### **BEFORE THE FEDERAL ELECTION COMMISSION**

CAMPAIGN LEGAL CENTER 1101 14th Street NW, Suite 400 Washington, DC 20005 Telephone (202) 736-2200

ROGER G. WIEAND 1101 14th Street NW, Suite 400 Washington, DC 20005

v.

MUR No.

TREAD STANDARD, LLC 1209 N. Orange Street Wilmington, DE 19801

ANY UNKNOWN PERSON(S) who made contributions to 34N22, Inc. and South Florida Residents First in the name of Tread Standard, LLC

### COMPLAINT

1. Tread Standard LLC, an entity with no apparent income or assets, no identifiable commercial activity, and no known physical or online presence — not even an address — has only one apparent function: to serve as a straw donor for political contributions, thus depriving voters of information essential to a transparent political process by concealing the true contributors' identities. Since 2015, this LLC has funneled at least \$680,000 in secret political contributions into federal, state, and local elections, and in just the past two years, Tread Standard has been used to hide the true sources of \$125,000 in contributions to two federal super PACs. This was a blatant violation of federal law.

34N22, Inc., an independent-expenditure only political committee ("IEOPC") — commonly referred to as a super PAC — that is registered with the Federal Election Commission ("FEC"), reported receiving a \$100,000 contribution from Tread Standard,

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LLC ("Tread Standard"), on March 30, 2022. South Florida Residents First, another IEOPC registered with the FEC, reported receiving a \$25,000 contribution from Tread Standard on November 3, 2020. As set forth in this complaint, there is reason to believe that Tread Standard was not the true source of the combined \$125,000 contributed in its name to these two committees, and that one or more unknown person(s) were, in fact, the true contributor(s).

- 3. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that Tread Standard and any persons that created, operated, and/or made contributions to 34N22 and South Florida Residents First in the name of Tread Standard violated the Federal Election Campaign Act ("FECA"), 52 U.S.C. § 30101, *et seq.* "If the Commission, upon receiving a complaint . . . has reason to believe that a person has committed, or is about to commit, a violation of [FECA] . . . [t]he Commission *shall make an investigation* of such alleged violation."<sup>1</sup>
- 4. There is no publicly available record of Tread Standard generating any income or engaging in any activities — aside from being used to make a combined \$680,000 in federal, state, and local political contributions — since it was registered as a Delaware domestic limited liability company ("LLC") in April 2015. Tread Standard has no known businesses, assets, investments, or commercial ventures, and does not have a website, a social media account, business listings or online records, or any other discernible online presence.
- 5. Overall, the available information supports the conclusion that Tread Standard did not have the means to contribute a combined \$125,000 to two IEOPCs absent an infusion of

<sup>&</sup>lt;sup>1</sup> 52 U.S.C. § 30109(a)(2) (emphasis added); see also 11 C.F.R. § 111.4(a).

funds provided to it for that specific purpose, and thus that one or more unknown true contributors provided funds to Tread Standard for the specific purpose of having it make these two contributions without disclosing the true contributors' identities.

6. Accordingly, there is reason to believe that one or more unknown person(s) violated the prohibition on making contributions in the name of another, 52 U.S.C. § 30122, and that Tread Standard violated the same provision by knowingly permitting its name to be used to effect the contributions of one or more other persons in its own name.

### FACTS

- 34N22, Inc. ("34N22") is an IEOPC that registered with the Commission on September 14, 2021, and Charles Gantt is its treasurer.<sup>2</sup> 34N22 reported receiving a \$100,000 contribution from Tread Standard on March 30, 2022.<sup>3</sup>
- South Florida Residents First is an IEOPC that registered with the Commission on January 6, 2020, and Paul Kilgore is its treasurer.<sup>4</sup> South Florida Residents First reported receiving a \$25,000 contribution from Tread Standard on November 3, 2020.<sup>5</sup>
- 9. "Tread Standard LLC" was organized in Delaware as a domestic limited liability company on April 30, 2015.<sup>6</sup> Documents filed by Tread Standard with the Delaware Department of State indicate that its registered agent is the Corporation Trust Company, located at "Corporation Trust Center, 1209 Orange St., Wilmington, DE 19801."<sup>7</sup> There is no publicly available information regarding the identities of Tread Standard's members, owners, or managers, its business purpose, or its mailing address.

<sup>&</sup>lt;sup>2</sup> 34N22, Inc., Statement of Org. (Sept. 14, 2021).

<sup>&</sup>lt;sup>3</sup> 34N22, Inc., 2022 April Quarterly Report at 12 (Apr. 15, 2022).

<sup>&</sup>lt;sup>4</sup> South Florida Residents First, Statement of Org. (Jan. 6, 2020).

<sup>&</sup>lt;sup>5</sup> South Florida Residents First, 2020 Post-Gen. Election Report at 9 (Nov. 24, 2020).

<sup>&</sup>lt;sup>6</sup> "Tread Standard LLC," Search Information, Delaware Dep't of State, Div. of Corps. (attached as Exhibit A).

<sup>&</sup>lt;sup>7</sup> Id.

- Approximately seven weeks after Tread Standard was organized, on June 17, 2015, Right to Rise USA, Inc. ("Right to Rise"), an IEOPC, received a \$150,000 contribution from Tread Standard.<sup>8</sup>
- On September 14, 2015, a complaint was filed with the FEC alleging that Tread Standard violated 52 U.S.C. § 30122 by knowingly permitting its name to be used to effect a \$150,000 contribution to Right to Rise.<sup>9</sup> The matter was numbered MUR 6968.
- 12. In a one-page response to the complaint filed with the FEC, which was included in the public MUR file after the matter was closed, Tread Standard summarily denied violating FECA as alleged and represented that it "is a corporation which . . . [made] a contribution to Right to Rise USA."<sup>10</sup>
- On May 8, 2018, the FEC deadlocked on whether to find reason to believe Tread
   Standard violated the law as alleged in the MUR 6968 complaint and closed the file.<sup>11</sup>
- 14. Two Commissioners (out of the four then serving) explained in a July 2, 2018, Statement of Reasons that they voted against finding reason to believe in MUR 6968 based on "considerations of due process, fair notice, and First Amendment clarity" because the Right to Rise contribution "occurred before 'the relevant notice date' (that is, April 1, 2016), when we issued our prior LLC Statement, which first articulated the correct legal standard in these types of matters" *i.e.*, matters involving an LLC allegedly used as a straw donor.<sup>12</sup>

<sup>&</sup>lt;sup>8</sup> Right to Rise USA, Inc., 2015 Mid-Year Report at 1416 (July 31, 2015).

<sup>&</sup>lt;sup>9</sup> Compl., MUR 6968 (Sept. 14, 2015). Neither Campaign Legal Center nor Roger Wieand was a complainant in MUR 6968.

<sup>&</sup>lt;sup>10</sup> Resp. of Tread Standard LLC, MUR 6968 (Nov. 4, 2015).

<sup>&</sup>lt;sup>11</sup> Certification, MUR 6968 (May 8, 2018).

<sup>&</sup>lt;sup>12</sup> Statement of Reasons of Chair Caroline C. Hunter and Commissioner Matthew S. Petersen at 3, MURs 6968, *et al.* (July 2, 2018).

- 15. Tread Standard's \$125,000 in federal contributions between 2020 and 2022 are not the only contributions made in its name since "the relevant notice date" of the Commissioners' LLC Statement.
- 16. Another IEOPC, Arizona Grassroots Action PAC, reported receiving a \$25,000 contribution in Tread Standard's name on October 12, 2016<sup>13</sup> *i.e.*, over six months after "the relevant notice date" of April 1, 2016, when three Commissioners issued the first Statement of Reasons articulating the legal standard they would apply to future LLC contributions.<sup>14</sup> That October 12, 2016 contribution was not part of the allegations raised in MUR 6968, which remained pending at the time the contribution was made.
- 17. Tread Standard has also been reported as the named contributor for multiple political contributions to state and local candidates and committees, totaling \$380,000, as follows:
  - a. \$210,000 to Friends of Ron DeSantis, a nonfederal committee supporting Florida Gov. Ron DeSantis's 2022 reelection campaign: \$50,000 on February 4, 2021;
    \$10,000 on April 13, 2021; \$50,000 on May 24, 2021; and \$100,000 on April 12, 2022.<sup>15</sup>
  - \$50,000 to the nonfederal account of the Republican Party of Florida, a state party committee, on November 9, 2020.<sup>16</sup>

<sup>15</sup> Campaign Contributions, Friends of Ron DeSantis, Florida Dep't of State, Div. of Elections, https://dos.elections.myflorida.com/campaign-finance/contributions/ (last visited May 17, 2022) (excerpt attached as Exhibit B); *see* Matt Dixon, *Mystery donor gives \$100K-plus to DeSantis*, Politico (June 3, 2021), https://www.politico.com/states/florida/story/2021/06/03/mystery-donor-gives-100k-plus-to-desantis-1384980.

<sup>&</sup>lt;sup>13</sup> Arizona Grassroots Action PAC, 2016 Pre-General Election Report at 8 (Oct. 27, 2016).

<sup>&</sup>lt;sup>14</sup> See Statement of Reasons of Chairman Matthew S. Petersen and Commissioners Caroline C. Hunter and Lee E. Goodman at 2, MURs 6485, *et al.* (Apr. 1, 2016) ("To provide clear public guidance on the appropriate standard that we will apply in future matters . . . the proper focus in these matters is whether the funds used to make a contribution were intentionally funneled through a closely held corporation or corporate LLC for the purpose of making a contribution that evades the Act's reporting requirements, making the individual, not the corporation or corporate LLC, the true source of the funds.").

<sup>&</sup>lt;sup>16</sup> Campaign Contributions (10/30/2020 – 12/31/2020), Republican Party of Florida, Florida Dep't of State, Div. of Elections (last visited May 17, 2022) (attached as Exhibit C).

