

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Amy Rose

Case No.: FEC 21-382

TO: Amy Rose
3116 Coral Ridge Drive
Coral Springs, FL 33065

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

NOTICE OF HEARING (INFORMAL HEARING (IH))

A hearing will be held in this case before the Florida Elections Commission on **February 7, 2024 at 9:00 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.

Tim Vaccaro

Executive Director
Florida Elections Commission
January 19, 2024

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.

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

**Florida Elections Commission,
Petitioner,**

Case No.: FEC 21-382

v.

**Amy Rose,
Respondent.**

_____ /

ORDER OF PROBABLE CAUSE

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

On July 5, 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 violations:

Count 1:

On or around April 12, 2021, Amy Rose violated Section 106.19(1)(c), Florida Statutes, when she deliberately failed to include information required by Chapter 106, Florida Statutes, on the ECO’s 2021 M3 Report.

THIS SPACE INTENTIONALLY LEFT BLANK

2023 NOV 15 10 58 AM EST

Count 2:

On or around May 10, 2021, Amy Rose violated Section 106.0703(6), Florida Statutes, when she failed to timely file a written report with the filing officer that no reportable contributions or expenditures were made during the ECO's 2021 M4 reporting period.

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



Tim Vaccaro, J.D., Executive Director
For Chad Mizelle, Chairman
Florida Elections Commission

Copies furnished to:
Mattie T. Clay, Assistant General Counsel
Amy Rose, Respondent
Division of Elections, Complainant

NOTICE OF RIGHT TO A HEARING

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

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

Third, you may request a formal hearing held before an administrative law judge in the Division of Administrative Hearings ("DOAH"), if you dispute any material fact in the Staff Recommendation. You have thirty (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 thirty (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 West 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: Amy Rose

Case No.: FEC 21-382

TO: Amy Rose
3116 Coral Ridge Drive
Coral Springs, FL 33065-3065

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

NOTICE OF HEARING (PROBABLE CAUSE DETERMINATION (PCD))

A hearing will be held in this case before the Florida Elections Commission on, **November 15, 2023 at 9:00 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.

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.

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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.



Florida Elections Commission

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

Telephone: (850) 922-4539 · Facsimile: (850) 921-0783

FEC@myfloridalegal.com · www.fec.state.fl.us



September 6, 2023

Amy Rose
3116 Coral Ridge Drive
Coral Springs, FL 33065

RE: Case No.: FEC 21-382; Respondent: Amy Rose

Dear Ms. Rose:

The Florida Elections Commission at its August 15, 2023, virtual meeting was unable to hear this case. Therefore, this case has been rescheduled for its next meeting, which is scheduled for November 14-15, 2023, in Tallahassee. A notice of hearing indicating the exact date and time will be mailed approximately 14 days before the hearing.

If you have any questions, please contact us at the number listed above or at fec@myfloridalegal.com.

Sincerely,

Tim Vaccaro

Executive Director

TV/dm

cc: Division of Elections, Complainant

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Amy Rose

Case No.: FEC 21-382

TO: Amy Rose
3116 Coral Ridge Drive
Coral Springs, FL 33065

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

NOTICE OF HEARING (PROBABLE CAUSE DETERMINATION)

A hearing will be held in this case before the Florida Elections Commission on, **August 15, 2023 at 2:00 p.m.**, or as soon thereafter as the parties can be heard, at the following location: **Virtual Meeting.**

Register in advance for this meeting via Zoom link:

<https://us06web.zoom.us/meeting/register/tZYudumrjgoGNJ2UhnWkz6Q8JF6AOXxKwdP>

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

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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.

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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.

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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: Amy Rose

Case No.: FEC 21-382

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 106.0703(6), and 106.19(1)(c), Florida Statutes**. Based upon a thorough review of the Report of Investigation submitted on December 8, 2021, the following facts and law support this staff recommendation:

1. On July 2, 2021, the Florida Elections Commission (“Commission”) received a referral from the Department of State, Division of Elections (“Division”), alleging that Amy Rose (“Respondent”) violated Chapter 106, Florida Statutes.

2. Respondent is the treasurer for Accountability in Government, an electioneering communications organization (“ECO”) registered with the Division. On January 29, 2020, the ECO’s Statement of Organization form was filed, which identified Respondent as the ECO’s chairperson and treasurer. (ROI Exhibit 1, pages 1-2)¹

3. By letter dated September 22, 2021, the Executive Director notified Respondent that Commission staff would investigate the following statutory provisions:

Section 106.0703(6), Florida Statutes: As alleged in the complaint, Respondent, treasurer for Accountability in Government, an electioneering communications organization registered with the Division of Elections, failed to file a written report with the filing officer by the prescribed reporting date that no reportable contributions or expenditures were made during the 2021 M3 and 2021 M4 reporting periods.

Section 106.19(1)(c), Florida Statutes: As alleged in the complaint, Respondent, treasurer for Accountability in Government, an electioneering communications organization registered with the Division of Elections, may have falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, during the 2021 M3 and 2021 M4 reporting periods.

