

**IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT  
IN AND FOR SARASOTA COUNTY, FLORIDA**

**REPUBLICAN CLUB OF SOUTH  
SARASOTA COUNTY,**

Plaintiff,

vs.

**CASE NO.:**  
**DIVISION:**

**AMERICA FIRST SWFL CAUCUS, INC.,** a  
Florida corporation, **DONNA DEFIORE,**  
individually, **JAMES HOEL,** individually,  
**THERESA ANGLEY,** individually, and **MARY  
GERMANI,** individually.

Defendants.

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**COMPLAINT**

Plaintiff, **REPUBLICAN CLUB OF SOUTH SARASOTA COUNTY** (“RCSSC”) sues  
Defendants **AMERICA FIRST SWFL CAUCUS, INC.** (“America First”), a Florida  
Corporation, **DONNA DEFIORE** (“DeFiore”), **JAMES HOEL** (“Hoel”), **THERESA ANGLEY**  
 (“Angley”), and **MARY GERMANI** (“Germani”) (collectively, the “Defendants”), and states as  
follows:

**Jurisdictional Allegations**

1. This is an action seeking damages that exceed \$50,000.00, exclusive of attorneys’  
fees and costs.
2. Plaintiff, RCSSC, is a political club based in Sarasota County, Florida that is  
chartered through the Republican Party of Florida (“RPOF”).
3. Defendant, America First, is a Florida corporation, with its principal place of  
business in Sarasota County, Florida.

4. Defendant Defiore is a resident of Sarasota County, Florida. She is the current Treasurer and Registered Agent of America First.

5. Defendant Hoel is a resident of Sarasota County, Florida. He is the current President of America First.

6. Defendant Angley is a resident of Sarasota County, Florida. She is the is the current Vice President of America First

7. Defendant Germani is a resident of Sarasota County, Florida. She is the current Secretary of America First.

8. Venue is appropriate in Sarasota County, Florida, as the acts giving rise to this litigation occurred in Sarasota County, Florida.

### **Factual Allegations**

9. Plaintiff, RCSSC, brings causes of action against several disgruntled, former members of the RCSSC who conspired to commit intentional, felonious, and malicious acts of theft against their former organization, including commandeering RCSSC's bank account and transferring the funds contained therein to their newly-created organization, among other physical and intellectual property belonging to Plaintiff.

10. DeFiore, Hoel, Angley, and Germani previously served as officers of the RCSSC.

11. As officers of RCSSC, DeFiore, Hoel, Angley, and Germani owed a fiduciary duty to RCSSC.

12. Plaintiff holds a bank account at Fifth Third Bank (the "Bank Account") to which Defendants had access at all times relevant to this litigation.

13. At some point in the Fall/Winter of 2023, a dispute arose about the direction and principles of the club.

14. Around this time, DeFiore, Hoel, Angley, and Germani, conspired to leave the RCSSC and start their own club and/or organization.

15. On or about December 28, 2023, Hoel, Germani, DeFiore, and Angley filed the Articles of Incorporation for America First Southwest Florida Caucus, Inc., with an effective date of January 1, 2024. The Articles of Incorporation list DeFiore as the treasurer and registered agent, Hoel as president, Angley as vice president, and Germani as secretary of the newly-formed corporation. *A copy of the filed Articles of Incorporation is attached as Exhibit "1."*

16. Defendants brought or attempted to bring other current members of RCSSC into their new organization.

17. On or about January 3, 2024, the Defendants attempted to, without authority, dissolve RCSSC, and revoke its status as a chartered organization through the RPOF. *A copy of a letter from Defendant Hoel to RPOF detailing the same is attached as Exhibit "2."*

18. On January 10, 2024, Defendants Hoel, Germani, DeFiore, and Angley were sworn in as the 2024 officers of America First during a regular meeting. *A copy of the meeting minutes from January 10, 2024 are attached as Exhibit "3."*

19. On or about January 11, 2024, Defendants stole at least \$7,500.00 out of the Fifth Third Bank account (the "Bank Account") belonging to RCSSC, through an unauthorized check made out to Defendant America First. An additional check was made out to Defendant America First in the amount of \$3,075.48 to close out the account. The checks totaling \$10,757.48 were both signed by Defendant DeFiore.

20. Defendants also removed and retained almost all of the property belonging to RSCCS, including, without limitation, tables, chairs, coffee pots, promotional materials, mail and other parcels, mailbox keys projection equipment, banners, equipment, financial and tax records,

checks and check books, club documents, and even the website and domain name(s) associated with RCSSC.

21. On or about March 1, 2024, counsel for Plaintiff sent each of the Defendants Civil Theft Demand Letters. *A courtesy copy of these letters is attached as Composite Exhibit "4."*

22. Defendants did not respond other than through their counsel who indicated that they did not believe RCSSC was still in existence.

23. In an official letter, dated March 18, 2024, the RPOF wrote a letter to Hoel clarifying the status of the RCSSC. The RPOF informed Hoel that the RCSSC's charter through the RPOF "was not terminated and remains in place until March 31, 2025, pursuant to Rule 1 of the RPOF Rules of Procedure, unless the Club submits a charter renewal application on or before March 15, 2024 and subsequently receives approval from the RPOF Chairman." *A copy of the letter is attached as Exhibit "5."*

24. Rule 1 of the RPOF Rules of Procedure states as follows:

All general charters issued by the Republican Party of Florida expire on March 31 of each odd-numbered year unless renewed as provided in this Rule. On or before February 1 in each odd-numbered year, the Republican Party of Florida will send charter renewal information, requirements, and instructions to each chartered club, group, association, or organization with a copy to the applicable Republican State Executive Committee Members. . . .

