STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

EEC 01 046

In Ke	: Shelby Green	Case No.: FEC 21-246
TO:	Shelby Green	Division of Elections
	Post Office Box 5651	500 S. Bronough Street, Room 310
	Tallahassee, FL 32314	Tallahassee, FL 32399

NOTICE OF HEARING (INFORMAL HEARINGS (IH))

A hearing will be held in this case before the Florida Elections Commission on, **November 14, 2023 at 8:30 a.m.,** *or as soon thereafter as the parties can be heard*, at the following location: **402 South Monroe Street, 12 HOB, Tallahassee, Florida 32399.** Due to heightened security access requirements, please bring only essential items into the building and plan to arrive early to allow for delays coming through security.

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

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

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

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

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

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

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

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

See further instructions on the reverse side.

CI . 11

Tim Vaccaro

Executive Director Florida Elections Commission October 31, 2023 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 to 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.

Stephanie Cunningham

www.fec.state.fl.us

From: Sent: To: Subject: Attachments:	S Green <sbsllc2017@gmail.com> Thursday, August 17, 2023 5:06 PM Stephanie Cunningham Re: FEC Cases FinAffiAug 17, 2023 Doc 2.pdf</sbsllc2017@gmail.com>
Please see my finan	cial affidavit attached.
Thank you.	
_	23 at 10:20 AM S Green < <u>sbsllc2017@gmail.com</u> > wrote: et this taken care of today.
On Tue, Aug 15, 20	023 at 4:05 PM Stephanie Cunningham < Stephanie.Cunningham@myfloridalegal.com wrote:
Ms. Green:	
	been continued to the November meeting. I have attached a copy of my prior email regarding the cial Support for your review.
Congratulations o	on your little one.
Stephanie J. Cunn	ingham
General Counsel	
Florida Elections (Commission
107 W. Gaines Str	reet
Collins Building, S	uite 224
Tallahassee, FL 32	2399
stephanie.cunning	gham@myfloridalegal.com
(850) 922-4539	
(850) 921-0783 fa	nx

Address: Po Box 5651

Parlahasse, ft 323/4

4. I have other income paid: () weekly () every two weeks () semi-monthly () monthly () yearly. WA

(Circle "Yes" and fill in the amount if you have this kind of income, otherwise circle "No")

Social Security benefits?	YES of NO	\$
Veterans' benefits?	YES of NO	\$
Unemployment compensation?	YES or NO	\$
Child support or regular support from family	YES o (NO)	\$
members/spouse?	YES OI(NO)	\$
Union funds?		
Workers compensation?	YES or NO	\$
Rental income?	YES or NO	\$
Retirement/ Pensions?	YES or NO	\$
	YES of NO	\$
Dividends or interest?	YES or NO	S
Trusts/ Gifts?	YES of NO	
Any other income not on the list?	1ES OLNO	\$

5. I have other assets: (Circle "yes" and fill in the value of the property, otherwise circle "No"; use the back to provide additional information)

Cash?	YES OF NO	\$	TO CO
Savings?	YES OF TO	s 4k	In Cons
Bank account(s)?	YES or NO	5500	
Stocks/ Bonds?	YES or NO	S	
Money market accounts?	YES OF NO	5 4 R	
a. Certificates of deposit or Equity* in real estate (excluding homestead) if yes, please list the address of this property below.	Trust Firtflorila W Prime Mewilian	\$4,000	
b. Equity* in motor vehicles/boats/other tangible property expectancy in an interest in such property?) if yes, please list the information for this property below.	YES or NO	\$	

^{*}Equity means value minus loans.

a Address	4580	Faulkne	rle	Talla	harrengte.	52311
a. Address.	and make/r	nodel & tag#	2018	Terle	model S	GRE3N
b. List the y	ear/make/i	model of tagin.	-			

Check one: I () DO WOO NOT expect to receive more assets in the near future. The asset is

6. I have total liabilities and debts of S 215 k as follows:

	Other Real Property \$
Home \$	Credit Cards \$
Motor Vehicle \$ 50 K	Costs of medicine \$
Medical bills \$ 5 K	Other \$ 220,050
Child Support paid direct \$	

Student > Personal

- 8. I receive: (Circle "Yes" or "No")
 Temporary Assistance for Needy Families Cash Assistance
 Poverty-related Veterans' Benefits
 Supplemental Security Income (SSI)

STATE OF FLOR	
COUNTY OF	Leon

swear or affirm that the above in	nformation is true and correct to the best of my knowledge.
	A Van dare
	Signature of Respondent Sworn to and subscribed before me this day of
	august . 20 23.

Signature of Officer Authorized to Administer Oaths or
Notary public.

TIANNA COHEN
Notary Public, State of Florida

Notary Public, State of Florida Commission# HH 309908 My comm. expires Sept. 7, 2026

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

STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

In Re: Shelby Green	Case No.:	FEC 21-246
	1	

ORDER CONTINUING CASE

THIS MATTER was heard by the Florida Elections Commission (Commission) at its regularly scheduled meeting on August 15, 2023, in Tallahassee, Florida.

Commission Staff requested that the matter be continued. Staff spoke with Respondent prior to the hearing and was informed that Respondent did not receive the Notice of Hearing and was unaware of the hearing date. Respondent indicated that she was unavailable on the date of the hearing and requested that the case be continued so that she could attend.

The Commission considered Staff's request. Staff's request was GRANTED.

THIS MATTER is continued until the next available meeting of the Florida Elections Commission.

DONE AND ORDERED by the Florida Elections Commission on August 15, 2023.

Tim Vaccaro, J.D., Executive Director For Joni Alexis Poitier, Vice Chair Florida Elections Commission

Copies furnished to: Stephanie J. Cunningham, General Counsel Shelby Green, Respondent Division of Elections, Complainant

STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

EEC 21 246

ın Ke	: Snelby Green	_/	Case No.: FEC 21-240
то:	Shelby Green		Division of Elections
	PO Box 5651		500 South Bronough Street, Room 316
	Tallahassee, FL 32314-5651		Tallahassee, FL 32399

NOTICE OF HEARING (INFORMAL HEARING)

A hearing will be held in this case before the Florida Elections Commission on, **August 15, 2023 at 8:30 a.m.**, or as soon thereafter as the parties can be heard, at the following location: **Virtual Meeting via GoTo Webinar:**

WEB PARTICIPATION: https://attendee.gotowebinar.com/register/4391393799096818270
AUDIO PARTICIPATION: 1 877 309 2074 ATTENDEE ACCESS CODE: 424-284-031

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.

CI . 11

Tim Vaccaro

Executive Director Florida Elections Commission August 1, 2023 Please refer to the information below for further instructions related to your particular hearing:

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

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

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

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

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

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

STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

Florida Elections Commission, Petitioner,

Case No.: FEC 21-246

Shelby Green, Respondent.

v.

ORDER OF PROBABLE CAUSE

THIS MATTER was heard by the Florida Elections Commission (Commission) at its regularly scheduled meeting on May 16, 2023, in Tallahassee, Florida.

On April 11, 2023, Staff recommended to the Commission that there was probable cause to believe that the Florida Election Code was violated. The facts articulated in Staff's Recommendation are adopted by reference and incorporated herein. Based on the Complaint, Report of Investigation, Staff's Recommendation, and oral statements (if any) made at the probable cause hearing, the Commission finds that there is **probable cause** to charge Respondent with the following violation(s):

Count 1:

On or about February 2, 2021, Shelby Green, violated Section 106.07(5), Florida Statutes, when she certified that Randolph Bracy's amended 2021 TR Report was true, correct, and complete when it was not.

THIS SPACE INTENTIONALLY LEFT BLANK

Count 2:

On or around February 2, 2021, Shelby Green, violated Section 106.19(1)(c), Florida Statutes, when she deliberately failed to include information required by Chapter 106, Florida Statutes, on Randolph Bracy's 2021 TR Report.

DONE AND ORDERED by the Florida Elections Commission on May 16, 2023.

Tim Vaccaro, J.D., Executive Director For Joni Alexis Poitier, Vice Chair Florida Elections Commission

Copies furnished to: Stephanie J. Cunningham, General Counsel Shelby Green, Respondent Division of Elections, Complainant

NOTICE OF RIGHT TO A HEARING

As the Respondent, you may elect to resolve this case in several ways. First, you may elect to resolve this case by <u>consent order</u> 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 <u>informal hearing</u> held before the Commission, if you <u>do not</u> 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 <u>formal hearing</u> held before an administrative law judge in the Division of Administrative Hearings (DOAH), if you dispute any material fact in the Staff Recommendation. You have 30 days from the date the Order of Probable Cause is filed with the Commission to request such a hearing. The date this order was filed appears in the upper right-hand corner of the first page of the order. At the hearing, you will have the right to present evidence

relevant to the violation(s) listed in this order, to cross-examine opposing witnesses, to impeach any witness, and to rebut the evidence presented against you.

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

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

STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

In Re: Shelby Green		Case No.: FEC 21-246	
	•	/	
TO:	Shelby Green	Division of Elections	
	PO Box 5651	500 South Bronough Street, Room	316
	Tallahassee, FL 32314-5651	Tallahassee, FL 32399	

NOTICE OF HEARING (PROBABLE CAUSE DETERMINATION)

A hearing will be held in this case before the Florida Elections Commission on, May 16, 2023 at 8:30, or as soon thereafter as the parties can be heard, at the following location: Join Zoom Meeting:

https://us06web.zoom.us/meeting/register/tZMpdumuqTsqGt1MNuvpQBOl5XPapAI 9zfC

 Audio Participation:
 Meeting ID:
 Passcode:

 Dial: 1 301 715 8592
 874 1067 0009
 772737

After registering, you will receive a confirmation email containing information about joining the meeting.

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

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

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

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

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

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

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

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

See further instructions on the reverse side.

Tim Vaccaro

Executive Director Florida Elections Commission May 2, 2023 Please refer to the information below for further instructions related to your particular hearing:

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

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

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

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

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

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

STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

In Re:	Shelby Green		Case No.:	FEC 21-246
		_/		

STAFF RECOMMENDATION FOLLOWING INVESTIGATION

Pursuant to Section 106.25(4)(c), Florida Statutes, undersigned staff counsel files this written recommendation for disposition of the referral in this case recommending that there is **probable cause** to charge Respondent with violating **Sections 106.07(5)**, and **106.19(1)(c)**, **Florida Statutes**. Based upon a thorough review of the Report of Investigation submitted on February 6, 2023, the following facts and law support this staff recommendation:

- 1. On March 15, 2021, the Florida Elections Commission ("Commission") received a referral from the Department of State, Division of Elections ("Division"), alleging that Shelby Green ("Respondent") violated Chapter 106, Florida Statutes.
- 2. Respondent was the treasurer for Randolph Bracy, a 2020 candidate for State Senator, District 11. (ROI Exhibit 1)¹
- 3. By letter dated December 13, 2021, the Executive Director notified Respondent that Commission staff would investigate the following statutory provisions:

Section 106.07(5), Florida Statutes: Respondent, in her capacity as treasurer for Randolph Bracy, a 2020 candidate for State Senator, District 11, may have certified the campaign's 2021 TR report was true, correct, and complete when it was not, as alleged in the complaint.

Section 106.19(1)(c), Florida Statutes: Respondent, in her capacity as treasurer for Randolph Bracy, a 2020 candidate for State Senator, District 11, may have falsely reported or deliberately failed to include information in the campaign's 2021 TR report required by Chapter 106, Florida Statutes, as alleged in the complaint.

4. On November 14, 2017, Randolph Bracy filed his Appointment of Campaign Treasurer and Designation of Campaign Depository for Candidates form ("DS-DE 9") appointing Respondent as treasurer for his campaign. (ROI Exhibit 1)

Staff Recommendation FEC 21-246

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

- 5. By letter dated November 15, 2017, Kristi Reid Willis, Chief, Bureau of Election Records, sent Respondent a letter acknowledging that the Division had received Mr. Bracy's DS-DE 9. (ROI Exhibit 2)
- 6. The acknowledgment letter provided Respondent with a confidential pin number to grant access to the electronic filing system ("EFS"). The letter advised Respondent that all of the Division's publications and reporting forms were available on its website and directed Respondent to print out the *Calendar of Reporting Dates* as well as other relevant documents. (ROI Exhibit 2)

Alleged Violation: Section 106.07(5), Florida Statutes

- 7. Complainant alleged that Respondent violated Florida's election laws by certifying that the campaign's amended 2021 TR Report was true, correct, and complete when it was not.
- 8. Under Section 106.07, Florida Statutes, a campaign treasurer's report is required to contain all contributions received and all expenditures made during the reporting period. Additionally, Section 106.07(4)(a), Florida Statutes, provides that each report must also contain the full name, address, and occupation or description of business, together with the amount and date of such contributions, and the full name and address to whom expenditures have been made along with the amount, date, and purpose for said expenditures.
- 9. The campaign's 2021 TR Report was due on February 1, 2021. (ROI Exhibit 3; ROI Exhibit 4, page 1) On February 2, 2021, Respondent filed the original report. (ROI Exhibit 6, page 1) On the same day, Respondent filed an amended 2021 TR Report and certified the report as true, correct, and complete. (ROI Exhibit 6, page 1) The campaign's report was incomplete as Respondent failed to report contributions and expenditures as evidenced by the filing of a second amended report. (ROI Exhibits 5-7) (See ROI, p. 2, \P 6)
- 10. Respondent acknowledged that she amended reports with large amounts of activity due to a lack of knowledge of Chapter 106, Florida Statutes, a lack of consistent assistance, unawareness of the financial activity until the last minute, unawareness of the high volume of activity until the last minute, and a lack of preparedness for the accelerated reporting schedule. (ROI Exhibit 8, page 2)
- 11. Respondent stated that she did not have access to the candidates' and committees' bank accounts but had to wait to receive information from the parties. (ROI Exhibit 9, page 3) She stated that she would receive large batches of check images at the last minute or the day before the reports were due. (ROI Exhibit 8, page 2; ROI Exhibit 9, page 3)
- 12. Respondent stated that she had volunteers assisting her, but many dropped out and the person assisting her was no longer available pre-election during the weekly reporting periods. (ROI Exhibit 8, page 2; ROI Exhibit 9, page 3)
- 13. Respondent stated that she was overwhelmed by the amount of financial activity that she was required to report. She stated that she prioritized filing the reports timely. She knew

that all reportable financial activity should have been disclosed on the original report but input as much information as possible before filing the reports. (ROI Exhibit 9, page 3)

- 14. Respondent stated that it was her understanding that if she did not file the report by the due date that the candidate or committee would be assessed a fine; however, she thought it was acceptable to file an amended report to add information as long as the original report was timely filed. (ROI Exhibit 9, page 3)
- 15. Respondent certified that the campaign's amended 2021 TR Report was true, correct, and complete when it was not.