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

4. By letter dated January 30, 2020, Kristi Reid Willis, Chief, Bureau of Election Records, sent Respondent a letter acknowledging that the Division had received the ECO's Statement of Organization form. (ROI Exhibit 2, page 1)

5. The acknowledgment letter advised Respondent that all ECOs filing reports with the Division are required to use the electronic filing system ("EFS") and provided Respondent with a user identification number and initial password to grant access to the EFS. (ROI Exhibit 2, page 1) The letter further advised Respondent that all 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, page 2)

6. The ECO's 2021 M3 Report was due on April 12, 2021, and the ECO's 2021 M4 Report was due on May 10, 2021. (ROI Exhibit 3, pages 1 & 3; ROI Exhibit 6, page 1) However, Respondent failed to timely file the reports. *See* Compl. By letters dated April 13, 2021, May 11, 2021, June 1, 2021, and June 11, 2021, the Division notified Respondent that the ECO's reports had not been received. The letters also notified Respondent that she was still required to file the reports if the ECO had no reportable financial activity. (ROI Exhibit 3, pages 1 & 3) The final notification letters were confirmed delivered on June 4, 2021, and June 16, 2021. (ROI Exhibit 4, page 2; ROI Exhibit 5, page 2)

7. A subpoena was issued to the ECO's designated campaign depository to ascertain whether any financial activity occurred during the relevant reporting periods, i.e., March 1, 2021, through March 31, 2021, and April 1, 2021, through April 30, 2021. (ROI Exhibit 4, page 1; ROI Exhibit 5, page 1) Bank records show one expenditure totaling \$12,475.00 during the 2021 M3 reporting period and no activity during the 2021 M4 reporting period. (ROI Exhibit 7, pages 2-3; ROI Exhibit 8, page 1)

8. On October 12, 2021, Respondent filed written reports reflecting no contributions or expenditures for both reporting periods, which were 183 days late and 155 days late, respectively. (ROI Exhibit 6, page 1)

9. Respondent acknowledged that she filed late notices of no activity for both reporting periods. Respondent affirmed that she possessed and read Chapter 106, Florida Statutes, and the *Electioneering Communications Organization Handbook*. Respondent is the chairperson and treasurer for one political committee and a second ECO. (ROI Exhibit 9, page 2)

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

11. The facts set forth above show that Respondent is the treasurer for Accountability in Government, an ECO registered with the Division. Respondent failed to timely file the ECO's

2021 M3 and 2021 M4 Reports. As it appears that the ECO had financial activity during the 2021 M3 reporting period, Respondent failed to include information in the ECO's 2021 M3 Report in violation of Section 106.19(1)(c), Florida Statutes. Thus, Respondent was not required to file a written report that no reportable contributions or expenditures were made for the relevant reporting period. However, as it appears that the ECO had no financial activity during the 2021 M4 reporting period, Respondent was required to file a written report that no reportable contributions or expenditure were made by May 10, 2021, but failed to do so. Thus, it does not appear that Respondent falsely reported or deliberately failed to include information in the 2021 M4 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 around April 12, 2021, Amy Rose violated Section 106.19(1)(c), Florida Statutes, when she deliberately failed to include information required by Chapter 106, Florida Statutes, on the ECO's 2021 M3 Report.

Count 2:

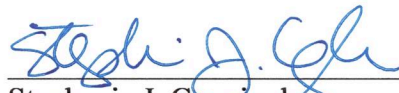
On or around May 10, 2021, Amy Rose violated Section 106.0703(6), Florida Statutes, when she failed to timely file a written report with the filing officer that no reportable contributions or expenditures were made during the ECO's 2021 M4 reporting period.

Respectfully submitted on July 5, 2023.



Mattie T. Clay
Assistant General Counsel

I reviewed this Staff Recommendation this 5th day of July 2023.



Stephanie J. Cunningham
General Counsel

FLORIDA ELECTIONS COMMISSION

Report of Investigation for Sections 106.0703(6) and 106.19(1)(c), F.S.

Case Number: FEC 21-382

Respondent: Amy Rose

Sections 106.0703(6) and 106.19(1)(c), Florida Statutes, failure of the treasurer of an electioneering communications organization that did not receive any contributions or make any expenditures during a reporting period to file a written report with the filing officer by the reporting date that no reportable contributions or expenditures were made or failure to file a campaign report to reflect financial activity.

Division of Elections (Division)

Referral Filed: July 2, 2021

Respondent Type: ECO's Treasurer

I. Preliminary Information:

1. Respondent is the Treasurer for Accountability in Government, an electioneering communications organization (ECO) registered with the Division.

2. A Statement of Organization (DS-DE 103) for the ECO was filed with the Division on January 29, 2020. Respondent was identified as the ECO's treasurer. To review the DS-DE 103, refer to Exhibit 1.

3. On January 30, 2020, the Division sent Respondent a letter to the address provided on the DS-DE 103 acknowledging Respondent's appointment as the campaign treasurer for Accountability in Government and providing Respondent with credentials allowing access to the Electronic Filing System (EFS). 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 *Electioneering Communications Organization 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.


4. The Division sent correspondence to the address provided on the DS-DE 103 notifying Respondent that the following campaign reports had not been filed: 2021 M3 and 2021 M4. The letters included reference to the filing dates for the reports. To review the failure to file correspondence, refer to Exhibit 3.

5. On June 1, 2021, the Division sent Respondent a letter marked "Final Notice" with delivery confirmation to the address provided on the DS-DE 103 notifying Respondent that the following campaign report had not been filed: 2021 M3. The letter was confirmed delivered on June 4, 2021. To review the letter marked "Final Notice" and delivery confirmation, refer to Exhibit 4

6. On June 11, 2021, the Division sent Respondent a letter marked "Final Notice" with delivery confirmation to the address provided on the DS-DE 103 notifying Respondent that the following campaign report had not been filed: 2021 M4. The letter was confirmed delivered on June 16, 2021. To review the letter marked "Final Notice" and delivery confirmation, refer to Exhibit 5.

II. Alleged Violation of Sections 106.0703(6), and 106.19(1)(c), Florida Statutes:

7. I investigated whether Respondent violated these sections of the election laws either by not filing a written report with the filing officer by the reporting date that no reportable contributions or expenditures were made during the following reporting periods or by not filing campaign reports to reflect financial activity for the reporting periods. To review the ECO's filing history, refer to Exhibit 6.

