

George Thurlow

Gulfport, FL 33707

July 28, 2020

MUR 7766

Office of General Counsel
Federal Election Commission
1050 First Street, NE
Washington, DC 20463

To Whom It May Concern:

I wish to file a complaint against the following political committee and its officers:

Florida Country, *a registered political committee in the State of Florida*
Wendi Leach, Chair of Florida Country
Eric Robinson, Treasurer of Florida Country
133 Harbor Drive South
Venice, FL 34285

I am filing this complaint based on information I learned from public campaign finance reports. On April 21, 2020, Florida Country, the aforementioned political committee, accepted a contribution of \$2,500 from Queensgate Homes Inc., a corporation that appears to be domiciled in Canada (the reported address of Queensgate Homes Inc. is 400-3800 Steeles Ave. W., Woodbridge, Ontario, Canada). Despite this contribution being made to a state-level political committee, I believe it to be a violation of 52 USC § 30121 which prohibits foreign nationals in connection with a state or local election. Contributions to a state-level political committee are implicitly made in connection with state and local elections. Florida Country's attempts to participate in state and local elections is further evidenced by its spending \$24,215.97 on direct mail between June 30th and July 28th—all when vote by mail ballots for Florida's August 18th primary were mailed in Sarasota County, the base of this political committee, starting on July 2nd.

I have attached copies of Florida Country's organizational documents and copies of the aforementioned campaign finance reports to this Complaint.

If there are any additional questions regarding this complaint, I can be reached at the contact information above.

Sincerely,



George Thurlow

OATH

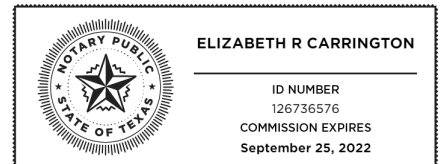
STATE OF Texas
COUNTY OF Montgomery

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

George Albert Doyle Thurlow

Original Signature of Person Bringing Complaint

Sworn to and subscribed before me this 28 day of
July, 20 20



Notarized online using audio-video communication

Elizabeth R Carrington

Signature of Officer Authorized to Administer Oaths or Notary Public

ELIZABETH R CARRINGTON Electronic Notary Public
(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known _____ Or Produced Identification ✓
Type of Identification Produced Drivers License

EXHIBITS:

- (1) Statement of Organization for Florida Country
- (2) Appointment of Campaign Treasurer for Florida Country
- (3) Report of Florida Country's Contributions
- (4) Report of Florida Country's Expenditures
- (5) 52 USC § 30121

STATEMENT OF ORGANIZATION OF POLITICAL COMMITTEE

(PLEASE TYPE)

OFFICE USE ONLY
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2020 FEB 14 AM 11:50
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1. Full Name of Committee

FLORIDA COUNTRY

Telephone

941-200-6551

Mailing Address (include city, state and zip code)

133 HARBOR DR S
VENICE, FL 34285

Street Address (include city, state and zip code)

133 HARBOR DR S
VENICE, FL 34285**2. Affiliated or Connected Organizations (includes other committees of continuous existence and political committees)**

Name of Affiliated or Connected Organization	Mailing Address	Relationship
N/A		

3. Area, Scope and Jurisdiction of the Committee

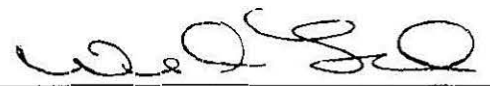
To support or oppose candidates for statewide, multi-county, legislative or local office and other activities not prohibited by Chapter 106 Florida Statute.

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

POLITICAL

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
ERIC ROBINSON	133 HARBOR DR S VENICE, FL 34285	TREASURER

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	
WENDI LEACH	133 HARBOR DR S VENICE, FL 34285	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
TO BE DETERMINED			
8. List Any Issues this Committee is Supporting: TO BE DETERMINED List Any Issues this Committee is Opposing: TO BE DETERMINED			
9. If this Committee is Supporting the Entire Ticket of a Party, Give Name of Party N/A			
10. In the Event of Dissolution, What Disposition will be Made of Residual Funds? Contribute to Candidates, Political Parties, Political Committees			
11. List all Banks, Safety Deposit Boxes, or Other Depositories Used for Committee Funds			
Name of Bank or Depository & Account Number		Mailing Address	
SUNTRUST BANK		1670 South Venice Bypass VENICE, FL 34293	
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
FORM 8871 FORM 1120POL FORM 990 AS MAY BE REQUIRED	UPON FORMATION MAR 15-ANNUALLY MAY 15-ANNUALLY	INTERNAL REVENUE SERVICE	OGDEN UT 84201
STATE OF <u>FLORIDA</u>		<u>SARASOTA</u> COUNTY	
I, <u>WENDI LEACH</u> , certify that the information in this Statement of Organization is complete, true and correct.			
X  Signature of Chairman of Political Committee		<u>2-11-2020</u> Date	