Alleged Violation: Section 106.19(1)(c), Florida Statutes

- 16. Complainant alleged that Respondent violated Florida's election laws by falsely reporting or deliberately failing to include information required by Chapter 106, Florida Statutes. The reporting period at issue is the 2021 TR reporting period which ran from October 30, 2020, through February 1, 2021.
- 17. The campaign's 2021 TR Report was due on February 1, 2021 and was filed one day late. (ROI Exhibit 4, page 1) The original report disclosed one expenditure in the amount of \$100. (ROI Exhibit 6, page 2) The amended report disclosed one expenditure in the amount of \$9,000. The amendment changed the date, full name, address, purpose, and amount of the original expenditure. (ROI Exhibit 6, page 2) On February 22, 2021, 21 days after the due date of the report, Respondent filed a second amended 2021 TR Report disclosing an additional 4 monetary contributions totaling \$1.18, and 15 expenditures totaling \$45,330.16. (ROI Exhibit 5; ROI Exhibit 6, pages 3-4)
- 18. Chapter 106, Florida Statutes, requires treasurers to report any contributions received and any expenditures made for the purpose of influencing the results of an election.
- 19. Respondent deliberately failed to include information required by Chapter 106, Florida Statutes, on the campaign's 2021 TR Report.
- 20. "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).
- 21. The facts set forth above show that Respondent was the treasurer for Randolph Bracy, a 2020 candidate for State Senator, District 11. Respondent certified that the campaign's amended 2021 TR Report was true, correct, and complete when it was not. Respondent deliberately failed to include information required by Chapter 106, Florida Statutes, on the campaign's 2021 TR Report.

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

Count 1:

On or about February 2, 2021, Shelby Green, violated Section 106.07(5), Florida Statutes, when she certified that Randolph Bracy's amended 2021 TR Report was true, correct, and complete when it was not.

Count 2:

On or around February 2, 2021, Shelby Green, violated Section 106.19(1)(c), Florida Statutes, when she deliberately failed to include information required by Chapter 106, Florida Statutes, on Randolph Bracy's 2021 TR Report.

Respectfully submitted on April 11, 2023.

Stephanie J. Cunningham

General Counsel

I reviewed this Staff Recommendation this // day of April 2023.

Tim Vaccaro

Executive Director

FLORIDA ELECTIONS COMMISSION

Report of Investigation for Late-Reported Financial Activity

Case Number: FEC 21-246

Sections 106.07(5), and 106.19(1)(c), Florida Statutes, a treasurer for a candidate or political committee certified campaign treasurer report(s) as true, correct, and complete when they were not, and falsely reported or deliberately failed to include all information required by Chapter 106, F.S., in campaign treasurer report(s).

Respondent: Shelby Green **Respondent's Atty:** N/A

Division of Elections (Division) Referral Filed: March 15, 2021

Respondent Type: Treasurer for Candidate

I. Preliminary Information:

1. Respondent was the appointed campaign treasurer for Randolph Bracy, a 2020 candidate for State Senate, District 11. The Appointment of Campaign Treasurer and Designation of Campaign Depository (DS-DE 9) appointing Respondent was filed on November 14, 2017. To review the DS-DE 9, refer to Exhibit 1.

2. On November 15, 2017, the Division sent Respondent a letter acknowledging Respondent's appointment as the campaign treasurer for Randolph Bracy's campaign. The letter advised Respondent that all of the Division's publications and reporting forms are available on their website, including Chapter 106, Florida Statutes, the *Candidate and Campaign Treasurer Handbook*, and the *Calendar of Reporting Dates*. The letter further advised that it was Respondent's responsibility to read, understand, and follow the requirements of Florida's election laws. To review the acknowledgement letter, refer to Exhibit 2. To review the 2020 *Calendar of Reporting Dates*, refer to Exhibit 3.

II. Alleged Violation of Sections 106.07(5), and 106.19(1)(c), Florida Statutes:

- 3. I investigated whether Respondent violated these sections of the election laws by certifying that one or more campaign treasurer report(s) were true, correct, and complete when they were not, and falsely reporting or deliberately failing to include information in one or more campaign treasurer report(s).
- 4. Specifically, the referral alleged Respondent filed one or more original campaign treasurer report(s) that did not include certain financial transactions, which Respondent added to amended report(s) filed after the due date(s). The referral was only concerned with certain specified total contribution(s) and/or expenditure(s) added to certain amended report(s) and essentially alleged that by adding this activity to amended report(s) filed after the due date(s), Respondent demonstrated that she failed to report those transactions by the designated due date(s). The report at issue is: 2021 TR (Termination Report). To review the filing history, refer to Exhibit 4.
- 5. The 2021 TR was due on February 1, 2021. Respondent filed it on February 2, 2021, which was one day late. By filing the report, Respondent certified that it was true, correct, and complete. The report showed no monetary contributions, no in-kind contributions, and one monetary expenditure in the amount of \$9,000.00. To review the 2021 TR, refer to Exhibit 5. To review Division records evidencing when the activity referenced in this paragraph was filed on the amended report, refer to Exhibit 6, pages 1-2.

¹ Respondent filed the original 2021 TR on February 2, 2021, at 12:00 a.m. The only transaction disclosed was a \$100.00 expenditure. The amended report at issue was filed on the same date at 8:07 a.m., and the \$100.00 expenditure was updated and replaced with the \$9,000.00 expenditure. The original TR is not at issue in the referral.

- 6. On February 22, 2021, which was 21 days after the due date for the report, Respondent filed an amended 2021 TR adding four monetary contributions in the total amount of \$1.18, and 15 monetary expenditures in the total amount of \$45,330.16. To review the 2021 TR, refer to Exhibit 5. To review Division records evidencing when the activity referenced in this paragraph was filed on the amended report, refer to Exhibit 6, pages 3-4. To review the applicable bank records, refer to Exhibit 7.²
- 7. On October 5, 2022, the Florida Elections Commission received a written response from Respondent, who stated that she served as treasurer for many candidates and committees during the past two election cycles. Respondent stated that she learned the EFS but was not well-versed with the election statutes and did not readily know the frequency and periodic quickening of reporting dates. Respondent explained that it became apparent she needed assistance, but the help she received was not constant and, "tapered off when I needed it the most," such as during pre-election weekly reporting and when termination reports were due. She added that it was not uncommon for candidates and committees to send her large batches of check images at the last minute, which prevented her from completing and filing reports timely and accurately. Respondent summarized the following factors that contributed to her amending reports after the due date to disclose sometimes large amounts of additional activity: lack of thorough knowledge of Chapter 106, Florida Statutes; lack of consistent and continued help with reports; lack of awareness of often high-volume financial activity until the last minute; and lack of preparation for quickened reporting dates. Respondent concluded by stating she has, "learned that these lessons come at a high price." To review Respondent's response, refer to Exhibit 8.
- 8. I called Respondent and interviewed her on two occasions in order to provide her an opportunity to respond to the referral. Respondent stated that she has never run for public office, though she has served as treasurer for several candidates and political committees. Respondent stated that she had not read Chapter 106, Florida Statutes, and that while she had not read the entire *Candidate and Campaign Treasurer Handbook*, she referred to it if she had any questions. To review the phone log, refer to Exhibit 9, interviews 1 and 3.
- 9. When asked if she was aware that all financial activity should be included on the original report, Respondent answered affirmatively. However, she added that it was her understanding that the campaign would be assessed a fine if a report was late, but that it was alright to amend a report if the original had been timely filed. Respondent stated she would input as much information as possible before filing the original report and would file an amended report to include information not on the original. To review the phone log, refer to Exhibit 9, interviews 1 and 3.
- 10. Respondent explained that she initially had several people working with her to enter information into EFS, but later the volunteers dropped out, which left her to do everything. She explained that she became overwhelmed by the amount of activity that occurred in each campaign, that in many instances she did not have access to campaign accounts, and that sometimes candidates and committees sent her incomplete information and/or would not send her information until the day before a report was due. Respondent indicated that, being overwhelmed, she prioritized filing original reports on time. She explained that she wanted to be transparent, so she reported the information she had and added the rest later. To review the phone log, refer to Exhibit 9, interviews 1 and 3.

THIS SPACE INTENTIONALLY LEFT BLANK

-

² I subpoenaed campaign account records from the designated campaign depository.

11. When asked if she considered resigning as treasurer from some campaigns due to feeling overwhelmed, Respondent stated that she thought about it but did not want to leave candidates in a bad situation with no one to help them. However, Respondent indicated that she did not discuss her situation with any of the candidates. Respondent asserted that she has taken the following corrective measures: reading Chapter 106, Florida Statutes; reading the *Handbook*; hiring an assistant to help her input information; requiring access to campaign accounts; and requesting that candidates and committees use Truist as their depository so she can monitor the account activity electronically. To review the phone log, refer to Exhibit 9, interviews 1 and 3.

SIGNATURE OF INVESTIGATOR: Date: February 6, 2023

FLORIDA ELECTIONS COMMISSION

REPORT OF INVESTIGATION

Shelby Green -- FEC 21-246

LIST OF EXHIBITS					
Exhibits #s	Description of Exhibits				
Exhibit 1	DS DE 9				
Exhibit 2	Acknowledgement Letter				
Exhibit 3	2020 Reporting Dates				
Exhibit 4	Filing History				
Exhibit 5	2021 TR				
Exhibit 6	2021 TR DPA Report				
Exhibit 7	Bank Records				
Exhibit 8	Respondent's Written Response				
Exhibit 9	Phone Log				

APPOINTMENT OF CAMPAIGN TREASURER AND DESIGNATION OF CAMPAIGN DEPOSITORY FOR CANDIDATES

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

(PLEASE PRINT OR TYPE)

DS-DE 9 (Rev. 10/10)

RECEIVED
DEPARTMENT OF STATE

2817 NOV 14 PM 2: 04

DIVISION OF ELECTIONS

NOTE: This form must be on file with the qualifying officer before opening the campaign account. OFFICE USE ONLY 1. CHECK APPROPRIATE BOX(ES): Treasurer/Deputy Initial Filing of Form Re-filing to Change: 🔽 Depository Office 2. Name of Candidate (in this order: First, Middle, Last) 3. Address (include post office box or street, city, state, zip P.O. Box 521 Ocoee, FL 34761 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 12. Telephone (850) 661 3941 17. E-mail address 16. Zip Code 15. State 32314 SBSLLC 2017painai Primary Depository Secondary Depository 18. I have designated the following bank as my 20. Address 19. Name of Bank 23. State 21. City 22. County Lou 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 Signature of Candidate Treasurer's Acceptance of Appointment (fill in the blanks and check the appropriate block) 27. do hereby accept the appointment (Please Print or Type Name) Campaign Treasurer Deputy Treasurer. designated above as: of Campaign Treasurer or Deputy Treasurer

Rule 1S-2,0001, F.A.C.



RICK SCOTT Governor KEN DETZNER
Secretary of State

November 15, 2017

Shelby Green, Treasurer Post Office Box 5651 Tallahassee, Florida 32314

Dear Ms. Green:

Your appointment as campaign treasurer for Randolph Bracy was filed in this office on November 14, 2017. Enclosed is a security envelope containing your confidential pin number to access the Division's Electronic Filing System (EFS) for submitting campaign treasurer's reports.

All of the Division's publications and reporting forms are available on the Division of Elections' website at http://dos.myflorida.com/elections/. It is your responsibility to read, understand, and follow the requirements of Florida's election laws. Therefore, please print a copy of the following documents: Chapters 104 and 106, Florida Statutes, Candidate and Campaign Treasurer Handbook, Calendar of Reporting Dates, and Rule 1S-2.017, Florida Administrative Code.

If you have questions concerning the EFS, you may call the Help Desk at (850) 245-6280.