Report	Report Cover Period	Due Date	Report Type Required	Exhibit ¹
2021 M3	03/01/2021 – 03/31/2021	04/12/2021	Report ²	7
2021 M4	04/01/2021 – 04/30/2021	05/10/2021	Written Report of No Reportable Contributions or Expenditures ³	8
8. Respondent did not respond to the referral.				
9. I called Respondent for the purpose of providing an opportunity to discuss the allegations made in the referral. When asked about the failure to timely file the reports at issue, Respondent stated that they were both waivers, and though they were filed late, they have been filed. Respondent acknowledged possessing and having read Chapter 106, Florida Statutes, and the <i>Electioneering Communications Organization Handbook</i> . Respondent stated there was no intent to withhold filing. To review the phone log, refer to Exhibit 9.				
SIGNATURE OF INVESTIGATOR: 			Date: December 8, 2021	

¹ I subpoenaed campaign account records from the designated campaign depository.

² Respondent filed a written report of no reportable contributions or expenditures for the 2021 M3 reporting period on October 12, 2021, which was 183 days late.

³ Respondent filed a written report of no reportable contributions or expenditures for the 2021 M4 reporting period on October 12, 2021, which was 155 days late.

FLORIDA ELECTIONS COMMISSION
REPORT OF INVESTIGATION
Amy Rose -- FEC 21-382

LIST OF EXHIBITS	
Exhibits #s	Description of Exhibits
Exhibit 1	Statement of Organization
Exhibit 2	Acknowledgement Letter
Exhibit 3	Division Correspondence
Exhibit 4	Final Notice – 2021 M3
Exhibit 5	Final Notice – 2021 M4
Exhibit 6	Filing History
Exhibit 7	Bank Records – March 2021
Exhibit 8	Bank Records – April 2021
Exhibit 9	Phone Log

**ELECTIONEERING
COMMUNICATIONS ORGANIZATION**

STATEMENT OF ORGANIZATION

(PLEASE TYPE)

RECEIVED
DEPARTMENT OF
2020 JAN 29 AM 9:45
DIVISION OF ELECTIONS

OFFICE USE ONLY

1. Full Name of Organization Accountability in Government

Telephone 954-593-8826

Mailing Address (include city, state and zip code)

3116 Coral Ridge Drive, Coral Springs, FL 33065

Street Address (include city, state and zip code)

3116 Coral Ridge Drive, Coral Springs, FL 33065

2. Affiliated or Connected Organizations

Name of Affiliated or Connected Organization	Mailing Address	Relationship
None		

3. Area, Scope and Jurisdiction of the Organization

To engage in electioneering communications and other political activities to the extent not prohibited by law for candidates at the municipal, county and state level of office.

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

Full Name	Mailing Address	Street Address	Title or Position
Amy Rose	3116 Coral Ridge Dr Coral Springs, FL 33065	3116 Coral Ridge Dr Coral Springs, FL 33065	Treasurer

5. This Organization was formed (check applicable box): (Calendar quarters end the last day of March, June, September, and December.)

As a newly created organization during the current calendar quarter.

From an organization existing prior to the current calendar quarter.

6. List By Name, Mailing and Street Address, & Position, Other Principal Officers, including the treasurer and deputy treasurer, if any. Include the top-ranking officer's (e.g., chairperson) name and information.

Full Name	Mailing Address	Street Address	Title or Position
Amy Rose	3116 Coral Ridge Dr Coral Springs, FL 33065	3116 Coral Ridge Drive Coral Springs, FL 33065	Chair & Treasurer

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

Residual funds will be donated in part to a 501(c)(3) registered charity and the remainder returned pro rata to contributors.

8. List All Banks, Safety Deposit Boxes, or Other Depositories Used by this Organization for Electioneering Communications

Name of Bank or Depository	Mailing Address
Bank of America	3200 N. University Drive Coral Springs, FL 33065


9. List All Reports Required to be Filed by this Organization with Federal Officials, & the Names, Addresses, & Positions of Such Officials, If Any

Report Title	Dates Required to be Filed	Name & Position of Official	Mailing Address
IRS Form 8871	Upon Formation	IRS	IRS Center Ogden, UT 84201

STATE OF Florida COUNTY Broward

I, Amy Rose, certify that the information in this Statement of

Organization is complete, true, and correct.


Signature of Top-ranking Principal Officer of Organization

1/27/2020
Date



FLORIDA DEPARTMENT *of* STATE

RON DESANTIS
Governor

LAUREL M. LEE
Secretary of State

January 30, 2020

Amy Rose, Chairperson
Accountability in Government
3116 Coral Ridge Drive
Coral Springs, Florida 33065

Dear Ms. Rose:

This will acknowledge receipt of the Statement of Organization for **Accountability in Government**, which was placed on file in our office on January 29, 2020. This information appears to comply with the requirements of Sections 106.011 and 106.03, Florida Statutes. The name of this organization has been placed on our active list as an electioneering communications organization.

Campaign Reports

Your first campaign report will be due on **February 10, 2020**. The report will cover the period of January 1-31, 2020 (2020 M1). All electioneering communications organizations that file reports with the Division of Elections are required to file by means of the Division's Electronic Filing System (EFS).

EFS Access

Below is the web address to access the EFS and the organization's user identification number. Enclosed are the organization's confidential, filing credentials.

EFS Website Address: <https://efs.dos.state.fl.us>
Identification Number: 74932

Timely Filing

All reports must be completed and filed through the EFS no later than midnight, Eastern Standard Time, of the due date. Reports not filed by midnight of the due date are late filed and subject to the penalties in Section 106.0703(7), Florida Statutes. In the event that the EFS is inoperable on

Division of Elections
R.A. Gray Building, Suite 316 • 500 South Bronough Street • Tallahassee, Florida 32399
850.245.6240 • 850.245.6260 (Fax) • [DOS.MyFlorida.com/elections](https://dos.myflorida.com/elections)



Amy Rose, Chairperson
January 30, 2020
Page Two

the due date, the report will be accepted as timely filed if filed no later than midnight, Eastern Standard Time, of the first business day the EFS becomes operable. No fine will be levied during the period the EFS was inoperable.

