

BEFORE THE FEDERAL ELECTION COMMISSION

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

v.

MUR No. **7783**

BYRON DONALDS
c/o Byron Donalds for Congress
2430 Vanderbilt Beach Road, STE 108 PMB 260
Naples, FL 34108

FRIENDS OF BYRON DONALDS
Noreen Fenner, Treasurer
1103 Hays Street
Tallahassee, FL 32301

CONSERVATIVES FOR EFFECTIVE GOVERNMENT
David E. Ramba, Treasurer
120 South Monroe Street
Tallahassee, FL 32301

COMPLAINT

1. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that federal candidate Byron Donalds violated 52 U.S.C. § 30125(e)(1)(A) by “transfer[ring]” nonfederal funds from a candidate-controlled state political committee, Friends of Byron Donalds, to a federal super PAC in connection with Donalds’s federal election. Additionally, there is reason to believe that the state political committees Conservatives for Effective Government and Friends of Byron Donalds made a contribution to the federal super PAC in violation of federal law’s straw donor ban at 52 U.S.C. § 30122.

2. In the months before declaring his candidacy for Congress, Byron Donalds formed a new Florida political committee called “Friends of Byron Donalds” and raised nearly \$100,000; many donations exceeded federal limits, and came from donors prohibited from supporting Donalds’s Congressional campaign, such as federal contractor GEO Group. In January 2020, just days before Donalds filed his statement of candidacy, Friends of Byron Donalds transferred \$87,000 to another Florida political committee, Conservatives for Effective Government; in May 2020, Conservatives for Effective Government passed \$107,000 back to Friends of Byron Donalds, which weeks later gave \$107,000 to the federal super PAC Trusted Conservatives. That super PAC went on to make independent expenditures supporting Donalds’s Congressional campaign. The involvement of Byron Donalds or his agents in this complicated chain of transfers had the effect of funneling illegal contributions into Donalds’s federal race, and these transfers additionally obscured the true sources of Donalds’s support.
3. “If the Commission, upon receiving a complaint . . . has reason to believe that a person has committed, or is about to commit, a violation of [the Federal Election Campaign Act (“FECA”)] . . . [t]he Commission *shall* make an investigation of such alleged violation” 52 U.S.C. § 30109(a)(2) (emphasis added); *see also* 11 C.F.R. § 111.4(a).

FACTS

4. Byron Donalds has been a member of the Florida House of Representatives since 2016.¹
5. On August 22, 2019, Donalds formed “Friends of Byron Donalds,” a Florida state political committee; Donalds was listed as the committee’s chair and signed the statement

¹ See, e.g., Ryan Mills, *Byron Donalds: Education, Water Will Be Focus of Second Term in Florida House District 80*, NAPLES DAILY NEWS (Nov. 7, 2018), <https://www.naplesnews.com/story/news/politics/elections/2018/11/06/election-2018-florida-byron-donalds-wins-re-election/1892392002/>.

of organization.² As of August 2020, the home page of the Friends of Byron Donalds website (<http://friendsofbyrondonalds.org/>) states that “Representative Byron Donalds is associated with Friends of Byron Donalds.”³

6. Between September 2019 and January 2020, Friends of Byron Donalds raised approximately \$98,707 with nearly half of those funds raised in December 2019.⁴
7. On January 3, 2020, Friends of Byron Donalds contributed \$87,000 to another Florida political committee, the Conservatives for Effective Government.⁵
8. That same day, January 3, 2020, Friends of Byron Donalds filed a statement declaring that Byron Donalds had resigned as chair of the committee.⁶
9. On January 6, 2020, Byron Donalds filed a statement of candidacy for the Republican nomination in Florida’s 19th Congressional District.⁷
10. On January 24, 2020, the federal independent expenditure-only committee (*i.e.* super PAC) Trusted Conservatives filed a statement of organization with the Commission.⁸

² Friends of Byron Donalds, Statement of Organization of Political Committee, Florida Department of State Division of Elections (Aug. 22, 2019), <https://dos.elections.myflorida.com/campaign-docs/?account=74495> (attached as Exhibit A).

³ FRIENDS OF BYRON DONALDS, <http://friendsofbyrondonalds.org/> (last visited Aug. 17, 2020) (website’s home page attached as Exhibit B).