- \$100,000 to Miami for Everyone, a nonfederal committee supporting Miami
   Mayor Francis Suarez, on June 30, 2021.<sup>17</sup>
- d. \$20,000 to Friends of Wilton Simpson, a nonfederal committee supporting Wilton Simpson, president of the Florida Senate, on January 10, 2022.<sup>18</sup>
- 18. While these \$380,000 in nonfederal contributions do not fall within the FEC's jurisdiction, they provide relevant information regarding Tread Standard's overall activity. That Tread Standard had no apparent business activity, investments, assets, or income, as explained below, yet was reported making \$380,000 in nonfederal contributions, supports finding reason to believe Tread Standard functioned exclusively as a conduit for the political contributions of others.
- 19. Tread Standard has no known business operations, investments, assets, or commercial ventures from which it might generate income of its own to make political contributions. Aside from Tread Standard's registration document, there is no publicly available information about the LLC; it does not appear to have any discernible public footprint:
  - a. Searches on Google provide no results that originate from Tread Standard itself or that detail any nonpolitical activity by Tread Standard; all results directly relate to one or more of its political contributions, or the now-closed enforcement matter (MUR 6968) in which Tread Standard was a respondent.<sup>19</sup>

<sup>&</sup>lt;sup>17</sup> Campaign Contributions (06/01/2021 - 06/30/2021), Miami for Everyone, Florida Dep't of State, Div. of Elections (last visited May 17, 2022) (attached as Exhibit D); *see* Jesse Scheckner, *With \$275K added in July, Miami Mayor Francis Suarez's reelection war chest grows to \$4.17M*, Florida Politics (Aug. 17, 2021), https://floridapolitics.com/archives/450935-with-275k-added-in-july-miami-mayor-francis-saurezs-reelection-war-chest-grows-to-4-17m/.

<sup>&</sup>lt;sup>18</sup> Contributions, Friends of Wilton Simpson, <u>http://friendsofwiltonsimpson.com/files/contributions.pdf</u> (last visited May 12, 2022) (excerpt attached as Exhibit E).

<sup>&</sup>lt;sup>19</sup> Google.com, Search results for "Tread Standard LLC", <u>https://www.google.com/search?q=%22Tread+Standard+LLC%22</u> (last visited May 16, 2022).

- b. Tread Standard does not appear to have a public website, or any account or page on Facebook, Instagram, or Twitter.
- c. There is no record of Tread Standard in searches with the Better Business Bureau,<sup>20</sup> Bloomberg's company profile search,<sup>21</sup> EDGAR,<sup>22</sup> or the U.S. Patent & Trademark Office's Trademark Electronic Search System.<sup>23</sup>
- 20. Since its formation in April 2015, Tread Standard does not appear to have engaged in any nonpolitical activity. Its only reported activity has been making \$300,000 in contributions to federal IEOPCs, along with \$380,000 in contributions to nonfederal committees.
- 21. The table below summarizes all of Tread Standard's reported political contributions:

Federal/Nonfederal	Recipient Committee	Date	Amount
Federal	Right to Rise USA	6/15/2015	\$150,000
Federal	Arizona Grassroots Action PAC	10/12/2016	\$25,000
Federal	South Florida Residents First	11/3/2020	\$25,000
Nonfederal	Republican Party of Florida	11/9/2020	\$50,000
Nonfederal	Friends of Ron DeSantis	2/4/2021	\$50,000
Nonfederal	Friends of Ron DeSantis	4/13/2021	\$10,000
Nonfederal	Friends of Ron DeSantis	5/24/2021	\$50,000
Nonfederal	Miami For Everyone	6/30/2021	\$100,000
Nonfederal	Friends of Wilton Simpson	1/10/2022	\$20,000
Federal	34N22, Inc.	3/30/2022	\$100,000
Nonfederal	Friends of Ron DeSantis	4/12/2022	\$100,000

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Nonfederal Total	\$380,000
Federal Total	\$300,000
Federal Total After	£125.000
MUR 6968 Closed	\$125,000

<sup>20</sup> See Better Business Bureau, Search Businesses and Charities, https://www.bbb.org/search/ (last visited Apr. 21, 2022).

<sup>21</sup> See Bloomberg, Company Search, https://www.bloomberg.com/ (last visited Apr. 21, 2022).

<sup>22</sup> U.S. Securities and Exchange Commission, EDGAR, https://www.sec.gov/edgar/search/ (last visited Apr. 21, 2022).

<sup>23</sup> See U.S. Patent & Trademark Office, Search Trademark Database, https://www.uspto.gov/trademarks/search (last visited Apr. 21, 2022).

### SUMMARY OF THE LAW

### Contributions in the Name of Another

- 22. FECA provides that "[n]o person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution and no person shall knowingly accept a contribution made by one person in the name of another person."<sup>24</sup>
- 23. The Commission regulation implementing the statutory prohibition provides the following examples of contributions in the name of another:
  - a. "Giving money or anything of value, all or part of which was provided to the contributor by another person (the true contributor) without disclosing the source of money or the thing of value to the recipient candidate or committee at the time the contribution is made."
  - b. "Making a contribution of money or anything of value and attributing as the source of the money or thing of value another person when in fact the contributor is the source."<sup>25</sup>
- 24. The requirement that a contribution be made in the name of its true source promotes Congress's objective of ensuring the complete and accurate disclosure by candidates and committees of the political contributions they receive,<sup>26</sup> and ensures that the public and complainants are fully informed about the true sources of political contributions and expenditures. Such transparency also enables voters, including complainant Wieand, to

<sup>&</sup>lt;sup>24</sup> 52 U.S.C. § 30122.

<sup>&</sup>lt;sup>25</sup> 11 C.F.R. § 110.4(b)(2)(i)-(ii).

<sup>&</sup>lt;sup>26</sup> United States v. O'Donnell, 608 F.3d 546, 553 (9th Cir. 2010) ("[T]he congressional purpose behind [Section 30122]—to ensure the complete and accurate disclosure of the contributors who finance federal elections—is plain."); Mariani v. United States, 212 F.3d 761, 775 (3d Cir. 2000) (rejecting constitutional challenge to section 30122 in light of the compelling governmental interest in disclosure).

have the information necessary to evaluate candidates for office, "make informed decisions[,] and give proper weight to different speakers and messages."<sup>27</sup>

- 25. FECA and Commission regulations provide that a person who furnishes another with funds for the purpose of contributing to a candidate or committee "makes" the resulting contribution, whether funds are advanced to another person to make a contribution in that person's name or promised as reimbursement of a solicited contribution.<sup>28</sup> Moreover, the "key issue . . . is the source of the funds" and, therefore, the legal status of the funds when conveyed from a conduit to the ultimate recipient is "irrelevant to a determination of who 'made' the contribution for the purposes of [Section 30122]."<sup>29</sup>
- 26. On April 1, 2016, then-Chair Petersen and then-Commissioners Hunter and Goodman issued a Statement of Reasons explaining their view regarding "the appropriate standard" to apply "in future matters" raising the allegation that an LLC was used to facilitate a contribution in the name of another.<sup>30</sup> The Commissioners explained that in their view, "the proper focus in these matters is whether the funds used to make a contribution were intentionally funneled through a closely held corporation or corporate LLC for the

<sup>&</sup>lt;sup>27</sup> *Citizens United v. FEC*, 558 U.S. 310, 369-71 (2010); *see also* Abby K. Wood, *Campaign Finance Disclosure*, 14 Ann. Rev. L. & Soc. Sci. 11, 19 (2018) ("Voters use heuristics, or informational shortcuts, to help them make the vote choice most aligned with their priorities without requiring encyclopedic knowledge . . . on every issue."); Elizabeth Garrett & Daniel A. Smith, *Veiled Political Actors and Campaign Disclosure Laws in Direct Democracy*, 4 Election L.J. 295, 296 (2005) (finding that knowing the sources of election messaging is a "particularly credible" informational cue for voters).

<sup>&</sup>lt;sup>28</sup> See United States v. Boender, 649 F.3d 650, 660 (7th Cir. 2011) (holding that to determine who made a contribution "we consider the giver to be the source of the gift, not any intermediary who simply conveys the gift from the donor to the donee."); *O'Donnell*, 608 F.3d at 550, 555; *Goland v. United States*, 903 F.2d 1247, 1251 (9th Cir. 1990) ("[FECA] prohibits the use of 'conduits' to circumvent . . . [reporting] restrictions.").

<sup>&</sup>lt;sup>29</sup> United States v. Whittemore, 776 F.3d 1074, 1080 (9th Cir. 2015) (holding that defendant's "unconditional gifts" to relatives and employees, along with the suggestion they contribute the funds to a specific political committee, violated Section 30122 because the source of the funds remained the individual who provided them to the putative contributors).

<sup>&</sup>lt;sup>30</sup> Statement of Reasons of Chairman Matthew S. Petersen and Commissioners Caroline C. Hunter and Lee E. Goodman at 2, MURs 6485, 6487, 6488, 6711, 6930 (Apr. 1, 2016), https://www.fec.gov/files/legal/murs/6487/1604 4391129.pdf.

purpose of making a contribution that evades the Act's reporting requirements, making the individual, not the corporation or corporate LLC, the true source of the funds."<sup>31</sup> The relevant factors that these Commissioners indicated they would consider included:

[whether] there is evidence indicating that the corporate entity did not have income from assets, investment earnings, business revenues, or bona fide capital investments, or was created and operated for the sole purpose of making political contributions. These facts would suggest the corporate entity is a straw donor and not the true source of the contribution.<sup>32</sup>

27. An April 15, 2022, Statement of Reasons by Chairman Allen Dickerson, Vice Chair

Steven T. Walther, and Commissioners Shana M. Broussard and Ellen L. Weintraub

reiterated that the public is now on notice that FECA's straw donor ban and Commission

regulations implementing that provision — *i.e.*, the "conduit contribution rules" — apply

when LLCs purport to make contributions to IEOPCs:

[T]he Commission [previously] did not agree whether, following *Citizens United* and *SpeechNow.org v. FEC*, respondent committees had received adequate notice that the Commission's LLC reporting rules and conduit contribution rules applied to contributions made to the newly formed IEOPCs authorized by those judicial rulings. With the passage of time, IEOPCs have become a regular part of the campaign finance landscape, and adequate notice to the public now exists. Consequently, there is *no longer a lack of clarity* concerning the application of LLC reporting rules and conduit contribution rules in these circumstances.<sup>33</sup>

Accordingly, the FEC has made clear that the public is "on notice" that the straw donor

ban applies in such circumstances, and thus prohibits any person from funneling a

contribution to an IEOPC through an LLC.

<sup>&</sup>lt;sup>31</sup> *Id*.

<sup>&</sup>lt;sup>32</sup> *Id.* at 12.

<sup>&</sup>lt;sup>33</sup> Statement of Reasons of Chairman Allen Dickerson, Vice Chair Steven T. Walther, Commissioner Shana M. Broussard, and Commissioner Ellen L. Weintraub at 2, MUR 7454 (Apr. 15, 2022) (emphases added).

- 28. Straw donor contributions like those alleged here are serious violations of federal campaign finance law that have led to criminal indictments and convictions in recent years.<sup>34</sup> As explained in one such indictment, the straw donor ban works in tandem with other campaign finance laws to protect the integrity of our electoral system and to ensure that all candidates, campaign committees, federal regulators, and the public are informed of the true sources of money spent to influence federal elections.<sup>35</sup> Another recent indictment highlighted how straw donor schemes have been used to skirt FECA's source prohibitions, such as the ban on contributions by government contractors.<sup>36</sup>
- 29. Even for contributions that would otherwise be legal *i.e.*, contributions that would not be prohibited or excessive, if made in the true contributor's own name the prohibition of contributions in the name of another serves FECA's core transparency purposes by ensuring that voters have access to complete and accurate information regarding the sources of electoral contributions.

