also stated on his affidavit that Ms. Amelie Ferro was responsible for the verbiage on the website. I called Ms. Ferro to query about whether Respondent assisted with the development of the website. During a telephone interview, she stated that she preferred for me to send her my questions in writing via email. I emailed the questions to Ms. Ferro; however, she did not respond. To review my email to Ms. Ferro, refer to Exhibit 14.

20. I requested that Respondent's attorney provide copies of the checks issued from Respondent's campaign to Ennovva, Inc. (the vendor); however, the checks were never provided. I subpoenaed bank records from the bank listed on Respondent's DS-DE 9, City National Bank; however, the bank stated that they could not find an account in Respondent's name.

21. I subpoenaed the ECO's bank records. The bank records confirmed that the ECO issued the checks to Ennovva, Inc. on March 10, 2015. Ennovva, Inc. issued a refund check to the ECO on September 25, 2015. To review the bank records, refer to Exhibit 15.

22. No record of Respondent having previously violated this section of the election laws was found.

### **III. FEC History:**

23. Respondent was named in FEC 12-041 that alleged a violation of Section 106.07(5), Florida Statutes. Respondent entered a pre-probable cause consent order and paid a \$2,000 fine on March 9, 2012. Respondent was also named in FEC 12-087; however, it was deemed legally insufficient.

### **Conclusion:**

24. On June 16, 2016, I interviewed Mr. Montiel, Respondent's attorney, by telephone. He stated that the entire thing was a "mix-up" because the vendor really didn't understand the election process. He stated that Ennovva (vendor) didn't realize that the ECO and the candidate had different rules and restrictions. He added that Ennovva told them that they were using the website as a test site. He stated that they (the ECO) were not aware of the test site. He added that they were not aware that the website was "live" until they received the notification from the Florida Election Commission. He stated that the invoice shows that half of the cost is required up front and the remaining balance is due upon completion; the ECO never paid the remaining balance because it was their understanding that the website was incomplete.

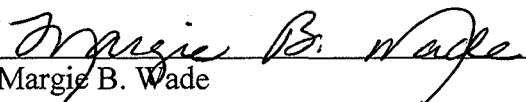
25. Respondent's filing officer is the Miami-Dade Supervisor of Elections. According to the Affidavit of Filing Officer, Respondent was not a first-time candidate. According to the affidavit, Respondent was initially elected to the County School Board, District 6, in 2010. In 2014, she was unopposed. The filing officer stated that Respondent received copies of Chapters 104 and 106, Florida Statutes, and the *2016 Candidate and Campaign Treasurer Handbook*. To review the Affidavit of Filing Officer, refer to Exhibit 16.

26. Respondent acknowledged receiving copies of Chapter 106, Florida Statutes and the *Candidate and Campaign Treasurer Handbook*. She stated that she served as treasurer for Tomas Regalado's mayoral campaign in 2008. When asked what actions she had taken to determine her responsibilities under Florida's election law, Respondent stated, "I am a constitutionally elected official." To review Respondent's affidavit, refer to Exhibit 11.

27. On March 9, 2015, Respondent filed the Statement Candidate form certifying that

she had been provided access to read and understand the requirements of Chapter 106, Florida Statutes. To review the statement of candidate, refer to Exhibit 17.

Respectfully submitted on June 17, 2016.

  
Margie B. Wade  
Investigation Specialist

**Current address of Respondent**

The Honorable Raquel Regalado  
1985 NW 88<sup>th</sup> Court, Suite 101  
Doral, Florida 33172

**Current address of Complainant**

Mr. Darren Centinello  
c/o Berke Farah LLP  
1200 New Hampshire Ave. NW, Suite 800  
Washington, DC 20036

**Current Address of Respondent's Atty.:**

Roland Sanchez-Medina, Jr.  
SM & GQ Attorneys at Law  
201 Alhambra Circle, Suite 1205  
Coral Gables, Florida 33134-5107

**Current Address of Complainant's Atty.:**

Elliot S. Berke, Esquire, Managing Partner  
Berke Farah, LLP  
1200 New Hampshire, NW, Suite 800  
Washington, DC 20036

**Name and Address of Filing Officer:**

Ms. Christina White  
Miami-Dade Supervisor of Elections  
Post Office Box 521550  
Miami, Florida 33152-1550

Copy furnished to:

Mr. David Flagg, Investigator Manager

**FLORIDA ELECTIONS COMMISSION**  
**REPORT OF INVESTIGATION**  
**Raquel Regalado -- FEC 15-372**

<b>LIST OF EXHIBITS</b>	
<b>Exhibits #s</b>	<b>Description of Exhibits</b>
Exhibit 1	DS-DE 9 Form
Exhibit 2	Printout from the Division of Elections Website
Exhibit 3	Printout of Website
Exhibit 4	Written Statement from the Attorney
Exhibit 5	ECO's 2015 M3 Report Expenditures
Exhibit 6	Refund Check
Exhibit 7	ECO's Checks to Vendor
Exhibit 8	2015 M3 Report
Exhibit 9	2015 M9 Report
Exhibit 10	Website Printout
Exhibit 11	Respondent's Affidavit
Exhibit 12	Mr. Sanchez-Medina Affidavit
Exhibit 13	Invoices
Exhibit 14	Email to Ms. Ferro
Exhibit 15	Bank Records
Exhibit 16	Affidavit of Filing Officers
Exhibit 17	Statement of Candidate

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

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

(PLEASE PRINT OR TYPE)

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

RECEIVED

2015 MAR -9 AM 10:18

MIAMI-DADE  
ELECTIONS

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)

Raquel A. Regalado

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

1850 SW 36th Avenue  
Miami, FL 33145

**4. Telephone**

(305 ) 593-2644

**5. E-mail address**

raquelregaladopa@gmail.com

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

Miami-Dade County Mayor

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

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

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

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

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

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

Carlos M. Trueba

**11. Mailing Address**

1985 NW 88th Court, Suite 101

**12. Telephone**

( 305 ) 593-2644

**13. City**

Doral

**14. County**

Miami-Dade

**15. State**

FL

**16. Zip Code**

33172

**17. E-mail address**

cpazos@rtc-cpa.com

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

**19. Name of Bank**

City National Bank

**20. Address**

8725 NW 18th Terrace

**21. City**

Miami

**22. County**

Miami-Dade

**23. State**

Florida

**24. Zip Code**

33172

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

**25. Date**

March 9, 2015

**26. Signature of Candidate**

X

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

I, Carlos M. Trueba, do hereby accept the appointment  
(Please Print or Type Name)

designated above as: ☒ Campaign Treasurer    ☐ Deputy Treasurer

March 9, 2015

Date

X

Signature of Campaign Treasurer or Deputy Treasurer

*Committee Tracking System*

**Serving Miamians**

**Type:**Electioneering Communications Organization

**Status:**Active

**Address:**1985 Northwest 88th Court

Suite 101

Doral, FL 33172

**Phone:**(305)593-2644

**Chairperson:**Roland Sanchez-Medina

**Treasurer:**Carlos Trueba

1985 Northwest 88th Court

Suite 101

Doral, FL 33172

**Registered Agent:**Parker D Thomson

200 South Biscayne Boulevard

Suite 400

Miami, FL 331310000

**Purpose:**

**Affiliates:**

Campaign Finance Activity

Campaign Documents

**EXHIBIT** 2

RAQUEL  
REGALADO



LATEST NEWS

★ ENGLISH ★

★ ESPAÑOL ★

## Raquel Regalado for Miami-Dade County Mayor

---

### About Raquel Regalado

Raquel Regalado is a lifelong resident of the Miami-Dade County School Board District 6, which encompasses the areas of Key Biscayne, the Roads, East Little Havana, Shenandoah, Silver Bluff, Coconut Grove, Coral Gables, South Miami and Westchester. On the Board, Ms. Regalado chairs the Facilities and Construction Reform Committee, and serves as a member of the Instructional Excellence & Community Engagement, School Support & Accountability, and Innovation,



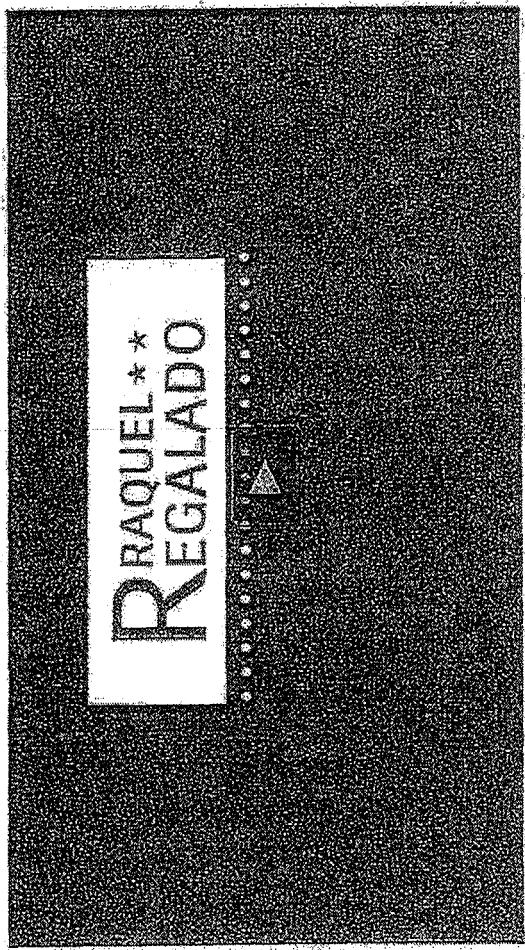
partners to teach the basics of computer programming, also known as Code, to all MDCPS students. Ms. Regalado has also organized several law days throughout the district for residents and parents to meet with pro bono attorneys and government agencies where participants receive advice regarding issues ranging from foreclosure and landlord tenant rights to disability benefits.

As a School Board Member, she has paved the way for improvements in district wide transportation and brought to the board a five year plan which resulted in the replacement of old and inefficient school buses with energy efficient buses that exceed the state's safety requirements. As a member of the Southeast Florida Regional Partnership Executive Committee, she helped devise the Seven50 plan to secure the economic future and improving the quality of life in the seven-county region comprising Monroe, Miami-Dade, Broward, Palm Beach, Martin, St. Lucie and Indian River counties during the next 50 years and beyond.

At the national level, Ms. Regalado has participated in programs regarding comprehensive immigration reform and the school districts role in assimilation and English learning. As a board member of the National Association of Latino Elected and Appointed Officials (NALEO) Ms. Regalado has spoken nationally on the need for immigration reform and on juvenile justice and the benefits of Florida's civil citation alternative. As a Hispanic English learner, Ms. Regalado has also been an advocate for bilingual education, a frequent speaker at conferences to explain public education from an English learners' perspective, debunk the myth that English learners are not academic achievers; and championed the important role that bilingual education will have in Florida's new economy.

A graduate of Coral Gables High, Ms. Regalado attended Miami-Dade Community College and then Florida International University, earning a degree in Liberal Studies with honors, earning a Juris Doctorate degree from St. Thomas University School of Law. At St. Thomas, she was the recipient of the Florida Bar's Young Lawyers Division Scholarship and winner of the St. Thomas University School of Law C. Clyde Atkins Memorial Moot Court Competition and American Trial Lawyers Association Open/Close Competition. Ms. Regalado was a member of the St. Thomas Law Review and the Moot Court Team.

Ms. Regalado is admitted to practice law in Florida state courts and in the United



★ ENGLISH ★

★ ESPAÑOL ★

Raquel Regalado for Miami-Dade County Mayor



About

dedicated to securing the economic future and improving the quality of life of the South County region, comprising Miami, Miami-Dade, Broward, Palm Beach, Martin, St. Lucie and Indian River counties during the next 50 years and beyond.

At the national level, Ms. Regalado has participated in programs regarding comprehensive immigration reform and the school districts role in assimilation and English learning. As a board member of the National Association of Latino Elected and Appointed Officials (NALEO) Ms. Regalado has spoken nationally on the need for immigration reform and on juvenile justice and the benefits of Florida's civil citation alternative. As a Hispanic English learner, Ms. Regalado has also been an advocate for bilingual education, a frequent speaker at conferences to explain public education from an English learners' perspective, debunk the myth that English learners are not academic achievers, and championed the important role that bilingual education will have in Florida's new economy.

A graduate of Coral Gables High, Ms. Regalado attended Miami-Dade Community College and then Florida International University, earning a degree in Liberal Studies with honors, earning a Juris Doctorate degree from St. Thomas University School of Law. At St. Thomas, she was the recipient of the Florida Bar's Young Lawyers Division Scholarship and winner of the St. Thomas University School of Law C. Clyde Atkins Memorial Moot Court Competition and American Trial Lawyers Association Open/Close Competition. Ms. Regalado was a member of the St. Thomas Law Review and the Moot Court Team.

Ms. Regalado is admitted to practice law in Florida state courts and in the United States District Court for the Southern District of Florida. Ms. Regalado is an active member of several bar associations, including the American Bar Association, Cuban American Bar Association, and is the member of the Intellectual Property Law Association of Florida. She was an Adjunct Professor of Business Law at Miami Dade College, Wolfson Campus. Ms. Regalado was named a Rising Star in Intellectual Property Litigation by Florida Trend magazine and named among the top 40 attorneys in Miami-Dade County under 40 years old by the Cystic Fibrosis Foundation.

Since 2009, Ms. Regalado has conducted a daily Spanish language radio program on La Poderosa, 670 AM, dedicated to informing listeners about local politics, education and social services. Another of her projects is Esta Semana con Raquel, a weekly television show with political and news analysis, airing on Telemiami throughout the state of Florida. Interview from Esta Semana con Raquel can be seen on <http://www.youtube.com/user/RaquelRegalado/videos>. Ms. Regalado also writes for El Nuevo Herald and the Huffington Post and has contributed to the Miami Herald, El Diario de las Americas, Libre, Libertad and Community Papers. Having written dozens of articles her latest ones can be found on <http://raquelregaladoopinions.blogspot.com/>. Finally, Ms. Regalado is a member of the Community Advisory Board of WLRN, Channel 17, in Miami, Florida.

Ms. Regalado is the proud mother of two children and the daughter of Tomas Regalado, the Mayor of the City of Miami.