⁴ See *Contributions*, Friends of Byron Donalds, <http://friendsofbyrondonalds.org/files/contributions.pdf> (last visited Aug. 17, 2020) (attached as Exhibit C). These records are also available on the Florida Division of Elections’ website. See Friends of Byron Donalds, Campaign Finance Activity, Florida Department of State Division of Elections, <https://dos.elections.myflorida.com/committees/ComDetail.asp?account=74495> (last visited Aug. 17, 2020).

⁵ See Campaign Expenditures, Friends of Byron Donalds, January 2020, Florida Department of State Division of Elections (attached as Exhibit D). These records are also available on the Florida Division of Elections’ website. See Friends of Byron Donalds, Campaign Finance Activity, Florida Department of State Division of Elections, <https://dos.elections.myflorida.com/committees/ComDetail.asp?account=74495> (last visited Aug. 17, 2020). Conservatives for Effective Government reported receiving the transfer on January 7, 2020. See Conservatives for Effective Government, Campaign Finance Activity, Florida Department of State Division of Elections, <https://dos.elections.myflorida.com/committees/ComDetail.asp?account=69596>.

⁶ Friends of Byron Donalds, Change of Officers, Florida Department of State Division of Elections (Jan. 3, 2020), <https://dos.elections.myflorida.com/campaign-docs/?account=74495> (attached as Exhibit E).

⁷ Byron Donalds, Statement of Candidacy, FEC Form 2 (filed Jan. 6, 2020), <https://docquery.fec.gov/pdf/212/202001069167021212/202001069167021212.pdf>.

⁸ Trusted Conservatives, Statement of Organization, FEC Form 1 (Jan. 21, 2020), <https://docquery.fec.gov/pdf/144/202001240300308144/202001240300308144.pdf>.

11. On May 28, 2020, Conservatives for Effective Government—which had received \$87,000 from Friends of Byron Donalds on January 3, 2020—contributed \$107,038.66 to Friends of Byron Donalds.⁹ Prior to that contribution, Friends of Byron Donalds had \$2,340 cash-on-hand.¹⁰
12. On June 22, 2020, the federal super PAC Trusted Conservatives received a \$107,456 contribution from Friends of Byron Donalds, according to that committee’s report filed with the Commission.¹¹
13. On August 11, 2020, Trusted Conservatives reported its first independent expenditures in the 2020 cycle, disclosing approximately \$82,025 in direct mail expenditures supporting Donalds’s candidacy or opposing his challengers in the FL-19 race.¹²

CAUSES OF ACTION

COUNT I:

BYRON DONALDS VIOLATED FECA’S SOFT MONEY PROHIBITION

14. There is reason to believe that Byron Donalds violated the soft money ban on a federal candidate “transfer[ring]” non-federal funds in connection with a federal election, 52 U.S.C. § 30125(e)(1)(A).

⁹ *Contributions*, Friends of Byron Donalds, *supra* note 4.

¹⁰ See Friends of Byron Donalds, Campaign Finance Activity, Florida Department of State Division of Elections, <https://dos.elections.myflorida.com/committees/ComDetail.asp?account=74495>.

¹¹ Trusted Conservatives, 2020 July Quarterly Report, FEC Form 3X at 7 (filed July 9, 2020), <https://docquery.fec.gov/pdf/152/202007099244397152/202007099244397152.pdf>. Weeks earlier, on June 4, 2020, Friends of Byron Donalds filed a disbandment letter with Florida’s division of elections. Friends of Byron Donalds, Disbandment Letter, Florida Department of State Division of Elections (June 4, 2020), <https://dos.elections.myflorida.com/campaign-docs/?account=74495> (attached as Exhibit F). Friends of Byron Donalds also never disclosed to Florida election officials that it made a contribution to Trusted Conservatives. See Exhibit C.

¹² Trusted Conservatives, 24/48 Hour Report of Independent Expenditures, FEC Schedule E at 1-7 (filed Aug. 11, 2020), <https://docquery.fec.gov/pdf/535/202008119261294535/202008119261294535.pdf>.