<sup>&</sup>lt;sup>34</sup> See Colin Moynihan, Lev Parnas, Ex-Giuliani Ally, Is Convicted of Campaign Finance Charges, N.Y. Times (Oct. 22, 2021), https://www.nytimes.com/2021/10/22/nyregion/lev-parnas-guilty-giuiliani.html; Dep't of Justice, Lev Parnas and Igor Fruman Charged with Conspiring to Violate Straw and Foreign Donor Bans (Oct. 10, 2019), https://www.justice.gov/usao-sdny/pr/lev-parnas-and-igor-fruman-charged-conspiring-violate-straw-and-foreigndonor-bans; Dep't of Justice, Entertainer/Businessman and Malaysian Financier Indicted for Conspiring to Make and Conceal Foreign and Conduit Contributions During 2012 U.S. Presidential Election (May 10, 2019), https://www.justice.gov/opa/pr/entertainerbusinessman-and-malaysian-financier-indicted-conspiring-make-andconceal-foreign.

<sup>&</sup>lt;sup>35</sup> Grand Jury Indictment, *United States v. Lev Parnas, et al.*, Cr. No. 19-725 (S.D.N.Y. Oct. 10, 2019), https://www.justice.gov/usao-sdny/press-release/file/1208281/download.

<sup>&</sup>lt;sup>36</sup> Dep't of Justice, *Former Government Contractor Executives Indicted for Unlawful Campaign Contributions* (Feb. 10, 2022), https://www.justice.gov/opa/pr/former-government-contractor-executives-indicted-unlawful-campaign-contributions.

### **CAUSE OF ACTION**

### <u>Count I:</u> Tread Standard LLC and the unknown person(s) Who Contributed to 34N22, Inc. and South Florida Residents First in the Name of Tread Standard LLC Violated 52 U.S.C. § 30122

- 30. The available information supports the conclusion that Tread Standard was not the true contributor of either the \$25,000 contributed in its name to South Florida Residents First, or the \$100,000 contributed in its name to 34N22. Indeed, the available information indicates that Tread Standard served as a straw donor for these two federal contributions, merely transmitting the funds of the true contributors to these two IEOPCs just as it may have also done for \$555,000 in other federal and nonfederal contributions.
- 31. When the FEC deadlocked and closed MUR 6968 in 2018, the Commissioners voting against a reason to believe finding pointed out to Tread Standard specifically, and the regulated community generally that their 2016 Statement of Reasons had already notified the public that the FEC would closely examine whether "funds used to make a contribution were intentionally funneled through a closely held corporation or corporate LLC for the purpose of making a contribution."<sup>37</sup>
- 32. Indeed, as four Commissioners stated again in April 2022: "[A]dequate notice to the public now exists. Consequently, there is no longer a lack of clarity concerning the application of LLC reporting rules and conduit contribution rules in these circumstances."<sup>38</sup>

<sup>&</sup>lt;sup>37</sup> Statement of Reasons of Chairman Matthew S. Petersen and Commissioners Caroline C. Hunter and Lee E. Goodman at 2, MURs 6485, *et al.* (Apr. 1, 2016).

<sup>&</sup>lt;sup>38</sup> Statement of Reasons of Chairman Allen Dickerson, Vice Chair Steven T. Walther, Commissioner Shana M. Broussard, and Commissioner Ellen L. Weintraub at 2, MUR 7454 (Apr. 15, 2022).

- 33. Nevertheless, despite being "on notice" that the straw donor ban applies to LLC conduits, the unknown persons that created and operated Tread Standard have, since 2018, *repeatedly* made sizable federal and nonfederal contributions in Tread Standard's name, while Tread Standard has engaged in no apparent activity aside from serving as a shell company for political contributions and established no discernible presence as a *bona fide* "going concern."
- 34. Tread Standard has no documented activities or verifiable presence: despite being organized in April 2015, it has no website, social media account, or substantive online presence aside from news articles and reports regarding its political contributions.<sup>39</sup>
- 35. This lack of any apparent activity supports the conclusion that Tread Standard neither conducted any real business nor had sufficient income from capital assets, investment earnings, or revenues from which it could have made \$125,000 in federal contributions to two IEOPCs, absent the provision of funds given for that specific purpose.
- 36. The unknown individuals operating Tread Standard have reportedly contributed \$380,000 in the LLC's name to multiple nonfederal candidates and committees, with \$210,000 going to a state committee supporting Ron DeSantis, \$50,000 to the Republican Party of Florida's nonfederal account, \$100,000 to a committee supporting Miami Mayor Francis Suarez, and \$20,000 to a committee supporting Florida Senate President Wilton Simpson.<sup>40</sup> Moreover, Tread Standard had previously been used to contribute \$150,000 to Right to Rise, which was the basis for the allegations in MUR 6968, and \$25,000 to a different IEOPC, Arizona Grassroots Action PAC. These prior contributions represent a

<sup>&</sup>lt;sup>39</sup> See supra notes 19-23 and related text.

<sup>&</sup>lt;sup>40</sup> See supra notes 15-18 and related text.

financial burden that a company without any documented activity, assets, or *bona fide* income streams would almost certainly not be able to meet.

- 37. These facts provide reason to believe that Tread Standard was used to make \$25,000 and \$100,000 contributions to South Florida Residents First and 34N22, respectively, with funds "intentionally funneled through" the LLC. That funneling is precisely what FECA's straw donor ban prohibits, as the FEC has repeatedly affirmed.
- 38. The available facts, viewed as a whole, therefore provide reason to believe that Tread Standard served as a straw donor for a \$25,000 contribution to South Florida Residents First, and a \$100,000 contribution to 34N22.
- 39. Accordingly, there is reason to believe that the unknown person(s) who created, operated, and/or contributed through Tread Standard violated 52 U.S.C. § 30122 by making contributions in the name of another. Furthermore, there is reason to believe that Tread Standard violated 52 U.S.C. § 30122 when it knowingly permitted its name to be used to effect contributions of one or more other persons in its name.

### **PRAYER FOR RELIEF**

- 40. Wherefore, the Commission should find reason to believe that Tread Standard, LLC, and any person(s) who created, operated, and made contributions to or in the name of this entity have violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
- 41. Further, the Commission should seek appropriate sanctions for any and all violations, including civil penalties sufficient to deter future violations, injunctive relief to remedy these violations and prohibit any and all future violations, and such additional remedies as are necessary and appropriate to ensure compliance with FECA.

Respectfully submitted,

<u>/s/ Saurav Ghosh</u> Campaign Legal Center, by Saurav Ghosh, Esq. 1101 14th Street NW, Suite 400 Washington, DC 20005 (202) 736-2200

<u>/s/ Roger G. Wieand</u> Roger G. Wieand 1101 14th Street NW, Suite 400 Washington, DC 20005 (202) 736-2200

Saurav Ghosh, Esq. Campaign Legal Center 1101 14th Street NW, Suite 400 Washington, DC 20005 Counsel to the Campaign Legal Center, Roger G. Wieand

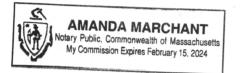
May 19, 2022

### VERIFICATION

The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.

Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Roger G. Wieand



Roger G. Wieand

Sworn to and subscribed before me this  $19^{\text{H}}_{\text{day}}$  of May 2022.

Notary Public

### VERIFICATION

The complainants listed below hereby verify that the statements made in the attached

Complaint are, upon their information and belief, true.

Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Campaign Legal Center

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Saurav Ghosh, Esq.

Sworn to and subscribed before me this  $\underline{19^{tk}}$  day of May 2022.

Notary Public



## EXHIBIT A

Delaware.gov

Governor | General Assembly | Courts | Elected Officials | State Agencies

Department of State: Division of Corporations						Allowable Characters
HOME			Entity Details		-	
		THIS IS NO	OT A STATEMENT OF	GOOD STANDING	=	
	File Number:	5738997	Incorporation Date / Formation Date:			
	Entity Name:	TREAD STAND	ARD LLC			
	Entity Kind:	Limited Liability Company	Entity Type:	General		
	Residency:	Domestic	State:	DELAWARE		
	REGISTERED AGENT I	NFORMATION				
	Name:	THE CORPORA	ATION TRUST COMPA	NY		
	Address:	CORPORATION	N TRUST CENTER 120	09 ORANGE ST		
	City:	WILMINGTON	County:	New Castle		
	State:	DE	Postal Code:	19801		
	Phone:	302-658-7581				
	Additional Information is more detailed information and more for a fee of \$20 Would you like O Status Submit	n including curren 0.00.	t franchise tax assessm			
	View Search Results		New Entity Search	]		

For help on a particular field click on the Field Tag to take you to the help area.

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# EXHIBIT B



### **Contributions Query Results**

About the Campaign Finance Data Base If all contributions for a reporting period are less than 1 dollar they may not be displayed.

