



Florida Commission on Ethics

P. O. Drawer 15709, Tallahassee, Florida 32317-5709

"A Public Office is a Public Trust"

COMPLAINT

1. PERSON BRINGING COMPLAINT:

Name: Robert Burns Telephone Number: 407-810-3200

Address: 25 West New Havent Ave Suite A

City: Melbourne County: Brevard State: FL Zip Code: 32901

2. PERSON AGAINST WHOM COMPLAINT IS BROUGHT:

Use a separate complaint form for each person you wish to complain against:

Name: Tina Descovich Telephone Number: 321-480-7581

Address: 412 Peregrine Drive

City: Indialantic County: Brevard Zip Code: 32903

Title of office or position held or sought: Florida Commission on Ethics Commissioner

3. STATEMENT OF FACTS:

Please provide a full explanation of your complaint, describing the facts and the actions of the person named above and why you believe he or she violated the law. Include relevant dates and the names and addresses of persons whom you believe may be witnesses. Please do not submit more than 15 pages, including this form. Please do not submit video or audio tapes, CDs, DVDs, flash drives or other electronic media; such material will not be considered part of the complaint and will be returned.

4. OATH

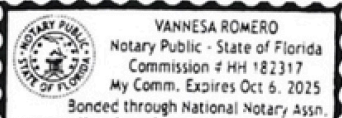
STATE OF Florida

COUNTY OF Brevard

I, the person bringing this complaint, do swear or affirm that the facts set forth in the foregoing complaint and attachments thereto are true and correct to the best of my knowledge and belief.

Sworn to (or affirmed) and subscribed before me by means of ☒ physical presence or ☐ online notarization, this 28 day of Feb., 2024, by Robert W. Burns (name of person making statement)

SIGNATURE OF COMPLAINANT



(Signature of Notary Public)

Vanessa Romero

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

Personally Known ☐ OR Produced Identification ☐

Type of Identification Produced: FL DL



To: Florida Commission on Ethics

Date: February 28, 2024

From: Robert Burns

25 West New Have Ave. Suite A.

Melbourne, FL 32901

Dear Members of the Florida Commission on Ethics,

I am writing to formally lodge an ethics complaint regarding Ms. Tina Descovich, a member of the Florida Commission on Ethics and co-founder of the nonprofit organization, Moms for Liberty and multiple political action committees, both federal and state, under the same name. This complaint is based on concerns that Ms. Descovich's activities with Moms for Liberty constitute lobbying as defined under Florida law, and her failure to register as a lobbyist represents a conflict with her duties as a member of the Ethics Commission. Furthermore, her role potentially violates the Commission's clear directive that "Members are prohibited from lobbying State and local governments."

Background:

Ms. Descovich has been publicly active in efforts to influence legislative action across multiple states, including Florida, to pass a parental bill of rights. She has stated, "I am proud that our Moms for Liberty members are already hard at work in 13 states across the U.S. to pass a parental bill of rights. Next year, we plan to add a dozen more to this list - following in the path of Gov. Ron DeSantis who is a trailblazer on this issue in Florida."¹

Concerns:

- **Violation of Lobbying Laws:** As per the definitions provided by Florida law, lobbying includes influencing or attempting to influence legislative action through communication, which aligns with Ms. Descovich's activities. Given that she is compensated for her role within Moms for Liberty, her actions fall within the scope of "lobbyist" activities that require registration.
- **Definition of Lobbying:** The definition of "lobbying" according to Florida law includes influencing or attempting to influence legislative action or nonaction through oral or written communication. Descovich's statement about working in various states to pass a parental bill of rights directly aligns with efforts to influence legislative action regarding education policies.

¹ Florida Politics Article, 3/26/23, "Moms for Liberty hails House passage of federal Parental Bill of Rights"

- **Direct Involvement in Legislative Influence:** In her statement, Descovich explicitly mentions efforts to influence legislative action across multiple states, mirroring the activities described in the definition of lobbying. By publicly stating the organization's intention to follow in the path of legislative actions similar to those advocated by Gov. Ron DeSantis in Florida, she acknowledges a direct engagement in activities aimed at influencing legislative policies and actions. Their own website provides chapters with how-to guides on influencing legislation and policy in their areas of operation.

PARENTAL RIGHTS MODEL POLICIES

LEGISLATION

Work to get a Parental Bill of Rights passed in your state using the model policy from the Parental Rights Foundation linked below.

[PARENTAL BILL OF RIGHTS](#)

RESOLUTIONS

Have you taken the [Parent Pledge](#) and are ready to put it into action?

Grow the groundswell of support for fundamental parental rights by getting your School Board to adopt one of the following resolutions tailored by state.

For states with legislation that defines and protects parental rights, you will find resolutions that reference those specific state laws. For states without that crucial legislation, a general resolution has been provided that references Constitutional case law.

