

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Shelby Green

Case No.: FEC 20-630

TO: Shelby Green
Post Office Box 5651
Tallahassee, FL 32314

Division of Elections
500 S. Bronough Street, Room 316
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.

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.

Stephanie Cunningham

From: S Green <sbsllc2017@gmail.com>
Sent: Thursday, August 17, 2023 5:06 PM
To: Stephanie Cunningham
Subject: Re: FEC Cases
Attachments: FinAffiAug 17, 2023 Doc 2.pdf

Please see my financial affidavit attached.

Thank you.

On Thu, Aug 17, 2023 at 10:20 AM S Green <sbsllc2017@gmail.com> wrote:
Thank you. I will get this taken care of today.

On Tue, Aug 15, 2023 at 4:05 PM Stephanie Cunningham <Stephanie.Cunningham@myfloridalegal.com> wrote:

Ms. Green:

Your cases have been continued to the November meeting. I have attached a copy of my prior email regarding the Affidavit of Financial Support for your review.

Congratulations on your little one.

Stephanie J. Cunningham

General Counsel

Florida Elections Commission

107 W. Gaines Street

Collins Building, Suite 224

Tallahassee, FL 32399

stephanie.cunningham@myfloridalegal.com

(850) 922-4539

(850) 921-0783 fax

www.fec.state.fl.us

AFFIDAVIT OF FINANCIAL SUPPORT

1. Shelley Green, Respondent in FEC Case No. Multiple, state:

1. I have 5 dependents. (Do not include children not living at home and do not include a working spouse or yourself.)

2. I have a take home income of \$ 46,951 paid: () weekly () every two weeks () semi-monthly () monthly (yearly 2022)
 (Take home income equals salary, wages, bonuses, commissions, allowances, overtime, tips and similar payments, minus deductions required by law and other court-ordered support payments.)

3. Place of Employment: SB Solutions Consulting

Address: PO Box 5651
Tallahassee, FL 32314

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

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

Social Security benefits?	YES or <input checked="" type="radio"/> NO	\$
Veterans' benefits?	YES or <input checked="" type="radio"/> NO	\$
Unemployment compensation?	YES or <input checked="" type="radio"/> NO	\$
Child support or regular support from family members/spouse?	YES or <input checked="" type="radio"/> NO	\$
Union funds?	YES or <input checked="" type="radio"/> NO	\$
Workers compensation?	YES or <input checked="" type="radio"/> NO	\$
Rental income?	YES or <input checked="" type="radio"/> NO	\$
Retirement/ Pensions?	YES or <input checked="" type="radio"/> NO	\$
Dividends or interest?	YES or <input checked="" type="radio"/> NO	\$
Trusts/ Gifts?	YES or <input checked="" type="radio"/> NO	\$
Any other income not on the list?	YES or <input checked="" type="radio"/> NO	\$

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 or NO	\$
Savings?	YES or <u>NO</u>	\$ 4k
Bank account(s)?	YES or NO	\$ 500
Stocks/ Bonds?	YES or <u>NO</u>	\$
Money market accounts?	<u>YES</u> or NO	\$ 4k
a. Certificates of deposit or Equity* in real estate (excluding homestead) if yes, please list the address of this property below.	<u>YES</u> or NO Trust First Florida W Prime Meridian	\$ 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 <u>NO</u>	\$

ITEDS

*Equity means value minus loans.

a. Address: 4580 Faulkner Ln Tallahassee, FL 32311

b. List the year/make/model & tag#: 2018 Tesla Model S GREEN

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

6. I have total liabilities and debts of \$ 275k as follows:

Home \$	Other Real Property \$
Motor Vehicle \$ <u>50k</u>	Credit Cards \$
Medical bills \$ <u>5k</u>	Costs of medicine \$
Child Support paid direct \$	Other \$ <u>200,000</u>

Student? Personal loans

7. I have a private lawyer in this case..... Yes _____ No

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

STATE OF FLORIDA
COUNTY OF Leon

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

[Signature]
Signature of Respondent

Sworn to and subscribed before me this 17 day of
August, 2023.

[Signature]
Signature of Officer Authorized to Administer Oaths or
Notary public.



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

Personally Known _____ Or Produced Identification X
Type of Identification Produced Driver's License

STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION

In Re: Shelby Green /

Case No.: FEC 20-630

ORDER CONTINUING CASE

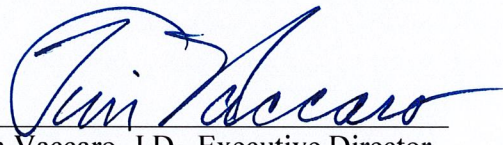
THIS MATTER was heard by the Florida Elections Commission (Commission) at its regularly scheduled meeting on August 15, 2023, in Tallahassee, Florida.

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**

In Re: Shelby Green

Case No.: FEC 20-630

TO: Shelby Green
PO Box 5651
Tallahassee, FL 32314-5651

Division of Elections
500 South Bronough Street, Room 316
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

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See further instructions on the reverse side.

Tim Vaccaro

Executive Director
Florida Elections Commission
August 1, 2023

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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.

FILED ELECTIONS
SECTION
MAY 22 2023
TALLAHASSEE, FLORIDA

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

**Florida Elections Commission,
Petitioner,**

Case No.: FEC 20-630

v.