Search Criteria: Detail of Committees

Election Year: All

With Candidate Last Name Starts With: Friends of Ron DeSantis

Committee Type: All

Candidate/Committee	Date	Amount Typ Contributor Name	Address	City State Zip	Occupation Inkind Desc
Friends of Ron DeSantis (PAC)	03/24/2022	10,000.00 CHE 13855 CORNHUSKER PARTNERS, LLC	1600 N.W. 163RD STREET	MIAMI, FL 33169	REAL ESTATE
Friends of Ron DeSantis (PAC)	07/26/2021	10,000.00 CHE 13TH FLOOR INVESTMENTS	2850 TIGERTAIL AVENUE, #701	MIAMI, FL 33133	REAL ESTATE
Friends of Ron DeSantis (PAC)	10/08/2018	5,000.00 CHE 16000 PINES RETAIL INVESTMENTS, LLC	P. O. BOX 330609	MIAMI, FL 33233	RETAIL MANAGEMENT
Friends of Ron DeSantis (PAC)	09/28/2021	25,000.00 CHE 1699 RIDGE ROAD CORPORATION	400 ANDREWS ST., SUITE 500	ROCHESTER, NY 14604	REAL ESTATE DEVELOPM
Friends of Ron DeSantis (PAC)	04/29/2022	100.00 CHE 17TH STREET DISCOUNT PHARMACY, INC.	2506 B S.E. 17TH STREET	OCALA, FL 34471	
Friends of Ron DeSantis (PAC)	01/26/2022	25,000.00 CHE 191 SW 12 OWNER LLC	104 5TH AVENUE 9TH FL.	NEW YORK, NY 10011	REAL ESTATE
Friends of Ron DeSantis (PAC)	10/04/2018	1,000.00 CHE 1ST COAST RECYCLING, INC.	108 SEABOARD DRIVE	PALATKA, FL 32177	RECYCLING
Friends of Ron DeSantis (PAC)	06/22/2021	100.00 CHE 1ST ENVIROSAFETY	7110 DRUM DR	SAINT JAMES CITY, FL 33956	
Friends of Ron DeSantis (PAC)	09/20/2021	1,000.00 CHE 1ST HERITAGE CORP.	139 SUNRISE AVE. APT 104	PALM BEACH, FL 33480	JEWELRY DESIGN
Friends of Ron DeSantis (PAC) Friends of Ron DeSantis (PAC)	04/23/2021	25,000.00 CHE 2012 SIEGFRIED FAMILY TRUST	100 WORTH AVENUE #512	PALM BEACH, FL 33480	TRUST
Friends of Ron DeSantis (PAC)	07/14/2021 09/22/2021	38.00 CHE 2D LAND & CATTLE LLC 5.00 CHE 2M AUTO TRANSPORT CORP	10103 SE 154TH AVE 21150 SW 87TH AVE APT 203	WHITE SPRINGS, FL 32096 CUTLER BAY, FL 33189	
Friends of Ron DeSantis (PAC)	08/11/2021	500.00 CHE 3 TDA LLC	PO BOX 1675	TALLAHASSEE, FL 32302	HEALTH CARE
Friends of Ron DeSantis (PAC)	12/16/2019	1,000.00 CHE 300-17 INVESTMENT, LLC	2200 BISCAYNE BLVD.	MIAMI, FL 33137	HOSPITALITY
Friends of Ron DeSantis (PAC)	02/04/2021	25,000.00 CHE 302 SANFORD LLC	141 FIFTH AVENUE #2ND FL	NEW YORK, NY 10010	REAL ESTATE
Friends of Ron DeSantis (PAC)	08/18/2021	5,000.00 CHE 305-NO-FAULT, INC	1561 TAGUS AVENUE	CORAL GABLES, FL 33156	MEDICAL & ATTORNEY R
Friends of Ron DeSantis (PAC)	05/20/2021	5,000.00 CHE 3080 GABLES LENDING CORP.	3850 BIRD ROAD #8TH FL	MIAMI, FL 33146	FINANCIAL SERVICES
Friends of Ron DeSantis (PAC)	07/18/2021	83.00 CHE 30A COTTAGES	497 SERENOA RD UNIT 2	SANTA ROSA BEACH, FL 32459	
Friends of Ron DeSantis (PAC)	07/13/2021	100.00 CHE 3RD WAVE DEVELOPMENT	712 PONCA TRAIL	MAITLAND, FL 32751	
Friends of Ron DeSantis (PAC)	04/17/2021	250.00 CHE 4C ENGINEERING, LLC	5903 SPRUCE DRIVE	FORT PIERCE, FL 34982	ENGINEERING FIRM
Friends of Ron DeSantis (PAC)	07/14/2021	73.00 CHE 52 PICK UP LLC	21209 LAKE VIENNA DR	LAND O LAKES, FL 34638	
Friends of Ron DeSantis (PAC)	09/10/2021	100.00 CHE 5MG NEW YORK CORP	465 E KESLEY LN	JACKSONVILLE, FL 32259	
Friends of Ron DeSantis (PAC)	02/12/2018	10,000.00 CHE 5PALMS OF ORMOND BEACH	515 TOMOKA AVENUE	ORMOND BEACH, FL 32174	HEALTH CARE
Friends of Ron DeSantis (PAC)	05/20/2021	5,000.00 CHE 6340 SUNSET CORP.	3850 BIRD ROAD #8TH FL	MIAMI, FL 33146	REAL ESTATE
Friends of Ron DeSantis (PAC)	02/02/2022	5,000.00 CHE 814 SAND, INC.	12030 HIGHWAY 77	PANAMA CITY, FL 32409	CONSTRUCTION
Friends of Ron DeSantis (PAC)	11/14/2019	1,000.00 CHE 820 MEDICAL BUILDING, LLC	3880 39TH SQUARE	VERO BEACH, FL 32960	HEALTH SERVICES
Friends of Ron DeSantis (PAC)	05/06/2018	2,500.00 CHE 84-A HOLDINGS, LLC	7480 S.W. 40TH STREET, #700	MIAMI, FL 33155	REAL ESTATE
Friends of Ron DeSantis (PAC)	11/30/2021	2,000.00 CHE A BARTER CONSULTING LLC	3516 BAYSWATER DR.	PENSACOLA, FL 32514	BUSINESS CONSULTING
Friends of Ron DeSantis (PAC)	08/05/2021	25.00 CHE A COONES MARK	4525 SW 44TH CT	OCALA, FL 34474	
Friends of Ron DeSantis (PAC)	07/15/2021	100.00 CHE A GRANDE CHOICE POOL & SPA, INC.	3235 TOWHEE ST	ENGLEWOOD, FL 34224	
Friends of Ron DeSantis (PAC) Friends of Ron DeSantis (PAC)	09/26/2018 12/09/2020	17,900.00 CHE A HEALTHIER ST. JOHNS 5.000.00 CHE A HEALTHIER ST. JOHNS	8489 CABIN HILL ROAD 1103 HAYS STREET	TALLAHASSEE, FL 32311 TALLAHASSEE, FL 32301	POLITICAL ORGANIZATI
Friends of Ron DeSantis (PAC)	06/28/2019	10,000.00 CHE A HEALTHIER ST. JOHNS	1103 HAYS STREET	TALLAHASSEE, FL 32301	POLITICAL ORGANIZATI
Friends of Ron DeSantis (PAC)	11/30/2021	2,000.00 CHE A HEALTHIER ST. JOHNS	1103 HAYS STREET	TALLAHASSEE, FL 32301	
Friends of Ron DeSantis (PAC)	07/15/2021	19.00 CHE A JULIANO DAVID	739 MCCARDLE DR	WEST CHESTER, PA 19380	
Friends of Ron DeSantis (PAC)	07/28/2021	25.00 CHE A LINHARES ANDRE	15985 CITRUS KNOLL DR	WINTER GARDEN, FL 34787	
Friends of Ron DeSantis (PAC)	08/04/2021	25.00 CHE A MASTER'S TOUCH RESTORATIVE CLEANING	4250 N. INDIANHEAD ROAD	HERNANDO, FL 34442	
Friends of Ron DeSantis (PAC)	07/16/2021	28.00 CHE A NATIONAL ELECTRIC SERVICE	3881 CRYSTAL LAKE DR APT 4	DEERFIELD BEACH, FL 33064	
Friends of Ron DeSantis (PAC)	07/14/2021	19.00 CHE A OBERKROM CHERYL	120 ELMCREST CT	SAINT CHARLES, MO 63301	
Friends of Ron DeSantis (PAC)	01/26/2021	25,000.00 CHE A STRONGER FLORIDA	2640-A MITCHAM DRIVE	TALLAHASSEE, FL 32308	POLITICAL ORGANIZATI
Friends of Ron DeSantis (PAC)	02/05/2021	20,000.00 CHE A STRONGER FLORIDA	2640-A MITCHAM DRIVE	TALLAHASSEE, FL 32308	POLITICAL ORGANIZATI
Friends of Ron DeSantis (PAC)	09/07/2018	5,000.00 CHE A STRONGER FLORIDA	2640-A MITCHAM DRIVE	TALLAHASSEE, FL 32308	
Friends of Ron DeSantis (PAC)	12/31/2021	25,000.00 CHE A STRONGER FLORIDA	2640-A MITCHAM DRIVE	TALLAHASSEE, FL 32308	
Friends of Ron DeSantis (PAC)	12/03/2021	10,000.00 CHE A&A TRANSFER STORAGE	P.O. BOX 2317	FORT WALTON BEACH, FL 32549	MOVING & STORAGE
Friends of Ron DeSantis (PAC)	07/14/2021	19.00 CHE A&JS TREE & LANDSCAPE SERVICES	21731 3RD AVE	MOUNT DORA, FL 32757	
Friends of Ron DeSantis (PAC)	10/04/2018	25,000.00 CHE A. DUDA & SONS, INC.	P. 0. BOX 620257	OVIEDO, FL 32762	AGRICULTURE
Friends of Ron DeSantis (PAC)	03/30/2021	25,000.00 CHE A. DUDA & SONS, INC.	P.O. BOX 620257	OVIEDO, FL 32762	AGRICULTURE
Friends of Ron DeSantis (PAC)	03/25/2022	3,500.00 CHE A. PHELPS PETROLEUM OF NW FL, INC.	17760 BEACH PARK TRAIL	PANAMA CITY BEACH, FL 32413	PETROLEUM
Friends of Ron DeSantis (PAC) Friends of Ron DeSantis (PAC)	04/05/2022 04/26/2021	1,500.00 CHE A. PHELPS PETROLEUM OF NW FL, INC. 400.00 CHE A.C. SCHULTES OF FLORIDA, INC.	17760 BEACH PARK TRAIL 11865 U.S. HWY. 41 S.	PANAMA CITY BEACH, FL 32413 GIBSONTON, FL 33534	PETROLEUM WATER WELL CONTRACTO
Friends of Ron DeSantis (PAC)	05/26/2021	5,000.00 CHE A.W. BAYLOR VERSAPANEL-PLASTERING, INC.		ORMOND BEACH, FL 32175	DRYWALL CONTRACTOR
Friends of Ron DeSantis (PAC)	09/23/2021	5,000.00 CHE A.W. BAYLOR VERSAPANEL-PLASTERING, INC. 500.00 CHE A/C DOCTORS	1199 NORTHEAST BAYSIDE PLACE	JENSEN BEACH, FL 34957	HVAC SERVICES
Friends of Ron DeSantis (PAC)	10/21/2021	50.00 CHE A/C DOCTORS, INC.	1199 NORTHEAST BAYSIDE PLACE	JENSEN BEACH, FL 34957	The Services
Friends of Ron DeSantis (PAC)	08/04/2021	25.00 CHE AANONSON MARK	3040 INDIAN RIVER DR NE	PALM BAY, FL 32905	
Friends of Ron DeSantis (PAC)	07/14/2021	19.00 CHE AARDEMA PETER	6380 REDINGTON DR SE	ADA, MI 49301	
Friends of Ron DeSantis (PAC)	05/05/2021	100.00 CHE AARON CHRISTINE	219 WILLOW AVENUE #1324	ANNA MARIA, FL 34216	
Friends of Ron DeSantis (PAC)	08/30/2021	100.00 CHE AARON JEFF	766 TERRA PL	MAITLAND, FL 32751	
Friends of Ron DeSantis (PAC)	09/21/2021	100.00 CHE AARON JEFF	766 TERRA PL	MAITLAND, FL 32751	
Friends of Ron DeSantis (PAC)	10/26/2021	95.00 CHE AARON JEFF	766 TERRA PL	MAITLAND, FL 32751	
Friends of Ron DeSantis (PAC)	07/15/2021	57.00 CHE AARON STEVE	1508 TULLAMORE LN	FAYETTEVILLE, NC 28303	
Friends of Ron DeSantis (PAC)	06/13/2021	25.00 CHE AARONSON JOANNE	11490 WATERHAVEN CT	RESTON, VA 20190	
Friends of Ron DeSantis (PAC)	10/08/2019	1,000.00 CHE AARUP KUBAL, M.D. P.A.	18101 COLLINS AVENUE #306	NORTH MIAMI BEACH, FL 33160	OPTOMETRY