RESOLUTION IMPLEMENTATION



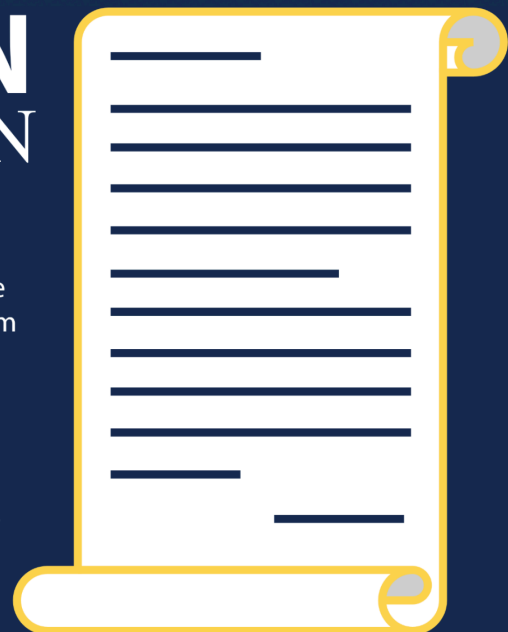
INVITE

Contact your local school board representative and share the resolution with them. Invite them to lead the charge on adopting the resolution for their board.



FOLLOW UP

Follow up with board members. Invite Chapter or community members to speak about the resolution during public comment.



ADAPTATION: Want to use this resolution with your city council, county commission, or other board? Simply replace 'School Board' with the name of the entity adopting the resolution!

- **Economic Consideration and Compensation:** The addition that Descovich is paid a salary by Moms for Liberty brings her activities under the umbrella of the "lobbyist" definition. This definition encompasses individuals who receive payment or economic consideration for the purpose of lobbying. Since Descovich's statement reflects an organized effort to influence legislative action and she receives compensation from the organization leading these efforts, this aligns with the notion of a paid lobbyist.
- **The Lobbying Disclosure Act (LDA)** defines a lobbyist as someone making more than one lobbying contact and spending more than 20% of their time on lobbying activities. Moms for Liberty's on IRS Form 990 shows that Descovich spends 40 hours per week on these activities, far exceeding the 20% threshold.

(A) Name and title	(B) Average hours per week (list any hours for related organizations below dotted line)	(C) Position (do not check more than one box, unless person is both an officer and a director/trustee)						(D) Reportable compensation from the organization (W-2/1099-MISC/1099-NEC)	(E) Reportable compensation from related organizations (W-2/1099-MISC/1099-NEC)	(F) Estimated amount of other compensation from the organization and related organizations
		Individual trustee or director	Institutional Trustee	Officer	Key employee	Highest compensated employee	Former			
(1) MARIE ROGERSON Director/Director of Program Development	40.0	X		X				50,251	0	0
(2) TIFFANY JUSTICE Director/Co-Founder	40.0	X		X				44,250	0	0
(3) TINA DESCOVICH Executive Director/Co-Founder	40.0	X		X				50,140	0	6,026

(Moms for Liberty 2022 Form 990 Part VII Compensation of Officers, Directors, Trustees, Key Employees, Highest Compensated Employees, and Independent Contractors)

- **Organizational Role:** As a co-founder and a salaried member of Moms for Liberty, Descovich represents the organization in its efforts to influence educational policies through legislative means. This role fits within the "lobbyist" definition of someone employed or contracted for economic consideration to lobby on behalf of another person or entity. Given that Moms for Liberty's activities involve advocating for specific legislative outcomes (parental bills of rights), and Descovich is compensated for her role in these efforts, it positions her within the framework of a lobbyist.
- **Public Advocacy and Influence:** Descovich's statement about plans to expand their legislative influence efforts further highlights the ongoing nature of their lobbying activities. Lobbyists often work to create goodwill among legislators and the public for their causes, which is in line with Descovich's celebration of

the organization's mission and its alignment with certain elected representatives' focus on parental rights in education.

- **Conflict of Interest:** Ms. Descovich's involvement in lobbying activities while serving on the Ethics Commission raises significant ethical concerns, including potential conflicts of interest that could undermine the integrity and public trust in the Commission.
- In her closing statement at the 2/26/24 Senate Committee Hearing on her confirmation, she stated, "The work that I do with the organization that I founded and as the executive director **is independent and separate** from the role on the ethics commission. **This is a position that is important to hold elected leaders accountable.** And I think **that is the most important role in the state of Florida right now.**" Although she states that the work she does for Moms for Liberty is separate and independent from her role on the Ethics Commission, her own definition of her role for both positions is identical. It is unreasonable to believe that she is able to separate the two.

How We Fight

➔ Hold Leaders Accountable

We hold decision makers accountable or we work to replace them with liberty-minded individuals.

➔ Promote Liberty

We promote teaching the principles of liberty in our homes and community.

➔ Spread Awareness

We spread awareness and an understanding of the limited role of government.

➔ Engage on Key Issues

We engage our communities and elected leaders on key issues impacting our families.

➔ Oppose Government Overreach

We stand together against government overreach and intimidation tactics.

➔ Activate to Public Service

We activate liberty-minded leaders to serve in elected positions.

[JOIN THE FIGHT TODAY!](#)

Our Founders

Our founders are Tiffany and Tina, moms on a mission to stoke the fires of liberty. As former school board members, they witnessed how short-sighted and destructive policies directly hurt children and families. Now they are using their first-hand knowledge and experience to unite parents who are ready to fight those that stand in the way of liberty.