EXHIBIT 3 page 4 of 4



Florida Department of State  
Division of Elections

## Campaign Expenditures

Serving Miamians

*This information is being provided as a convenience to the public, has been processed by the Division of Elections and should be cross referenced with the original report on file with the Division of Elections in case of questions.*

About the Campaign Finance Data Base

Rpt Yr	Rpt Type	Date	Amount	Expense Paid To	Address	City State Zip	Purpose
2015	M3	03/10/2015	1,500.00	ENNOVVA INC.	100 N BISCAYNE BLVD, SUITE 2906	MIAMI, FL 33132	WEB DESIGN
2015	M3	03/10/2015	3,580.00	ENNOVVA INC.	100 N BISCAYNE BLVD, SUITE 2906	MIAMI, FL 33132	ADVERTISING PRODUCTION
2015	M3	03/10/2015	350.00	RODRIGUEZ, TRUEBA & CO., CPA	1985 NW 88TH COURT, SUITE #101	DORAL, FL 33172	ACCOUNTING & REPORTING SERVICES
2015	M3	03/17/2015	10,000.00	BRIAN ANDREWS USA, LLC	255 MOCKINGBIRD TRAIL	PALM BEACH, FL 33480	MARKETING CONSULTING
2015	M3	03/23/2015	5,000.00	REGALADO JOSE F.	2424 SW 20TH STREET	MIAMI, FL 33145	SOCIAL MEDIA
			20,430.00				

5 Expenditure(s) Selected

Query the Campaign Finance Data Base

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

EXHIBIT



ATTORNEYS AT LAW

September 4, 2015

Via Certified Mail Return Receipt Requested

Erin Riley  
Deputy Agency Clerk  
Florida Elections Commission  
107 W. Gaines Street  
Suite 224  
Tallahassee, FL 32399

Re: Case No.: FEC-15-372; Respondent: Raquel Regalado

Ms. Riley:

This correspondence is in response to the letter from the Florida Elections Commission ("FEC") dated June 30, 2015 (the "FEC Letter"). Ms. Regalado has addressed all of the issued and concerns found in the FEC Letter. Please see Ms. Regalado's response to the FEC Letter, attached hereto. If you have any questions, please contact me directly at 305.377.1000.

Sincerely,

A handwritten signature in black ink, appearing to read 'Roland Sanchez-Medina, Jr.'.

Roland Sanchez-Medina, Jr.

el:RSM

Copy to: Raquel Regalado (Via E-mail)  
Michael Montiel

EXHIBIT 5 page 1 of 3

## RAQUEL REGALADO'S RESPONSE TO THE FEC LETTER

Serving Miamians, an Electioneering Communications Organization ("ECO") mistakenly engaged Ennovva, Inc (the "Vendor") to design the website for www.raquelregalado.com (the "Website"). Serving Miamians contacted the Vendor regarding this error in order to take steps to correct the error. The Vendor has since returned the funds to Serving Miamians. The refund will be reflected in the September ECO report and will be provided to the FEC. Furthermore, Ms. Regalado's campaign account has since paid the Vendor for the work performed, as well as an extra fee for changing the disclaimers on the video found on the Website, and removing all references to Serving Miamians, both on the Website and in the video. This will also be reflected in Ms. Regalado's September campaign report which will be provided to the FEC when it is due on October 10, 2015. Some of the confusion in connection with the error was likely caused by the fact that Serving Miamians intended to engage the Vendor to create videos which are in furtherance of its purpose as an ECO.

The Website, although "live" on March 9, 2015, was never fully completed by the Vendor. In fact, the Vendor's bill for the creation of the Website indicates that the Website was still currently under construction at the time it went "live". As such, it was never the intention of Serving Miamians, nor Ms. Regalado, for the Website to be accessed by visitors, nor to serve as a campaign advertisement for Ms. Regalado's campaign. The Website was simply a "landing page" as opposed to an advertised or marketed website.

Currently, the Website is offline and any visitors will find a message which states that the Website is under construction. The video which was previously featured on the Website is no longer accessible. Please see the screenshot of the Website attached hereto.

As referenced above, Serving Miamians intends to continue to engage the Vendor for the creation of additional videos which fully comply with Florida law. Despite Serving Miamians' unintentional mistake described above, moving forward Serving Miamians will continue to exist as an ECO. As the mistake has been corrected, Serving Miamians does not need to, and will not, register as a Political Committee. All acts undertaken by Serving Miamians in the future will be fully in accordance with its purpose as an ECO, in accordance with Florida law.

F:\General Clients\Raquel Regalado\RegaladoResponseToFEC.docx

EXHIBIT 5 page 2 of 3



www.raquelregalado.com



UNDER CONSTRUCTION


*Exhibit 5, page 7 of 3*



Ennova, Inc  
100 Biscayne Blvd Suite 2906  
Miami, FL 33132

1168  
63-1145 670

09/25/15  
Date

Pay to the Order of Serving Miamians \$ 5,080  
Five thousand eighty 00/100 Dollars  Security Features Details on Back

Helm Bank  
999 Brickell Ave  
Miami, FL 33131


*Agnes Lewis*

For




*Refund  
Advertising production*



"SERVING MIAMIANS ECO" 1985 NW 88TH CT #101 MIAMI, FL 33172-2648		CITY NATIONAL BANK www.citynational.com	1146 63-438/660
		3/10/2015	
PAY TO THE ORDER OF	Ennovva Inc.	\$	**3,580.00
Three Thousand Five Hundred Eighty and 00/100*****			DOLLARS
Ennovva Inc. 100 N Biscayne Blvd. Suite 2906 Miami, FL 33132			
MEMO	Invoice #0438	[REDACTED] <small>ED SIGNATURE</small>	

1146 \$3,580.00 3/13/2015



CITY NATIONAL BANK www.citynational.com		1145 13 436 540
*SERVING MIAMIANS ECO* 1985 NW 88TH CT #101 MIAMI, FL 33172-2648		
3/10/2015		
PAY TO THE ORDER OF	Ennovva Inc	\$ **1,500.00
One Thousand Five Hundred and 00/100		DOLLARS
Ennovva Inc 100 N Biscayne Blvd Suite 2906 Miami, FL 33132		
MEMO	Invoice #0437	
		SECURITY FEATURES INCLUDING

1145 \$1,500.00 3/13/2015

# CAMPAIGN TREASURER'S REPORT SUMMARY

(1) Raquel A. Regalado  
 Name  
 (2) 1850 SW 36th Avenue  
 Address (number and street)  
Miami, FL 33145  
 City, State, Zip Code

**OFFICE USE ONLY**  
**ONLINE SUBMISSION**  
 [1086828]

Submitted on:  
 4/8/2015 11:34:17 (eastern)

☐ Check here if address has changed

(3) ID Number: 1421

(4) Check appropriate box(es):

☒ Candidate Office Sought: Mayor

☐ Political Committee (PC)

☐ Electioneering Communications Org. (ECO)

☐ Party Executive Committee (PTY)

☐ Independent Expenditure (IE) (also covers an individual making electioneering communications)

☐ Check here if PC or ECO has disbanded

☐ Check here if PTY has disbanded

☐ Check here if no other IE or EC reports will be filed

## (5) Report Identifiers

Cover Period: From 3 / 1 / 2015 To 3 / 31 / 2015 Report Type: 15M03

☒ Original

☐ Amendment

☐ Special Election Report

## (6) Contributions This Report

Cash & Checks \$ 48,310.00

Loans \$ 0.00

Total Monetary \$ 48,310.00

In-Kind \$ 0.00

## (7) Expenditures This Report

Monetary Expenditures \$ 0.00

Transfers to Office Account \$ 0.00

Total Monetary \$ 0.00

## (8) Other Distributions

\$ 0.00

## (9) TOTAL Monetary Contributions To Date

\$ 48,310.00

## (10) TOTAL Monetary Expenditures To Date

\$ 0.00

## (11) 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:

(Type name)

☐ Individual (only for IE or electioneering comm.) ☐ Treasurer ☐ Deputy Treasurer

**X**

Signature

(Type name)

☐ Candidate ☐ Chairperson (only for PC and PTY)

**X**

Signature

# CAMPAIGN TREASURER'S REPORT - ITEMIZED CONTRIBUTIONS

(1) Name Raquel A. Regalado (2) I.D. Number 1421

3/1/2015 3/31/2015  
(3) Cover Period 3/1/2015 through 3/31/2015 (4) Page 1 of 16

(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Contributor Type Occupation	(9) Contribution Type	(10) In-kind Description	(11) Amendment	(12) Amount
(6) Sequence Number						
3/12/2015 / /	Regalado, Tomas P 2424 SW 20th Street Miami, FL 33145	I city of miami mayor	CH			\$250.00
1						
3/20/2015 / /	Fourth Amended & Restated , Declaration 2060 Biscayne Blvd 2nd Floor Miami, FL 33137	B real estate	CH			\$1,000.00
2						
3/20/2015 / /	Braman, Norman 2060 Biscayne Blvd Miami, FL 33137	I auto dealer	CH			\$1,000.00
3						
3/20/2015 / /	Braman, Irma 2060 Biscayne Blvd Miami, FL 33137	I homemaker	CH			\$1,000.00
4						
3/20/2015 / /	Braman Cadillac Inc., 2060 Biscayne Blvd Miami, FL 33137	B auto dealer	CH			\$1,000.00
5						
3/20/2015 / /	Braman Auto, Inc., 2060 Biscayne Blvd Miami, FL 33137	B auto dealer	CH			\$1,000.00
6						
3/20/2015 / /	Braman Hyundai, 2060 Biscayne Blvd Miami, FL 33137	B auto dealer	CH			\$1,000.00
7						
3/20/2015 / /	Braman Motors, 2060 Biscayne Blvd Miami, FL 33137	B auto dealer	CH			\$1,000.00
8						

## CAMPAIGN TREASURER'S REPORT SUMMARY

(1) Raquel A. Regalado

Name

(2) 1850 SW 36th Avenue

Address (number and street)

Miami, FL 33145

City, State, Zip Code

☐ Check here if address has changed

(3) ID Number: 1421

OFFICE USE ONLY  
ONLINE SUBMISSION  
[1092635]

Submitted on:

10/13/2015 09:49:21 (eastern)

(4) Check appropriate box(es):

☒ Candidate Office Sought: Mayor

☐ Political Committee (PC)

☐ Electioneering Communications Org. (ECO)

☐ Party Executive Committee (PTY)

☐ Independent Expenditure (IE) (also covers an individual making electioneering communications)

☐ Check here if PC or ECO has disbanded

☐ Check here if PTY has disbanded

☐ Check here if no other IE or EC reports will be filed

### (5) Report Identifiers

Cover Period: From 9 / 1 / 2015 To 9 / 30 / 2015 Report Type: 15M09

☒ Original

☐ Amendment

☐ Special Election Report

### (6) Contributions This Report

Cash & Checks \$ , 4 , 455 . 00

Loans \$ , , 0 . 00

Total Monetary \$ , 4 , 455 . 00

In-Kind \$ , , 0 . 00

### (7) Expenditures This Report

Monetary Expenditures \$ , 15 , 402 . 70

Transfers to Office Account \$ , , 0 . 00

Total Monetary \$ , 15 , 402 . 70

### (8) Other Distributions

\$ , , 0 . 00

### (9) TOTAL Monetary Contributions To Date

\$ , 208 , 565 . 00

### (10) TOTAL Monetary Expenditures To Date

\$ , 23 , 704 . 16

### (11) 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:

(Type name)

☐ Individual (only for IE or electioneering comm) ☐ Treasurer ☐ Deputy Treasurer

X

Signature

(Type name)

☐ Candidate ☐ Chairperson (only for PC and PTY)

X

Signature

# CAMPAIGN TREASURER'S REPORT - ITEMIZED CONTRIBUTIONS

(1) Name Raquel A. Regalado (2) I.D. Number 1421

9/1/2015 9/30/2015  
(3) Cover Period 9/1/2015 through 9/30/2015 (4) Page 1 of 2

(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Contributor Type Occupation	(9) Contribution Type	(10) In-kind Description	(11) Amendment	(12) Amount
9/28/2015 / /	Wolfson, Ellen D 9595 Journeys End Lane Coral Gables, FL 33156	I homemaker	CH			\$1,000.00
1						
9/28/2015 / /	Wolfson III, Louis 9595 Journeys End Lane Coral Gables, FL 33156	I developer	CH			\$1,000.00
2						
9/28/2015 / /	Naulilus Spearfishing Corp., 6464 West Flagler Street Coral Gables, FL 33144	B dive shop	CH			\$5.00
3						
9/28/2015 / /	1250 Garcia Investments, LLC, PO Box #16123 Miami, FL 33116	B real estate	CH			\$100.00
4						
9/28/2015 / /	Caribe Cafe Restaurant, Inc., 3953 NW 7th Street Miami, FL 33126	B restaurant	CH			\$400.00
5						
9/28/2015 / /	Caribe Restaurant, Inc., 7169 West Flagler Street Miami, FL 33144	B restaurant	CH			\$400.00
6						
9/30/2015 / /	Herrera Tire Service, Inc., 2701 NW 7th Avenue Miami, FL 33127	B tire services	CH			\$300.00
7						
9/30/2015 / /	Molina Towing Inc., 2115 NW 7th Avenue Miami, FL 33127	B towing services	CH			\$500.00
8						

# CAMPAIGN TREASURER'S REPORT - ITEMIZED CONTRIBUTIONS

(1) Name Raquel A. Regalado (2) I.D. Number 1421

9/1/2015 9/30/2015

(3) Cover Period 9/1/2015 through 9/30/2015 (4) Page 2 of 2

(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Contributor Type Occupation		(9) Contribution Type	(10) In-kind Description	(11) Amendment	(12) Amount
9/30/2015 / /	Kaloti Metals & Logistics, 55 NE 1st Street Unit 34 Miami, FL 33132	B	logistics	CH			\$750.00
9							
/ /							
/ /							
/ /							
/ /							
/ /							
/ /							

# CAMPAIGN TREASURER'S REPORT – ITEMIZED EXPENDITURES

(1) Name Raquel A. Regalado

(2) I.D. Number 1421

9/1/2015

9/30/2015

(3) Cover Period 9/1/2015 through 9/30/2015

(4) Page 1 of 2

(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Purpose (add office sought if contribution to a candidate)	(9) Expenditure Type	(10) Amendment	(11) Amount
9/4/2015 / /	Mario's Kids Photo Studio, 1601 Le Jeune Rd Coral Gables, FL 33134	photography	MO		\$1,388.75
1					
9/11/2015 / /	Rodriguez Trueba & Co. CPA, 1985 NW 88th Court Suite 101 Doral, FL 33172	accounting & reporting services	MO		\$1,275.00
2					
9/12/2015 / /	Newwegg Business, 17560 Rowland Street City of Industry, CA 91748	check voided	MO		\$-1,566.05
3					
9/15/2015 / /	Borcegue, Juan 541 SW 42nd Avenue Apt 126 Miami, FL 33134	campaign work	MO		\$500.00
4					
9/24/2015 / /	Outfront Media, 8530 NW 23rd Street Doral, FL 33122	outdoor advertising	MO		\$7,500.00
5					
9/24/2015 / /	Outfront Media, 8530 NW 23rd Street Doral, FL 33122	advertising production	MO		\$525.00
6					
9/25/2015 / /	Ennovva, Inc., 100 N Biscayne Blvd Suite 2906 Miami, FL 33132	web design	MO		\$1,500.00
7					
9/25/2015 / /	Ennovva, Inc., 100 N Biscayne Blvd Suite 2906 Miami, FL 33132	advertising production	MO		\$3,780.00
8					

DS-DE 14 (Rev. 11/13 )