If any entity chartered under this Rule becomes inactive, has its charter revoked or fails to renew its charter, it shall not expend funds without the permission of the Republican Party of Florida and the assets of such inactive entity shall become the property of the Republican Party of Florida and then be split equally between the Republican Party of Florida and the local Republican Executive Committee(s) in which the entity was chartered. The last officers of such entity shall be responsible for the transfer of any assets to the Republican Party of Florida, which transfer of assets shall be accomplished within 90 days from the time the entity becomes inactive or the time when its charter is no longer valid.

25. According to the RPOF Rules of Procedure, even if the RCSSC had become inactive, had its charter revoked, or failed to renew its charter, Defendants were never entitled to repurpose or transfer the funds.

26. Plaintiff has retained the Law Firm of Bentley Goodrich Kison, P.A., and is obligated to pay them a reasonable fee for their services.

27. All conditions precedent to this action have occurred, been performed, or have been waived.

**COUNT I – CIVIL THEFT**  
**(against all Defendants)**

28. This is an action for civil theft pursuant to § 772.11, Florida Statutes, with damages in excess of \$50,000.00, exclusive of attorneys' fees and costs.

29. Plaintiff realleges paragraphs 1 through 27, as though fully set forth herein.

30. On or about March 1, 2024, Plaintiff served each of the Defendants with a statutory demand for the value of their personal property, in accordance with § 772.11, Florida Statutes. *See Exhibit "2."*

31. Defendants have failed to comply with the civil theft demand within thirty (30) days of service of said letter upon them.

32. As a direct and proximate cause of Defendants' civil theft, Plaintiff is entitled to an award of treble damages totaling \$63,000.00, plus interest.

33. Pursuant to § 772.11, Florida Statutes, Plaintiff is entitled to attorneys' fees and court costs upon prevailing in an action for civil theft.

WHEREFORE, Plaintiff, **REPUBLICAN CLUB OF SOUTH SARASOTA COUNTY**, respectfully requests this Court enter a judgment for damages in its favor against Defendants

**AMERICA FIRST SWFL CAUCUS, INC., DONNA DEFIORE, JAMES HOEL, THERESA ANGLELY, and MARY GERMANI**, in the amount of \$63,000.00, plus interest, attorneys' fees, costs, and such further relief as this Court deems just and proper.

**COUNT II – CONVERSION**  
**(against all Defendants)**

34. This is an action for conversion against all Defendants, with damages not exceeding \$50,000.00.

35. Plaintiff incorporates and reasserts paragraphs 1 through 27 as if fully set forth herein.

36. Defendants without authorization, permanently converted Plaintiff's property to their own possession with the intent of permanently depriving Plaintiffs from the use thereof.

37. Plaintiff demanded a return of its property and Defendants refused to comply.

38. As a direct and proximate result of Defendants' conversion of Plaintiff's personal property, Plaintiffs have suffered a loss.

**WHEREFORE**, Plaintiff, **REPUBLICAN CLUB OF SOUTH SARASOTA COUNTY**, respectfully requests judgment for damages in its favor, and to reserve jurisdiction to award such other relief as may be appropriate.

**COUNT III – REPLEVIN**  
**(against all Defendants)**

39. This is a count for replevin against Defendants for property, the value of which exceeds \$50,000, exclusive of attorneys' fees and costs.

40. Plaintiff realleges the allegations contained in paragraphs 1 through 27 above, as if fully set forth herein.

41. In their capacities as officers of RCSSC, Defendants temporarily held and

had access to numerous documents, bank account information, tangible property, intellectual property, and information necessary for the management of Plaintiff's finances and daily operations. This personal property is identified as follows:

- a) All funds transferred out of Plaintiff's Bank Account
- b) All funds used from the RCSSC bank account to pay-for or fund the organization, start-up, on-going expenses, etc. of America First
- c) All Bank statements for RCSSC's bank account at Fifth Third Bank
- d) All check books and checks
- e) Login information for any accounts held or previously held by RCSSC
- f) Login information for Facebook page and all other social media accounts used by RCSSC (including those converted to America First social media accounts without authorization)
- g) All digital content used and/or created by RCSSC
- h) All historical RCSSC data and pictures
- i) RSCCS financial records
- j) Tax ID number for RCSSC
- k) Legal and organizational documents, including tax filing
- l) Board Minutes
- m) Club Meeting Minutes
- n) All domain names, including but not limited to:
  - RCSSCgop.com
  - RepublicanClubOfSouthSarasotaCounty.com
- o) Membership List as of December 21, 2023 with contact information of members
- p) Constant Contact account with all contact information
- q) All mail addressed to the Republican Club of South Sarasota County or RCSSC
- r) P.O. Box 352 and the keys to the mailbox located at the Post Office on Venice Island
- s) All equipment purchased by RCSSC, including but not limited to, projectors, coffee maker, tables, chairs, etc.
- t) All RCSSC signs and banners, including the two (2) large round signs used on the podium
- u) Any and all items related to or belonging to RCSSC.

(the "Personal Property").

42. The Personal Property is wrongfully detained by Defendants, despite Following the termination of Defendants' financial and administrative services,

Defendants retained the above-identified Personal Property, despite numerous demands for the return of the same.

43. Plaintiff is the owner of the Personal Property and is entitled to possession of the Personal Property which is wrongfully detained by Defendants.

44. The Personal Property is wrongfully detained by the Defendants who have come into possession thereof for the limited purpose of performing under the verbal contract to provide financial and administrative services for Plaintiff, which Defendants terminated, and Defendants have failed to return said Personal Property.

45. To the best of Plaintiff's knowledge, information, and belief, the value associated with the Personal Property is \$21,000.00.

46. Plaintiff is unsure of the exact physical location of the Personal Property but knows it to be in the possession of Defendants.

