

MAY 2, 2022 11:04 AM

OFFICE OF GENERAL COUNSEL


BEFORE THE FEDERAL ELECTION COMMISSION

CAMPAIGN LEGAL CENTER
1101 14th Street NW, Suite 400
Washington, DC 20005
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ROGER G. WIEAND
1101 14th Street NW, Suite 400
Washington, DC 20005

v. MUR No. **7994**

ML ORGANIZATION, LLC
2377 E. Silver Palm Rd.
Boca Raton, FL 33432

WILLIAM PULTE

Boca Raton, FL 33432

ANY UNKNOWN PERSON(S)
who made a contribution to Make
America Great Again, Again! Inc.
in the name of ML Organization, LLC

COMPLAINT

1. Make America Great Again, Again! Inc., an independent-expenditure only political committee (“TEOPC”) — commonly referred to as a super PAC — that is registered with the Federal Election Commission (“FEC”), reported receiving a \$500,000 contribution from ML Organization, LLC, on November 1, 2021. As set forth in this complaint, there is reason to believe that ML Organization, LLC (“ML Organization”) was not the true source of the \$500,000 contributed in its name to Make America Great Again, Again! Inc. (“MAGA Again”), and that one or more unknown person(s) — who may be William “Bill” Pulte and/or other persons — were, in fact, the true contributor(s).

2. This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and is based on information and belief that ML Organization, and any persons that created, operated and made contributions in the name of ML Organization (William Pulte and/or unknown other persons) violated the Federal Election Campaign Act (“FECA”), 52 U.S.C. § 30101, *et seq.* “If the Commission, upon receiving a complaint . . . has reason to believe that a person has committed, or is about to commit, a violation of [FECA] . . . [t]he Commission *shall make an investigation* of such alleged violation.”¹
3. There is no record of ML Organization having any activities or generating any income since it was registered as a Delaware domestic limited liability company (“LLC”) in April 2018. ML Organization has no website, social media account, business listings or online records, or any other discernible online presence. As shown on MAGA Again’s FEC reports, ML Organization disclosed an address in Boca Raton, Florida (located within Palm Beach County), in connection with the \$500,000 contribution made in its name, but searches of public records databases indicate that the LLC does not appear to own any property in Palm Beach County, Florida, or elsewhere.
4. Public records reflect that William Pulte owns the property at the address listed for ML Organization on FEC reports. Based on publicly available information, the property, which is zoned for residential, single-family use, appears to be Pulte’s home. Public records further identify Pulte as a director, manager, or registered agent for multiple companies whose public filings list Pulte’s address as the same address identified for ML Organization on FEC reports. Pulte has never previously disclosed this residential

¹ 52 U.S.C. § 30109(a)(2) (emphasis added); *see also* 11 C.F.R. § 111.4(a).

address in connection with contributions made in his own name, instead using the business address for one of his companies, Pulte Capital Partners, LLC.

5. Overall, the available information supports the conclusion that ML Organization did not have the means to contribute \$500,000 to an IEOPC absent an infusion of funds provided to it for that specific purpose, and thus that one or more unidentified true contributors provided funds to ML Organization for the specific purpose of having it contribute \$500,000 to MAGA Again without disclosing the true contributors' identities.
6. Accordingly, there is reason to believe that one or more unknown person(s) (William Pulte and/or other persons) violated the prohibition on making contributions in the name of another, 52 U.S.C. § 30122, and that ML Organization violated the same provision by knowingly permitting its name to be used to effect contributions of one or more other persons in its own name.

FACTS

7. MAGA Again is an independent-expenditure only political committee ("IEOPC") that registered with the Commission on October 1, 2021.² MAGA Again's Statement of Organization identifies Charles Gantt as the committee's treasurer.³
8. MAGA Again reported receiving a \$500,000 contribution from ML Organization on November 1, 2021.⁴ The committee reported ML Organization's address as "2377 E. Silver Palm Rd., Boca Raton, FL 33432."⁵ The city of Boca Raton is located in Palm Beach County, Florida.

² Make America Great Again, Again! Inc., Statement of Org. (Oct. 1, 2021).

³ *Id.*

⁴ Make America Great Again, Again! Inc., 2021 Year-End Report at 13 (Jan. 31, 2022).

⁵ *Id.*

9. FEC disclosure records indicate that ML Organization has made no other federal political contributions.⁶
10. “ML Organization LLC” was organized in Delaware as a domestic limited liability company on April 9, 2018.⁷ Its registration document provides that its registered agent is the Corporation Trust Company, located at “Corporation Trust Center, 1209 Orange St., Wilmington, DE 19801.”⁸ The LLC registration document does not disclose the LLC’s members, owners, or managers, its business purpose, or a mailing address.
11. Aside from ML Organization’s registration document, there is no publicly available information about the LLC; it does not appear to have any discernible public footprint:
 - a. Searches on Google provide no results that originate from ML Organization itself or that detail any activity by ML Organization; all results relate solely to the \$500,000 MAGA Again contribution at issue: A search for “ML Organization, LLC” yields results on OpenSecrets, The Daily Beast, POLITICO, The Washington Post, and other articles reporting on the contribution.⁹
 - b. ML Organization does not appear to have a public website, or any account or page on Facebook, Instagram, or Twitter.