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

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CHECK APPROPRIATE BOX:

OFFICE USE ONLY

☒ Original Appointment of Treasurer ☐ Reappointment of Treasurer ☐ Deputy Treasurer

1. Committee or Organization

FLORIDA COUNTRY

2. Telephone

(941) 200-6551

3. Name of Treasurer or Deputy Treasurer

ERIC ROBINSON

4. Email (optional)

5. Telephone (optional)

(941) 200-6551

6. Mailing Address

133 HARBOR DR S VENICE, FL 34285

7. Street Address

133 HARBOR DR S VENICE, FL 34285

8. The following bank has been designated as the



Primary Depository



Secondary Depository

9. Name of Bank

SUNTRUST

10. Street Address

1670 South Venice Bypass

11. City

VENICE

12. State

FL

13. Zip Code

34293

14. Signature of Chairman

X 

15. Name of Chairman (Print or Type)

WENDI LEACH

Campaign Treasurer's Acceptance of Appointment


I, ERIC ROBINSON, do hereby accept the appointment as
(Please Print or Type)

treasurer or deputy treasurer for

FLORIDA COUNTRY

(Committee or Organization)

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

 2/12/2020
Date

X


Signature of Campaign Treasurer or Deputy Treasurer



Florida Department of State
Division of Elections

Campaign Contributions

Florida Country

[About the Campaign Finance Data Base](#)

Rpt Yr	Rpt Type	Date	Amount	Contributor Name	Address	City State Zip	Occupation	Typ InKind Desc
2020	M3	03/04/2020	5,000.00	GABBERT INVESTMENT GROUP LLC	1250 HIDDEN HARBOR WAY	SARASOTA, FL 34242	FINANCE SERVICES	CHE
2020	M3	03/06/2020	5,000.00	MEDRED ROBERT	5972 RIVER FOREST CIR	BRADENTON, FL 34203	REAL ESTATE	CHE
2020	M3	03/10/2020	5,000.00	SABA WILLIAM	240 S PINEAPPLE AVE STE 702	SARASOTA, FL 34236	ATTORNEY	CHE
2020	M3	03/13/2020	5,000.00	MERRILL WILLIAM	1408 WESTBROOK DR	SARASOTA, FL 34231	ATTORNEY	CHE
2020	M3	03/13/2020	500.00	MIDCO PETROLEUM COMPANY	2212 6TH ST	SARASOTA, FL 34237	PETROLEUM COMPANY	CHE
2020	M3	03/17/2020	1,600.00	MATTAMY HOMES	19503 S WEST VILLAGES PKWY	VENICE, FL 34293	HOMEBUILDER	CHE
2020	M3	03/18/2020	1,000.00	JOHN CANNON HOMES, INC	6710 PROFESSIONAL PKWY W	SARASOTA, FL 34240	REAL ESTATE BROKER	CHE
2020	M3	03/26/2020	2,000.00	TRANS-UNITED DEVELOPMENT CORP	1651 WHITFIELD AVE UNIT 200	SARASOTA, FL 34243	FREIGHT MGMT	CHE
2020	M3	03/30/2020	5,000.00	XAPA, LLC	108 W 13TH ST	WILMINGTON, DE 19801	REAL ESTATE	CHE
2020	M3	03/31/2020	500.00	CORE CONSTRUCTION SERVICES OF	8027 COOPER CREEK BLVD STE 110	UNIVERSITY PARK, FL 34201	CONSTRUCTION	CHE
2020	M4	04/21/2020	2,500.00	QUEENSGATE HOMES INC	400-3800 STEELES AVE W	WOODBIDGE, ONTARIO, XC 449	REAL ESTATE DEV	CHE
2020	M4	04/30/2020	1,000.00	GRANT MICHAEL	*****	*****	MEDICAL TRANSPORT	CHE
2020	P1	06/03/2020	19,000.00	BENDERSON DEVELOPMENT CO, LLC	570 DELAWARE AVE	BUFFALO, NY 14202	LAND DEVELOPMENT	CHE
2020	P1	06/03/2020	800.00	TAYLOR MORRISON INC BUILDING S	4900 N SCOTTSDALE RD STE 2000	SCOTTSDALE, AZ 85251	PAC	CHE
2020	P3	07/07/2020	20,000.00	SUN COAST PATRIOTS	115 E PARK AVE STE 1	TALLAHASSEE, FL 32301	PAC	CHE
2020	P4	07/14/2020	5,000.00	RAVE INVESTMENTS INC	301 BEACH RD UNIT 1	SARASOTA, FL 34242	REAL ESTATE	CHE
2020	P4	07/14/2020	11,400.00	SCHROEDER MANATEE RANCH, INC	14400 COVENANT WAY	LAKEWOOD RANCH, FL 34202	LAND DEVELOPER	CHE
2020	P4	07/15/2020	7,000.00	BENDERSON DEVELOPMENT CO, LLC	570 DELAWARE AVE	BUFFALO, NY 14202	LAND DEVELOPMENT	CHE
			97,300.00					

