

IN THE CIRCUIT COURT FOR THE SECOND JUDICIAL CIRCUIT,
IN AND FOR LEON COUNTY, FLORIDA

OFFICE OF THE ATTORNEY GENERAL,
STATE OF FLORIDA DEPARTMENT OF
LEGAL AFFAIRS,

Plaintiff,

v.

Case No.: 2020 CA _____

FLORIDA COALITION AGAINST
DOMESTIC VIOLENCE INC.,
a Florida not-for-profit corporation,

FLORIDA COALITION AGAINST
DOMESTIC VIOLENCE
FOUNDATION INC., a Florida
not-for-profit corporation,

and

TIFFANY CARR, an individual,

Defendants.

_____/

**PLAINTIFF'S EMERGENCY MOTION TO APPOINT RECEIVER AND
FOR ENTRY OF A TEMPORARY INJUNCTION TO PRESERVE THE
ASSETS OF THE FLORIDA COALITION AGAINST DOMESTIC
VIOLENCE INC. AND THE FLORIDA COALITION AGAINST
DOMESTIC VIOLENCE FOUNDATION INC., AND
INCORPORATED MEMORANDUM OF LAW**

Pursuant to sections 617.1430 and 617.1431, Florida Statutes, Plaintiff, the
Office of the Attorney General, State of Florida Department of Legal Affairs
("Plaintiff" or "OAG"), hereby moves for the immediate appointment of a receiver

to take control and custody of Defendant the Florida Coalition Against Domestic Violence Inc. (“FCADV” or the “Coalition”), a Florida not-for-profit corporation and charitable 501(c)(3) organization, and of Defendant the Florida Coalition Against Domestic Violence Foundation Inc. (the “Foundation”), a Florida not-for-profit corporation and charitable 501(c)(3) organization created to raise funds for and to support FCADV. The OAG further seeks emergency temporary injunctive relief, pursuant to Rule 1.650(a), Florida Rules of Civil Procedure, to remove any control over the assets, operations, and records of FCADV and the Foundation by Defendant Tiffany Carr, the former president and chief executive officer of FCADV and the sole member of the Foundation, who upon information and belief continues to have check-writing authority over the accounts of those two not-for-profit corporations as well as records concerning their assets and operations.

FCADV, which was expressly entrusted under Florida law to play a vital role in protecting victims of domestic violence by passing public funding through to certified domestic violence centers, has engaged in a pattern of serious misconduct and abuse of its authority under the law. That abuse includes the diversion of significant funding to enrich its officers to a shocking degree—including \$7.5 million to its CEO, Defendant Tiffany Carr, over a three-year period; concealing its misconduct from the Florida Department of Children and Families (“DCF”); and placing Florida’s certified domestic violence centers in jeopardy of not receiving

funding critical to their mission of protecting victims.

Last week, new legislation was passed removing FCADV from its trusted position, and DCF served notice of the termination of its contract with FCADV effective in 60 days. DCF recently initiated litigation against FCADV for breach of contract and related remedies.

The immediate appointment of a receiver answerable to the Court is warranted by the exigencies of current conditions, is appropriate under settled legal principles, and is urgently required to protect the interests and safety of victims of domestic violence, who surely fall among the most vulnerable of all Floridians.

The receiver also should be empowered to take charge of the Foundation, whose only member is Defendant Carr, because it has accumulated a significant corpus of net assets—reported in its official filings to be \$1,458,489 as of June 30, 2018—from public donations to support FCADV and the Foundation, yet as of that date had failed to pass those assets through to FCADV for the benefit of Florida’s certified domestic violence centers and the victims they are dedicated to protect.

Pertinent Facts

A. The State’s Commitment to Protecting Victims of Domestic Violence.

The State of Florida is, and at all relevant times has been, committed to assist in the development of domestic violence centers throughout Florida for the benefit of victims of domestic violence, including the provision of shelters where victims

can seek protection and of various other needed services. That commitment is set forth in statute:

The Legislature recognizes that certain persons who assault, batter, or otherwise abuse their spouses and the persons subject to such domestic violence are in need of treatment and rehabilitation. It is the intent of the Legislature to assist in the development of domestic violence centers for the victims of domestic violence and to provide a place where the parties involved may be separated until they can be properly assisted.