Sincerely,

Kristi Reid Willis, Chief Bureau of Election Records

KRW/mcc

Enclosure

pc: Senator Randolph Bracy (69607)

+ Preid Willis

9 FLORIDA ELECTIONS

Calendar of Reporting Dates for 2020 Candidates

registered with the Division of Elections

Report Code	Cover Period	<u>Due Date</u>
2019 M12	12/1/19 - 12/31/19	1/10/2020
2020 M1	1/1/20 - 1/31/20	2/10/2020
2020 M2	2/1/20 - 2/29/20	3/10/2020
2020 M3	3/1/20 - 3/31/20	4/10/2020
2020 M4	4/1/20 - 4/30/20	5/11/2020
2020 M5	5/1/20 - 5/31/20	6/10/2020
2020 P1	6/1/20 - 6/12/20	6/19/2020
2020 P2	6/13/20 – 6/26/20	7/3/2020
2020 P3	6/27/20 – 7/10/20	7/17/2020
2020 P4	7/11/20 – 7/17/20	7/24/2020
2020 P5	7/18/20 – 7/24/20	7/31/2020
2020 P6	7/25/20 – 7/31/20	8/7/2020
2020 P7	8/1/20 - 8/13/20	8/14/2020
2020 G1	8/14/20 - 8/21/20	8/28/2020
2020 G2	8/22/20 – 9/4/20	9/11/2020
2020 G3	9/5/20 – 9/18/20	9/25/2020
2020 G4	9/19/20 – 10/2/20	10/9/2020
2020 G5	10/3/20 - 10/16/20	10/23/2020
2020 G6	10/17/20 – 10/29/20	10/30/2020

Termination Reports

Report Code	Cover Period	<u>Due Date</u>
TR	After April Qualifying	7/23/2020
TR	After June Qualifying	9/10/2020
TR	Primary Election	11/16/2020
TR	General Election	2/1/2021



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

Florida Department of State - Division of Elections

Florida Election System Reports

Ca	indidate/Com	mittee Loo	kup
Name:			
Election:			
			~
Acct:	69607		
Type:	Candidate		~
	Search	Reset	

Candidate Name: Randolph Bracy
Account: 69607

Date Due Type	Date Filed S	Status	Days Late	Fine Assessed	Appealed	Amount Fined	Amount Paid
10/30/2020 G6 10/23/2020 G5 10/9/2020 G4 9/25/2020 G3 9/11/2020 G2	2/2/2021 10/30/2020 10/23/2020 10/9/2020 9/25/2020 9/11/2020 8/28/2020	CLO	1	\$25.00		\$25.00	\$25.00
8/7/2020 P6 7/31/2020 P5 7/24/2020 P4 7/17/2020 P3 7/3/2020 P2 6/19/2020 P1 6/10/2020 M5 5/11/2020 M4	8/15/2020 8/7/2020 7/31/2020 7/24/2020 7/17/2020 7/3/2020 6/19/2020 6/10/2020 5/11/2020 4/10/2020	CLO	1	\$375.00		\$0.00	\$0.00
2/10/2020 M1 1/10/2020 M12 12/10/2019 M11 11/12/2019 M9 9/10/2019 M8 8/12/2019 M7 7/10/2019 M6 6/10/2019 M5 5/10/2019 M4 4/10/2019 M3 3/11/2019 M2	11/12/2019 10/10/2019 9/10/2019 8/12/2019 7/10/2019 6/10/2019 5/10/2019 4/10/2019 3/11/2019 2/11/2019 1/10/2019	CLO	1	\$25.00		\$25.00	\$25.00
8/10/2018 M7 7/10/2018 M6 6/11/2018 M5 5/10/2018 M4 4/10/2018 M3		CLO	1	\$0.00		\$0.00	\$0.00

FEC - Candidate/Committee Filing History Report

2/12/2018	M1	2/12/2018					
1/10/2018	M12	1/10/2018					
12/11/2017	M11	12/11/2017					
11/13/2017	M10	11/13/2017					
10/10/2017	М9	10/11/2017	DFS	1	\$50.00	\$50.00	\$0.00
9/22/2017	M8	9/9/2017					
8/10/2017	М7	8/4/2017					
7/10/2017	М6	7/4/2017					
6/12/2017	М5	6/9/2017					
5/10/2017	M4	5/11/2017	DFS	1	\$50.00	\$50.00	\$0.00
4/10/2017	МЗ	4/10/2017					
3/11/2017	M2	3/10/2017					
2/10/2017	M1	2/14/2017	CLO	4	\$0.00	\$0.00	\$0.00

FLORIDA DEPARTMEN CAMPAIGN TRE	T OF STATE, DIVI ASURER'S REPO		IONS	
(1) Randolph Bracy Candidate, Committe or Party Name	(2)	69607 I.D. Number		
(3) 1820 Merrivale Loop	Ocoee	FL	34761	
Address (number and street) Check box if address has changed since last report	City	State	Zip Code	
(4) Check appropriate box(es):				
 X Candidate (office sought): ☐ Political Committee ☐ Committee of Continuous Existance ☐ Party Executive Committee 	=	has DISBANDED E has DISBANDED		
(5) REPOI	RT IDENTIFIERS			
Cover Period: From 10/30/2020 To 02	/01/2021	Report Type:	TR	
☐ Original Sp	ecial Election Report			
(6) CONTRIBUTIONS THIS REPORT	(7) EXPENDITURES 1	THIS REPORT	
Cash & Checks \$1.18	Monetary Expen	ditures	\$54,330.16	
Loans \$0.00	Transfers to Office	ce Account	\$0.00	
Total Monetary \$1.18	Total Mone	etary	\$54,330.16	
In-Kind \$0.00	(8) Other Distribu	utions		
Ce It is a first degree misdemeanor for any p	ertification person to falsify a publ	ic record (ss.839.13,	F.S.)	
I certify that I have examined this report and it is true, correct and complete	I certify that I have true, correct and	ve examined this repo complete	ort and it is	
Name of Treasurer Deputy Treasurer	Name of X	Candidate	Chaiman (PC/PTY Only	
x	x			
Signature	Signature			

Prepared on: 3/11/21 9:28:10AM

Reviewed On: 2/22/21 5:11 pm

ID: 69607

CAMPAIGN TREASURER'S REPORT - ITEMIZED EXPENDITURES

Page 1 ot 1

Name: Randolph Bracy

Report: 2021 TR

Period: 10/30/2020

to 02/01/2021

**	Recor	ds ir	ı Filed	l Report	**
----	-------	-------	---------	----------	----

Seq#	Full Name				Amount
Date Date	(Last, Suffix, First, Middle Street Address & City, State, Zip	Туре	Purpose	Amend	
1	EDUMATICS KNOWLEDGE SHOP	MON	EDUCATION RESEARCH/CONSULTING		\$9,000.0
01/31/2021	7649 W COLONIAL DR ORLANDO, FL 32818	IVION	EDUCATION REGEARCH/CONSCILING	UPD	
1	SB SOLIUTIONS CONSULTING	×			\$100.0
11/01/2020		^		History 0	2/02/21
2	DJ IVORY ENT LLC	MON	EVENT ENTERTAINMENT	· · · ·	\$300.0
10/30/2020	12575 NW 27TH AVE APT # 203 MIAMI, FL 33167	MON		ADD	
3	JEFFERSON KENDRA 5987 LEE VISTA BLVD	MON	GRAPHIC DESIGN		\$5,000.0
10/30/2020	ORLANDO, FL 32822			ADD	
4	BREAKFAST CLUB OF OCOEE	MON	FOOD & BEVERAGES		\$27.4
11/04/2020	267 WEST RD, OCOEE, FL 34761 OCOEE, FL 34761	I WICH		ADD	
5	4RIVERS SMOKEHOUSE	MON	FOOD & BEVERAGES		\$157.3
11/05/2020	1047 S DILLARD ST, WNTER GARDEN, FL 34787	MON	1000 d DEVELVOES	ADD	
6	HOLMES ENTERTAINMENT		MDECODARING		\$1,317.9
11/01/2020	1437 CAPE COVE BLVD	MON	VIDEOGRAPHY	ADD	
7	ORLANDO, FL 32808 MCWHITE SHARON	_		ADD	\$140.0
	8350 SANDBERRY BLVD	MON	SPONSORSHIP	455	Ψ1-10.0
11/01/2020 8	ORLANDO, FL 32819 PUBLIX		~	ADD	¢200 1
	7524 DR. PHILLIPS BLVD	MON	EVENT SUPPLIES		\$208.1
11/18/2020	ORLANDO, FL 32819			UPD	
8	PUBLIX 7524 DR. PHILLIPS BLVD	MON	EVENT SUPPLIES	1	\$206.9
11/18/2020	ORLANDO, FL 32819	·		ADD Histo	ory 02/22/2
9	HOLMES ENTERTAINMENT 1437 CAPE COVE BLVD	MON	VIDEOGRAPHY		\$1,250.0
11/20/2020	ORLANDO, FL 32808			ADD	
10	STALNECKER CHRISTIAN	MON	MARKETING CONSULTING		\$5,000.0
11/27/2020	11 S WESTERN AVE NASHVILLE, TN 37210	WON		ADD	
11	KM CREATIVE WORKS LLC	14011	COCIAL MEDIA & MARKETING	\$	10,000.0
11/03/2020	5987 LEE VISTA BLVD ORLANDO, FL 32822	MON	SOCIAL MEDIA & MARKETING	ADD	
12	JEFFERSON KENDRA				\$1,800.0
12/01/2020	5987 LEE VISTA BLVD	MON	GRAPHIC DESIGN	ADD	• •,
13	ORLANDO, FL 32822 SB SOLUTIONS CONSULTING				\$1,093.2
	PO BOX 5651	MON	TREASURY & COMPLIANCE	i	Ψ1,033.2
12/01/2020	TALLAHASSEE, FL 32314			ADD	£440.7
14	AVIS 3400 E SKY HARBOR BLVD, PHOENIX, AZ, 85034	MON	TRAVEL	1.55	\$143.7
01/25/2021 15	PHOENIX, AZ 85034			ADD	0000
12/01/2020	FROM THE HEART CHARITABLE FUND 1200 PREMIER DR STE 260	DIS	DISPOSITION OF FUNDS TO CHARITABLE ORGANIZATION	ADD	\$9,000.0
16	CHATTANOOGA, TN 37421 A TOTAL CONSULTING GROUP				\$9,892.3
	211 MAIN ST	MON	MARKETING CONSULTING		ψ υ,υυ Σ.υ
11/20/2020	WINDERMERE, FL 34786	L		ADD	

Queued Items for 2021-TR

Account: 69607

STS 011 Randolph Bracy

Rpt Seq: 55

ProcessDescription	Status	Submitter	Created	LastUpdate
Create Pending Report	Processing Complete	69607	2/2/2021 12:00:06 AM	2/2/2021 12:00:06 AM
File Pending Report	Processing Complete	69607	2/2/2021 12:00:40 AM	2/2/2021 12:00:40 AM
Amend Filed Report	Processing Complete	69607	2/2/2021 8:04:36 AM	2/2/2021 8:04:36 AM
Review Pending Report	Processing Complete	69607	2/2/2021 8:06:59 AM	2/2/2021 8:06:59 AM
File Pending Report	Processing Complete	69607	2/2/2021 8:07:22 AM	2/2/2021 8:07:22 AM
Amend Filed Report	Processing Complete	69607	2/2/2021 8:07:35 AM	2/2/2021 8:07:35 AM
Review Pending Report	Processing Complete	69607	2/8/2021 10:56:46 PM	2/8/2021 10:56:46 PM
Review Pending Report	Processing Complete	69607	2/22/2021 4:52:34 PM	2/22/2021 4:52:34 PM
Review Pending Report	Processing Complete	69607	2/22/2021 4:55:54 PM	2/22/2021 4:55:54 PM
Review Pending Report	Processing Complete	69607	2/22/2021 5:06:04 PM	2/22/2021 5:06:04 PM
Review Pending Report	Processing Complete	69607	2/22/2021 5:06:23 PM	2/22/2021 5:06:23 PM
Review Pending Report	Processing Complete	69607	2/22/2021 5:07:20 PM	2/22/2021 5:07:20 PM
File Pending Report	Processing Complete	69607	2/22/2021 5:09:04 PM	2/22/2021 5:09:04 PM
Amend Filed Report	Processing Complete	69607	2/22/2021 5:10:09 PM	2/22/2021 5:10:09 PM
Review Pending Report	Processing Complete	69607	2/22/2021 5:11:03 PM	2/22/2021 5:11:03 PM
File Pending Report	Processing Complete	69607	2/22/2021 5:11:27 PM	2/22/2021 5:11:27 PM

Filed Campaign Treasurer's Report

Randolph Bracy 69607 - STS 011 Elect ID: **20201103-GEN**Report: **2021 TR (55)**

From: 10/30/202 To: 2/1/2021 Amd: Y Wvr: N
Cmplt: COM Re

Filed: FIL 2/2/2021 12:00:40 A

Reviewed: AUD 2/22/2021 5:11:03 P

Original Report

Submitted: 2/2/2021 12:00:40 A

EXPENDITURES

Seq			Office			Errors		
Date	Name	Address	Type	Purpose	Amd	Amount		
1	SB SOLIUTIONS CONSULTING		X		5	\$100.00		
11/1/2020								

Amended Report

Submitted: 2/2/2021 8:07:22 AM

EXPENDITURES

Seq						Office	Errors	
Date	Name	Address			Туре	Purpose	Amd	Amount
1	EDUMATICS KNOWLEDGE SHOP	7649 W COLON	AL DR		MON		0	\$9,000.00
1/31/2021		ORLANDO	FL	32818		EDUCATION RESEARCH/CONSULTING	UPD	

Exhibit 6 Page 3 of 4

Filed Campaign Treasurer's Report

Randolph Bracy 69607 - STS 011

Elect ID: 20201103-GEN Report: 2021 TR (55)

From: 10/30/202

Amd: Y Wvr: N Filed: FIL 2/2/2021 12:00:40 A

Reviewed: AUD 2/22/2021 5:11:03 P Cmplt: COM To: 2/1/2021

Amended Report

Submitted: 2/22/2021 5:09:04 P

CONTRIBUTIONS

Seq			Contributor	Occupation	Errors	
Date	Name	Address	Туре	Inkind Description	Amd	Amount
1	SUNTRUST	303 PEACHTREE ST	В	FINANCIAL INSTITUTION	0	\$0.25
12/31/2020		ATLANTA GA 38308	INT		ADD	
2	SUNTRUST	303 PEACHTREE ST	В	FINANCIAL INSTITUTION	0	\$0.21
1/29/2021		ATLANTA GA 38308	INT		ADD	
3	SUNTRUST	303 PEACHTREE ST	В	FINANCIAL INSTITUTION	0	\$0.40
11/30/2020		ATLANTA GA 38308	INT		ADD	
4	SUNTRUST	303 PEACHTREE ST	В	FINANCIAL INSTITUTION	0	\$0.32
10/30/2020		ATLANTA GA 38308	INT		ADD	

