

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**In Re: RSLC - Florida**

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**Case No.: FEC 23-196**

**TO:** RSLC - Florida  
Dee Duncan, Chair  
1201 F Street NW, Suite 6  
Washington, DC 20004

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

**NOTICE OF HEARING (AUTOMATIC FINE (AF))**

A hearing will be held in this case before the Florida Elections Commission on, **August 13, 2024 at 1:00 p.m., or as soon thereafter as the parties can be heard**, at the following location: **412 Knott Building, Pat Thomas Committee Room, 404 South Monroe Street, 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  
July 23, 2024

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

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

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

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

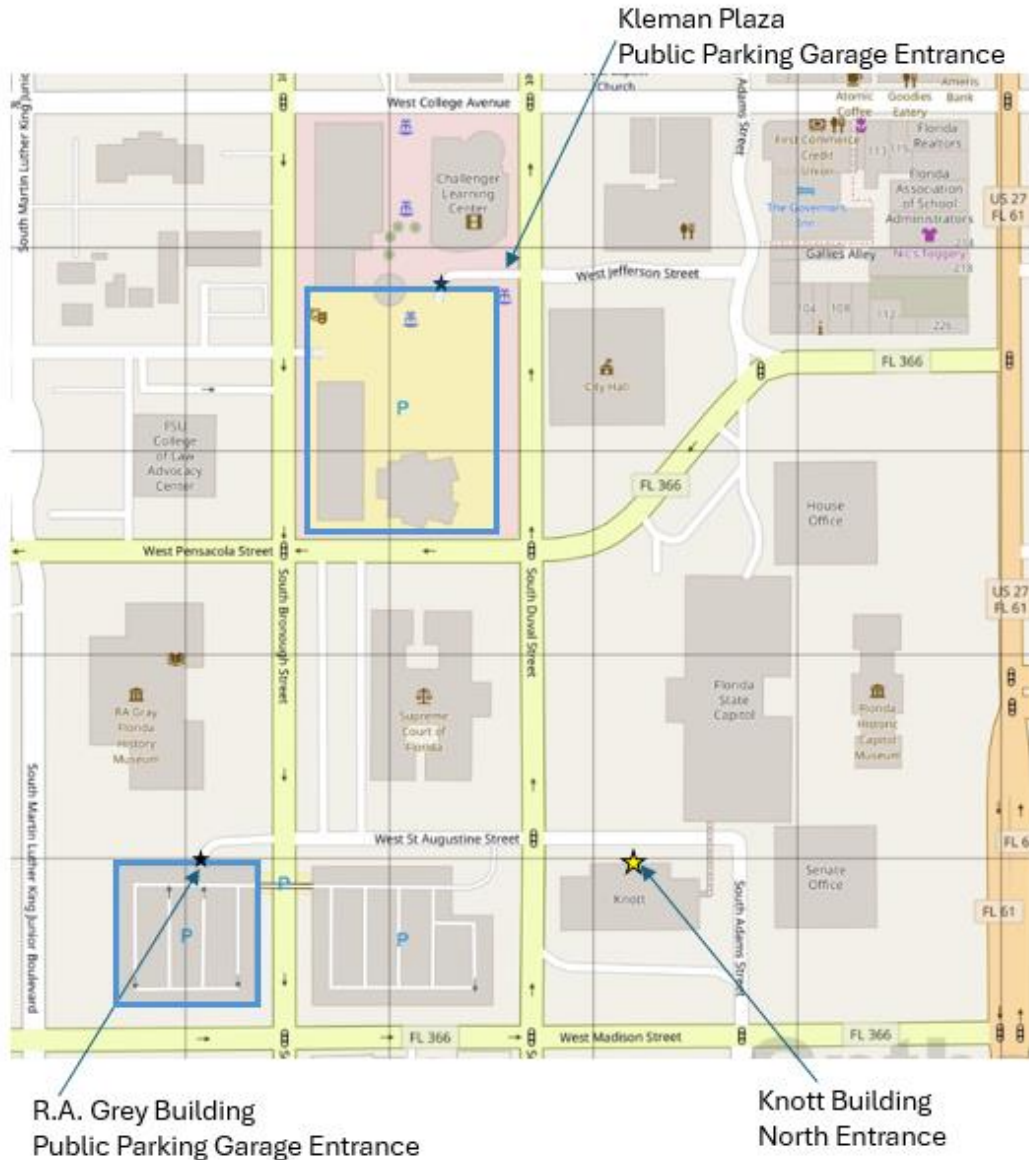
If this is a **probable cause hearing**, the Commission will decide if there is probable cause to believe that the Respondent committed a violation of Florida's election laws. Respondent should be prepared to explain how the staff in its recommendation incorrectly applied the law to the facts of the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

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

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

## Florida Elections Commission Meeting - Augut 13-14, 2024, 412 Knott Building

- Please enter the Knott Building at the North entrance as indicated below.
- Public parking is available at Kleman Plaza (entrance at West Jefferson Sreet/South Duval Street) and the R.A. Grey Building Garage (entrance at West St. Augustine Street/South Bronough Street).