- The bill sponsor for HB 1557, commonly known as the “Don’t Say Gay” bill Representative Joe Harding, said Moms for Liberty members effectively warned lawmakers who opposed it that they would be **"held accountable"** in their districts. "They were a huge encouragement to me," said Harding, a who spoke at a dinner organized by the group after the bill becoming law.²
- Descovich was asked specifically about an open ethics case against State Representative Randy Fine for his abuse of office which the Ethics Commission found probable cause. Descovich will be deciding on the outcome of this case. She was asked during her 2/26/24 confirmation hearing by Senator Polsky what her relationship with Randy Fine was and if she would need to recuse herself from that case. Descovich responded, under oath, that she became friends with Randy Fine in 2016 while they were both running for office. She stated that was the extent of their relationship and she saw no reason that she would need to recuse herself from that case. What she didn't disclose however is that Fine has given thousands of dollars directly to her organization, advocated for others to do so, and has participated in many press conferences and meetings on behalf of Moms for Liberty. He has advocated for Moms for Liberty in lawsuits against Brevard Public Schools and fundraised for those lawsuits. These omissions, either intentional or by simply forgetting, illustrate the lack of judgement by Mrs. Descovich, the conflict of her holding this position, and the potential abuse and/or perception of it, in an actual case currently being decided. It is without question that she would need to recuse herself from this case as she has benefited personally from the documented financial support of Randy Fine who contributes to the funds of which she is paid.



² Reuters Article 4/6/22 - From school boards to statehouses, conservative Moms for Liberty push to grow influence

**State Representative Randy Fine** 

February 24, 2022 · 

We are in the battle of our time between those who believe government should protect children from their parents and those who believe parents should protect their children from government. I stand with parents. Have a listen to my five minute speech this morning to the [Moms for Liberty - Brevard, FL - Public Page](#) outside the capitol.



  196

49 comments 30 shares

**State Representative Randy Fine** 

June 21, 2021 · 

BREAKING: I will be making a major announcement with [Moms for Liberty - Brevard, FL](#) on Friday morning. Stay tuned for details.


  226

100 comments 15 shares



FLORIDATODAY.COM


Moms for Liberty: This isn't a political stunt; it's about our children's futures | Opinion

  106

33 comments 14 shares

Candidate/Committee	Date	Amount	Payee Name
Conservatives for Good Government (PAC)	05/25/2021	2,000.00	MOMS FOR LIBERTY INC.
Sirois, Tyler (REP)(STR)	05/28/2021	1,000.00	MOMS FOR LIBERTY
Fine, Randy (REP)(STR)	06/08/2021	2,000.00	MOMS FOR LIBERTY
James, Gerry (REP)(STS)	08/01/2022	100.00	MOMS FOR LIBERTY-FLAGLER COUNTY
Friends of Tim Diesel (PAC)	09/29/2023	1,000.00	MOMS FOR LIBERTY FLORIDA


- Representative Fine's casino business partner and Legislative Aide, Joe Howard currently resides with Ms. Descovich's sister Jennifer Dunn just a few miles from her home. To say that Ms. Descovich downplayed her relationship to Randy Fine while under oath before the Florida Senate is an understatement at best.





Tina Chwazik Descovich
 4.8K friends · 363 mutual


[Posts](#)
[About](#)
[Friends](#)
[Photos](#)
[Videos](#)
[Check-ins](#)
[More ▾](#)

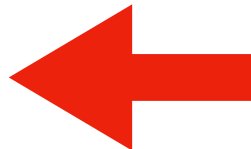
About
 Overview
 Work and education
 Places lived
 Contact and basic info
Family and relationships
 Details About Tina
 Life events

Relationship
 **Derek Descovich**
 Married to Derek Descovich


Family members
 **Braden Spurlock**
 Son

 **Jennifer Dunn**
 Sister


 **Aric Dunn**
 Brother





Close
Dunn, Jennifer Lynn


321-757-0291



132 SE 4th St
Satellite Beach, FL 32937

 Voter Info **81 91**

 Contact Info

 132 SE 4th St



 Howard, Joseph Cameron

58yr

REP 93/94

 Dunn, Jennifer Lynn

45yr

REP 81/91



Tallahassee Office:
Suite 1401, The Capitol
402 South Monroe Street
Tallahassee, FL 32399-1300
(850) 717-5053
Randy.Fine@myfloridahouse.gov



Randy Fine
Florida House of Representatives
State Representative, District 53

Legislative Aide
Joe Howard
Joseph.Howard@myfloridahouse.gov



Joseph Howard

Joe Howard has more than 20 years of gaming operations experience and prior to re-joining FPG in 2013, served as an Executive Director for Wynn Resorts. Prior to that, he was a Vice President with The Fine Point Group and a Las Vegas Regional Vice President for Caesars Entertainment (formerly Harrah's Entertainment). Joe has extensive experience in organizational management, having been responsible for more than 500 line-level employees at nine Las Vegas Strip properties as well as providing corporate leadership for Caesars. Joe was Harrah's liaison to the FBI, Secret Service, and Nevada

- Moreover, the intricacies of financial contributions through political action committees (PACs) add another layer of complexity. The possibility of money being funneled to Moms for Liberty via PACs, effectively laundering contributions to obscure their origin, further exacerbates concerns regarding the ability to ensure unbiased ethical oversight. Additionally, because each chapter of Moms for Liberty (of which there are hundreds) has its own independent non-profit corporation, it adds another layer of obscurity to transparency in this context. In short, an individual appearing before the Ethics Commission could literally give \$1,000,000 to Moms for Liberty through several means, and the public has no way of knowing.
- **Prohibition Against Commission Members Lobbying:** The organizational statement of the Florida Commission on Ethics explicitly prohibits members from lobbying state and local governments. Ms. Descovich's activities and role within Moms for Liberty appear to contravene this prohibition.

