



FLORIDA DEPARTMENT OF STATE

Ken Detzner
Secretary of State

DIVISION OF ELECTIONS

November 2, 2015

Noreen A. Fenner, Treasurer for
Economic Freedom Foundation
8489 Cabin Hill Road
Tallahassee, FL 32311

Re: PAC 60915

Dear Ms. Fenner:

The Division of Elections has determined that one or more campaign reports are incomplete for the reasons noted in the attached error report.

Pursuant to Section 106.07(2), Florida Statutes, you have 7 days from receipt of this notice to file an amended report to correct errors or provide missing information. If the information has been reported accurately, provide a written explanation to the Division addressing the issue noted in the error report. Please be advised that failure to supply this information within the time allowed may constitute a violation of Chapter 106, Florida Statutes.

If you need assistance in filing an amendment, please contact the Division's help line at (850) 245-6280.

Sincerely,

Kristi Reid Bronson
Chief, Bureau of Election Records

Attachment

cc: Matt Gaetz, Chairperson

Compliance Report

Committee: Economic Freedom Foundation

Type: PAC - BOT

Report: 2015 M3 (41) Covering Period: 3/1/15 - 3/31/15

Account: 60915

Overall

Contributions

			Contribution					
<u>Statute</u>	<u>FAC</u>	<u>Description</u>	<u>Seq</u>	<u>Date</u>	<u>Name</u>	<u>City</u>	<u>Type</u>	<u>Amount</u>
1S-2.017 F		Occupation/business not specific	9	3/2/2015	WEAVER J WAYNE		CHE	\$1,000.00
1S-2.017 F		Occupation/business not specific	11	3/2/2015	BAKER II JOHN D		CHE	\$1,000.00

Expenditures

Fund Transfers

Other Distributions

Report: 2015 M8 (46) Covering Period: 8/1/15 - 8/31/15

Account: 60915

Overall

Contributions

Expenditures

			Expenditure					
<u>Statute</u>	<u>FAC</u>	<u>Description</u>	<u>Seq</u>	<u>Date</u>	<u>Name</u>	<u>City</u>	<u>Type</u>	<u>Amount</u>
106		Invalid expenditure - written explanation required	2	8/12/2015	NORTH FLORIDA NEIGHBORS		MON	\$10,000.00