**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**In Re: RSLC - Florida**

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**Case No.: FEC 23-196**

**TO:** RSLC - Florida  
Dee Duncan, Chair  
1201 F Street NW, Suite 6  
Washington, DC 20004

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

**NOTICE OF CANCELLATION OF HEARING (AUTOMATIC FINE (AF))**

You are hereby notified that **the previously scheduled hearing for May 14, 2024, is CANCELLED.** It is anticipated that your case will be scheduled for a new hearing date to be determined as soon as possible.

**A Notice of Hearing will be mailed to you approximately 14 days prior to the new hearing date. You may also wish to monitor our website at <https://www.fec.state.fl.us/> for meeting announcements.**

*Tim Vaccaro*  
Executive Director  
Florida Elections Commission  
May 13, 2024

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**In Re: RSLC - Florida**

**Case No.: FEC 23-196**

**TO:** RSLC - Florida  
Dee Duncan, Chair  
1201 F Street NW, Suite 6  
Washington, DC 20004

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

**NOTICE OF HEARING (AUTOMATIC FINE (AF))**

A hearing will be held in this case before the Florida Elections Commission on, **May 14, 2024 at 9:00 a.m., or as soon thereafter as the parties can be heard**, at the following location: **412 Knott Building, Pat Thomas Committee Room, 404 South Monroe Street, Tallahassee, Florida 32399.**

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

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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  
April 26, 2024

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

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

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**FLORIDA ELECTIONS COMMISSION**  
**CASE REPORT**  
**Case Number: FEC 23-196**

**NAME:** RSLC - FLORIDA

**DATE APPEAL RECEIVED:** 08/01/2023

**DATE REPORT DUE:** 08/12/2022 (2022 P6)

**DATE OF ELECTRONIC RECEIPT:** 08/17/2022

**NUMBER OF DAYS LATE:** 5

**AMOUNT OF FINE:** \$1,150.00

**FINE BASED ON:** (X) NUMBER OF DAYS ( ) 25% OF RECEIPTS ( ) 25% OF EXPENDITURES

**TOTAL RECEIPTS FOR REPORTING PERIOD:** \$301,929.00

**TOTAL EXPENDITURES FOR REPORTING PERIOD:** \$301,929.00

**DATE OF FIRST NOTIFICATION:** 07/07/2023 (Final Fine Notice)

CANDIDATE [ ]	STATE [X]
PC [ ]	DISTRICT [ ]
CCE [ ]	COUNTY [ ]
POLITICAL PARTY [ ]	CITY [ ]
IXO [X]	

**SUMMARY:** RSLC - Florida is an independent expenditure organization (IXO) registered with the State of Florida. The IXO's listed chair is Dee Duncan.

The IXO is appealing the fine. According to Mr. Duncan, they did not receive their credentials until August 17, 2022. He states that they mailed the registration forms via FedEx Priority Overnight on August 4<sup>th</sup> and then called the Division of Elections on August 11<sup>th</sup> to ask when it should be receiving its credentials. He notes that they were contacted by the Division on August 15<sup>th</sup> regarding the IXO registration but did not receive its credentials. They filed the report as soon as they received the credentials on August 17<sup>th</sup>. Mr. Duncan provided emails to and from the Division to support the appeal.

- The 2022 P6 Original Report covers the period from 08/05/22-08/05/22; it was due on 08/12/22.
- The 2022 P6 Queued Transaction Report shows that it was created and filed on 08/17/22.
- RSLC-Florida reported receiving 1 contribution while making 1 expenditure.
- The Division of Elections provided two notes that pertain to RSLC - Florida's 2022 P6 Report. On 08/17/22, DOE staff spoke with Ms. Joanne Parker, the "established contact person" for the IXO, advised her that the IXO was established, and provided credentials to her. They also told her that the "P6 report needs to be filed immediately due to being past due." The notes also reference an additional call from Ms. Parker on the same day.

**PRIOR CASES:** NONE



## REPUBLICAN STATE LEADERSHIP COMMITTEE

REC'D: F ELECTIONS COM  
1 AUG 23 PM 4:00

Dee Duncan  
President  
RSLC – Florida IE PAC  
1201 F Street, NW, Suite 675  
Washington, DC 20004  
[DDuncan@rslc.gop](mailto:DDuncan@rslc.gop)

July 27, 2023

Florida Elections Commission  
107 West Gaines Street, Suite 224  
Tallahassee, Florida 32399-0150

CC: Donna S. Brown  
Chief, Bureau of Election Records  
Division of Election, Florida Department of State  
The R.A. Gray Building, Room 316  
500 South Bronough Street  
Tallahassee, FL 32399-0250  
[ElecRecords@dos.myflorida.com](mailto:ElecRecords@dos.myflorida.com)

Dear Florida Elections Commission:

I write on behalf of RSLC – Florida IE PAC (“RSLC”) to appeal the late fine of \$1,150.00, per the notice sent by the Florida Division of Elections (“Division”), dated July 7, 2023, and received by RSLC on July 17, 2023 (“Notice”). The Notice states that RSLC had a campaign treasurer’s report that was due on August 12, 2022, but was filed on August 17, 2022, and therefore is assessed a late fine of \$1,150.00.