⁶ All Receipts, “ML Organization,” https://www.fec.gov/data/receipts/?data_type=processed&contributor_name=ML+Organization (viewed Apr. 21, 2022).

⁷ “ML Organization LLC,” Search Information, Delaware Dep’t of State, Div. of Corps. (attached as Exhibit A).

⁸ *Id.*

⁹ Corporate Contributions to Outside Groups, OPENSECRETS, <https://www.opensecrets.org/outside-spending/corporate-contributions> (last visited Apr. 21, 2022); Trump’s New Super PAC Is Paying Off His Usual Suspects—Again, DAILY BEAST (Jan. 31, 2022), <https://www.thedailybeast.com/donald-trumps-new-super-pac-is-paying-off-his-usual-suspectsagain>; Trump super PAC Starts 2022 with \$9.5M Banked, POLITICO (Jan. 31, 2022), <https://www.politico.com/news/2022/01/31/trump-super-pac-elections-00003962>; Jan. 6 Committee is Following Trump’s Ripped Up Paper Trail, WASH. POST. (Feb. 1, 2022), <https://www.washingtonpost.com/politics/2022/02/01/jan-6-committee-is-following-trump-ripped-up-paper-trail/>.

- c. There is no record of ML Organization in searches with the Better Business Bureau,¹⁰ Bloomberg's company profile search,¹¹ EDGAR,¹² the U.S. Patent & Trademark Office's Trademark Electronic Search System,¹³ the Chamber of Commerce of the Palm Beaches,¹⁴ or the Greater Boca Raton Chamber of Commerce.¹⁵
- d. The Palm Beach County Property Appraiser does not list any properties owned by ML Organization, and there is no indication in public documents that it owns any property elsewhere.¹⁶
12. The \$500,000 contribution in ML Organization's name is the single largest contribution that MAGA Again has reported ever receiving; it is double the amount of the next largest contribution.¹⁷
13. News reports indicate that MAGA Again is directly affiliated with former President Donald J. Trump and will be used to support candidates that Trump endorses during the 2022 mid-term congressional elections.¹⁸

¹⁰ See Better Business Bureau, Search Businesses and Charities, <https://www.bbb.org/search/> (last visited Apr. 21, 2022).

¹¹ See Bloomberg, Company Search, <https://www.bloomberg.com/> (last visited Apr. 21, 2022).

¹² U.S. Securities and Exchange Commission, EDGAR, <https://www.sec.gov/edgar/search/> (last visited Apr. 21, 2022).

¹³ See U.S. Patent & Trademark Office, Search Trademark Database, <https://www.uspto.gov/trademarks/search> (last visited Apr. 21, 2022).

¹⁴ See Chamber of Commerce of the Palm Beaches, Business Directory, <https://business.palmbeaches.org/list/> (last visited Apr. 21, 2022).

¹⁵ See Greater Boca Raton Chamber of Commerce, Boca Raton Business Directory, <https://web.bocaratonchamber.com/boca/search> (last visited Apr. 21, 2022).

¹⁶ See Palm Beach County Property Appraiser Records Search, <https://www.pbcgov.org/papa/Asps/GeneralAdvSrch/SearchPage.aspx?f=a> (last visited Apr. 21, 2022).

¹⁷ Individual Contributions to Make America Great Again, Again! Inc., https://www.fec.gov/data/receipts/individual-contributions/?committee_id=C00790477 (viewed Apr. 21, 2022).

¹⁸ See Trump super PAC Starts 2022 with \$9.5M Banked, POLITICO (Jan. 31, 2022), <https://www.politico.com/news/2022/01/31/trump-super-pac-elections-00003962>.

14. William Pulte¹⁹ is the deeded owner of the property at “2377 E. Silver Palm Rd., Boca Raton, FL 33432,” the address for ML Organization disclosed on MAGA Again’s FEC disclosure report.²⁰ The deed indicates that Pulte purchased the property in June 2016.²¹
15. Records from the Palm Beach County Property Appraiser’s office list Pulte as the owner of the property and do not show any subsequent transfers.²² These records also indicate that the property is zoned for “Residential” and “Single Family” use.²³
16. According to 2022 annual reports filed with the Florida Secretary of State, Pulte is a director of the “Bill Pulte Foundation, Inc.,” a Florida not for profit corporation; the manager for “Pulte Capital Partners LLC,” a foreign limited liability company organized in Florida; and the manager and registered agent for “Pulte RE III LLC,” a Florida domestic limited liability company. On each company’s 2022 report, Pulte’s address is listed as “2377 E. Silver Palm Rd., Boca Raton, FL 33432”²⁴
17. A search of FEC disclosure records indicates that aside from the \$500,000 contribution to MAGA Again made in ML Organization’s name, there have been no other federal contributions associated with the property at “2377 E. Silver Palm Rd., Boca Raton, FL 33432” since 2016, when Pulte purchased it.

¹⁹ According to his personal website, Pulte is “CEO at Pulte Capital & The Blight Authority & Inventor of Twitter Philanthropy.” See <https://www.billpulte.org>. Pulte appears to have over three million followers on Twitter. “Pulte,” <https://twitter.com/pulte> (last visited Apr. 25, 2022).

²⁰ Warranty Deed (attached as Exhibit B).