SEE REVERSE FOR INSTRUCTIONS AND CODE VALUES

EXHIBIT 2 page 4 of 5



# CAMPAIGN TREASURER'S REPORT – ITEMIZED EXPENDITURES

(1) Name Raquel A. Regalado

(2) I.D. Number 1421

9/1/2015

9/30/2015

(3) Cover Period 9/1/2015 through 9/30/2015

(4) Page 2 of 2

(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Purpose (add office sought if contribution to a candidate)	(9) Expenditure Type	(10) Amendment	(11) Amount
9/25/2015 / /	Borcegue, Juan 541 SW 42nd Avenue Apt 126 Miami, FL 33134	campaign work	MO		\$500.00
9					
/ /					
/ /					
/ /					
/ /					
/ /					
/ /					
/ /					
/ /					

COUNTDOWN TO ELECTION DAY

221 14 46 13

DAYS

HOURS

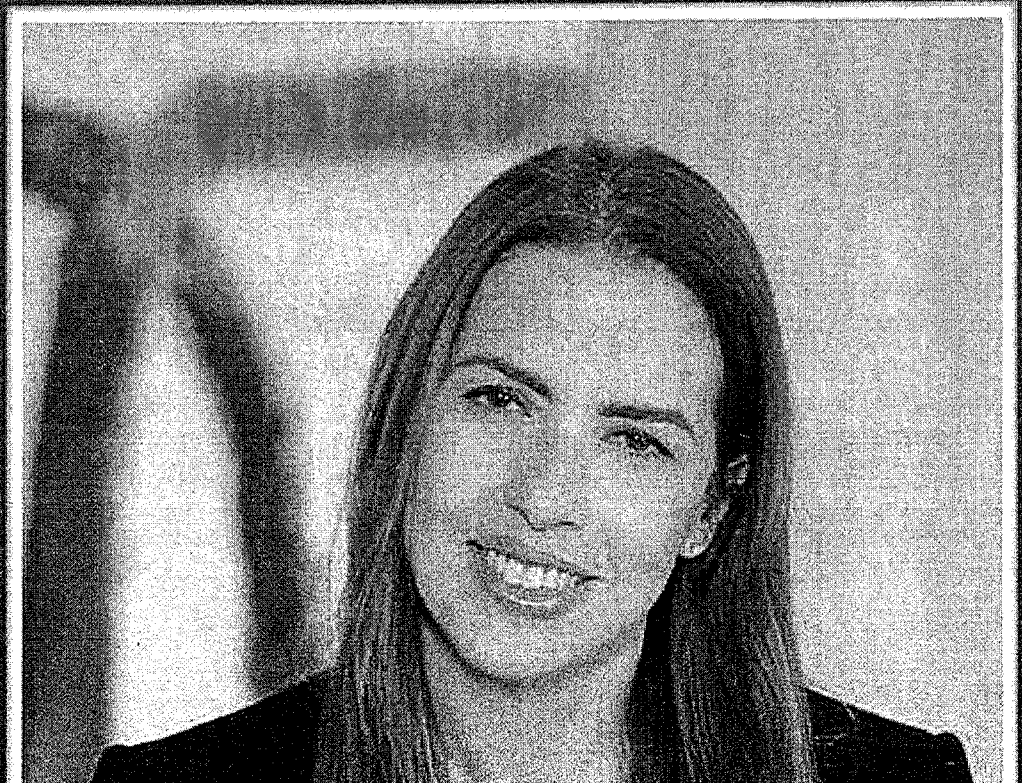
MINUTES

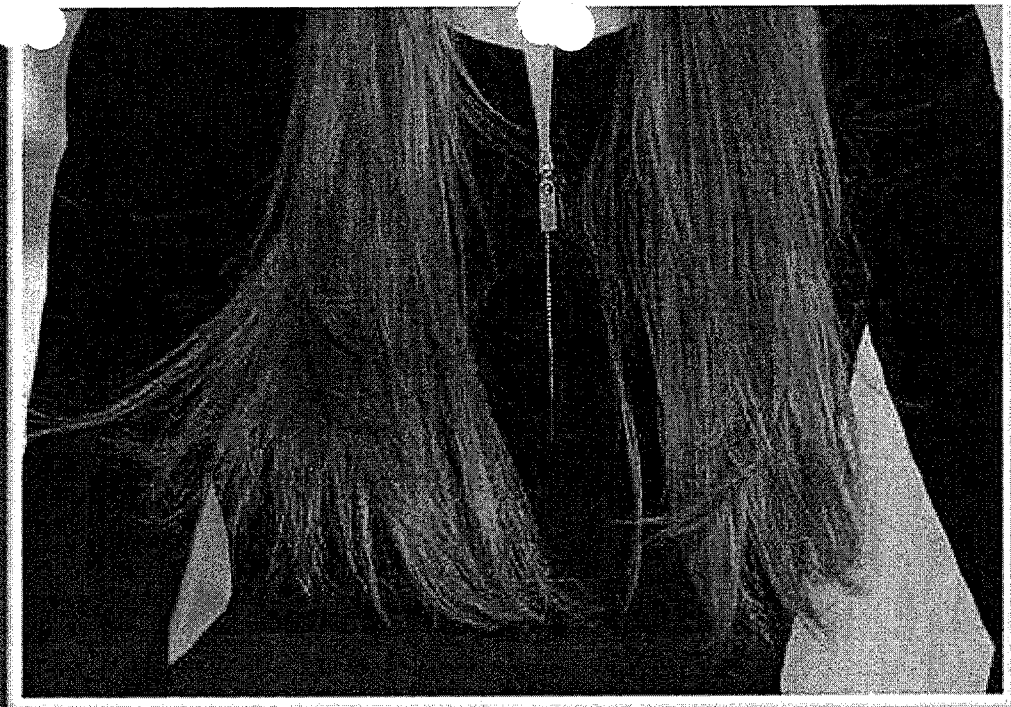
SECONDS

August 30<sup>th</sup>, 2016

**RAQUEL  
REGALADO**

**FOR MIAMI-DADE COUNTY MA**





**OUR FUTURE  
BEGINS AUGUST 201**

---

**RAQUELREGALADO.COM**

**PAID & APPROVED BY RAQUEL REGALADO CAMPAIGN**





ATTORNEYS AT LAW

May 31, 2016

2016 JUN -1 P 12:43

Via E-Mail

Margie B. Wade  
Investigation Specialist II  
Florida Elections Commission  
107 West Gaines Street, Suite 224  
Tallahassee, FL 32399

Re: FEC 15-372

Dear Ms. Wade:

This office represents Ms. Raquel Regalado. Please find attached the affidavits requested in connection with the above-referenced matter.

In addition to the attached affidavits, it is important to clarify a number of items. The website described in the affidavits, [www.raquelregalado.com](http://www.raquelregalado.com) (the "Website"), was simply a "landing" website. In other words, there was no content available to be viewed on this website. During the time that the video referenced in the affidavits was erroneously uploaded to the Website, the Website was currently under construction and not a finished product.

The contract between Serving Miamians and Ennova, Inc., attached hereto, references payment in the amount of 50% of the invoice upon execution of the contract, and 50% payment upon completion of the Website. At the time the video was posted, the final 50% had not been paid, as work on the Website was still ongoing. Neither Ms. Regalado nor Serving Miamians had been advertising the Website. In fact, it was not intended that the Website be viewed by any visitors at the time the video was posted.

If you have any questions or require additional information, please do not hesitate to contact me directly at 305.377.1000. Thank you for your time and attention.

Sincerely,

Michael Montiel

MM; ka

Encls.

Copy to: Raquel Regalado, Esq.  
Roland Sanchez-Medina Jr., Esq.

AFFIDAVIT OF BACKGROUND INFORMATION  
Case Number: FEC 15-372

STATE OF FLORIDA  
County of Miami-Dade

Raquel Regalado, 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 Miami-Dade County Public Schools as School Board Member.

3. Have you ever run for public office? If so, please name the office(s) you ran for and the date(s) of the election(s) you ran in.

Yes, I ran for School Board Member in 2010. I was elected for a four (4) year term, and I ran again for re-election in 2014. I was re-elected to a second four (4) year term.

4. Have you ever been appointed to act as a campaign treasurer for a candidate? If so, please name the candidate(s) you served as treasurer, the office(s) the candidate ran for, and the dates of the election(s).

Yes, I was campaign treasurer for Tomas Regalado's mayoral campaign in 2008.

5. Have you ever held the office of chairperson, treasurer, board member, or other similar position for a political committee? If so, please list the names and addresses of the committees and dates when you held the position.

No.

6. Have you ever prepared or signed a campaign treasurer's report? If so, please list the name of the candidate or committee whose report you prepared or signed.

Yes, as campaign treasurer for Tomas Regalado's mayoral campaign in 2008.

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

I am a constitutionally elected official.

8. Do you possess a copy of Chapter 106, Florida Statutes? ☒ Yes ☐ No

9. If so, when did you first obtain it? 2010, 2014, and 2015.

10. Have you read Chapter 106, Florida Statutes? ☒ Yes ☐ No

11. Do you possess a copy of Chapter 104, Florida Statutes? ☒ Yes ☐ No

12. If so, when did you first obtain it? 2010.

13. Have you read Chapter 104, Florida Statutes? ☒ Yes ☐ No

14. Do you possess a copy of the *Handbook for Candidates*? ☒ Yes ☐ No

EXHIBIT 11 page 2 of 5  
1

15. If so, when did you first obtain it? 2010.

16. Have you read the *Handbook for Candidates*?

☒ Yes ☐ No

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

None at this time.

18. Please describe your communication with the officers and members of Serving Miamian regarding the creation and "launching" of the website and video. Please include the time and place the communications occurred. If there were any written communications, please provide copies.

None.

*These questions below pertain to the campaign website.*

19. Did you review the website before it became "live"?

No, I did not review the website before it became "live".

20. Did you approve the website before it became "live"?

No, I did not approve the website before it became "live".

21. When did you become aware of the website?

I became aware of the website upon receipt of the letter from the Florida Elections Commission dated June 30, 2015.

22. How did you become aware of the website?

I became aware of the website upon receipt of the letter from the Florida Elections Commission dated June 30, 2015.

23. According to the written response submitted by your attorney, it was not intended for the website to be accessed by visitors. What did you and/or your campaign do to prevent visitors from accessing the website?

The Website had not been approved or reviewed at the time it went "live". Neither I nor my campaign had been advertising the Website. The Website was not intended to be viewed by any visitors during the time the video was posted. Upon receipt of the letter from the Florida Elections Commission dated June 30, 2015, I contacted Ennova, Inc. and demanded that the video and the website be taken offline immediately.

*The questions below pertain to the video.*

24. Did you review the video before it was posted on the website?

No, though I appear in the video, I had not reviewed the final product.

25. Did you approve the video before it was posted on the website?

No, I had not reviewed the final product. Furthermore, it was not my position to approve the posting of the video.


26. When did you become aware of the video?

I became aware of the video, with respect to its posting on the website, upon receipt of the letter from the Florida Elections Commission dated June 30, 2015.


27. How did you become aware of the video?

I became aware of the video, with respect to its posting on the website, upon receipt of the letter from the Florida Elections Commission dated June 30, 2015.

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 24<sup>TH</sup> day of  
MAY, 2016

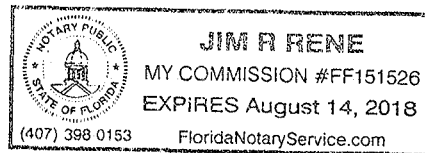
  
Signature of Notary Public - State of Florida

Print, Type, or Stamp Commissioned Name of Notary Public

Personally Known \_\_\_\_\_ or Produced Identification ☒

Type of Identification Produced: FLORIDA DRIVERS  
LICENSE

Case Investigator: MBW



EXHIBIT

11 page 5 of 5



AFFIDAVIT OF ADDITIONAL INFORMATION

Case Number: FEC 15-372

STATE OF FLORIDA                     )  
COUNTY OF MIAMI-DADE            )

ROLAND SANCHEZ-MEDINA JR., being duly sworn, says:

1. This affidavit is made upon my personal knowledge.
2. I am of legal age, *sui juris* and competent to testify to the matters stated herein. I am currently employed by Sanchez-Medina, Gonzalez, Quesada, Lage, Gomez & Machado, LLP as an attorney.
3. My telephone number is 305-377-1000, Ext. 108.
4. According to the information disclosed on your 2015 M3 Report, you made an expenditure to Ennova, Inc. for "Web design." Please provide copies of the artwork and invoice for the web design.

Copies of the artwork and invoice for the web design are attached.

5. According to the information disclosed on your 2015 M3 Report, you made an expenditure to Ennova, Inc. for "advertising." Please provide copies of the advertising and the invoices.

No expenditure was made to Ennova, Inc. for advertising. The attached invoice was limited to web design and the creation of one video.

*The following questions pertain to Attachment A.*

6. The disclaimer on the web site states, "Paid and approved by Serving Miamians." Please provide the name and contact information for the person responsible for the verbiage in the disclaimer.

No disclaimer was provided to Ennova, Inc. The disclaimer language was created by Ennova, Inc. as a result of the execution of the contract between Serving Miamians and Ennova, Inc.

7. Please provide the name and contact information for the person responsible for verbiage on the web site.

Amelie Ferro. She may be contacted at 305-938-0728.

8. Please provide the name and contact information for the person that reviewed and approved the web site and the person that reviewed and approved the video.

The Website had not been approved or reviewed. As referenced in the letter above, the website was in a period of initial construction and was not intended to go "live" at the time of the posting of the video. The Website was not completed and no content was available on the

EXHIBIT 12 page 1 of 3

Website. To my knowledge, Ennova, Inc. was in the process of testing the design and connectivity of the website at the time the video was erroneously uploaded.

9. Please provide the invoices for the web site and video that appears on the web site.

The invoices are attached hereto.

10. Please provide a copy of the payment instruments for the web site and the video.

The payment instruments are attached.

11. Please provide a copy of the video.

I am not in possession of the video, though I am attempting to obtain a copy from Ennova, Inc.

12. Was Ms. Regalado aware that your published the web site? ( ) Yes (X) No

To the best of my knowledge, Ms. Regalado was unaware that the Website was "live" and published

13. Did any officer or member of Serving Miamians discuss the web site with Ms. Regalado?  
No.

If so, please provide the name(s) and contact information for each person that communicated with Ms. Regalado. Not applicable.

14. Did Ms. Regalado provide the information for the web site? ( ) Yes (X) No

There was no information on the Website.

15. Did Ms. Regalado review the web site? ( ) Yes (X) No

16. Did Ms. Regalado review the video? ( ) Yes (X) No

17. Did Ms. Regalado approve the web site? ( ) Yes (X) No

18. Please explain why Serving Miamians published the website?

Serving Miamians was in the process of publishing a new website about Raquel Regalado in conformity with IRS rules and regulations. Serving Miamians has been informing Miami-Dade County residents regarding Raquel Regalado and Tomas Regalado for five (5) years. The language included in the video requesting support for Ms. Regalado was simply a mistake, as the intent of the video was to educate Miami-Dade County regarding various issues. The video was immediately removed from the Website.

