

LAW OFFICES
RICHARDSON & TYNAN, P.L.C.
8142 NORTH UNIVERSITY DRIVE
TAMARAC, FLORIDA 33321

KEVIN P. TYNAN
NOLA M. RICHARDSON

TELEPHONE
(954) 721-7300

September 28, 2018

Chair, Grievance Committee
c/o George Riley, Executive Director
Republican Party of Florida
420 East Jefferson Street
Tallahassee, FL 32301

Re: Grievances against Richard DeNapoli, Rupert Tarsey, & Michael Kane

Dear Grievance Committee Chair:

I respectfully file a grievance against three members of the Broward County Republican Committee (BREC) for violations of their Loyalty Oaths and for conduct that is conflict with their roles as a BREC member and/or officer. As I am sure you are aware Mr. DeNapoli is the state committeeman for Broward County and Mr. Tarsey is the BREC secretary. Please note that Mr. Tarsey is still on a one-year probationary period as imposed by your committee and affirmed by the RPOF chair late last year. Mr. Kane has no BREC titles but he and at least one other person, apparently both work with Mr. Denapoli and Mr. Tarsey in earning money selling access to an e-mail data base which was created by taking proprietary information owned by BREC.

On Monday July 23, 2018, BREC held its monthly meeting and at such monthly meeting the officers allowed the numerous Broward County judicial candidates to speak, after adjourning the meeting. No motions were made to endorse any of these candidates. Notwithstanding this fact on Wednesday, July 25, all BREC members received an e-mail stating that BREC had endorsed various judicial candidates, as well as candidates for school board. Both races are nonpartisan in our county. See Exhibit A attached. Surprisingly, of the eight judicial candidates named only three are registered Republicans and one of those endorsed was the key vote on the 2000 canvassing board that started the recount in Broward County that year. Of the five school board candidates endorsed only two are Republican and two of the endorsements went to currently sitting school board members who are not Republican. It is believed that Mr. DeNapoli and Mr. Tarsey were integral participants in making such endorsement without the input of the BREC membership.

Putting aside my anger, as an ex-chair, and two term former BREC vice chair, that BREC would publicly endorse Democrats and Democrat office holders and use BREC resources to support those candidates, and in at least one instance they endorsed a Democrat over a Republican, I did not publicly vent that anger. However, I came into possession of an e-mail that documented even more insidious action by the above referenced individuals and I have finally been authorized to share the e-mail.

I am attaching hereto as Exhibit B, a redacted¹ version of an e-mail that was forwarded to me by a judicial candidate, Mr. Miller (not endorsed by BREC), who related the following fact pattern to me, which fact pattern is confirmed by the e-mails that were forwarded to me:

1. On Friday July 27, 2018 Mr. Miller received an e-mail ostensibly from Mr. Kane, and in that e-mail reads as follows:

Hey, I am close friends with (name redacted) from the republican party, I have a few friends on the Board (sic) republican board. They have an e-mail list of 50K republicans in the county. They run a consulting company, would you be interested in them sending out mass emails on your behalf. **FYI the chairman alone is responsible for the endorsements of the party.**

2. Mr. Miller responded that he was interested and asked for a call after work that day.

3. Later that day, and after 5PM, Mr. Tarsey called Mr. Miller and solicited his business. Mr. Tarsey confirmed this phone call with an e-mail dated July 27, 2018, where he identified Mr. DeNapoli as assisting in the project, and that Mr. DeNapoli, the state committeeman, had set the price for the email blast. Please note that the address for payment is Mr. Tarsey's home address. See Exhibit C attached. The e-mail makes reference to a "praetorian consulting", however, the Division of Corporations, for a Tampa based entity named Praetorian Consulting Group, does not list any of the four individuals in this grievance as an officer or director. See Exhibit D attached.

4. Also, please note the passage in the e-mail where Mr. Tarsey reveals all of the referenced individuals use this particular e-mail account and that he is the author of the July 27, 2018 (11:51 PM) e-mail as it references his phone call with Mr. Miller.

