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FEDERAL BUREAU OF INVESTIGATION

Date of entry 08/17/2016

BARRY MOLINE, Executive Director of FLORIDA MUNICIPAL ELECTRIC ASSOCIATION (FMEA) was interviewed via telephone. MOLINE can be reached at The second second and the second second

MOLINE was advised that FMEA's Political Action Committee (PAC) made a contribution to REGINALD FULLWOOD's campaign in July 2010 for \$500, and was asked to explain the process under which the PAC makes political contributions. MOLINE stated that there is a team of four individuals that manage the PAC for FMEA. MOLINE is one of those four individuals. The Board of Directors delegates the authority to decide on campaign contributions to the four individuals. There are three criteria the candidate must meet in order for the PAC to make a contribution to their campaign:

- 1. Does a member of the FMEA reside in the district of the candidate?
- 2. Is the candidate on a committee of industry jurisdiction for FMEA?
- 3. Is the candidate associated with legislative leadership?

The PAC makes contributions to candidates for campaign expenses only. MOLINE is aware of the legal guidelines for campaign contributions and advised that the PAC would "absolutely not" have contributed to REGINALD FULLWOOD's campaign if they had known he would use the funds for personal use.

The PAC receives requests for campaign contributions in writing, via email and via telephone. MOLINE advised that he would research how the request for FULLWOOD's contribution came in and provide any records available.

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DAVID HART, Executive Vice President of the Florida Chamber of Commerce, was interviewed via telephone. After being advised of the identity of the interviewing Agents and the nature of the interview, HART provided the following information:

HART is one of the officers of the Florida Chamber of Commerce that manages the Political Action Committee (PAC). HART was on the Board of Directors for five or six years in the early 2000s. He became the Executive Vice President in 2010. HART was asked about a campaign contribution to REGGIE FULLWOOD's campaign for a seat at the Florida House of Representatives for \$500 on October 5, 2010. HART said the Florida Chamber of Commerce PAC used to be a Committee of Continuous Existence (CCE) back in 2010 and was changed to a PAC a couple years later.

The purpose of the contribution to REGGIE FULLWOOD's campaign was not for FULLWOOD's personal use, but was for his campaign for legitimate The Florida Chamber of Commerce PAC (and formerly CCE) campaign expenses. abides by the Florida Statutes on campaign finance and is only contributing to individual campaigns for the sole purpose of supporting the campaign activities. The contribution was made with the understanding the candidate would use the funds for campaign expenses as authorized by Florida law.

For a CCE, the law required that a Board of Directors had to approve the contribution to a campaign. Under the new law that governs the PAC, the contribution does not have to be approved by a Board of Directors but the Florida Chamber of Commerce Chief Financial Officer (CFO), Chief Executive Officer (CEO), and himself serve as a Board of Directors and decide which campaigns to make contributions to.

HART said he would see if he could find board minutes in which the contribution to FULLWOOD's campaign was approved in 2010. HART's phone number is

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JUSTIN THAMES, Director of Governmental Affairs for the Florida Institute of CPAs, was interviewed via telephone. After being advised of the identity of the interviewing Agents and the nature of the interview, THAMES provided the following information:

THAMES manages the Florida CPA Political Action Committee (PAC). THAMES has been in his position with the Florida Institute of CPAs for five years. THAMES was asked about a contribution made from the PAC to REGGIE FULLWOOD's campaign on October 12, 2010 for \$500. THAMES said the contribution was made to FULLWOOD's campaign to support authorized campaign activities and expenses as authorized by Florida statute or law. When a contribution is made from the PAC to any campaign, it is with the understanding the campaign would use it only as authorized by state law. A campaign contribution that is made to an individual campaign is not intended for the candidate's personal use. Therefore the contribution made to FULLWOOD's campaign was not for his personal use.

There is a Board of Directors that approves campaign contributions. Many times, someone from the Board of Directors participated in an interview or questionnaire with the candidate. Sometime a candidate will contact the PAC directly and ask for a campaign contribution. THAMES is unsure how the contribution to FULLWOOD's campaign was initiated and approved. THAMES said he would check with his compliance officers and see if there is anything they can provide regarding the approval of the contribution to FULLWOOD's campaign. THAMES phone number is

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MARGIE GRANT, Vice President and General Counsel FLORIDA REALTORS POLITICAL ACTION COMMITTEE (PAC), was interviewed via telephone and can be reached at **Commercial Constitute**. After being advised of the identity of the interviewing Agent and the nature of the interview, GRANT provided the following information:

GRANT was advised of a contribution made to REGINALD FULLWOOD's campaign in September 2010, in the amount of \$500, and was asked to discuss the process under which campaign contributions are made. GRAND advised that there is a Board of Trustees that votes on all campaign contributions that are made. GRANT is aware that Florida law states the maximum amount allowed is \$500. GRANT stated that the PAC would "absolutely not" have contributed to FULLWOOD's campaign if they had know he would use the funds for personal use because it is illegal.

GRANT advised that she will conduct research for any records related to this campaign contribution and provide anything that is available.

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RON MEYER, attorney for FLORIDA EDUCATION ASSOCIATION (FEA)ADVOCACY FUND, was interviewed via telephone. MEYER can be reached at After being advised of the identity of the interviewing Agent and the nature of the interview, MEYER provided the following information:

MEYER was advised of a campaign contribution made to REGINALD FULLWOOD in September 2011, for \$500, by the FEA ADVOCACY FUND and was asked to discuss the process under which campaign contributions are made by the fund. MEYER advised that during that time period, the fund was considered a COMMITTEE for CONTINUED EXISTENCE (CCE) and was governed by particular bi-laws. The CCE made campaign contributions for the purpose of influencing the outcome of an election. The process includes a local entity, such as DUVAL TEACHERS UNITED, making a recommendation to the state CCE for a contribution to a particular candidate. MEYER can guarantee that the contributions made through FEA are not for personal use. If there were any suggestion the contribution would be used for personal use, the CCE would not have made the contribution.

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