²¹ *Id.*

²² Palm Beach County Property Appraiser, PAPA-Property Detail, <https://www.pbcgov.org/papa/Asps/PropertyDetail/PropertyDetail.aspx?parcel=06434729100080220> (attached as Exhibit C).

²³ *Id.*

²⁴ See “Bill Pulte Foundation, Inc.” 2022 Florida Not For Profit Corporation Annual Report (Apr. 7, 2022) (attached as Exhibit D); “Pulte Capital Partners LLC” 2022 Foreign Limited Liability Company Annual Report (Jan. 31, 2022) (attached as Exhibit E); “Pulte RE III LLC” 2022 Florida Limited Liability Company Annual Report (Jan. 21, 2022) (attached as Exhibit F).

18. According to FEC disclosure records, Pulte has made multiple political contributions, including, on September 13, 2019, a \$29,400 contribution to the Republican National Committee²⁵ and two contributions totaling \$5,600 — the statutory maximum amount for such contributions — to Donald J. Trump for President, Inc.²⁶ Pulte also contributed \$35,000 to Trump Victory, a joint fundraising committee, the same day.²⁷
19. In connection with these four contributions, the recipient committees each reported Pulte’s address as “150 East Palmetto Street, Boca Raton, FL 33432.” This address appears to be inaccurate,²⁸ but there is a “150 East Palmetto Park Road” in Boca Raton, Florida, which was previously listed as the principal place of business for Pulte Capital Partners, LLC, on its 2020 Annual Report.²⁹

SUMMARY OF THE LAW

Contributions in the Name of Another

20. FECA 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.”³⁰
21. The Commission regulation implementing the statutory prohibition provides the following examples of contributions in the name of another:

²⁵ Republican National Comm., Amend. 2020 March Monthly Report at 11,968 (July 29, 2020).

²⁶ Donald J. Trump for President, Inc., Amend. 2019 October Quarterly Report at 95,796–95,797 (May 7, 2020).

²⁷ Trump Victory, Amend. 2019 Oct. Quarterly Report at 805 (May 7, 2020).

²⁸ Google returns no results for “150 East Palmetto Street, Boca Raton, FL 33432” but redirects to “150 E Palmetto Park Rd., Boca Raton, FL 33432.” Google Search, <https://www.google.com/search?q=150+East+Palmetto+Street%2C+Boca+Raton%2C+FL+33432>.

²⁹ “Pulte Capital Partners LLC” 2020 Foreign Limited Liability Company Annual Report (Jan. 20, 2020) (attached as Exhibit G). On its 2022 annual report, the LLC appears to have changed its principal place of business to “230 South Dixie Highway, Boca Raton, FL 33432.” See Ex. E, *supra*.

³⁰ 52 U.S.C. § 30122.

- 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.”
 - 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.”³¹
22. The requirement that a contribution be made in the name of its true source promotes Congress’s objective of ensuring the complete and accurate disclosure by candidates and committees of the political contributions they receive,³² and ensures that the public and complainants are fully informed about the true sources of political contributions and expenditures. Such transparency also enables voters, including complainant Wieand, to have the information necessary to evaluate candidates for office, “make informed decisions[,] and give proper weight to different speakers and messages.”³³
23. FECA and Commission regulations provide that a person who furnishes another with funds for the purpose of contributing to a candidate or committee “makes” the resulting contribution, whether funds are advanced to another person to make a contribution in that

³¹ 11 C.F.R. § 110.4(b)(2)(i)-(ii).

³² *United States v. O’Donnell*, 608 F.3d 546, 553 (9th Cir. 2010) (“[T]he congressional purpose behind [Section 30122]—to ensure the complete and accurate disclosure of the contributors who finance federal elections—is plain.”); *Mariani v. United States*, 212 F.3d 761, 775 (3d Cir. 2000) (rejecting constitutional challenge to section 30122 in light of the compelling governmental interest in disclosure).

³³ *Citizens United v. FEC*, 558 U.S. 310, 369-71 (2010); see also Abby K. Wood, *Campaign Finance Disclosure*, 14 Ann. Rev. L. & Soc. Sci. 11, 19 (2018) (“Voters use heuristics, or informational shortcuts, to help them make the vote choice most aligned with their priorities without requiring encyclopedic knowledge . . . on every issue.”); Elizabeth Garrett & Daniel A. Smith, *Veiled Political Actors and Campaign Disclosure Laws in Direct Democracy*, 4 Election L.J. 295, 296 (2005) (finding that knowing the sources of election messaging is a “particularly credible” informational cue for voters).

person’s name or promised as reimbursement of a solicited contribution.³⁴ Moreover, the “key issue . . . is the source of the funds” and, therefore, the legal status of the funds when conveyed from a conduit to the ultimate recipient is “irrelevant to a determination of who ‘made’ the contribution for the purposes of [Section 30122].”³⁵

24. On April 1, 2016, then-Chair Petersen and then-Commissioners Hunter and Goodman “provide[d] clear public guidance on the appropriate standard that we will apply in future matters” pertaining to allegations that an LLC was used to facilitate a contribution in the name of another.³⁶ The Commissioners advised that “the proper focus in these matters is whether the funds used to make a contribution were intentionally funneled through a closely held corporation or corporate LLC for the purpose of making a contribution that evades the Act’s reporting requirements, making the individual, not the corporation or corporate LLC, the true source of the funds.”³⁷ The relevant factors that these Commissioners indicated they would consider included:

[whether] there is evidence indicating that the corporate entity did not have income from assets, investment earnings, business revenues, or bona fide capital investments, or was created and operated for the sole purpose of making political contributions.