EXPENDITURES

Seq						Office	Errors	
Date	Name	Address			Type	Purpose	Amd	Amount
2	DJ IVORY ENT LLC	12575 NW 27TH	AVE APT	Γ# 203	MON		0	\$300.00
10/30/2020		MIAMI	FL	33167		EVENT ENTERTAINMENT	ADD	
3	JEFFERSON	5987 LEE VISTA	BLVD		MON		0	\$5,000.00
10/30/2020	KENDRA	ORLANDO	FL	32822		GRAPHIC DESIGN	ADD	
4	BREAKFAST CLUB OF OCOEE	267 WEST RD, C	COEE, F	L 34761	MON		0	\$27.46
11/4/2020		OCOEE	FL	34761		FOOD & BEVERAGES	ADD	
5	4RIVERS SMOKEHOUSE	1047 S DILLARD	ST,		MON		0	\$157.31
11/5/2020		WINTER GARDI	E FL	34787		FOOD & BEVERAGES	ADD	
6	HOLMES ENTERTAINMENT	1437 CAPE COV	E BLVD		MON		0	\$1,317.92
11/1/2020		ORLANDO	FL	32808		VIDEOGRAPHY	ADD	
7	MCWHITE	8350 SANDBERI	RY BLVD)	MON		0	\$140.00
11/1/2020	SHARON	ORLANDO	FL	32819		SPONSORSHIP	ADD	
8	PUBLIX	7524 DR. PHILLI	PS BLVD)	MON		0	\$206.95
11/18/2020		ORLANDO	FL	32819		EVENT SUPPLIES	ADD	
9	HOLMES ENTERTAINMENT	1437 CAPE COV	E BLVD		MON		0	\$1,250.00
11/20/2020		ORLANDO	FL	32808		VIDEOGRAPHY	ADD	
10	STALNECKER	11 S WESTERN	AVE		MON		0	\$5,000.00
11/27/2020	CHRISTIAN	NASHVILLE	TN	37210		MARKETING CONSULTING	ADD	

Filed Campaign Treasurer's Report

Randolph Bracy 69607 - STS 011 Elect ID: **20201103-GEN**Report: **2021 TR (55)**

From: 10/30/202 To: 2/1/2021 Amd: Y Wvr: N
Cmplt: COM R

Filed: FIL 2/2/2021 12:00:40 A

Reviewed: **AUD** 2/22/2021 5:11:03 P

Amended Report

Submitted: 2/22/2021 5:09:04 P

EXPENDITURES

Seq Date	Name	Address			Type	Office Purpose	Errors Amd	Amount
11	KM CREATIVE WORKS LLC	5987 LEE VISTA B	LVD		MON		0	\$10,000.00
11/3/2020		ORLANDO	FL	32822		SOCIAL MEDIA & MARKETING	ADD	
12	JEFFERSON	5987 LEE VISTA B	LVD		MON		0	\$1,800.00
12/1/2020	KENDRA	ORLANDO	FL	32822		GRAPHIC DESIGN	ADD	
13	SB SOLUTIONS CONSULTING	PO BOX 5651			MON		0	\$1,093.20
12/1/2020		TALLAHASSEE	FL	32314		TREASURY & COMPLIANCE	ADD	
14	AVIS	3400 E SKY HARB	OR BL	VD, PHOENIX, A	MON		0	\$143.76
1/25/2021		PHOENIX	ΑZ	85034		TRAVEL	ADD	
15	FROM THE HEART CHARITABLE F	1200 PREMIER DR	STE 2	60	DIS		0	\$9,000.00
12/1/2020		CHATTANOOGA	TN	37421		DISPOSITION OF FUNDS TO CHARITABLE ORGANIZATION	ADD	
16	A TOTAL CONSULTING GROUP	211 MAIN ST			MON		0	\$9,892.38
11/20/2020		WINDERMERE	FL	34786		MARKETING CONSULTING	ADD	

Amended Report

Submitted: 2/22/2021 5:11:27 P

EXPENDITURES

Seq						Office	E	rrors	
Date	Name	Address			Type	Purpose	A	md	Amount
8	PUBLIX	7524 DR. PHILLIE	PS BLVD		MON		-	0	\$208.13
11/18/2020		ORLANDO	FL	32819		EVENT SUPPLIES	Ţ	JPD	

SUNTRUST BANK PO BOX 305183 NASHVILLE TN 37230-5183 PAGE 1 OF 2 34/B36/0175/0 /31

10/30/2020

ACCOUNT STATEMENT

RANDOLPH BRACY OR SHELBY GREEN SENATE ACOUNT 5315 WOODSTEAD WAY ORLANDO FL 32819-3934 QUESTIONS? PLEASE CALL 1-800-786-8787

KEEP YOUR SUNTRUST ACCOUNTS SAFER.

USE UNIQUE USERNAMES AND PASSWORDS FOR YOUR ONLINE BANK ACCOUNTS.

IT'S BEST NOT TO RECYCLE THE SAME USERNAME AND PASSWORD ON MULTIPLE WEBSITES

WHERE YOU HAVE AN ONLINE PROFILE - ESPECIALLY YOUR FINANCIAL ACCOUNTS.

ALSO, TRY TO AVOID CHARACTERS FROM YOUR EMAIL, PHONE NUMBER, BIRTHDATE

OR OTHER PERSONAL INFORMATION.

ACCOUNT SUMMARY							
ACCOUNT TYPE	ACCOUNT NUM	MBER STATEMENT PERIOD	TAXPAYER ID				
ADVANTAGE CHECKING		10/01/2020 - 10/30/2020	177-68-4044				
DESCRIPTION	AMOUNT	DESCRIPTION	AMOUNT				
BEGINNING BALANCE	\$28,458.10	AVERAGE BALANCE	\$39,511.81				
DEPOSITS/CREDITS	\$29,650.32	AVERAGE COLLECTED BALANCE	\$38,706.81				
CHECKS	\$3,945.00	NUMBER OF DAYS IN STATEMENT PERIOD	30				
WITHDRAWALS/DEBITS	\$708.02	ANNUAL PERCENTAGE YIELD EARNED	.01%				
ENDING BALANCE	\$53,455.40	INTEREST PAID YEAR TO DATE	\$1.38				

OVERDRAFT PROTECTION
ACCOUNT NUMBER PROTECTED BY
NOT ENROLLED

DEPOSITS/CREDITS: 15

FOR MORE INFORMATION ABOUT SUNTRUST'S OVERDRAFT SERVICES, VISIT WWW.SUNTRUST.COM/OVERDRAFT.

		DEPOSITS/CREDITS		
DATE	AMOUNT	DESCRIPTION	SR	BATCH
10/05	2,500.00	DEPOSIT	20	00028303909
10/06	4,000.00	DEPOSIT	20	00028165228
10/08	1,000.00	DEPOSIT	20	00028084003
10/09	500.00	DEPOSIT	20	00028183888
10/14	5,500.00	DEPOSIT	20	00029142290
10/19	1,000.00	DEPOSIT	20	00028101834
10/20	1,000.00	DEPOSIT	20	00031025639
10/22	500.00	DEPOSIT	20	00030034097
L0/23		DEPOSIT	20	00031110953
L0/26	4,500.00	DEPOSIT	20	00031101940
10/27	5,000.00		20	00030110187
10/29	2,150.00	DEPOSIT	20	00029032856
10/29	500.00		20	00030104688
L0/30	1,000.00	DEPOSIT	20	00028065672
L0/30	.32	INTEREST PAID THIS STATEMENT THRU 10/3	0	

CHECKS
CHECK AMOUNT DATE SR BATCH CHECK AMOUNT DATE SR BATCH

NUMBER PAID NUMBER PAID NUMBER PAID 10/26 20 76002797 415 425.00 10/28 20 77027131 *385 1,250.00 10/15 20 75010158 416 300.00 10/29 20 74060471 *414 1,000.00 10/26 20 74075241

MEMBER FDIC

TOTAL ITEMS DEPOSITED: 35

CONTINUED ON NEXT PAGE

PAGE 2 OF 2 34/R36/0175/0 /31

10/30/2020

ACCOUNT STATEMENT

CHECKS

CHECKS: 5
* INDICATES BREAK IN CHECK NUMBER SEQUENCE. CHECK MAY HAVE BEEN PROCESSED ELECTRONICALLY AND LISTED AS AN ELECTRONIC/ACH TRANSACTION.

	WITHDRAWALS/DEBITS		
PAID	AMOUNT DESCRIPTION		BATCH
10/05	121.00 POINT OF SALE DEBIT TR DATE 10/02	82	
10/09	58.67 CHECK CARD PURCHASE TR DATE 10/08 DNH*GODADDY.COM 480-5058855 AZ	83	
10/13	55.21 CHECK CARD PURCHASE TR DATE 10/08 ROCCOS TACO AND TEQUIL ORLANDO FL	83	
10/19	126.40 CHECK CARD PURCHASE TR DATE 10/16 MR & MRS CRAB JUICY SE ORLANDO FL	83	
10/19	50.10 CHECK CARD FURCHASE IN DAIL 10/10	05	
10/19	17.24 CHECK CARD PURCHASE TR DATE 10/17 BREAKFAST CLUB OF OCOE OCOEE FL	83	
10/19	22.58 CHECK CARD PURCHASE TR DATE 10/17 REDBOX *DIGITAL 866-733-2693 WA	83	
10/22	MR & MRS CRAB JUICY SE ORLANDO FL 17.24 CHECK CARD PURCHASE	83	
10/22	12.17 CHECK CARD PURCHASE TR DATE 10/21 DNH*GODADDY.COM 480-5058855 AZ	83	
10/22	16.92 CHECK CARD PURCHASE TR DATE 10/21 BREAKFAST CLUB OF OCCE OCCEE FL	83	
	BREAKEAST CLUB OF OCCE OCCEE FL.		
10/26	20.00 POINT OF SALE DEBIT TR DATE 10/25 SHELL SERVICE LAKE WORTH FL 94665601	82	
10/28	20.00 POINT OF SALE DEBIT TR DATE 10/25 SHELL SERVICE LAKE WORTH FL 94665601 129.70 CHECK CARD PURCHASE TR DATE 10/26 SEASONS 52 0074501 ORLANDO FL	83	

WITHDRAWALS/DEBITS: 13

		BALANCE ACTI	VITY HISTOR	Y	
DATE	BALANCE	COLLECTED	DATE	BALANCE	COLLECTED
		BALANCE			BALANCE
10/01	28,458.10	28,458.10	10/20	42,256.84	41,256.84
10/05	30,837.10	28,837.10	10/21	42,256.84	42,256.84
10/06	34,837.10	33,837.10	10/22	42,665.75	42,165.75
10/07	34,837.10	34,837.10	10/23	43,149.78	42,649.78
10/08	35,837.10	34,837.10	10/26	45,659.78	42,159.78
10/09	36,278.43	35,778.43	10/27	50,659.78	48,659.78
10/13	36,223.22	36,223.22	10/28	50,105.08	50,105.08
10/14	41,723.22	36,723.22	10/29	52,455.08	49,805.08
10/15	40,473.22	40,473.22	10/30	53,455.40	52,455.40
10/19	41,256.84	40,256.84			

For more information, including details related to fees and balances, please sign on to Online Banking.

MEMBER FDIC

SUNTRUST BANK PO BOX 305183 NASHVILLE TN 37230-5183 PAGE 1 OF 2

11/30/2020

ACCOUNT STATEMENT

RANDOLPH BRACY OR SHELBY GREEN SENATE ACOUNT 5315 WOODSTEAD WAY ORLANDO FL 32819-3934 QUESTIONS? PLEASE CALL 1-800-786-8787

KEEP YOUR SUNTRUST ACCOUNTS SAFER.

USE UNIQUE USERNAMES AND PASSWORDS FOR YOUR ONLINE BANK ACCOUNTS.

IT'S BEST NOT TO RECYCLE THE SAME USERNAME AND PASSWORD ON MULTIPLE WEBSITES WHERE YOU HAVE AN ONLINE PROFILE - ESPECIALLY YOUR FINANCIAL ACCOUNTS.

ALSO, TRY TO AVOID CHARACTERS FROM YOUR EMAIL, PHONE NUMBER, BIRTHDATE OR OTHER PERSONAL INFORMATION.

