



BENJAMIN J. GIBSON
PARTNER
Shutts & Bowen LLP
215 South Monroe Street
Suite 804
Tallahassee, Florida 32301
DIRECT (850) 241-1723
FAX (850) 241-1718
EMAIL BGibson@shutts.com

Digitally signed
by Christal
Dennis
Date:
2019.04.23
13:23:47 -04'00'

April 22, 2019

SENT VIA EMAIL (CELA@FEC.GOV)

Jeff Jordan, Esq.
Assistant General Counsel
Complaints Examination & Legal Administration
Office of the General Counsel
Federal Election Commission
1050 First Street NE
Washington, DC 20463

Re: Respondents' Supplemental Information to MUR 7561 Response

Dear Mr. Jordan:

MUR 7561 Respondents, Ron DeSantis for Governor Campaign, Friends of Ron DeSantis PAC, and Treasurer, Nancy Watkins, hereby provide the attached supplemental information to its Response previously submitted on February 25, 2019.

MUR 7561 was filed by Complainant, Joseph Weinzettle, alleging that Respondents violated 52 U.S.C. § 30121 by accepting contributions from foreign nationals and foreign organizations. The named Respondents above jointly filed a Response and wish to supplement that Response with the attached letters from the Florida Elections Commission dismissing and finding "Legally Insufficient" a state elections complaint also filed by Joseph Weinzettle containing similar allegations to those in MUR 7561.

Joseph Weinzettle's original complaint filed with the Florida Elections Commission, styled FEC 19-010, made multiple allegations against the Republican Party of Florida, including that the state party worked in concert with Respondents to MUR 7561 and "provided voter data from [a] survey to foreign nationals so they could suppress those likely to vote Democrat through their use of Twitter, and also accepted excessive contributions from foreign nationals." The Florida Elections Commission found Mr. Weinzettle's original complaint to be "Legally Uninsufficient" and gave him an opportunity to amend, which he did.

Mr. Weinzettle's amended complaint made additional allegations and repeated the same allegations against the Republican Party of Florida, including once again that the state party worked with Respondents to MUR 7561 to commit violations including, "accepting foreign contributions, engaging in social media interaction with foreign nationals and organizations, and

Jeff Jordan, Esq.
April 22, 2019
Page 2

using foreign content in campaign messaging.” On April 10, 2019, the Florida Elections Commission dismissed Mr. Weinzettle’s complaint, as amended, finding that “Complainant’s allegations appear to be based on hearsay and conjecture. Complainant’s allegations in his amended complaint do not cure the original complaint. Complainant has provided no evidence to support his allegations. This case is now closed.” Mr. Weinzettle has displayed a pattern of making frivolous allegations at the state and federal level against Respondents and other related entities.

In supplement to the above named Respondents’ Response to MUR 7561, please find enclosed: 1) February 11, 2019, letter from Tim Vacarro, Executive Director of the Florida Elections Commission finding Joseph Weinzettle’s original FEC 19-010 complaint “Legally Insufficient”; and 2) April 10, 2019, letter from Tim Vacarro, Executive Director of the Florida Elections Commission dismissing Mr. Weinzettle’s amended FEC 19-010 complaint.

The Commission should find no reason to believe that Respondents violated the Act or Commission regulations and dismiss MUR 7561.

Sincerely,



Benjamin J. Gibson, Esq.
*Counsel for Respondents, Ron DeSantis for
Governor Campaign, Friends of Ron DeSantis
PAC, and Treasurer, Nancy Watkins*

**FLORIDA ELECTIONS COMMISSION****107 W. Gaines Street****Collins Building, Suite 224****Tallahassee, Florida 32399-1050****Telephone: (850) 922-4539****www.fec.state.fl.us; fec@myfloridalegal.com**

February 11, 2019

Joseph Weinzettle
P.O. Box 282
Tarpon Springs, FL 34688

RE: Case No.: FEC 19-010; Respondent: Republican Party of Florida

Dear Mr. Weinzettle:

The Florida Elections Commission has received your complaint alleging violations of Florida's election laws.

Complainant alleged that Respondent attempted to corruptly influence electors, attempted to coerce electors not to vote for the candidate of their choice, failed to report contributions and expenditures, and accepted excessive contributions from foreign nationals.

Complainant provided a copy of a letter titled "Sunshine State Opinion Survey", signed by A. Edward Wright, requesting that Complainant complete a nonpartisan survey by September 4, 2018. The letter states that if Complainant completes follow-up surveys he will receive a \$5 gift card. The letter states that it is a project of Sequoia Research, LLC. Complainant alleged that the survey was targeted to Jewish electors in order to data mine their personal information for Ron DeSantis' 2018 campaign for Governor for the purpose of suppressing the Jewish vote.