§ 39.901, Fla. Stat. (2019).

DCF exercises its statutory oversight role in part through a contract between itself and FCADV, pursuant to which DCF controls a significant amount of state funding to be passed through by FCADV to domestic violence centers for the benefit of domestic violence victims.

To facilitate the processes for protecting victims of domestic violence, the State of Florida has, *inter alia*: tasked DCF with a wide array of duties and functions, § 39.903, Fla. Stat. (2019); provided for the certification of domestic violence centers and established standards that are to be met by the centers, § 39.905, Fla. Stat. (2019); provided for capital improvements for the centers, § 39.9055, Fla. Stat. (2019); required law enforcement officers to notify domestic violence victims of the availability of assistance from the center, § 39.906, Fla. Stat. (2019); and taken steps to protect the confidentiality of information received from victims of domestic violence, § 39.908, Fla. Stat. (2019).

In addition, funding has been made available to benefit domestic violence centers and victims through various state and federal programs administered by DCF and the Attorney General of Florida, described *infra*.

B. The Trust in and Reliance Placed upon FCADV by the State.

In furtherance of Florida’s commitment to protect domestic violence victims, the State gave FCADV a unique and special status under law, explicitly recognizing it as the “Coalition” in Chapter 39, Part XII, Florida Statutes, relating to domestic violence. *See* § 39.902(1), Fla. Stat. (2019) (defining “Coalition” to mean “the Florida Coalition Against Domestic Violence”). While much responsibility was placed upon DCF to “[o]perate the domestic violence program[.]” it was to do so “in collaboration with the coalition[.]” § 39.903(1), Fla. Stat. (2019). Among its other responsibilities, DCF was to “[c]ontract with the coalition for the delivery and management of services for the state’s domestic violence program. Services under this contract include, but are not limited to, the administration of contracts and grants.” § 39.903(7), Fla. Stat. (2019).

Although domestic violence centers are certified by DCF, § 39.905, Fla. Stat. (2019), the Legislature gave FCADV considerable authority over the centers:

As part of its delivery and management of the delivery of services for the state’s domestic violence program, the coalition shall:

- (1) Implement, administer, and evaluate all domestic violence services provided by the certified domestic violence centers.
- (2) Receive and approve or reject applications for funding of

certified domestic violence centers. When approving funding for a newly certified domestic violence center, the coalition shall make every effort to minimize any adverse economic impact on existing certified domestic violence centers or services provided within the same service area. In order to minimize duplication of services, the coalition shall make every effort to encourage subcontracting relationships with existing certified domestic violence centers within the same service area. In distributing funds allocated by the Legislature for certified domestic violence centers, the coalition shall use a formula approved by the department as specified in s. 39.905(7)(a).

(3) Evaluate certified domestic violence centers in order to determine compliance with minimum certification standards.

(4) Have the right to enter and inspect the premises of certified domestic violence centers for monitoring purposes.

§ 39.9035, Fla. Stat. (2019). In addition, certified centers have been required to divulge their employees' identities to FCADV and to have contracts with FCADV.

§ 39.903(1)(g) & (7)(b), Fla. Stat. (2019).

FCADV further was required to furnish annual reports on the status of domestic violence in Florida to the President of the Florida Senate and the Speaker of the Florida House of Representatives. § 39.904, Fla. Stat. (2019).

Thus, FCADV was entrusted by the Legislature: to oversee and evaluate the performance of Florida's domestic violence centers; to collect government funding and then pass that funding along to the centers; and to provide feedback to the Legislature on the status of domestic violence in Florida.

In performing these functions, FCADV was to be the exclusive contracting party with DCF to receive funding from the State of Florida and various federal

programs, and to pass that funding through to the 42 certified domestic violence centers located across the state. *See* §§ 39.902(1), 39.903(7), 9.035, 39.904, 39.905, Fla. Stat. (2019). By law, “[a]ll funds collected and appropriated to the domestic violence program for certified domestic violence centers” were to be “distributed annually according to an allocation formula approved by [DFC].” § 39.905(7)(a), Fla. Stat. (2019) (emphasis added).

Thus, FCADV was placed in a unique position of heightened public trust by the People of Florida. Unlike typical 501(c)(3) tax-exempt organizations, which choose their own charitable missions and rely on private donations for their funding, FCADV was a pass-through organization for distributing government funds in accordance with requirements of law made specifically applicable to it or under grants administered by state or federal agencies.