**Shelby Green,
Respondent.**

_____ /

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 4, 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 September 25, 2020, Shelby Green, violated Section 106.07(5), Florida Statutes, when she certified that People First Leadership Political Committee's 2020 G3 Report was true, correct, and complete when it was not.

THIS SPACE INTENTIONALLY LEFT BLANK

Count 2:

On or around September 25, 2020, Shelby Green, violated Section 106.19(1)(c), Florida Statutes, when she deliberately failed to include information required by Chapter 106, Florida Statutes, on People First Leadership Political Committee's 2020 G3 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 consent order where you and Commission staff agree to resolve the violation(s) and agree to the amount of the fine. The consent order is then presented to the Commission for its approval. To discuss a consent order, contact the FEC attorney identified in the Order of Probable Cause.

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

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

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

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

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

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Shelby Green

Case No.: FEC 20-630

TO: Shelby Green
PO Box 5651
Tallahassee, FL 32314-5651

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, **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/join/register/tZMpduMuqTsqGt1MNuVpQBO15XPapAI_9zfC

Audio Participation:
Dial: 1 301 715 8592

Meeting ID:
874 1067 0009

Passcode:
772737

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
May 2, 2023

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**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Shelby Green

Case No.: FEC 20-630

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 1, 2023, the following facts and law support this staff recommendation:

1. On December 10, 2020, 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 is the treasurer for People First Leadership Political Committee, a political committee registered with the Division. (ROI Exhibit 1)¹

3. By letter dated March 12, 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 People First Leadership Political Committee, a political committee registered with the Division of Elections, may have certified the 2020 G3 campaign treasurer’s 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 People First Leadership Political Committee, a political committee registered with the Division of Elections, may have falsely reported or deliberately failed to include information in the 2020 G3 campaign treasurer’s report required by Chapter 106, Florida Statutes, as alleged in the complaint.

4. On January 14, 2019, People First Leadership Political Committee filed an Appointment of Campaign Treasurer and Designation of Campaign Depository for Political Committees form (“DS-DE 6”) appointing Respondent as its treasurer. (ROI Exhibit 1)

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

5. By letter dated January 15, 2019, Kristi Reid Willis, Chief, Bureau of Election Records, sent Respondent a letter acknowledging that the Division had received the committee's DS-DE 6. (ROI Exhibit 2)

6. The acknowledgment letter advised Respondent that all committees 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. The letter further 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 committee's 2020 G3 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 committee's 2020 G3 Report was due on September 25, 2020. (ROI Exhibit 3) On September 25, 2020, Respondent certified the report as true, correct, and complete. (ROI Exhibit 4, page 2) The committee's report was incomplete as Respondent failed to report expenditures as evidenced by the filing of an amended report. (ROI Exhibits 5-7) (*See* ROI, p. 2, ¶ 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 committee's 2020 G3 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 2020 G3 reporting period which ran from September 12, 2020, through September 18, 2020.

17. The committee's 2020 G3 Report was due on September 25, 2020 and was timely filed. (ROI Exhibit 4, page 2) The report disclosed one monetary contribution in the amount of \$2,000 and one expenditure in the amount of \$102.70. (ROI Exhibit 6, page 1) On October 2, 2020, seven days later, Respondent filed an amended 2020 G3 Report disclosing two expenditures totaling \$30,000. (ROI Exhibits 5 & 6) The report was filed 32 days before the general election.

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 committee's 2020 G3 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 is the treasurer for People First Leadership Political Committee, a political committee registered with the Division. Respondent certified that the committee's 2020 G3 Report was true, correct, and complete when it was not. Respondent deliberately failed to include information required by Chapter 106, Florida Statutes, on the committee's 2020 G3 Report.

Based upon these facts and circumstances, I recommend that the Commission find

probable cause to charge Respondent with violating the following:

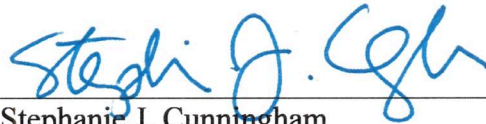
Count 1:

On or about September 25, 2020, Shelby Green, violated Section 106.07(5), Florida Statutes, when she certified that People First Leadership Political Committee's 2020 G3 Report was true, correct, and complete when it was not.

Count 2:

On or around September 25, 2020, Shelby Green, violated Section 106.19(1)(c), Florida Statutes, when she deliberately failed to include information required by Chapter 106, Florida Statutes, on People First Leadership Political Committee's 2020 G3 Report.

Respectfully submitted on April 4, 2023.



Stephanie J. Cunningham
General Counsel

I reviewed this Staff Recommendation this ^{4th} day of April 2023.



Tim Vaccaro
Executive Director

FLORIDA ELECTIONS COMMISSION

Report of Investigation for Late-Reported Financial Activity

Case Number: FEC 20-630

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: December 10, 2020

Respondent Type: Treasurer for Political Committee

I. Preliminary Information:

1. Respondent was the appointed campaign treasurer for People First Leadership Political Committee, a political committee registered with the Division. The Appointment of Campaign Treasurer and Designation of Campaign Depository (DS-DE 6) appointing Respondent was filed on January 14, 2019. To review the DS-DE 6, refer to Exhibit 1.