EXHIBIT 12 page 2 of 3

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

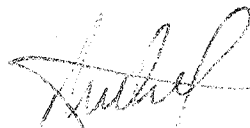


Signature of Affiant

Sworn to (or affirmed) and subscribed before me  
this 31<sup>st</sup> day of May, 2016



MICHAEL A. MONTIEL  
MY COMMISSION # FF 923292  
EXPIRES: October 1, 2019  
Bonded Thru Budget Notary Services



Signature of Notary Public - State of Florida

Print, Type, or Stamp Commissioned Name of  
Notary Public

Case Investigator: MBW

EXHIBIT 12 page 3 of 3



February 25, 2015

We are thrilled to assist with your production needs. Below please find two options. Both include the different needs we discussed. In the first option I have also included as a value added the use of our studio for your campaign commercials as well as the ability to perform live streaming with interaction from third parties. This may be very interesting for any kind of survey and to increase engagement with your constituents.

**Option 1: All Inclusive**

Service
Unlimited Monthly Access to Studio Facility and Production Team Unlimited Access for:
Short format segments with director and editors that provide all post-production work.
Digital Platform Live Streaming with interaction of unlimited concurrent users.
Production of Campaign Commercials. (Studio Use)
Design of Website
Hosting of Website and a secured FTP server
Video Platform Sites: Development of YouTube branded channel with campaign website color and image theme and the publishing all productions on platform.
Monthly Fee: \$10,000

**Option 2: Per Usage**

Service	Full Day	Half Day
Studio, camera lighting and audio equipment, camera operator, fiber line	\$1,400	\$1,080
Editing, Grafic Package and Post Production	\$600	\$500
Publish productions on company website, secure FTP, social media & video platforms	\$20 per production	
Design of Website	\$3,000	
Hosting of Website and a secured FTP server	\$40 a month	
Access to Live Streaming with Interaction of Unlimited and Concurrent Users	TBD	
Access to Studio Facility for Campaign Commerical Production	TBD	

I look forward to seeing you tomorrow and continuing to explore opportunities to work together!

Best,

Amelie Ferro

www.CIMACAST.com

100 N Biscayne Boulevard Suite 2906 Miami Florida 33132

EXHIBIT 13 page 1 of 3

# INVOICE



ENNOVVA INC.  
100 N Biscayne Blvd, Suite 2906  
Miami, FL 33132  
Phone: (855) 366 6882  
EIN 45-3765499

Invoice No.	Date
0438	3/6/2015

<b>Bill To</b>
Servings Miamians

<b>Ship To</b>

PO No.	Terms	Due Date
	Upon Receipt	3/6/2015

Quantity	Description	Amount	Total USD
1 Full day	February 26, 2015 and March 5, 2015 Studio, camera lighting and audio equipment, camera operator, fiber line Editing, graphic package and postproduction	\$ 1,400.00 \$ 600.00	\$ 1,400.00 \$ 600.00
1/2 Day	March 6, 2015 Studio, camera lighting and audio equipment, camera operator, fiber line Editing, graphic package and postproduction	\$ 1,080.00 \$ 500.00	\$ 1,080.00 \$ 500.00
Please make payments to: ENNOVVA INC. 100 N. Biscayne Blvd. Suite 2906 Miami, FL 33132			
		<b>TOTAL USD</b>	<b>\$ 3,580.00</b>

# INVOICE

ENNOVVA INC.  
100 N Biscayne Blvd, Suite 2906  
Miami, FL 33132  
Phone: (855) 366 6882  
EIN 45-3765499

e-n-n-o-v-v-a

Invoice No.	Date
0437	3/6/2015

<b>Bill To</b>
Servings Miamians

<b>Ship To</b>

PO No.	Terms	Due Date
	Upon Receipt	3/6/2015

Quantity	Description	Amount	Total USD
	Web Design	\$ 3,000.00	\$ 3,000.00
	50% due upon receipt of invoice		
	50% Due at completion of website		
	Please make payments to: ENNOVVA INC. 100 N. Biscayne Blvd. Suite 2906 Miami, FL 33132		
		<b>DUE NOW</b>	<b>\$1,500.00</b>
		<b>BALANCE</b>	<b>\$ 1,500.00</b>

EXHIBIT 13 page 3 of 3

Regalado website  
Margie Wade to aferro

06/01/2016 04:25 PM

Dear Ms. Ferro,

As we discussed in our earlier telephone conversation, when I reviewed the initial website, [www.raquelregalado.com](http://www.raquelregalado.com), the site appears to be a website for Ms. Regalado's mayoral campaign but the disclaimer reads, "Paid and approved by Serving Miamians." I need to know the following:

1. Who contacted your company to produce the website?
2. Who contacted your company to produce the video on the website?
3. Was the website Ms. Regalado's website or Serving Miamians' website?
4. Who decided what content the website would contain?
5. Who decided on the verbiage used in the disclaimer?
6. What instructions, if any, were you given regarding the content of the website?
7. When was the website scheduled to be accessible to the public?
8. How was Ms. Regalado involved in the design/production of the website?
9. Did Ms. Regalado review the website? If so, how do you know that she reviewed the website?
10. Did Ms. Regalado review the video? If so, how do you know that she reviewed the video?
11. When (on what date) was the website completed and ready for public viewing?

*Margie B. Wade*

Investigation Specialist II  
Florida Elections Commission  
107 West Gaines Street, Suite 224  
Tallahassee, FL 32399  
850-922-4539 (phone)  
850-921-0783 (fax)

Check #: 1145 for \$1,500.00 Posted: 3/13/2015

Check #: 1145 for \$1,500.00 Posted: 3/13/2015



<p><b>"SERVING MIAMIANS ECO"</b>          1985 NW 88TH CT #101          MIAMI, FL 33172-2648</p>		<p>CITY NATIONAL BANK          www.citynational.com</p>	<p>1146          63-438/660</p>
		<p>3/10/2015</p>	
<p>PAY TO THE ORDER OF</p>	<p>Ennovva Inc.</p>	<p>\$ 3,580.00</p>	<p>Details on Back</p> <p>Security Features Included</p>
<p>Three Thousand Five Hundred Eighty and 00/100</p>		<p>DOLLARS</p>	
<p>Ennovva Inc.          100 N Biscayne Blvd.          Suite 2906          Miami, FL 33132</p>		<p><i>[Signature]</i>          AUTHORIZED SIGNATURE</p>	
<p>MEMO</p>	<p>Invoice #0438</p>		

Check #: 1146 for \$3,580.00 Posted: 3/13/2015

6/9/2016

Page 2

<p><i>[Redacted]</i></p>	<p><i>[Redacted]</i></p>	<p>Ennovva, Inc.</p>
--------------------------	--------------------------	----------------------


Check #: 1146 for \$3,580.00 Posted: 3/13/2015

Ennovva, Inc  
100 Biscayne, Blvd. Suite 2906  
Miami, FL 33132


1168  
63-1145/670

09/25/15  
Date

Pay to the Order of Serving Miamians \$ 5,080.  
Five thousand eighty 00/100 Dollars

 Security Features  
Orange or  
Gold

Helm Bank  
999 Brickell Ave  
Miami, FL 33131

For \_\_\_\_\_  


*John Lewis*

Transit - 10/1/2015

PAY TO THE ORDER OF  
 CITY NATIONAL BANK  
 MIAMI, FL 33186-1302  
 066004367  
 FOR DEPOSIT ONLY  
 SER [REDACTED] CO  
 CNB [REDACTED]  
 Doral [REDACTED]  
 2015-10-01 [REDACTED]

Transit - 10/1/2015

DATE 9/28/15

"SERVING MIAMIANS ECO"  
1985 NW 88TH CT #101  
MIAMI, FL 33172-2648

CITY NATIONAL BANK  
www.citynational.com

\$

5080.00

DATE	DOLLARS	CENTS
CURRENCY		
COINS		
TOTAL CASH		
CHECKS		
\$ 1168	5080	00
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
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19		
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22		
23		
24		
25		
26		
27		
28		
TOTAL FROM OTHER SIDE OF ATTACHED LIST		
PLEASE RE-ENTER TOTAL HERE	5080	00

DEPOSIT  
TICKET

TOTAL ITEMS

1

DEPOSITS MAY NOT  
BE AVAILABLE FOR  
IMMEDIATE WITHDRAWAL

63-436/660

RE-ENTER GRAND TOTAL  
IN SCREENED BOXES

USE ROUTING NUMBER FROM YOUR CHECKS FOR AUTOM.

AND ANY APPLICABLE COLLECTION AGREEMENT

DDA Credits - 10/1/2015

2015  
EXHIBIT 15 page 3 of 3

# AFFIDAVIT OF FILING OFFICER

Case Number: FEC 15-372

RECEIVED

1. Please provide certified copies of the listed items from the following candidate's campaign file:  
Raquel Regalado.

Check	ITEM
✓	The Statement of Candidate form for 2016. <i>(Statement of Candidate provided was signed on 03/09/15)</i>
✓	Appointment of Treasurers and Designation of Campaign Depository form for 2016. <i>(Appointment of Campaign Treasurer and Designation of Campaign Depository provided was signed on 03/09/15)</i>
✓	2015 M3, M4, and M5 Reports <i>(attached)</i>
✓	Un-redacted copies of any checks issued to your office. <i>(N/A – Payment to the Elections Department is due at the time of qualifying in June 2016.)</i>
✓	Statements of financial interest (Form 1 and Form 6) for 2016. <i>(N/A – The required Statement of Financial Interest is due at the time of qualifying in June 2016.)</i>

2. Please check each item provided to the candidate or his or her staff, and list the date that the item was provided. (If the item is published by the Division of Elections, it is unnecessary to provide a copy of the item. If your office published the item, please send a copy of the item with this affidavit.)

Check	ITEM	DATE
✓	Chapter 106, Florida Statutes <i>(Provided to the candidate as part of A Compilation of The Election Laws of the State of Florida. Link to this page is found in the Elections Department website in Candidate Qualifying Handbook.)</i>	03/09/15
✓	Chapter 104, Florida Statutes <i>(Provided to the candidate as part of A Compilation of The Election Laws of the State of Florida. Link to this page is found in the Elections Department website in Candidate Qualifying Handbook.)</i>	03/09/15
✓	Candidate Handbook Please indicate Year – <i>(2016 Candidate Qualifying Handbook.)</i>	03/09/15
✓	Political ad and disclaimer supplement <i>(Provided as part of the 2016 Candidate and Campaign Treasurer Handbook. Link to this page is found in the Elections Department website in Candidate Qualifying Handbook.)</i>	03/09/15
✓	Calendar of Election dates <i>(Calendar of Election Dates is available on the Elections Department website. Calendar of Reporting Dates was provided to the candidate as an attachment to the Acknowledgement Letter dated 03/16/15; and as part of the e-mail to candidates dated 12/28/15). In addition, the Calendar of Reporting Dates can be found in the Election Department's website in Candidate Qualifying Handbook.)</i>	03/09/15; 03/16/15; and 12/28/15
✓	Any other election related document, Please indicate the title of the related document <i>(Guidelines to a Successful Campaign Report was provided to the candidate along with the Acknowledgement Letter.)</i>	03/16/15

3. Please list all other written materials provided to the candidate or his or her staff, the date of receipt, and a brief description of the written materials. Did you notify the candidate that the campaign handbook was available on the Division of Elections website?

The following written materials were provided: Acknowledgement Letter dated 03/16/15; Incomplete Report letter for 15-M03 dated 04/08/15 and delivered 04/13/15; E-mail regarding campaign reporting dates sent on 12/28/15.

The candidate was notified that the campaign handbook was available on the Division of Elections website through submittal of the MD-ED 2 "Access to Handbook and the Election Laws of the State of Florida" (attached).

This information is also provided to the candidate via the Candidate Qualifying Handbook and the Qualifying Information Handbook package for Mayoral Candidates 2016)

4. Please list all training seminars that were attended by the candidate, along with the date of attendance. If a staff member attended for the candidate, list his name and position. If available, please attach a copy of any attendance sheets from the seminar(s).

N/A. Please refer this question to the Miami-Dade County Commission on Ethics and Public Trust as they coordinate candidate trainings.

5. Please list the subjects covered during these seminars. If available, please provide a copy of the syllabus and outline for the seminar.

N/A. Please refer this question to the Miami-Dade County Commission on Ethics and Public Trust as they coordinate candidate trainings. The Elections Department covers a portion of the training relating to becoming a candidate; campaign financing; legislative changes; and other information.

6. Please list any other contacts with this candidate by you or your staff concerning a provision of Chapter 104, Section 105.071, or Chapter 106, *Florida Statutes*. Indicate whether the contact was in person, in writing, or by telephone and the subject matter of the contact. Also, provide copies of any documentation of the contact. Please provide a separate affidavit from any member of your staff who was in contact with this candidate or his or her staff, detailing the subject matter of the contact.

Candidate and Treasurer received routine e-mail notifications regarding upcoming deadlines for the filing of campaign reports (see attached).

7. Please list each year the candidate ran for office, the office the candidate ran for, the dates of the elections, and the results of the elections.

08/24/10      School Board, District 6      Elected  
(<http://results.enr.clarityelections.com/FL/Dade/20347/32578/en/summary.html>)

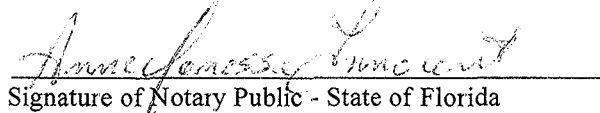
08/26/14      School Board, District 6      Elected Unopposed  
([http://www.voterfocus.com/ws/mdccand/candidate\\_pr.php?c=miamidade&el=17](http://www.voterfocus.com/ws/mdccand/candidate_pr.php?c=miamidade&el=17))

08/30/16      Mayor, Miami-Dade County      Announced Candidate  
([http://www.voterfocus.com/ws/mdccand/candidate\\_pr.php?c=miamidade&el=20](http://www.voterfocus.com/ws/mdccand/candidate_pr.php?c=miamidade&el=20))

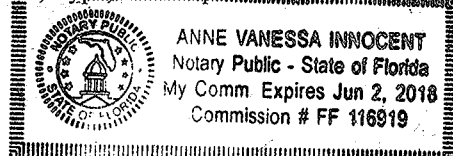
I SWEAR OR AFFIRM THAT THE INFORMATION CONTAINED IN THIS DOCUMENT IS COMPLETE AND ACCURATE TO THE BEST OF MY KNOWLEDGE.

  
Signature of Affiant

Sworn to (or affirmed) and subscribed before me this 10<sup>th</sup> day of February, 2016

  
Signature of Notary Public - State of Florida

Printed Name of Notary Public



Personally Known ☒ or Produced Identification ☐

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

**STATEMENT OF  
CANDIDATE**

(Section 106.023, F.S.)