C. Articles of Incorporation and Bylaws of FCADV.

1. Articles of Incorporation.

FCADV was incorporated in 1979 under the name Refuge Information Network of Florida, Inc.; its name, set forth in Article I, was changed to the Florida Coalition Against Domestic Violence, Inc. by formal amendment in November 1988. Otherwise, the Articles, as amended from time to time, have not been changed since August 1986. **Exhibit A.**

The Articles restrict FCADV in several key respects. First, while lobbying

efforts by domestic violence centers may be “coordinated” by FCADV, Art. 2 ¶ 1, FCADV is not to engage in lobbying, Art. 11 ¶ 2., or any other activities not permitted for a 501(c)(3) organization, Art. 2 ¶ 5. Second, domestic violence centers are qualified to be voting members of FCADV, Art. 4 ¶ 1. Third, no part of FCADV’s net earnings is to inure to the benefit of any member, officer, or director, Art. 11 ¶ 1, and FCADV is forbidden to engage in any act of self-dealing, *id.* at ¶ 3. Fourth, FCADV is to make distributions of its income remaining at the close of each fiscal year in order to avoid becoming subject to taxes on undistributed income, *id.* at ¶ 4.

2. Bylaws.

Like the Articles of Incorporation, the current Bylaws of FCADV, **Exhibit B**, provide that “no part of the net earnings of FCADV shall inure to the benefit of, or be distributed to the directors or officers of the Corporation,” except for limited circumstances allowing for compensation to a Board member, Bylaws Art. IV § 1; lobbying is forbidden unless an election has been made under section 501(h) of the Internal Revenue Code, and FCADV is not to participate in any political campaign, Bylaws Art. IV § 5; and FCADV is not to engage in any activities prohibited by section 501(c)(3) of the Internal Revenue Code, Bylaws Art. IV § 6.

The Bylaws further provide that all certified domestic violence centers are eligible to be members, Bylaws Art. V § 2. All members are required to pay dues

to FCADV, *id.* at § 5, but only members who are current in their dues payments are eligible to vote at membership meetings, *id.* at § 1. Membership meetings are to be held annually, unless otherwise specified by the Board of Directors, *id.* at § 9.

The Bylaws state that the Board of Directors “shall be responsible for the development, management and control of the affairs, property and funds” of FCADV. Bylaws Art. VII § 1. Directors are required to disclose in writing “the potential of any conflict of interest.” *Id.*

The section of the Bylaws dealing with officers provides that the “President/CEO may not serve as an officer.” Bylaws Art. VIII § 1. The officers are supposed to include a chairperson, first vice president, and second vice president, in addition to the secretary and treasurer. *Id.* The chairperson is to be FCADV’s “official representative” and to “preside at all meetings of the Board of Directors and membership...” Bylaws Art. VIII § 7.A.

The President/CEO (“CEO”) position is covered in Article X of the Bylaws. The CEO reports to the Chairperson of the Board of Directors and is subject to the terms of an employment contract with FCADV. Bylaws Art. X § 1. In addition, the CEO is

responsible to the Board of Directors for the overall administration and operation of the Corporation. The President/CEO shall be responsible for implementing the Corporation’s policies as promulgated by the Board of Directors, directing and controlling the operation of all of the Corporation’s programs, supervising the employees of the Corporation and generally managing the day-to-day affairs of the Corporation in

accordance with the job description approved by the Board of Directors. The President/CEO shall also be responsible for reporting to the Board any and all information of which the Board should have knowledge in order to carry out its responsibilities as enumerated in these Bylaws.

Bylaws Art. X § 2. The CEO also is a voting member of the Board of Directors.