**State of Florida
COMMISSION ON ETHICS**

**325 John Knox Road, Building E, Suite 200
P.O. Drawer 15709
Tallahassee, FL 32317-5709**

STATEMENT OF ORGANIZATION AND OPERATION

THE COMMISSION'S COMPOSITION; APPOINTMENTS

The Florida Commission on Ethics is composed of nine members. Five of these members are appointed by the Governor, no more than three of whom are from the same political party, subject to confirmation by the Senate. One member appointed by the Governor is a former city or county official and may be a former member of a local planning or zoning board which only has advisory duties. Two members are appointed by the Speaker of the House, each being from different political parties, and two by the President of the Senate, each being from different political parties. No member holds any public employment. All members serve two-year terms and may not serve more than two full terms in succession; however, members may continue to serve after their term expires, until a replacement is appointed. Members are prohibited from lobbying State and local governments.

The agency head is the entire Commission, which is responsible for final agency action. A Chair is selected from among the members to serve a one-year term and may not succeed himself or herself. The Chair has been delegated authority to act for the Commission in certain, limited situations. The Chair may appoint special or standing committees. Members of the Commission do not receive a salary, but do receive reimbursement for travel and per diem expenses while on official Commission business.

- The activities and organizational goals of Moms for Liberty, as detailed on their website, provide substantial evidence to support the argument that their operations align closely with the definitions of lobbying. Their explicit mission to "organize, educate, and empower parents to defend their parental rights at all levels of government" underlines a strategic aim to influence policy and legislative environments.
- The structure of Moms for Liberty, including initiatives to start chapters and the comprehensive guidance provided for doing so, illustrates a nationwide effort to engage in policy influence. The requirements for starting a chapter emphasize strong leadership and communication skills, underlining the organization's intention to have a significant impact on local school boards and, by extension, local education policy.
- Moreover, the Joyful Warriors National Summit is a key event that brings together members for training, strategizing, and empowerment on issues impacting families and education. This summit is described as a gathering to "turn this ship around," with a focus on meeting and collaborating with others fighting for the

future of America, which suggests a concerted effort to shape public policy and education standards.

- These elements—organizational mission, the structured effort to influence local education boards, and national gatherings aimed at strategizing and empowering members to effect change—mirror activities traditionally associated with lobbying. While Moms for Liberty identifies as an organization advocating for parental rights, the systematic and organized approach to influencing public policy and legislative action at all levels of government suggests that their activities could be construed as lobbying. This distinction is critical, as it highlights the organization's direct engagement in efforts to change or influence public policy and legislative outcomes, a hallmark of lobbying activities.
- Advocacy vs. Lobbying: The distinction between advocacy and lobbying is nuanced but critical. While advocacy can encompass general support or opposition to causes, lobbying specifically targets legislative or regulatory action. Moms for Liberty's activities, particularly those aimed at influencing school board policies and educational content, cross into lobbying territory, especially when they seek to change or enact policies or laws, while members are being paid a salary to do so.
- Educational Purpose: While Descovich may claim Moms for Liberty's purpose is educational, the specific targeting of legislation, school board policies, and educational content suggests a direct intent to influence public policy and legislative outcomes. Education that systematically seeks to alter or advocate for specific legislative or policy changes under the guise of informing the public is considered lobbying.
- The direct involvement of Moms for Liberty in political campaigns and their engagement with high-profile political figures, including efforts to influence school board elections and the content of educational material, aligns more closely with the actions of a lobbying entity aiming to effect political and legislative change.
- The Moms for Liberty Political Action Committee registered with the state of Florida has given thousands of dollars to current elected officials during their campaigns, as well as candidates who were not successful. Each of these individuals has the potential to appear before the Ethics Commission to be judged by an individual who has financially supported them as the Chair of the PAC that did so.
- The largest, single donor (\$50,000) to Descovich's PAC is Julie Fancelli who is well known as a heiress of Publix, and her large monetary donations to influence political activities in Florida and the nation. Descovich then used those funds to fund dozens of political campaigns throughout the state.

STATEMENT OF ORGANIZATION OF POLITICAL COMMITTEE (PLEASE TYPE)		RECEIVED OFFICE USE ONLY DEPARTMENT OF STATE 2021 DEC 15 AM 11:26 DIVISION OF ELECTIONS TALLAHASSEE FL	
1. Full Name of Committee MOM'S FOR LIBERTY FLORIDA		Telephone 941-488-7794	
Mailing Address (include city, state and zip code) 133 HARBOR DR S VENICE, FL 34285			
Street Address (include city, state and zip code) 133 HARBOR DR S VENICE, FL 34285			
2. Affiliated or Connected Organizations (includes other committees of continuous existence and political committees)			
Name of Affiliated or Connected Organization	Mailing Address	Relationship	
N/A			
3. Area, Scope and Jurisdiction of the Committee To support or oppose candidates for statewide, multi-county, legislative or local office and other activities not prohibited by Chapter 106 Florida Statute			
4. Nature of Organization or Organization's Special Interest (e.g., medical, legal, education, etc.) <div style="font-size: 1.5em; font-weight: bold;">Political</div>			
5. Identify by Name, Address and Position, the Custodian of Books and Accounts (include treasurer's name)			
Full Name	Mailing Address	Committee Title or Position	
ERIC ROBINSON	133 HARBOR DR S VENICE, FL 34285	TREASURER	