(Please print or type)

**OFFICE USE ONLY**

2015 MAR -9 AM 10:18

**MIAMI-DADE  
ELECTIONS**

I, Raquel A. Regalado,

candidate for the office of Miami-Dade County Mayor;

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

X

Signature of Candidate  
COUNTY OF MIAMI-DADE

March 9, 2015  
Date

I, FENILOPE TOWNSEY, Supervisor  
of Elections, Miami-Dade County, Florida,  
do hereby certify that this is a true and  
correct copy of the original filed with me  
at this office.  
WITNESS my hand and the seal of the  
County of Miami-Dade, Florida, on this 9th day of March, 2015.

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).

MIAMI-DADE COUNTY, FLORIDA

Penelope Townsey

Supervisor of Elections



ATTORNEYS AT LAW

May 31, 2016

RECEIVED

2016 JUN -7 P 12:43

SMGQ

Via E-Mail

Margie B. Wade  
Investigation Specialist II  
Florida Elections Commission  
107 West Gaines Street, Suite 224  
Tallahassee, FL 32399

Re: FEC 15-372

Dear Ms. Wade:

This office represents Ms. Raquel Regalado. Please find attached the affidavits requested in connection with the above-referenced matter.

In addition to the attached affidavits, it is important to clarify a number of items. The website described in the affidavits, [www.raquelregalado.com](http://www.raquelregalado.com) (the "Website"), was simply a "landing" website. In other words, there was no content available to be viewed on this website. During the time that the video referenced in the affidavits was erroneously uploaded to the Website, the Website was currently under construction and not a finished product.

The contract between Serving Miamians and Ennova, Inc., attached hereto, references payment in the amount of 50% of the invoice upon execution of the contract, and 50% payment upon completion of the Website. At the time the video was posted, the final 50% had not been paid, as work on the Website was still ongoing. Neither Ms. Regalado nor Serving Miamians had been advertising the Website. In fact, it was not intended that the Website be viewed by any visitors at the time the video was posted.

If you have any questions or require additional information, please do not hesitate to contact me directly at 305.377.1000. Thank you for your time and attention.

Sincerely,

Michael Montiel

MM; ka

Encls.

Copy to: Raquel Regalado, Esq.  
Roland Sanchez-Medina Jr., Esq.

F:\3821.0001\ResponseLetter2 - FEC 15-372.docx

AFFIDAVIT OF ADDITIONAL INFORMATION

Case Number: FEC 15-372

STATE OF FLORIDA                     )  
COUNTY OF MIAMI-DADE            )

ROLAND SANCHEZ-MEDINA JR., being duly sworn, says:

1. This affidavit is made upon my personal knowledge.
2. I am of legal age, *sui juris* and competent to testify to the matters stated herein. I am currently employed by Sanchez-Medina, Gonzalez, Quesada, Lage, Gomez & Machado, LLP as an attorney.
3. My telephone number is 305-377-1000, Ext. 108.
4. According to the information disclosed on your 2015 M3 Report, you made an expenditure to Ennova, Inc. for "Web design." Please provide copies of the artwork and invoice for the web design.

Copies of the artwork and invoice for the web design are attached.

5. According to the information disclosed on your 2015 M3 Report, you made an expenditure to Ennova, Inc. for "advertising." Please provide copies of the advertising and the invoices.

No expenditure was made to Ennova, Inc. for advertising. The attached invoice was limited to web design and the creation of one video.

*The following questions pertain to Attachment A.*

6. The disclaimer on the web site states, "Paid and approved by Serving Miamians." Please provide the name and contact information for the person responsible the verbiage in the disclaimer.

No disclaimer was provided to Ennova, Inc. The disclaimer language was created by Ennova, Inc. as a result of the execution of the contract between Serving Miamians and Ennova, Inc.

7. Please provide the name and contact information for the person responsible for verbiage on the web site.

Amelie Ferro. She may be contacted at 305-938-0728.

8. Please provide the name and contact information for the person that reviewed and approved the web site and the person that reviewed and approved the video.

The Website had not been approved or reviewed. As referenced in the letter above, the website was in a period of initial construction and was not intended to go "live" at the time of the posting of the video. The Website was not completed and no content was available on the



Website. To my knowledge, Ennova, Inc. was in the process of testing the design and connectivity of the website at the time the video was erroneously uploaded.

9. Please provide the invoices for the web site and video that appears on the web site.

The invoices are attached hereto.

10. Please provide a copy of the payment instruments for the web site and the video.

The payment instruments are attached.

11. Please provide a copy of the video.

I am not in possession of the video, though I am attempting to obtain a copy from Ennova, Inc.

12. Was Ms. Regalado aware that your published the web site? ( ) Yes (X) No

To the best of my knowledge, Ms. Regalado was unaware that the Website was "live" and published

13. Did any officer or member of Serving Miamians discuss the web site with Ms. Regalado?  
No.

If so, please provide the name(s) and contact information for each person that communicated with Ms. Regalado. Not applicable.

14. Did Ms. Regalado provide the information for the web site? ( ) Yes (X) No

There was no information on the Website.

15. Did Ms. Regalado review the web site? ( ) Yes (X) No

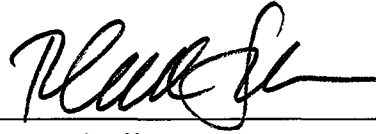
16. Did Ms. Regalado review the video? ( ) Yes (X) No

17. Did Ms. Regalado approve the web site? ( ) Yes (X) No

18. Please explain why Serving Miamians published the website?

Serving Miamians was in the process of publishing a new website about Raquel Regalado in conformity with IRS rules and regulations. Serving Miamians has been informing Miami-Dade County residents regarding Raquel Regalado and Tomas Regalado for five (5) years. The language included in the video requesting support for Ms. Regalado was simply a mistake, as the intent of the video was to educate Miami-Dade County regarding various issues. The video was immediately removed from the Website.

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



Signature of Affiant

Sworn to (or affirmed) and subscribed before me  
this 31<sup>st</sup> day of May, 2016



MICHAEL A. MONTIEL  
MY COMMISSION # FF 923292  
EXPIRES: October 1, 2019  
Bonded Thru Budget Notary Services



Signature of Notary Public - State of Florida

Print, Type, or Stamp Commissioned Name of  
Notary Public

Case Investigator: MBW

**AFFIDAVIT OF BACKGROUND INFORMATION**  
**Case Number: FEC 15-372**

**STATE OF FLORIDA**  
**County of Miami-Dade**

**Raquel Regalado, 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 Miami-Dade County Public Schools as School Board Member.

3. Have you ever run for public office? If so, please name the office(s) you ran for and the date(s) of the election(s) you ran in.

Yes, I ran for School Board Member in 2010. I was elected for a four (4) year term, and I ran again for re-election in 2014. I was re-elected to a second four (4) year term.

4. Have you ever been appointed to act as a campaign treasurer for a candidate? If so, please name the candidate(s) you served as treasurer, the office(s) the candidate ran for, and the dates of the election(s).

Yes, I was campaign treasurer for Tomas Regalado's mayoral campaign in 2008.

5. Have you ever held the office of chairperson, treasurer, board member, or other similar position for a political committee? If so, please list the names and addresses of the committees and dates when you held the position.

No.

6. Have you ever prepared or signed a campaign treasurer's report? If so, please list the name of the candidate or committee whose report you prepared or signed.

Yes, as campaign treasurer for Tomas Regalado's mayoral campaign in 2008.

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

I am a constitutionally elected official.

8. Do you possess a copy of Chapter 106, Florida Statutes? ☒ Yes ☐ No

9. If so, when did you first obtain it? 2010, 2014, and 2015.

10. Have you read Chapter 106, Florida Statutes? ☒ Yes ☐ No

11. Do you possess a copy of Chapter 104, Florida Statutes? ☒ Yes ☐ No

12. If so, when did you first obtain it? 2010.

13. Have you read Chapter 104, Florida Statutes? ☒ Yes ☐ No

14. Do you possess a copy of the *Handbook for Candidates*? ☒ Yes ☐ No

15. If so, when did you first obtain it? 2010.

16. Have you read the *Handbook for Candidates*? ☒ Yes ☐ No

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

None at this time.

18. Please describe your communication with the officers and members of Serving Miamian regarding the creation and "launching" of the website and video. Please include the time and place the communications occurred. If there were any written communications, please provide copies.

None.

*These questions below pertain to the campaign website.*

19. Did you review the website before it became "live"?

No, I did not review the website before it became "live".

20. Did you approve the website before it became "live"?

No, I did not approve the website before it became "live".

21. When did you become aware of the website?

I became aware of the website upon receipt of the letter from the Florida Elections Commission dated June 30, 2015.

22. How did you become aware of the website?

I became aware of the website upon receipt of the letter from the Florida Elections Commission dated June 30, 2015.

23. According to the written response submitted by your attorney, it was not intended for the website to be accessed by visitors. What did you and/or your campaign do to prevent visitors from accessing the website?

The Website had not been approved or reviewed at the time it went "live". Neither I nor my campaign had been advertising the Website. The Website was not intended to be viewed by any visitors during the time the video was posted. Upon receipt of the letter from the Florida Elections Commission dated June 30, 2015, I contacted Ennova, Inc. and demanded that the video and the website be taken offline immediately.

*The questions below pertain to the video.*

24. Did you review the video before it was posted on the website?

No, though I appear in the video, I had not reviewed the final product.

25. Did you approve the video before it was posted on the website?

No, I had not reviewed the final product. Furthermore, it was not my position to approve the posting of the video.

26. When did you become aware of the video?

I became aware of the video, with respect to its posting on the website, upon receipt of the letter from the Florida Elections Commission dated June 30, 2015.

27. How did you become aware of the video?

I became aware of the video, with respect to its posting on the website, upon receipt of the letter from the Florida Elections Commission dated June 30, 2015.

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 24<sup>TH</sup> day of

MAY, 2016



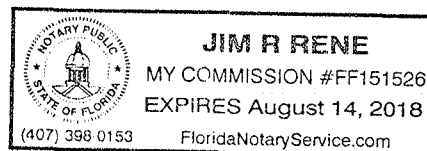
Signature of Notary Public - State of Florida

Print, Type, or Stamp Commissioned Name of Notary Public

Personally Known \_\_\_\_\_ or Produced Identification ☒

Type of Identification Produced: FLORIDA DRIVERS  
LICENSE

Case Investigator: MBW





February 25, 2015

We are thrilled to assist with your production needs. Below please find two options. Both include the different needs we discussed. In the first option I have also included as a value added the use of our studio for your campaign commercials as well as the ability to perform live streaming with interaction from third parties. This may be very interesting for any kind of survey and to increase engagement with your constituents.

**Option 1: All Inclusive**

Service
Unlimited Monthly Access to Studio Facility and Production Team Unlimited Access for:
Short format segments with director and editors that provide all post-production work.
Digital Platform Live Streaming with interaction of unlimited concurrent users.
Production of Campaign Commercials. (Studio Use)
Design of Website
Hosting of Website and a secured FTP server
Video Platform Sites: Development of YouTube branded channel with campaign website color and image theme and the publishing all productions on platform.
Monthly Fee: \$10,000

**Option 2: Per Usage**

Service	Full Day	Half Day
Studio, camera lighting and audio equipment, camera operator, fiber line	\$1,400	\$1,080
Editing, Grafic Package and Post Production	\$600	\$500
Publish productions on company website, secure FTP, social media & video platforms	\$20 per production	
Design of Website	\$3,000	
Hosting of Website and a secured FTP server	\$40 a month	
Access to Live Streaming with Interaction of Unlimited and Concurrent Users	TBD	
Access to Studio Facility for Campaign Commerical Production	TBD	

I look forward to seeing you tomorrow and continuing to explore opportunities to work together!

Best,

Amelie Ferro

www.CIMACAST.com

100 N Biscayne Boulevard Suite 2906 Miami Florida 33132

# INVOICE



e-n-n-o-v-v-a

ENNOVA INC.  
100 N Biscayne Blvd, Suite 2906  
Miami, FL 33132  
Phone: (855) 366 6882  
EIN 45-3765499

Invoice No.	Date
0438	3/6/2015

Bill To
Servings Miamians

Ship To

PO No.	Terms	Due Date
	Upon Receipt	3/6/2015

Quantity	Description	Amount	Total USD
1 Full day	<b>February 26, 2015 and March 5, 2015</b> Studio, camera lighting and audio equipment, camera operator, fiber line Editing, graphic package and postproduction	\$ 1,400.00 \$ 600.00	\$ 1,400.00 \$ 600.00
1/2 Day	<b>March 6, 2015</b> Studio, camera lighting and audio equipment, camera operator, fiber line Editing, graphic package and postproduction	\$ 1,080.00 \$ 500.00	\$ 1,080.00 \$ 500.00
Please make payments to: ENNOVA INC. 100 N. Biscayne Blvd. Suite 2906 Miami, FL 33132			
		<b>TOTAL USD</b>	<b>\$ 3,580.00</b>



# INVOICE



e-n n o v v a

ENNOVVA INC.  
100 N Biscayne Blvd, Suite 2906  
Miami, FL 33132  
Phone: (855) 366 6882  
EIN 45-3765499

Invoice No.	Date
0437	3/6/2015

Bill To
Servings Miamians

Ship To

PO No.	Terms	Due Date
	Upon Receipt	3/6/2015

Quantity	Description	Amount	Total USD
	Web Design	\$ 3,000.00	\$ 3,000.00
	50% due upon receipt of invoice		
	50% Due at completion of website		
	Please make payments to: ENNOVVA INC. 100 N. Biscayne Blvd. Suite 2906 Miami, FL 33132		
		<b>DUE NOW</b>	<b>\$1,500.00</b>
		<b>BALANCE</b>	<b>\$ 1,500.00</b>

100 W. Wesley St. Blvd  
Suite 2906  
Miami, FL 33132

Campaign

INNOVA INC

① 3580.00 + 200.00  
for videos - ad production

1,500 ✓ web design.

② Pay  
Campaign  
OK.

**\*SERVING MIAMIANS ECO\***

1985 NW 88TH CT #101  
MIAMI, FL 33172-2648

CITY NATIONAL BANK  
www.citynational.com

1146

83-438/640

3/10/2015

PAY TO THE  
ORDER OF Ennovva Inc.