47. The claimed Personal Property has not been taken for a tax, assessment, or fine pursuant to law.

48. The Personal Property has not been taken under an execution or attachment against the property of the Plaintiff.

**WHEREFORE, REPUBLICAN CLUB OF SOUTH SARASOTA COUNTY,** respectfully requests judgment against Defendants **AMERICA FIRST SWFL CAUCUS, INC., DONNA DEFIORE, JAMES HOEL, THERESA ANGLE, and MARY GERMANI** for possession of the Personal Property, for costs, and for any such further relief that this Court deems proper.

**COUNT IV – CIVIL CONSPIRACY**  
**(against Defendants DeFiore, Hoel, Angley, and Germani)**

49. This is an action for civil conspiracy by Plaintiff against Defendants DeFiore, Hoel, Angley, and Germani, with damages in excess of \$50,000.00, exclusive of attorneys' fees and costs.

50. Plaintiff realleges the allegations contained in paragraphs 1 through 27 above, as if fully set forth herein.

51. Defendants DeFiore, Hoel, Angley, and Germani had an agreement to do an unlawful act by unlawful means, namely, to take money and property belonging to Plaintiff with the intention to permanently deprive Plaintiff of the same.

52. Defendants committed overt acts in furtherance of the conspiracy by *inter alia*, transferring money to Defendant America First, closing a bank account belonging to Plaintiff, and attempting to dissolve RCSSC without authorization.

53. As a result, Plaintiff suffered damages.

**WHEREFORE**, Plaintiff, **REPUBLICAN CLUB OF SOUTH SARASOTA COUNTY**, respectfully requests this Court issue judgment against Defendants, **DONNA DEFIORE, JAMES HOEL, THERESA ANGLELY**, and **MARY GERMANI** for damages, costs, prejudgment interest, and any such other and further relief as this Court deems just and proper.

**COUNT V – BREACH OF FIDUCIARY DUTY**  
**(against Defendant DeFiore)**

54. This is a common law action for breach of fiduciary duty against DeFiore, with damages in excess of \$50,000.00.

55. Plaintiff realleges and incorporates paragraphs 1 through 27 as if fully set forth herein.

56. DeFiore and Plaintiff shared a relationship whereby (a) Plaintiff placed its trust and confidence in DeFiore; and (b) DeFiore accepted such trust and assumed a duty to advise, counsel, and/or protect Plaintiff.

57. While still serving as an officer of the RCSSC, Defendant DeFiore breached this duty when she established a competing club, and then conspired to misappropriate Plaintiff's proprietary and confidential information, and property, including transferring funds from Plaintiff's account to Defendant America First.

58. Because of Defendant DeFiore's breach of fiduciary duty, Plaintiff has been damaged.

**WHEREFORE, REPUBLICAN CLUB OF SOUTH SARASOTA COUNTY,** respectfully requests judgment against Defendant **DONNA DEFIORE, JAMES HOEL, TERRY ANGLE, and MARY GERMANI** for breach of fiduciary duty and for any such further relief that this Court deems proper.

**COUNT VI – BREACH OF FIDUCIARY DUTY**  
**(against Defendant Hoel)**

59. This is a common law action for breach of fiduciary duty against Hoel, with damages in excess of \$50,000.00.

60. Plaintiff realleges and incorporates paragraphs 1 through 27 as if fully set forth herein.

61. Defendant Hoel and Plaintiff shared a relationship whereby (a) Plaintiff placed its trust and confidence in Hoel; and (b) Hoel accepted such trust and assumed a duty to advise, counsel, and/or protect Plaintiff.

62. While still serving as an officer of the RCSSC, Defendant DeFiore breached this duty when he established a competing club, and then conspired to misappropriate Plaintiff's proprietary and confidential information, and property.

63. Because of Defendant Hoel's breach of fiduciary duty, Plaintiff has been damaged.

**WHEREFORE, REPUBLICAN CLUB OF SOUTH SARASOTA COUNTY,** respectfully requests judgment against Defendant **JAMES HOEL** for breach of fiduciary duty and for any such further relief that this Court deems proper.

**COUNT VII – BREACH OF FIDUCIARY DUTY**  
**(against Defendant Angley)**

64. This is a common law action for breach of fiduciary duty against Defendant Angley, with damages in excess of \$50,000.00.

65. Plaintiff realleges and incorporates paragraphs 1 through 27 as if fully set forth herein.

66. Defendant Angley and Plaintiff shared a relationship whereby (a) Plaintiff placed its trust and confidence in Angley; and (b) Angley accepted such trust and assumed a duty to advise, counsel, and/or protect Plaintiff.

67. While still serving as an officer of the RCSSC, Defendant Angley breached this duty when she established a competing club, and then conspired to misappropriate Plaintiff's proprietary and confidential information, and property.

68. Because of Defendant Angley's breach of fiduciary duty, Plaintiff has been damaged.

**WHEREFORE, REPUBLICAN CLUB OF SOUTH SARASOTA COUNTY,** respectfully requests judgment against Defendant **TERRY ANGLE**Y for breach of fiduciary duty and for any such further relief that this Court deems proper.

**COUNT VIII – BREACH OF FIDUCIARY DUTY**  
**(against Defendant Germani)**

69. This is a common law action for breach of fiduciary duty against Defendant Germani, with damages in excess of \$50,000.00.

70. Plaintiff realleges and incorporates paragraphs 1 through 27 as if fully set forth herein.

71. Defendant Germani and Plaintiff shared a relationship whereby (a) Plaintiff placed its trust and confidence in Germani; and (b) Germani accepted such trust and assumed a duty to advise, counsel, and/or protect Plaintiff.

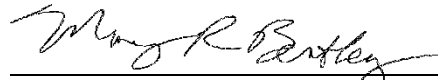
72. While still serving as an officer of the RCSSC, Defendant Germani breached this duty when she established a competing club, and then conspired to misappropriate Plaintiff's proprietary and confidential information, and property.