6. List by Name, Address and Position, Other Principal Officers, Including Officers and Members of the Finance Committee, If Any (include chairman's name)			
Full Name	Mailing Address	Committee Title or Position	
TINA DESCOVICH	133 HARBOR DR S VENICE, FL 34285	CHAIRMAN	
7. List by Name, Address, Office Sought and Party Affiliation Each Candidate or Other Individual that this Committee is Supporting (if none, please indicate)			
Full Name	Mailing Address	Office Sought	Party
TO BE DETERMINED			
8. List Any Issues this Committee is Supporting: TO BE DETERMINED List Any Issues this Committee is Opposing: TO BE DETERMINED			
9. If this Committee is Supporting the Entire Ticket of a Party, Give Name of Party			
N/A			
10. In the Event of Dissolution, What Disposition will be Made of Residual Funds?			
Contribute to Candidates, Political Parties, Political Committees			
11. List all Banks, Safety Deposit Boxes, or Other Depositories Used for Committee Funds			
Name of Bank or Depository & Account Number		Mailing Address	
SUNTRUST BANK		1670 South Venice Bypass VENICE, FL 34293	
12. List all Reports Required to be Filed by this Committee with Federal Officials and the Names, Addresses and Positions of Such Officials, If Any			
Report Title	Dates Required to be Filed	Name & Position of Official	Mailing Address
FORM 8871 FORM 1120POL FORM 990 AS MAY BE REQUIRED	UPON FORMATION MAR 15-ANNUALLY MAY 15-ANNUALLY	INTERNAL REVENUE SERVICE	OGDEN UT 84201
STATE OF <u>FLORIDA</u>		<u>SARASOTA</u> COUNTY	
I, <u>TINA DESCOVICH</u> , certify that the information in this Statement of			
Organization is complete, true and correct.			
X <u>Tina Descovich</u> Signature of Chairman of Political Committee		<u>12/7/2022</u> Date	