\$ \*\*3,580.00

Three Thousand Five Hundred Eighty and 00/100\*\*\*\*\*

DOLLARS

Ennovva Inc.  
100 N Biscayne Blvd.  
Suite 2906  
Miami, FL 33132

MEMO

Invoice #0438



AUTHORIZED SIGNATURE

Details on Back  
Security Features Included

1146 \$3,580.00 3/13/2015




"SERVING MIAMIANS ECO" 1985 NW 88TH CT #101 MIAMI FL 33172 2648		CITY NATIONAL BANK www.citynational.com	1145 62 425440
		3/10/2015	
PAY TO THE ORDER OF	Ennova Inc.	\$	**1,500.00
One Thousand Five Hundred and 00/100		DOLLARS	
Ennova Inc 100 N Biscayne Blvd. Suite 2906 Miami, FL 33132			
MEMO	Invoice #0437	SIGNATURE	

1145 \$1,500.00 3/13/2015

Ennovva, Inc  
100 Biscayne Blvd. Suite 2906  
Miami, FL 33132

1168  
63-1145/670

09/25/15  
Date

Pay to the Order of Serving Miamians \$ 5,080  
Five thousand eighty <sup>00</sup>/<sub>100</sub> ——— Dollars  Security Features Details on Back

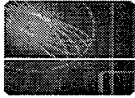
Helm Bank  
999 Brickell Ave  
Miami, FL 33131

*[Signature]*

For \_\_\_\_\_

[Redacted line]

Refund  
Advertising production



**Affidavit**  
**Margie Wade to Roland**

05/02/2016 03:54 PM

Dear Sanchez-Medina,

As chairman of Serving Miamians, please complete the attached affidavit and return it to me by Monday, May 9, 2014.

Thanks.



Aff to ECO.docx

*Margie B. Wade*

Investigation Specialist II  
Florida Elections Commission  
107 West Gaines Street, Suite 224  
Tallahassee, FL 32399  
850-922-4539 (phone)  
850-921-0783 (fax)

**AFFIDAVIT**  
**Case Number FEC 15-372**

**STATE OF FLORIDA**

**County of** \_\_\_\_\_

**Roland Sanchez-Medina, being duly sworn, says:**

1. This affidavit is made upon my personal knowledge.
2. I am of legal age and competent to testify to the matters stated herein. I am currently employed by \_\_\_\_\_ as \_\_\_\_\_.
3. Please provide the name and contact information for the person who authorized you to contact Ennovva on behalf of Ms. Regalado's campaign? \_\_\_\_\_
4. If no one authorized you to contact Ennovva, please explain why you contacted Ennovva?

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5. When (on what date) did you contact Ennovva? \_\_\_\_\_
6. Who was responsible for the verbiage on the website? \_\_\_\_\_
7. Did you discuss contacting Ennovva with Ms. Regalado? ( ) Yes ( ) No
8. During your conversation with Ms. Regalado, did she give you any instructions about the website? ( ) Yes ( ) No If yes, please provide a summary of her instructions.

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9. When (on what date) did you discuss contacting Ennovva with Ms. Regalado? \_\_\_\_\_
10. When (on what date) did you receive the refund check from Ennovva? \_\_\_\_\_
11. Please provide a copy of the front and back of the refund check.

**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 \_\_\_\_\_ day of

\_\_\_\_\_, 2016

\_\_\_\_\_  
Signature of Notary Public - State of Florida

**Print, Type, or Stamp Commissioned Name of Notary Public**

Personally Known \_\_\_\_\_ or Produced Identification \_\_\_\_\_

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

Case Investigator: MBW





**FLORIDA ELECTIONS COMMISSION**

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

November 23, 2015

Roland Sanchez-Medina, Jr., Esquire  
SM & GQ Attorneys at Law  
201 Alhambra Circle, Ste. 1205  
Coral Gables, FL 33134-5107

**RE: Case No.: FEC 15-372; Respondent: Raquel A. Regalado – AMENDED LETTER  
OF LEGAL SUFFICIENCY**

Dear Mr. Sanchez-Medina:

On June 29, 2015, the Florida Elections Commission received a complaint alleging that your client violated Florida's election laws. I have reviewed the complaint and find that it contains one or more legally sufficient allegations. The Commission staff will investigate the following alleged violation:

**Section 106.19(1)(a), Florida Statutes:** Raquel A. Regalado, a 2016 candidate for the office of Mayor of Miami-Dade County, may have accepted one or more contributions in excess of the limits prescribed by Section 106.08, Florida Statutes, as alleged in the complaint.

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

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

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

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


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

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

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

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

Sincerely,



Amy McKeever Toman  
Executive Director

AMT/enr



## FLORIDA ELECTIONS COMMISSION

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

November 5, 2015

Roland Sanchez-Medina, Jr.  
SM & GQ Attorneys at Law  
201 Alhambra Circle, Ste. 1205  
Coral Gables, FL 33134-5107

**RE: Case No.: FEC 15-372; Respondent: Raquel A. Regalado**

Dear Mr. Sanchez-Medina:

On June 29, 2015, the Florida Elections Commission received a complaint alleging that your client violated Florida's election laws. I have reviewed the complaint and find that it contains one or more legally sufficient allegations. The Commission staff will investigate the following alleged violation:

**Section 106.19(1)(a), Florida Statutes:** Raquel A. Regalado, a 2016 candidate for the office of Mayor of Miami-Dade County, may have accepted one or more contributions in excess of the limits prescribed by Section 106.08(3)(b), Florida Statutes, as alleged in the complaint.

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

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

The Commission will then hold a hearing to determine whether there is probable cause to believe you have violated Chapters 104 or 106, Florida Statutes. You and the complainant will receive a notice of hearing at least 14 days before the hearing. The notice of hearing will indicate the

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


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

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

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

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

Sincerely,



Amy McKeever Toman  
Executive Director

AMT/enr



Case No.: FEC-15-372; Respondent: Raquel Regalado

Michael Montiel

to:

fec@myfloridalegal.com

09/04/2015 05:09 PM

Cc:

Raquel Regalado, Roland Sanchez-Medina Jr.

Show Details

## 2 Attachments



image001.jpg RegaladoResponseToFEC.pdf

Ms. Riley,

Please see the attached response from Raquel Regalado in connection with the above referenced matter. If you have any questions, please do not hesitate to contact me. Thank you.

Michael

**MICHAEL A. MONTIEL, ESQ.**



SMGQ LAW

SANCHEZ-MEDINA, GONZALEZ, QUESADA,

LAGE, CRESPO, GOMEZ, MACHADO & PREIRA LLP

201 Alhambra Circle | Suite 1205 | Coral Gables, Florida 33134-5107

Office: 305.377.1000 Ext. 140 | Toll Free: 855.213.4806

[mmontiel@smgqlaw.com](mailto:mmontiel@smgqlaw.com) | [SMGQLAW.com](http://SMGQLAW.com) | [Attorney Bio](#) | [vCard](#)

CONFIDENTIALITY NOTE: The information contained in this transmission may be privileged and confidential information, and is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this transmission in error, please immediately reply to the sender that you have received this communication in error and then delete it. Thank you.

CIRCULAR 230 NOTICE: To comply with U.S. Treasury Department and IRS regulations, we are required to advise you that, unless expressly stated otherwise, any U.S. federal tax advice contained in this transmittal, is not intended or written to be used, and cannot be used, by any person for the purpose of (i) avoiding penalties under the U.S. Internal Revenue Code, or (ii) promoting, marketing or recommending to another party any transaction or matter addressed in this e-mail or attachment



ATTORNEYS AT LAW

September 4, 2015

Via Certified Mail Return Receipt Requested

Erin Riley  
Deputy Agency Clerk  
Florida Elections Commission  
107 W. Gaines Street  
Suite 224  
Tallahassee, FL 32399

Re: Case No.: FEC-15-372; Respondent: Raquel Regalado

Ms. Riley:

This correspondence is in response to the letter from the Florida Elections Commission ("FEC") dated June 30, 2015 (the "FEC Letter"). Ms. Regalado has addressed all of the issues and concerns found in the FEC Letter. Please see Ms. Regalado's response to the FEC Letter, attached hereto. If you have any questions, please contact me directly at 305.377.1000.

Sincerely,

A handwritten signature in black ink, appearing to read 'RSM', with a stylized flourish at the end.

Roland Sanchez-Medina, Jr.

el:RSM

Copy to: Raquel Regalado (Via E-mail)  
Michael Montiel

## RAQUEL REGALADO'S RESPONSE TO THE FEC LETTER

Serving Miamians, an Electioneering Communications Organization ("ECO") mistakenly engaged Ennovva, Inc. (the "Vendor") to design the website for [www.raquelregalado.com](http://www.raquelregalado.com) (the "Website"). Serving Miamians contacted the Vendor regarding this error in order to take steps to correct the error. The Vendor has since returned the funds to Serving Miamians. The refund will be reflected in the September ECO report and will be provided to the FEC. Furthermore, Ms. Regalado's campaign account has since paid the Vendor for the work performed, as well as an extra fee for changing the disclaimers on the video found on the Website, and removing all references to Serving Miamians, both on the Website and in the video. This will also be reflected in Ms. Regalado's September campaign report which will be provided to the FEC when it is due on October 10, 2015. Some of the confusion in connection with the error was likely caused by the fact that Serving Miamians intended to engage the Vendor to create videos which are in furtherance of its purpose as an ECO.

The Website, although "live" on March 9, 2015, was never fully completed by the Vendor. In fact, the Vendor's bill for the creation of the Website indicates that the Website was still currently under construction at the time it went "live". As such, it was never the intention of Serving Miamians, nor Ms. Regalado, for the Website to be accessed by visitors, nor to serve as a campaign advertisement for Ms. Regalado's campaign. The Website was simply a "landing page" as opposed to an advertised or marketed website.

Currently, the Website is offline and any visitors will find a message which states that the Website is under construction. The video which was previously featured on the Website is no longer accessible. Please see the screenshot of the Website attached hereto.

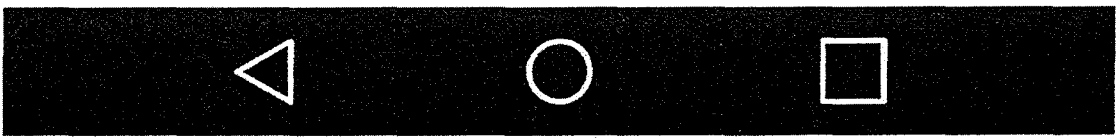
As referenced above, Serving Miamians intends to continue to engage the Vendor for the creation of additional videos which fully comply with Florida law. Despite Serving Miamians' unintentional mistake described above, moving forward Serving Miamians will continue to exist as an ECO. As the mistake has been corrected, Serving Miamians does not need to, and will not, register as a Political Committee. All acts undertaken by Serving Miamians in the future will be fully in accordance with its purpose as an ECO, in accordance with Florida law.



www.raquelregalado.com




UNDER CONSTRUCTION







**\*Confidential: Re: Confidential Complaint: FEC 15-372**   
Florida Elections Commission to: Raquel Regalado

08/28/2015 09:53 AM

From: Florida Elections Commission/OAG  
To: Raquel Regalado <raquelregaladopa@gmail.com>

Thank you. Your request for an extension of time to respond is GRANTED. Please submit your response by Friday, September 4, 2015. If you have any questions, please let me know.

Sincerely,

Donna Ann Malphurs  
Agency Clerk

Raquel Regalado Mrs. Malphurs I left you a voice mail yesterday r... 08/28/2015 07:30:33 AM

From: Raquel Regalado <raquelregaladopa@gmail.com>  
To: Florida Elections Commission <fec@myfloridalegal.com>  
Date: 08/28/2015 07:30 AM  
Subject: Re: Confidential Complaint: FEC 15-372

Mrs. Malphurs

I left you a voice mail yesterday regarding my response to this complaint that is due today. As I explained in the voicemail we are waiting on several screen shots and exhibits from the web manager and company who did the video in question. As a result of tropical storm Erika several businesses are in hurricane preparedness mode and I don't know if we will have the exhibits by close of business today. And so I am requesting an extension until Tuesday to insure that the response is complete. If said request can not be granted I ask that you please advise if and how we may supplement the response once we receive the exhibits. Thank you in advance for your attention to this matter.

Kindest regards  
Raquel Regalado

This electronic correspondence was sent from my LG G4 please excuse any errors or misspellings as a result of transmission from a smart phone device.

On Jul 30, 2015 10:54 AM, "Florida Elections Commission" <fec@myfloridalegal.com> wrote:  
Your request for an extension of time to respond to the complaint is GRANTED. Please submit your response by the close of business on August 28, 2015. Thank you.

Sincerely,

Donna Ann Malphurs  
Agency Clerk

Raquel Regalado ---07/29/2015 06:43:30 PM---Mrs. Riley Please accept the following as my formal request for an extension of time

From: Raquel Regalado <raquelregaladopa@gmail.com>  
To: [fec@myfloridalegal.com](mailto:fec@myfloridalegal.com)  
Date: 07/29/2015 06:43 PM  
Subject: Request for extention of time to respond to complaint

Mrs. Riley

Please accept the following as my formal request for an extention of time of ten (10) days to respond to the complaint filed in case number FEC 15-372. Please be advised that said request is not made for the purpose of delay but rather because we are finalizing our budget process and school rollout at Miami Dade County Public Schools and my duties as an elected official have not afforded me the opportunity to review and respond to the above referenced complaint with the assistance of counsel. I thank you in advance for your attention to this request and will be available to discuss the same over the phone should it be required.

Kindest regards

Raquel Regalado

This electronic correspondence was sent from my LG G4 please excuse any errors or misspellings as a result of transmission from smart phone device.

15-372



Elliot Berke to: fec@myfloridalegal.com

07/30/2015 11:49 AM

History:

This message has been replied to.

This email is to serve as notice that I am counsel of record for the complaint filed with the Florida Elections Commission, which was received by your office on June 29, on behalf of Darren Centinello against Raquel Regalado. My contact information is below. Thanks.

Elliot S. Berke  
Managing Partner  
Berke Farah LLP  
1200 New Hampshire Ave. NW  
Suite 800  
Washington, DC 20036

202.517.0585 (Tel.)  
eberke@berkefarah.com  
<http://www.berkefarah.com>

**PLEASE NOTE NEW ADDRESS ABOVE**

*This e-mail may contain confidential or privileged information. If you are not the intended recipient, please advise by return e-mail and delete immediately without reading forwarding to others. The following statement is provided pursuant to U.S. Treasury Department Regulations: This communication is not intended or written to be used, and cannot be used, by a taxpayer for the purpose of avoiding penalties that the Internal Revenue Service may impose on the taxpayer.*



**Confidential Complaint: FEC 15-372**   
Florida Elections Commission to: Raquel Regalado

07/30/2015 10:54 AM

From: Florida Elections Commission/OAG  
To: Raquel Regalado <raquelregaladopa@gmail.com>

---

Your request for an extension of time to respond to the complaint is GRANTED. Please submit your response by the close of business on August 28, 2015. Thank you.

Sincerely,

Donna Ann Malphurs  
Agency Clerk

---

Raquel Regalado	Mrs. Riley Please accept the following as my for...	07/29/2015 06:43:30 PM
-----------------	---	------------------------

From: Raquel Regalado <raquelregaladopa@gmail.com>  
To: fec@myfloridalegal.com  
Date: 07/29/2015 06:43 PM  
Subject: Request for extention of time to respond to complaint

---

Mrs. Riley

Please accept the following as my formal request for an extention of time of ten (10) days to respond to the complaint filed in case number FEC 15-372. Please be advised that said request is not made for the purpose of delay but rather because we are finalizing our budget process and school rollout at Miami Dade County Public Schools and my duties as an elected official have not afforded me the opportunity to review and respond to the above referenced complaint with the assistance of counsel. I thank you in advance for your attention to this request and will be available to discuss the same over the phone should it be required.

