

STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION
107 West Gaines Street, Suite 224, Tallahassee, Florida 32399-1050
Telephone Number: (850) 922-4539
www.fec.state.fl.us

CONFIDENTIAL COMPLAINT FORM

The Commission's records and proceedings in a case are confidential until the Commission rules on probable cause. A copy of the complaint will be provided to the person against whom the complaint is brought.

1. PERSON BRINGING COMPLAINT:

Name: Alfred Zucaro, Jr. Work Phone: ()
Address: 561 Golden Harbour Drive Home Phone: (561) 644-1665
City: Boca Raton County: Palm Beach State: FL Zip Code: 33432

2. PERSON AGAINST WHOM COMPLAINT IS BROUGHT:

A person can be an individual, political committee, committee of continuous existence, political party, electioneering communication organization, club, corporation, partnership, company, association, or any other type of organization. (If you intend to name more than one individual or entity, please file multiple complaints.)

Name of individual or entity: FORBOCA.ORG, Inc.
Address: 2618 Centennial Place Phone: ()
City: Tallahassee County: Leon State: FL Zip Code: 32308

If individual is a candidate, list the office or position sought: _____

Have you filed this complaint with the State Attorney's Office? (check one) ☐ Yes ☒ No

3. ALLEGED VIOLATION(S):

Please list the provisions of The Florida Election Code that you believe the person named above may have violated. The Commission has jurisdiction only to investigate the following provisions: **Chapter 104, Chapter 106, and Section 105.071, Florida Statutes.** Also, please include:

- ✓ The facts and actions that you believe support the violations you allege,
- ✓ The names and telephone numbers of persons you believe may be witnesses to the facts,
- ✓ A copy or picture of the political advertisements you mention in your statement,
- ✓ A copy of the documents you mention in your statement, and
- ✓ Other evidence that supports your allegations.

Florida Statute 106.03(1)(a) - Registration of political committees and electioneering communications organizations

See attached facts and documentation.

Additional materials attached (check one)? ☒ Yes ☐ No

4. OATH

STATE OF FLORIDA

COUNTY OF Palm Beach

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

[Signature]

Original Signature of Person Bringing Complaint

Sworn to and subscribed before me this 20 day of April, 20 17

[Signature]

Signature of Officer Authorized to Administer Oaths or Notary public.



Theresa Berube
NOTARY PUBLIC
STATE OF FLORIDA
Comm# FF200755
Expires 2/27/2019

(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally known _____ Or Produced Identification ☒

Type of Identification Produced FL DL 2260-000-49-244-0

Any person who files a complaint while knowing that the allegations are false or without merit commits a misdemeanor of the first degree, punishable as provided in Sections 775.082 and 775.083, Florida Statutes.

Statement of Facts:

In March 2016, a not-for-profit corporation, FORBOCA.ORG, Inc., filed Articles of Incorporation with the Florida Department of State, Division of Corporations (see Exhibit 1).

Since then, FORBOCA.ORG, Inc. has been operating as a **political committee**, but has never registered as such.

Florida Statute 106.011(16)(a)(1)(a) states, a “**political committee**’ means a combination of two or more individuals, or a **person** other than an individual, that, in an aggregate amount in excess of \$500 during a single calendar year, accepts contributions for the purpose of making contributions to any candidate, **political committee**, affiliated party committee, or political party.”

Florida Statute 106.011 (14) states, a “**person**’ means an individual or a **corporation**, association, firm, partnership, joint venture, joint stock company, club organization, estate, trust, business trust, syndicate, or other combination of individuals having collective capacity.”

Florida Statute 106.03(1)(a) states, “each political committee that **receives contributions or makes expenditures during a calendar year in an aggregate amount exceeding \$500** or that seeks the signatures of registered electors in support of an initiative shall file a statement of organization as provided in subsection (3) within 10 days after its organization.

FORBOCA.ORG, Inc. has been operating as a shell corporation, accepting contributions for the purpose of making contributions to political committees. By doing so, it has circumvented the reporting requirements of a political committee, shielding its contributors from public disclosure.

Since September 2016, FORBOCA.ORG, Inc. has made \$191,750 in campaign contributions to various political committees.

In calendar year 2016, FORBOCA.ORG, Inc. contributed \$64,500 to Protecting Coastal Communities PAC and \$250 to Mark PC PAC (see Exhibit 2).

So far in 2017, FORBOCA.ORG, Inc. has made \$127,000 in campaign contributions to GoBoca PAC (see Exhibit 3).

Because FORBOCA.ORG, Inc. has never filed as a political committee, the identity of their contributors has never been disclosed.

FORBOCA.ORG, Inc. is not a legitimate going business concern. It has a basic website that has published approximately a half dozen articles in the past year about a local referendum and several local candidates.

FORBOCA.ORG, Inc. has no employees. It exists only on paper.

FORBOCA.ORG, Inc. engages in no community activities.

FORBOCA.ORG, Inc. solicits no funds from the general public, not even on its website, yet has made \$191,750 in campaign contributions to political committees.

FORBOCA.ORG, Inc. should have registered as a political committee. Instead, it has been operating as a money laundering venture to shield the identity of political contributors while funneling large sums of unaccounted for funds to political committees.

The actions of the corporation are willful. All of the principals (see attached) have years of experience and familiarity with Florida's election laws.

FORBOCA.ORG, Inc. Chairperson Michael Mullaugh is a former longtime Boca Raton City Councilman.

FORBOCA.ORG, Inc. Officer Mark Guzzetta is the former Chairperson of Blue Lake for Responsible Development PAC and the former Treasurer for GoBoca ECO and Boca Citizens for Prosperity CCE.

FORBOCA.ORG, Inc. Officer Mark Herron is a Tallahassee attorney with the law firm of Messer Caparella, P.A. He specializes in Florida election law and is no stranger to the Elections Commission.

Former FORBOCA.ORG, Inc. Officer Albert "Al" Trivasos is a former Boca Raton City Councilman and the former Chairperson of Boca Area Commerce PAC, Inc. and Boca Raton Area Commerce PAC CCE. He served as an Officer until March 30, 2017 (see Exhibit 1).

Former FORBOCA.ORG, Inc. Officer Murray J. "Mike" Arts is a former Boca Raton City Councilman. He served as an Officer until April 11, 2017 (see Exhibit 1).