5. Ultimately, Mr. Miller chose not to accept the offer made by Mr. Tarsey and Mr. DeNapoli.

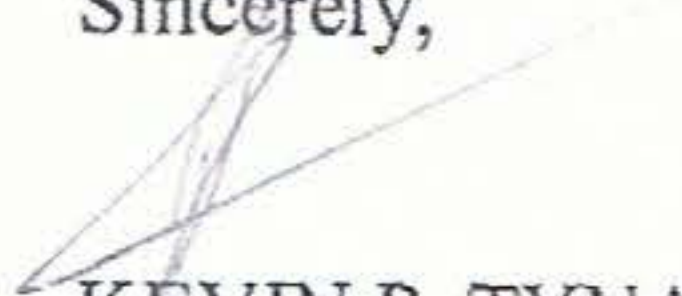
Also, on Friday July 27, 2018 and Saturday, July 28, 2018, my wife started receiving e-mails from judicial candidates, some of whom have the BREC endorsement, via an e-mail account she used when she was a BREC member. Proof of same is available upon request. After receipt of these e-mails I interviewed a consultant, who is managing several judicial campaigns, who stated it was common knowledge that Mr. Tarsey was making phone calls soliciting payment for access to the e-mail data base used by BREC and that Mr. DeNapoli was assisting in that endeavor.

Respectfully, this is a serious matter that should be investigated by the RPOF grievance committee. Please remember that Mr. Tarsey is currently on RPOF probation for being less than candid about

¹ Mr. Miller asked that I redact one name as that individual is a friend of his and I felt constrained to honor that request. Mr. Miller further asked me not to share his e-mail during the campaign and has only this week allowed me to share this e-mail.

his personal background and for other reasons set forth in the grievances that caused such probationary status. Please let me know if you need anything further from me at this time.

Sincerely,



KEVIN P. TYNAN
KPT/itm

cc: Rep. Blaise Ingoglia, Chair RPOF
Ben Gibson, RPOF counsel

From: BROWARD GOP <membershipbrowardgop@gmail.com>
To: kdsst <kdsst@aol.com>
Subject: BREC Judicial and School Board Endorsements
Date: Wed, Jul 25, 2018 5:53 pm

[View this email in your browser](#)



Official BREC Judicial Recommendations

Circuit Court Judicial Candidates-

Group 8: Ernest Kollra

Group 36: Kristin Weisberg Padowitz

Group 38: Stefanie Moon

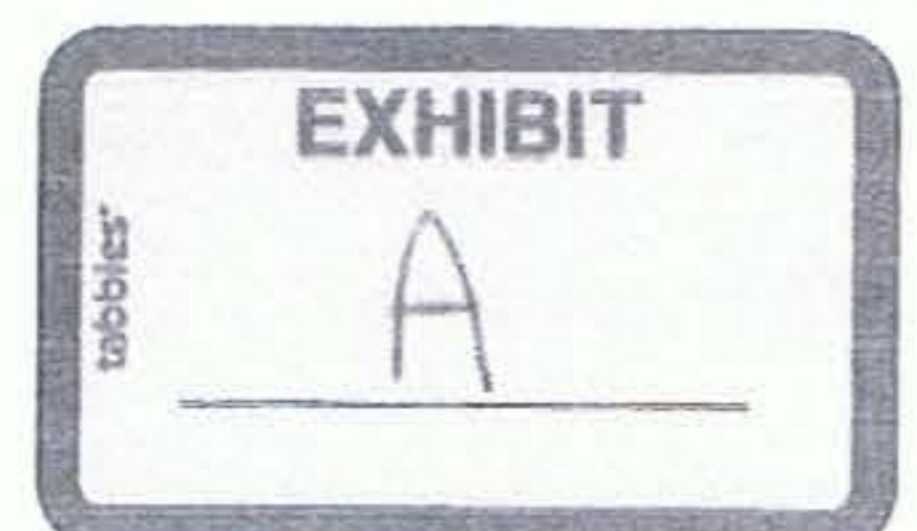
Group 42: Michael Usan

Group 46: Maria Markhasin-Weekes

County Court Judicial Candidates-

Group 9: Tanner Channing Demmery

Group 17: Michael Davis



Official School Board Recommendations:

District 1: Ann Murray

District 4: Lori Alhadeff

District 6: Richard Mendelson

District 7: Nora Rupert

District 8: Ryan Petty

*These races are presented in order of their appearance on the ballot.