15. Federal law contains a “soft money” prohibition to prevent circumvention of the base contribution limits, and of source prohibitions such as the ban on contractor and corporate contributions to federal candidates. Section 30125(e)(1) states:

A candidate, individual holding Federal office, agent of a candidate or individual holding Federal office, or an entity directly or indirectly established, financed, maintained or controlled by or acting on behalf of 1 or more candidates or individuals holding Federal office, shall not —

(A) solicit, receive, direct, transfer, or spend funds in connection with an election for Federal office, including funds for any Federal election activity, unless the funds are subject to the limitations, prohibitions, and reporting requirements of this Act

52 U.S.C. § 30125(e)(1) (emphasis added).

16. This soft money prohibition is broad. It applies, *inter alia*, to any candidate for federal office, to any agent of a candidate, and to any “entity directly or indirectly established, financed, maintained or controlled by or acting on behalf of” a candidate. *Id.*; *see also* 11 C.F.R. §§ 300.60, 300.61. Candidates and their agents cannot “solicit, receive, direct, transfer, or spend funds in connection with an election for Federal office” unless those funds comply with federal law’s contribution limits, prohibitions, and reporting requirements. 52 U.S.C. § 30125(e)(1).
17. As the Commission recently observed, together these soft money provisions “are designed to prevent the use of funds that are outside the limitations and prohibitions of the Act in federal elections, and to ensure that all funds used in federal elections are reported.” Factual and Legal Analysis at 4, MUR 7109 (Portantino).
18. Friends of Byron Donalds is a committee “established,” and “controlled by or acting on behalf of” Donalds: the entity bears Donalds’s name, Donalds signed the committee’s statement of organization and listed himself as the committee’s chair, and as of August

2020, the committee's website states that "Representative Byron Donalds is associated with Friends of Byron Donalds."¹³

19. Friends of Byron Donalds raised funds under non-federal limits and from prohibited sources. For example, Friends of Byron Donalds accepted donations from at least one federal contractor and from over a dozen corporations, and accepted contributions from state PACs in excess of federal limits.¹⁴ Under federal law, contractors are prohibited from making contributions to political committees, 52 U.S.C. § 30119, corporations are barred from contributing to political committees (other than to super PACs), 52 U.S.C. § 30118, and non-connected multicandidate political committees are prohibited from making contributions to other committees in excess of \$5,000 (other than to party committees), 52 U.S.C. § 30116(a)(2)(A)-(C).
20. On January 3, 2020, \$87,000 of the non-federal funds raised by Friends of Byron Donalds were passed to Conservatives for Effective Government,¹⁵ which on May 28, 2020 then passed \$107,038 of non-federal funds back to Friends of Byron Donalds¹⁶; it is possible that some or all of the non-federal funds originally raised by Friends of Byron Donalds were transferred back to the committee on May 28, 2020. Yet taken alone, Friends of Byron Donalds raised non-federal funds by accepting the \$107,038 transfer from Conservatives for Effective Government, since under federal law non-connected multicandidate political committees are prohibited from making contributions to other

¹³ See sources cited *supra* ¶ 5.

¹⁴ See sources cited *supra* ¶ 6 (disclosing a \$5,000 donation from federal contractor GEO Group, over a dozen donations from corporations, and donations from political committees in excess of federal limits, such as \$7,500 from the Consumer Protection Alliance and \$107,038 from Conservatives for Effective Government).

¹⁵ See sources cited *supra* ¶ 7.

¹⁶ See sources cited *supra* ¶ 11.

committees in excess of \$5,000 (other than to party committees), 52 U.S.C. § 30116(a)(2)(A)-(C).

21. After Donalds became a federal candidate, Friends of Byron Donalds—an entity “established” and “controlled by or acting on behalf of” Donalds—contributed \$107,456 in non-federal funds to Trusted Conservatives, which then disseminated independent expenditures supporting Donalds’s federal candidacy.
22. Therefore, there is reason to believe that Byron Donalds violated the soft money ban on a federal candidate “transfer[ring]” non-federal funds in connection with a federal election. 52 U.S.C. § 30125(e)(1)(A).

**COUNT II:
RESPONDENTS VIOLATED FECA’S STRAW DONOR PROHIBITION**

23. There is additionally reason to believe that the transfers . . . violated FECA’s “straw donor” prohibition, which 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.” 52 U.S.C. § 30122.
24. The Commission regulation implementing the statutory prohibition on “contributions in the name of another” 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.” 11 C.F.R. § 110.4(b)(2)(i).