18 Contribution(s) Selected

[Query the Campaign Finance Data Base](#)

[\[Department of State\]](#) [\[Division of Elections\]](#) [\[Candidates and Races\]](#) [\[Campaign Finance Information\]](#)



Florida Department of State
Division of Elections

Campaign Expenditures

Florida Country

This information is being provided as a convenience to the public, has been processed by the Division of Elections and should be cross referenced with the original report on file with the Division of Elections in case of questions
[About the Campaign Finance Data Base](#)

Rpt Yr	Rpt Type	Date	Amount	Expense Paid To	Address	City State Zip	Purpose	Typ Reimb
2020	M3	03/16/2020	75.80	WEBELECT	10150 HIGHLAND MANOR DR STE 20	TAMPA, FL 33610	FINANCE SOFTWARE	MON
2020	M3	03/18/2020	133.58	DELUXE	PO BOX 64468	SAINT PAUL, MN 55164	BANKING SUPPLIES	MON
2020	M3	03/19/2020	200.00	JIM BOYD CAMPAIGN	133 HARBOR DR S	VENICE, FL 34285	CONTRIBUTION FL STATE SENATOR DIST 21	CAN
2020	M3	03/19/2020	21.40	ROBINSON GRUTERS & ROBERTS PA	133 HARBOR DR S	VENICE, FL 34285	REIMB CAMPAIGN RELATED EXPENSES	RMB
2020	M3	03/19/2020	200.00	TOMMY GREGORY CAMPAIGN	133 HARBOR DR S	VENICE, FL 34285	CONTRIBUTION FL STATE REP DISTRICT 73	CAN
2020	M4	04/01/2020	350.00	ROBINSON GRUTERS & ROBERTS PA	133 HARBOR DR S	VENICE, FL 34285	ACCOUNTING SERVICES	MON
2020	M5	05/01/2020	350.00	ROBINSON GRUTERS & ROBERTS PA	133 HARBOR DR S	VENICE, FL 34285	ACCOUNTING SERVICES	MON
2020	P1	06/01/2020	350.00	ROBINSON GRUTERS & ROBERTS PA	133 HARBOR DR S	VENICE, FL 34285	ACCOUNTING SERVICES	MON
2020	P1	06/09/2020	200.00	NANCY DETERT CAMPAIGN	133 HARBOR DR S	VENICE, FL 34285	CONTRIB SARASOTA COUNTY COMMISSIONER	CAN
2020	P2A	06/30/2020	4,793.10	POLITICAL INK, INC	1200 18TH ST NW STE 700	WASHINGTON, DC 20036	DIRECT MAIL/POSTAGE/SHIPPING ADS	MON
2020	P2A	07/01/2020	500.00	ROBINSON GRUTERS & ROBERTS PA	133 HARBOR DR S	VENICE, FL 34285	ACCOUNTING SERVICE	MON
2020	P2A	07/02/2020	4,793.10	POLITICAL INK, INC	1200 18TH ST NW STE 700	WASHINGTON, DC 20036	MAILERS/POSTAGE/SHIPPING	MON
2020	P3	07/07/2020	4,849.96	POLITICAL INK, INC	1200 18TH ST NW STE 700	WASHINGTON, DC 20036	MAILERS/POSTAGE/SHIPPING	MON
2020	P4	07/13/2020	4,902.66	POLITICAL INK, INC	1200 18TH ST NW STE 700	WASHINGTON, DC 20036	MAILERS/POSTAGE	MON
2020	P4	07/13/2020	500.00	THE THOMSON GROUP	639 OAKFORD RD	SARASOTA, FL 34240	SOCIAL MEDIA	MON
2020	P4	07/14/2020	78.75	SOLAZ CARSON	1281 A ENCORE WAY, FRUITVILLE	SARASOTA, FL 34236	CONTRACT SERVICE	MON
2020	P4	07/15/2020	52.50	BAUER GILLETTE	304 YACHT HARBOR DR	OSPREY, FL 34229	CONTRACT SERVICE	MON
2020	P4	07/16/2020	4,877.15	POLITICAL INK, INC	1200 18TH ST NW STE 700	WASHINGTON, DC 20036	MAILERS/POSTAGE/SHIP	MON