*Important Note: All Judicial Races and School Board races are Non-Partisan, which means Party Affiliation will NOT appear on your ballot.



Our mailing address is:

224 Commercial Blvd. Suite 305. Lauderdale by the Sea, FL 33308

Want to change how you receive these emails?

You can [update your preferences](#) or [unsubscribe from this list](#).

This email was sent to kdsst@aol.com

[why did I get this?](#) [unsubscribe from this list](#) [update subscription preferences](#)
browardgop · 150 S. Andrews Avenue, Suite 370 · Pompano Beach, FL 33069 · USA



Kevin Tynan

From: Walter "Dale" Miller <dale@millerforjudge.com>
Sent: Saturday, July 28, 2018 11:02 AM
To: Kevin Tynan
Cc: carrera@flalaw.us
Subject: Fw: Republican lists

Dear Kevin:

On 7/27/18, I received an email from the attached address, and later spoke with Rupert Tarsey, who advised that he could assist with an email blast on behalf of my campaign. I was told that he would be marketing 50,000 emails based on [REDACTED] and Richard DiNapoli's list. This was presented to me as a private concern and not as an official affiliation with the Republican Party.

Upon further research, I discovered the named individuals are all closely associated with the Broward Republican Executive Committee. The Canons of Judicial Ethics preclude my campaign from accepting any sort of assistance or endorsements from political parties. As such, I am uncomfortable going forward with this endeavor. I reached out to you upon advice of a supporter. Is there anything else I should do in order to avoid any appearance of impropriety or conflict?

As an aside, I would be curious to see if my opponent, who I was told would appear on the Republican Palm Card, did avail themselves of Mr. Tarsey's offer and used their services.

Thank you in advance for your assistance.

Kindest regards,

Walter "Dale" Miller

Candidate for Broward Circuit Judge (Group 46)

www.MillerForJudge.com

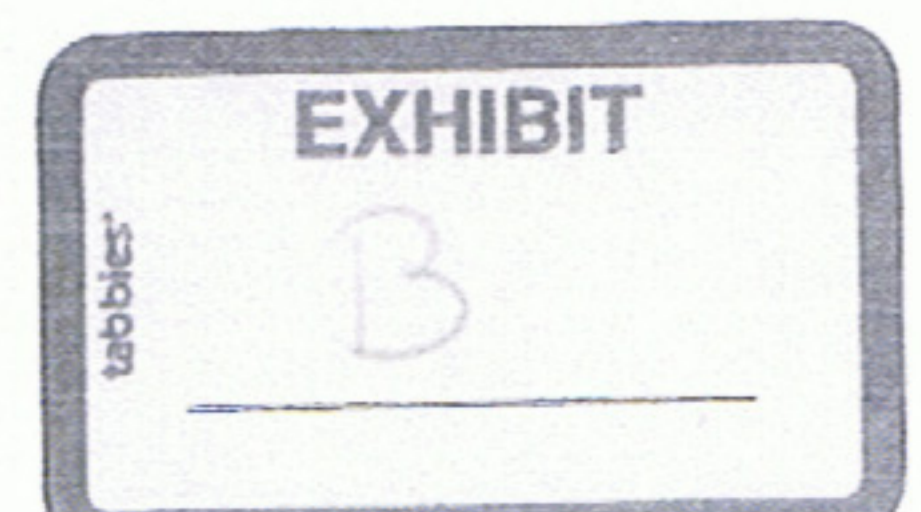
Facebook: @MillerForJudge2018

Instagram: @MillerForJudge2018

Twitter: @MillerForJudge

Political Advertisement Paid For and Approved by Walter "Dale" Miller, Non Partisan for Broward Circuit Judge, Group 46.