- 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.” 11 C.F.R. § 110.4(b)(2)(ii).
25. On May 28, 2020, Conservatives for Effective Government contributed \$107,038.66 to Friends of Byron Donalds; prior to that contribution, Friends of Byron Donalds had only \$2,340 cash-on-hand.¹⁷ On June 22, 2020, the federal super PAC Trusted Conservatives received a \$107,456 contribution, and attributed it to Friends of Byron Donalds, according to Trusted Conservatives’ report filed with the Commission.¹⁸ Friends of Byron Donalds did not have sufficient cash-on-hand to cover the contribution to Trusted Conservatives absent the infusion of funds from Conservatives for Effective Government.¹⁹
26. Given the timing and amount of these transfers, there is reason to believe that Conservatives for Effective Government violated 52 U.S.C. § 30122 by “[m]aking a contribution of money” to Trusted Conservatives and “attributing as the source of the money” Friends of Byron Donalds, “when in fact” Conservatives for Effective Government “was the source.” *See* 11 C.F.R. § 110.4(b)(2)(ii).
27. There is additionally reason to believe that Friends of Byron Donalds violated 52 U.S.C. § 30122 by knowingly permitting its name to be used to effect Conservatives for Effective Government’s straw donor contributions to Trusted Conservatives, and by

¹⁷ *See* sources cited *supra* ¶ 11.

¹⁸ *See* sources cited *supra* ¶ 13.

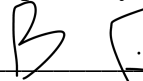
¹⁹ Months before Conservatives for Effective Government gave \$107,038 to Friends of Byron Donalds, Friends of Byron Donalds had given \$87,000 to Conservatives for Effective Government. *See* sources cited *supra* ¶¶ 7, 11. Yet even if some portion of Conservatives for Effective Government’s May 28, 2020 contribution to Friends of Byron Donalds included funds that had originated with Friends of Byron Donalds, when Friends of Byron Donalds contributed \$107,456 to Trusted Conservatives on June 22, 2020, at least \$20,000 of that contribution was attributable to Conservatives for Effective Government.

“[g]iving money . . . , all or part of which was provided to” Friends of Byron Donalds by Conservatives for Effective Government (*i.e.*, the true contributor) without disclosing the source of money at the time the contribution was made. *See* 11 C.F.R. § 110.4(b)(2)(i).

PRAYER FOR RELIEF

28. Wherefore, the Commission should find reason to believe that Byron Donalds, Friends of Byron Donalds, and Conservatives for Effective Government have violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
29. Further, the Commission should seek appropriate sanctions for any and all violations, including civil penalties sufficient to deter future violations and an injunction prohibiting the respondents from any and all violations in the future, and should seek such additional remedies as are necessary and appropriate to ensure compliance with the FECA.

Respectfully submitted,



Campaign Legal Center, by
Brendan M. Fischer
1101 14th Street NW, Suite 400
Washington, DC 20005
(202) 736-2200

Brendan M. Fischer
Campaign Legal Center
1101 14th Street NW, Suite 400
Washington, DC 20005
Counsel to the Campaign Legal Center

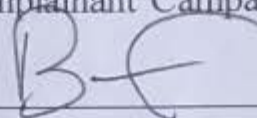
August 17, 2020

VERIFICATION

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

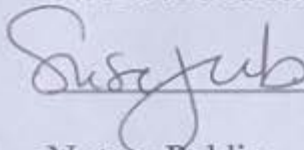
Sworn pursuant to 18 U.S.C. § 1001.

For Complainant Campaign Legal Center



Brendan M. Fischer

Sworn to and subscribed before me this 18th day of August 2020.



Notary Public

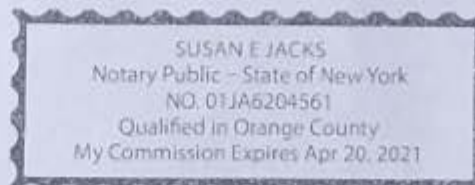


EXHIBIT A

HAND DELIVERED

STATEMENT OF ORGANIZATION OF POLITICAL COMMITTEE

(PLEASE TYPE)

OFFICE USE ONLY

RECEIVED
DEPARTMENT OF STATE

2019 AUG 22 PM 2:31

DIVISION OF ELECTIONS
TALLAHASSEE, FL

1. Full Name of Committee
Friends of Byron Donalds

Telephone
850-212-0226

Mailing Address (include city, state and zip code)
1103 Hays Street, Tallahassee, Florida 32301

Street Address (include city, state and zip code)
1103 Hays Street, Tallahassee, Florida 32301

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

Statewide political committee to support or oppose candidates for statewide, legislative, multi-county, county and municipal offices and other activities not prohibited by Chapter 106, Florida Statutes.