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

Electronic Receipts

The person submitting the report on the EFS will be issued an electronic receipt indicating and verifying the report was filed. Each campaign report filed by means of the EFS is considered to be under oath by the treasurer and such persons are subject to the provisions of Section 106.0703(4), Florida Statutes.

Instructions and Assistance

An online instruction guide is available to you on the EFS to assist with navigation, data entry, and submission of reports. The Division of Elections will also provide assistance to all users by contacting the EFS Help Desk at (850) 245-6280.

All of the Division's publications and reporting forms are available on the Division of Elections' website at <https://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, *Electioneering Communications Organization Handbook*, *Calendar of Reporting Dates*, and Rule 1S-2.017, Florida Administrative Code.

Please let me know if you need additional information.

Sincerely,



Kristi Reid Willis, Chief
Bureau of Election Records

KRW/zjs

Enclosures



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

April 13, 2021

Amy Rose, Treasurer
Accountability in Government
3116 Coral Ridge Drive
Coral Springs, FL 33065-3065

ECO 74932

Dear Ms. Rose:

Our records indicate that you have not filed your campaign treasurer's report that was due on April 12, 2021. Electioneering communication organizations (ECOs) are required to file a report even when the ECO has not received funds, made any contributions, or expended any reportable funds.

The law (s. 106.0703(7)(a), Fla. Stat.) requires the filing officer to immediately notify you about the missed filing date and the automatic fines that will be assessed for late filing of a report.

If you have not filed a report, statutory fines are automatically assessed as follows until you file your report:

- \$50 for the first 3 days late
- \$500 per day for each day after the 3rd day late
- If the required report immediately precedes a primary and general election, the automatic fine is \$500 for each late day.

The total fine for the untimely report cannot exceed 25% of the total receipts or expenditures, whichever is greater, for the cover period. Even if you end up filing your report late, we cannot waive the statutory fines. We will notify you of the specific amount of fines owed once you file your report. You have 20 days from the day you receive the notice to pay the fine or to appeal the fine to the Florida Elections Commission.

However, in all cases, failure to file and/or untimely filing of a report may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat., apart from the automatic fines set forth above.

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

Sincerely,

Donna S. Brown, Sr. Mgmt. Analyst II
Bureau of Election Records



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

Second Notice

May 11, 2021

Amy Rose, Treasurer
Accountability in Government
3116 Coral Ridge Drive
Coral Springs, FL 33065-3065

ECO 74932

Dear Ms. Rose:

Our records indicate that you have not yet filed the organization's campaign treasurer's report that was due on April 12, 2021.

We mailed, via regular mail, the first notice of the failure to file the above-mentioned report on April 13, 2021.

The first notice which we provided to you specifically explained the automatic fine provisions in the law (s. 106.0703(7)(a), Fla. Stat.) for failure to file a required report. Such fines are continuing to accrue for a late-filed report. Our initial notice further indicated that, in all cases, failure to file and/or untimely filing of a report may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may also subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Donna S. Brown, Chief
Bureau of Election Records



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

May 11, 2021

ECO 74932

Amy Rose, Treasurer
Accountability in Government
3116 Coral Ridge Drive
Coral Springs, FL 33065-3065

Dear Ms. Rose:

Our records indicate that you have not filed your campaign treasurer's report that was due on May 10, 2021. Electioneering communication organizations (ECOs) are required to file a report even when the ECO has not received funds, made any contributions, or expended any reportable funds.

The law (s. 106.0703(7)(a), Fla. Stat.) requires the filing officer to immediately notify you about the missed filing date and the automatic fines that will be assessed for late filing of a report.

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

Sincerely,

Donna S. Brown, Chief
Bureau of Election Records



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

Second Notice

June 1, 2021

Amy Rose, Treasurer
Accountability in Government
3116 Coral Ridge Drive
Coral Springs, FL 33065-3065

ECO 74932

Dear Ms. Rose:

Our records indicate that you have not yet filed the organization's campaign treasurer's report that was due on May 10, 2021.

We mailed, via regular mail, the first notice of the failure to file the above-mentioned report on May 11, 2021.

The first notice which we provided to you specifically explained the automatic fine provisions in the law (s. 106.0703(7)(a), Fla. Stat.) for failure to file a required report. Such fines are continuing to accrue for a late-filed report. Our initial notice further indicated that, in all cases, failure to file and/or untimely filing of a report may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may also subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Donna S. Brown, Chief
Bureau of Election Records



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

Final Notice

Delivery Confirmation:

USPS TRACKING # **9114 9022 0078 9307 2436 09**
& CUSTOMER For Tracking or inquiries go to USPS.com
RECEIPT LABEL (ROLL) or call 1-800-222-1811.

June 1, 2021

Amy Rose, Treasurer
Accountability in Government
3116 Coral Ridge Drive
Coral Springs, FL 33065-3065

ECO 74932

Dear Ms. Rose:

A recent review of the Division's records show that the organization referenced above has not yet filed the required report during the following cover period.

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2021	M3	3/1/21 - 3/31/21

The Division has previously notified the organization of the unfiled report. Please file your report. If the report is not filed within 7 day of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.0703(7)(a), Fla. Stat.

As we stated in the prior notices, even if the organization now files the report, the untimely filing of a report may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Donna S. Brown, Chief
Bureau of Election Records

USPS Tracking®

[FAQs >](#)

[Track Another Package +](#)

Tracking Number: 9114902200789307243609




[Remove X](#)

Your item was delivered in or at the mailbox at 11:23 am on June 4, 2021 in CORAL SPRINGS, FL 33065.