ACCOUNT TYPE			SUMMARY ER STATEMENT	T PERTOD	TAXPAYER ID	
ADVANTAGE CHECKING				- 11/30/2020		
DESCRIPTION BEGINNING BALANCE DEPOSITS/CREDITS CHECKS WITHDRAWALS/DEBITS ENDING BALANCE	\$1	\$3,455.40 \$.40 .2,014.00 \$391.72	DESCRIPTION AVERAGE BALANCE AVERAGE COLLECTED BY NUMBER OF DAYS IN SO ANNUAL PERCENTAGE Y INTEREST PAID YEAR	ALANCE FATEMENT PERIOD IELD EARNED	AMOUNT \$47,681.80 \$47,617.28 31 .01% \$1.78	
ACCOUNT NUMBER		OVERDRAF PROTECTED BY NOT ENROLLED	T PROTECTION			
FOR MORE INFORMATION A	ABOUT SUNTRUS	T'S OVERDRAF	T SERVICES, VISIT WWW	W.SUNTRUST.COM/OV	ERDRAFT.	
DATE AMOUNT 11/30 .40 DEPOSITS/CREDITS: 1	INTEREST PA	DEPOSITS/O	MENT THRU 11/30		SR BATCH	
			S CHECK NUMBER 4 *417		DATE SR	
336 6. 337 1,2	250.00 11/23	20 75074634 20 76134863 20 7515611	3 418) 11/02 20) 11/16 20	
CHECKS: 5 * INDICATES BREAK IN CAND LISTED AS AN ELECT			ECK MAY HAVE BEEN PRO	OCESSED ELECTRONI	CALLY	
DATE AMOUNT	DESCRIPTION	WITHDRAWA	LS/DEBITS		SR BATCH	
11/04 27.46 t 11/05 157.31 t	BREAKFAST	CLUB OF OCOE	TR DATE OCOEE FI TR DATE WINTER GARDENFI		83 83	

MEMBER FDIC

CONTINUED ON NEXT PAGE

PAGE 2 OF 2 34/B36/0175/0 /31 6 11/30/2020

ACCOUNT STATEMENT

WITHDRAWALS/DEBITS

DATE AMOUNT DESCRIPTION SR BATCH PAID

PAID
11/18 206.95 POINT OF SALE DEBIT TR DATE 11/18 82
PUBLIX SUPER MAR ORLANDO FL P0436111

WITHDRAWALS/DEBITS: 3

BALANCE ACTIVITY HISTORY

DAME	BALANCE	COLLECTED	DATE	BALANCE	COLLECTED
DATE	BALANCE		DATE	DALANCE	
		BALANCE			BALANCE
10/31	53,455.40	52,455.40	11/16	47,506.63	47,506.63
11/02	48,455.40	48,455.40	11/18	47,299.68	47,299.68
11/04	48,427.94	48,427.94	11/23	46,049.68	46,049.68
11/05	48,270.63	48,270.63	11/30	41,050.08	41,050.08

For more information, including details related to fees and balances, please sign on to Online Banking.

MEMBER FDIC

PAGE 1 OF 2 34/B36/0175/0 /31

12/31/2020

ACCOUNT STATEMENT

RANDOLPH BRACY OR SHELBY GREEN SENATE ACOUNT 5315 WOODSTEAD WAY ORLANDO FL 32819-3934 QUESTIONS? PLEASE CALL 1-800-786-8787

EFFECTIVE DECEMBER 1, 2020, THE FOLLOWING CHANGES WILL BE MADE TO OUR FUNDS AVAILABILITY POLICY: WHEN A CASE-BY-CASE HOLD IS PLACED, THE FIRST \$225 OF YOUR DEPOSIT(S) WILL BE AVAILABLE NEXT DAY AND THE REMAINDER WILL BE AVAILABLE THE SECOND BUSINESS DAY AFTER THE DAY OF YOUR DEPOSIT. WHEN A LONGER DELAY IS PLACED ON YOUR DEPOSIT(S), THESE FUNDS WILL BE AVAILABLE NO LATER THAN THE 7TH BUSINESS DAY AFTER THE DAY OF YOUR DEPOSIT.

ADDITIONALLY, AS OF DECEMBER 1, 2020, CHANGES WILL BE MADE TO THE RULES AND REGULATIONS FOR DEPOSIT ACCOUNTS. THE CHANGES WILL BE REFLECTED IN THE 12/2020 VERSION. THE RULES AND REGULATIONS FOR DEPOSIT ACCOUNTS AND THE UPDATED FUNDS
AVAILABILITY POLICY CAN BE VIEWED OR OBTAINED ONLINE AT
WWW.SUNTRUST.COM/DISCLOSURES, BY REQUESTING A COPY AT 800.SUNTRUST,
OR BY VISITING A SUNTRUST BRANCH.

ACCOUNT TYPE	ACC	ACCOUNT SUMMAN	RY STATEMENT PERIO	י מכ	TAXPAYER ID	
ADVANTAGE CHECKING			12/01/2020 - 12/3		177-68-4044	
DESCRIPTION BEGINNING BALANCE DEPOSITS/CREDITS CHECKS WITHDRAWALS/DEBITS ENDING BALANCE	941,0 \$41,0 \$12,8 \$28,1	MOUNT DESCRI 50.08 AVERAC \$.25 AVERAC 93.20 NUMBEI \$.00 ANNUAI 57.13 INTERE		NT PERIOD ARNED E	AMOUNT \$29,949.05 \$29,949.05 31 .01% \$2.03	
ACCOUNT NUMBER	PRO	OVERDRAFT PROTE TECTED BY ENROLLED	CCTION			
FOR MORE INFORMATIO	ON ABOUT SUNTRUST'S	OVERDRAFT SERVI	CES, VISIT WWW.SUNTE	RUST.COM/OV	ERDRAFT.	
DATE AMOU 12/31 DEPOSITS/CREDITS:	UNT DESCRIPTION 25 INTEREST PAID T		HRU 12/31	:	SR BATCH	
		CHECKS				
NUMBER 361	AMOUNT DATE SR PAID 1,800.00 12/08 20 1,093.20 12/22 21	29134199	CHECK NUMBER *419		DATE SR PAID 12/03 20	
CHECKS: 3 * INDICATES BREAK I AND LISTED AS AN EI			HAVE BEEN PROCESSEI	ELECTRONIC	CALLY	
	BAL	ANCE ACTIVITY HI	STORY			
DATE BA		OLLECTED DATE BALANCE	BALANCE		COLLECTED BALANCE	
12/01 41,0			31,050.08 CC		31,050.08	

PAGE 2 OF 2 34/B36/0175/0 /31

12/31/2020

ACCOUNT STATEMENT

		BALANCE ACTI	VITY HISTOR	Y	
DATE	BALANCE	COLLECTED	DATE	BALANCE	COLLECTED
		BALANCE			BALANCE
12/08	29,250.08	29,250.08	12/31	28,157.13	28,157.13
12/22	28.156.88	28.156.88			

For more information, including details related to fees and balances, please sign on to Online Banking.

MEMBER FDIC

PAGE 1 OF 2 34/B36/0175/0

01/29/2021

ACCOUNT STATEMENT

RANDOLPH BRACY OR SHELBY GREEN SENATE ACOUNT 1820 MERRIVALE LOOP OCOEE FL 34761-5215 QUESTIONS? PLEASE CALL 1-800-786-8787

KEEP YOUR SUNTRUST ACCOUNTS SAFER. USE UNIQUE USERNAMES AND PASSWORDS FOR YOUR ONLINE BANK ACCOUNTS. IT'S BEST NOT TO RECYCLE THE SAME USERNAME AND PASSWORD ON MULTIPLE WEBSITES WHERE YOU HAVE AN ONLINE PROFILE - ESPECIALLY YOUR FINANCIAL ACCOUNTS. ALSO, TRY TO AVOID CHARACTERS FROM YOUR EMAIL, PHONE NUMBER, BIRTHDATE

OR OTHER PERSONAL INFORMATION. ACCOUNT SUMMARY ACCOUNT TYPE ACCOUNT NUMBER STATEMENT PERIOD TAXPAYER ID ADVANTAGE CHECKING 01/01/2021 - 01/29/2021 177-68-4044 AMOUNT DESCRIPTION AMOUNT
\$28,157.13 AVERAGE BALANCE \$26,471.55
\$.21 AVERAGE COLLECTED BALANCE \$26,471.55
\$9,000.00 NUMBER OF DAYS IN STATEMENT PERIOD 29
\$287.54 ANNUAL PERCENTAGE YIELD EARNED .01%
\$18,869.80 INTEREST PAID YEAR TO DATE \$.21 DESCRIPTION BEGINNING BALANCE DEPOSITS/CREDITS CHECKS WITHDRAWALS/DEBITS ENDING BALANCE OVERDRAFT PROTECTION ACCOUNT NUMBER PROTECTED BY NOT ENROLLED FOR MORE INFORMATION ABOUT SUNTRUST'S OVERDRAFT SERVICES, VISIT WWW.SUNTRUST.COM/OVERDRAFT.

DEPOSITS/CREDITS

AMOUNT DESCRIPTION
.21 INTEREST PAID THIS STATEMENT THRU 01/29 DATE SR BATCH

01/29

DEPOSITS/CREDITS: 1 TOTAL ITEMS DEPOSITED: 0

CHECKS AMOUNT DATE SR BATCH CHECK PAID

342 9,000.00 01/25 20 75043234

CHECKS: 1

WITHDRAWALS/DEBITS AMOUNT DESCRIPTION DATE SR BATCH PAID

143.78 CHECK CARD PURCHASE TR DATE 01/07
AVIS.COM PREPAY 8003527900 VA

143.76 CHECK CARD PURCHASE TR DATE 01/22
AVIS.COM PREPAY 8003527900 VA 01/08 8.3 01/25

WITHDRAWALS/DEBITS: 2

MEMBER FDIC

CONTINUED ON NEXT PAGE

PAGE 2 OF 2 34/B36/0175/0 /31 1 01/29/2021

ACCOUNT STATEMENT

DATE	BALANCE	COLLECTED	DATE	BALANCE	COLLECTED
		BALANCE			BALANCE
01/01	28,157.13	28,157.13	01/25	18,869.59	18,869.59
01/08	28,013.35	28,013.35	01/29	18,869.80	18,869.80

For more information, including details related to fees and balances, please sign on to Online Banking.

MEMBER FDIC

PAGE 1 OF 2 34/B36/0175/0 /31

02/26/2021

ACCOUNT STATEMENT

RANDOLPH BRACY OR SHELBY GREEN SENATE ACOUNT 1820 MERRIVALE LOOP OCOEE FL 34761-5215 QUESTIONS? PLEASE CALL 1-800-786-8787

KEEP YOUR SUNTRUST ACCOUNTS SAFER.

USE UNIQUE USERNAMES AND PASSWORDS FOR YOUR ONLINE BANK ACCOUNTS.

IT'S BEST NOT TO RECYCLE THE SAME USERNAME AND PASSWORD ON MULTIPLE WEBSITES WHERE YOU HAVE AN ONLINE PROFILE - ESPECIALLY YOUR FINANCIAL ACCOUNTS.

ALSO, TRY TO AVOID CHARACTERS FROM YOUR EMAIL, PHONE NUMBER, BIRTHDATE OR OTHER PERSONAL INFORMATION.

ACCOUNT SUMMARY ACCOUNT NUMBER STATEMENT PERIOD TAXPAYER ID ACCOUNT TYPE ADVANTAGE CHECKING 01/30/2021 - 02/26/2021 177-68-4044 ***CLOSED*** AMOUNT AMOUNT DESCRIPTION DESCRIPTION BEGINNING BALANCE \$18,869.80 AVERAGE BALANCE \$2,755.39 DEPOSITS/CREDITS \$22.58 AVERAGE COLLECTED BALANCE \$2,755.39 \$18,892.38 NUMBER OF DAYS IN STATEMENT PERIOD ANNUAL PERCENTAGE YIELD EARNED 28 CHECKS WITHDRAWALS/DEBITS \$.00 ENDING BALANCE \$.00 INTEREST PAID YEAR TO DATE OVERDRAFT PROTECTION PROTECTED BY ACCOUNT NUMBER NOT ENROLLED FOR MORE INFORMATION ABOUT SUNTRUST'S OVERDRAFT SERVICES, VISIT WWW.SUNTRUST.COM/OVERDRAFT. DEPOSITS/CREDITS DATE AMOUNT DESCRIPTION SR BATCH 20 00030179714 TOTAL ITEMS DEPOSITED: 1 DEPOSITS/CREDITS: 1 CHECKS AMOUNT DATE SR BATCH CHECK CHECK AMOUNT DATE SR BATCH NUMBER PAID NUMBER PAID 9,000.00 02/01 21 75072354 9,892.38 02/05 20 75063376 343 344 CHECKS: 2 OVERDRAFT & RETURNED ITEM FEES SUMMARY TOTAL FOR THIS PERIOD TOTAL FOR YEAR-TO-DATE TOTAL OVERDRAFT FEES \$0.00 TOTAL RETURNED ITEM FEES \$0.00 \$0.00 TOTAL OVERDRAFT AND RETURNED ITEM FEE WAIVERS \$36.00 \$36.00

MEMBER FDIC

CONTINUED ON NEXT PAGE

PAGE 2 OF 2 34/B36/0175/0 /31

02/26/2021

ACCOUNT STATEMENT

BALANCE ACTIVITY HISTORY

DATE	BALANCE	COLLECTED BALANCE	DATE	BALANCE	COLLECTED BALANCE
01/30	18,869.80	18,869.80	02/08	.00	.00
02/01	9,869.80	9,869.80	02/26	.00	.00
02/05	-22.58	-22.58			

For more information, including details related to fees and balances, please sign on to Online Banking.