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#### Contributions Query Results - Division of Elections - Florida Department of State

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		TRAX REGINA
		TRAX PEST CONTROL
5,000.00		TRAYLOR DOUGLAS
		TRAYLOR DOUGLAS
100.00	CHE	TRAYNOR MICHAEL
25.00	CHE	TRAYNOR MICHAEL
100.00	CHE	TRAYNOR MICHAEL
		TREAD STANDARD LLC
50,000.00	CHE	TREAD STANDARD, LLC
10,000.00	CHE	TREAD STANDARD, LLC
		TREAD STANDARD, LLC
		TREADWAY GLORIA S.
		TREADWELL MONICA
100.00	CHE	TREADWELL MONICA
85,000.00	CHE	TREAS ISLAND, LLC
500.00	CHE	TREASURE COAST OPTOMETRIC SOCIETY, INC.
5,000.00	CHE	TREASURE ISLAND MARINA
		TREBUS STEVEN V
19.00	CHE	TRECASTELLI JOHN
		TRECKER DEBBIE
		TREDICK TRAFTON
		TREDRAY GRAHAM
		TREEPAC PC, INC.
		TREESH TERRY
		TREETOPS INVESTORS LLC
		TREHEY PAULA
38.00	CHE	TREICHLER SUZANNE
		TREINEN ELIZABETH
		TREMBLAY ERIC
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		TRENKLER HILDE
50.00	CHE	TRENNER ROBERT
15.00	CHE	TRENT CINDY
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		TRENTALANGE MARIANNE
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		TREPANIER DAVE
38.00	CHE	TREPANIER PAM
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19.00	CHE	TRETT PATRICIA
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5,000.00	CHE	TREVERTON SHELLY
5.00	CHE	TREVILLA AMANDA
47.00	CHE	TRGO AU
6,000,00	CHE	TRI COUNTY LANDSCAPE CONTRACTORS, INC.
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https://dos.elections.myflorida.com/cgi-bin/contrib.exe

# EXHIBIT C



### **Contributions Query Results**

About the Campaign Finance Data Base If all contributions for a reporting period are less than 1 dollar they may not be displayed

#### Search Criteria:

Detail of Committees

Election Year: 2020 General Election

With Candidate Last Name Starts With: Republican Party of Florida

Committee Type: All

Contributor Starting Date: 10/30/2020 Contributor Ending Date: 12/31/2020

Inkind Desc Candidate/Committee Date Amount Typ Contributor Name Address City State Zin Occupation Republican Party of Florida (PTY) 11/09/2020 20.000.00 CHE 1-800 CONTACTS, INC. 66 E. WADSWORTH PARK DRIVE, 3RD EL DRAPER, UT 84020 CONTACT LENSES Republican Party of Florida (PTY) 25.000.00 CHE ALTRIA CLIENT SERVICES. LLC RTCHMOND, VA 23285 TOBACCO PRODUCTS 12/07/2020 PO BOX 85088 25,000.00 CHE ARBOR PROPERTIES, INC. 4910 N. MONROE STREET TALLAHASSEE, FL 32303 PROPERTY MANAGEMENT Republican Party of Florida (PTY) 12/07/2020 Republican Party of Florida (PTY) 20,000.00 CHE ARDIAN ZIKA CAMPAIGN 5471 SPRING HILL DR SPRING HILL, FL 34606 12/07/2020 Republican Party of Florida (PTY) 10/30/2020 150,000.00 CHE ASSOCIATED INDUSTRIES OF FLORIDA 516 N ADAMS STREET TALLAHASSEE, FL 32301 TNSURANCE Republican Party of Florida (PTY) 11/30/2020 25,000,00 CHE BOB ROMMEL CAMPATGN 7633 MULBERRY LN NAPLES, FL 34114 124 WEST TEEERSON STREET Republican Party of Florida (PTY) 12/16/2020 295.00 INK CAPITAL CITY CONSULTING, LLC TALLAHÁSSEE, FL 32301 GOVERNMENTAL CONSULT EVENT LOGISTICS Republican Party of Florida (PTY) 12/07/2020 5,000.00 CHE CLAY YARBOROUGH CAMPAIGN PO BOX 351035 TACKSONVTILE EL 32235 Republican Party of Florida (PTY) 12/07/2020 25,000,00 CHE COLLEEN BURTON CAMPATGN ACCOUNT 133 HARBOR DR S VENTCE, EL 34285 Republican Party of Florida (PTY) 11/24/2020 15,000.00 CHE COMCAST CORPORATION 1701 JOHN F. KENNEDY BLVD. ONE COMCAST C PHILADELPHIA, PA 19103 BROADCASTING Republican Party of Florida (PTY) 11/19/2020 25,000.00 CHE COMCAST CORPORATION 1701 JOHN F. KENNEDY BLVD. ONE COMCAST C PHILADELPHIA, PA 19103 BROADCASTING Republican Party of Florida (PTY) 11/24/2020 1,000.00 CHE COMCAST FINANCIAL AGENCY CORPORATION 1701 JOHN F KENNEDY BLVD PHILADELPHIA, PA 19103 TELEVISION Republican Party of Florida (PTY) 11/24/2020 4.000.00 CHE COMCAST ETNANCIAL AGENCY CORPORATION 1701 JOHN E KENNEDY BLVD PHTLADELPHTA, PA 19103 TELEVISION Republican Party of Florida (PTY) 11/09/2020 7.200.00 CHE CONSERVATIVES FOR PRINCIPLED LEADERSHIP 1103 HAYS ST TALLAHASSEE, EL 32301 Republican Party of Florida (PTY) NEPTUNE BEACH, FL 32266 12/07/2020 5,022 63 CHE CORD BYRD CAMPATON 724 5TH ST Republican Party of Florida (PTY) 25,000.00 CHE CYNDI STEVENSON CAMPAIGN PO BOX 600726 JACKSONVILLE, FL 32260 12/17/2020 Republican Party of Florida (PTY) 12/14/2020 5 000 00 CHE DANA TRABILI SY CAMPATON 5428 STATELY OAKS ST FORT PIERCE, FL 34981 Republican Party of Florida (PTY) TORACCO 11/09/2020 10,000.00 CHE DOSAL TOBACCO CORPORATION 4775 NW 132 STREET MIAMI, FL 33054 Republican Party of Florida (PTY) INTERNET COMMERCE 12/11/2020 7 500 00 CHE EBAY THC 7700 W PARMER IN BLDG D AUSTIN, TX 78729 Republican Party of Florida (PTY) 12/07/2020 3,000.00 CHE ELIZABETH FETTERHOFF CAMPAIGN PO BOX 2536 DELAND, EL 32721 2055 NW DIAMOND CREEK WAY JENSEN BEACH, FL 34957 Republican Party of Florida (PTY) 11/30/2020 25,000,00 CHE ENGINEERING A BETTER FUTURE Republican Party of Florida (PTY) 11/02/2020 30,000.00 CHE ENGINEERING A BETTER FUTURE 2055 NW DIAMOND CREEK WAY JENSEN BEACH, FL 34957 Republican Party of Florida (PTY) 11/20/2020 9,500.00 CHE ENGINEERING A BETTER FUTURE 2055 NW DIAMOND CREEK WAY JENSEN BEACH, FL 34957 Republican Party of Florida (PTY) 11/19/2020 250.00 CHE FAITH FARMS, INC 1106 GATNES RD LEARY, GA 39862 FARM Republican Party of Florida (PTY) 11/30/2020 10,000.00 CHE FLORIDA ARCHITECTS PAC 104 E JEFFERSON ST TALLAHASSEE, FL 32301 Republican Party of Florida (PTY) 12/10/2020 6,020.00 INK FLORIDA POWER & LIGHT COMPANY 134 W JEFFERSON ST TALLAHASSEE, FL 32301 UTILITIES FOOD, BEVERAGE & ACT Republican Party of Florida (PTY) 12/11/2020 2,500.00 CHE FRIENDS OF DAVID SMITH 1103 HAYS ST TALLAHASSEE, FL 32301 Republican Party of Florida (PTY) 12/22/2020 1,000.00 CHE FRIENDS OF SCOTT PLAKON 1015 TUFTON CV LAKE MARY, FL 32746 Republican Party of Florida (PTY) 12/11/2020 5,500.00 CHE GENENTECH, INC. 1 DNA WAY, MS 36 SOUTH SAN FRANCISCO, CA 94080 DNA TESTING CENTER Republican Party of Florida (PTY) 12/23/2020 15,000.00 CHE GENERAL MOTORS COMPANY 25 MASSACHUSETTS AVE NW STE 400 WASHINGTON, DC 20001 Republican Party of Florida (PTY) 11/30/2020 500.00 CHE GOODWOOD MUSEUM & GARDENS, INC. 1600 MICCOSUKEE ROAD TALLAHASSEE, FL 32308 MUSEUM Republican Party of Florida (PTY) 11/23/2020 5,000.00 CHE GOWLAND DOUGLAS R. SHIPPING EXECUTIVE 7019 HTLLCREEK LN GATES MILLS, OH 44040 Republican Party of Florida (PTY) 11/09/2020 1,000.00 CHE GRAGG GREGORY INVESTMENT MANAGEMEN 510 W. 5TH STREET KANSAS CITY, MO 64105 Republican Party of Florida (PTY) 11/02/2020 50,000.00 CHE HERITAGE MGA, LLC 2600 MCCORMICK DRIVE, STE. 300 CLEARWATER, FL 33759 TNSURANCE Republican Party of Florida (PTY) FERNANDINA BEACH, FL 32034 11/12/2020 500 00 CHE HOPE FOR THE FUTURE 701 STANLEY DR 101 S CAPITOL BLVD STE 302 Republican Party of Florida (PTY) 11/18/2020 55,000.00 CHE IDAHO REPUBLICAN PARTY BOTSE, TD 83702 Republican Party of Florida (PTY) 11/30/2020 25,000,00 CHE JASON SHOAF CAMPATEN 216 GAUTIER MEMORIAL LN PORT SAINT JOE, FL 32456 Republican Party of Florida (PTY) 12/11/2020 5,000.00 CHE JAYER WILLIAMSON CAMPAIGN 2640A MITCHAM DR TALLAHASSEE, FL 32308 Republican Party of Florida (PTY 12/07/2020 5,000.00 CHE JOE HARDING CAMPAIGN ACCOUNT PO BOX 791 WILLISTON, FL 32696 Republican Party of Florida (PTY) 11/17/2020 25,000.00 CHE JOHN SNYDER CAMPAIGN 4239 SW HIGH MEADOWS AVE 201 PALM CITY, FL 34990 Republican Party of Florida (PTY) 11/03/2020 5,000.00 CHE KEISER BELINDA 6069 NW 87TH AVE PARKLAND, FL 33067 COLLEGE ADMINISTRATO Republican Party of Florida (PTY) 11/09/2020 150 00 CHE KELLEY HENRY 4245 HAZELHURST DR MTLTON EL 32571 TECHNOLOGY MANAGER Republican Party of Florida (PTY 12/07/2020 25,000.00 CHE LAUREN MELO CAMPAIGN 1103 HAYS ST TALLAHASSEE, FL 32301 Republican Party of Florida (PTY) VENICE, FL 34285 11/30/2020 25,000,00 CHE MTCHAEL GRANT CAMPATGN 133 HARBOR DR Republican Party of Florida (PTY) 2,000.00 CHE MICHELLE SALZMAN FOR FLORIDA HOUSE DISTR 2172 W NINE MILE RD # 603 PENSACOLA, FL 32534 12/14/2020 Republican Party of Florida (PTY) 12/11/2020 5.000.00 CHE MTCROSOFT 3900 44TH AVE S FARGO, ND 58104 TECHNOLOGY TALLAHASSEE, FL 32301 Republican Party of Florida (PTY) 1,000.00 CHE MIKE BELTRAN CAMPAIGN 12/11/2020 1103 HAVS ST Republican Party of Florida (PTY) TALLAHASSEE, FL 32302 12/07/2020 10.000.00 CHE N. F. FLA. CHAMBER ALLTANCE PO BOX 11309 Republican Party of Florida (PTY) 11/19/2020 25,000.00 CHE NBCUNIVERSAL MEDIA LLC 100 UNTVERSAL CTTY PLAZA UNTVERSAL CTTY, CA 91608 MEDTA Republican Party of Florida (PTY) 50,000.00 CHE NEXTERA ENERGY CAPITAL HOLDINGS INC. JUNO BEACH, FL 33408 11/09/2020 700 UNIVERSE BLVD. ENERGY Republican Party of Florida (PTY) 12/18/2020 50,000.00 CHE NEXTERA ENERGY CAPITAL HOLDINGS INC. 700 UNTVERSE BLVD. JUNO BEACH, FL 33408 ENERGY Republican Party of Florida (PTY) 12/16/2020 25,000.00 CHE NEXTERA ENERGY CAPITAL HOLDINGS INC. 700 UNTVERSE BLVD. JUNO BEACH, FL 33408 ENERGY Republican Party of Florida (PTY) 11/17/2020 25,000.00 CHE NICK DICEGLIE CAMPAIGN 2840 W BAY DR # 211 BELLEAIR BLUFFS, FL 33770 Republican Party of Florida (PTY) 12/07/2020 10,000.00 CHE NW FLA. CHAMBER ALLIANCE PO BOX 11309 TALLAHASSEE, FL 32302 Republican Party of Florida (PTY) 12/08/2020 9,250.00 CHE PALM BEACH PROSPERITY FUND 235 VIRGINIA ST TALLAHASSEE, FL 32301 11,000.00 CHE PANHANDLE PROSPERITY FUND PC Republican Party of Florida (PTY) 11/30/2020 115 E PARK AVE STE 1 TALLAHASSEE, FL 32301 Republican Party of Florida (PTY) 12/31/2020 25,000.00 CHE PAUL RENNER CAMPAIGN 70 RIVERVIEW BND S 713 PALM COAST, FL 32137