From: Mike Kane <michaelkanefl@gmail.com>
Sent: Friday, July 27, 2018 11:51 PM
To: Walter "Dale" Miller
Cc: Richard DeNapoli
Subject: Re: Republican lists



We can correspond on this email address, it's a shared address. First of all, noticed you are in kofc assembly 157. Didn't realize that when we chatted, we are in the same council and I was the gk of my regular council.

Spoke with Richard, the state committeeman who has the big list, he said 500 is good. Write up what you want us to send out and we will send it out to our 50 k list multiple times. I'm sure you have already crafted a standard promo email, that would work. It's a mostly republican list but not exclusively. I don't think you can anyways but I wouldn't put anything partisan. Also, we will probably make an email address for you to send it out on. Something like votemiller4judge@gmail. Or something like that.

Check payable to "praetorian consulting". Address to be mailed to - 6725 NW 122nd Ave parkland FL 33076.

Send me what to send out, confirm check has been mailed and we are good!

Separately, if you win, please give us future business!

Also if you know of another candidate in another race interested, let me know.

Any questions let me know!

On Friday, July 27, 2018, Mike Kane <michaelkanefl@gmail.com> wrote:
Great. Expect a call around 6ish

On Friday, July 27, 2018, Walter "Dale" Miller <dale@millerforjudge.com> wrote:
Absolutely. Please have them call me after work today.

Thanks.

Walter "Dale" Miller

Candidate for Broward Circuit Judge (Group 46)

www.MillerForJudge.com

Facebook: @MillerForJudge2018

Instagram: @MillerForJudge2018

Twitter: @MillerForJudge

Political Advertisement Paid For and Approved by Walter "Dale" Miller, Non Partisan for Broward Circuit Judge, Group 46.

From: Mike Kane <michaelkanefl@gmail.com>

Sent: Friday, July 27, 2018 11:26:23 AM

To: Walter "Dale" Miller

Subject: Republican lists

Hey, I am close friends with [REDACTED] from the republican party, I have a few friends on the Board republican board. They have an email list of 50 k republicans in the county. They run a consulting company, would you be interested in them sending out mass emails on your behalf? **FYI the chairman alone is responsible for endorsements of the party.**