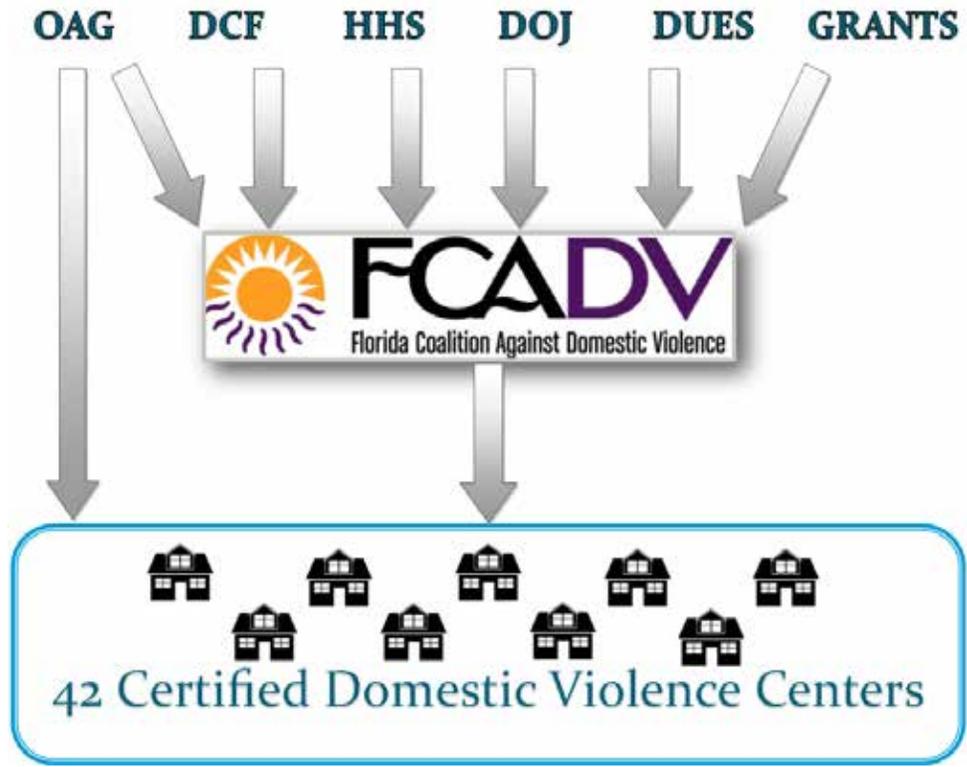
Id. at § 3.

In Article XI, the Bylaws set forth a strong position against “even the appearance of a conflict of interest in all transactions. Bylaws Art. XI § 1. Any conflict or potential conflict “which compromises or could compromise the objectivity and effectiveness of such person which is clearly detrimental to the best interest” of FCADV must be reported immediately to the Chairperson of FCADV. Such reporting is required of the CEO. *Id.* at § 2.

FCADV is required to keep, at its principal office in Tallahassee, “correct and complete books and records of accounts, minutes of meetings, and an updated list of the names and addresses of all members, including their committee assignments, and the members of the Board of Directors.” Bylaws Art. XII § 1. The CEO “is the custodian of the books and records.” *Id.*

D. FCADV’s Funding in Support of Domestic Violence Centers.

FCADV’s primary role has been to receive state and federal funds it receives and to transfer those funds to the 42 certified domestic violence centers located across the state.



While FCADV receives a modest amount of income from other sources, nearly all of its revenues come from government funding. According to FCADV’s Form 990 return filed with the IRS for the fiscal year ending June 30, 2018 (“FY17-18”), attached as **Exhibit C**, FCADV’s total revenue was \$52,010,131 (Part I, line 12). Of that sum, “government grants (contributions)” were \$51,443,542 (Part VIII, line 1e). Thus, 98.64 percent of FCADV’s revenues came from government grants.¹ DCF directly provided approximately 80 percent of FCADV’s funding for

¹ The remaining revenues, by subtraction totaling \$566,589, came from membership dues of \$334,139 (Part VIII, line 1b), “all other contributions, gifts, grants, and similar amounts not included above” in the amount of \$98,731 (*id.*, line 1f), “program service revenue” of \$23,570 (*id.*, line 2g), investment income of \$88,909 (Part I, line 10), and “other revenue” of \$21,240 (*id.*, line 11).

that year, and the Office of the Attorney General of Florida approximately 15 percent, with the sources of that funding coming from legislative appropriations and federal grants under the Victims of Crime Act (“VOCA”) program.