2022	P2	06/28/2022	43.50	WEBELECT	10150 HIGHLAND MANOR DR STE 20	TAMPA, FL 33610	FINANCE SOFTWARE
2022	P2A	07/03/2022	500.00	ROBINSON GRUTERS & ROBERTS	133 HARBOR DR S	VENICE, FL 34285	ACCOUNTING SERVICE
2022	P2A	07/05/2022	9.58	ANEDOT	PO BOX 94314	BATON ROUGE, LA 70804	CC PROCESSING FEE
2022	P2A	07/07/2022	112.21	DELUXE	PO BOX 419059	RANCHO CORDOVA, CA 95741	CHECKING SUPPLIES
2022	P2A	07/08/2022	23.30	ANEDOT	PO BOX 94314	BATON ROUGE, LA 70804	CC PROCESSING FEE
2022	P3	07/11/2022	23.46	ROBINSON GRUTERS & ROBERTS	133 HARBOR DR S	VENICE, FL 34285	REIMB FED EX
2022	P3	07/12/2022	250.00	ALEXANDRIA SUAREZ CAMPAIGN	133 VALOIS BLVD	KEY LARGO, FL 33037	CONTRIBUTION MONROE CO SB DIST 5
2022	P3	07/12/2022	250.00	ALY LEGGE CAMPAIGN	12407 BALLENTRAE FOREST DR	RIVERVIEW, FL 33579	CONTRIBUTION HILLSBORO CO SB DIST 6
2022	P3	07/12/2022	250.00	AMY PRITCHETT CAMPAIGN	4994 SE HORSESHOE POINT RD	STUART, FL 34997	CONTRIBUTION MARTIN CO SB DIST 4
2022	P3	07/12/2022	250.00	APRIL CARNEY CAMPAIGN	13815 ADMIRALS BEND DR	JACKSONVILLE, FL 32225	CONTRIBUTION DUVAL CO SB DIST 2
2022	P3	07/12/2022	250.00	ASHLEY GILHOUSEN	825 ARTHUR MOORE DR	GREEN COVE SPRINGS, FL 32043	CONTRIBUTION CLAY CO SB DIST 5
2022	P3	07/12/2022	250.00	BRIDGET ZIEGLER CAMPAIGN	133 HARBOR DR S	VENICE, FL 34285	CONTRIBUTION SARASOTA CO SB DIST 1
2022	P3	07/12/2022	250.00	CHRISTY CHONG CAMPAIGN	27 ZAUN TRL	PALM COAST, FL 32164	CONTRIBUTION FLAGLER CO SB DIST 4
2022	P3	07/12/2022	250.00	DANIEL FISCHER CAMPAIGN	9966 SW 19TH LN	GAINESVILLE, FL 32607	CONTRIBUTION ALACHUA CO SB DIST 1
2022	P3	07/12/2022	250.00	DAWN PETERS CAMPAIGN	PO BOX 20252	SAINT PETERSBURG, FL 33742	CONTRIBUTION PINELLAS CO SB DIST 3
2022	P3	07/12/2022	250.00	DEBBIE MANN CAMPAIGN	1180 SUN GROVE LN	SAINT CLOUD, FL 34771	CONTRIBUTION OSCEOLA CO SB DIST 5
2022	P3	07/12/2022	250.00	DEBORAH BAUER CAMPAIGN	423 EAGLE CIR	CASSELBERRY, FL 32707	CONTRIBUTION SEMINOLE CO SB DIST 1
2022	P3	07/12/2022	250.00	ERIN SKIPPER CAMPAIGN	4753 RAGGEDY POINT RD	FLEMING ISLAND, FL 32003	CONTRIBUTION CLAY CO SB DIST 1
2022	P3	07/12/2022	250.00	GORDON PORTER CAMPAIGN	2264 COY BURGESS LOOP	DEFWINTAK SPRINGS, FL 32435	CONTRIBUTION WALTON CO SB DIST 3
2022	P3	07/12/2022	250.00	JACQUELINE ROSARIO CAMPAIGN	1325 SCARLET OAK CIR	VERO BEACH, FL 32966	CONTRIBUTION INDIAN RIVER CO SB DIST 2
2022	P3	07/12/2022	250.00	JAMIE HAYNES CAMPAIGN	30 MORNING GLORY DR	DEBARY, FL 32713	CONTRIBUTION VOLUSIA CO SB DIST 1
2022	P3	07/12/2022	250.00	JENNIFER ARGUELLO CAMPAIGN	2630 CHATHAM CIR	KISSIMWEE, FL 34746	CONTRIBUTION OSCEOLA CO SB DIST 1
2022	P3	07/12/2022	250.00	JILL WOOLBRIGHT CAMPAIGN	1 ANGELA DR	PALM COAST, FL 32164	CONTRIBUTION FLAGLER CO SB DIST 1
2022	P3	07/12/2022	250.00	KATYE CAMPBELL CAMPAIGN	1737 ATTILBURGH BLVD	MELBOURNE, FL 32904	CONTRIBUTION BREVARD CO SB DIST 5
2022	P3	07/12/2022	250.00	KIM SHORT CAMPAIGN	6089 SPRUCE POINT CIR	PORT ORANGE, FL 32128	CONTRIBUTION VOLUSIA CO SB DIST 3
2022	P3	07/12/2022	250.00	LANCE ALRED CAMPAIGN	59 CHRISTOPHER CT	PALM COAST, FL 32137	CONTRIBUTION FLAGLER CO SB DIST 2
2022	P3	07/12/2022	250.00	LORI KIM ALHADEFF	8675 WATERCREST CIR W	POMPAÑO BEACH, FL 33076	CONTRIBUTION BROWARD CO SB DIST 4
2022	P3	07/12/2022	250.00	MEGAN WRIGHT CAMPAIGN	5121 BRIDGE RD	COCOA, FL 32927	CONTRIBUTION BREVARD SB DIST 1
2022	P3	07/12/2022	250.00	MERCEYDES CYDIA MORASSI CAMPAIGN	3451 NE 14TH TER	POMPAÑO BEACH, FL 33064	CONTRIBUTION BREVARD CO SB DIST 7
2022	P3	07/12/2022	250.00	MICHAEL HASON CAMPAIGN	284 FOXTAIL AVE	MIDDLEBURG, FL 32068	CONTRIBUTION CLAY CO SB DIST 4
2022	P3	07/12/2022	250.00	MILDRED RUSSELL CAMPAIGN	3531 NW 35TH PL	GAINESVILLE, FL 32605	CONTRIBUTION ALACHUA CO SB DIST 2
2022	P3	07/12/2022	250.00	MINDY BREWSTER CAMPAIGN	PO BOX 700038	SAINT CLOUD, FL 34770	CONTRIBUTION OSCEOLA CO SB DIST 4
2022	P3	07/12/2022	250.00	MONICA COLUCCI CAMPAIGN	14200 SW 18TH ST	MIAMI, FL 33175	CONTRIBUTION MIAM DADE CO SB DIST 8
2022	P3	07/12/2022	250.00	MONTY FLOYD CAMPAIGN	PO BOX 12213	BROOKSVILLE, FL 34603	CONTRIBUTION HERNANDO SB DIST 5
2022	P3	07/12/2022	250.00	NATALIE-INGRID LYNCH-WALSH CAMPAIGN	1250 NW 98TH AVE	FORT LAUDERDALE, FL 33322	CONTRIBUTION BROWARD SB DIST 5
2022	P3	07/12/2022	250.00	RACHEAL HAND CAMPAIGN	62 LAMBERT RD	SAINT JOHNS, FL 32259	CONTRIBUTION ST JOHN CO SB DIST 1
2022	P3	07/12/2022	250.00	RAY HOLT CAMPAIGN	23120 N STATE ROAD 121	ALACHUA, FL 32615	CONTRIBUTION ALACHUA CO SB DIST 3