### 5/18/22, 11:44 AM

### Contributions Query Results - Division of Elections - Florida Department of State

o, 10/22, 11.117 uu		Contributiono Quory recou		a Boparanona or otato		
Republican Party of Florida (PTY)	12/14/2020	12,500.00 CHE PUBLIX SUPER MARKETS, INC.	PO BOX 407	LAKELAND, FL 33802	RETAIL GROCERY	
Republican Party of Florida (PTY)	12/09/2020	12,500.00 CHE PUBLIX SUPER MARKETS, INC.	PO BOX 407	LAKELAND, FL 33802	RETAIL GROCERY	
Republican Party of Florida (PTY)	12/14/2020	-12,500.00 CHE PUBLIX SUPER MARKETS, INC.	PO BOX 407	LAKELAND, FL 33802		
Republican Party of Florida (PTY)	12/08/2020	14,000.00 CHE RALPH MASSULLO CAMPAIGN	2640A MITCHAM DR	TALLAHASSEE, FL 32308		
Republican Party of Florida (PTY)	12/07/2020	5,000.00 CHE RANDY MAGGARD CAMPAIGN	1103 HAYS ST	TALLAHASSEE, FL 32301		
Republican Party of Florida (PTY)	12/15/2020	50,000.00 CHE REALTORS POLITICAL ADVOCACY COMMITTEE	7025 AUGUSTA NATIONAL DR	ORLANDO, FL 32822		
Republican Party of Florida (PTY)	12/03/2020	100.00 CHE REPUBLICAN WOMEN OF OKALOOSA FEDERATED	PO BOX 1202	SHALIMAR, FL 32579		
Republican Party of Florida (PTY)	11/13/2020	25,000.00 CHE RIVEREND, LLC	1877 S. FEDERAL HIGHWAY, STE. 310	BOCA RATON, FL 33432	REAL ESTATE	
Republican Party of Florida (PTY)	11/17/2020	25,000.00 CHE ROBERT B PAYNE CANDIDATE FOR STATE REP	2700 FAIRWAY DR	PALATKA, FL 32177		
Republican Party of Florida (PTY)	12/31/2020	5,000.00 CHE ROBERT CORTES FOR STATE HOUSE DST. 30	PO BOX 162941	ALTAMONTE SPRINGS, FL 32716		
Republican Party of Florida (PTY)	12/09/2020	100,000.00 CHE ROSATTI JOHN	105 US HIGHWAY 1	NORTH PALM BEACH, FL 33408	RESTAURANT ENTREF	PREN
Republican Party of Florida (PTY)	12/07/2020	10,000.00 CHE S. E. FLA. CHAMBER ALLIANCE	PO BOX 11309	TALLAHASSEE, FL 32302		
Republican Party of Florida (PTY)	11/30/2020	15,000.00 CHE SAM GARRISON CAMPAIGN	1103 HAYS ST	TALLAHASSEE, FL 32301		
Republican Party of Florida (PTY)	11/03/2020	10,000.00 CHE SAVE FLORIDA JOBS, INC	230 S ADAMS ST	TALLAHASSEE, FL 32301		
Republican Party of Florida (PTY)	12/09/2020	100,000.00 CHE STALUPPI JOHN	2325 SNUG HARBOR DRIVE	PALM BEACH GARDENS, FL 33410	CAR SALES	
Republican Party of Florida (PTY)	11/12/2020	1,243.11 CHE STATE OF FLORIDA	DEPARTMENT OF FINANCIAL SERVICES 200	EAS TALLAHASSEE, FL 32399	GOVERNMENT	
Republican Party of Florida (PTY)	12/17/2020	15,000.00 CHE SUNSHINE GASOLINE DISTRIBUTORS, INC.	1650 NW 87TH AVENUE	DORAL, FL 33172	GASOLINE DISTRIBU	UTOR
Republican Party of Florida (PTY)	11/02/2020	100.30 INT SUNTRUST BANK	215 S MONROE STREET, SUITE 120	TALLAHASSEE, FL 32301	BANK	
Republican Party of Florida (PTY)	12/01/2020	61.15 INT SUNTRUST BANK	215 S MONROE STREET, SUITE 120	TALLAHASSEE, FL 32301		
Republican Party of Florida (PTY)	11/09/2020	25,000.00 CHE SURTERRA FLORIDA, LLC	1639 VILLAGE SQUARE BLVD.	TALLAHASSEE, FL 32309	PHARMACEUTICALS	
Republican Party of Florida (PTY)	11/09/2020	65,000.00 CHE TECO ENERGY, INC.	702 N. FRANKLIN STREET	TAMPA, FL 33602	UTILITIES	
Republican Party of Florida (PTY)	11/12/2020	15,000.00 CHE TENET HEALTH	PO BOX 130300	DALLAS, TX 75313	HEALTH CARE	
Republican Party of Florida (PTY)	11/12/2020	15,000.00 CHE TENET HEALTH	PO BOX 130300	DALLAS, TX 75313	HEALTH CARE	
Republican Party of Florida (PTY)	11/23/2020	25,000.00 CHE THE 2020 TOM LEEK CAMPAIGN ACCOUNT	120 JOHN ANDERSON DR	ORMOND BEACH, FL 32176		
Republican Party of Florida (PTY)	12/29/2020	15,000.00 CHE TOBY OVERDORF CAMPAIGN ACCOUNT	PO BOX 1893	PALM CITY, FL 34991		
Republican Party of Florida (PTY)	11/09/2020	50,000.00 CHE TREAD STANDARD LLC	1209 N ORANGE ST	WILMINGTON, DE 19801	REAL ESTATE	
Republican Party of Florida (PTY)	12/14/2020	2,500.00 CHE TYLER I SIROIS CAMPAIGN ACCOUNT	125 E MERRITT ISLAND CSWY STE 107	MERRITT ISLAND, FL 32952		
Republican Party of Florida (PTY)	11/09/2020	1,018.00 INK UNITED AUTOMOBILE INSURANCE CO.	1313 NW 167TH STREET	MIAMI GARDENS, FL 33169	INSURANCE	AIR TRAVEL
Republican Party of Florida (PTY)	11/16/2020	1,580.00 INK UNITED AUTOMOBILE INSURANCE CO.	1313 NW 167TH STREET	MIAMI GARDENS, FL 33169	INSURANCE	AIR TRAVEL
Republican Party of Florida (PTY)	12/07/2020	10,000.00 CHE W CENTRAL FLA CHAMBER ALLIANCE	PO BOX 11309	TALLAHASSEE, FL 32302		
Republican Party of Florida (PTY)	11/17/2020	25,000.00 CHE WILL ROBINSON CAMPAIGN	2920 PARK LAKE DR	BRADENTON, FL 34209		
Republican Party of Florida (PTY)	11/09/2020	1,500.00 CHE WOLFE TERRENCE C.	6800 BIRD RD # 475	MIAMI, FL 33155	LOBBYIST	
	Total:	1,622,790.19				

89 Contribution(s) Selected

Query the Campaign Finance Data Base

[Department of State] [Division of Elections] [Campaign Finance - Contributions]

# EXHIBIT D



### **Contributions Query Results**

About the Campaign Finance Data Base If all contributions for a reporting period are less than 1 dollar they may not be displayed.