Kindest regards

Raquel Regalado

This electronic correspondence was sent from my LG G4 please excuse any errors or misspellings as a result of transmission from smart phone device.

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

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

Telephone Number: (850) 922-4539

[www.fec.state.fl.us](http://www.fec.state.fl.us)

**CONFIDENTIAL COMPLAINT FORM**

2015 JUN 29 A 10:18

The Commission's records and proceedings in a case are confidential until the Commission rules on probable cause. A copy of the complaint will be provided to the person against whom the complaint is brought.

**1. PERSON BRINGING COMPLAINT:**

Name: Darren Centinello Work Phone: (202) 517-0585  
Address: c/o Berke Farah LLP, 1200 New Hampshire Ave. NW, Suite 800 Home Phone: (202) 517-0585  
City: Washington County: N/A State: DC Zip Code: 20036

**2. PERSON AGAINST WHOM COMPLAINT IS BROUGHT:**

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

Name of individual or entity: Raquel Regalado  
Address: 1985 NW 88th Court, Suite 101 Phone: (305) 593-2644  
City: Doral County: Miami-Dade State: FL Zip Code: 33172

If individual is a candidate, list the office or position sought: Miami-Dade County Mayor

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

**3. ALLEGED VIOLATION(S):**

Please list the provisions of The Florida Election Code that you believe the person named above may have violated. The Commission has jurisdiction only to investigate the following provisions: **Chapter 104, Chapter 106, and Section 105.071, Florida Statutes.** Also, please include:

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

Please see attached complaint and supporting documentation.

Additional materials attached (check one)? ☐ Yes ☒ No

4. **OATH**

STATE OF **FLORIDA**

COUNTY OF District of Columbia

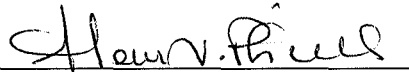
I swear or affirm, that the above information is true and correct to the best of my knowledge.

2015 JUN 29 AM 10:18  
NOTARY PUBLIC  
DISTRICT OF COLUMBIA

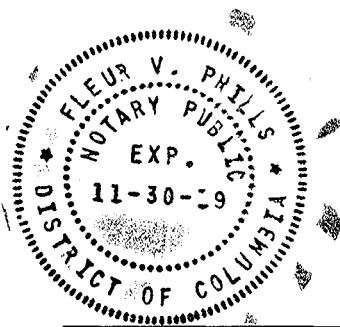


Original Signature of Person Bringing Complaint

Sworn to and subscribed before me this 25th day of  
June, 20 15



Signature of Officer Authorized to Administer Oaths or Notary public



**FLEUR V. PHILLS**  
NOTARY PUBLIC DISTRICT OF COLUMBIA  
My Commission Expires November 30, 2019

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

Personally known \_\_\_\_\_ Or Produced Identification X

Type of Identification Produced N.Y. State [REDACTED]

Any person who files a complaint while knowing that the allegations are false or without merit commits a misdemeanor of the first degree, punishable as provided in Sections 775.082 and 775.083, Florida Statutes.

## COMPLAINT

This complaint is filed pursuant to Fla. Stat. § 106.25(2) and is based on information and belief that Raquel A. Regalado, a candidate for Miami-Dade County Mayor; Raquel Regalado for Miami-Dade County Mayor, her campaign committee; and Serving Miamians, an Electioneering Communications Organization (“ECO”) registered with the Florida Secretary of State’s Office (collectively, the “Respondents”) violated provisions of the Florida Campaign Financing Act (the “Act”), Fla. Stat. §§ 106.011 *et seq.*

Specifically, Ms. Regalado appears to have accepted an illegal in-kind contribution from Serving Miamians in the form of her campaign website and a campaign video, which expressly advocates for her election, being paid for and approved by Serving Miamians. In paying for and approving her campaign website, Serving Miamians may have also violated campaign finance laws that prohibit an ECO from making expenditures that expressly advocate for a candidate, and may have also failed to register as a political committee. Each potential violation, along with supporting facts and documentation, are outlined below and attached as exhibits to this complaint.

### ***Raquel Regalado May Have Accepted an Illegal In-Kind Contribution from Serving Miamians***

Raquel Regalado registered as a candidate for Miami-Dade County Mayor on March 9, 2015.<sup>1</sup> Serving Miamians is an ECO that registered with the Florida Secretary of State’s Division of Elections on February 5, 2013.<sup>2</sup> Ms. Regalado’s campaign website, [www.raquelregalado.com](http://www.raquelregalado.com), went live on March 9, 2015, the same day she registered as a candidate. Since then and to at least date of filing, the website has contained campaign videos and language that expressly advocates the election of Ms. Regalado to Miami-Dade County Mayor. Instead of being paid for by Ms. Regalado’s campaign committee, however, a disclaimer on the bottom of the website explicitly states that it is “Paid and approved by Serving Miamians.”<sup>3</sup> Likewise, the video posted on the website, which depicts Ms. Regalado stating directly to the camera, “I’m Raquel Regalado, and I’m asking for your support to be the next Mayor of Miami-Dade County,” also contains a disclaimer stating that the video was “Paid for and approved by Serving Miamians.”

The Act defines a “contribution” as “a gift, subscription, conveyance, deposit, loan, payment, or distribution of money or anything of value, **including contributions in kind having an attributable monetary value in any form, made for the purpose of influencing the results of an election** or making an electioneering communication.” Fla. Stat. § 106.011(5)(a)(emphasis added). Serving Miamians’ payment for a professional quality campaign video and website most certainly has an attributable monetary value, as such products and services can cost as much as several thousand dollars. Such payments would therefore constitute an in-kind contribution to Ms. Regalado’s campaign. Moreover, they would also amount to the receipt of an excessive contribution by Regalado, in violation of Fla. Stat. § 106.08(1)(a)(2).

---

<sup>1</sup> Copies of Ms. Regalado’s candidate registration forms, filed March 9, 2015, are attached to this complaint.

<sup>2</sup> Copies of Serving Miamians’ Electioneering Communications Organization registration forms, filed February 5, 2013, are attached to this complaint.

<sup>3</sup> Printouts and screenshots of [www.raquelregalado.com](http://www.raquelregalado.com) from April 2, 2015 are attached to this complaint.

Under Florida law, ECOs are prohibited from making contributions, including in-kind contributions, to candidates, political parties, or political committees, and candidates are precluded from accepting contributions from ECOs. Fla. Stat. § 106.011(9). In fact, the only election-related activities in which ECOs may engage are making expenditures for electioneering communications or accepting contributions for the purpose of making electioneering communications. *Id.*

By accepting an in-kind contribution from Serving Miamians, in the form of a professionally produced campaign website and a campaign video, Ms. Regalado and her campaign appear to have violated Florida law. If such violations were knowing and willful, and it appears they may have been, given that the campaign video depicts Regalado speaking directly to the camera and contains a Serving Miamians disclaimer, Ms. Regalado, her campaign and Serving Miamians should be investigated for potential criminal penalties pursuant to Fla. Stat. § 106.19(1)(d).

### ***Serving Miamians May Have Violated Florida Law By Making Express Advocacy Communications***

As discussed above, an ECO's election-related activities are limited to making expenditures for electioneering communications or accepting contributions for the purpose of making electioneering communications. Importantly, ECOs may not "expressly advocate" the election or defeat of a candidate. *See* Fla. Stat. § 106.011(8)(a)(1). An "electioneering communication" is defined as a:

communication that is publicly distributed by a television station, radio station, cable television system, satellite system, newspaper, magazine, direct mail, or telephone and that:

1. Refers to or depicts a clearly identified candidate for office without expressly advocating the election or defeat of a candidate but that is susceptible of no reasonable interpretation other than an appeal to vote for or against a specific candidate;
2. Is made within 30 days before a primary or special primary election or 60 days before any other election for the office sought by the candidate; and
3. Is targeted to the relevant electorate in the geographic area the candidate would represent if elected.

Fla. Stat. § 106.011(8).

A web video and website dedicated entirely to expressly advocating the election of Regalado, a clearly identified candidate, are far from "electioneering communications." Rather,



they are fully coordinated express advocacy expenditures that are impermissible for an ECO, like Serving Miamians, to pay for or sponsor. Serving Miamians is therefore in violation of Florida law for engaging in prohibited election-related activities by an ECO.

### ***Serving Miamians Should Have Registered as a Political Committee***

Because Serving Miamians has engaged in express advocacy communications through Regalado's website and web video, it would have triggered political committee status after it made over \$500 in expenditures in a calendar year. In fact, a Statement of Organization for a political committee must be filed within 10 days after its organization when a group receives contributions or makes expenditures in excess of \$500 in a calendar year. Fla. Stat. § 106.03(1)(a). Considering the cost to produce a professional quality web video and website, it is likely Serving Miamians spent over \$500 for both. Therefore, Serving Miamians was required to relinquish its ECO status and register as a political committee.

Failure of a political committee to file a statement of organization pursuant to Fla. Stat. § 106.03 falls within the scope of Fla. Stat. § 106.19(1)(c); therefore, the deliberate failure to furnish the information required by the statement could constitute a misdemeanor. *State v. Greco*, 479 So. 2d 786, 1985 Fla. App. LEXIS 16786 (Fla. 2nd DCA 1985).

### **Conclusion**

The Florida Elections Commission should take steps to immediately investigate Ms. Regalado, her campaign, and Serving Miamians for violating the foregoing sections of the Florida Campaign Financing Act. In doing so, the agencies should find probable cause to believe Respondents violated the Act, determine and impose appropriate sanctions for any and all violations, and enjoin them from any and all violations in the future. The foregoing is correct and accurate to the best of my knowledge, information and belief.

APPOINTMENT OF CAMPAIGN TREASURER  
AND DESIGNATION OF CAMPAIGN  
DEPOSITORY FOR CANDIDATES

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

(PLEASE PRINT OR TYPE)

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

RECEIVED

2015 MAR -9 AM 10:18

MIAMI-DADE  
ELECTIONS

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)

Raquel A. Regalado

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

1850 SW 36th Avenue  
Miami, FL 33145

4. Telephone

(305 ) 593-2644

5. E-mail address

raquelregaladopa@gmail.com

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

Miami-Dade County Mayor

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

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

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

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

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

10. Name of Treasurer or Deputy Treasurer

Carlos M. Trueba

11. Mailing Address

1985 NW 88th Court, Suite 101

12. Telephone

( 305 ) 593-2644

13. City

Doral

14. County

Miami-Dade

15. State

FL

16. Zip Code

33172

17. E-mail address

cpazos@rtc-cpa.com

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

19. Name of Bank

City National Bank

20. Address

8725 NW 18th Terrace

21. City

Miami

22. County

Miami-Dade

23. State

Florida

24. Zip Code

33172

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

25. Date

March 9, 2015

26. Signature of Candidate

X

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

I, Carlos M. Trueba, do hereby accept the appointment  
(Please Print or Type Name)

designated above as:

☒ Campaign Treasurer

☐ Deputy Treasurer

March 9, 2015  
Date

X

Signature of Campaign Treasurer or Deputy Treasurer

**STATEMENT OF  
CANDIDATE**

(Section 106.023, F.S.)

(Please print or type)

**OFFICE USE ONLY**

2015 MAR -9 AM 10:18

**MIAMI-DADE  
ELECTIONS**

I, Raquel A. Regalado

candidate for the office of Miami-Dade County Mayor

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

X

  
Signature of Candidate

March 9 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).



Access to Handbook and the  
Election Laws of the State of Florida

RECEIVED

2015 MAR -9 AM 10:18

MIAMI-DADE  
ELECTIONS

Candidate/Chairperson:

Raquel

A.

Regalado

First Name

Middle Name

Last Name

Miami-Dade County Mayor

Office Sought / Organization

I acknowledge that it is my responsibility to read, understand and follow the requirements described in the following resources available on the Miami-Dade County Elections Department Website:

- ☒ Candidate Qualifying Handbook (<http://www.miamidade.gov/elections/candidate.asp>)  
Contains information on State Laws and Handbooks, the Election Laws of the State of Florida, County Laws and Handbooks, Qualifying Information, Electronic Reporting Dates and Procedures, Important Candidate Information, and Recent Legislative Changes.
- ☐ Political Committee Handbook (<http://www.miamidade.gov/elections/pacs.asp>)  
Contains information on State Laws and Handbooks, the Election Laws of the State of Florida, County Laws and Handbooks, Electronic Reporting Dates and Procedures, Important Committee Information, and Recent Legislative Changes.

Acknowledged by: \_\_\_\_\_

Candidate / Chairperson Signature

Date: MAR 9, 2015

Primary Telephone Number: \_\_\_\_\_

305-593-2644

Alternate Telephone Number: \_\_\_\_\_

E-mail address: raquelregaladopa@mail.com

**Campaign Treasurer's Report  
Miami-Dade County Electronic Filing Requirements**

☒ Candidate (office sought): Miami-Dade County Mayor

Candidate's Florida Voter Registration Number: 110015425

☐ Political Committee: N/A

☐ Party Executive Committee: N/A


☐ Other: N/A

RECEIVED  
2015 MAR -9 AM 10:19  
MIAMI-DADE  
ELECTIONS

I, Raquel A. Regalado  
(Please print name of Candidate or Chairperson)

understand that Campaign Treasurer's Reports must be filed electronically via the Supervisor of Elections website by midnight of the day designated in order to comply with Miami-Dade County requirements. I also acknowledge that Sections 12-17 and 12-21 of the Code of Miami-Dade County regarding the filing of the campaign finance reports with the Supervisor of Elections were recently amended in that original signed hardcopies are no longer required.

I also understand that, in accordance with Section 12-14.1 of the Code of Miami-Dade County, Florida, candidates running for the Offices of Miami-Dade County Mayor, Commissioner, Property Appraiser, Clerk of the Circuit Courts, and Community Council must now file the Absentee Ballot Campaign Report (MD-ED 26) to disclose the names of paid campaign workers engaged in absentee ballot activities.

  
\_\_\_\_\_  
Signature of Candidate or Chairperson

March 7, 2015  
\_\_\_\_\_  
Date

Day Time Telephone Number: 305-593-2644

Alternate Contact Number: \_\_\_\_\_

Email Address: cpazos@rtc-cpa.com

*Form must be filed with the qualifying officer within 10 days after the Appointment of Campaign Treasurer and Designation of Campaign Depository form is filed.*

**R** RAQUEL  
REGALADO

LATEST NEWS

★ ENGLISH ★

★ ESPAÑOL ★

## Raquel Regalado for Miami-Dade County Mayor

---

### About Raquel Regalado

Raquel Regalado is a lifelong resident of the Miami-Dade County School Board District 6, which encompasses the areas of Key Biscayne, the Roads, East Little Havana, Shenandoah, Silver Bluff, Coconut Grove, Coral Gables, South Miami and Westchester. On the Board, Ms. Regalado chairs the Facilities and Construction Reform Committee, and serves as a member of the Instructional Excellence & Community Engagement, School Support & Accountability, and Innovation,

partners to teach the basics of computer programming, also known as Code, to all MDCPS students. Ms. Regalado has also organized several law days throughout the district for residents and parents to meet with pro bono attorneys and government agencies where participants receive advice regarding issues ranging from foreclosure and landlord tenant rights to disability benefits.