73. Because of Defendant Germani's breach of fiduciary duty, Plaintiff has been damaged.

**WHEREFORE, REPUBLICAN CLUB OF SOUTH SARASOTA COUNTY,** respectfully requests judgment against Defendant **MARY GERMANI** for breach of fiduciary duty and for any such further relief that this Court deems proper.

Dated: April 11, 2024

**BENTLEY GOODRICH KISON, P.A.**



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**MORGAN R. BENTLEY, ESQ.**

Florida Bar No.: 0962287

mbentley@bgk.law

**MADLINE A. SALAMONE, ESQ.**

Florida Bar No.: 1031953

msalamone@bgk.law

783 S. Orange Avenue, 3<sup>rd</sup> Floor

Sarasota, FL 34236

(941) 556-9030 Office

(941) 312-5316 Facsimile

***Attorneys for Plaintiff***

dwoodson@bgk.law

eserve@bgk.law

**Electronic Articles of Incorporation  
For**

N24000000147  
FILED  
December 28, 2023  
Sec. Of State  
klovelace

AMERICA FIRST SWFL CAUCUS INC.

The undersigned incorporator, for the purpose of forming a Florida not-for-profit corporation, hereby adopts the following Articles of Incorporation:

**Article I**

The name of the corporation is:

AMERICA FIRST SWFL CAUCUS INC.

**Article II**

The principal place of business address:

80 MARLIN RD  
VENICE, FL. US 34293

The mailing address of the corporation is:

PO BOX 352  
VENICE, FL. US 34284

**Article III**

The specific purpose for which this corporation is organized is:

THE AMERICA FIRST SWFL CAUCUS IS AN ACTIVE GRASSROOTS ORGANIZATION DEDICATED TO TRADITIONAL ECONOMIC AND SOCIAL VALUES WHERE THE AMERICAN CITIZENS RIGHTS AND PRIVILEGES ARE FOREMOST ON THE AGENDA.

**Article IV**

The manner in which directors are elected or appointed is:

AS PROVIDED FOR IN THE BYLAWS.

**Article V**

The name and Florida street address of the registered agent is:

DONNA K DEFIORE  
80 MARLIN RD  
VENICE, FL. 34293

I certify that I am familiar with and accept the responsibilities of registered agent.

Registered Agent Signature: DONNA K DEFIORE

## Article VI

The name and address of the incorporator is:

DONNA K DEFIORE  
80 MARLIN RD

VENICE

Electronic Signature of Incorporator: DONNA K DEFIORE

I am the incorporator submitting these Articles of Incorporation and affirm that the facts stated herein are true. I am aware that false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S. I understand the requirement to file an annual report between January 1st and May 1st in the calendar year following formation of this corporation and every year thereafter to maintain "active" status.

## Article VII

The initial officer(s) and/or director(s) of the corporation is/are:

Title: TREA  
DONNA K DEFIORE  
80 MARLIN RD  
VENICE, FL. 34293 US

Title: PRES  
JAMES A HOEL  
242 PIAZZA DI LUNA  
VENICE, FL. 34285 US

Title: VP  
THERESA ANGLEY  
601 PALOMINO CIRCLE  
NOKOMIS, FL. 34275 US

Title: SEC  
MARY L GERMANI  
26845 WEISKOPF DRIVE  
ENGLEWOOD, FL. 34223 US

## Article VIII

The effective date for this corporation shall be:

01/01/2024



**JAMES**

**HOEL**

**PRESIDENT**

**CONTACT**

PHONE:  
941-303-1787

WEBSITE:  
[AmericaFirstSWFLC.org](http://AmericaFirstSWFLC.org)

EMAIL:  
[JamesHoel@AmericafirstSWFLC.org](mailto:JamesHoel@AmericafirstSWFLC.org)

George Riley  
Executive Director  
Republican Party of Florida  
420 East Jefferson St.  
Tallahassee, FL 32301

**RE: Charter Status; Republican Club of South Sarasota County**

Dear George Riley,

March 20, 2024

This is in reply to your letter dated March 18, 2024. It appears that the only confusion is on your part. Let me numerate the FACT's.

As indicated on your copy of the chartering application, the duly elected executive board of Republican Club of South Sarasota, wrote a letter informing the Republican Party of Florida (RPOF) that as of January 03, 2024 due to policy changes the RPOF were about to implement that would indirectly and directly affect our club, we did in fact officially and permanently resign our charter with you. We also informed you that any prior ties, allegiances and agreements were thereby permanently severed and any potential future correspondence pertaining to this withdrawal was unwanted. We informed you that going forward our organization will focus our priorities and support on other initiatives that put our American citizens first and foremost.

Application to be a chartered Republican club by your organization is voluntary, as is the reverse.

Along with our dissolution letter we included our club charter and according to the USPS the letter was received and signed for by your staff on January 8, 2024.

Additionally on February 6, 2024, we received correspondence from you verifying the receipt of our "club dissolution letter". Informing us that you "inadvertently threw it away". Perhaps this is where your confusion stems from.

Regardless, of any perceived confusion on your part, these are the facts and they are indisputable



## **WE SUPPORT**

- **AMERICAS FOUNDING PRINCIPLES**
- **KEEPING AMERICA FIRST**
- **SELF-GOVERNANCE**
- **MAXIMUM FREEDOM**
- **2<sup>ND</sup> AMENDMENT**

Apparently, there are those wishing to form a chartered Republican club using the name of the dissolved RCSSC club. This is not our concern, and I am sure they will have to follow the same charter application process the former RCSSC did.

We hope this clears up any confusion you may have and we appreciate your attention to this matter.

Regards,

James Hoel

A handwritten signature in black ink that reads "James A. Hoel".

President

America First SWFL Caucus, Inc.