Complainant alleged that Respondent is associated with the survey based on Respondent's expenditure to a printer in Jacksonville on July 24, 2018 for direct mail services among other expenditures around the same time by or to Ron DeSantis, Bradley C. Herold, Brent Seaborn, and Friends of Ron DeSantis. Complainant alleged that Respondent failed to report an expenditure for the survey or disclose their involvement.

Complainant alleged that Respondent used a political consultant, Elnatan Rudolph, to target Jewish electors with text messages and emails in order to suppress their vote. He bases his allegations on newspaper articles. Complainant alleged Respondent provided voter data from the survey to foreign nationals so they could suppress those likely to vote Democrat through their use of Twitter, and also accepted excessive contributions from foreign nationals. Complainant provided what may be a copy/paste of tweets and newspaper articles.

Respondent stated that it is not affiliated with the Sunshine State Opinion Survey nor did it expend funds for the survey. Respondent stated that the complaint is false on its face and not based on personal information.

The identity of the responsible party for the letter is unknown, as the address is that of a private postal company, and Sequoia Research, LLC is not registered with the Florida Secretary of State. However, it does not appear that Respondent has any connection to the survey letter. Further, Complainant's allegations appear to be based on newspaper articles (hearsay) and conjecture. Complainant has provided no evidence that Respondent attempted to corruptly influence electors, attempted to coerce electors not to vote for the candidate of their choice, failed to report contributions and expenditures, or accepted excessive contributions from foreign nationals.

For these reasons, I find the complaint to be Legally Insufficient.

If you have additional information to correct the stated ground(s) of insufficiency, please submit it within 14 days of the date of this letter. If we do not receive additional information that corrects the stated grounds of insufficiency, this case will be closed. For your convenience, enclosed is a form for your use in submitting additional information. If you submit an additional statement containing facts, you must sign the statement and have your signature notarized. In addition, any additional facts you submit to the Commission must be based on either personal information or information other than hearsay.

Until this case is closed, section 106.25(7), Florida Statutes, provides that the Respondent may not disclose this letter, the complaint, or any document related to this case, unless he or she waives confidentiality in writing. To waive confidentiality, the Respondent must mail or fax a written waiver of confidentiality to Donna Ann Malphurs at the address or fax number listed above.

If you have any questions concerning the complaint, please contact us at fec@myfloridalegal.com.

Sincerely,



Tim Vaccaro
Executive Director

TV/enr

Enclosure: Additional Information Form

cc: Benjamin J. Gibson., Attorney for Respondent w/out Enclosure



FLORIDA ELECTIONS COMMISSION

**107 W. Gaines Street
Collins Building, Suite 224
Tallahassee, Florida 32399-1050
Telephone: (850) 922-4539**

www.fec.state.fl.us; fec@myfloridalegal.com

April 10, 2019

Joseph Weinzettle
P.O. Box 282
Tarpon Springs, FL 34688

RE: Case No.: FEC 19-010; Respondent: Republican Party of Florida

Dear Mr. Weinzettle:

The Florida Elections Commission has received your amended complaint, including any additional information you provided, alleging violations of Florida's election laws. I have reviewed your amended complaint and still find it to be legally insufficient.

The initial complaint essentially alleged that Respondent attempted to corruptly influence electors, attempted to coerce electors not to vote for the candidate of their choice, failed to report contributions and expenditures, and accepted excessive contributions from foreign nationals.

Complainant's original complaint was found legally insufficient as Respondent did not appear to have any connection to the survey letter at issue, as Complainant's allegations appear to be based on newspaper articles (hearsay) and conjecture, and as Complainant provided no evidence that Respondent violated the sections of law alleged by Complainant.

In his amended complaint, Complainant alleges that the Florida Election Code does not prohibit regulation of new technologies used by campaigns, that Respondent did not explain its failure to report in-kind contributions from and expenditures to foreign nationals and organizations, and that Respondent failed to deny the following actions: targeting certain groups with voter suppression messaging, accepting foreign contributions, engaging in social media interaction with foreign nationals and organizations, and using foreign content in campaign messaging.

Respondent stated that the complaint is not based upon personal information and specifically denied all allegations contained within the complaint.

Joseph Weinzettle

April 10, 2019

Page 2

FEC 19-010

The identity of the responsible party for the survey letter is unknown, as the address is that of a private postal company and Sequoia Research, LLC is not registered with the Florida Secretary of State. However, it does not appear that Respondent has any connection to the survey letter. Further, Complainant's allegations appear to be based on hearsay and conjecture. Complainant's allegations in his amended complaint do not cure the original complaint. Complainant has provided no evidence to support his allegations.

This case is now closed. If you have any questions, please contact us at fec@myfloridalegal.com.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tim Vaccaro", with a long horizontal flourish extending to the right.

Tim Vaccaro
Executive Director

TV/med

cc: Benjamin J. Gibson, Attorney for Respondent