2. On January 15, 2019, the Division sent Respondent a letter acknowledging Respondent's appointment as the campaign treasurer for People First Leadership Political Committee. 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 *Political Committee 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) on or before the due date(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: 2020 G3. To review the filing history, refer to Exhibit 4.

5. The 2020 G3 was due on September 25, 2020. Respondent filed it on September 25, 2020. By filing the report, Respondent certified that it was true, correct, and complete. The report showed one monetary contribution in the amount of \$2,000.00, no in-kind contributions, and one monetary expenditure in the amount of \$102.70. To review the 2020 G3, refer to Exhibit 5. To review Division records evidencing when the activity referenced in this paragraph was filed on the original report, refer to Exhibit 6, page 1.

6. On October 2, 2020, which was seven days after the due date for the report, Respondent filed an amended 2020 G3 report adding two monetary expenditures in the total amount of \$30,000.00. This amended report was filed 30 days before the general election. To review the 2020 G3, 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. To review the applicable bank records, refer to Exhibit 7.¹

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 *Political Committee 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

¹ 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 1, 2023

FLORIDA ELECTIONS COMMISSION
REPORT OF INVESTIGATION
Shelby Green -- FEC 20-630

LIST OF EXHIBITS	
Exhibits #s	Description of Exhibits
Exhibit 1	DS DE 6
Exhibit 2	Acknowledgement Letter
Exhibit 3	2020 Reporting Dates
Exhibit 4	Filing History
Exhibit 5	2020 G3 Report
Exhibit 6	2020 G3 DPA Report
Exhibit 7	Bank Report
Exhibit 8	Respondent's Written Response
Exhibit 9	Phone Log

HAND DELIVERED

RECEIVED

2019 JAN 14 PM 4:24


STATE OF FLORIDA
TALLAHASSEE

**APPOINTMENT OF CAMPAIGN TREASURER
AND DESIGNATION OF CAMPAIGN
DEPOSITORY FOR
POLITICAL COMMITTEES**
(Sections 106.011(1) and 106.021(1), F.S.)

CHECK APPROPRIATE BOX:

OFFICE USE ONLY

Original Appointment of Treasurer Reappointment of Treasurer Deputy Treasurer

1 Committee or Organization People First Leadership Political Committee		2 Telephone (919) 522-2246	
3 Name of Treasurer or Deputy Treasurer Shelby Green		4. Email (optional)	
		5 Telephone (optional) (850) 661-3941	
6 Mailing Address Post Office Box 5651 Tallahassee, FL 32314			
7 Street Address 2700 Welaunee Blvd Unit 101 Tallahassee, FL 32308			
8 The following bank has been designated as the <input checked="" type="checkbox"/> Primary Depository <input type="checkbox"/> Secondary Depository			
9 Name of Bank Suntrust Bank		10. Street Address 3522 Thomasville Road	
11 City Tallahassee		12. State Florida	13. Zip Code 32309
14. Signature of Chairman 		15. Name of Chairman (Print or Type) Brice Barnes	

Campaign Treasurer's Acceptance of Appointment

I, Shelby Green do hereby accept the appointment as
(Please Print or Type)
treasurer or deputy treasurer for People First Leadership Political Committee
(Committee or Organization)

**UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING CAMPAIGN TREASURER'S
ACCEPTANCE OF APPOINTMENT AND THAT THE FACTS STATED ARE TRUE.**

1/14/19 Date X  Signature of Campaign Treasurer or Deputy Treasurer



FLORIDA DEPARTMENT *of* STATE

RON DESANTIS
Governor

MICHAEL ERTEL
Secretary of State

January 15, 2019

Brice Barnes, Chairperson
People First Leadership Political
Committee
Post Office Box 14852
Tallahassee, Florida 32308

Dear Mr. Barnes:

This will acknowledge receipt of the Statement of Organization and Appointment of Campaign Treasurer and Designation of Campaign Depository for **People First Leadership Political Committee**, which were placed on file in our office on January 14, 2019. This information appears to comply with the requirements of Section 106.03, Florida Statutes, and the name of this organization has been placed on our active committee list as a political committee.

Campaign Treasurer's Reports

Your first campaign treasurer's report will be due on **February 11, 2019**. The report will cover the period of January 1-31, 2019 (2019 M1). All political committees 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 committee's user identification number. The enclosed sealed envelope contains the committee's filing credentials.

EFS Website Address: <https://efs.dos.state.fl.us>
Identification Number: 74041

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

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



Brice Barnes, Chairperson
January 15, 2019
Page Two

the penalties in Section 106.07(8), Florida Statutes. In the event that the EFS is inoperable on the due date, the report will be accepted as timely filed if filed no later than midnight, 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 political committee failing to file a report on the designated due date is subject to a fine of \$50 per day for the first 3 days and, thereafter, \$500 per day for each 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, not to exceed 25% of the total receipts or expenditures, whichever is greater, for the period covered by the late report.