Pursuant to Fla. Stat. 106.07(8)(c), a political committee may appeal or dispute the fine, based upon the “unusual circumstances surrounding the failure to file on the designated due date[.]” Additionally, Fla. Stat. 106.265(2) provides that the Commission shall consider, in determining the amount of civil penalties, the gravity of an act or omission, any previous history of similar acts or omissions, and whether the political committee has shown good faith in attempting to comply.

Here, RSLC, mailed its registration forms to the Division on August 4, 2022, a day prior to when it would have passed the threshold of spending in independent expenditures, knowing that registration was required to be filed and accepted within ten (10) days of passing the threshold and tracking that the expenditures made were within a pre-primary weekly schedule, making the next applicable report due on August 12, 2022. Due to the time sensitivity involved, the registration forms were mailed via FedEx Priority Overnight, with tracking number 777576283217.

FedEx tracking records show that this was delivered on August 5, 2022 at 9:40 AM (See [Exhibit A](#)) and then delivered again on August 8, 2022 at 8:16 AM (See [Exhibit B](#)).





## REPUBLICAN STATE LEADERSHIP COMMITTEE

REC'D: FL ELECTIONS COM  
1 AUG 23 PM 4:00

However, as you are likely aware, campaign finance reports are filed with the Division's Electronic Filing System ("EFS"), which is not accessible until provided log-in credentials by the Division upon registration. When we did not receive credentials by August 11, 2022, RSLC called the Division to ask when it should receive its EFS credentials in order to comply with the reporting schedule.

On August 15, 2022, we received a call from Sheena T. Baker, Regulatory Specialist III, Auditor, in the Division, and then exchanged emails in response to Ms. Baker's questions about RSLC. In those emails, we noted that we passed the spending threshold on August 5, 2022 and requested again for EFS credentials to be provided as soon as possible (See Exhibit C).

On August 17, 2022, the Division sent RSLC a letter, acknowledging receipt of our August 15, 2022 email correspondence in regard to meeting the threshold on August 5, 2022, and the Division finally issued RSLC its necessary EFS credentials (See Exhibit D). The RSLC submitted its campaign finance report the same day.

It is unclear why FedEx "delivered" the registration form on August 5, and "delivered" it again on August 8. Regardless, the RSLC mailed the registration form well in advance of its anticipated August 12 report and the Division received the registration form no later than August 8. The FedEx issues and the Division's delay in providing EFS credentials support that "unusual circumstances" certainly surrounded the RSLC's failure to timely file its report to the Division. Moreover, the RSLC took proactive steps by calling the Division when there was a delay in receiving its EFS credentials. It is evident that the RSLC has shown good faith in attempting to comply with the applicable Florida campaign finance laws and rules. The RSLC does not have a previous history of noncompliance with the Division.

For these reasons, we ask that the Commission find in favor of the RSLC's appeal.

Sincerely,

Dee Duncan  
President



July 27, 2023

## EXHIBIT A

Dear Customer,

The following is the proof-of-delivery for tracking number: 777576283217

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**Delivery Information:**

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<b>Status:</b>	Delivered	<b>Delivered To:</b>	
<b>Signed for by:</b>		<b>Delivery Location:</b>	
<b>Service type:</b>	FedEx Priority Overnight		
<b>Special Handling:</b>	Deliver Weekday		TALLAHASSEE, FL,
		<b>Delivery date:</b>	Aug 5, 2022 09:40

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**Shipping Information:**

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<b>Tracking number:</b>	777576283217	<b>Shp Date:</b>	Aug 4, 2022
		<b>Weight:</b>	
<b>Recipient:</b>		<b>Shipper:</b>	
TALLAHASSEE, FL, US,		WASHINGTON, DC, US,	

Proof-of-delivery details appear below; however, no signature is available for this FedEx Express shipment because a signature was not required.