2022	P3	07/12/2022	250.00	RITA BALDWIN CAMPAIGN	66 PHOENETIA DR	SAINT AUGUSTINE, FL 32086	CONTRIBUTION ST JOHN CO SB DIST 3
2022	P3	07/12/2022	250.00	STEPHANIE MEYER CAMPAIGN	PO BOX 20252	SAINT PETERSBURG, FL 33742	CONTRIBUTION PINELLAS CO SB DIST 6
2022	P3	07/12/2022	250.00	TIM ENOS	133 HARBOR DR S	VENICE, FL 34285	CONTRIBUTION SARASOTA CO SB DIST 5
2022	P3	07/12/2022	250.00	YVONNE LOCK CAMPAIGN	205 GRAY OWL PT	PONTE VEDRA, FL 32081	CONTRIBUTION ST JOHN CO SB DIST 4
2022	P5	07/29/2022	3.60	ANEDOT	PO BOX 94314	BATON ROUGE, LA 70804	CC PROCESSING FEE
2022	P6	08/01/2022	500.00	ROBINSON GRUTERS & ROBERTS	133 HARBOR DR S	VENICE, FL 34285	ACCOUNTING SERVICE
2022	P7	08/12/2022	250.00	AGAR QUINONES-ARISTONE CAMPAIGN	PO BOX 471064	LAKE MONROE, FL 32747	CONTRIBUTION SEMINOLE CO SB DIST 5
2022	P7	08/12/2022	250.00	AL HERNANDEZ CAMPAIGN	PO BOX 864	ZEPHYRHILLS, FL 33539	CONTRIBUTION PASCO CO SB DIST 1
2022	P7	08/12/2022	250.00	ARMOR PERSONS CAMPAIGN	10240 DEAL RD	NORTH FORT MYERS, FL 33917	CONTRIBUTION LEE CO SCHOOL BOARD DIST 5
2022	P7	08/12/2022	250.00	CHAD CHOATE CAMPAIGN	5708 31ST CT E	BRADENTON, FL 34203	CONTRIBUTION MANATEE CO SB DIST. 4
2022	P7	08/12/2022	250.00	CINDY SPRAY CAMPAIGN	4407 30TH AVE E	BRADENTON, FL 34208	CONTRIBUTION MANATEE CO SB DIST. 5
2022	P7	08/12/2022	250.00	COLONEL RICHARD TATEM CAMPAIGN	6822 HONEYSUCKLE TRL	BRADENTON, FL 34202	CONTRIBUTION MONROE CO SB DIST 1
2022	P7	08/12/2022	250.00	DARREN HORAN CAMPAIGN	2224 SEIDENBERG AVE	KEY WEST, FL 33040	CONTRIBUTION SEMINOLE CO SB DIST 2
2022	P7	08/12/2022	250.00	ERIC MONTE CAMPAIGN	5820 RED BUG LAKE RD # 205	WINTER SPRINGS, FL 32708	CONTRIBUTION VOLUSIA CO SB DIST 5
2022	P7	08/12/2022	250.00	FRED LOWRY CAMPAIGN	58 PERRY LN	DELTONA, FL 32725	CONTRIBUTION BREVARD CO SB DIST 2
2022	P7	08/12/2022	250.00	GENE TRENT CAMPAIGN	340 S BREVARD AVE	COCOA BEACH, FL 32931	CONTRIBUTION HERNANDO CO SB DIST 1
2022	P7	08/12/2022	250.00	JENNIFER LICATA CAMPAIGN	3781 BRAMBLEWOOD LOOP	SPRING HILL, FL 34609	CONTRIBUTION DUVAL CO SB DIST 6
2022	P7	08/12/2022	250.00	JOYCE CHARLOTTE CAMPAIGN	1099 VICTORY LAKE DR	JACKSONVILLE, FL 32221	CONTRIBUTION HILLSBORO CO SB DIST 4
2022	P7	08/12/2022	250.00	PATRICIA RENDON CAMPAIGN	2227 LONGMORE CIR	VALRICO, FL 33596	CONTRIBUTION PUTNAM CO SB DIST 5
2022	P7	08/12/2022	250.00	PHIL LEARY CAMPAIGN	6052 SILVER LAKE DR	PALATKA, FL 32177	CONTRIBUTION MIAM DADE CO DIST 4
2022	P7	08/12/2022	250.00	ROBERTO ALONSO CAMPAIGN	2600 S DOUGLAS RD STE 800	MIAMI, FL 33134	CONTRIBUTION LEE CO SCHOOL BOARD DIST 1
2022	P7	08/12/2022	250.00	SAM FISHER CAMPAIGN	2228 CAPE HEATHER CIR	CAPE CORAL, FL 33991	CONTRIBUTION MIAM DADE CO SB DIST 6
2022	P7	08/12/2022	250.00	SANDRA MANZIERI CAMPAIGN	1760 SW 23RD TER	MIAMI, FL 33145	CONTRIBUTION HERNANDO SB DIST 3
2022	P7	08/12/2022	250.00	SHANNON RODRIGUEZ CAMPAIGN	11355 KNUCKEY RD	BROOKSVILLE, FL 34614	CONTRIBUTION HILLSBORO CO SB DIST 2
2022	P7	08/12/2022	250.00	STACY HAHN CAMPAIGN	3060 S DALE MABRY HWY	TAMPA, FL 33629	CONTRIBUTION HENDRY CO SB DIST 4
2022	P7	08/12/2022	250.00	STEPHANIE BUSIN CAMPAIGN	429 ROYAL PALM AVE	CLEWISTON, FL 33440	CONTRIBUTION INDIAN RIVER CO SB DIST 4
2022	P7	08/12/2022	250.00	THOMAS KENNY CAMPAIGN	2016 13TH AVE SW	VERO BEACH, FL 32962	TEXTING SERVICE
2022	G1A	08/30/2022	21,357.54	MICRO TARGETED MEDIA	PO BOX 51963	SARASOTA, FL 34232	CONTRACT SERVICE
2022	G1A	08/30/2022	375.00	SPURLOCK BRADEN	268 E 29TH ST	BUENA VISTA, VA 24416	ACCOUNTING SERVICE
2022	G1A	09/01/2022	350.00	ROBINSON GRUTERS & ROBERTS	133 HARBOR DR S	VENICE, FL 34285	ACCOUNTING SERVICE
2022	G4	10/05/2022	350.00	ROBINSON GRUTERS & ROBERTS	133 HARBOR DR S	VENICE, FL 34285	REFUND CUT OFF CONTRIBUTION PRIMARY
2022	D4	10/31/2022	-250.00	AGAR QUINONES-ARISTONE CAMPAIGN	PO BOX 471064	LAKE MONROE, FL 32747	ACCOUNTING SERVICE
2022	D5	11/01/2022	350.00	ROBINSON GRUTERS & ROBERTS	133 HARBOR DR S	VENICE, FL 34285	TEXTING SERVICE
2022	M11	11/07/2022	11,995.90	TOP LOBSTER	6708 HERITAGE LN	BRADENTON, FL 34209	ACCOUNTING SERVICE
2022	M12	12/01/2022	350.00	ROBINSON GRUTERS & ROBERTS	133 HARBOR DR S	VENICE, FL 34285	ACCOUNTING SERVICE
2023	M1	01/02/2023	350.00	ROBINSON GRUTERS & ROBERTS	133 HARBOR DR S	VENICE, FL 34285	FINANCE SOFTWARE RENEWAL
2023	M2	02/21/2023	100.00	WEBELECT	10150 HIGHLAND MANOR DR STE 20	TAMPA, FL 33610	BANK FEE
2023	M3	03/21/2023	3.00	TRUIST	1670 US 41 BYPASS S	VENICE, FL 34293	BANK FEE
2023	Q4	10/23/2023	22.00	TRUIST	1670 US 41 BYPASS S	VENICE, FL 34293	