Electronic Receipts

The person submitting the report on the EFS will be issued an electronic receipt indicating and verifying the report was filed. Each campaign treasurer's report filed by means of the EFS is considered to be under oath by the chairperson and campaign treasurer and such persons are subject to the provisions of Section 106.07(5), 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 <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: Chapter 106, Florida Statutes, *Political Committee 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/jcs

Enclosures

pc: Shelby Green, Treasurer

2020 Calendar of Reporting Dates

Political Committees/Independent Expenditure-Only Organizations registered with the Division of Elections

Report Code	Cover Period	Due Date
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
2019 MUC*	1/1/19 – 12/31/19*	6/19/2020*

2020 P1	6/1/20 – 6/12/20	6/19/2020
2020 P1A	6/13/20 – 6/19/20	6/26/2020
2020 P2	6/20/20 – 6/26/20	7/3/2020
2020 P2A	6/27/20 – 7/3/20	7/10/2020
2020 P3	7/4/20 – 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 P7A	8/14/20	8/21/2020

2020 G1	8/15/20 – 8/21/20	8/28/2020
2020 G1A	8/22/20 – 8/28/20	9/4/2020
2020 G2	8/29/20 – 9/4/20	9/11/2020
2020 G2A	9/5/20 – 9/11/20	9/18/2020
2020 G3	9/12/20 – 9/18/20	9/25/2020
2020 G3A	9/19/20 – 9/25/20	10/2/2020
2020 G4	9/26/20 – 10/2/20	10/9/2020
2020 G4A	10/3/20 – 10/9/20	10/16/2020
2020 G5	10/10/20 – 10/16/20	10/23/2020

2020 D1**	10/17/20 – 10/23/20**	10/24/2020**
2020 D2**	10/24/2020**	10/25/2020**
2020 D3**	10/25/2020**	10/26/2020**
2020 D4**	10/26/2020**	10/27/2020**
2020 D5**	10/27/2020**	10/28/2020**
2020 D6**	10/28/2020**	10/29/2020**

2020 G6***	10/17/20 – 10/29/20***	10/30/2020***
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2020 M10	10/30/20 – 10/31/20	11/10/2020
2020 M11	11/1/20 – 11/30/20	12/10/2020
2020 M12	12/1/20 – 12/31/20	1/11/2021

* If not reported as individual contributions when received, a political committee must report contributions that comprise multiple uniform contributions from the same person aggregating no more than \$250 per calendar year, collected by an organization that is the affiliated sponsor of the political committee. The report must list the name, address, and occupation of the person making the contribution; however, the occupation need not be listed if the aggregate contribution from the person is \$100 or less.

** These reports need only contain information on all previously unreported contributions received as of the preceding day; however, expenditures can be reported if desired.

*** If expenditures for 10/17/20 – 10/29/20 have already been reported during the daily reports, do not duplicate expenditures in this report.



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Florida Department of State - Division of Elections

Florida Election System Reports

Candidate/Committee Lookup

Committee Name: People First Leadership Political Committee

Name:

Account: 74041

Election:

Acct:

Type:

Date Due	Type	Date Filed	Status	Days Late	Fine Assessed	Appealed	Amount Fined	Amount Paid
10/7/2022	G3A	10/7/2022						
10/7/2022	G3	10/7/2022						
9/23/2022	G2A	9/23/2022						
9/16/2022	G2	9/16/2022						
9/9/2022	G1A	9/9/2022						
9/2/2022	G1	9/2/2022						
8/26/2022	P7A	8/26/2022						
8/19/2022	P7	8/19/2022						
8/12/2022	P6	8/12/2022						
8/5/2022	P5	8/5/2022						
7/29/2022	P4	7/29/2022						
7/22/2022	P3	7/22/2022						
7/15/2022	P2A	7/15/2022						
7/8/2022	P2	7/3/2022						
7/1/2022	P1A	7/3/2022	CLO	2	\$100.00		\$100.00	\$100.00
6/24/2022	P1	6/24/2022						
6/10/2022	M5	6/10/2022						
5/10/2022	M4	5/10/2022						
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	12/10/2021						
11/10/2021	M10	11/10/2021						
10/12/2021	M9	10/12/2021						
9/10/2021	M8	9/10/2021						
8/10/2021	M7	8/10/2021						
7/12/2021	M6	7/12/2021						
6/10/2021	M5	6/10/2021						
5/10/2021	M4	5/9/2021						
4/12/2021	M3	4/12/2021						
3/10/2021	M2	3/10/2021						
2/10/2021	M1	2/10/2021						
1/11/2021	M12	1/11/2021						
12/10/2020	M11	12/10/2020						
11/10/2020	M10	11/10/2020						
10/30/2020	G6	10/30/2020						
10/29/2020	D6	10/30/2020	CLO	1	\$0.00		\$0.00	\$0.00
10/28/2020	D5	10/28/2020						
10/27/2020	D4	10/27/2020						
10/26/2020	D3	10/26/2020						
10/25/2020	D2	10/25/2020						
10/24/2020	D1	10/24/2020						
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	9/18/2020						
9/11/2020	G2	9/11/2020						
9/4/2020	G1A	9/4/2020						
8/28/2020	G1	8/28/2020						
8/21/2020	P7A	8/21/2020						
8/14/2020	P7	8/15/2020	CLO	1	\$125.00		\$125.00	\$125.00
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	6/26/2020						
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						
1/10/2020	M12	1/10/2020						
12/10/2019	M11	12/10/2019						
11/12/2019	M10	11/12/2019						
10/10/2019	M9	10/9/2019						
9/10/2019	M8	9/10/2019						
8/12/2019	M7	8/11/2019						
7/10/2019	M6	7/10/2019						
6/10/2019	M5	6/10/2019						
5/10/2019	M4	5/10/2019						
4/10/2019	M3	4/10/2019						
3/11/2019	M2	3/11/2019						
2/11/2019	M1	2/11/2019						