America First Southwest Florida Caucus Record of Regular Meeting  
January 10, 2024, 11-1pm Venice Community Center

**Call to Order**

- President Stephenson called the meeting to order at 11:36am.
- Barbara Vaughn opened the meeting with prayer followed by the Pledge of Allegiance led by President Stephenson. Randy Wedin then led everyone in singing “God Bless America”.
- President Stephenson announced there would be no Acceptance of Minutes or Treasurer’s Report.

**Recognized Elected Officials and Candidates**

- Tom Knight, candidate for District 3 County Commissioner, was the first sheriff to deport criminal illegal aliens. He’ll form a task force to look at the impact/cost of illegal immigration and address infrastructure, traffic and the “bloated” budget.
- Michelle Pozzie, candidate for District 74 State Representative, has endorsed Trump for President. She is for constitutional carry, parental rights in education, medical freedom and a limited government that knows its place.
- Clayton Taylor, member Charter Review Board District 4, stated the next Charter Review Board meeting agenda on Jan 24, 1616 Ringling Blvd includes a HOA reform bill, unlawful mandates and Hospital Board position restrictions.

**New Business**

- Our sponsors were recognized and thanked: Big Bam Ebikes, Car Doc, and Coastal Mold & Water Removal.
- Terry Angley, State Committeewoman, provided an update on the January 8<sup>th</sup> special meeting where 200 out of 203 voted to remove Christian Ziegler as RPOF (Republican Party of Florida) chairman. The new chairman is Evan Power, former vice-chair. A new vice-chair will be elected at the next RPOF meeting in February. National Committeeman and Committeewoman, who represent us at the RNC (Republican National Committee), are also up for election.
- Elizabeth Neunder reported that there are 12 HOA bills, aimed at changing the antiquated HOA laws. The strategy is to first send emails and make phone calls, followed by faxes and finally sending people to the floor to testify.
- **Announcement of New Club** - President Stephenson announced the first member meeting of the **America First Southwest Florida Caucus**.
- **Election and Installation of Officers** - Barbara Vaughn, chair of the Nominating Committee, announced that none of the offices was contested as Emilio Carlesimo withdrew from the Vice-President contest. All four officers were elected by unanimous acclamation. Ron Turner, Supervisor of Elections, swore in the 2024 officers of the new club: James Hoel, President; Terry Angley, Vice-President; Donna Defiore, Treasurer; Mary Germani, Secretary.
- **Featured Speaker – Ron Turner, Sarasota County Supervisor of Elections**, announced that he is running for reelection in 2024. Important dates: March 19 is the presidential preference primary. Early voting is March 9 – 17. Florida is a closed primary state so only Republicans can vote and the party registration deadline is February 20<sup>th</sup>. Supervisor Turner reported that his staff has been rearranging precinct boundaries to manage lines at polls in growth spots; 4 precincts and hundreds of poll workers have been added to Sarasota County. Voting equipment has been updated. Florida Statute 101.5604 says precincts must use legislature decided voting system standards. In Sarasota County, we don’t use Dominion machines; we use ES&S out of Omaha, Nebraska. We also are using the Clear audit system that compares ES&S results. Drop boxes, mandated in 2020, are guarded with uninterrupted custody. Zuckerbucks were offered and refused in 2020. Private funds in public elections are now illegal in Florida.

President Stephenson adjourned the meeting at 1:05pm.

Respectively submitted by Mary Germani, AFSWFLC Secretary, March 10, 2024.



# BENTLEY GOODRICH KISON

A COMMERCIAL LITIGATION LAW FIRM

MORGAN R. BENTLEY  
*Managing Shareholder  
Board Certified Business Litigation*

BRIAN D. GOODRICH  
*Shareholder*

AMANDA R. KISON  
*Shareholder  
Board Certified Business Litigation*

CAROLEEN B. BREJ

CORINNA S. COSER

KATLYN N. CRAIG

ASHLEY E. GAILLARD

JENNIFER L. GROSSO

KAYLIN M. HUMERICKHOUSE

DAVID A. WALLACE  
*Board Certified Appellate Law  
and Fla. Certified Mediator*

March 1, 2024

*Via E-Mail to [deftored@gmail.com](mailto:deftored@gmail.com) and U.S. Certified Mail*

Donna K. De Fiore  
Treasurer, Registered Agent  
America First SWFL Causcus, Inc.  
80 Marlin Road  
Venice, FL 34293

**Re: Civil Theft—Republican Club of South Sarasota County**

Dear Ms. De Fiore:

This Firm represents the Republican Club of South Sarasota County (the “Club” or “RCSSC”) regarding the matters set forth herein. As you know, the RCSSC is a club directly chartered by the Republican Party of Florida (“RPOF”). This demand letter is sent to you both in your individual capacity and as the Treasurer and Registered Agent of America First SWFL Causcus, Incorporated.

It is my understanding that, following an unsuccessful attempt at a coup, you and other disgruntled, now-former-members of the Club created a new organization named America First SWFL Causcus Incorporated (hereinafter “America First”). In so doing, you and other collaborators engaged in the intentional, felonious, and malicious act of theft against your former organization, RCSSC. More specifically, you have commandeered RCSSC’s bank account and the sums contained therein, stolen personal Club property and equipment, commandeered the P.O. Box and mail addressed to RCSSC, stolen formal Club documents, commandeered Club domain names, and the social media accounts associated with the Club, among other items.

Notwithstanding your obvious breach of fiduciary duty as the (now former) Treasurer of the Club, you have also engaged in the tort of civil theft. The wrongful theft and retention of the aforementioned property constitutes civil theft in Florida. As a result of this theft, the Club has suffered actual damages in the estimated amount of at least \$21,000.00. This notice is provided to you as a condition precedent for filing an action for civil theft. *See Fla. Stat. Sec. §772.11.* A courtesy copy of said statute is attached hereto for ease of reference. Please be aware that the

Donna K. De Fiore

March 1, 2024

Re: Civil Theft—Republican Club of South Sarasota County.