CAMPAIGN TREASURER'S REPORT - ITEMIZED EXPENDITURES

(1) Name Bico Petracelli

(2) I.D. Number

2018
6-7

(3) Cover Period 10/20/18 through 11/1/18

(4) Page

1 of 2

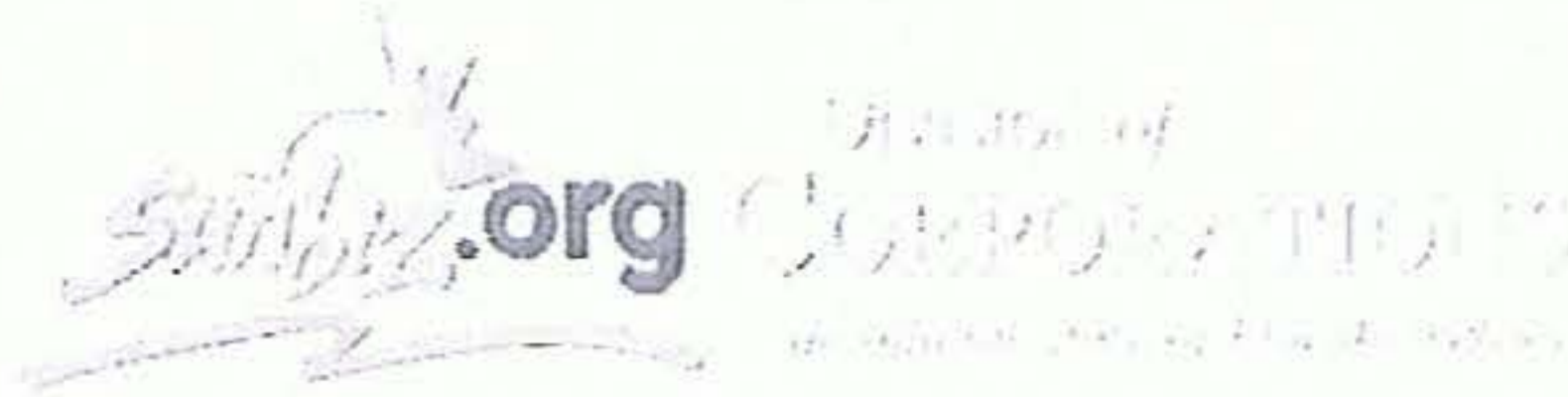
(5) Date	(6) Sequence Number	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Purpose (add office sought if contribution to a candidate)	(9) Expenditure Type	(10) Amendment	(11) Amount
10/22/18	32	Fuel 7-11				\$ 51.50
10/24/18	33	95 UNION SQUARE	stall			\$ 55.40
10/25/18	34	Practitioner Co. Inc. 255 ALHAMBRA CIR Coral Gables, FL	Camp. Tent			\$ 249.26
10/25/18	35	D. Petracelli Plantation, FL	work			\$ 250.00
10/25/18	36	C. Petracelli 7900 W 18th ST Plantation	Comp. W/H			\$ 200.00
10/25/18	37	Publix Union Square	stamps			\$ 100.00
10/29/18	38	A Harris Coral Springs	Soc. Med in			\$ 300.00
10/31/18	39	Trademark Graphics P-Pier FLA	Mailer			\$ 1,243.32

Report Year	Filed Date
2017	01/13/2017
2018	04/01/2018

Document Images

04/01/2018 -- ANNUAL REPORT	View image in PDF format
01/13/2017 -- ANNUAL REPORT	View image in PDF format
09/19/2016 -- LC Amendment	View image in PDF format
09/13/2016 -- Florida Limited Liability	View image in PDF format

Florida Department of State, Division of Corporations



[Department of State](#) / [Division of Corporations](#) / [Search Records](#) / [Detail By Document Number](#) /

Detail by Entity Name

Florida Limited Liability Company
PRAETORIAN CONSULTING GROUP

Filing Information

Document Number	L16000171190
FEI/EIN Number	81-3831479
Date Filed	09/13/2016
Effective Date	09/13/2016
State	FL
Status	ACTIVE
Last Event	LC AMENDMENT
Event Date Filed	09/19/2016
Event Effective Date	NONE

Principal Address

13807 KHILANI CT
TAMPA, FL 33624

Changed: 01/13/2017

Mailing Address

12651 N. DALE MABRY HWY
BOX 272259
TAMPA, FL 33618

Changed: 09/19/2016

Registered Agent Name & Address

RAMOS, BRUCE S
13807 KHILANI CT
TAMPA, FL 33624

Authorized Person(s) Detail

Name & Address

Title ED

RAMOS, BRUCE S
13807 KHILANI CT
TAMPA, FL 33624

Annual Reports



Close

Voter Info

Tarsey, Rupert 6725 NW 122nd Ave
Parkland, FL 33076

Voter Registration

NAME		ID-NUMBER		
Tarsey, Rupert		123102592		
COUNTY	PRECINCT	PARTY		
Broward	Q044.2	REP		
REGISTRATION DATE	DATE OF BIRTH	AGE	SEX	RACE
01/14/2016	07/01/1989	29	M	W
CONGRESS	STATE SENATE	STATE HOUSE		
22	29	96		
COUNTY COMMISSION	SCHOOL BOARD	CITY CODE		
3	4	0		

PHYSICAL ADDRESS
6725 NW 122nd Ave
Parkland, FL 33076

MAILING ADDRESS
6725 NW 122nd Ave
Parkland, FL 33076

Aug 28th Primary Election Voting Status
(Check Daily County Reporting Status)

Has Voted	AB Returned	AB Provided	AB Requested
This info is only available to campaigns that have verified access to AB data. To activate, complete the AB request form at the bottom of the Campaign Setup menu option.			