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
Noreen A. Fenner	1103 Hays Street Tallahassee, Florida 32301	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
Byron Donalds	1103 Hays Street Tallahassee, Florida 32301	Chair

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 Section 527 organizations, candidates or as otherwise provided by law.

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

Name of Bank or Depository & Account Number	Mailing Address
Wells Fargo	3121 Mahan Drive Tallahassee, Florida 32308

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, March 15, annually, May 15, annually	Internal Revenue Service	Ogden, UT 84201

STATE OF Florida

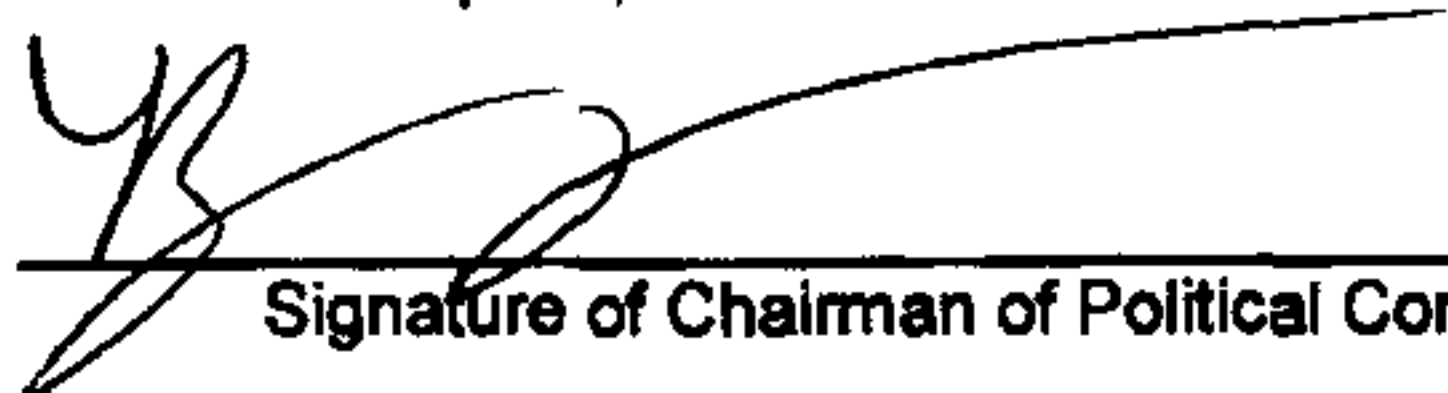
Collier

COUNTY

I, Byron Donalds, certify that the information in this Statement of

Organization is complete, true and correct.

X



Signature of Chairman of Political Committee

8/20/19

Date

EXHIBIT B

Friends of Byron Donalds

WELCOME TO OUR WEBSITE

[VIEW MISSION STATEMENT](#)

MISSION STATEMENT

The purpose of this organization is to promote and support principled conservative causes and candidates in the State of Florida. To achieve these purposes, the Organization is empowered, subject to applicable federal and state law, to solicit and accept voluntary contributions; to expend such contributions to further these principles; to employ such persons as necessary to further the purpose of the Organization; and to do any and all things necessary or desirable for the attainment of these purposes.

Representative Byron Donalds is associated with Friends of Byron Donalds.



CONTRIBUTIONS

Please click here (</files/contributions.pdf>) to see the latest listing of contributions.



EXPENDITURES

Please click here (</files/expenditures.pdf>) to see the latest listing of expenditures.



CONTACT US

Please use the form below to send us a message.

Your Name *

Your Email *

Your Phone *

Your Message *

SEND MESSAGE

Copyright © 2019 Friends of Byron Donalds. All rights reserved.