³⁴ See *United States v. Boender*, 649 F.3d 650, 660 (7th Cir. 2011) (holding that to determine who made a contribution “we consider the giver to be the source of the gift, not any intermediary who simply conveys the gift from the donor to the donee.”); *O’Donnell*, 608 F.3d at 550, 555; *Goland v. United States*, 903 F.2d 1247, 1251 (9th Cir. 1990) (“[FECA] prohibits the use of ‘conduits’ to circumvent . . . [reporting] restrictions.”).

³⁵ *United States v. Whittemore*, 776 F.3d 1074, 1080 (9th Cir. 2015) (holding that defendant’s “unconditional gifts” to relatives and employees, along with the suggestion they contribute the funds to a specific political committee, violated Section 30122 because the source of the funds remained the individual who provided them to the putative contributors).

³⁶ Statement of Reasons of Chairman Matthew S. Petersen and Commissioners Caroline C. Hunter and Lee E. Goodman at 2, MURs 6485, 6487, 6488, 6711, 6930 (Apr. 1, 2016), <https://www.fec.gov/files/legal/murs/6487/16044391129.pdf>.

³⁷ *Id.*

These facts would suggest the corporate entity is a straw donor and not the true source of the contribution.³⁸

25. Straw donor contributions like those alleged here are serious violations of federal campaign finance law that have led to criminal indictments and convictions in recent years.³⁹ As explained in one such indictment, the straw donor ban works in tandem with other campaign finance laws to protect the integrity of our electoral system and to ensure that all candidates, campaign committees, federal regulators, and the public are informed of the true sources of money spent to influence federal elections.⁴⁰ Another recent indictment highlighted how straw donor schemes have been used to skirt FECA's source prohibitions, such as the ban on contributions by government contractors.⁴¹

CAUSE OF ACTION

COUNT I:

ML ORGANIZATION, LLC, WILLIAM PULTE, AND/OR THE UNKNOWN PERSON(S) WHO CONTRIBUTED TO MAKE AMERICA GREAT AGAIN, AGAIN! INC. IN THE NAME OF ML ORGANIZATION, LLC VIOLATED 52 U.S.C. § 30122

26. ML Organization has no documented activities or verifiable presence, as it has no website, social media account, or substantive online presence, despite being organized in April 2018.⁴² There is no record of it owning property of any kind, either in Palm Beach

³⁸ *Id.* at 12.

³⁹ See Colin Moynihan, *Lev Parnas, Ex-Giuliani Ally, Is Convicted of Campaign Finance Charges*, N.Y. Times (Oct. 22, 2021), <https://www.nytimes.com/2021/10/22/nyregion/lev-parnas-guilty-giuliani.html>; Dep't of Justice, *Lev Parnas and Igor Fruman Charged with Conspiring to Violate Straw and Foreign Donor Bans* (Oct. 10, 2019), <https://www.justice.gov/usao-sdny/pr/lev-parnas-and-igor-fruman-charged-conspiring-violate-straw-and-foreign-donor-bans>; Dep't of Justice, *Entertainer/Businessman and Malaysian Financier Indicted for Conspiring to Make and Conceal Foreign and Conduit Contributions During 2012 U.S. Presidential Election* (May 10, 2019), <https://www.justice.gov/opa/pr/entertainerbusinessman-and-malaysian-financier-indicted-conspiring-make-and-conceal-foreign>.

⁴⁰ Grand Jury Indictment, *United States v. Lev Parnas, et al.*, Cr. No. 19-725 (S.D.N.Y. Oct. 10, 2019), <https://www.justice.gov/usao-sdny/press-release/file/1208281/download>.

⁴¹ Dep't of Justice, *Former Government Contractor Executives Indicted for Unlawful Campaign Contributions* (Feb. 10, 2022), <https://www.justice.gov/opa/pr/former-government-contractor-executives-indicted-unlawful-campaign-contributions>.

⁴² See *supra* ¶ 11.

County, Florida, or anywhere else. This lack of any apparent activity supports the conclusion that it neither conducted any real business nor had sufficient income from real property holdings, assets, investment earnings, business revenues, or bona fide capital investments from which it could have made a \$500,000 contribution to an IEOPC, without an infusion of funds provided for that specific purpose.

27. William Pulte is the deeded owner of the property at “2377 E. Silver Palm Rd., Boca Raton, FL 33432,” the address disclosed on MAGA Again’s FEC disclosure report in connection with the \$500,000 contributed in ML Organization’s name.⁴³ Public records indicate that Pulte purchased the property in 2016, and there is no record of the property being sold to anyone else.⁴⁴
28. Pulte also lists “2377 E. Silver Palm Rd., Boca Raton, FL 33432” as his address on the 2022 annual reports for three Florida companies (two LLCs and a nonprofit corporation) for which he serves as a director, manager, or registered agent.⁴⁵
29. Property records indicate that “2377 E. Silver Palm Rd., Boca Raton, FL 33432” is zoned for single family residential use.⁴⁶
30. The fact that ML Organization’s reported address is a residential home, which Pulte owns and lists as his contact address in connection with his positions at multiple Florida companies, indicates that ML Organization is most likely owned and/or operated by Pulte or someone living in his household.
31. Pulte has made four contributions in his own name since 2016, for which he disclosed a different address, “150 East Palmetto Street, Boca Raton, FL 33432,” not the house at

⁴³ See *supra* note 20.