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

(1) People First Leadership Political Committee (2) 74041
 Candidate, Committee or Party Name I.D. Number

(3) Post Office Box 14852 Tallahassee FL 32308
 Address (number and street) City State Zip Code

Check box if address has changed since last report

(4) Check appropriate box(es):

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

(5) REPORT IDENTIFIERS

Cover Period From 09/12/2020 To 09/18/2020 Report Type: G3

Original Amendment Special Election Report

(6) CONTRIBUTIONS THIS REPORT

Cash & Checks	\$2,000.00
Loans	\$0.00
<i>Total Monetary</i>	\$2,000.00
In-Kind	\$0.00

(7) EXPENDITURES THIS REPORT

Monetary Expenditures	\$30,102.70
Transfers to Office Account	\$0.00
<i>Total Monetary</i>	\$30,102.70

(8) Other Distributions

Certification

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

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

Name of Treasurer Deputy Treasurer

X
Signature

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

Name of Candidate Chairman (PC/PTY Only)

X
Signature

Name People First Leadership Political Committee

Report: 2020 G3

Period: 09/12/2020 to 09/18/2020

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

Seq # Date	Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip	Contributor	Occupation	Amount
		Type	In-Kind Description	Amend
1 09/14/2020	HEALTH NETWORK ONE INC 2001 S ANDREWS AVE FORT LAUDERDALE, FL 33316	F CHE	POLITICAL COMMITTEE	\$2,000.00

CAMPAIGN TREASURER'S REPORT – ITEMIZED EXPENDITURESName: People First Leadership Political CommitteeReport: 2020 G3Period: 09/12/2020 to 09/18/2020**** Records in Filed Report ****

Seq # Date	Full Name (Last, Suffix, First, Middle Street Address & City, State, Zip	Type	Purpose	Amount Amend
1 09/15/2020	SB SOLUTIONS SB SOLUTIONS SB SOLUTIONS CONSULTING PO BOX 5651 TALLAHASSEE, FL 32314	MON	TREASURY AND COMPLIANCE SERVICES	\$102.70
2 09/12/2020	FLORIDA DEMOCRATIC LEGISLATIVE CAMPAIGN COMMITTEE PO BOX 1701 TALLAHASSEE, FL 32302	MON	CONTRIBUTION	\$15,000.00 ADD
3 09/18/2020	FLORIDA DEMOCRATIC LEGISLATIVE CAMPAIGN COMMITTEE PO BOX 1701 TALLAHASSEE, FL 32302	MON	CONTRIBUTION	\$15,000.00 ADD

Filed Campaign Treasurer's Report

People First Leadership Political Committee
74041 - PAC

Elect ID: 20201103-GEN
Report: 2020 G3 (32)

From: 9/12/2020
To: 9/18/2020

Amd: Y Wvr: N
Cmplt: COM

Filed: **FIL** 9/25/2020 6:31:29 P
Reviewed: **AUD** 10/2/2020 7:10:09 P

Original Report

Submitted: 9/25/2020 6:31:29 P

CONTRIBUTIONS

<i>Seq Date</i>	<i>Name</i>	<i>Address</i>	<i>Contributor Type</i>	<i>Occupation Inkind Description</i>	<i>Errors Amd</i>	<i>Amount</i>
1	HEALTH NETWORK ONE INC	2001 S ANDREWS AVE	F	POLITICAL COMMITTEE	0	\$2,000.00
9/14/2020		FORT LAUDERD FL 33316	CHE			

EXPENDITURES

<i>Seq Date</i>	<i>Name</i>	<i>Address</i>	<i>Type</i>	<i>Office Purpose</i>	<i>Errors Amd</i>	<i>Amount</i>
1	SB SOLUTIONS SB SOLUTIONS SB	PO BOX 5651	MON		0	\$102.70
9/15/2020		TALLAHASSEE FL 32314		TREASURY AND COMPLIANCE SERVICES		

Amended Report

Submitted: 10/2/2020 7:06:54 P

EXPENDITURES

<i>Seq Date</i>	<i>Name</i>	<i>Address</i>	<i>Type</i>	<i>Office Purpose</i>	<i>Errors Amd</i>	<i>Amount</i>
2	FLORIDA DEMOCRATIC LEGISLAT	PO BOX 1701	MON		0	\$15,000.00
9/12/2020		TALLAHASSEE FL 32302		CONTRIBUTION	ADD	

