

**MEYER, BLOHM AND POWELL, P.A.**

ATTORNEYS AT LAW

RECEIVED

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2023 MAR 27 AM 8:50

FLORIDA ELECTIONS  
TALLAHASSEE, FL

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JENNIFER S. BLOHM  
MARTIN F. POWELL  
STEPHANIE M. SCHAAP

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LYNN T. THOMAS, FRP  
PARALEGAL

March 24, 2023

**VIA E-Mail: [Tim.Vaccaro@myfloridalegal.com](mailto:Tim.Vaccaro@myfloridalegal.com)**

Mr. Tim Vaccaro, Executive Director  
Florida Elections Commission  
107 West Gaines Street  
Collins Building, Suite 224  
Tallahassee, Florida 32399

Re: Notice of Appeal – Automatic Fines for Multiple Political Committees

Dear Mr. Vaccaro:

Please take notice that our office represents the below listed political committees which by letters dated March 8, 2023, and March 10, 2023, (attached as Exhibit A) have been assessed automatic fines for the 2022 G6 campaign treasurer's report that was due on November 4, 2022.

The Committees appeal the fines which have been imposed and request an opportunity to present argument at a hearing before the Commission as authorized by Rules 2B-1.005 and 2B-1.055, Florida Administrative Code.

The Committees have the same treasurer, Jason Blank, and the reason for the automatic fines and the appeals is the same for all the Committees. The Committees are:

- South Florida Accountability Project
- Latino Rising
- Representative Democracy<sup>1</sup>
- Voters for Truth PC
- Building Stronger Communities
- Activate Florida PC

<sup>1</sup> The reason for the automatic fine is the same for the committee, Representative Democracy, as the other committees. However, the daily report that was timely filed also has been amended to correct a bank credit that was incorrectly reported as an expenditure (\$21.07).

Mr. Tim Vaccaro, Executive Director  
March 24, 2023  
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- Broward Victory PC, Inc.
- Putting Community First
- Defending Florida
- City Wise Florida, Inc.
- Florida Ground Game
- A Sunny Tomorrow, Inc.
- Making Florida Better
- Winning Florida
- Getting Things Done PC
- Citizens for Community Care
- Democratic Strategies Network
- Blank PC
- Florida Policyholders Cooperative
- Voter Accountability Project
- Voters For Orderly And Transparent Elections
- People For A United Florida
- Responsibility In Florida
- Growing A Safer Florida
- Dolphin Dems PC

The basis for the appeals is that the Committees contend that their 2022 G6 reports were timely filed, and therefore, no fines should be imposed. Mr. Blank, as the treasurer for the Committees, hired Yolanda Brown of Brown Financial and Consulting Services Group LLC to assist him with filing the campaign reports for the Committees. Ms. Brown timely filed the daily reports due for the Committees during the 2022 election cycle. She, then, timely filed a waiver for each of the Committees for the 2022 G6 report on November 4, 2022. However, Ms. Brown second guessed her decision to file the waivers instead of re-reporting the contributions and expenditures she had reported on the daily reports. Therefore, she filed amendments to the 2022 G6 reports and re-reported the contributions and expenditures that she had already timely reported on the daily reports. The amendments to the waiver reports generated the automatic fines at issue in this appeal.

The filing of the amendments was in error. She should not have re-reported the contributions and expenditures (results in incorrect duplicate reporting). The initial, timely filed waivers were correct. The amendments have now been deleted, and the reporting is now correct. Based on these facts which are verified in the attached Declaration by Ms. Brown (attached as Exhibit B), the Committees respectfully request that the automatic fines be removed from all the Committees since the 2022 G6 reports were timely filed (the initial waivers).

Mr. Tim Vaccaro, Executive Director

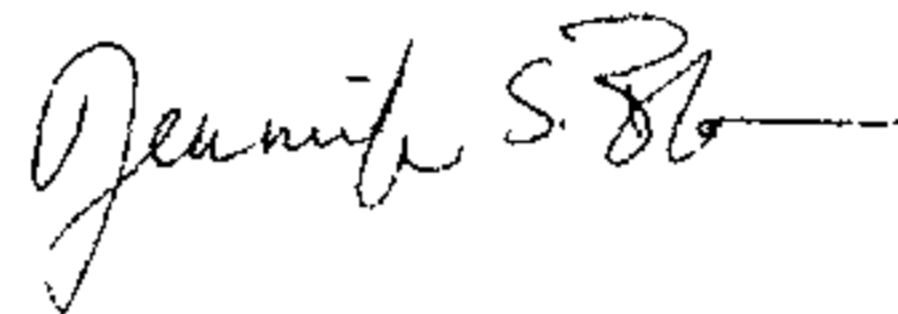
March 24, 2023

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If any further steps are required to perfect this appeal, please notify me at once. We request that further communication relating to this matter be directed through this office.