MEMBER FDIC

COPY REFERENCE: 20210409000092 CX 04/13/21 14:23:29 30 WEB JOBT10413141708 0076027678 20201102 07 5000.00 000000

	[www.pinetec.co.tr.co.tec.co.tr.co.t			-·*
	RANDOLPH BRACY		63-215/631	417
	SENATE ACCOUNT		10/30/2021	2
com/checks	PAYTO Gendra Jet	terson	\$5	,000 -
nerine delone	Fixe thous and-		noi.	Security Common Production of Back
	SUNTRUST ACH RT 061000104	7	S. Lloh	
	MEMO Consulting	;	100 G11	<u></u>
				EOFICIENTHEE
	•			

The state of the s	Fairwinds 263181368 10/30/2020 16:12:30 CSYFRETT TMID 53703042058347	CHECK HERE AFTER HOSHE OR REHOTE BEYOSH BYTE DO NOT WRITE START OR SIGH SUIGHT THIS CHE SELERY A START OF SIGH SUIGHT THIS CHE DO NOT WRITE START OR SIGH SUIGHT THIS CHE
	ļ	• • • • • • • • • • • • • • • • • • • •

COPY REFERENCE: 20210409000092 CX 04/13/21 14:23:29 31 WEB JOBT10413141708 0074125606 20201116 07 140.00 000000

RANDOLPH BE SENATE ACCO	RACY UNT		63-215/631 11/1/2020	418
PAYTO She order of	z'/cn_	McWhite	DATE \$ /	10
One hu	indred	tecty	DOLLA	Society Features Included. Details on Back.
SunTrust MEMO	ACH RT 061000	104	ash B	MP MP
s nym e mays i		- ,	. 6	, FOREVER FREE
	y	1E 1	· · · · · · · · · · · · · · · · · · ·	
Security F MicroPrint Chemically Security S	**		DO NOT	£ 0,
The security to not listed, exc Security Features: MicroPrint Linc Chemically Sensitive Properties Security Screen		330	EACHONNE TO THE	CHECK HERE A
The security features listed not listed, exceed industry, not listed, exceed industry. Security Features: Rebults of MicroPtat Line as Justes. Chemically Sensitive Paper (States For Ottobial of Chemically Sensitive Paper). Absence verblage		3.30	DO NOT WRITE, STAMP OR SI RESERVED FOR FINANCIAL II	CHECK HERE AFTER MOBIL
stad, exceed industries: Resultes:			DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE RESERVED FOR FINANCIAL INSTITUTION USE *	CHECK HERE AFTER MOBILE OR REMOTE DEPOSIT

COPY REFERENCE: 20210409000092 CX 04/13/21 14:23:29 32 WEB JOBT10413141708 0075074634 20201116 07 624.00 000000

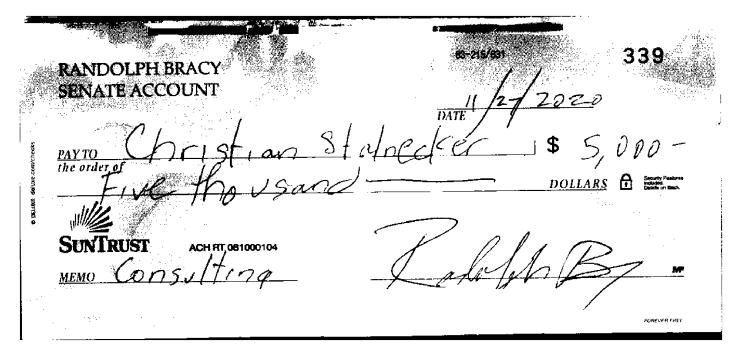
	RANDOLPH BRACY	63-215/631	336
Omychecks	SENATE ACCOUNT PAYTO Holmes Enterto	11/1/2020 DATI \$	- 624 <i></i> -
O ESTINE OBJANE COMM	SunTrust ACHHT 081000104	D 1/1/F	LARS 🗈 🚞
	MEMO Media Services	fadifety ()	POMOVERENCE

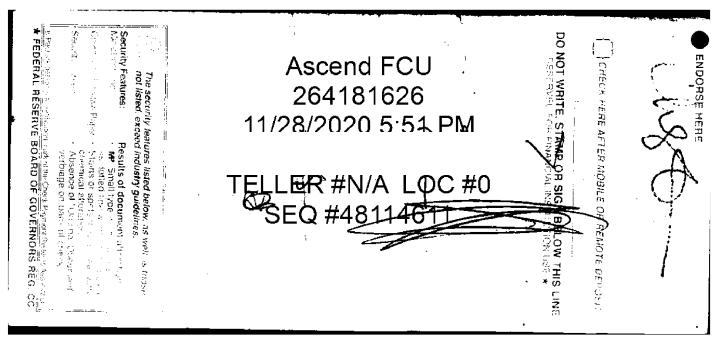
The county to the out of the trace of the energy to the out of the trace of the energy to the out of the energy to the out of the energy to the out of the	Fairwinds 263181368 11/13/2020 17:26:02 CDEMOTT TMID 53863182062757	CHECK HERE AFTER MODILE ON REMOTE DEPORT DIVIS DIVIS DIVIS DIVIDITATION OF STORY BUILDING THIS LINE DIVIDITAT	Boun All
--	---	--	----------

COPY REFERENCE: 20210409000092 CX 04/13/21 14:23:29 33 WEB JOBT10413141708 0076134863 20201123 07 1250.00 000000

		The state of the s	······································	200 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	2.50	
		RANDOLPH BRACY	!	63-215/631		337
		SENATE ACCOUNT				
		i Sarra da Cara da Car		DATE / 20/ Z020		
	5 2	PAYTO Holmes Entertain the order of thousand two hu	2000		1.250	A. —
	e com/ch	the order of	1 1	(4)	1	4×25×4×4×4×4
	o DELUXE, deluxe com/chec)	Une thousand Two hu	ndred	F, TY DOL	LARS 🗗	Security Features Included Details on Bedia
	9 DE U			\mathcal{D}^{\perp}		
		SUNTRUST ACH PT 061000104	1	1/1/4		
		MEMO Congulting		anoppo)	MP
		,	•	"	_/	
						FOREVER FREE
i	i					· `
	3.				{ }	
				7	СНЕ	
	ř			* . : .	CHECK HERE	ENDORSE HERE
	101			·	ERE A) I
	1 10 10			 		√ ™
	100			ž i Žily	#ACB	\mathcal{L}
] r 6(•	100 mm	ILE O	
	BUF AD EMBULLAND IS HOD				138 B	}~
	£				310,	1
	ت با			* 2	ER MUSICE OR RELIOUSE DEPOSIT	
	Ê				<u>ئ</u> 1	
1				•		•

COPY REFERENCE: 20210409000092 CX 04/13/21 14:23:29 34 WEB JOBT10413141708 0075156117 20201130 07 5000.00 000000



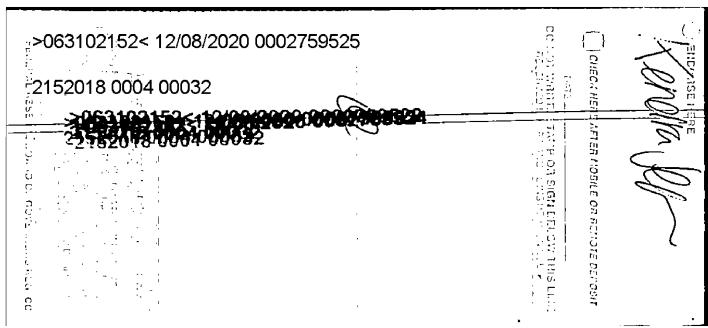


COPY REFERENCE: 20210409000092 CX 04/13/21 14:23:29 35 WEB JOBT10413141708 0074004510 20201203 07 10000.00 000000

RANDOLPH BRASENATE ACCOUNTY PAYTO The order of the order	Creative-Wo	63-215/631 11/3/2 DATE DATE	\$ 10, a	_ ,
FOR THE PROPERTY OF BOTH THE PROPERTY OF THE P	Fairwinds 2 12/2/2020 14:51:50 CSMITH TMID 5383	· :	CHECK HERE AFTER HOBILE OR REMOTE DEPOSIT DO NOT WHATEL STREET OR SIGN DELOTE THE LINE DO NOT WHATEL STREET OR SIGN DELOTE THE LINE PER ENCED FOR A LITERATURE OF THE	Handly Altern.

COPY REFERENCE: 20210409000092 CX 04/13/21 14:23:29 36 WEB JOBT10413141708 0029134199 20201208 07 1800.00 000000

RANDOLPH BRAC	y Sylva	3 3 3 -215/631	361
SENATE ACCOUN	T	$\frac{12}{DATE}$	२० २ ०
C TO	ra Jeff and eight ATT 081000104	hundred Ladolg	DOLLARS A STATE OF THE PARTY OF



STSC SUBPOENA SERVICES FL-ORLANDO-7136 , COPY REFERENCE: 20210409000092 CX 04/13/21 14:23:29 37 WEB JOBT10413141708 0077080387 20201222 07 1093.20 000000

63-215/631 386 RANDOLPH BRACY SENATE ACCOUNT e SELLYE deluxe com/checks **SUNTRUST** ACH RT 061000104) ENDORSE HERE CHECK HERE AFTER MOBILE OR REMOTE DEPOSIT DUNAU OF GOVERNORS ADD. OD.

COPY REFERENCE: 20210409000092 CX 04/12/21 10:46:17 38 WEB JOBD10412104104 0075043234 20210125 06 9000.00 000000

RANDOLPH BRACY
SENATE ACCOUNT

PAYTO From the Heart Char, table Found \$ 9,000—
The order of Mine thougand

DOLLARS TO SHOULTH STATE

SUNTRUST ACHRY 0810000104

MEMO

DOCUMENTS

395918013974 171037 20210122 000 TRN_DEBIT MELIANT 9000.00 Kirkman Road 0959 94004 3959 0006 0121

Exhibit 7 Page 19 of 23

COPY REFERENCE: 20210409000092 CX 04/12/21 10:46:17 39 WEB JOBD10412104104 0075072354 20210201 06 9000.00 000000

63-215/631 343 **RANDOLPH BRACY SENATE ACCOUNT** DOLLARS A SEE RUST ACH PC 061000101 & FEDERAL RESERVE BOAND OF COVER CHECH HERE AFTER ENDORSE HERE POSIT ONLY Substitute of document attenuion 0 MOBILE OR REMOTE SENDSH 5

COPY REFERENCE: 20210409000092 CX 04/12/21 10:46:17 40 WEB JOBD10412104104 0075063376 20210205 06 9892.38 000000

• District Devices and District	RANDOLPH BRACY SENATE ACCOUNT PAYTO A Tota Cov the order of Local Cov the order of Local Cov SUNTRUST ACH HT 081000104 MEMO CONSULTING	nsulting pht bundre	63-215/631 DATE / 20/2 Group & (0) \$ 2d ninety-two?	344 9,892.38- 60LLARS A ME
	The completions of the control of th			C ENDORSE HERE TO NOT WHITE, STATE OR SIGN BELOW THIS LINE OO NOT WHITE, STATE OR SIGN BELOW THIS LINE SESSION ALL TO THE STATE OF RETORD DEPOSIT OF THE OWNER OF THE OR SIGN BELOW THIS LINE OF THE OWNER OWNE

COPY REFERENCE: 20210409000093 CX 04/13/21 14:23:29 40 WEB JOBT10413141708 0028065672+ 20201030 07

1000.00 000000

SunTrust Bank

Deposit

Transaction Date / Time: 10/30/2020/14:19 Processing Date: 10/30/2020

Cashbox Number: 0007 Cost Center: 6097800

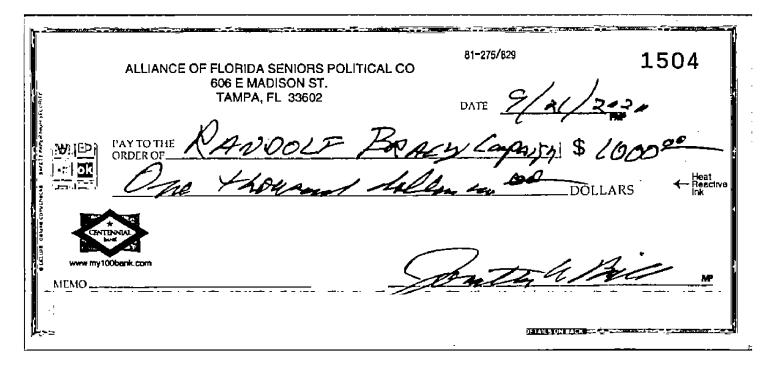
Transaction ID: 144 Account Number: Account Type: Checking/Savings/Money Market

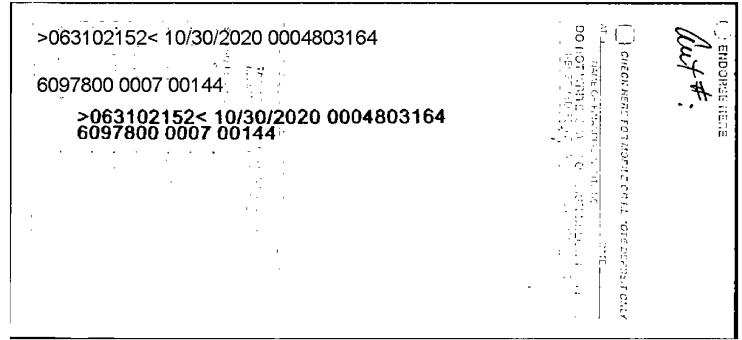
Session Funds In: \$0.00 Cash In: \$0.00 Check In: \$1,000.00 Session Funds Out: \$0.00 Total Deposit Amt: \$1,000.00

>063102152< 10/30/2020 004803165

6097800 0007 00144

COPY REFERENCE: 20210409000093 CX 04/13/21 14:23:29 40 WEB JOBT10413141708 0028065672+ 20201030 07 1000.00 000000







Green FEC Cases StatementS Green to: fec 10/05/2022 06:51 AM

Cc: "Stephanie Cunningham"
From: "S Green" <sbsllc2017@gmail.com>

To: fec@myfloridalegal.com Cc: "Stephanie Cunningham" <Stephanie.Cunningham@myfloridalegal.com>

History:

This message has been replied to and forwarded.

1 Attachment



FECCases StatementSigned.pdf

Hi,

Please see my statement attached.

Thank you. Shelby Green October 5 2022

Florida Ethics Commission Po Drawer 15709 Tallahassee, FL 32317

Subject: FEC Cases Statement

Dear Stephanie Cunningham,

Please allow this statement to serve as a formal explanation of the circumstances that have contributed to the multiple FEC cases that I would like to settle. I would first like to acknowledge that I have submitted reports late and subsequently amended reports with large amounts of activity. While this was never my initial intention, factors such as: lack of thorough Chapter 106 Statute knowledge, lack of consistent and continued help with reports, the unawareness of financial activity until the last minute, the unawareness of a high volume of activity until the last minute, and the lack of the preparation for the quickened reporting dates all contribute to my errors.