1103 Hays Street |allahassee, Florida 32301 | 850/212 0226

EXHIBIT C

Contributions

Date of Deposit	Amount	Contributor	Address	City/State/Zip	Occupation
9/18/2019	2,500.00	McGuire Woods	800 East Canal Street	Richmond, VA 23219	Law Firm
9/18/2019	5,000.00	FCCI Services, Inc.	6300 University Parkway	Sarasota, FL 34240	Insurance
10/16/2019	5,000.00	Florida Professional Employer Organization PAC	311 East Park Avenue	Tallahassee, FL 32301	Political Committee
10/16/2019	2,500.00	IMPACT	Post Office Box 12001	Tallahassee, FL 32317	Political Committee
10/17/2019	5,000.00	Florida Patient Access	1103 Hays Street	Tallahassee, FL 32301	Political Committee
10/17/2019	2,500.00	American Integrity MGA, LLC	5426 Bay Center Drive, Ste 650	Tampa, FL 33609	Insurance
10/17/2019	1,000.00	ChiroPAC PC	30 Remington Road, Ste 1	Oakland, FL 34787	Political Committee
11/3/2019	1,500.00	SURPAC	325 John Knox Road, Ste L103	Tallahassee, FL 32303	Political Committee
11/6/2019	2,500.00	Comcast	1701 JFK Boulevard	Philadelphia, PA 19103	Cable Communications
11/9/2019	2,500.00	Florida Prosperity Fund	Post Office Box 10085	Tallahassee, FL 32302	Political Committee
11/13/2019	7,500.00	Consumer Protection Alliance	2600 South Douglas Road, Suite 900	Coral Gables, FL 33134	Political Committee
11/13/2019	5,000.00	Committee of Florida Agents	1103 Hays Street	Tallahassee, FL 32301	Political Committee
11/13/2019	2,500.00	Ronald Book P.A.	18851 Northeast 29th Avenue, Suite 1010	Aventura, FL 33180	Governmental Relations
11/13/2019	2,500.00	Southwest Florida Enterprises, Inc.	Post Office Box 350940	Miami, FL 33135	Wagering & Gaming
11/13/2019	2,500.00	Amscot Corporation	600 North Westshore Boulevard, Suite 1200	Tampa, FL 33609	Financial Services
11/15/2019	1,000.00	Employers EIG Services	10375 Professional Circle	Reno, NV 89521	Insurance
11/18/2019	1,500.00	Florida Association of Health Plans PC	Post Office Box 10748	Tallahassee, FL 32302	Political Committee
12/2/2019	26.00	Florida Insurance Council, Inc.	Post Office Box 749	Tallahassee, FL 32302	Association
12/3/2019	181.00	Florida Insurance Council, Inc.	Post Office Box 749	Tallahassee, FL 32302	Association
12/10/2019	2,500.00	The Doctors Company Florida PAC	Post Office Box 2900	Napa, CA 94558	Political Committee
12/10/2019	5,000.00	American Builders Insurance Company	Post Office Box 723099	Atlanta, GA 31139	Insurance
12/10/2019	2,500.00	Sentry	1800 North Point Drive	Stevens Point, WI 54481	Insurance
12/10/2019	5,000.00	The Geo Group Inc.	4955 Technology Way	Boca Raton, FL 33431	Correctional Facility
12/10/2019	5,000.00	Insikt Inc.	333 Bush Street, 17th Floor	San Francisco, CA 94104	Financial Services
12/10/2019	1,000.00	Florida Home Builders PAC	2600 Centennial Place	Tallahassee, FL 32308	Political Committee

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EXHIBIT D

Florida Department of State
Division of Elections

Campaign Expenditures

Friends of Byron Donalds

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](#)