Fund Transfers

Other Distributions

Expenditure Purposes

Account: **60915 Economic Freedom Foundation**

Election: **20161108-GEN**

<u>Expenditure Purpose</u>	<u>Type</u>	<u>Expenditure To</u>	<u>Date</u>	<u>Amount</u>	<u>Report</u>	<u>Seq</u>	<u>Line</u>
ACCOUNT SERVICES AND POSTAGE	MON	CARROLL AND COMPANY, CPAS	5/7/2015	\$366.08	2015 - M5	43	1
ACCOUNTING SERVICES	MON	CARROLL AND COMPANY, CPAS	3/23/2015	\$450.00	2015 - M3	41	3
ACCOUNTING SERVICES	MON	CARROLL AND COMPANY, CPAS	1/29/2015	\$260.00	2015 - M1	39	3
ACCOUNTING SERVICES	MON	CARROLL AND COMPANY, CPAS	2/20/2015	\$595.00	2015 - M2	40	4
ACCOUNTING SERVICES	MON	CARROLL AND COMPANY, CPAS	6/8/2015	\$275.00	2015 - M6	44	1
ACCOUNTING SERVICES	MON	CARROLL AND COMPANY, CPAS	7/16/2015	\$595.00	2015 - M7	45	1
CONTRIBUTION	MON	NORTH FLORIDA NEIGHBORS	8/12/2015	\$10,000.00	2015 - M8	46	2
FORT WALTON BEACH CITY COUNCIL SEAT 1	CAN	SCOTT SMITH CAMPAIGN	1/27/2015	\$250.00	2015 - M1	39	2
FORT WALTON BEACH CITY COUNCIL SEAT 2	CAN	DIANE KELLER CAMPAIGN	1/27/2015	\$250.00	2015 - M1	39	1
HOUSE DISTRICT 30	CAN	BOB CORTES CAMPAIGN	5/7/2015	\$500.00	2015 - M5	43	2
HOUSE DISTRICT 60	CAN	DANA D. YOUNG CAMPAIGN	2/2/2015	\$1,000.00	2015 - M2	40	1
LEGAL FEES	MON	COATES LAW FIRM, PL	8/21/2015	\$75.00	2015 - M8	46	3
LEGAL SERVICES	MON	COATES LAW FIRM, PL	3/10/2015	\$787.50	2015 - M3	41	2
NASSAU CO. SCHOOL SUPERINTENDENT	CAN	JANET ADKINS CAMPAIGN	8/26/2015	\$500.00	2015 - M8	46	4
PAC CONTRIBUTION	MON	TREASURE COAST ALLIANCE	5/29/2015	\$50,000.00	2015 - M5	43	4
PC CONTRIBUTION	MON	FREE ENTERPRISE FUND	2/17/2015	\$1,000.00	2015 - M2	40	3
POLITICAL CONSULTING	MON	REDFISH CONSULTING	5/21/2015	\$2,500.00	2015 - M5	43	3
SURVEY	MON	VICIDIAL GROUP	3/6/2015	\$700.00	2015 - M3	41	1
TRAVEL	RMB	GAETZ MATT	4/14/2015	\$1,807.00	2015 - M4	42	1
TREASURER SERVICES	MON	PAC FINANCIAL MANAGEMENT	9/10/2015	\$523.50	2015 - M9	47	1
WEBSITE DOMAIN RENEWAL	MON	TAPROOT CREATIVE GROUP, LLC	8/11/2015	\$10.16	2015 - M8	46	1
WEBSITE SERVICES	MON	TAPROOT CREATIVE GROUP, LLC	2/12/2015	\$250.00	2015 - M2	40	2



16. May a Florida political committee make contributions to an out-of-state political entity, a federal political action committee (PAC), a candidate for federal office, or a person seeking selection as the chair of a political party?

No. A Florida political committee must use its funds solely for Florida political activities, *i.e.*, depositing contributions and making expenditures, which by definition in Florida law, are for the purpose of influencing only Florida elections. Florida law defines “election” as one held in Florida for the purpose of nominating or electing candidates to “public office,” which definition is further limited to state, county, municipal, or school or other district offices or positions that are filled by the vote of the electors. A contribution to an out-of-state political entity, to a federal PAC, to a candidate for federal office (even one running for a federal office from Florida), or to a person seeking selection as the chair of a political party does not fall within the applicable definitions of “election” or “public office.” This also means that funds in the Florida political committee’s bank account may not be used for the purpose of influencing elections outside of Florida, such as giving funds to candidates in other states or donating funds to an out-of-state political entity or federal PAC.

(Sections 106.011(5), (7), (16), & (17),
106.03, 106.05, 106.07, 106.11, F.S.)

17. What are the consequences of an out-of-state political entity or a federal political action committee (PAC) contributing to a Florida political committee?

Depending upon the circumstances of how the out-of-state entity, federal PAC, or another state’s PAC collects its donations and makes expenditures in Florida, one of two different scenarios could result.

First, an out-of-state political entity or federal PAC, like any other contributor, can give unlimited contributions to one or more Florida political committees, if the out-of-state political entity or federal PAC is not itself receiving “contributions.” “Contributions” are defined as only those made for the purpose of influencing the results of a Florida election. An out-of-state political entity or federal PAC that has only received donations that were *not* made for the purpose of influencing the results of Florida elections has not received contributions under Florida law; therefore, it can make contributions to a Florida political committee without having to register as a Florida political committee.

On the other hand, if an out-of-state political entity or federal PAC receives “contributions” as defined above (donations made for the purpose of influencing the results of a Florida election), the out-of-state political entity or federal PAC must register as a Florida political committee. A Florida political committee must maintain a separate bank account solely for Florida political activities (*i.e.*, depositing contributions and making expenditures, which