Thank you for choosing FedEx



July 21, 2023

## EXHIBIT B

Dear Customer,

The following is the proof-of-delivery for tracking number: 777576283217

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**Delivery Information:**

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<b>Status:</b>	Delivered	<b>Delivered To:</b>	
<b>Signed for by:</b>	T.WRIGHT	<b>Delivery Location:</b>	500 S BRONOUGH ST
<b>Service type:</b>	FedEx Priority Overnight		
<b>Special Handling:</b>	Deliver Weekday		TALLAHASSEE, FL, 32399
		<b>Delivery date:</b>	Aug 8, 2022 08:16

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**Shipping Information:**

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<b>Tracking number:</b>	777576283217	<b>Ship Date:</b>	Aug 5, 2022
		<b>Weight:</b>	

**Recipient:**

FloridaDepartmentofState, DivisionofElections  
Room 316, R. A. Gray Building  
500 South Bronough Street  
TALLAHASSEE, FL, US, 32399

**Shipper:**

CabellHobbs, REPUBLICANSTATELEADERSHIPCO  
1201 F Street  
Suite 675  
WASHINGTON, DC, US, 20004

Signature Proof of Delivery is not currently available for this Tracking Number. Availability of signature images may take up to 5 days after delivery date. Please try later, or contact Customer Service at 1.800.Go.FedEx (R) 800.463.3339.

Thank you for choosing FedEx

## EXHIBIT C

Friday, July 21, 2023 at 11:01:16 Eastern Daylight Time

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**Subject:** RE: RSLC Florida IE PAC Registration  
**Date:** Tuesday, August 16, 2022 at 10:41:36 AM Eastern Daylight Time  
**From:** Joanne Parker

Joanne Parker | Partner | RightSide Compliance  
[joanne@rightsidecompliance.com](mailto:joanne@rightsidecompliance.com) / 202-367-8376



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**From:** Joy Lee <jlee@rslc.gop>  
**Sent:** Tuesday, August 16, 2022 9:55 AM  
**To:** Baker, Sheena T. <Sheena.Baker@dos.myflorida.com>  
**Cc:** Tim Beall <Tim@complianceconsultingva.com>; Joanne Parker <Joanne@rightsidecompliance.com>  
**Subject:** Re: RSLC Florida IE PAC Registration

Good morning,

The RSLC – Florida IE PAC will be a PAC that only makes independent expenditures.

Copied here are Tim Beall and Joanne Parker from our compliance team. They are available to answer any additional registration and reporting questions you may have. Thank you for your assistance in getting this Florida IE PAC set up.

Thanks,  
Joy Lee

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**Joy Lee**  
*General Counsel*, Republican State Leadership Committee  
(o) 202-448-5168 | (c) 410-979-0322

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**From:** Baker, Sheena T. <[Sheena.Baker@dos.myflorida.com](mailto:Sheena.Baker@dos.myflorida.com)>  
**Date:** Monday, August 15, 2022 at 6:06 PM  
**To:** Joy Lee <[jlee@rslc.gop](mailto:jlee@rslc.gop)>  
**Subject:** Re: RSLC Florida IE PAC Registration

Good Afternoon Ms. Lee,

I apologize for the late response, I have been out of the office, but the question were as listed below based on the DS-DE 5 (Statement of Organization of Political Committee) submitted:

1. Are you trying to establish a PAC that will ONLY make Independent Expenditures?

- a. If so, you will need to meet the threshold of \$5,000 for support or opposition of issues and/or \$500 for support or opposition of Candidates before you can be established in our system. In both situations, you will need to contact our office once you have met the threshold (we have no way of knowing when that happens without your call) and then we will be able to create the Independent Expenditure PAC in our system at that time. Once that is done, you will receive credentials for the PAC and have to file reports only when funds are spent.

- a. or
- b.

3. Are you trying to establish a PAC that will ALSO make Independent Expenditures?

- a. If so, you will need to resubmit the DS-DE 5 (Statement of Organization of Political Committee) because section #7 and section #8 were not filled out, making the form incomplete.

Respectfully,

***Sheena Turner Baker***

Regulatory Specialist III, Auditor

Department of Election Records

**FLORIDA DEPARTMENT OF STATE**

R.A. Gray Building, Room 316

500 South Bronough Street

Tallahassee, Florida 32399-0250

Phone Number: (850)245-6111

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**From:** Joy Lee <[jlee@rslc.gop](mailto:jlee@rslc.gop)>

**Sent:** Monday, August 15, 2022 10:38 AM

**To:** Baker, Sheena T. <[Sheena.Baker@dos.myflorida.com](mailto:Sheena.Baker@dos.myflorida.com)>

**Subject:** RSLC Florida IE PAC Registration

Good morning, Ms. Baker,

I returned your call to the Republican State Leadership Committee (RSLC) and left you a voicemail message at 850-245-6111. Please give me a call back at 410-979-0322.

Thank you,  
Joy Lee

--  
**Joy Lee**

## EXHIBIT D



# FLORIDA DEPARTMENT of STATE

**RON DESANTIS**  
Governor

**CORD BYRD**  
Secretary of State

August 17, 2022

Dee Duncan, Chairperson  
RSLC - Florida  
1201 F Street NW, Suite 675  
Washington, DC 20004

Dear Mr. Duncan:

This will acknowledge receipt of your email dated August 15, 2022, stating that the RSLC - Florida organization made independent expenditures in excess of \$5,000 as of August 5, 2022. This information was placed on file with our office on August 5, 2022, as the first day of report filing.