Page 2

statute authorizes treble damages, bringing the value of the damages and this demand to \$63,000.00.

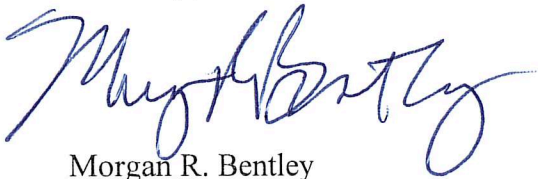
The statute permits you thirty (30) days from receipt of this letter within which to comply with this demand. If you comply, you may be given written release from further civil liability for the civil theft.

Should you accept, your payment of \$63,000.00 should be made out to the Bentley Goodrich Kison Trust Account and delivered to Bentley Goodrich Kison, 783 South Orange Avenue, Third Floor, Sarasota, FL 34236 within thirty (30) days. Should you ignore this letter and fail to make timely payment, RCSSC shall have no alternative than to file an action for civil theft against you for treble damages, inclusive of RCSSC's costs and attorneys' fees.

If you have any questions regarding the foregoing, you may contact me to discuss in further detail. However, you should not consider such a telephone call to suspend the thirty (30) day deadline provided in this letter.

**PLEASE GOVERN YOURSELF ACCORDINGLY.**

Sincerely,



Morgan R. Bentley  
For the Firm

cc: RCSSC

Select Year: 2023 ▼ Go

## The 2023 Florida Statutes (including Special Session C)

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[Title XLV](#)  
TORTS

[Chapter 772](#)  
CIVIL REMEDIES FOR CRIMINAL PRACTICES

[View Entire Chapter](#)

### 772.11 Civil remedy for theft or exploitation.—

(1) Any person who proves by clear and convincing evidence that he or she has been injured in any fashion by reason of any violation of ss. [812.012-812.037](#) or s. [825.103\(1\)](#) has a cause of action for threefold the actual damages sustained and, in any such action, is entitled to minimum damages in the amount of \$200, and reasonable attorney's fees and court costs in the trial and appellate courts. Before filing an action for damages under this section, the person claiming injury must make a written demand for \$200 or the treble damage amount of the person liable for damages under this section. If the person to whom a written demand is made complies with such demand within 30 days after receipt of the demand, that person shall be given a written release from further civil liability for the specific act of theft or exploitation by the person making the written demand. Any person who has a cause of action under this section may recover the damages allowed under this section from the parents or legal guardian of any unemancipated minor who lives with his or her parents or legal guardian and who is liable for damages under this section. Punitive damages may not be awarded under this section. The defendant is entitled to recover reasonable attorney's fees and court costs in the trial and appellate courts upon a finding that the claimant raised a claim that was without substantial fact or legal support. In awarding attorney's fees and costs under this section, the court may not consider the ability of the opposing party to pay such fees and costs. This section does not limit any right to recover attorney's fees or costs provided under any other law.

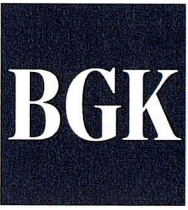
(2) For purposes of a cause of action arising under this section, the term "property" does not include the rights of a patient or a resident or a claim for a violation of such rights.

(3) This section does not impose civil liability regarding the provision of health care, residential care, long-term care, or custodial care at a licensed facility or care provided by appropriately licensed personnel in any setting in which such personnel are authorized to practice.

(4) The death of an elderly or disabled person does not cause the court to lose jurisdiction of any claim for relief for theft or exploitation when the victim of the theft or exploitation is an elderly or disabled person.

(5) In a civil action under this section in which an elderly or disabled person is a party, the elderly or disabled person may move the court to advance the trial on the docket. The presiding judge, after consideration of the age and health of the party, may advance the trial on the docket. The motion may be filed and served with the civil complaint or at any time thereafter.

History.—s. 3, ch. 86-277; s. 47, ch. 88-381; s. 5, ch. 89-303; s. 1181, ch. 97-102; s. 2, ch. 2002-195; s. 8, ch. 2014-200.



**BENTLEY  
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A COMMERCIAL LITIGATION LAW FIRM

**MORGAN R. BENTLEY**  
*Managing Shareholder  
Board Certified Business Litigation*

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**KAYLIN M. HUMERICKHOUSE**

**DAVID A. WALLACE**  
*Board Certified Appellate Law  
and Fla. Certified Mediator*

March 1, 2024

*Via E-Mail to [katjam2020@gmail.com](mailto:katjam2020@gmail.com) and U.S. Certified Mail*

James A. Hoel  
President  
America First SWFL Causcus, Inc.  
242 Piazza Di Luna  
Venice, FL 34285

**Re: Civil Theft—Republican Club of South Sarasota County**

Dear Mr. Hoel:

This Firm represents the Republican Club of South Sarasota County (the “Club” or “RCSSC”) regarding the matters set forth herein. As you know, the RCSSC is a club directly chartered by the Republican Party of Florida (“RPOF”). This demand letter is sent to you both in your individual capacity and as the President of America First SWFL Caucus, Incorporated.

It is my understanding that, following an unsuccessful attempt at a coup, you and other disgruntled, now-former-members of the Club created a new organization named America First SWFL Caucus Incorporated (hereinafter “America First”). In so doing, you and other collaborators engaged in the intentional, felonious, and malicious act of theft against your former organization, RCSSC. More specifically, you have commandeered RCSSC’s bank account and the sums contained therein, stolen personal Club property and equipment, commandeered the Club P.O. Box and the mail addressed to RCSSC, stolen formal Club documents, commandeered the Club domain names, and the social media accounts associated with the Club, among other items.