50,569.09

- Based on the activities and statements from Tina Descovich and Moms for Liberty, her are several instances that align with the definitions of lobbying activities as previously discussed. Tina Descovich's active involvement and leadership in Moms for Liberty and its multiple entities demonstrate a concerted effort to influence educational policy and legislation, which is a cornerstone of lobbying activities.
- Advocacy Against COVID-19 Health Safety Measures:** Moms for Liberty began by campaigning against COVID-19 related health safety restrictions in schools, challenging mask mandates and associated policies.

Descovich's discussions about parental choice in the context of COVID-19 measures reflect efforts to influence public policy and legislative action.

2. **Curriculum Complaints and Legal Actions:** The organization has been involved in specific complaints and legal actions regarding school curricula, notably challenging the inclusion of certain educational content. For instance, the Williamson County chapter of Moms for Liberty complained to Tennessee's Department of Education about curriculum violations related to critical race theory, which demonstrates a direct attempt to influence educational policy.
 3. **Harassment and Threats Toward Educational Officials:** Although Descovich and Moms for Liberty publicly denounce inappropriate behavior and threats, the organization's members have been accused of engaging in actions that could be seen as attempts to intimidate or influence school board members and educators. This includes filing lawsuits and opposing viewpoints during meetings, which could be perceived as leveraging pressure to influence educational decisions.
 4. **Book Banning Efforts:** Moms for Liberty has been actively involved in efforts to remove books from school libraries based on content objections. Their activities have led to the removal of books deemed inappropriate, changes in individual school district policies and state law, reflecting a significant influence over educational materials and school policies.
 5. **Opposition to LGBT Rights:** The organization's stance and activities against LGBT rights and gender-affirming health care measures illustrate attempts to influence school policies and broader social norms, aligning with lobbying efforts to shape legislative and policy outcomes.
- These examples indicate that Tina Descovich, through her leadership role in Moms for Liberty, participates in activities that could be classified under the state and federal definitions of lobbying, given the organization's active engagement in influencing public policy, legislative actions, and educational policies. This involvement, coupled with the organization's significant growth and impact, underscores the argument that Descovich's financially compensated actions fall within the scope of lobbying as previously defined.

Request for Action:

Given these concerns, I respectfully request that the Florida Commission on Ethics conduct a thorough investigation into Ms. Descovich's activities to determine:

- Whether her involvement with Moms for Liberty constitutes lobbying under Florida law.
- If her failure to register as a lobbyist while being compensated for activities aimed at influencing legislative action is in violation of Florida statutes.

- Whether her involvement with Moms for Liberty constitutes lobbying under Florida law.
- If her failure to register as a lobbyist while being compensated for activities aimed at influencing legislative action is in violation of Florida statutes.
- Whether her role and actions compromise her position and responsibilities as a member of the Florida Commission on Ethics, particularly in light of the prohibition against commission members engaging in lobbying.
- Whether she has voted on cases in the 4 meetings she has attended on the Commission that would have a conflict of interest as outlined in the examples above.
- Given these serious concerns, it seems prudent to discuss the necessity of Ms. Descovich disclosing donations to her organization on her Form 6 (of which there is currently none on file for her in this position) under Secondary Sources of Income. The purpose of that section is intended to require the disclosure of major customers, clients, and other sources of income to businesses in which one owns an interest. Such transparency could serve as a critical step towards mitigating potential conflicts of interest, ensuring that her role on the Ethics Commission is not compromised by her affiliations and financial ties. This discussion is paramount to maintaining the commission's integrity and the public's confidence in its impartiality.

This complaint is lodged in the interest of upholding the ethical standards and integrity expected of public officials and members of the Florida Commission on Ethics. Transparency, accountability, and adherence to the law are paramount to maintaining public trust in our governmental institutions.

Thank you for your attention to this matter. I trust that the Commission will take the appropriate steps to address these concerns and ensure compliance with Florida's ethical and legal standards. Additionally, I ask that this complaint be processed as expeditiously as possible given the nature of the complaint, and the confirmation process timeline currently in play for the respondent.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert W. Burns III". The signature is stylized with a large, looping "R" and "B", and the name "Burns III" is written in a smaller, more legible script to the right.

Robert W. Burns III