9/29/2022

Filed Campaign Treasurer's Report

Page 2

People First Leadership Political Committee
74041 - PAC

Elect ID: **20201103-GEN**

From: **9/12/2020**

Amd: **Y** Wvr: **N**

Filed: **FIL** 9/25/2020 6:31:29 P

Report: **2020 G3 (32)**

To: **9/18/2020**

Cmplt: **COM**

Reviewed: **AUD** 10/2/2020 7:10:09 P

Amended Report

Submitted: 10/2/2020 7:11:04 P

EXPENDITURES

<i>Seq Date</i>	<i>Name</i>	<i>Address</i>	<i>Type</i>	<i>Office Purpose</i>	<i>Errors Amd</i>	<i>Amount</i>
3	FLORIDA DEMOCRATIC LEGISLAT	PO BOX 1701		MON	0	\$15,000.00
9/18/2020		TALLAHASSEE FL 32302		CONTRIBUTION	ADD	

Exhibit 6 Page 2 of 2

SUNTRUST BANK
 PO BOX 305183
 NASHVILLE TN 37230-5183

PAGE 1 OF 1
 63/B10/0175/0/ 39

09/17/2020



ACCOUNT
 STATEMENT

ALLISON T RICHARD OR
 ELIZABETH B BARNES OR
 SHELBY GREEN PEOPLE FIRST LEADERSHIP
 2800 S ADAMS ST UNIT 5651
 TALLAHASSEE FL 32314-7728

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
 EVERYDAY CHECKING 08/19/2020 - 09/17/2020

DESCRIPTION	AMOUNT	DESCRIPTION	AMOUNT
BEGINNING BALANCE	\$48,850.39	AVERAGE BALANCE	\$50,733.45
DEPOSITS/CREDITS	\$8,000.00	AVERAGE COLLECTED BALANCE	\$50,633.45
CHECKS	\$102.70	NUMBER OF DAYS IN STATEMENT PERIOD	30
WITHDRAWALS/DEBITS	\$120.00		
ENDING BALANCE	\$56,627.69		

 OVERDRAFT PROTECTION
 ACCOUNT NUMBER PROTECTED BY
 NOT ENROLLED

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

 TRANSACTION HISTORY

DATE	CHECK #	TRANSACTION DESCRIPTION DETAILS	DEPOSITS/ CREDITS	WITHDRAWALS/ DEBITS	CURRENT BALANCE
08/19		BEGINNING BALANCE			48,850.39
09/08		DEPOSIT	1,000.00		
09/08		ELECTRONIC/ACH DEBIT NGP VAN ACH 2026869330 2510000525		120.00	49,730.39
09/10		DEPOSIT	5,000.00		54,730.39
09/14		DEPOSIT	2,000.00		56,730.39
09/15	1003	CHECK		102.70	56,627.69
09/17		ENDING BALANCE			56,627.69
CREDIT AND DEBIT TOTALS			8,000.00	222.70	

THE ENDING DAILY BALANCES PROVIDED DO NOT REFLECT PENDING TRANSACTIONS OR HOLDS THAT MAY HAVE BEEN
 OUTSTANDING WHEN YOUR TRANSACTIONS POSTED THAT DAY. IF YOUR AVAILABLE BALANCE WASN'T SUFFICIENT
 WHEN TRANSACTIONS POSTED, FEES MAY HAVE BEEN ASSESSED.
 FOR MORE INFORMATION, INCLUDING DETAILS RELATED TO FEES AND BALANCES, PLEASE SIGN ON TO ONLINE
 BANKING.

 BALANCE ACTIVITY HISTORY

DATE	BALANCE	COLLECTED BALANCE	DATE	BALANCE	COLLECTED BALANCE
08/19	48,850.39	48,850.39	09/10	54,730.39	54,730.39
09/08	49,730.39	48,730.39	09/14	56,730.39	54,730.39
09/09	49,730.39	49,730.39	09/15	56,627.69	56,627.69

MEMBER FDIC

CONTINUED ON NEXT PAGE

SUNTRUST BANK
PO BOX 305183
NASHVILLE TN 37230-5183

PAGE 1 OF 2
63/B10/0175/0/ 39

10/19/2020



ACCOUNT
STATEMENT

ALLISON T RICHARD OR
ELIZABETH B BARNES OR
SHELBY GREEN PEOPLE FIRST LEADERSHIP
2800 S ADAMS ST UNIT 5651
TALLAHASSEE FL 32314-7728

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

ACCOUNT SUMMARY
ACCOUNT TYPE ACCOUNT NUMBER STATEMENT PERIOD
EVERYDAY CHECKING 09/18/2020 - 10/19/2020

DESCRIPTION	AMOUNT	DESCRIPTION	AMOUNT
BEGINNING BALANCE	\$56,627.69	AVERAGE BALANCE	\$28,676.24
DEPOSITS/CREDITS	\$18,500.00	AVERAGE COLLECTED BALANCE	\$28,254.36
CHECKS	\$45,111.25	NUMBER OF DAYS IN STATEMENT PERIOD	32
WITHDRAWALS/DEBITS	\$.00		
ENDING BALANCE	\$30,016.44		

OVERDRAFT PROTECTION
ACCOUNT NUMBER PROTECTED BY
NOT ENROLLED

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

TRANSACTION HISTORY

DATE	CHECK #	TRANSACTION DESCRIPTION DETAILS	DEPOSITS/ CREDITS	WITHDRAWALS/ DEBITS	CURRENT BALANCE
09/18		BEGINNING BALANCE			56,627.69
09/18	1004	CHECK		15,000.00	41,627.69
09/21		DEPOSIT	5,000.00		46,627.69
09/21	*1006	CHECK		15,000.00	31,627.69
09/28		DEPOSIT	3,500.00		35,127.69
10/06	1007	CHECK		15,000.00	20,127.69
10/07	1008	CHECK		111.25	20,016.44
10/19		DEPOSIT	10,000.00		30,016.44
10/19		ENDING BALANCE			30,016.44
CREDIT AND DEBIT TOTALS			18,500.00	45,111.25	