Notwithstanding your obvious breach of fiduciary duty as the (now former) Vice President of the Club, you have also engaged in the tort of civil theft. The wrongful theft and retention of the aforementioned property constitutes civil theft in Florida. As a result of this theft, the Club has suffered actual damages in the estimated amount of \$21,000.00. This notice is provided to you as a condition precedent for filing an action for civil theft. *See* Fla. Stat. Sec. §772.11. A courtesy copy of said statute is attached hereto for ease of reference. Please be aware that the statute authorizes treble damages, bringing the value of the damages and this demand to \$63,000.00.

James A. Hoel

March 1, 2024

Re: Civil Theft—Republican Club of South Sarasota County.

Page 2

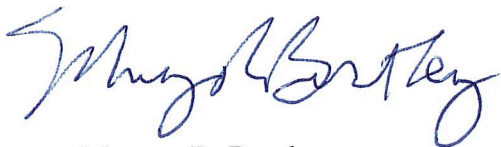
The statute permits you thirty (30) days from receipt of this letter within which to comply with this demand. If you comply, you may be given written release from further civil liability for the civil theft.

Should you accept, your payment of \$63,000.00 should be made out to the Bentley Goodrich Kison Trust Account and delivered to Bentley Goodrich Kison, 783 South Orange Avenue, Third Floor, Sarasota, FL 34236 within thirty (30) days. Should you ignore this letter and fail to make timely payment, RCSSC shall have no alternative than to file an action for civil theft against you for treble damages, inclusive of RCSSC's costs and attorneys' fees.

If you have any questions regarding the foregoing, you may contact me to discuss in further detail. However, you should not consider such a telephone call to suspend the thirty (30) day deadline provided in this letter.

**PLEASE GOVERN YOURSELF ACCORDINGLY.**

Sincerely,

A handwritten signature in blue ink that reads "Morgan R. Bentley". The signature is written in a cursive, flowing style.

Morgan R. Bentley  
For the Firm

Enclosure  
cc: RCSSC

Select Year:

## The 2023 Florida Statutes (including Special Session C)

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[Title XLV](#)  
TORTS

[Chapter 772](#)  
CIVIL REMEDIES FOR CRIMINAL PRACTICES

[View Entire Chapter](#)

### 772.11 Civil remedy for theft or exploitation.—

(1) Any person who proves by clear and convincing evidence that he or she has been injured in any fashion by reason of any violation of ss. [812.012-812.037](#) or s. [825.103\(1\)](#) has a cause of action for threefold the actual damages sustained and, in any such action, is entitled to minimum damages in the amount of \$200, and reasonable attorney's fees and court costs in the trial and appellate courts. Before filing an action for damages under this section, the person claiming injury must make a written demand for \$200 or the treble damage amount of the person liable for damages under this section. If the person to whom a written demand is made complies with such demand within 30 days after receipt of the demand, that person shall be given a written release from further civil liability for the specific act of theft or exploitation by the person making the written demand. Any person who has a cause of action under this section may recover the damages allowed under this section from the parents or legal guardian of any unemancipated minor who lives with his or her parents or legal guardian and who is liable for damages under this section. Punitive damages may not be awarded under this section. The defendant is entitled to recover reasonable attorney's fees and court costs in the trial and appellate courts upon a finding that the claimant raised a claim that was without substantial fact or legal support. In awarding attorney's fees and costs under this section, the court may not consider the ability of the opposing party to pay such fees and costs. This section does not limit any right to recover attorney's fees or costs provided under any other law.

(2) For purposes of a cause of action arising under this section, the term "property" does not include the rights of a patient or a resident or a claim for a violation of such rights.

(3) This section does not impose civil liability regarding the provision of health care, residential care, long-term care, or custodial care at a licensed facility or care provided by appropriately licensed personnel in any setting in which such personnel are authorized to practice.

(4) The death of an elderly or disabled person does not cause the court to lose jurisdiction of any claim for relief for theft or exploitation when the victim of the theft or exploitation is an elderly or disabled person.

(5) In a civil action under this section in which an elderly or disabled person is a party, the elderly or disabled person may move the court to advance the trial on the docket. The presiding judge, after consideration of the age and health of the party, may advance the trial on the docket. The motion may be filed and served with the civil complaint or at any time thereafter.

History.—s. 3, ch. 86-277; s. 47, ch. 88-381; s. 5, ch. 89-303; s. 1181, ch. 97-102; s. 2, ch. 2002-195; s. 8, ch. 2014-200.



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DAVID A. WALLACE  
*Board Certified Appellate Law  
and Fla. Certified Mediator*

March 1, 2024

*Via E-Mail to [murgermani@gmail.com](mailto:murgermani@gmail.com) and U.S. Certified Mail*

Mary L. Germani  
Secretary  
America First SWFL Caucus, Inc.  
242 Piazza Di Luna  
Venice, FL 34285

**Re: Civil Theft—Republican Club of South Sarasota County**

Dear Ms. Germani:

This Firm represents the Republican Club of South Sarasota County (the “Club” or “RCSSC”) regarding the matters set forth herein. As you know, the RCSSC is a club directly chartered by the Republican Party of Florida (“RPOF”). This demand letter is sent to you both in your individual capacity and as the Secretary of America First SWFL Caucus, Incorporated.

It is my understanding that, following an unsuccessful attempt at a coup, you and other disgruntled, now-former-members of the Club created a new organization named America First SWFL Caucus Incorporated (hereinafter “America First”). In so doing, you and other collaborators engaged in the intentional, felonious, and malicious act of theft against your former organization, RCSSC. More specifically, you have commandeered RCSSC’s bank account and the sums contained therein, stolen personal Club property and equipment, commandeered the Club P.O. Box and the mail addressed to RCSSC, stolen formal Club documents, commandeered the Club domain names, and the social media accounts associated with the Club, among other items.