Delivered, In/At Mailbox

June 4, 2021 at 11:23 am
CORAL SPRINGS, FL 33065

Get Updates 

- Text & Email Updates** 
- Tracking History** 
- Product Information** 

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Can't find what you're looking for?

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FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

Final Notice
Delivery Confirmation:

USPS TRACKING # **9114 9022 0078 9307 2438 21**
& CUSTOMER For Tracking or inquiries go to USPS.com
RECEIPT LABEL (ROLL) or call 1-800-222-1811.

June 11, 2021

Amy Rose, Treasurer
Accountability in Government
3116 Coral Ridge Drive
Coral Springs, FL 33065-3065

ECO 74932

Dear Ms. Rose:

A recent review of the Division's records show that the organization referenced above has not yet filed the required report during the following cover period.

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2021	M4	4/1/21 - 4/30/21

The Division has previously notified the organization of the unfiled report. Please file your report. If the report is not filed within 7 day of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.0703(7)(a), Fla. Stat.

As we stated in the prior notices, even if the organization now files the report, the untimely filing of a report may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Donna S. Brown, Chief
Bureau of Election Records



[FAQs >](#)

[Track Another Package +](#)

Tracking Number: 9114902200789307243821




[Remove X](#)

Your item was delivered in or at the mailbox at 1:25 pm on June 16, 2021 in CORAL SPRINGS, FL 33065.

Delivered, In/At Mailbox

June 16, 2021 at 1:25 pm
CORAL SPRINGS, FL 33065

Get Updates 

- [Text & Email Updates](#) 
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- [Product Information](#) 

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Can't find what you're looking for?

Go to our [FAQs](#) section to find answers to your tracking questions.



Florida Department of State - Division of Elections

Florida Election System Reports

Candidate/Committee Lookup

Name:

Electioneering Accountability in Government
Comm Name:
Account: 74932

Election:

Acct:

Type:

Date Due	Type	Date Filed	Status	Days Late	Fine Assessed	Appealed	Amount Fined	Amount Paid
11/6/2022	D9		CLO	0	\$0.00		\$0.00	\$0.00
11/5/2022	D8	11/4/2022						
11/4/2022	D7	11/4/2022						
11/4/2022	G6	11/4/2022						
11/3/2022	D6	11/4/2022	PEN	1	\$0.00		\$0.00	\$0.00
11/2/2022	D5	11/2/2022						
11/1/2022	D4	11/2/2022	PEN	1	\$0.00		\$0.00	\$0.00
10/31/2022	D3	10/31/2022						
10/30/2022	D2	10/30/2022						
10/29/2022	D1	10/28/2022						
10/28/2022	G5	10/28/2022						
10/21/2022	G4A	10/21/2022						
10/14/2022	G4	10/14/2022						
10/7/2022	G3A	10/7/2022						
10/7/2022	G3	10/7/2022						
9/23/2022	G2A	9/22/2022						
9/16/2022	G2	9/16/2022						
9/9/2022	G1A	9/15/2022	CLO	6	\$0.00		\$0.00	\$0.00
9/2/2022	G1	9/2/2022						
8/26/2022	P7A	9/2/2022	PEN	7	\$0.00		\$0.00	\$0.00
8/19/2022	P7	8/19/2022						
8/12/2022	P6	8/11/2022						
8/5/2022	P5	8/5/2022						
7/29/2022	P4	7/29/2022						
7/22/2022	P3	7/18/2022						
7/15/2022	P2A	7/18/2022	CLO	3	\$0.00		\$0.00	\$0.00
7/8/2022	P2	7/8/2022						
7/1/2022	P1A	7/1/2022						
6/24/2022	P1	6/24/2022						
6/10/2022	M5	6/10/2022						
5/10/2022	M4	5/12/2022	PEN	2	\$0.00		\$0.00	\$0.00
4/11/2022	M3	4/11/2022						
3/10/2022	M2	3/10/2022						
2/10/2022	M1	2/10/2022						
1/10/2022	M12	1/10/2022						
12/10/2021	M11	1/10/2022	CLO	31	\$0.00		\$0.00	\$0.00
11/10/2021	M10	11/10/2021						
10/12/2021	M9	10/12/2021						
9/10/2021	M8	10/12/2021	CLO	32	\$0.00		\$0.00	\$0.00
8/10/2021	M7	10/12/2021	CLO	63	\$0.00		\$0.00	\$0.00
7/12/2021	M6	10/12/2021	CLO	92	\$0.00		\$0.00	\$0.00
6/10/2021	M5	10/12/2021	CLO	124	\$0.00		\$0.00	\$0.00
5/10/2021	M4	10/12/2021	CLO	155	\$0.00		\$0.00	\$0.00
4/12/2021	M3	10/12/2021	CLO	183	\$0.00		\$0.00	\$0.00