Figures from FCADV’s Form 990 returns for the fiscal years ending in mid-2017 (“FY16-17”), **Exhibit D**, mid-2016 (“FY15-16”), **Exhibit E**, and mid-2015 (“FY14-15”), **Exhibit F**, are comparable. In FY16-17, FCADV’s total revenue was \$42,751,725 (Part I, line 12). Of that sum, “government grants (contributions)” were \$42,301,038 (Part VIII, line 1e). Thus, 98.94 percent of FCADV’s revenues in FY17 came from government grants. In FY15-16, FCADV’s total revenue was \$40,119,474 (Part I, line 12). Of that sum, “government grants (contributions)” were \$39,728,061 (Part VIII, line 1e). Thus, 99.02 percent of FCADV’s revenues in FY16 came from government grants. In FY14-15, FCADV’s total revenue was \$39,161,211 (Part I, line 12). Of that sum, “government grants (contributions)” were \$38,466,294 (Part VIII, line 1e). Thus, 98.23 percent of FCADV’s revenues in FY15 came from government grants.²

² FCADV also has a separately incorporated foundation, the Florida Coalition Against Domestic Violence Foundation, Inc., discussed *infra*. The Foundation’s reported total revenue for FY17-18 was \$147,349, down from \$290,097 in FY16-17 (Part I, line 12). “Salaries, other compensation, employee benefits” were shown to be \$32,343, also down from \$32,652 in FY16-17 (Part I, line 15). It appears that, while the Foundation showed net revenue (after expenses) of \$91,575 in FY17-18 and \$207,807 in FY16-17, and net assets of \$1,458,489 in FY17-18 and \$1,366,914

E. Media Coverage Exposes Improprieties by FCADV.

With the help of information obtained from persons with knowledge of what was transpiring inside FCADV, news reporters in 2018 unleashed a veritable bombshell: *viz.*, that FCADV’s officers—most strikingly its CEO—were being compensated on a shocking scale. Indeed, it was reported that CEO Tiffany Carr had received total compensation of \$7.5 million over a three-year period. Attached as **Exhibit G** is a compilation of articles appearing in major newspapers in Florida, underscoring the strong public interest in rectifying what has come to be regarded as scandalous greed.

F. FCADV’s Efforts to Conceal Evidence from DCF.

As noted above, DCF recently brought legal action against FCADV, Ms. Carr, and FCADV’s officers and directors to seek redress for their misconduct. *Fla. Dep’t of Children and Families v. Fla. Coalition Against Domestic Violence Inc., et al.*, Case No. 2020 CA 431 (Fla. 2d Cir. Ct.). In its Complaint (“DCF Cmplt.”), attached as **Exhibit H**, DCF alleges its efforts, beginning in August 2018, to investigate FCADV’s administrative costs and executive compensation as well as FCADV’s efforts to stonewall that investigation. *See* DCF Cmplt. ¶ 24.

DFC further alleges that, in September 2018, FCADV disclosed a small

in FY16-17, no grants or distributions were made to FCADV—or any other charitable beneficiary—in either year.

portion of the requested documents for fiscal years 2016-2017 and 2017-2018, but refused to produce most records, claiming that it was under no obligation to turn over documents pertaining to its activities funded by private sources, notwithstanding the reality that it is almost 100 percent funded by public dollars, as shown above. In particular, FCADV, through its outside counsel, asserted that executive compensation was not pertinent to FCADV's contract with DCF. *Id.* at ¶¶ 25-30.

More than a year later, in an attempt to dissuade DCF from further investigation, FCADV claimed, in bold typeface: “**No bonuses have ever been paid out of any state or federal funds.**” Notably, FCADV failed to disclose any of the exorbitant PTO cash payouts, discussed below, which were cleverly disguised on FCADV's balance sheets as “accounts payable and accrued expenses” rather than bonuses or deferred compensation, the logical places to report them. *Id.* at ¶ 31.

The campaign of obstruction has continued into 2020. On January 7, 2020, DCF met with FCADV's then-interim President and CEO, Denise Grimsley, its CFO, Patricia Duarte, and its COO, Sandra Barnett. DCF was provided false and incomplete documents, data, information, and spreadsheets that obscured the true amounts of executive compensation received by Defendant Carr, Ms. Duarte, and Ms. Barnett. *Id.* at ¶¶ 32-33.

After further investigation, DCF's Office of the Inspector General determined that Ms. Carr had received millions of dollars over the course of a few years in salary, bonuses, and paid time off ("PTO"), with the bulk being awarded through annual cash payouts of PTO. *Id.* at ¶ 34.