As a School Board Member, she has paved the way for improvements in district wide transportation and brought to the board a five year plan which resulted in the replacement of old and inefficient school buses with energy efficient buses that exceed the state's safety requirements. As a member of the Southeast Florida Regional Partnership Executive Committee, she helped devise the Seven50 plan to secure the economic future and improving the quality of life in the seven-county region comprising Monroe, Miami-Dade, Broward, Palm Beach, Martin, St. Lucie and Indian River counties during the next 50 years and beyond.

At the national level, Ms. Regalado has participated in programs regarding comprehensive immigration reform and the school districts role in assimilation and English learning. As a board member of the National Association of Latino Elected and Appointed Officials (NALEO) Ms. Regalado has spoken nationally on the need for immigration reform and on juvenile justice and the benefits of Florida's civil citation alternative. As a Hispanic English learner, Ms. Regalado has also been an advocate for bilingual education, a frequent speaker at conferences to explain public education from an English learners' perspective, debunk the myth that English learners are not academic achievers; and championed the important role that bilingual education will have in Florida's new economy.

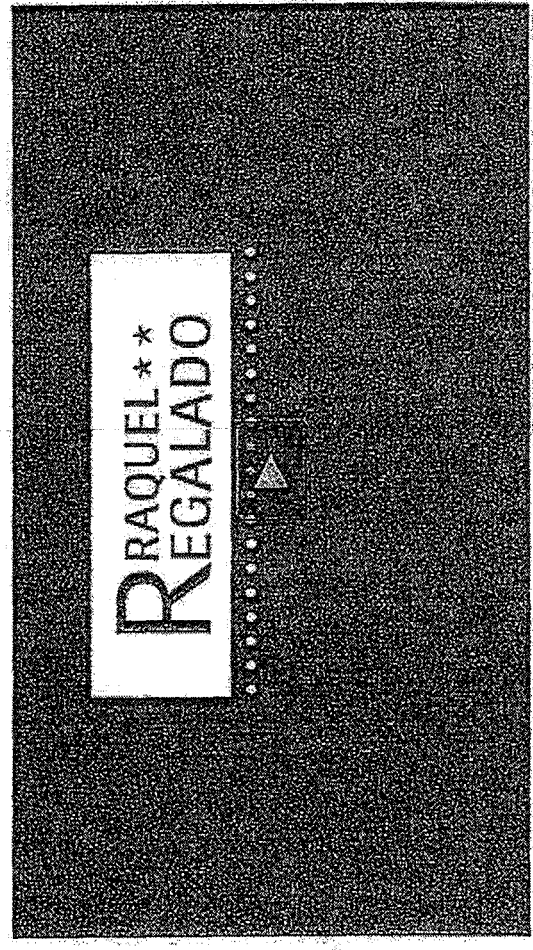
A graduate of Coral Gables High, Ms. Regalado attended Miami-Dade Community College and then Florida International University, earning a degree in Liberal Studies with honors, earning a Juris Doctorate degree from St. Thomas University School of Law. At St. Thomas, she was the recipient of the Florida Bar's Young Lawyers Division Scholarship and winner of the St. Thomas University School of Law C. Clyde Atkins Memorial Moot Court Competition and American Trial Lawyers Association Open/Close Competition. Ms. Regalado was a member of the St. Thomas Law Review and the Moot Court Team.

Ms. Regalado is admitted to practice law in Florida state courts and in the United

RAQUEL\*\*  
REGALADO

for Miami-Dade County Mayor

LATEST NEWS



\* ENGLISH \* \* ESPAÑOL \*

Raquel Regalado for Miami-Dade County Mayor



About



several plans to secure the economic future and improving the quality of life in the seven-county region comprising Miami-Dade, Broward, Palm Beach, Martin, St. Lucie and Indian River counties during the next 50 years and beyond.

At the national level, Ms. Regalado has participated in programs regarding comprehensive immigration reform and the school districts role in assimilation and English learning. As a board member of the National Association of Latino Elected and Appointed Officials (NALEO), Ms. Regalado has spoken nationally on the need for immigration reform and on juvenile justice and the benefits of Florida's civil citation alternative. As a Hispanic English learner, Ms. Regalado has also been an advocate for bilingual education, a frequent speaker at conferences to explain public education from an English learners' perspective, debunk the myth that English learners are not academic achievers, and championed the important role that bilingual education will have in Florida's new economy.

A graduate of Coral Gables High, Ms. Regalado attended Miami-Dade Community College and then Florida International University, earning a degree in Liberal Studies with honors, earning a Jura Doctorate degree from St. Thomas University School of Law. At St. Thomas, she was the recipient of the Florida Bar's Young Lawyers Division Scholarship and winner of the St. Thomas University School of Law C. Clyde Atkins Memorial Moot Court Competition and American Trial Lawyers Association Open/Close Competition. Ms. Regalado was a member of the St. Thomas Law Review and the Moot Court Team.

Ms. Regalado is admitted to practice law in Florida state courts and in the United States District Court for the Southern District of Florida. Ms. Regalado is an active member of several bar associations, including the American Bar Association, Cuban American Bar Association, and is the member of the Intellectual Property Law Association of Florida. She was an Adjunct Professor of Business Law at Miami Dade College, Wolfson Campus. Ms. Regalado was named a Rising Star in Intellectual Property Litigation by Florida Trend magazine and named among the top 40 attorneys in Miami-Dade County under 40 years old by the Cystic Fibrosis Foundation.

Since 2009, Ms. Regalado has conducted a daily Spanish language radio program on La Poderosa, 670 AM, dedicated to informing listeners about local politics, education and social services. Another of her projects is Esta Semana con Raquel, a weekly television show with political and news analysis, airing on Telemiami throughout the state of Florida. Interview from Esta Semana con Raquel can be seen on <http://www.youtube.com/user/RaquelitaRegalado/videos>. Ms. Regalado also writes for El Nuevo Herald and the Huffington Post and has contributed to the Miami Herald, El Diario de las Americas, Libre, Libertad and Community Papers. Having written dozens of articles her latest ones can be found on <http://raquelregaladoopinions.blogspot.com/>. Finally, Ms. Regalado is a member of the Community Advisory Board of WLRN, Channel 17, in Miami, Florida.

Ms. Regalado is the proud mother of two children and the daughter of Tomas Regalado, the Mayor of the City of Miami.



## Florida Department of State

Room 316, R.A. Gray Building  
500 South Bronough Street  
Tallahassee, FL 32399-0250  
(850)245-6200

### Division of Elections

#### *Committee Tracking System*

#### Serving Miamians

**Type:** Electioneering Communications Organization

**Status:** Active

**Address:** 1985 Northwest 88th Court  
Suite 101  
Doral, FL 33172

**Phone:** (305)593-2644

**Chairperson:** Roland Sanchez-Medina

**Treasurer:** Carlos Trueba  
1985 Northwest 88th Court  
Suite 101  
Doral, FL 33172

**Registered Agent:** Parker D Thomson  
200 South Biscayne Boulevard  
Suite 400  
Miami, FL 331310000

**Purpose:**

**Affiliates:**

Campaign Finance Activity

Campaign Documents

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

OFFICE USE ONLY

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DEPARTMENT OF STATE  
2008 FEB -5 AM 10:01  
DIVISION OF ELECTIONS  
TALLAHASSEE, FL

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

**Registered Agent and Office Information**

Name  
**Parker D. Thomson**

Telephone  
**(305) 459-8613**

Street Address  
**200 South Biscayne Boulevard, Suite 400**

City  
**Miami**

State  
**Florida**

Zip Code  
**33131**

Mailing Address  
**200 South Biscayne Boulevard, Suite 400**

City  
**Miami**

State  
**Florida**

Zip Code  
**33131**

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

  
Signature of Registered Agent

February 4, 2013  
Date

**Former Registered Agent and Office Information (for changes only)**

Name

Telephone

Street Address

City

State

Zip Code

**Committee or Organization Information**

Name of Committee or Organization

**Serving Miamians**

Street Address  
**1985 NW 88th Court, Suite 101**

Telephone  
**(305) 593-2644**

City  
**Doral**

State  
**Florida**

Zip Code  
**33172**

  
Signature of Chairperson

**Parker D. Thomson**  
Printed Name of Chairperson

February 4, 2013  
Date

**ELECTIONEERING COMMUNICATION  
STATEMENT OF ORGANIZATION**

(PLEASE TYPE)

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COMMISSIONER OF STATE

2013 FEB -5 AM 10:00

DIVISION OF ELECTIONS  
TALLAHASSEE, FL

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**1. Full Name of Organization**

Serving Miamians

**Telephone**

(305) 593-2644

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

1985 NW 88th Court, Suite 101, Doral, Florida 33172

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

1985 NW 88th Court, Suite 101, Doral, Florida 33172

**2. Affiliated or Connected Organizations**

Name of Affiliated or Connected Organization	Mailing Address	Relationship
NONE		

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

This organization will promote and educate voters in Miami-Dade and Broward Counties on county and local political candidates.

**4. Identify by Name, Address and Position, the Custodian of Books and Accounts for the Organization**

Full Name	Mailing Address	Street Address	Title or Position
Carlos Trueba	1985 NW 88th Court Suite 101 Doral, FL 33172	1985 NW 88th Court Suite 101 Doral, FL 33172	Treasurer

**ELECTIONEERING COMMUNICATION  
STATEMENT OF ORGANIZATION**

(PLEASE TYPE)

RECEIVED  
OFFICE OF STATE

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DIVISION OF ELECTIONS  
TALLAHASSEE, FL

OFFICE USE ONLY

**1. Full Name of Organization**

Serving Miamians

**Telephone**

(305) 593-2644

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

1985 NW 88th Court, Suite 101, Doral, Florida 33172

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

1985 NW 88th Court, Suite 101, Doral, Florida 33172

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Carlos Trueba	1985 NW 88th Court Suite 101 Doral, FL 33172	1985 NW 88th Court Suite 101 Doral, FL 33172	Treasurer



## FLORIDA DEPARTMENT of STATE

**RICK SCOTT**  
Governor

**KEN DETZNER**  
Secretary of State

February 6, 2013

Mr. Parker D. Thomson, Chairperson  
Serving Miamians  
200 South Biscayne Boulevard,  
Suite 400  
Doral, Florida 33172

Dear Mr. Thomson:

This will acknowledge receipt of the Application for Certification for Serving Miamians, which was placed on file in our office on February 5, 2013. This information appears to comply with the requirements of Section 106.011 and 106.03, Florida Statutes. The name of this organization has been placed on our active list as an electioneering communications organization.

### Campaign Treasurer's Reports

Your first campaign treasurer's report will be due on April 10, 2013. The report will cover the period of January 1, 2013 - March 31, 2013. All electioneering communications organizations that file reports with the Division of Elections are required to file by means of the Division's electronic filing system (EFS).

### Credentials and Sign-ons

Below is the web address to access the EFS and the organization's user identification number. The enclosed sealed envelope contains the organization's initial password. Once you have logged in using the initial password, you will be immediately prompted to change it to a confidential sign-on. The chairperson, 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 Web site Address: <https://efs.dos.state.fl.us>  
Identification Number: 60265



R. A. Gray Building • 500 South Bronough Street • Tallahassee, Florida 32399-0250  
Telephone: (850) 245-6240 • Facsimile: (850) 245-6259 [www.dos.state.fl.us](http://www.dos.state.fl.us)  
Commemorating 500 years of Florida history [www.fl500.com](http://www.fl500.com)



Mr. Parker D. Thomson, Chairperson  
February 6, 2013  
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' web site at <http://elections.myflorida.com>. 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, 2012 *Electioneering Communications Organization Handbook*, 2013 *Calendar of Reporting Dates* and Rule 1S-2.017, Florida Administrative Code.

Please let me know if you need additional information.

Sincerely,



Kristi Reid Bronson, Chief  
Bureau of Election Records

KRB/ljr

Enclosures

cc: Mr. Carlos Trueba, Treasurer

# SERVING MIAMIANS ECO

1985 N.W. 88<sup>th</sup> Court  
Suite #101  
Doral, FL 33172

RECEIVED  
DEPARTMENT OF STATE  
2014 SEP 17 AM 10:01  
DIVISION OF ELECTIONS

September 11, 2014

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

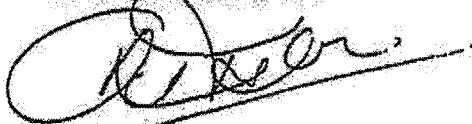
To whom it may concern,

By this means we would like to inform you we have appointed a new Chairman. As of today the new chairman will be Roland Sanchez-Medina. Mr. Medina's address is 201 Alhambra Circle, Suite 1205, Coral Gables, FL 33134.

Thank you very much for your prompt attention and cooperation in this matter.

Sincerely yours,

Serving Miamians ECO



Carlos M. Trueba  
Treasurer



# Florida Statutes

## Title IX

### ELECTORS AND ELECTIONS

## Chapter 106

### CAMPAIGN FINANCING

**106.011 Definitions.**—As used in this chapter, the following terms have the following meanings unless the context clearly indicates otherwise:

(9) "Electioneering communications organization" means any group, other than a political party, affiliated party committee, or political committee, whose election-related activities are limited to making expenditures for electioneering communications or accepting contributions for the purpose of making electioneering communications and whose activities would not otherwise require the group to register as a political party or political committee under this chapter.

(16)(a) "Political committee" means:

1. A combination of two or more individuals, or a person other than an individual, that, in an aggregate amount in excess of \$500 during a single calendar year:

a. Accepts contributions for the purpose of making contributions to any candidate, political committee, affiliated party committee, or political party;

b. Accepts contributions for the purpose of expressly advocating the election or defeat of a candidate or the passage or defeat of an issue;

c. Makes expenditures that expressly advocate the election or defeat of a candidate or the passage or defeat of an issue; or

d. Makes contributions to a common fund, other than a joint checking account between spouses, from which contributions are made to any candidate, political committee, affiliated party committee, or political party;

From: (202) 517-0585  
 Elliot S. Berke  
 Berke Farah LLP  
 1200 New Hampshire Ave. NW  
 Suite 800  
 WASHINGTON, DC 20036

Origin ID: BZSA



Ship Date: 26 JUN 15  
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SHIP TO: (850) 922-4539  
**Amy McKeever Toman**  
**Florida Elections Division**  
**107 West Gaines Street**

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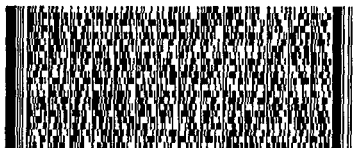
TALLAHASSEE, FL 32399

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Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on [fedex.com](http://fedex.com). FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits - see current FedEx Service Guide.