Notwithstanding your obvious breach of fiduciary duty as the (now former) Secretary of the Club, you have also engaged in the tort of civil theft. The wrongful theft and retention of the aforementioned property constitutes civil theft in Florida. As a result of this theft, the Club has suffered actual damages in the estimated amount of \$21,000.00. This notice is provided to you as a condition precedent for filing an action for civil theft. *See Fla. Stat. Sec. §772.11.* A courtesy copy of said statute is attached hereto for ease of reference. Please be aware that the statute authorizes treble damages, bringing the value of the damages and this demand to \$63,000.00.

Mary L. Germani

March 1, 2024

Re: Civil Theft—Republican Club of South Sarasota County.

Page 2

The statute permits you thirty (30) days from receipt of this letter within which to comply with this demand. If you comply, you may be given written release from further civil liability for the civil theft.

Should you accept, your payment of \$63,000.00 should be made out to the Bentley Goodrich Kison Trust Account and delivered to Bentley Goodrich Kison, 783 South Orange Avenue, Third Floor, Sarasota, FL 34236 within thirty (30) days. Should you ignore this letter and fail to make timely payment, RCSSC shall have no alternative than to file an action for civil theft against you for treble damages, inclusive of RCSSC's costs and attorneys' fees.

If you have any questions regarding the foregoing, you may contact me to discuss in further detail. However, you should not consider such a telephone call to suspend the thirty (30) day deadline provided in this letter.

**PLEASE GOVERN YOURSELF ACCORDINGLY.**

Sincerely,

A handwritten signature in blue ink that reads "Morgan R. Bentley". The signature is written in a cursive, flowing style.

Morgan R. Bentley  
For the Firm

Enclosure  
cc: RCSSC

Select Year:

## The 2023 Florida Statutes (including Special Session C)

---

[Title XLV](#)  
TORTS

[Chapter 772](#)  
CIVIL REMEDIES FOR CRIMINAL PRACTICES

[View Entire Chapter](#)

### **772.11 Civil remedy for theft or exploitation.—**

(1) Any person who proves by clear and convincing evidence that he or she has been injured in any fashion by reason of any violation of ss. [812.012-812.037](#) or s. [825.103](#)(1) has a cause of action for threefold the actual damages sustained and, in any such action, is entitled to minimum damages in the amount of \$200, and reasonable attorney's fees and court costs in the trial and appellate courts. Before filing an action for damages under this section, the person claiming injury must make a written demand for \$200 or the treble damage amount of the person liable for damages under this section. If the person to whom a written demand is made complies with such demand within 30 days after receipt of the demand, that person shall be given a written release from further civil liability for the specific act of theft or exploitation by the person making the written demand. Any person who has a cause of action under this section may recover the damages allowed under this section from the parents or legal guardian of any unemancipated minor who lives with his or her parents or legal guardian and who is liable for damages under this section. Punitive damages may not be awarded under this section. The defendant is entitled to recover reasonable attorney's fees and court costs in the trial and appellate courts upon a finding that the claimant raised a claim that was without substantial fact or legal support. In awarding attorney's fees and costs under this section, the court may not consider the ability of the opposing party to pay such fees and costs. This section does not limit any right to recover attorney's fees or costs provided under any other law.

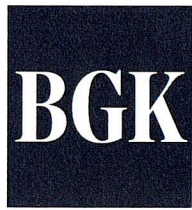
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KAYLIN M. HUMERICKHOUSE

DAVID A. WALLACE  
*Board Certified Appellate Law  
and Fla. Certified Mediator*

March 1, 2024

*Via E-Mail to [tangley4@gmail.com](mailto:tangley4@gmail.com) and U.S. Certified Mail*

Theresa Angley  
Vice President  
America First SWFL Causcus, Inc.  
601 Palomino Circle  
Nokomis, FL 34275

**Re: Civil Theft—Republican Club of South Sarasota County**

Dear Ms. Angley:

This Firm represents the Republican Club of South Sarasota County (the “Club” or “RCSSC”) regarding the matters set forth herein. As you know, the RCSSC is a club directly chartered by the Republican Party of Florida (“RPOF”). This demand letter is sent to you both in your individual capacity and as the Vice President of America First SWFL Caucus, Incorporated.

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Theresa Angley

March 1, 2024

Re: Civil Theft—Republican Club of South Sarasota County.

Page 2

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**PLEASE GOVERN YOURSELF ACCORDINGLY.**

Sincerely,

A handwritten signature in blue ink that reads "Morgan R. Bentley". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Morgan R. Bentley  
For the Firm

cc: RCSSC

Select Year:

## The 2023 Florida Statutes (including Special Session C)

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[Title XLV](#)  
TORTS

[Chapter 772](#)  
CIVIL REMEDIES FOR CRIMINAL PRACTICES

[View Entire Chapter](#)

### **772.11 Civil remedy for theft or exploitation.—**

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CHAIRMAN

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NATIONAL  
COMMITTEEMAN

Joe Gruters  
NATIONAL  
COMMITTEEMAN-ELECT

The George Bush  
Republican Center  
420 East Jefferson Street  
Tallahassee, Florida 32301

Post Office Box 311  
Tallahassee, Florida 32301

Telephone: (850) 222-7920  
Facsimile: (850) 681-0184

March 18, 2024

SENT VIA EMAIL

James Hoel  
Katjam2020@gmail.com

Re: Charter Status; Republican Club of South Sarasota  
County

Dear Mr. Hoel:

I am writing to provide clarification regarding the status of the Republican Club of South Sarasota County (the "Club").

The Club's charter was not terminated and remains in place until March 31, 2025, pursuant to Rule 1 of the RPOF Rules of Procedure, unless the Club submits a charter renewal application on or before March 15, 2025 and subsequently receives approval from the RPOF Chairman.

Thank you for your understanding and cooperation.

With best regards,

George Riley  
Executive Director  
Republican Party of Florida

cc: Evan Power, Chairman, RPOF  
Jack Brill, Chair, Sarasota REC  
Benjamin J. Gibson, RPOF Chief Legal Counsel

Exhibit 5