27,228.00

18 Expenditure(s) Selected

[Query the Campaign Finance Data Base](#)

[\[Department of State\]](#) [\[Division of Elections\]](#) [\[Candidates and Races\]](#) [\[Campaign Finance Information\]](#)

52 USC 30121: Contributions and donations by foreign nationals

Text contains those laws in effect on July 27, 2020

From Title 52-VOTING AND ELECTIONS

Subtitle III-Federal Campaign Finance

CHAPTER 301-FEDERAL ELECTION CAMPAIGNS

SUBCHAPTER I DISCLOSURE OF FEDERAL CAMPAIGN FUNDS

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§30121. Contributions and donations by foreign nationals**(a) Prohibition**

It shall be unlawful for

(1) a foreign national, directly or indirectly, to make-

(A) a contribution or donation of money or other thing of value, or to make an express or implied promise to make a contribution or donation, in connection with a Federal, State, or local election;

(B) a contribution or donation to a committee of a political party; or

(C) an expenditure, independent expenditure, or disbursement for an electioneering communication (within the meaning of section 30104(f)(3) of this title); or

(2) a person to solicit, accept, or receive a contribution or donation described in subparagraph (A) or (B) of paragraph (1) from a foreign national.

(b) "Foreign national" defined

As used in this section, the term "foreign national" means-

(1) a foreign principal, as such term is defined by section 611(b) of title 22, except that the term "foreign national" shall not include any individual who is a citizen of the United States ; or

(2) an individual who is not a citizen of the United States or a national of the United States (as defined in section 1101(a)(22) of title 8) and who is not lawfully admitted for permanent residence, as defined by section 1101(a)(20) of title 8.

(Pub. L. 92-225, title III, §319, formerly §324, as added Pub. L. 94-283, title I, §112(2), May 11, 1976, 90 Stat. 493 ; renumbered 319, Pub. L. 96-187, title I, §105(5), Jan 8, 1980, 93 Stat. 1354 ; amended Pub. L. 107-155, title III, §§303, 317, Mar. 27, 2002, 116 Stat. 96 , 109.)

CODIFICATION

Section was formerly classified to section 441e of Title 2, The Congress, prior to editorial reclassification and renumbering as this section.

PRIOR PROVISIONS

A prior section 319 of Pub. L. 92-225 was renumbered section 314, and is classified to section 30115 of this title.

Another prior section 319 of Pub. L. 92-225 was renumbered section 318, and was classified to section 439b of Title 2, The Congress, prior to repeal by Pub. L. 96-187.

AMENDMENTS

2002-Pub. L. 107-155, §303(1), substituted "Contributions and donations by foreign nationals" for "Contributions by foreign nationals" in section catchline.

Subsec. (a). Pub. L. 107-155, §303(2), added subsec. (a) and struck out former subsec. (a) which read as follows: "It shall be unlawful for a foreign national directly or through any other person to make any contribution of money or other thing of value, or to promise expressly or impliedly to make any such contribution, in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office; or for any person to solicit, accept, or receive any such contribution from a foreign national."

Subsec. (b)(2). Pub. L. 107–155, §317, inserted "or a national of the United States (as defined in section 1101(a)(22) of title 8)" after "United States".

EFFECTIVE DATE OF 2002 AMENDMENT

Amendment by Pub. L. 107–155 effective Nov. 6, 2002, see section 402 of Pub. L. 107–155, set out as an Effective Date of 2002 Amendment; Regulations note under section 30101 of this title.