⁴⁴ See *supra* note 22.

⁴⁵ See Exs. D, E, F.

⁴⁶ See *supra* note 22.

“2377 E. Silver Palm Rd.” that he owns and uses as his address in connection with positions at three Florida companies.⁴⁷

32. There does not appear to be a 150 East Palmetto *Street* in Boca Raton, Florida, but 150 E. Palmetto *Park Rd.*, 8th Floor, Boca Raton, FL 33432 was the principal place of business for Pulte Capital Partners, LLC, a company managed by Pulte that listed the “2377 E. Silver Palm Rd.” residential address for him on its 2020 and 2022 annual reports.⁴⁸
33. Because Pulte previously identified the business address of one of his companies in connection with contributions made in his own name, the “2377 E. Silver Palm Rd.” residential address provided in connection with the contribution made in ML Organization’s name is not linked to Pulte on FEC reports. Nevertheless, public records establish that Pulte owns the property at 2377 E. Silver Palm Rd., and that address is identified as Pulte’s address on multiple companies’ 2022 annual reports.
34. The available facts, viewed as a whole, indicate that William Pulte and/or other unidentified persons used ML Organization as a straw donor to make a \$500,000 contribution to MAGA Again.
35. Accordingly, there is reason to believe that William Pulte and/or other person(s) who created, operated, and/or contributed through ML Organization violated 52 U.S.C. § 30122 by making a contribution in the name of another. Furthermore, there is reason to believe that ML Organization violated 52 U.S.C. § 30122 when it knowingly permitted its name to be used to effect a contribution of one or more other persons in its own name.

⁴⁷ See *supra* notes 25-27.

⁴⁸ See Exs. E, G.

PRAYER FOR RELIEF

36. Wherefore, the Commission should find reason to believe that ML Organization, LLC, and any person(s) who created, operated, and made contributions to or in the name of this entity (William Pulte and/or unknown person(s)) have violated 52 U.S.C. § 30101 *et seq.*, and conduct an immediate investigation under 52 U.S.C. § 30109(a)(2).
37. 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 FECA.

Respectfully submitted,

/s/ Saurav Ghosh
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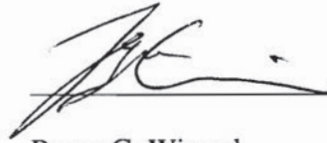
May 2, 2022

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 Roger G. Wieand



Roger G. Wieand

Sworn to and subscribed before me this 2 day of May 2022.



Notary Public



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



Saurav Ghosh, Esq.

Sworn to and subscribed before me this 2 day of May 2022.



Notary Public



EXHIBIT A

Department of State: Division of Corporations

[Allowable Characters](#)

HOME

Entity Details

THIS IS NOT A STATEMENT OF GOOD STANDING

File Number:	6836964	Incorporation Date / Formation Date:	4/9/2018 (mm/dd/yyyy)
Entity Name:	ML ORGANIZATION LLC		
Entity Kind:	Limited Liability Company	Entity Type:	General
Residency:	Domestic	State:	DELAWARE

REGISTERED AGENT INFORMATION

Name:	THE CORPORATION TRUST COMPANY		
Address:	CORPORATION TRUST CENTER 1209 ORANGE ST		
City:	WILMINGTON	County:	New Castle
State:	DE	Postal Code:	19801
Phone:	302-658-7581		

Additional Information is available for a fee. You can retrieve Status for a fee of \$10.00 or more detailed information including current franchise tax assessment, current filing history and more for a fee of \$20.00.

Would you like Status Status, Tax & History Information

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EXHIBIT B

CFN 20160240029
OR BK 28420 PG 0593
RECORDED 07/08/2016 09:01:44
Palm Beach County, Florida
AMT 985,000.00
Doc Stamp 6,895.00
Sharon R. Bock, CLERK & COMPTROLLER
Pgs 0593 - 598; (6pgs)

This Instrument Prepared by & Return to:
Holly Gayle Gershon, Esquire
1489 W. Palmetto Park Road, Suite 497
Boca Raton, Florida 33486
Telephone: (561) 394-8858

Property Identification No.: 06 43 47 29 10 008 0220

WARRANTY DEED

THIS INDENTURE, made this 7th day of June, 2016, between **MARK T. PULTE**, a married man, individually and **JULIE PULTE**, husband and wife and **MARK T. PULTE**, as **TRUSTEE OF THE MARK T. PULTE, LIVING TRUST DATED 12/20/00** with full power to protect, conserve, sell, lease, encumber, and/or to otherwise manage and/or dispose of the subject property, as well as any and all additional powers and authority to convey pursuant to Florida Statute 689.071, whose post office address is 41 SE 5th Street, 2d Floor, Boca Raton, Florida, Grantor**, and **WILLIAM JOHN PULTE**, a single man, whose post office address is 2377 East Silver Palm Road, Boca Raton, Florida 33432, Grantee*.