For the past two election cycles, I have worked as an independent contractor in the role of the Treasurer on many campaigns and political committees. I began this process by learning the EFS system and gathering information from candidates and committees to file reports. While I had some knowledge of the election statutes, not only was I not well-versed at the time, but I would only reference the statutes as needed. Therefore, I subverted my own treasury and compliance efforts in not knowing and always implementing statutes like the 2-day recordkeeping requirement of expenses and being prepared for the quickening of the reporting periods. During my first election cycle as a Treasurer, I did not initially have help in preparing the reports but learned that in order to file the weekly and bi-weekly reports on time and with accuracy, I would need assistance, so I was able to get help during my second cycle, but it was not constant and eventually tapered off when I needed it the most. Ultimately, the person that was assisting me was no longer available to me during the pre-election weekly reporting and in preparing the termination reports-when I needed the most assistance.

Two of the largest factors that led to my late reporting and subsequent amendments were not readily knowing the reporting period dates and not always having knowledge of the activity that had occurred-which in retrospect was probably my largest mistake. In any one instance where I would receive a large batch of check images, at the last minute, from the campaign that had been written to canvassers or campaign staff and not yet cashed or even contributions that were received but not yet deposited by reporting time, it would prevent me from preparing other reports and in turn make my other reports late. Yes, I learned quickly that operating blindly was not sustainable and definitely did not allow for accuracy or timeliness and did not agree with Chapter 106.

While I have explained the compounding reasons that have led to my multiple cases with the FEC, and have learned that these lessons come at a high price, I greatly appreciate your consideration in the resolution and settlement of these cases.

Shelby Green

FLORIDA ELECTIONS COMMISSION PHONE LOG

Case No.: FEC 21-246

Respondent: Shelby Green

Complainant: Division of Elections

1. **Date and time:** 07/13/21 @ 10:47 a.m.

Name: Respondent **Phone** #: 850-590-3612

Summary: See note at the end of the Phone Log.

Entered by: MBW

2. **Date and time:** 07/20/21 @ 10:32 a.m.

Name: Respondent **Phone** #: 850-590-3612

Summary: I called Respondent to clarify information she had given in the previous

telephone interview.

Respondent previously stated that if she had any questions about completing the CTRs she would check the Treasurer Handbook. I asked if she possessed a copy of the Handbook. She stated she did not have a printed copy of the Handbook; she explained that she would check the online copy at the DOE website.

Entered by: MBW

3. **Date and time:** 11/28/22 @ 3:58 p.m.

Name: Respondent **Phone** #: 850-590-3612

Summary: I called to get an update on the information I received during the initial interview on July 13, 2021. I asked her to explain her understanding of reporting campaign activities before the investigation and what is her understanding now. She stated that it was her understanding that if she did not file the report by the due date then she would be assessed a fine. However, she thought that it was okay to file an amended report to add information as long as the original report was filed on time. She stated that she did not realize that there was anything wrong with amending the campaign reports until she started getting the letters about the investigation.

I asked her to explain why there was a large amount of activity reported after the due date. She explained that she wanted to be transparent, so she reported the information that was available and added the rest later. I asked her to explain. She stated that the candidate or PCs usually collected the contributions and wrote the expenditure checks and sent her the information to file the reports. She stated that sometimes she did not have access to bank records, especially for the candidates from south Florida because she lives in Tallahassee so the candidates would have a campaign worker to compile a spreadsheet and send her the spreadsheet. She stated that there were occasions when the spreadsheets did not contain all the information required on the campaign report; therefore, she just reported the information that was available to her.

I asked her had any information regarding her political history changed, i.e., had she run for office, had she read the Handbook or Chapter 106. She stated that she had not run for public office. She stated that she had never run for public office. She explained that the Shelby Green that ran for City Commission was not her. She stated that since the last interview she has read Chapter 106, Florida Statutes. She added, "it's a lot of stuff in there." She stated she has also read the Handbook. She stated that she has the 2018 Handbook. I gave her directions to download the 2022 Handbook from the DOE website.

She stated that she has made other corrective measures to try to stay on top of things. She has hired an assistant to help her input the information. She requests that the candidates and PCs use Truist as their depository so she can monitor the account activity electronically. She requires access to the campaign account so she can have access to the information before the day before it is due.

Memo to File? No Entered by: MBW

4. **Date and time:**

Name:

Phone #:

Summary:

Entered by:

5. **Date and time:**

Name:

Phone #:

Summary:

Entered by:

6. **Date and time:**

Name:

Phone #:

Summary:

Entered by:

7. **Date and time:**

Name:

Phone #:

Summary:

Entered by:

8. **Date and time:**

Name:

Phone #:

Summary:

Entered by:

9. **Date and time:**

Name: Phone #: Summary: Entered by:

RESPONDENT INTERVIEW MEMO – Call details for entry #1

- I asked why did she filed so many amendments? She stated that often the candidates would not send her the information until the day before the report was due. She stated that initially she had several people working with her to enter the information into the system but later, the volunteers dropped out and it just left her to do everything. She stated that she became overwhelmed by amount of activity that occurred in each campaign. She stated that she prioritized filing the report on time.
- I asked if she was aware that all the information regarding the financial activity in a reporting period should be on the original report. She answered affirmatively and added that it was her understanding that if the report was late the campaign would be assessed a fine, but it was okay to amend the report if the report was timely filed. She stated that she inputted as much information as possible before filing the original report and she would file an amended to report the information that was not recorded on the original. She reiterated that she was overwhelmed.
- I asked if she had access to the bank accounts for the campaigns. She answered negatively. She stated that in many cases she was not a signatory on the account. She explained that usually the candidate handled the deposits and expenditures and sent the information to her to be reported. She stated that sometimes that would send it periodically and sometimes they would wait until the end of the reporting period, when it was time to file the report.
- I asked, if she considered resigning from some of the candidates' campaigns, since she felt "overwhelmed." She stated that she thought about it but she didn't want to just leave the candidates in a bad situation with no one to help with the campaign. I asked if she thought she was currently in a bad situation. She answered affirmatively. I asked if she had discussed her situation with any of the candidates. She answered, negatively. She stated she did know what the procedure was or what she needed to do; therefore, she has not spoken with anyone about her current situation.
- I asked what corrective measures she took once she received the letters from the FEC. She stated that by the time she received the letters most of the campaigns were raping up; therefore, she thought she could handle it but it was just as hectic during the TR period;

therefore, she ended up in the same situation, which generated even more letters from the FEC.

- Have you ever run for public office? If so, please name each office you ran for and state what year each election occurred. *No*
- Have you ever been appointed to act as a campaign treasurer for a candidate? If so, please name each such candidate, the office each ran for, and state what year each election occurred. She stated that she has been appoint as treasurer before. She did not give the candidates' names. She stated that she previously worked with the Democratic party and agreed to help with the campaigns of a couple of the Democratic candidates.
- Have you ever held the office of chairperson, treasurer, or other similar position for a political committee or electioneering communications organization? If so, please name each committee, state the office you held for each, and state when you held each office. *Yes. Treasurer*.
- Have you ever prepared or signed a campaign treasurer's report? If so, please state the
 name of the candidate or committee whose report you prepared or signed. Yes. Various
 Democratic candidates.
- What action have you taken to determine your responsibilities under Florida's election laws? She stated that she checked the treasurer handbook and called the DOE if she had any questions.
- Do you possess a copy of Chapter 106, Florida Statutes? If so, when did you first obtain it? Have you read it? No
- Do you possess a copy of the [Candidate and Campaign Treasurer OR Political Committee OR Electioneering Communications Organization] Handbook? If so, when did you first obtain it? Have you read it? Yes. She did not know the exact date she first obtained it. She stated she did not read the entire handbook but referred to it if she had any questions.
- Did you receive any other materials from your filing officer? If so, please describe them.
 No
- Do you have anything else to add for the Commission's consideration regarding the charges specified in the letter of legal sufficiency in this case? She stated that she was hoping she could settle all the cases. I informed her that I would inform the attorney assigned to the case and the attorney will get back with her. I explained that FEC 19-439 may not be included in the settlement agreements that Ms. Clay will discuss with her. I explained the settlement process and the investigative process. I informed her that I will attempt to meet with Ms. Clay regarding her cases next week and someone would reach out to her by phone. I confirmed that 850-590-3612 was the number to reach her.

FLORIDA ELECTIONS COMMISSION PHONE LOG

Case No.: FEC 21-246

Respondent: Shelby Green

Complainant: Division of Elections

1. **Date and time:** 07/13/21 @ 10:47 a.m.

Name: Respondent **Phone** #: 850-590-3612

Summary: See note at the end of the Phone Log.

Entered by: MBW

2. **Date and time:** 07/20/21 @ 10:32 a.m.

Name: Respondent **Phone** #: 850-590-3612

Summary: I called Respondent to clarify information she had given in the previous

telephone interview.

Respondent previously stated that if she had any questions about completing the CTRs she would check the Treasurer Handbook. I asked if she possessed a copy of the Handbook. She stated she did not have a printed copy of the Handbook; she explained that she would check the online copy at the DOE website.

Entered by: MBW

3. **Date and time:** 11/28/22 @ 3:58 p.m.

Name: Respondent **Phone** #: 850-590-3612

Summary: I called to get an update on the information I received during the initial interview on July 13, 2021. I asked her to explain her understanding of reporting campaign activities before the investigation and what is her understanding now. She stated that it was her understanding that if she did not file the report by the due date then she would be assessed a fine. However, she thought that it was okay to file an amended report to add information as long as the original report was filed on time. She stated that she did not realize that there was anything wrong with amending the campaign reports until she started getting the letters about the investigation.

I asked her to explain why there was a large amount of activity reported after the due date. She explained that she wanted to be transparent, so she reported the information that was available and added the rest later. I asked her to explain. She stated that the candidate or PCs usually collected the contributions and wrote the expenditure checks and sent her the information to file the reports. She stated that sometimes she did not have access to bank records, especially for the candidates from south Florida because she lives in Tallahassee so the candidates would have a campaign worker to compile a spreadsheet and send her the spreadsheet. She stated that there were occasions when the spreadsheets did not contain all the information required on the campaign report; therefore, she just reported the information that was available to her.

I asked her had any information regarding her political history changed, i.e., had she run for office, had she read the Handbook or Chapter 106. She stated that she had not run for public office. She stated that she had never run for public office. She explained that the Shelby Green that ran for City Commission was not her. She stated that since the last interview she has read Chapter 106, Florida Statutes. She added, "it's a lot of stuff in there." She stated she has also read the Handbook. She stated that she has the 2018 Handbook. I gave her directions to download the 2022 Handbook from the DOE website.

She stated that she has made other corrective measures to try to stay on top of things. She has hired an assistant to help her input the information. She requests that the candidates and PCs use Truist as their depository so she can monitor the account activity electronically. She requires access to the campaign account so she can have access to the information before the day before it is due.

Memo to File? No Entered by: MBW

4. **Date and time:**

Name:

Phone #:

Summary:

Entered by:

5. **Date and time:**

Name:

Phone #:

Summary:

Entered by:

6. **Date and time:**

Name:

Phone #:

Summary:

Entered by:

7. **Date and time:**

Name:

Phone #:

Summary:

Entered by:

8. **Date and time:**

Name:

Phone #:

Summary:

Entered by:

9. **Date and time:**

Name: Phone #: Summary: Entered by:

<u>RESPONDENT INTERVIEW MEMO – Call details for entry #1</u>

- I asked why did she filed so many amendments? She stated that often the candidates would not send her the information until the day before the report was due. She stated that initially she had several people working with her to enter the information into the system but later, the volunteers dropped out and it just left her to do everything. She stated that she became overwhelmed by amount of activity that occurred in each campaign. She stated that she prioritized filing the report on time.
- I asked if she was aware that all the information regarding the financial activity in a reporting period should be on the original report. She answered affirmatively and added that it was her understanding that if the report was late the campaign would be assessed a fine, but it was okay to amend the report if the report was timely filed. She stated that she inputted as much information as possible before filing the original report and she would file an amended to report the information that was not recorded on the original. She reiterated that she was overwhelmed.
- I asked if she had access to the bank accounts for the campaigns. She answered negatively. She stated that in many cases she was not a signatory on the account. She explained that usually the candidate handled the deposits and expenditures and sent the information to her to be reported. She stated that sometimes that would send it periodically and sometimes they would wait until the end of the reporting period, when it was time to file the report.
- I asked, if she considered resigning from some of the candidates' campaigns, since she felt "overwhelmed." She stated that she thought about it but she didn't want to just leave the candidates in a bad situation with no one to help with the campaign. I asked if she thought she was currently in a bad situation. She answered affirmatively. I asked if she had discussed her situation with any of the candidates. She answered, negatively. She stated she did know what the procedure was or what she needed to do; therefore, she has not spoken with anyone about her current situation.
- I asked what corrective measures she took once she received the letters from the FEC. She stated that by the time she received the letters most of the campaigns were raping up; therefore, she thought she could handle it but it was just as hectic during the TR period;

therefore, she ended up in the same situation, which generated even more letters from the FEC.