3/10/2021	M2	3/23/2021	CLO	13	\$0.00	\$0.00	\$0.00
2/10/2021	M1	3/23/2021	CLO	41	\$0.00	\$0.00	\$0.00
1/11/2021	M12	3/23/2021	CLO	71	\$0.00	\$0.00	\$0.00
12/10/2020	M11	3/23/2021	CLO	103	\$0.00	\$0.00	\$0.00
11/10/2020	M10	11/4/2020					
11/2/2020	D9	11/4/2020	CLO	2	\$0.00	\$0.00	\$0.00
11/1/2020	D8	11/4/2020	CLO	3	\$0.00	\$0.00	\$0.00
10/31/2020	D7	11/4/2020	CLO	4	\$0.00	\$0.00	\$0.00
10/30/2020	G6	10/29/2020					
10/29/2020	D6	10/29/2020					
10/28/2020	D5	10/29/2020	CLO	1	\$0.00	\$0.00	\$0.00
10/27/2020	D4	10/29/2020	CLO	2	\$0.00	\$0.00	\$0.00
10/26/2020	D3	10/29/2020	CLO	3	\$0.00	\$0.00	\$0.00
10/25/2020	D2	10/29/2020	CLO	4	\$0.00	\$0.00	\$0.00
10/24/2020	D1	10/23/2020					
10/23/2020	G5	10/23/2020					
10/16/2020	G4A	10/16/2020					
10/9/2020	G4	10/9/2020					
10/2/2020	G3A	10/2/2020					
9/25/2020	G3	9/25/2020					
9/18/2020	G2A	9/19/2020	CLO	1	\$50.00	\$50.00	\$50.00
9/11/2020	G2	9/9/2020					
9/4/2020	G1A	9/9/2020	CLO	5	\$0.00	\$0.00	\$0.00
8/28/2020	G1	8/26/2020					
8/21/2020	P7A	8/14/2020					
8/14/2020	P7	8/14/2020					
8/7/2020	P6	8/7/2020					
7/31/2020	P5	7/31/2020					
7/24/2020	P4	7/24/2020					
7/17/2020	P3	7/17/2020					
7/10/2020	P2A	7/10/2020					
7/3/2020	P2	7/3/2020					
6/26/2020	P1A	7/3/2020	CLO	7	\$0.00	\$0.00	\$0.00
6/19/2020	P1	6/19/2020					
6/10/2020	M5	6/10/2020					
5/11/2020	M4	5/11/2020					
4/10/2020	M3	4/10/2020					
3/10/2020	M2	3/10/2020					
2/10/2020	M1	2/10/2020					



P.O. Box 15284
Wilmington, DE 19850

ACCOUNTABILITY IN GOVERNMENT
3116 CORAL RIDGE DR
CORAL SPRINGS, FL 33065-3311

Business Advantage

Customer service information

☎ 1.888.BUSINESS (1.888.287.4637)

✉ bankofamerica.com

✉ Bank of America, N.A.
P.O. Box 25118
Tampa, FL 33622-5118



Please see the **Important Messages - Please Read** section of your statement for important details that could impact you.

Your Business Advantage Fundamentals™ Banking

for March 1, 2021 to March 31, 2021

Account number:

ACCOUNTABILITY IN GOVERNMENT

Account summary

Beginning balance on March 1, 2021	\$36,012.59
Deposits and other credits	0.00
Withdrawals and other debits	-0.00
Checks	-12,475.00
Service fees	-0.00
Ending balance on March 31, 2021	\$23,537.59

of deposits/credits: 0

of withdrawals/debits: 1

of items-previous cycle¹: 0

of days in cycle: 31

Average ledger balance: \$33,598.07

¹Includes checks paid, deposited items & other debits



Your Digital Tools

BUSINESS ADVANTAGE

Keep your business and personal banking with you, wherever you go

With the Mobile Banking app, you can stay on top of both your small business banking and personal accounts, wherever you are. Download the app today from your app store or visit bankofamerica.com/GoMobile.

Mobile Banking requires that you download the Mobile Banking app and is only available for select mobile devices. Message and data rates may apply.

SSM-10-20-0838.B | 3220188

Checks

Date	Check #	Amount
03/26/21	1104	-12,475.00
Total checks		-\$12,475.00
Total # of checks		1

Service fees

The Monthly Fee on your primary Business Advantage Fundamentals Banking account was waived for the statement period ending 02/26/21. A check mark below indicates the requirement(s) you have met to qualify for the Monthly Fee waiver on the account.

- \$250+ in new net purchases on a linked Business debit card has not been met
- \$5,000+ combined average monthly balance in linked business accounts has been met
- Become a member of Preferred Rewards for Business has not been met

For information on how to open a new product, link an existing service to your account, or about Preferred Rewards for Business please call 1.888.BUSINESS or visit bankofamerica.com/smallbusiness.

Daily ledger balances

Date	Balance (\$)	Date	Balance(\$)
03/01	36,012.59	03/26	23,537.59

BUSINESS ADVANTAGE

Go paperless today!

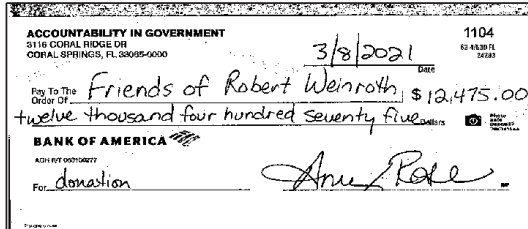
Reduce the risk of lost or stolen mail. Plus, you can view your statements securely and easily — online or from our mobile app — 24/7 from virtually anywhere.¹

You can enroll today by logging in to Online Banking at bankofamerica.com/SmallBusiness and clicking on **Profiles & Settings** (in the upper right, next to Sign Out).

¹Mobile Banking requires that you download the Mobile Banking app and is only available for select mobile devices. Message and data rates may apply. SSM-04-20-0031.B | 3012579

Check images

Account number:
Check number: 110 2,475.00





P.O. Box 15284
Wilmington, DE 19850

ACCOUNTABILITY IN GOVERNMENT
3116 CORAL RIDGE DR
CORAL SPRINGS, FL 33065-3311

Business Advantage

Customer service information

☎ 1.888.BUSINESS (1.888.287.4637)

📧 bankofamerica.com

✉ Bank of America, N.A.
P.O. Box 25118
Tampa, FL 33622-5118

Your Business Advantage Fundamentals™ Banking

for April 1, 2021 to April 30, 2021

Account number:

ACCOUNTABILITY IN GOVERNMENT

Account summary

Beginning balance on April 1, 2021	\$23,537.59
Deposits and other credits	0.00
Withdrawals and other debits	-0.00
Checks	-0.00
Service fees	-0.00
Ending balance on April 30, 2021	\$23,537.59

of deposits/credits: 0

of withdrawals/debits: 0

of items-previous cycle¹: 1

of days in cycle: 30

Average ledger balance: \$23,537.59

¹Includes checks paid, deposited items & other debits

Get rewarded for the business you do

Become a Preferred Rewards for Business member and you can earn valuable benefits and rewards, such as no fees on select banking services, bonus credit card rewards, a partial credit on an eligible monthly payroll service, and more. Plus, there's no fee to join or participate.