WITNESSETH, that said Grantor, for and in consideration of the sum of Ten Dollars (\$10.00) and other good and valuable considerations to said Grantor in hand paid by said Grantee, the receipt whereof is hereby acknowledged, has granted, bargained and sold to the said Grantee, and Grantee's heirs and assigns forever, the following described land situate, lying and being in Palm Beach County, Florida, to wit:

Lot 22, Block 8, Royal Palm Yacht and Country Club, according to the map or plat thereof as recorded in Plat Book 26, Page 57, Public Records of Palm Beach County, Florida.

SUBJECT TO existing zoning and other governmental regulations, restrictions and matters appearing on the Plat of records and/or common to the subdivision, if any, however, none of which are re-imposed hereby, taxes for the year 2016 and subsequent years.

Together with all the tenements, hereditaments and appurtenances thereto belonging or in anywise appertaining, to have and to hold, the same in fee simple forever.

Said Grantor does hereby fully warrant the title to said land and will defend the same against the lawful claims of all persons whomsoever.

** (Wherever used herein, the terms "Grantor" and "Grantee" shall include singular and plural, heirs, legal representatives, and assigns of individuals, and the successors and assigns of corporations, wherever the context so admits or requires.)

IN WITNESS WHEREOF, Grantor has hereunto set Grantor's hand and seal the day and year first above written.

Signed, sealed and delivered in our presence:

[Signature]
Witness #1 Signature:

[Signature]
Mark T. Pulte Individually and as Trustee of the Mark T. Pulte Living Trust dated 12/20/00

George Bariso
Witness #1 Print Name

[Signature]
Witness #2 Signature

Leslie A. Romero Becker
Witness #2 Print Name

[Signature]
Witness #1 Signature

[Signature]
Julie Pulte

George Bariso
Witness #1 Print Name

[Signature]
Witness #2 Signature

Leslie A. Romero Becker
Witness #2 Print Name

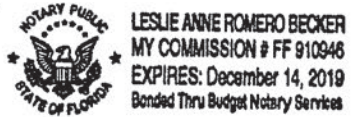
STATE OF Florida

COUNTY OF Palm Beach

I HEREBY CERTIFY that on this day before me, an officer duly qualified to take acknowledgments, personally appeared Mark T. Pulte to me known to be the person described in and who executed the foregoing instrument who acknowledged and swore before me that he executed the same, and who is personally known to me.

WITNESS my hand and official seal in the County and State last aforesaid this 7th day of June, 2016.

[Signature]
Notary Public
County of Palm Beach State of Florida
Commission No. FF 910 946
My Commission expires: 12-14-19




STATE OF Florida

COUNTY OF Palm Beach

I HEREBY CERTIFY that on this day before me, an officer duly qualified to take acknowledgments, personally appeared Julie Pulte to me known to be the person described in and who executed the foregoing instrument who acknowledged and swore before me that she executed the same, and who is personally known to me.

WITNESS my hand and official seal in the County and State last aforesaid this 7th day of June, 2016.



Notary Public
County of Palm Beach, State of Florida
Commission No. FF 910 946
My Commission expires 12-14-19



Certified copy

MUR799400022

AFFIDAVIT

**STATE OF FLORIDA
COUNTY OF PALM BEACH**

BEFORE ME the undersigned authority, on this day appeared Monica H. Sims who being by me duly sworn on his oath, deposes and says:

That he/she is the Assistant Secretary of the **ROYAL PALM IMPROVEMENT ASSOCIATION, INC.** a corporation not for profit, organized and existing under the Laws of the State of Delaware.

That as such Officer of said Association; he/she has charge of the records of such Association and of the membership rolls containing the names of all members of such Association;

That such records show that the following person has been accepted for membership in the **ROYAL PALM IMPROVEMENT ASSOCIATION, INC.** on the date set opposite his/her name as set forth below:

Date Accepted: June 8, 2016

Name: William H John Pulte

Lot #22 Block #08
Royal Palm Yacht and
Country Club Subdivision


Assistant Secretary

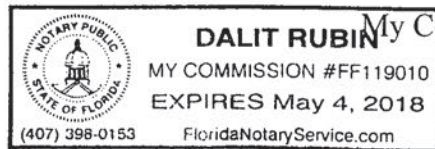
**STATE OF FLORIDA
COUNTY OF PALM BEACH**

**SWORN TO AND SUBSCRIBED BEFORE ME THIS 8th DAY OF
June, 2016 A.D.**

(Personally Known)


Notary Public

(Seal)



**CERTIFICATE
RELEASE OF OPTION**

ROYAL PALM IMPROVEMENT ASSOCIATION, INC., A Delaware Corporation not for profit hereby certifies as follows:

1. Pursuant to Paragraph 11 of those certain restrictions dated May 28, 1959 recorded in Official Record Book 356, Page 190 of the Public Records of Palm Beach County, Florida and as assigned and conveyed to the Royal Palm Improvement Association, Inc. a Delaware Corporation not for profit, in O.R. Book 2097, Page 871.