* INDICATES BREAK IN CHECK NUMBER SEQUENCE. CHECK MAY HAVE BEEN PROCESSED ELECTRONICALLY AND LISTED AS AN ELECTRONIC/ACH TRANSACTION.
THE ENDING DAILY BALANCES PROVIDED DO NOT REFLECT PENDING TRANSACTIONS OR HOLDS THAT MAY HAVE BEEN OUTSTANDING WHEN YOUR TRANSACTIONS POSTED THAT DAY. IF YOUR AVAILABLE BALANCE WASN'T SUFFICIENT WHEN TRANSACTIONS POSTED, FEES MAY HAVE BEEN ASSESSED.
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MEMBER FDIC

CONTINUED ON NEXT PAGE

SUNTRUST BANK
PO BOX 305183
NASHVILLE TN 37230-5183

PAGE 2 OF 2
63/B10/0175/0/ 39

10/19/2020



ACCOUNT
STATEMENT

DATE	BALANCE	BALANCE ACTIVITY HISTORY		BALANCE	COLLECTED BALANCE
		COLLECTED BALANCE	DATE		
09/18	41,627.69	41,627.69	10/06	20,127.69	20,127.69
09/21	31,627.69	31,627.69	10/07	20,016.44	20,016.44
09/28	35,127.69	31,627.69	10/19	30,016.44	20,016.44
09/29	35,127.69	35,127.69			

MEMBER FDIC

STSC
SUBPOENA SERVICES
FL-ORLANDO-7136

COPY REFERENCE: 20210528000182 SS
06/01/21 10:20:27 4 WEB JOBT10601101132
0030229143+ 20200914 07
2000.00 : 000000

SunTrust Bank

Deposit

Transaction Date / Time: 09/14/2020/16:36
Processing Date: 09/14/2020
Cashbox Number: 0007
Cost Center: 6097800
Transaction ID: 143

Account Number:
Account Type: _____, Market

Session Funds In: \$0.00
Cash In: \$0.00
Check In: \$2,000.00
Session Funds Out: \$0.00
Total Deposit Amt: \$2,000.00

⑆51000175⑆

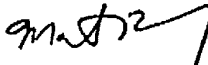
⑆200000⑆


>063102152< 09/14/2020 002402040

6097800 0007 00143

STSC
SUBPOENA SERVICES
FL-ORLANDO-7136

COPY REFERENCE: 20210528000182 SS
06/01/21 10:20:27 4 WEB JOBT10601101132
0030229143+ 20200914 07
2000.00 000000

HEALTH NETWORK ONE, INC. 2001 S. ANDREWS AVE FORT LAUDERDALE, FL 33316		BANK OF AMERICA 63-27/631	50394
Check Number	50394	DATE	Sep 11, 2020
		AMOUNT	\$ 2,000.00
PAY TO THE ORDER OF:	Two Thousand and 00/100 Dollars		
	People First Leadership		
		 AUTHORIZED SIGNATURE	

Security Features Included  Details on Back.

>063102152< 09/14/2020 0002402039
6097800 0007 00143

>063102152< 09/14/2020 0002402039
6097800 0007 00143

For Deposit only
People First Leadership

STSC
SUBPOENA SERVICES
FL-ORLANDO-7136

COPY REFERENCE: 20210528000181 SS
06/01/21 10:20:27 2 WEB JOBT10601101132
0078152725 20200915 07
102.70 000000

ALLISON T RICHARD OR
ELIZABETH B BARNES OR SHELBY GREEN
PEOPLE FIRST LEADERSHIP
6035 BOYNTON HOMESTEAD
TALLAHASSEE, FL 32312

63-215/631

1003

Date

9/18/2020

MC

Pay to the order of

S3 Solutions Consulting

\$102.70

10

One Hundred Two Dollars ⁰⁰/₁₀₀

Dollars

Heat Reactive Ink



SUNTRUST

ACH RT 061000104

Memo

[Handwritten signature]

MP

[Faint, mostly illegible text, possibly a routing slip or internal memo]

ENDORSE HERE
[Handwritten signature]
 CHECK HERE FOR MOBILE OR REMOTE DEPOSIT ONLY
AT _____ NAME OF FINANCIAL INSTITUTION _____ DATE _____
DO NOT WRITE, STAMP OR SIGN OVER THIS AREA
NESTLED IN THE FRONT OF THE CHECK

STSC
SUBPOENA SERVICES
FL-ORLANDO-7136

COPY REFERENCE: 20210528000181 SS
06/01/21 10:20:27 4 WEB JOBT10601101132
0076095936 20200921 07
15000.00 000000

ALLISON T RICHARD OR
ELIZABETH B BARNES OR SHELBY GREEN
PEOPLE FIRST LEADERSHIP
6035 BOYNTON HOMESTEAD
TALLAHASSEE, FL 32312

63-215/631

1006

Date 9/8/2020 MP

Pay to the order of FL Democratic Legislative Campaign Committee \$ 15,000.00
Fifteen thousand Dollars ^{00/100} of 100 Dollars Heat Reactive Ink

 **SUNTRUST** ACH RT 061000104

Memo Contribution

[Signature] MP

FAILS ON BACK.