DCF contends that Ms. Carr, Ms. Barnett, and Ms. Duarte engaged in a scheme and conspiracy to provide false and misleading information and documents to DCF and its OIG regarding Ms. Carr's total compensation and FCADV's misuse of public funds. DCF further alleges, upon information and belief, that Ms. Barnett and Ms. Duarte had a personal financial interest in the scheme and conspiracy, as they received a number of personal benefits, including substantially increased compensation and enhanced PTO allowances. *Id.* at ¶¶ 35-37.

The allegations made by DCF underscore the perfidy of FCADV and its officers, which was graphically revealed last week through sworn testimony and internal documents obtained, after much prolonged effort, from FCADV.

G. The Diversion of Funds from DCF and Members to Pay Unconscionably Excessive Compensation to FCADV's Officers.

1. Compensation Amounts Shown in FCADV's Form 990 Returns.

The 990 returns for FCADV for fiscal years 2014-2015 through and including 2017-2018, **Exhibits C-F**, in Schedule J Part II, purport to show total compensation—including salary, bonus, retirement and deferred compensation (plus

other areas of compensation)—for FCADV’s officers over that four-year period, in dollars, as follows:

		FY14-15	FY15-16	FY16-17	FY17-18³
Tiffany Carr, CEO	Base comp.:	430,585	611,536	743,560	575,633
	Bonus:	0	0	0	0
	Other:	17,500	18,000	18,000	18,000
	Ret/deferred:	15,858	15,546	15,554	17,104
	Nontax ben.:	23,084	24,295	24,496	25,760
	Total:	487,027	669,377	801,610	636,497

Patricia Duarte, CFO	Base comp.:	156,507	176,301	210,626	292,932
	Bonus:	0	0	0	0
	Other:	17,500	18,000	18,000	18,000
	Ret/deferred:	7,210	7,707	8,250	9,068
	Nontax ben.:	3,470	3,708	3,438	3,863
	Total:	184,687	205,716	240,314	323,863

Sandra Barnett, COO	Base comp.:	176,513	209,104	192,516	204,748
	Bonus:	0	0	0	0
	Other:	17,500	18,000	18,000	18,000
	Ret/deferred:	8,463	9,002	9,365	9,961
	Nontax ben.:	14,372	15,547	15,504	10,151
	Total:	216,848	251,653	235,385	242,860

These dollar figures set forth what FCADV represented to the world at large—including state and federal governmental entities, regulators, the domestic violence centers, domestic violence victims, and donors to FCADV and the Foundation—how much FCADV was spending to compensate its officers.

³ The Foundation, in its form 990 return for FY17-18, **Exhibit I**, at Part II, Schedule J lists Tiffany Carr as its sole member, but pays her no salary or other compensation (*see also* Part I, line 14, indicating no benefits paid to members).

However, internal memoranda obtained from FCADV, and sworn testimony obtained last week from FCADV's current and former Board Chairs, its CFO, and its COO by the House of Representatives Committee on Public Integrity and Ethics, discussed *infra*, tell a dramatically different story when it comes to their actual compensation.

2. The Misuse of "Paid Time Off" to Minimize the Appearance of Compensation Paid to FCADV's CEO.

Much if not most of the undisclosed compensation to CEO Carr has come by way of excessive PTO. FCADV's Employment Procedures Manual describes PTO as "an all-purpose time-off benefit for Regular full-time employees to use for vacation, illness or injury, and personal business. It combines traditional vacation and sick leave plans into one flexible, paid time-off benefit and must be earned and used as described in this policy at the rates outlined below." **Exhibit J** at 1.

The amount of PTO for which an employee is eligible varies with years of service, from a low of 31 days (after 5 years) to a high of 50 days (after 20 years). PTO is "paid at the employee's base pay rate at the time of absence." *Id.* at 3. Unused PTO can be carried over to the next fiscal year. Employees may "sell back" up to 90 hours of PTO once per year. *Id.* Upon termination of employment, employees "will be eligible to be paid a portion of the unused PTO" but "at the discretion of the President/CEO based on the following scale." *Id.* The scale allows, after 10 years, for a payout for 320 hours of PTO, with the president/CEO

having discretion to “reset the payout schedule based upon special circumstances.”
Id.