Output Options

Candidate Petition Forms

Highlight date & signature box? ☐
☐ 1/page ☐ 2/page ☐ 4/page* ☐ Index

Card*

* You must be certain that your PDF viewer software has page scaling disabled in the Print options or forms will be invalid.

Vote-By-Mail Ballot Request Forms

☐ 3/page

Print for Voter

Print for House

Target Houses Near Voter

scOracle™ / Voting History

PRIMARY

GENERAL

53

60

YEAR

PRIMARY

GENERAL

2016

Poll

Early

Registered 01/14/2016

Elections Count: 3

Elections Dates: 2016-11-08, 2016-08-30, 2016-03-15,
House Score Graph: voters

Extra Info

DOE Contributions From These Addresses

Amount	Date	Name	Occupation	Recipient
\$100	01/31/2017	TARSEY, RUPERT		Heather D. Fitzenhagen, REP for STR 78

EXHIBIT

7/28/2018

First Lady Melania Trump stated that "If a person is bold enough to accuse people of negative actions, they have a responsibility to stand by their words and people have a right to defend themselves. You are not protecting this country. You are sabotaging it with your cowardly actions". This quote was in reference to anonymous attacks on her husband, President Trump.

In years past, voter intimidation, suppression, and disenfranchisement, were in the form of beatings, cross burnings, road blocks, and airplane leaflet drops. In August of 1922 the Ku Klux Klan air dropped intimidating leaflets on certain areas to suppress the vote. In Broward county in 2018 - 2019 "Mr. Anonymous" or "John Doe" just hit 'send' causing created web sites and emails to be 'air dropped'. They were a direct hit through personal computers, and cell phones, to homes, to offices, to clients, to potential clients, to family, and to friends. Damage and intimidation was accomplished. Broward voters got the message to back down or you will be next.

Recently Broward voters have been intimidated, suppressed, and disenfranchised. Many Broward voters witnessed relentless, repetitive, fake, inflammatory, and anonymous emails and web site cyber attacks. Hundreds if not thousands of voters were given the message to take heed and comply or have their businesses, family, and person would be attacked in the same way. There no longer was a need for the KKK airplane drops. These fake, inflammatory, and anonymous electronic communications were sent directly to their business associates, clients, friends, family members, and others. Numerous voters in Broward County had emails and/or websites sent out that harmed them economically, socially, politically, and personally! Broward voters got the message and backed down. They did not want this to happen to them.

One individual, who was strong enough and had the resources to fight back, legally proved the following. In the Circuit Court of the 17th Judicial Circuit in and for Broward County Case Number 17-019487 one such Mr. Anonymous – Defendant John Doe - was identified as Jeffrey Brown, 401 E. Las Olas Blvd. #130 Fort Lauderdale, FL 33301.