Independent expenditure organizations shall file periodic reports of expenditures in the same manner, at the same time, subject to the same penalties, and with the same filing officer as a political committee supporting or opposing such candidate or issue. Please refer to the *Calendar of Reporting Dates* to determine when to file such reports. If you need assistance determining when to file your reports, please contact the Division's help desk at (850) 245-6280.

The reports shall contain the full name and address of each person to whom and for whom each expenditure has been made; the amount, date, and purpose of each expenditure; a description of the services or goods obtained by each expenditure; the issue to which the expenditure relates; and the name and address of, and office sought by, each candidate on whose behalf such expenditure was made. All independent expenditure organizations that file reports with the Division of Elections are required to file by means of the Division's Electronic Filing System (EFS).

### Credentials and Sign-ons

Below is the web address to access the EFS and the organization's user identification number. The enclosed contains the organization's initial password. Once you have logged in using the initial password, you will be immediately prompted to change it to a confidential sign-on.

**EFS Website Address:** <https://efs.dos.state.fl.us>  
**Identification Number:** 83500

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



Dee Duncan, Chairperson  
August 17, 2022  
Page Two

**Timely Filing**

All reports must be completed and filed through the EFS not later than midnight, Eastern Standard Time (EST), of the due date. Reports not filed by midnight, EST, of the due date are late filed and subject to 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 organization failing to file a report on the designated due date is subject to a fine of \$50 per day for the first 3 days late and, thereafter, \$500 per day for each late day, not to exceed 25% of the total expenditures for the period covered by the late report. However, for the reports immediately preceding each primary and general election, the fine shall be \$500 per day for each late day, not to exceed 25% of the total expenditures 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 report filed by means of the EFS is considered to be under oath and is 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 <https://dos.myflorida.com/elections>. It is your responsibility to read, understand, and follow the requirements of Florida's election laws. Therefore, please print a copy of the following documents: Chapter 106, Florida Statutes, *Calendar of Reporting Dates*, and Rule 1S-2.017, Florida Administrative Code.**

Please let me know if you need additional information.

Sincerely,



Donna S. Brown, Chief  
Bureau of Election Records

DSB/stb

Enclosures



# CONFIDENTIAL

## Chairperson Credentials

Once you have logged in using the initial password, you will be immediately prompted to change it to a confidential sign-on. You are responsible for protecting this password from disclosure and for all filings using these credentials, unless the Division is notified that your credentials have been compromised.

Each chairperson is required to provide the Division with confidential personal information that may be used to allow access in the event the password is forgotten or lost. In EFS, access the **Campaign Account** tab and select either **Password** or **PIN Management** to *set recovery questions* for your password and PIN numbers. All passwords and answers to questions are stored as encrypted data and cannot be viewed by the Division staff nor given out over the phone. Please immediately notify the Division if your credentials have been compromised.

## PIN Numbers

Your PIN number is a confidential secure credential that allows you to submit reports and update personal information. Below is your confidential PIN number along with the initial password.

## EFS User's Guide

Once you have logged into your account, an EFS User's Guide can be accessed by clicking on the **Help** tab in the menu items across the top of the page. This is a resource for which you should familiarize yourself.

<b>DEE DUNCAN, Chairperson</b>	<b>IXO</b>
<b>ID number: 83500</b>	<b>83500</b>
<b>Password: A7Q7G5n4</b>	
<b>DEE DUNCAN, Chairperson</b>	<b>IXO</b>
<b>PIN: 2704</b>	<b>83500</b>



FLORIDA DEPARTMENT OF STATE

**Cord Byrd**  
Secretary of State

DIVISION OF ELECTIONS

Final Notice

Delivery Confirmation:

USPS TRACKING # **9114 9022 0078 9884 3170 83**  
& CUSTOMER  
RECEIPT LABEL (ROLL) For Tracking or inquiries go to USPS.com  
or call 1-800-222-1811.

July 7, 2023

Dee Duncan, Chairperson  
RSLC - Florida  
1201 F Street NW, Suite 6  
Washington, DC 20004

IXO 83500

Dear Mr. Duncan:

The campaign treasurer's report that was due on August 12, 2022, was filed on August 17, 2022. By law, you are automatically assessed a late fine of \$1,150.00.

**You have 20 days from the receipt of this notice to either:**

1. Pay the fine to the Florida Division of Elections (For a candidate only, a fine is not an allowable campaign expenditure and must be paid from personal funds) at:

*Florida Division of Elections  
R.A. Gray Building, Room. 316  
500 South Bronough Street  
Tallahassee, Florida 32399-025011*

2. Appeal the fine to the Florida Elections Commission (See Rules 2B-1.005 and 2B-1.0055, Florida Administrative Code) at:

*Florida Elections Commission  
107 West Gaines Street, Ste. 224  
Tallahassee, Florida 32399-0150*

If you appeal, please send a copy also to the Florida Division of Elections so that you will not receive further notices from the Division about this matter.