Search Criteria: Detail of Committees

Election Year: All

With Candidate Last Name Starts With: Miami for Everyone

Committee Type: All

#### Contributor Starting Date: 06/01/2021

Contributor Ending Date: 06/30/2021

Candidate/Committee	Date	Amount Typ Contributor Name	Address	City State Zip	Occupation Inkind Desc
Miami For Everyone (PAC)	06/02/2021	25,000.00 CHE 31ST REALTY LLC	333 EISENHOWER PKY	LIVINGSTON, NJ 07039	REAL ESTATE
Miami For Everyone (PAC)	06/11/2021	1,800.00 CHE ALEXANDER MANAGEMENT	770 MIDDLE NECK RD, SUITE P7	GREAT NECK, NY 11023	PROPERTY MANAGEMENT
Niami For Everyone (PAC)	06/04/2021	5,000.00 CHE ARBOR REALTY SR, INC. ARTPAC	333 EAGLE OVINGTON BLVD.	UNIONDALE, NY 11553	REAL ESTATE
liami For Everyone (PAC)	06/03/2021	25,000.00 CHE ATLANTIC PACIFIC COMMUNITIES, LLC	161 NORTHWEST 6 STREET, 1020	MIAMI, FL 33136	REAL ESTATE DEVELOPE
liami For Everyone (PAC)	06/03/2021	2,500.00 CHE AVELLO ANDRES	478 BAY LANE	KEY BISCAYNE, FL 33149	PADDLE SPORTS RENTAL
Niami For Everyone (PAC)	06/08/2021	1,000.00 CHE BEN-CHANOCH NADAV	3825 BAYSIDE CT	MIAMI, FL 33133	CHIEF OF STAFF - HOL
liami For Everyone (PAC)	06/09/2021	20,000.00 CHE BLUE SKY HOLDINGS USA INC	2300 E LAS OLAS BLVD FL 4	FORT LAUDERDALE, FL 33301	REAL ESTATE
liami For Everyone (PAC)	06/24/2021	20,000.00 CHE BLUMBERG DAVID	415 CENTER ISLAND DRIVE	GOLDEN BEACH, FL 33160	VENTURE CAPITALIST
liami For Everyone (PAC)	06/02/2021	1,000.00 CHE BLUMENFELD DAVID	330 ROBBINS LANE	SYOSSET, NY 11791	REAL ESTATE
iami For Everyone (PAC)	06/28/2021	90,000.00 CHE BOEHLY TODD, L.	865 HOLLOW TREE RIDGE RD	DARIEN, CT 06820	CEO HOLDING CO
iami For Everyone (PAC)	06/02/2021	20,000.00 CHE BOOK ROBERT	200 FIESTA WAY	FORT LAUDERDALE, FL 33301	VENTURE CAPITALIST
iami For Everyone (PAC)	06/11/2021	1,500.00 CHE BRANCATO JOSEPH	49 KENT DR.	CORTLANDT MANOR, NY 10567	ARCHITECT
iami For Everyone (PAC)	06/09/2021	100.00 CHE BRESLIN BRIAN	1040 NORTHEAST 85TH STREET	MIAMI, FL 33138	
iami For Everyone (PAC)	06/07/2021	2,500.00 CHE BUNSEN AUSTIN	121 NE 34TH ST APT 2316	MIAMI, FL 33137	CHIEF TECHNOLOGY OFF
iami For Everyone (PAC)	06/09/2021	1,000.00 CHE CANTOR MAX	1331 BRICKELL BAY DRIVE, APT 1011	MIAMI, FL 33131	FITNESS COACH
iami For Everyone (PAC)	06/30/2021	25,000.00 CHE CEROS FINANCIAL SERVICES INC	1445 RESEARCH BLVD STE 530	ROCKVILLE, MD 20850	BROKERAGE FIRM
iami For Everyone (PAC)	06/29/2021	100,000.00 CHE CLEAN-RITE MAINTENANCE, LLC	233 BROADWAY SUITE 2305	NEW YORK, NY 10279	COMMERCIAL CLEANING
iami For Everyone (PAC)	06/04/2021	5,000.00 CHE COASTAL CONSTRUCTION SERV. GROUP	5959 BLUE LAGOON DR, SUITE 200	MIAMI, FL 33126	CONSTRUCTION FIRM
iami For Everyone (PAC)	06/30/2021	10,000.00 CHE COASTLAND CONSTRUCTION, INC	7740 SW 104TH STREET SUITE 201	MIAMI, FL 33156	CONSTRUCTION COMPANY
iami For Everyone (PAC)	06/08/2021	25,000.00 CHE COLLINS TAYLOR	314 CLEMATIS STREET, 200	WEST PALM BEACH, FL 33401	REAL ESTATE
iami For Everyone (PAC)	06/09/2021	500.00 CHE CONSORTIUM	675 HUDSON ST, #4S	NEW YORK, NY 10014	RETAIL ONLINE
iami For Everyone (PAC)	06/09/2021	1,000.00 CHE DANGEL JUSTIN	47 WEST DILIDO DRIVE	MIAMI BEACH, FL 33139	TECH INVESTOR
iami For Everyone (PAC)	06/02/2021	5,000.00 CHE DELUCCA DONALD	3109 GRAND AVE	MIAMI, FL 33133	PUBLIC SAFETY ADVISO
iami For Everyone (PAC)	06/22/2021	5,000.00 CHE DEUTCH DAVID, O.	10050 SW 63RD AVE	PINECREST, FL 33156	REAL ESTATE
iami For Everyone (PAC)	06/08/2021	1,000.00 CHE DRUMMOND ALAN	3740 IRVINGTON AVENUE	MIAMI, FL 33133	HOTELIER
iami For Everyone (PAC)	06/01/2021	500.00 CHE ENGEL RYAN	118 WEST 12TH STREET	NEW YORK, NY 10011	FITNESS INSTRUCTOR
iami For Everyone (PAC)	06/04/2021	1,000.00 CHE ESRUBILSKY MICHAEL	10300 SABAL PALM AVE	CORAL GABLES, FL 33156	ANGEL INVESTOR
iami For Everyone (PAC)	06/07/2021	5,000.00 CHE FOLKMAN DANIEL	9821 EAST BAY HARBOR DRIVE, 506	BAY HARBOR ISLANDS, FL 33154	VP FOOD DELIVERY APP
iami For Everyone (PAC)	06/11/2021	500.00 CHE FULLER ROBERT, W.	750 KAPPOCK ST., APT. 603	BRONX, NY 10463	ARCHITECT
iami For Everyone (PAC)	06/02/2021	1,000.00 CHE GREENBERG TRAURIG	8400 NW 36TH ST, STE 400	DORAL, FL 33166	LAW FIRM
iami For Everyone (PAC)	06/11/2021	2,500.00 CHE JOBANPUTRA JALAK	2842 SHERIDAN AVENUE	MIAMI BEACH, FL 33140	VENTURE CAPITALIST
iami For Everyone (PAC)	06/30/2021	10,000.00 CHE JORDA ENTERPRISES INC.	1510 NW 79TH AVE	DORAL, FL 33126	MECHANICAL CONTRACTO
iami For Everyone (PAC)	06/02/2021	2,600.00 CHE JSG EQUITIES LLC	240 MADISON AVE SUITE 15	NEW YORK, NY 10016	REAL ESTATE INVESTME
iami For Everyone (PAC)	06/07/2021	2,500.00 CHE KAMENETZKY DAVID	50 SOUTH POINTE DRIVE, APT 1206 N	MIAMI BEACH, FL 33139	INVESTOR
iami For Everyone (PAC)	06/30/2021	25,000.00 CHE KAR WYN DEVELOPMENT, LLC	92 SW 3RD ST	MIAMI, FL 33130	REAL ESTATE
iami For Everyone (PAC)	06/10/2021	2,500.00 CHE KILMAN JONATHAN	5600 PINE TREE DRIVE	MIAMI BEACH, FL 33140	ATTORNEY
iami For Everyone (PAC)	06/02/2021	25,000.00 CHE L&L HOLDING COMPANY, LLC	142 WEST 57TH STREET, 18TH FLOOR	NEW YORK, NY 1001	REAL ESTATE
iami For Everyone (PAC)	06/30/2021	25,000.00 CHE LANDRY'S MANAGEMENT, LP	1510 WEST LOOP SOUTH	HOUSTON, TX 77027	FOOD INDUSTRY
iami For Everyone (PAC)	06/08/2021	1,000.00 CHE LEFRAK JAMES	15055 BISCAYNE BLVD, FL 23	NORTH MIAMI, FL 33181	REAL ESTATE
iami For Everyone (PAC)	06/07/2021	1,000.00 CHE LINARES DANET	1609 S. BAYSHORE DRIVE	MIAMI, FL 33133	COMMERCIAL RE BROKER
iami For Everyone (PAC)	06/07/2021	1,000.00 CHE LONSTEIN DANIEL	1643 BRICKELL AVE, APT 3702	MIAMI, FL 33129	CEO COMMUNICATIONS
iami For Everyone (PAC)	06/04/2021	25,000.00 CHE LOPEZ JORGE	461 ARVIDA PARKWAY	CORAL GABLES, FL 33156	TRANSPORTATION DESIG
iami For Everyone (PAC)	06/08/2021	500.00 CHE LUND CARYN	78 SOUTHWEST 7TH STREET	MIAMI, FL 33130	PUBLIC AFFAIRS CONSU
iami For Everyone (PAC)	06/25/2021	10,000.00 CHE MAGIC CITY PROPERTIES I, LLC	1 SE 3RD AVE SUITE 2110	MIAMI, FL 33131	REAL ESTATE DEVELOPE
iami For Everyone (PAC)	06/30/2021	10,000.00 CHE MATA CONSULT, INC.	5085 NW 7TH ST APT 1001	MIAMI, FL 33126	LOBBYING FIRM
iami For Everyone (PAC)	06/30/2021	10,000.00 CHE MCDO HOME SERVICES GROUP LLC	320 NW 40TH ST	MIAMI, FL 33127	FOOD INDUSTRY
ami For Everyone (PAC)	06/07/2021	10,000.00 CHE MCLARTY BRIANNA	6125 LUTHER LANE, PMB 427	DALLAS, TX 75225	COLLEGE STUDENT
iami For Everyone (PAC)	06/07/2021	10,000.00 CHE MCLARTY FRANKLIN	6125 LUTHER LANE, PMB 427	DALLAS, TX 75225	INVESTOR-ACQUISITONS
iami For Everyone (PAC)	06/05/2021	1,000.00 CHE MILCIUNAS JOHN PAUL	3951 NORTH OCEAN BOULEVARD	DELRAY BEACH, FL 33483	INVESTMENT FUND MANA
iami For Everyone (PAC)	06/02/2021	15,000.00 CHE MOCCA CONSTRUCTION	3080 SOUTHWEST 38TH COURT	MIAMI, FL 33146	CONSTRUCTION CO
iami For Everyone (PAC)	06/02/2021	5,000.00 CHE MOINIAN JOSEPH	3 COLUMBUS CIRCLE 26TH FLOOR	NEW YORK, NY 10019	CEO INVESTMENT CO
ami For Everyone (PAC)	06/08/2021	500.00 CHE MOSHKANI KASRA	7200 SOUTHWEST 137TH STREET	PALMETTO BAY, FL 33158	CEO OYO
iami For Everyone (PAC)	06/09/2021	500.00 CHE NICHOLAS WILLIAM	624 MICHIGAN AVENUE, 7	MIAMI BEACH, FL 33139	AVIATION TECH
iami For Everyone (PAC)	06/02/2021	5,000.00 CHE PAGE D.C.	110 N PROSPECT DR	CORAL GABLES, FL 33133	PUBLIC RELATIONS
iami For Everyone (PAC)	06/01/2021	2,500.00 CHE PARDUE JOSHUA	101 SOUTH 12TH STREET, STE 102	TAMPA, FL 33602	REAL ESTATE
iami For Everyone (PAC)	06/16/2021	25,000.00 CHE PERLMAN ANDREW	1000 BRICKELL PLAZA, 5502	MIAMI, FL 33131	MEDIA/PRIVATE EQUITY