Thus, the concept of PTO was that it would provide a benefit to employees, rolling vacation and sick leave together, and allowing for modest carrying over of unused balances and ultimate cashing in within reasonable prescribed limits. PTO was not intended to be used as a major component of compensation.

These limitations were tossed aside for CEO Carr. Whereas PTO allowances to Ms. Carr early on were expressed in reasonable increments of hours, *e.g.*, 240 hours per year in 2010, or a lump sum payout of 2,080 hours upon expiration of the contract in 2015 if it was not renewed. **Exhibit K.**

By May of 2016, Ms. Carr’s awards increased so substantially that they were expressed in **days** of PTO rather than hours, which she was expressly authorized to cash in at any time or to carry forward indefinitely as a matter of her sole discretion. In May 2016, in addition to a salary of \$300,000 and other benefits, Ms. Carr received 360 days—a full year—of PTO. **Exhibit L.** In addition to the massive increases in new PTO being awarded to her, the awards were cumulative, with each new allotment being added to the running balance.

In May 2017, Ms. Carr’s salary was boosted to \$350,000, she was given a \$100,000 bonus (split between fiscal years), a second bonus of \$100,000 additional deferred compensation, and 465 days—well over a year—of PTO. **Exhibit M.**

In May 2018, the Board and Ms. Carr negotiated an increased base salary to \$450,000, a cash bonus of \$135,000, and a total of 684 hours of PTO. **Exhibit N.** As of June 30, 2018, according to FCADV records, she had accrued approximately \$2,605,932.16 in PTO. **Exhibit O.** A year later, in June 2019, the Board increased her base salary to \$495,000, awarded her a cash bonus of \$200,000, and gave her another 360 days of PTO. **Exhibit P.**

On October 25, 2019, the Board addressed CEO Carr's imminent planned retirement. The Board voted to award her two years of severance pay, presumably at the \$495,000 base salary; compensation for two years of health, life, and disability insurance; financial assistance with any tax liability; and liquidation of all pending PTO. **Exhibit Q.**

FCADV's CFO, Patricia Duarte, testified before the House Committee on Public Integrity and Ethics on February 27, 2020, that CEO Carr in 2018 cashed in PTO of \$1.28 million in August and \$1.8 million in December. **Exhibit R** at 370. While the PTO payouts were initially charged to the "private" category in FCADV's accounts pursuant to CEO Carr's directive, private donors were not to be notified of this apparent use of their gifts because the payouts would later be charged to different, non-private accounts, *id.* at 374-75—*viz.*, DCF accounts, *id.* at 424-26. The accounting shell game underscored that the PTO payouts came from public funds. According to the CFO, accrued PTO was not reported in FCADV's Form

990 returns in connection with officer compensation. The liability incurred by FCADV for PTOs was shown in Part X of the returns, the balance sheet, on p. 11, line 17, for “accounts payable and accrued expenses.” *Id.* at 377-79. The decision to label the payouts PTO instead of bonuses was made by CEO Carr. *Id.* at 382-83.

The excessive sums received by CEO Carr in 2019 had extremely adverse consequences to FCADV. The CFO testified that FCADV had to pay the IRS \$405,036.84 on November 12, 2019, arising from Ms. Carr’s severance package, and another \$510,000 on November 14, 2019, as an excise tax triggered by the size of her compensation. *Id.* at 440-41.

Documentation originating from FCADV obtained by the House Committee on Public Integrity and Ethics shows full compensation to Ms. Carr over a period of approximately three years totaling more than \$7.5 million.⁴

While the CFO and COO were not accorded such astronomical largesse, they also received substantial levels of compensation, raises, and PTO. The CFO

⁴ Summary records obtained by the House from DCADV for fiscal years 2016-2017 through and including 2018-2019 show compensation to Ms. Carr—including “PTO liquidated” but excluding sums for “457b,” “insurance,” and “401k match”—totaling \$5,546,783.23. Compensation for July through October 2019, excluding the same categories, totaled \$1,968,001.25. Added together, the total sum is \$7,514,748.48. Of that, PTO payouts totaled \$3,707,866.21. (Inclusion of the excluded sums brings the total to \$7,762,573.27.) **Exhibit S.**

testified that Ms. Carr was empowered to give raises and bonuses as she saw fit, and to ignore policy in the amounts of PTO she awarded to the other officers. Ms. Duarte's salary went from \$42,000 in 2005 to \$220,000 in 2018, and in 2018 she was awarded 165 days in PTO. **Exhibit R** at 410-11.