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

Sincerely,

Donna S. Brown, Chief  
Bureau of Election Records

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

(1) RSLC - Florida (2) 83500  
 Candidate, Committee or Party Name I.D. Number

(3) Post Office Box 772516 Miami FL 33177  
 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 08/05/2022 To 08/05/2022 Report Type: P6

Original  Amendment  Special Election Report

(6) CONTRIBUTIONS THIS REPORT		(7) EXPENDITURES THIS REPORT	
Cash & Checks	\$301,929.00	Monetary Expenditures	\$301,929.00
Loans	\$0.00	Transfers to Office Account	\$0.00
<i>Total Monetary</i>	\$301,929.00	<i>Total Monetary</i>	\$301,929.00
In-Kind	\$0.00	(8) Other Distributions	

Certification

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

<p>I certify that I have examined this report and it is true, correct and complete</p> <p>_____          Name of <input type="checkbox"/> Treasurer <input type="checkbox"/> Deputy Treasurer</p> <p><u>X</u> _____          Signature</p>	<p>I certify that I have examined this report and it is true, correct and complete</p> <p>_____          Name of <input type="checkbox"/> Candidate <input type="checkbox"/> Chairman (PC/PTY Only)</p> <p><u>X</u> _____          Signature</p>
--	--

Name: RSLC - Florida

Report: 2022 P6

Period: 08/05/2022 to 08/05/2022

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

Seq #	Full Name (Last, Suffix, First, Middle)	Contributor	Occupation	Amount
Date	Street Address & City, State, Zip	Type	In-Kind Description	Amend
1	REPUBLICAN STATE LEADERSHIP COMMITTEE	O	N/A	\$301,929.00
08/05/2022	1201 F ST NW, STE. 675 WASHINGTON, DC 20004	CHE		

Name: RSLC - Florida

Report: 2022 P6

Period: 08/05/2022 to 08/05/2022

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

Seq #	Full Name (Last, Suffix, First, Middle)	Type	Purpose	Amount
Date	Street Address & City, State, Zip			Amend
1	MEDIUM BUYING LLC	IEC	RADIO/TV ADVERTISING PRODUCTION AND PLACEMENT; PRO-WILTON SIMPSON, COMMISSIONER OF AGRICULTURE	\$301,929.00
08/05/2022	815 GRANDVIEW AVENUE, SUITE 600 COLUMBUS, OH 43215			

ID:

# CAMPAIGN TREASURER'S REPORT – ITEMIZED FUND TRANSFERS

Name: RSLC - Florida

Report: 2022 P6

Period: 08/05/2022 to 08/05/2022

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

Seq # Date	Full Name (Last, Suffix, First, Middle Street Address & City, State, Zip	Type	Nature of Account	Amount Amend

ID:

# CAMPAIGN TREASURER'S REPORT -- ITEMIZED DISTRIBUTIONS

Name: RSLC - Florida

Report: 2022 P6

Period: 08/05/2022 to 08/05/2022

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

Seq # Date	Full Name (Last, Suffix, First, Middle Street Address & City, State, Zip	Recipient	Purpose	Amount Amend
		Type	Related Expenditure	

**Queued Items for 2022-P6**

Account: 83500

**RSLC - Florida**

Rpt Seq: 1

<i>ProcessDescription</i>	<i>Status</i>	<i>Submitter</i>	<i>Created</i>	<i>LastUpdate</i>
Create Pending Report	Processing Complete	83500	8/17/2022 1:44:59 PM	8/17/2022 1:44:59 PM
Review Pending Report	Processing Complete	83500	8/17/2022 1:53:53 PM	8/17/2022 1:53:53 PM
Review Pending Report	Processing Complete	83500	8/17/2022 2:05:14 PM	8/17/2022 2:05:14 PM
Review Pending Report	Processing Complete	83500	8/17/2022 2:06:13 PM	8/17/2022 2:06:13 PM
Review Pending Report	Processing Complete	83500	8/17/2022 2:07:37 PM	8/17/2022 2:07:37 PM
File Pending Report	Processing Complete	83500	8/17/2022 3:52:34 PM	8/17/2022 3:52:34 PM



**HISTORY NOTES**  
RSLC - Florida - 83500

<b>Unique ID</b>	<b>Date Recorded</b>	<b>Last Edited Date</b>	<b>Originally Recorded By</b>
77643	8/17/2022 1:02:00 PM		stbaker
RE: Secondary Phone Number			
Received a call from Ms. Joanne Parker and she left a contact number for herself: 202-367-8376.			
77642	8/17/2022 12:59:00 PM		stbaker
RE: Credentials and Reporting			
Called and spoke to Ms. Joanne Parker, established contact person for this IXO. I advised her that the IXO has been established based on the date stated in their email as the date the threshold was met. I let her know that the 2022 P6 report needs to be filed immediately due to being past due and that the 2022 P7 report is due on the 19th. She stated she was aware and knew that would be the case. Per Management and based on the corresponding emails regarding the account, credentials were given and I was advised the the 2022 P6 report will be filed today.			