- Have you ever run for public office? If so, please name each office you ran for and state what year each election occurred. No
- Have you ever been appointed to act as a campaign treasurer for a candidate? If so, please name each such candidate, the office each ran for, and state what year each election occurred. She stated that she has been appoint as treasurer before. She did not give the candidates' names. She stated that she previously worked with the Democratic party and agreed to help with the campaigns of a couple of the Democratic candidates.
- Have you ever held the office of chairperson, treasurer, or other similar position for a
 political committee or electioneering communications organization? If so, please name
 each committee, state the office you held for each, and state when you held each office.
 Yes. Treasurer.
- Have you ever prepared or signed a campaign treasurer's report? If so, please state the name of the candidate or committee whose report you prepared or signed. Yes. Various Democratic candidates.
- What action have you taken to determine your responsibilities under Florida's election laws? She stated that she checked the treasurer handbook and called the DOE if she had any questions.
- Do you possess a copy of Chapter 106, Florida Statutes? If so, when did you first obtain it? Have you read it? *No*
- OR Electioneering Communications Organization] Handbook? If so, when did you first obtain it? Have you read it? Yes. She did not know the exact date she first obtained it. She stated she did not read the entire handbook but referred to it if she had any questions.
- Did you receive any other materials from your filing officer? If so, please describe them. *No*
- Do you have anything else to add for the Commission's consideration regarding the charges specified in the letter of legal sufficiency in this case? *She stated that she was hoping she could settle all the cases.* I informed her that I would inform the attorney assigned to the case and the attorney will get back with her. I explained that FEC 19-439 may not be included in the settlement agreements that Ms. Clay will discuss with her. I explained the settlement process and the investigative process. I informed her that I will attempt to meet with Ms. Clay regarding her cases next week and someone would reach out to her by phone. I confirmed that 850-590-3612 was the number to reach her.



Green FEC Cases StatementS Green to: fec 10/05/2022 06:51 AM

Cc: "Stephanie Cunningham"

From: "S Green" <sbsllc2017@gmail.com>

To: fec@myfloridalegal.com

Cc: "Stephanie Cunningham" < Stephanie.Cunningham@myfloridalegal.com>

History:

This message has been replied to and forwarded.

1 Attachment



FECCases StatementSigned.pdf

Hi,

Please see my statement attached.

Thank you. Shelby Green October 5 2022

Florida Ethics Commission Po Drawer 15709 Tallahassee, FL 32317

Subject: FEC Cases Statement

Dear Stephanie Cunningham,

Please allow this statement to serve as a formal explanation of the circumstances that have contributed to the multiple FEC cases that I would like to settle. I would first like to acknowledge that I have submitted reports late and subsequently amended reports with large amounts of activity. While this was never my initial intention, factors such as: lack of thorough Chapter 106 Statute knowledge, lack of consistent and continued help with reports, the unawareness of financial activity until the last minute, the unawareness of a high volume of activity until the last minute, and the lack of the preparation for the quickened reporting dates all contribute to my errors.

For the past two election cycles, I have worked as an independent contractor in the role of the Treasurer on many campaigns and political committees. I began this process by learning the EFS system and gathering information from candidates and committees to file reports. While I had some knowledge of the election statutes, not only was I not well-versed at the time, but I would only reference the statutes as needed. Therefore, I subverted my own treasury and compliance efforts in not knowing and always implementing statutes like the 2-day recordkeeping requirement of expenses and being prepared for the quickening of the reporting periods. During my first election cycle as a Treasurer, I did not initially have help in preparing the reports but learned that in order to file the weekly and bi-weekly reports on time and with accuracy, I would need assistance, so I was able to get help during my second cycle, but it was not constant and eventually tapered off when I needed it the most. Ultimately, the person that was assisting me was no longer available to me during the pre-election weekly reporting and in preparing the termination reports-when I needed the most assistance.

Two of the largest factors that led to my late reporting and subsequent amendments were not readily knowing the reporting period dates and not always having knowledge of the activity that had occurred-which in retrospect was probably my largest mistake. In any one instance where I would receive a large batch of check images, at the last minute, from the campaign that had been written to canvassers or campaign staff and not yet cashed or even contributions that were received but not yet deposited by reporting time, it would prevent me from preparing other reports and in turn make my other reports late. Yes, I learned quickly that operating blindly was not sustainable and definitely did not allow for accuracy or timeliness and did not agree with Chapter 106.

While I have explained the compounding reasons that have led to my multiple cases with the FEC, and have learned that these lessons come at a high price, I greatly appreciate your consideration in the resolution and settlement of these cases.

Shelby Green



Florida Elections Commission

107 West Gaines Street, Suite 224 Tallahassee, Florida 32399-6596 Telephone: (850) 922-4539 Facsimile: (850) 921-0783 FEC@myfloridalegal.com www.fec.state.fl.us



December 13, 2021

Shelby Green, Treasurer Campaign of Randolph Bracy 1842 Ashley Hall Way Tallahassee, FL 32308-4976

RE: Case No.: FEC 21-246; Respondent: Shelby Green

Dear Ms. Green:

On March 15, 2021, the Florida Elections Commission received a complaint alleging that you violated Florida's election laws. I have reviewed the complaint and find that it contains one or more **legally sufficient allegations**. The Commission staff will investigate the following alleged violations:

Section 106.07(5), Florida Statutes: Respondent, in her capacity as treasurer for Randolph Bracy, a 2020 candidate for State Senator, District 11, may have certified the campaign's 2021 TR report was true, correct, and complete when it was not, as alleged in the complaint.

Section 106.19(1)(c), Florida Statutes: Respondent, in her capacity as treasurer for Randolph Bracy, a 2020 candidate for State Senator, District 11, may have falsely reported or deliberately failed to include information in the campaign's 2021 TR report required by Chapter 106, Florida Statutes, as alleged in the complaint.

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

Pursuant to Section 106.25(4)(i)3., Florida Statutes, the Commission may enter into a consent agreement with a Respondent to settle a complaint prior to a finding of probable cause. If you are interested in entering negotiations directed towards reaching a consent agreement to resolve this matter, please contact the Commission and request to speak with the attorney assigned to this case.

Shelby Green December 13, 2021 Page 2 FEC 21-246

Please note that all documents related to this matter will be mailed to the above address unless you notify us of a new address.

Pursuant to Section 106.25, Florida Statutes, complaints, investigations, investigative reports, and other documents relating to an alleged violation of Chapters 104 or 106, Florida Statutes, are <u>confidential</u> until the Commission finds probable cause or no probable cause, unless the Respondent files a written waiver of confidentiality with the Commission. The confidentiality provision does not apply to the Complainant or the Respondent.

Should 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.

For additional information, please refer to the "Frequently Asked Questions" section of the Commission's website.

If you have additional questions, please contact **Margie Wade**, the investigator assigned to this case, by phone at (850) 922-4539 or by email at Margie. Wade@myfloridalegal.com.

Sincerely,

Tim Vaccaro
Executive Director

TV/mw

DIVISION OF ELECTIONS FEC NOTICE FORM

To FEC from Division of Elections

Candidate:

Randolph Bracy

Account Number:

69607

Treasurer:

Shelby Green

The Division of Elections hereby provides this notice to the Florida Elections Commission pursuant to sections 106.22(7) and 106.25, Florida Statutes. Apparent violations of Chapter 106, F.S., have occurred based upon a review of campaign treasurer's reports which reflect that the report listed below was filed in violation of sections 106.07(5) and 106.19(1)(c), Florida Statutes. In addition, the treasurer failed to keep detailed accounts, current within not more than 2 days after the date of receiving a contribution or making an expenditure made by or on behalf of the candidate in violation of section 106.06(1), Florida Statutes.

2021 TR

- Randolph Bracy (69607) was a 2020 candidate for the office of State Senator.
- On November 14, 2017, Senator Bracy filed the Appointment of Campaign Treasurer and Designation of Campaign Depository with the Division appointing Shelby Green as treasurer.
- The 2021 TR campaign treasurer's report was due on February 1, 2021. On February 2, 2021, Ms. Green filed the report showing expenditures in the amount of \$9,000. On February 22, 2021, Ms. Green amended the report adding \$45,330.16 in expenditures.

Sent By:

Kristi Reid Willis

Date:

March 11, 2021

eal

FLORIDA DEPARTMENT OF STATE, DIVISION OF ELECTIONS CAMPAIGN TREASURER'S REPORT SUMMARY							
(1) Randolph Bracy	(2) 696	607					
Candidate, Committe or Party Name		Number					
(3) 1820 Merrivale Loop	Ocoee	FL	34761				
Address (number and street) Check box if address has changed since last report	City	State	Zip Code				
(4) Check appropriate box(es):							
X Candidate (office sought): ☐ Political Committee ☐ Committee of Continuous Existance ☐ Party Executive Committee	Check If PC has						
(5) REP	ORT IDENTIFIERS						
Cover Period: From 10/30/2020 To	02/01/2021	Report Type:	TR				
☐ Original	Special Election Report						
(6) CONTRIBUTIONS THIS REPORT	(7) E	XPENDITURES T	HIS REPORT				
Cash & Checks \$1.18	Monetary Expenditu	res	\$54,330.16				
Loans \$0.00	Transfers to Office A	ccount	\$0.00				
Total Monetary \$1.18	Total Monetary	/	\$54,330.16				
In-Kind \$0.00	(8) Other Distribution	ns					
It is a first degree misdemeanor for an	Certification y person to falsify a public re	ecord (ss.839.13,	F.S.)				
I certify that I have examined this report and it is true, correct and complete	I certify that I have e true, correct and cor		ort and it is				
Name of Treasurer Deputy Treasurer	Name of X Ca	indidate	Chaiman (PC/PTY Only				
X							
Signature	Signature	<u> </u>					

Prepared on: 3/11/21 9:28:10AM Reviewed On: 2/22/21 5:11 pm

ID: 69607

CAMPAIGN TREASURER'S REPORT – ITEMIZED EXPENDITURES

наде 1 от 1

Name: Randolph Bracy

Report: 2021 TR

Period: 10/30/2020 to 02/01/2021

** Records in Filed Report **

	Full Name	ecorus III rii	T T T T T T T T T T T T T T T T T T T		Amount
Seq # Date	(Last, Suffix, First, Middle Street Address & City, State, Zip	Туре	Purpose	Amend	,
01/31/2021	EDUMATICS KNOWLEDGE SHOP 7649 W COLONIAL DR ORLANDO, FL 32818	MON	EDUCATION RESEARCH/CONSULTING	UPD	\$9,000.00
* 1	SB SOLIUTIONS CONSULTING			- 1015	\$100.00
44/04/0000		X			
11/01/2020	, DUMORY ENTITIES			Histor	y 02/02/21
10/30/2020	DJ IVORY ENT LLC 12575 NW 27TH AVE APT # 203 MIAMI, FL 33167	MON	EVENT ENTERTAINMENT	ADD	\$300.00
3	JEFFERSON KENDRA	MON	GRAPHIC DESIGN		\$5,000.0
10/30/2020	5987 LEE VISTA BLVD ORLANDO, FL 32822	INOIN	OTAL THE BESIGN	ADD	
4	BREAKFAST CLUB OF OCOEE			-	\$27.40
4440440000	267 WEST RD, OCOEE, FL 34761	MON	FOOD & BEVERAGES		4- 7
11/04/2020	OCOEE, FL 34761			ADD	0457.0
5	4RIVERS SMOKEHOUSE 1047 S DILLARD ST.	MON	FOOD & BEVERAGES	ļ	\$157.3°
11/05/2020	WINTER GARDEN, FL 34787			ADD	
6	HOLMES ENTERTAINMENT	MON	VIDEOGRAPHY		\$1,317.9
11/01/2020	1437 CAPE COVE BLVD ORLANDO, FL 32808	IVICIN	\ VIBESSION	ADD	
7	MCWHITE SHARON	_		1:22	\$140.0
	8350 SANDBERRY BLVD	MON	SPONSORSHIP		Ψ1-10.0
11/01/2020	ORLANDO, FL 32819			ADD	
8	PUBLIX 7524 DR. PHILLIPS BLVD	MON	EVENT SUPPLIES		\$208.1
11/18/2020	ORLANDO, FL 32819			UPD	
8	PUBLIX	MON	EVENT SUPPLIES		\$206.9
11/18/2020	7524 DR. PHILLIPS BLVD ORLANDO, FL 32819	IVICIN	LVENT GOTT EIEG	ADD H	istory 02/22/21
9	HOLMES ENTERTAINMENT				\$1,250.0
	1437 CAPE COVE BLVD	MON	VIDEOGRAPHY		Ψ1,200.0
11/20/2020	ORLANDO, FL 32808			ADD	
10	STALNECKER CHRISTIAN 11 S WESTERN AVE	MON	MARKETING CONSULTING		\$5,000.0
11/27/2020	NASHVILLE, TN 37210			ADD	
11	KM CREATIVE WORKS LLC	MON	SOCIAL MEDIA & MARKETING		\$10,000.0
11/03/2020	5987 LEE VISTA BLVD ORLANDO, FL 32822	IVICIN	GOOIAE MEDIA & MARKETING	ADD	
12	JEFFERSON KENDRA				\$1,800.0
	5987 LEE VISTA BLVD	MON	GRAPHIC DESIGN		Ψ1,000.0
12/01/2020	ORLANDO, FL 32822		 -	ADD	
13	SB SOLUTIONS CONSULTING PO BOX 5651	MON	TREASURY & COMPLIANCE		\$1,093.2
12/01/2020	TALLAHASSEE, FL 32314			ADD	
14	AVIS	MON	TRAVEL		\$143.7
01/25/2021	3400 E SKY HARBOR BLVD, PHOENIX, AZ, 85034 PHOENIX, AZ 85034	IVICIN	1100022	ADD	
15	FROM THE HEART CHARITABLE FUND				\$9,000.0
	1200 PREMIER DR STE 260	DIS	DISPOSITION OF FUNDS TO CHARITABLE		ψυ,υυυ.υ
12/01/2020	CHATTANOOGA, TN 37421		ORGANIZATION	ADD	40.55==
16	A TOTAL CONSULTING GROUP 211 MAIN ST	MON	MARKETING CONSULTING		\$9,892.3
11/20/2020	WINDERMERE, FL 34786	1	1	ADD	