### Contributions Query Results - Division of Elections - Florida Department of State

06/04/2021	10,000.00 CHE YOUNG DONALD, C.	1000 BISCAYNE BLVD UNIT 2101	MIAMI, FL 33132	FINANCE/INVESTMENTS
06/09/2021	1,000.00 CHE YANG SIZHAO	777 BRICKELL AVE, STE 50096854	MIAMI, FL 33131	INVESTOR
06/09/2021	200.00 CHE WONG KYLE	1300 S MIAMI AVE, UNIT 3610	MIAMI, FL 33130	CHAIRMAN TECH CO
06/09/2021	500.00 CHE WONG JASON	8387 GRAND PRIX LANE	BOYTON BEACH, FL 33472	INVESTOR
06/04/2021	1,000.00 CHE WONG JASON	8387 GRAND PRIX LANE	BOYTON BEACH, FL 33472	INVESTOR
06/22/2021	5,000.00 CHE WOLFSON III LOUIS	9595 JOURNEY'S END LANE	CORAL GABLES, FL 33156	REAL ESTATE DEVELOPE
06/30/2021	5,000.00 CHE WLNY HOLDINGS, INC.	270 S. SERVICE ROAD SUITE 55	MELVILLE, NY 11747	BROADCAST MEDIA COMP
06/12/2021	10,000.00 CHE WILLIAMSON SAMUEL	280 RIVERSIDE DR, APT 5A	NEW YORK, NY 10025	ATTORNEY
		4775 COLLINS AVE		FINANCE
				RESTAURANTEUR
				RISK MITIGATION COMP
				SENIOR DIRECTOR
				REAL ESTATE
				LIVING TRUST
				MANAGING DIRECTOR
				INVESTMENT BANKER
				CEO TECH APP
				INVESTMENT BROKER TECHNOLOGIST
				CEO RETAIL GROUP
				REAL ESTATE
				STONE MANUFACTURER
				RETIRED
	06/30/2021 06/22/2021 06/04/2021 06/09/2021 06/09/2021 06/09/2021	06/30/2021         10,000.00         CHE REYES GRANTTE & MARRLE CORP.           06/02/2021         20,000.00         CHE SCHOTTENSTEIN JOSEPH           06/03/2021         20,000.00         CHE SCHOTTENSTEIN JAY           06/03/2021         2,500.00         CHE SCHOTTENSTEIN JAY           06/03/2021         1,000.00         CHE SIGGEL STEPHEN           06/03/2021         1,000.00         CHE SINGH SONNY           06/03/2021         1,000.00         CHE SINGH SONNY           06/03/2021         5,000.00         CHE SINGH SONNY           06/03/2021         1000.00         CHE SINGH SONNY           06/03/2021         1000.00         CHE SINGH SONNY           06/03/2021         1000.00         CHE SINGH SONNY           06/23/2021         1000.00         CHE THE TIMOTHY DRAPER LIVING TRUST           06/32/2021         1,000.00         CHE WORTALD SUEN           06/02/2021         1,000.00         CHE WORTALD SUEN           06/12/2021         10,000.00         CHE WORTALD SUEN           06/12/2021         10,000.00         CHE WORTALD SUEN           06/22/2021         10,000.00         CHE WORTALD SUEN           06/22/2021         5,000.00         CHE WORTALD SUEN           06/02/2021         5,000.00	06/30/2021       10,000.00 CHE REVES GRANITE & MARBLE CORP.       7905 NW 60TH ST.         06/02/2021       20,000.00 CHE SCHOTTENSTEIN JOSEPH       4555 PINE TREE DRIVE         06/03/2021       20,000.00 CHE SCHOTTENSTEIN JOSEPH       4300 EAST STH AVENUE         06/03/2021       2,500.00 CHE SCHOTTENSTEIN JAY       4300 EAST STH AVENUE         06/03/2021       2,500.00 CHE SIGH SONNY       27 JUNO ROAD         06/03/2021       1,000.00 CHE SINGH SONNY       27 JUNO ROAD         06/03/2021       5,000.00 CHE SINGH SONNY       27 JUNO ROAD         06/03/2021       5,000.00 CHE SINGH SONNY       801 ARTHUR GODREFY, 402A         06/03/2021       5,000.00 CHE STARKER STEVEN       801 ARTHUR GODREFY, 402A         06/21/2021       10,000.00 CHE THE TIMOTHY DRAPER LIVING TRUST       55 EAST 3RD AVENUE         06/22/2021       10,000.00 CHE UNTRACHT ARI       176 EAST 77TH STREET         06/02/2021       5,000.00 CHE VOGTLAND SVEN       460 NORTHEAST 22H STREET         06/12/2021       10,000.00 CHE WILLIAMSON SAMUEL       280 RIVERSIDE DR, APT 5A         06/32/2021       5,000.00 CHE WILLIAMSON SAMUEL       280 RIVERSIDE DR, APT 5A         06/32/2021       5,000.00 CHE WILLIAMSON SAMUEL       280 RIVERSIDE DR, APT 5A         06/32/2021       5,000.00 CHE WORD SASON       8387 GRAND PRIX LANE	06/30/2021       10,000.00       CHE REVES GRANTTE & MARRLE CORP.       7905 NW 60TH ST.       MTAMI, FL 33166         06/02/2021       20,000.00       CHE SCHOTTENSTEIN JOSEPH       4555 PINE TREE DRIVE       MTAMI BEACH, FL 33140         06/03/2021       20,000.00       CHE SCOTTENSTEIN JAY       4300 EAST 5TH AVENUE       COLUMBUS, OH 43219         06/03/2021       2,500.00       CHE SIGEL STEPHEN       G31 PARK AVENUE       NEW YORK, NY 10065         06/03/2021       1,000.00       CHE SISNEROS JAMES       1300 SOUTH MIAMI AVENUE, 1604       MIAMI, FL 33130         06/03/2021       5,000.00       CHE SISNEROS JAMES       36 ZACCHEUS MEAD LN       GREENNICH, CT 06631         06/03/2021       5,000.00       CHE STARKER STEVEN       36 ZACCHEUS MEAD LN       GREENNICH, CT 06631         06/03/2021       100,000.00       CHE STARKER STEVEN       36 ZACCHEUS MEAD LN       GREENNICH, CT 06631         06/30/2021       100,000.00       CHE TIMOTHY DRAPER LIVING TRUST       55 EAST 3RD AVENUE       SAN MATEO, CA 94401         06/22/2021       100,000.00       CHE UNTRACHT ARI       176 EAST 77TH STREET       NELWINGTN, DE 19801         06/02/2021       1,000.00       CHE VOGTLAND SVEN       400 NORTHEAST 23TH STREET       MIAMI, FL 33130         06/12/2021       1,0000.00       CHE WOGTLAND SVEN

80 Contribution(s) Selected

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# EXHIBIT E

### **Contributions**

### Friends of Wilton Simpson

Date Updated

Page

Date	Amount	Contributor	Address	City / State / Zipcode	Occupation	Туре
01/10/2022	\$500.00	Levine, Bradley M	504 South Lake Drive	Latana, FL 33462	Technology Executive	Check
01/10/2022	\$20,000.00	Floridians for Economic Advancement	1700 North Monroe Street, Suite 11-325	Tallahassee, FL 32303	Political Committee	Check
01/10/2022	\$13,000.00	Floridians for Economic Freedom	2055 Northwest Diamond Creek Way	Jensen Beach, FL 34957	Political Committee	Check
01/10/2022	\$20,000.00	Tread Standard, LLC	1209 Orange Street	Wilmington, DE 19801	Real Estate	Check
01/10/2022	\$45,000.00	Education for All	120 South Monroe Street	Tallahassee, FL 32301	Political Committee	Check
01/10/2022	\$250.00	Williams, Carolyn	9445 Bristol Ridge Court	West Palm Beach, FL 33411	Retired	Check
01/10/2022	\$10,000.00	Women Building the Future	115 East Park Avenue, Suite 1	Tallahassee, FL 32301	Political Committee	Check
01/10/2022	\$1,000.00	Altizer, Tiffany	1525 Nottingham Street	Orlando, FL 32803	Accountant	Check
01/10/2022	\$1,000.00	Guillama, Noel J	929 Cedar Cove Road	Wellington, FL 33414	Health Care Executive	Check
01/10/2022	\$2,500.00	McAlpin, Caryl	1286 Country Club Oaks Circle	Orlando, FL 32804	Real Estate	Check
01/10/2022	\$1,000.00	Kilsheimer & Associates, Inc.	2377 Home Again Road	Apopka, FL 32712	Public Relations	Check
01/10/2022	\$10,000.00	Florida Education Association Advocacy Fund	213 South Adams Street	Tallahassee, FL 32301	Political Committee	Check