**RE: RSLC Florida IE PAC Registration**

Joanne Parker &lt;Joanne@rightsidecompliance.com&gt;

Tue 8/16/2022 10:41 AM

To: Joy Lee &lt;jlee@rslc.gop&gt;; Baker, Sheena T. &lt;Sheena.Baker@dos.myflorida.com&gt;

Cc: Tim Beall &lt;Tim@complianceconsultingva.com&gt;

EMAIL RECEIVED FROM EXTERNAL SOURCE

Sheena-

Thank you for your help. Regarding your point #1 below, the RSLC Florida IE PAC met the threshold on 8/5/22 so please proceed with getting us a reporting login as soon as possible. Let me know if you need anything else in order to do so, thanks!

*Joanne Parker | Partner | RightSide Compliance*  
*[joanne@rightsidecompliance.com](mailto:joanne@rightsidecompliance.com) / 202-367-8376*



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**From:** Joy Lee <jlee@rslc.gop>**Sent:** Tuesday, August 16, 2022 9:55 AM**To:** Baker, Sheena T. <Sheena.Baker@dos.myflorida.com>**Cc:** Tim Beall <Tim@complianceconsultingva.com>; Joanne Parker <Joanne@rightsidecompliance.com>**Subject:** Re: RSLC Florida IE PAC Registration

Good morning,

The RSLC – Florida IE PAC will be a PAC that only makes independent expenditures.

Copied here are Tim Beall and Joanne Parker from our compliance team. They are available to answer any additional registration and reporting questions you may have. Thank you for your assistance in getting this Florida IE PAC set up.

Thanks,  
Joy Lee

--

**Joy Lee***General Counsel, Republican State Leadership Committee**(o) 202-448-5168 | (c) 410-979-0322*

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**From:** Baker, Sheena T. <Sheena.Baker@dos.myflorida.com>**Date:** Monday, August 15, 2022 at 6:06 PM**To:** Joy Lee <jlee@rslc.gop>**Subject:** Re: RSLC Florida IE PAC Registration

Good Afternoon Ms. Lee,



## FLORIDA DEPARTMENT of STATE

**RON DESANTIS**  
Governor

**CORD BYRD**  
Secretary of State

August 17, 2022

Dee Duncan, Chairperson  
RSLC - Florida  
1201 F Street NW, Suite 675  
Washington, DC 20004

Dear Mr. Duncan:

This will acknowledge receipt of your email dated August 15, 2022, stating that the RSLC - Florida organization made independent expenditures in excess of \$5,000 as of August 5, 2022. This information was placed on file with our office on August 5, 2022, as the first day of report filing.

Independent expenditure organizations shall file periodic reports of expenditures in the same manner, at the same time, subject to the same penalties, and with the same filing officer as a political committee supporting or opposing such candidate or issue. Please refer to the *Calendar of Reporting Dates* to determine when to file such reports. If you need assistance determining when to file your reports, please contact the Division's help desk at (850) 245-6280.

The reports shall contain the full name and address of each person to whom and for whom each expenditure has been made; the amount, date, and purpose of each expenditure; a description of the services or goods obtained by each expenditure; the issue to which the expenditure relates; and the name and address of, and office sought by, each candidate on whose behalf such expenditure was made. All independent expenditure organizations that file reports with the Division of Elections are required to file by means of the Division's Electronic Filing System (EFS).

### **Credentials and Sign-ons**

Below is the web address to access the EFS and the organization's user identification number. The enclosed contains the organization's initial password. Once you have logged in using the initial password, you will be immediately prompted to change it to a confidential sign-on.

**EFS Website Address:** <https://efs.dos.state.fl.us>  
**Identification Number:** 83500

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



Dee Duncan, Chairperson  
August 17, 2022  
Page Two

### **Timely Filing**

All reports must be completed and filed through the EFS not later than midnight, Eastern Standard Time (EST), of the due date. Reports not filed by midnight, EST, of the due date are late filed and subject to 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 organization failing to file a report on the designated due date is subject to a fine of \$50 per day for the first 3 days late and, thereafter, \$500 per day for each late day, not to exceed 25% of the total expenditures for the period covered by the late report. However, for the reports immediately preceding each primary and general election, the fine shall be \$500 per day for each late day, not to exceed 25% of the total expenditures 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 report filed by means of the EFS is considered to be under oath and is 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 <https://dos.myflorida.com/elections>. It is your responsibility to read, understand, and follow the requirements of Florida's election laws. Therefore, please print a copy of the following documents: Chapter 106, Florida Statutes, *Calendar of Reporting Dates*, and Rule 1S-2.017, Florida Administrative Code.**

Please let me know if you need additional information.