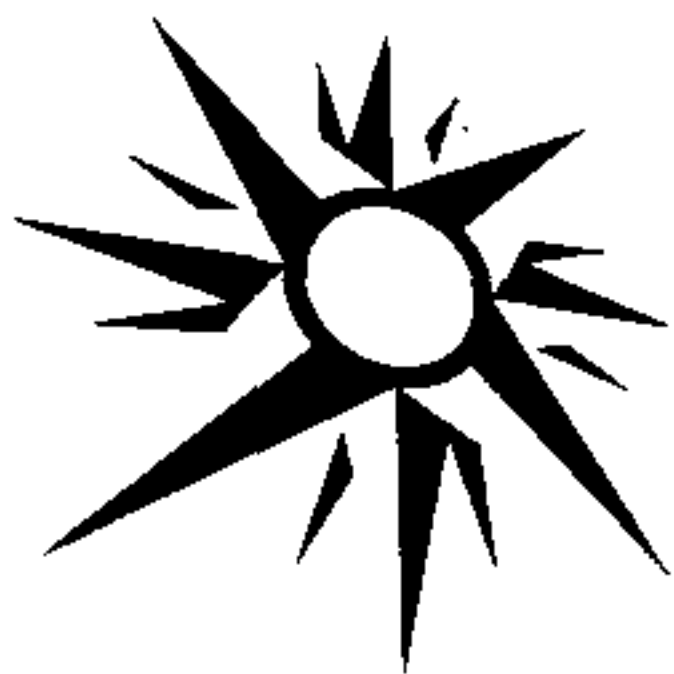
Rpt Yr	Rpt Type	Date	Amount	Expense Paid To	Address	City State Zip
2020	M1	01/03/2020	87,000.00	CONSERVATIVES FOR EFFECTIVE GO	120 SOUTH MONROE STREET	TALLAHASSEE, FL 32301
2020	M1	01/17/2020	1,154.00	PAC FINANCIAL MANAGEMENT	8489 CABIN HILL ROAD	TALLAHASSEE, FL 32311
			88,154.00			

2 Expenditure(s) Selected

[Query the Campaign Finance Data Base](#)

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

EXHIBIT E



PAC Financial Management

January 3, 2020

HAND DELIVERED

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DEPARTMENT OF STATE

2020 JAN -3 PM 3:34

DIVISION OF ELECTIONS
TALLAHASSEE, FL

VIA HAND DELIVERY

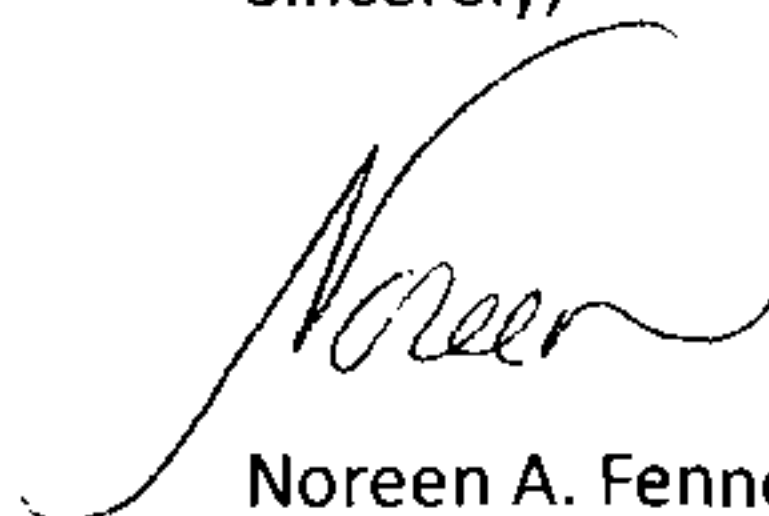
Ms. Kristi Willis
Florida Division of Elections
Room 316, RA Gray Building
500 South Bronough Street
Tallahassee, Florida 32399

RE: Friends of Bryon Donalds
Account Number 74495

Dear Kristi:

Please be advised that Byron Donalds has resigned as Chair of Friends of Byron Donalds. I have been appointed as the new Chair. Please update your records accordingly.