Mark T. Pulte, Trustee of the Mark T. Pulte Living Trust

Advised the undersigned of the proposed purchase of the following described land to:

William John Pulte

At a purchase price of: Nine hundred and eighty five thousand and NO/00 dollars.-
(\$985,000.00)

And, as required by said Paragraph 11, offered such land for purchase by the undersigned at such purchase price.

Lot #22 in Block #08 of the **ROYAL PALM YACHT & COUNTRY CLUB SUBDIVISION**, according to the plat thereof recorded in Plat Book 26 at Pages 57 through 62, inclusive, of the Public Records of Palm Beach County, Florida, said lands lying and being in Palm Beach County, Florida.

2. The undersigned does not wish to exercise its option to purchase said lands and hereby waives its option to repurchase the same pursuant to the above described restrictions, effective upon the execution and delivery of a deed conveying the above described property to:

William John Pulte

Reserving, nevertheless, the right retained in said restrictions insofar as same shall apply to any subsequent conveyance of the real property described above.

3. The membership rolls of the undersigned show that the person(s) named in Paragraph 2, above, have been accepted for membership on
4. The waiver and release of option evidenced by this Certificate are expressly conditioned upon the person(s) named in Paragraph 2 acceptance of and agreement to be bound by all of the terms and conditions contained in that certain Declaration of Restrictions, Limitations, Conditions and Agreements relative to Royal Palm Yacht & Country Club Subdivision dated May 29, 1959, which was recorded in Official Records Book 356 at Page 190, and was further amended or affected by those documents recorded in Official Records Book 368 at Page 206, in Official Records Book 1030 at Page 217, in Official Records Book 2097 at Page 871, in Official Records Book 2268 at Page 515, Official Records Book 3174 at Page 891, together with the Articles of Incorporation, the Bylaws, including those recorded at Official Records Book 6143 at Page 1267 and Official Records Book 8764 at Page 1589, as applicable, and all future amendments to any of the foregoing, all recorded in the Public Records of Palm Beach County, Florida.

IN WITNESS WHEREOF, the undersigned corporation has caused this instrument executed by its duly authorized President and Assistant Secretary and its corporate seal to be hereunto affixed this the 8th Day of June, 2016.

ROYAL PALM IMPROVEMENT ASSOCIATION, INC.

Attest:

[Signature]
Assistant Secretary

By: *[Signature]*
President

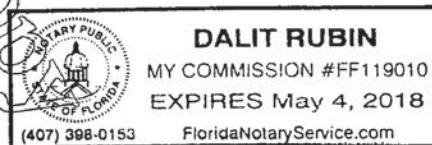
STATE OF FLORIDA)
COUNTY OF PALM BEACH)

Before me, the undersigned authority, personally appeared Rick DuPuis and Monica H. Sims to Me personally known, and known to me to be the President and the Assistant Secretary respectively of ROYAL PALM IMPROVEMENT ASSOCIATION, INC., they acknowledge to and before me that they executed the foregoing instrument as such officer and secretary and that they affixed thereto the corporate seal of said corporation, and that the foregoing instrument is the act and deed of said corporation.

IN WITNESS THEREOF, I have hereunto set my hand and seal in the State and County aforesaid on this the 8th day of June, 2016.

My Commission expires:

[Signature] Notary Public



This is Not Certified Copy

EXHIBIT C

Location Address 2377 E SILVER PALM RD
Municipality BOCA RATON
Parcel Control Number 06-43-47-29-10-008-0220
Subdivision ROYAL PALM YACHT & COUNTRY CLUB SUB
Official Records Book 28420 **Page**593
Sale Date JUN-2016
Legal Description ROYAL PALM YACHT & CNTRY CLUB LT 22 BLK 8

Owners

PULTE WILLIAM J

Mailing address

2377 E SILVER PALM RD
 BOCA RATON FL 33432 7956

Sales Date	Price	OR Book/Page	Sale Type	Owner
JUN-2016	\$985,000	28420 / 00593	WARRANTY DEED	PULTE WILLIAM J
FEB-2012	\$10	25039 / 00057	QUIT CLAIM	PULTE MARK T
JUN-2011	\$10	24574 / 01566	QUIT CLAIM	PULTE MARK T &
JUN-2010	\$700,000	23992 / 00466	WARRANTY DEED	PULTE MARK T
DEC-2005	\$0	19715 / 00827	QUIT CLAIM	PULTE NOREEN C

1 2

Exemption Applicant/Owner	Year	Detail
PULTE WILLIAM J	2022	

Number of Units 1	*Total Square Feet 4141	Acres 0.2668
Use Code 0100 - SINGLE FAMILY	Zoning R-1-A - RESIDENTIAL (LOW) (06-BOCA RATON)	

Tax Year	2021	2020	2019
Improvement Value	\$268,464	\$67,565	\$52,706
Land Value	\$1,459,420	\$1,272,000	\$1,260,000
Total Market Value	\$1,727,884	\$1,339,565	\$1,312,706

All values are as of January 1st each year

Tax Year	2021	2020	2019
Assessed Value	\$1,327,542	\$1,309,213	\$1,279,778
Exemption Amount	\$50,000	\$50,000	\$50,000
Taxable Value	\$1,277,542	\$1,259,213	\$1,229,778

Tax Year	2021	2020	2019
Ad Valorem	\$23,240	\$22,914	\$22,687
Non Ad Valorem	\$323	\$318	\$320
Total tax	\$23,563	\$23,232	\$23,007

EXHIBIT D

2022 FLORIDA NOT FOR PROFIT CORPORATION ANNUAL REPORT

MUR799400028

DOCUMENT# N21000013627

FILED
Apr 07, 2022
Secretary of State
4442389034CC

Entity Name: BILL PULTE FOUNDATION, INC.