Sincerely,



Donna S. Brown, Chief  
Bureau of Election Records

DSB/stb

Enclosures

RECEIVED

2022 AUG -8 AM 9:13

DIVISION OF ELECTIONS  
TALLAHASSEE, FL

**APPOINTMENT OF CAMPAIGN TREASURER  
AND DESIGNATION OF CAMPAIGN  
DEPOSITORY FOR  
POLITICAL COMMITTEES**  
(Sections 106.011(2) and 106.021(1), F.S.)

**CHECK APPROPRIATE BOX:**

Initial Filing for:  Primary Treasurer  Deputy Treasurer

OFFICE USE ONLY

Re-filing to Change:  Primary Treasurer  Deputy Treasurer  Primary/Secondary Depository

1. Committee  
RSLC - Florida IE PAC

2. Telephone  
(202 ) 448-5160

3. Name of Treasurer or Deputy Treasurer  
Cabell Hobbs

4. Email (optional)  
compliance@rslc.gop

5. Telephone (optional)  
(202 ) 448-5160

6. Mailing Address  
PO Box 772516, Miami, FL 33177

7. Street Address  
1201 F Street NW, Ste. 675, Washington DC 20004

8. The following bank has been designated as the  Primary Depository  Secondary Depository

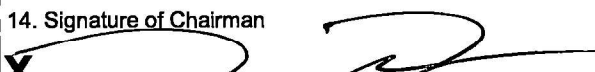
9. Name of Bank  
EagleBank

10. Street Address  
2001 K Street, NW

11. City  
Washington

12. State  
DC

13. Zip Code  
20004

14. Signature of Chairman  


15. Name of Chairman (Print or Type)  
Dee Duncan

**Campaign Treasurer's Acceptance of Appointment**

I, Cabell Hobbs, do hereby accept the appointment as  
(Please Print or Type)  
treasurer or deputy treasurer for RSLC - Florida IE PAC  
(Committee)

**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.**

8/3/22 Date   Signature of Campaign Treasurer or Deputy Treasurer

**STATEMENT OF ORGANIZATION  
OF POLITICAL COMMITTEE**

(PLEASE TYPE)

OFFICE USE ONLY  
**RECEIVED**

2022 AUG -8 AM 9:13

DIVISION OF ELECTIONS  
TALLAHASSEE, FL

**1. Full Name of Committee**

RSLC - Florida IE PAC

**Telephone**

202-448-5160

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

PO Box 772516, Miami, FL 33177

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

1201 F Street NW, Ste. 675, Washington DC 20004

**2. Affiliated or Connected Organizations (includes other committees of continuous existence and political committees)**

Name of Affiliated or Connected Organization	Mailing Address	Relationship
Republican State Leadership Committee	1201 F Street NW, Ste. 675, Washington DC 20004	Affiliated

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

Political committee supporting or opposing statewide, legislative, multicounty candidates and/or issues.

**4. Nature of Organization or Organization's Special Interest (e.g., medical, legal, education, etc.)**

Make independent expenditures in the State of Florida.

**5. Identify by Name, Address and Position, the Custodian of Books and Accounts (include treasurer's name)**

Full Name	Mailing Address	Committee Title or Position
Cabell Hobbs	1201 F Street NW, Ste. 675, Washington DC 20004	Treasurer/Custodian of Books

**6. List by Name, Address and Position, Other Principal Officers, Including Officers and Members of the Finance Committee, If Any (include chairman's name)**

Full Name	Mailing Address	Committee Title or Position
Dee Duncan	1201 F Street NW, Ste. 675, Washington DC 20004	Chairman

**7. List by Name, Address, Office Sought and Party Affiliation Each Candidate or Other Individual that this Committee is Supporting (if none, please indicate)**

Full Name	Mailing Address	Office Sought	Party
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

**8. List Any Issues this Committee is Supporting:** [REDACTED]  
**List Any Issues this Committee is Opposing:** [REDACTED]

**9. If this Committee is Supporting the Entire Ticket of a Party, Give Name of Party**  
 Republican

**10. In the Event of Dissolution, What Disposition will be Made of Residual Funds?**  
 Residual funds will be returned to the Republican State Leadership Committee.

**11. List all Banks, Safety Deposit Boxes, or Other Depositories Used for Committee Funds**

Name of Bank or Depository & Account Number	Mailing Address
EagleBank Account Number [REDACTED]	2001 K Street, NW, Washington DC 20006

**12. List all Reports Required to be Filed by this Committee with Federal Officials and the Names, Addresses and Positions of Such Officials, If Any**

Report Title	Dates Required to be Filed	Name & Position of Official	Mailing Address

STATE OF N/A District of Columbia COUNTY

I, Dee Duncan, certify that the information in this Statement of Organization is complete, true and correct.

**X** [Signature]  
 Signature of Chairman of Political Committee

8/3/22  
 Date