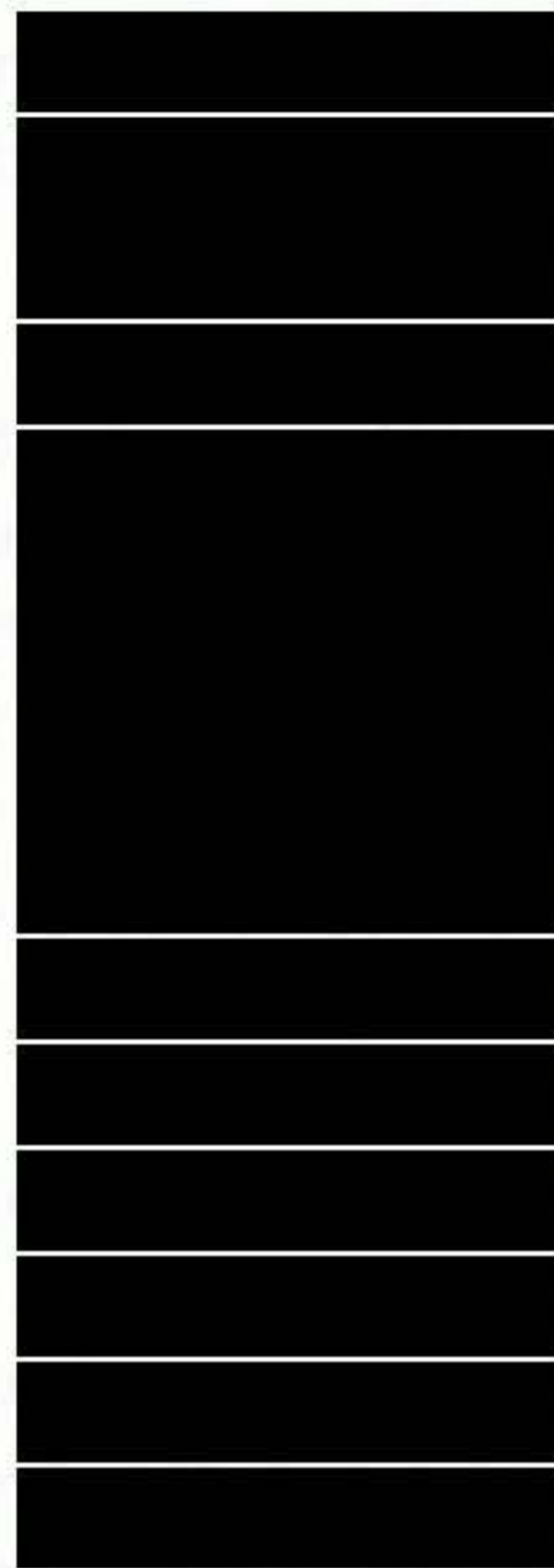
Your assistance in answering the following is requested. Did Mr. Brown act alone? Did he have accomplices? What was the motive? Was Mr. Brown self-funded? What laws were broken? What are the victims recourse? How can this wrong be corrected? What, if anything, was Mr. Brown promised for his services? Is the following code listed below applicable to the events in Broward County?

"18 U.S. Code 602" Whoever, directly or indirectly, promises any employment, position, compensation, contract, appointment, or other benefit, provided for or made possible in whole or in part by any Act of Congress, or any special consideration in obtaining any such benefit, to any person as consideration, favor, or reward for any political activity or for the support of or opposition to any candidate or any political party in connection with any general or special election to any political office, or in connection with any primary election or political convention or caucus held to select candidates for any political office, shall be fined under this title or imprisoned not more than one year, or both.

The Florida Department of State, Office of the General Counsel requested that I provide material a case by a case basis and that any and all information on the above be forwarded to them. I am complying with their request.

Respectfully Submitted,
Robert W. Sutton
Partial Witness List:

Robert W. Sutton
Attorney Robert Nichols
Attorney Alvin Entin
Attorney Kevin Tynan
Attorney Scott Newmark
Benjamin H. Bennett
Tom Lauder
Javier Manjarres
Jay Narang
Marty Kiar
Daniel Diaz
George Moraitis
Celeste Ellich
Peter Palmer
Bob Wolf



+ The hundreds if not thousands that received the emails.

Respectfully Submitted,
Robert W. Sutton
Vice President



Republican Party of Florida Party Loyalty Oath

I, Celeste Ellich, swear and/or affirm that during my term of
(Name of Member - Please write clearly)

office I will not actively, publicly, or financially support the election of any candidate other than the Republican Candidate in a partisan unitary, general or special election, or a registered Republican in non-partisan elections, other than Judicial races governed under chapter 105, Florida Statutes, if there is a registered Republican running for the same office.

Further, in a contested Republican primary election, I will not support the nomination of one Republican candidate over another in my capacity as a Republican County Executive Committee member unless the Party has voted to endorse under RPOF Rule 8. This rule does not preclude me from supporting in any manner my personal Republican candidate of choice, provided I do not express such support with public reference to my title or office within the Republican Party of Florida.