Current Principal Place of Business:

230 SOUTH DIXIE HIGHWAY
BOCA RATON, FL 33432

Current Mailing Address:

230 SOUTH DIXIE HIGHWAY
BOCA RATON, FL 33432

FEI Number: 87-3809874

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

CORPORATION SERVICE COMPANY
1202 HAYS STREET
TALLAHASSEE, FL 32301 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: _____

Electronic Signature of Registered Agent

_____ Date

Officer/Director Detail :

Title D
Name PULTE, WILLIAM J
Address 2377 E. SILVER PALM RD.
City-State-Zip: BOCA RATON FL 33432

Title D
Name GALATI, RACHAEL
Address 800 FRANKLIN RD, UNIT 25
City-State-Zip: LEBANON OH 45036

Title S
Name PULTE, DIANA
Address 2377 E. SILVER PALM RD.
City-State-Zip: BOCA RATON FL 33432

Title D
Name PULTE, DIANA
Address 2377 E. SILVER PALM RD.
City-State-Zip: BOCA RATON FL 33432

Title P
Name PULTE, WILLIAM J
Address 2377 E. SILVER PALM RD.
City-State-Zip: BOCA RATON FL 33432

Title T
Name GALATI, RACHAEL
Address 800 FRANKLIN RD., UNIT 26
City-State-Zip: LEBANON OH 45036

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: RACHAEL GALATI

AUTHORIZED SIGNER

04/07/2022

Electronic Signature of Signing Officer/Director Detail

Date

EXHIBIT E

2022 FOREIGN LIMITED LIABILITY COMPANY ANNUAL REPORT

MUR799400030

DOCUMENT# M16000004611

FILED
Jan 31, 2022
Secretary of State
5671471964CC

Entity Name: PULTE CAPITAL PARTNERS LLC

Current Principal Place of Business:

230 SOUTH DIXIE HIGHWAY
BOCA RATON, FL 33432

Current Mailing Address:

230 SOUTH DIXIE HIGHWAY
ATTN: ROBB BAUBIE
BOCA RATON, FL 33432 US

FEI Number: 45-2962554

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

CORPORATION SERVICE COMPANY
1201 HAYS STREET
TALLAHASSEE, FL 32301-2525 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: _____

Electronic Signature of Registered Agent

_____ Date

Authorized Person(s) Detail :

Title MGR
Name PULTE, WILLIAM J
Address 2377 EAST SILVER PALM ROAD
City-State-Zip: BOCA RATON FL 33432

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 605, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: WILLIAM PULTE

AUTHORIZED SIGNATURE 01/31/2022

_____ Electronic Signature of Signing Authorized Person(s) Detail

_____ Date

EXHIBIT F

2022 FLORIDA LIMITED LIABILITY COMPANY ANNUAL REPORT

MUR799400032

DOCUMENT# L19000171628

FILED
Jan 21, 2022
Secretary of State
1487288463CC

Entity Name: PULTE RE III LLC

Current Principal Place of Business:

230 SOUTH DIXIE HIGHWAY
BOCA RATON, FL 33432

Current Mailing Address:

230 SOUTH DIXIE HIGHWAY
BOCA RATON, FL 33432 US

FEI Number: 84-2391885

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

PULTE, WILLIAM J
2377 E SILVER PALM ROAD
BOCA RATON, FL 33432 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: _____

Electronic Signature of Registered Agent

_____ Date

Authorized Person(s) Detail :

Title MGR
Name PULTE, WILLIAM J
Address 2377 E SILVER PALM ROAD
City-State-Zip: BOCA RATON FL 33432

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 605, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: WILLIAM PULTE

AUTHORIZED SIGNER

01/21/2022

_____ Electronic Signature of Signing Authorized Person(s) Detail

_____ Date

EXHIBIT G

2020 FOREIGN LIMITED LIABILITY COMPANY ANNUAL REPORT

MUR799400034

DOCUMENT# M16000004611

FILED
Jan 20, 2020
Secretary of State
0728425062CC

Entity Name: PULTE CAPITAL PARTNERS LLC

Current Principal Place of Business:

150 E. PALMETTO PARK RD.
8TH FLOOR
BOCA RATON, FL 33432

Current Mailing Address:

321 N. CLARK STREET, SUITE 500
ATTN: ROBB BAUBIE
CHICAGO, IL 60654 US

FEI Number: 45-2962554

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

CORPORATION SERVICE COMPANY
1201 HAYS STREET
TALLAHASSEE, FL 32301-2525 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE:

Electronic Signature of Registered Agent

Date

Authorized Person(s) Detail :

Title MGR
Name PULTE, WILLIAM J
Address 2377 EAST SILVER PALM ROAD
City-State-Zip: BOCA RATON FL 33432

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 605, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: WILLIAM PULTE

MANAGER

01/20/2020

Electronic Signature of Signing Authorized Person(s) Detail

Date