SSM-07-20-0027.B | 3137391

To activate or learn more, visit bankofamerica.com/BizRewardsEnroll.

Service fees

The Monthly Fee on your primary Business Advantage Fundamentals Banking account was waived for the statement period ending 03/31/21. A check mark below indicates the requirement(s) you have met to qualify for the Monthly Fee waiver on the account.

- \$250+ in new net purchases on a linked Business debit card has not been met
- \$5,000+ combined average monthly balance in linked business accounts has been met
- Become a member of Preferred Rewards for Business has not been met

For information on how to open a new product, link an existing service to your account, or about Preferred Rewards for Business please call 1.888.BUSINESS or visit bankofamerica.com/smallbusiness.

Daily ledger balances

Date	Balance (\$)
04/01	23,537.59

BANK OF AMERICA BUSINESS ADVANTAGE

Maximize your cash back, plus get a \$300 statement credit*

To apply for the no-annual-fee Business Advantage Cash Rewards credit card, call **888.895.4909** or go to **bankofamerica.com/Biz300** today.

*To qualify for the statement credit, you must open a new small business credit card account and make at least \$3,000 in Net Purchases with your card that post to your account within 90 days from the credit card account opening. Net Purchases exclude any transaction fees, returns and adjustments. The statement credit will be applied to the company's business card account. One \$300 statement credit allowed per company. Please allow 10-12 weeks after the qualifying transaction posts to your account to receive your statement credit. Offer subject to change without notice. 1119SBLStmntCredit.1118 SSM-07-20-0025.B | 3137365

**FLORIDA ELECTIONS COMMISSION
PHONE LOG
Case No.: FEC 21-382**

Respondent: Amy Rose

Complainant: Division of Elections

1. **Date and time:** 11/04/2021; 03:41 p.m.

Name: Amy Rose - Respondent

Phone #: (954) 593-8826

Summary: Spoke with Respondent. Explained case number FEC 21-382. Respondent was cooperative and willing to answer questions about the case, which can be reviewed in the **“RESPONDENT INTERVIEW MEMO”** below.

I informed Respondent when I conclude my investigation, a copy of the Report of Investigation (ROI) will be mailed to her. Based on the results of the investigation, a staff attorney will prepare and present a written Staff Recommendation (SR) to the Commission. She will have an opportunity to respond to both the ROI and the SR.

Entered by: CM

2. **Date and time:**

Name:

Phone #:

Summary:

Entered by:

3. **Date and time:**

Name:

Phone #:

Summary:

Entered by:

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:

RESPONDENT INTERVIEW MEMO – Call details at #1

- Please explain the reason why you failed to notify the filing officer on the prescribed reporting dates that no **2021 M3 or 2021 M4** report would be filed on those dates because the campaign had not received funds, made contributions, or expended reportable funds during the reporting period or failure to file a campaign report to reflect financial activity. “They were both waivers. They were just filed late, but they have been filed.”
- Have you ever run for public office? **Yes**. If so, please name each office you ran for and state what year each election occurred. **State Representative - 2006**
- Have you ever been appointed to act as a campaign treasurer for a candidate? **No**. If so, please name each such candidate, the office each ran for, and state what year each election occurred.
- Have you ever held the office of chairperson, treasurer, or other similar position for a political committee or electioneering communications organization? **Yes**. If so, please name each committee, state the office you held for each, and state when you held each office. **Floridians for Accountability – 2010-2019. Currently: Democracy Forever – Chair/Treasurer, Democracy Forever PC – Chair/Treasurer and this ECO.**
- Have you ever prepared or signed a campaign treasurer’s report? **Yes**. If so, please state the name of the candidate or committee whose report you prepared or signed. **Floridians for Accountability – 2010-2019. Currently: Democracy Forever – Chair/Treasurer, Democracy Forever PC – Chair/Treasurer and this ECO.**
- What action have you taken to determine your responsibilities under Florida’s election laws?
- Do you possess a copy of Chapter 106, Florida Statutes? **Yes**. If so, when did you first obtain it? **2006**. Have you read it? **Yes**.
- Do you possess a copy of *Electioneering Communications Organization Handbook*? **Yes**. If so, when did you first obtain it? **2010**. Have you read it? **Yes**.
- Did you receive any other materials from your filing officer? If so, please describe them.
- 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? “There was no intent to withhold filing. They have already been filed and there is nothing further I can do to rectify this.”



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



September 22, 2021

Amy Rose
3116 Coral Ridge Drive
Coral Springs, FL 33065

RE: Case No.: FEC 21-382; Respondent: Amy Rose

Dear Ms. Rose:

On July 2, 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 106.0703(6), Florida Statutes: As alleged in the complaint, Respondent, treasurer for Accountability in Government, an electioneering communications organization registered with the Division of Elections, failed to file a written report with the filing officer by the prescribed reporting date that no reportable contributions or expenditures were made during the 2021 M3 and 2021 M4 reporting periods.

Section 106.19(1)(c), Florida Statutes: As alleged in the complaint, Respondent, treasurer for Accountability in Government, an electioneering communications organization registered with the Division of Elections, may have falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, during the 2021 M3 and 2021 M4 reporting periods.