Sincerely,



Noreen A. Fenner

HAND DELIVERED

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2020 JAN -3 PM 3:34

DIVISION OF ELECTIONS
TALLAHASSEE, FL

January 3, 2020

VIA HAND DELIVERY

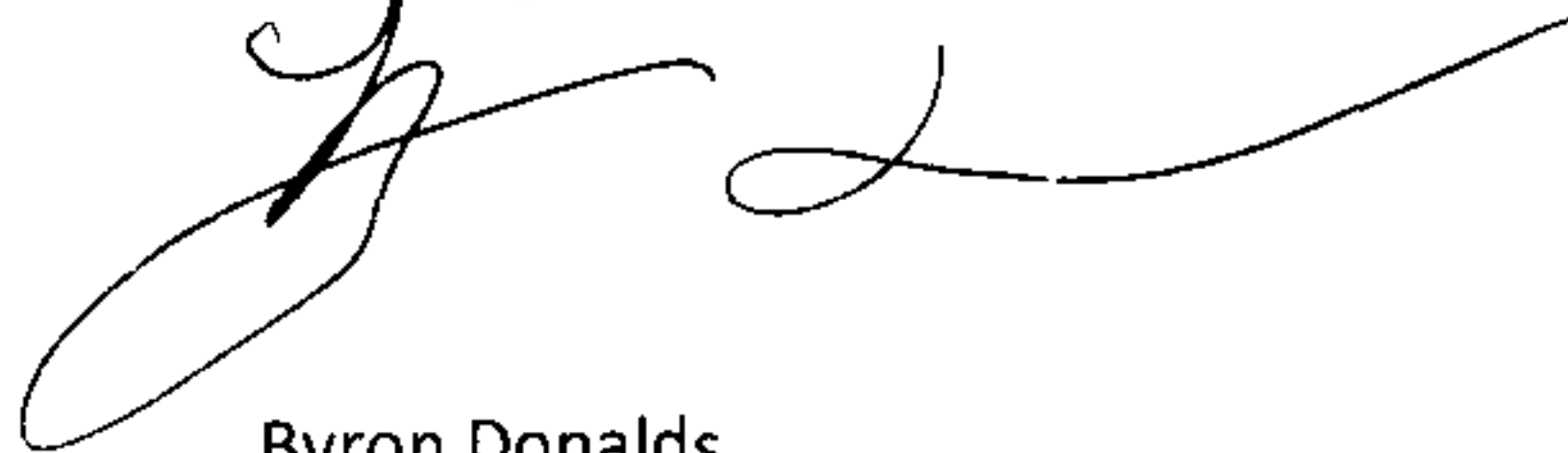
Ms. Kristi Willis
Florida Division of Elections
Room 316, RA Gray Building
500 South Bronough Street
Tallahassee, Florida 32399

RE: Friends of Bryon Donalds
Account Number 74495

Dear Ms. Wills:

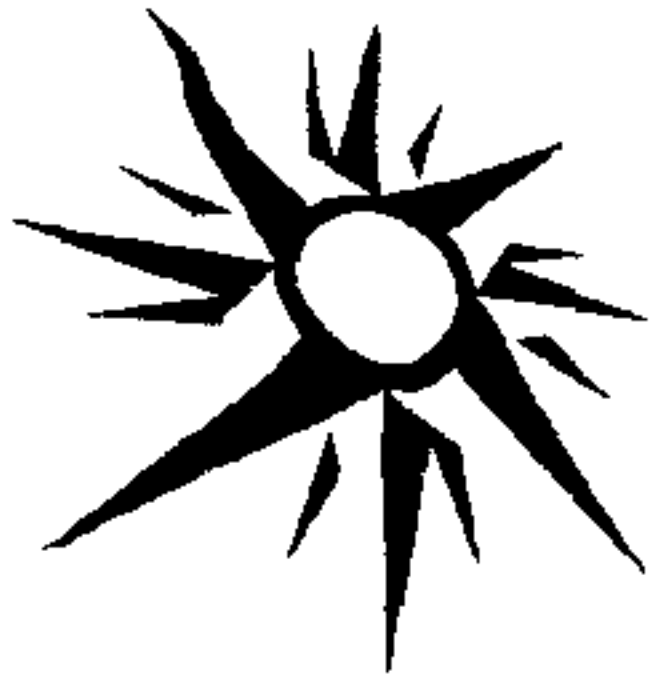
Effective immediately, I hereby resign as Chair of Friends of Byron Donalds. Noreen Fenner has been appointed as Chair. Please update your records accordingly.

Sincerely,

A handwritten signature in black ink, appearing to read 'Byron Donalds', with a large, stylized initial 'B' and a long, sweeping horizontal stroke extending to the right.

Byron Donalds

EXHIBIT F



**PAC Financial
Management**

RECEIVED

2020 JUN -4 AM 9:52

**DIVISION OF ELECTIONS
TALLAHASSEE, FL**

June 4, 2020

VIA HAND DELIVERY

Ms. Kristi Willis
Florida Division of Elections
Room 316, RA Gray Building
500 South Bronough Street
Tallahassee, Florida 32399

RE: Friends of Byron Donalds
Account Number 74495

Dear Kristi:

Please be advised that Friends of Byron Donalds has ceased operations. Please close this account.

Please let me know if you have any questions or need anything further. Thank you for your assistance.

Sincerely,

Noreen A. Fenner