092120 94950000007445 - >065503681<

ENDORSE HERE
FDLC Deposit Only
 CHECK HERE FOR MOBILE OR REMOTE DEPOSIT ONLY
NAME OF FIN. INSTITUTION: _____ DATE: _____
DO NOT WRITE STAMP OR SIGN BELOW THIS LINE



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



FEECases 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 20-630

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 why the information was 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 back 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 file 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 rapping 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 20-630

Respondent: Shelby Green

Complainant: Division of Elections

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I asked her why the information was 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 back 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

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- 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.*



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.

A stylized, handwritten signature in black ink, consisting of several overlapping loops and a long, sweeping tail that extends towards the upper right.

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



March 12, 2021

Shelby Green, in her capacity as treasurer for
People First Leadership Political Committee
Post Office Box 5651
Tallahassee, FL 32314

RE: Case No.: FEC 20-630; Respondent: Shelby Green

Dear Ms. Green:

On December 10, 2020, 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 People First Leadership Political Committee, a political committee registered with the Division of Elections, may have certified the 2020 G3 campaign treasurer's 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 People First Leadership Political Committee, a political committee registered with the Division of Elections, may have falsely reported or deliberately failed to include information in the 2020 G3 campaign treasurer's 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.

Shelby Green
March 12, 2021
Page 2
FEC 20-630

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.

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 **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/med

**DIVISION OF ELECTIONS
FEC NOTICE FORM**

To FEC from Division of Elections

Name: People First Leadership Political Committee
Account Number: 74041
Chairperson: Brice Barnes
Treasurer: Shelby Green
Registered Agent: Brice Barnes

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 were 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, of all contributions received and all expenditures made by or on behalf of the political committee in violation of section 106.06(1), Florida Statutes.

2020 G3

- On January 14, 2019, People First Leadership Political Committee (74041) registered as a political committee with the Division and has remained in an active status since that date. Brice Barnes is the chairperson and registered agent. Shelby Green is the treasurer.
- The 2020 G3 campaign treasurer's report was due on September 25, 2020. On September 25, 2020, Ms. Green filed the report showing expenditures in the amount of \$102.70. On October 2, 2020, Ms. Green amended the report adding \$30,000 in expenditures.

Sent By: Kristi Reid Willis *KRW*
Date: December 9, 2020

eal

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

(1) People First Leadership Political Committee (2) 74041
 Candidate, Committee or Party Name I.D. Number

(3) Post Office Box 14852 Tallahassee FL 32308
 Address (number and street) City State Zip Code

Check box if address has changed since last report

(4) Check appropriate box(es):

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

(5) REPORT IDENTIFIERS

Cover Period From 09/12/2020 To 09/18/2020 Report Type: G3

Original Amendment Special Election Report

(6) CONTRIBUTIONS THIS REPORT

Cash & Checks	\$2,000.00
Loans	\$0.00
<i>Total Monetary</i>	\$2,000.00
In-Kind	\$0.00

(7) EXPENDITURES THIS REPORT

Monetary Expenditures	\$30,102.70
Transfers to Office Account	\$0.00
<i>Total Monetary</i>	\$30,102.70

(8) Other Distributions

Certification

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

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

Name of Treasurer Deputy Treasurer

X
Signature

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

Name of Candidate Chairman (PC/PTY Only)

X
Signature

Name People First Leadership Political CommitteeReport: 2020 G3Period: 09/12/2020 to 09/18/2020**** Records in Filed Report ****

Seq #	Full Name (Last, Suffix, First, Middle)	Contributor	Occupation	Amount
Date	Street Address & City, State, Zip	Type	In-Kind Description	Amand
1	HEALTH NETWORK ONE INC	F	POLITICAL COMMITTEE	\$2,000.00
09/14/2020	2001 S ANDREWS AVE FORT LAUDERDALE, FL 33316	CHE		

Name: People First Leadership Political CommitteeReport: 2020 G3Period: 09/12/2020 to 09/18/2020**** Records in Filed Report ****

Seq # Date	Full Name (Last, Suffix, First, Middle Street Address & City, State, Zip	Type	Purpose	Amount Amend
1 09/15/2020	SB SOLUTIONS SB SOLUTIONS SB SOLUTIONS CONSULTING PO BOX 5651 TALLAHASSEE, FL 32314	MON	TREASURY AND COMPLIANCE SERVICES	\$102.70
2 09/12/2020	FLORIDA DEMOCRATIC LEGISLATIVE CAMPAIGN COMMITTEE PO BOX 1701 TALLAHASSEE, FL 32302	MON	CONTRIBUTION	\$15,000.00 ADD
3 09/18/2020	FLORIDA DEMOCRATIC LEGISLATIVE CAMPAIGN COMMITTEE PO BOX 1701 TALLAHASSEE, FL 32302	MON	CONTRIBUTION	\$15,000.00 ADD