Celeste Ellich
Signature of Member

Broward/P004
County/Precinct #

[Signature]
Signature of Witness

6/10/2020
Date

Office: Precinct Committeewoman
(State Committeeman, State Committeewoman; Precinct Committeeman, Precinct Committeewoman;
Alt. Precinct Committeeman, Alt. Precinct Committeewoman)

Address, as it appears on voter registration

Wilton Manors,
City, State, Zip

Email

Phone Number



Republican Party of Florida Party Loyalty Oath

I, Celeste Ellich swear and/or affirm that during my term of
(Name of Member - Please write clearly)

office I will not actively, publicly, or financially support the election of any candidate other than the Republican Candidate in a partisan unitary, general or special election, or a registered Republican in non-partisan elections, other than Judicial races governed under chapter 105, Florida Statutes, if there is a registered Republican running for the same office.

Further, in a contested Republican primary election, I will not support the nomination of one Republican candidate over another in my capacity as a Republican County Executive Committee member unless the Party has voted to endorse under RPOF Rule 8. This rule does not preclude me from supporting in any manner my personal Republican candidate of choice, provided I do not express such support with public reference to my title or office within the Republican Party of Florida.

Celeste Ellich
Signature of Member

[Signature]
Signature of Witness

Broward / P004
County/Precinct #

6/10/2020
Date

Office: State Committeewoman
(State Committeeman, State Committeewoman; Precinct Committeeman, Precinct Committeewoman; Alt. Precinct Committeeman, Alt. Precinct Committeewoman)

[Redacted]
Address, as it appears on voter registration

[Redacted]
Email

Wilton Manors,
City, State, Zip [Redacted]

[Redacted]
Phone Number



Republican Party of Florida Party Loyalty Oath

I, Susan M. Guinger, swear and/or affirm that during my term of
(Name of Member - Please write clearly)

office I will not actively, publicly, or financially support the election of any candidate other than the Republican Candidate in a partisan unitary, general or special election, or a registered Republican in non-partisan elections, other than Judicial races governed under chapter 105, Florida Statutes, if there is a registered Republican running for the same office.

Further, in a contested Republican primary election, I will not support the nomination of one Republican candidate over another in my capacity as a Republican County Executive Committee member unless the Party has voted to endorse under RPOF Rule 8. This rule does not preclude me from supporting in any manner my personal Republican candidate of choice, provided I do not express such support with public reference to my title or office within the Republican Party of Florida.

Susan M. Guinger
Signature of Member

Celeste Ellich
Signature of Witness

C 23
County/Precinct #

June 10, 2020
Date

Office: Precinct Committeewoman

(State Committeeman, State Committeewoman; Precinct Committeeman, Precinct Committeewoman;
Alt. Precinct Committeeman, Alt. Precinct Committeewoman)

[Redacted]
Address, as it appears on voter registration

Pompano Beach
City, State, Zip

[Redacted]
Email

[Redacted]
Phone Number



Republican Party of Florida Party Loyalty Oath

I, Peter Anderson, swear and/or affirm that during my term of
(Name of Member - Please write clearly)

office I will not actively, publicly, or financially support the election of any candidate other than the Republican Candidate in a partisan unitary, general or special election, or a registered Republican in non-partisan elections, other than Judicial races governed under chapter 105, Florida Statutes, if there is a registered Republican running for the same office.

Further, in a contested Republican primary election, I will not support the nomination of one Republican candidate over another in my capacity as a Republican County Executive Committee member unless the Party has voted to endorse under RPOF Rule 8. This rule does not preclude me from supporting in any manner my personal Republican candidate of choice, provided I do not express such support with public reference to my title or office within the Republican Party of Florida.

Peter Anderson
Signature of Member

Celeste Ellich
Signature of Witness

Browns 2025
County/Precinct #

June 5th 2020
Date

Office: Precinct Committeeman
(State Committeeman, State Committeewoman, Precinct Committeeman, Precinct Committeewoman;
Alt. Precinct Committeeman, Alt. Precinct Committeewoman)

[Redacted]
Address, as it appears on voter registration

[Redacted]
Email

FD Jacksonville
City, State, Zip

[Redacted]
Phone Number