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

Amy Rose
September 22, 2021
Page 2
FEC 21-382

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.

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

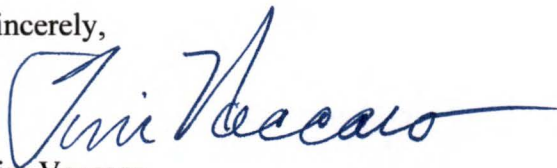
Pursuant to Section 106.25, Florida Statutes, complaints, investigations, investigative reports, and other documents relating to an alleged violation of Chapters 104 or 106, Florida Statutes, are confidential until the Commission finds probable cause or no probable cause, unless the Respondent files 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 **Chuck Mellow**, the investigator assigned to this case, by phone at (850) 922-4539 or by email at Charles.Mellow@myfloridalegal.com.

Sincerely,

A handwritten signature in blue ink that reads "Tim Vaccaro". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Tim Vaccaro
Executive Director

TV/mw

**DIVISION OF ELECTIONS
FEC NOTICE FORM**

To FEC from Division of Elections

Name: Accountability in Government
Account Number: 74932
Chairperson: Amy Rose
Treasurer: Amy Rose
Registered Agent: Amy Rose

The Division of Elections hereby provides this notice to the Florida Elections Commission pursuant to sections 106.0703(7)(d), 106.22(7), and 106.25(2), Florida Statutes. An apparent violation of Chapter 106, Florida Statutes, has occurred based upon the failure to file a report after notice.

The following reports are outstanding after notification:

2021 M3

2021 M4

- Accountability in Government (74932) is an electioneering communications organization registered with the Division of Elections. On January 29, 2020, the organization filed the DSDE 103 and DSDE 41 with the Division indicating that Amy Rose was the chairperson.
- The 2021 M3 campaign treasurer's report was due on April 12, 2021. On April 13, 2021, the Division mailed Accountability in Government notification that the 2021 M3 campaign treasurer's report had not been filed.
- On May 11, 2021, the Division mailed Accountability in Government notification that the 2021 M3 campaign treasurer's report had not been filed.
- On June 1, 2021, the Division mailed Accountability in Government final notification with delivery confirmation that the 2021 M3 report had not been filed. (See attached letter and delivery confirmation.)

- The 2021 M4 campaign treasurer's report was due on May 10, 2021. On May 11, 2021, the Division mailed Accountability in Government notification that the 2021 M4 campaign treasurer's report had not been filed.
- On June 1, 2021, the Division mailed Accountability in Government notification that the 2021 M4 campaign treasurer's report had not been filed.
- On June 11, 2021, the Division mailed Accountability in Government final notification with delivery confirmation that the 2021 M4 report had not been filed. (See attached letter and delivery confirmation.)
- As of July 1, 2021, Accountability in Government has not filed the 2021 M3 and 2021 M4 reports.

Sent By: Donna S. Brown

Date: July 1, 2021

kaf



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

Final Notice
Delivery Confirmation:

USPS TRACKING # **9114 9022 0078 9307 2436 09**
& CUSTOMER For Tracking or Inquiries go to USPS.com
RECEIPT LABEL (ROLL) or call 1-800-222-1811.

June 1, 2021

Amy Rose, Treasurer
Accountability in Government
3116 Coral Ridge Drive
Coral Springs, FL 33065-3065

ECO 74932

Dear Ms. Rose:

A recent review of the Division's records show that the organization referenced above has not yet filed the required report during the following cover period.

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2021	M3	3/1/21 - 3/31/21

The Division has previously notified the organization of the unfiled report. Please file your report. If the report is not filed within 7 day of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.0703(7)(a), Fla. Stat.

As we stated in the prior notices, even if the organization now files the report, the untimely filing of a report may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Donna S. Brown, Chief
Bureau of Election Records

[Track Another Package +](#)

Tracking Number: 9114902200789307243609

[Remove X](#)

Your item was delivered in or at the mailbox at 11:23 am on June 4, 2021 in CORAL SPRINGS, FL 33065.

Delivered, In/At Mailbox

June 4, 2021 at 11:23 am
CORAL SPRINGS, FL 33065

Get Updates 

Text & Email Updates



Tracking History



Product Information



See Less 

Can't find what you're looking for?

Go to our [FAQs](#) section to find answers to your tracking questions.



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

Final Notice

Delivery Confirmation:

USPS TRACKING # **9114 9022 0078 9307 2438 21**
& CUSTOMER For Tracking or inquiries go to USPS.com
RECEIPT LABEL (ROLL) or call 1-800-222-1811.

June 11, 2021

Amy Rose, Treasurer
Accountability in Government
3116 Coral Ridge Drive
Coral Springs, FL 33065-3065

ECO 74932

Dear Ms. Rose:

A recent review of the Division's records show that the organization referenced above has not yet filed the required report during the following cover period.

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2021	M4	4/1/21 - 4/30/21

The Division has previously notified the organization of the unfiled report. Please file your report. If the report is not filed within 7 day of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.0703(7)(a), Fla. Stat.

As we stated in the prior notices, even if the organization now files the report, the untimely filing of a report may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Handwritten signature of Donna S. Brown in black ink.

Donna S. Brown, Chief
Bureau of Election Records

Track Another Package +

Tracking Number: 9114902200789307243821

[Remove X](#)

Your item was delivered in or at the mailbox at 1:25 pm on June 16, 2021 in CORAL SPRINGS, FL 33065.

Delivered, In/At Mailbox

June 16, 2021 at 1:25 pm
CORAL SPRINGS, FL 33065

Get Updates v

Text & Email Updates



Tracking History



Product Information



See Less ^

Can't find what you're looking for?

Go to our [FAQs](#) section to find answers to your tracking questions.