Thank you, in advance, for your cooperation.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer S. Blohm". The signature is written in black ink and includes a horizontal line at the end.

Jennifer S. Blohm

JSB/ltt

Attachments

cc: Mr. Jason Blank, Treasurer  
Ms. Donna Malphurs, Clerk FEC  
Ms. Donna Brown, Division of Elections

## **DECLARATION BY YOLANDA BROWN**

1. My name is Yolanda Brown. I am over the age of 18 and have personal knowledge of the facts set forth in this declaration.

2. I am the CEO of Brown Financial and Consulting Services Group LLC. I provide compliance services to several political committees in Florida. Jason Blank, as treasurer, hired me to assist him with filing the campaign reports for the following political committees:

- South Florida Accountability Project
- Latino Rising
- Representative Democracy
- Voters for Truth PC
- Building Stronger Communities
- Activate Florida PC
- Broward Victory PC, Inc.
- Putting Community First
- Defending Florida
- City Wise Florida, Inc.
- Florida Ground Game
- A Sunny Tomorrow, Inc.
- Making Florida Better
- Winning Florida
- Getting Things Done PC
- Citizens for Community Care
- Democratic Strategies Network
- Blank PC
- Florida Policyholders Cooperative
- Voter Accountability Project
- Voters for Orderly and Transparent Elections
- People for a United Florida
- Responsibility In Florida
- Growing a Safer Florida
- Dolphin Dems PC

3. For each of these committees, I timely filed the 2022 daily reports (D1-D6) reporting the contributions and expenditures for each committee. On November 4, 2022, I timely

filed the committees' 2022 G6 report. The G6 report includes the same time period as the daily reports. For each committee, the G6 report was a waiver.

4. Later, I second guessed my decision to file the waiver reports and determined that I needed to file amendments to the 2022 G6 reports listing the contributions and expenditures for each committee that I had already reported on the daily reports. I filed the amendments for each of the committees.

5. When Mr. Blank began receiving the automatic fine letters and spoke to me about what happened, I realized that the amendments were filed in error and the initial, timely filed waiver reports were correct.

6. I have removed the incorrectly filed amendments so that the committees' reporting is correct and reflects a waiver for the 2022 G6 reports.

Under penalties of perjury, I declare that I have read the foregoing and the facts stated in it are true.

Dated this 23 day of March, 2023.

*Yolanda Brown*  
\_\_\_\_\_  
Yolanda Brown



FLORIDA DEPARTMENT OF STATE

**Cord Byrd**  
Secretary of State

DIVISION OF ELECTIONS

March 8, 2023

Jason H. Haber, Chairperson  
South Florida Accountability Project  
Post Office Box 30265  
Fort Lauderdale, FL 33303-3303

PAC 73747

Dear Mr. Haber:

The campaign treasurer's report that was due on November 4, 2022, was filed on January 3, 2023. By law, you are automatically assessed a late fine of \$25,000.00.

**You have 20 days from the receipt of this notice to either:**

1. Pay the fine to the Florida Division of Elections (For a candidate only, a fine is not an allowable campaign expenditure and must be paid from personal funds) at:

*Florida Division of Elections  
R.A. Gray Building, Room. 316  
500 South Bronough Street  
Tallahassee, Florida 32399-025011*

2. Appeal the fine to the Florida Elections Commission (See Rules 2B-1.005 and 2B-1.0055, Florida Administrative Code) at:

*Florida Elections Commission  
107 West Gaines Street, Ste. 224  
Tallahassee, Florida 32399-0150*

If you appeal, please send a copy also to the Florida Division of Elections so that you will not receive further notices from the Division about this matter.

If you have any questions, please contact the help desk at (850) 245-6280.

Sincerely,

A handwritten signature in black ink that reads "Donna S. Brown".

Donna S. Brown, Chief  
Bureau of Election Records

EXHIBIT A