3. The Use of a Forged Document to Support the Excessive Compensation Paid to Defendant Carr.

As early as October 5, 2009, the Coalition established the Board of Directors Policies which also applied to the CEO, entitled "Compensation and Benefits." **Exhibit T.** In summary, the Policy stated that the Board of Directors Compensation Committee would conduct market analysis for the CEO position to determine the salary and benefits package. The market analysis would be maintained in the CEO personnel file. The Policy also directed that the CEO was prohibited from changing the compensation and benefits package offered by the Board of Director Compensation Committee. As noted below, CEO Tiffany Carr violated this Policy.

In 2018, in response to the critical media coverage, FCADV sought to justify CEO Carr's lavish compensation by claiming that it was reasonable based upon comparisons with executive compensation at comparable not-for-profit corporations. A document may have been forged, backdated, and slipped into FCADV's files to support this position. An earlier "Executive Committee Memorandum" setting forth CEO Carr's compensation, signed by Board Chair Melody Keeth and dated May 10, 2016, **Exhibit L**, was copied and converted into a

second document of the very same date, **Exhibit U**, also signed by Ms. Keeth. While the initial paragraphs of the two documents are identical, the second version contained a market analysis comparison relating to Ms. Carr's compensation package. The fictitious nature of the document is apparent from (1) a comparison of the handwritten signatures and dates, which are absolutely identical, from a telltale vertical line along the side (suggestive of use of a photocopier); and (2) the comparability data displayed, which were drawn from Form 990 returns that were not available in 2016. The objective was twofold: (1) to create the false impression that the proper market comparison analysis had been timely conducted; and (2) to justify awarding Defendant Carr such exorbitant compensation. Even apart from the dishonesty of its fabrication, the document's comparability analysis was deeply flawed, because it did not look to other not-for-profit organizations that functioned primarily as pass-throughs for government funds, rendering comparisons of CEO compensation unjustifiable.

Melody Keeth, the current Chair of FCADV's Board, testified that she had no recollection that FACDV had ever compared CEO Carr's salary with other CEOs of other coalitions in the country. **Exhibit V** (Keeth Depo.) at 70. The CFO, Patricia Duarte, testified that no memoranda discussing any analysis of comparable CEO compensation were received by her until 2018, the year when the issue of Ms. Carr's excessive compensation surfaced in the press. **Exhibit R** at 445.

4. CEO Carr's Refusal to Return Excess Funds to DCF

Sandra Barnett, FCADV's COO, testified that she has been FCADV's primary contact with DCF. Under FCADV's contract with DCF, FCADV was required at the close of each fiscal year to return unspent state funds to DCF. *See Exhibit W*, section 3.5, p. 3. Ms. Barnett's testimony confirmed her understanding of that obligation, acknowledging: "[W]e must return money that is unearned." *Exhibit R* at 464.

However, CFO Duarte testified that Ms. Carr instructed her not to return funds to DCF. *Id.* at 425-26. Ms. Carr directed that DCF funds be used to pay hundreds of thousands of dollars in PTO to the CEO. *Id.* at 424-26. This is consistent with the pattern of giving generous bonuses and PTO allotments near the end of fiscal years, in order to wipe out any remaining excess funds rather than return them to DCF, as the contract required.

CFO Duarte further admitted in her testimony that the huge sums paid out to Ms. Carr, including a payment for \$1,277,163.01, could have serviced a significant number of domestic violence clients had it not been diverted to Ms. Carr. *Id.* at 427-28.

5. The Lack of Oversight by FCADV's Board of Directors

Several Board members testified in depositions taken by the House Committee on Public Integrity and Ethics that no training was provided to Board

members of FCADV. **Exhibit X** (Lynch Depo.) at 12; **Exhibit V** (Keeth Depo.) at 11-12; **Exhibit Y** (Diaz-Vidaillet Depo.) 9-10.

It therefore comes as no surprise that the Board members did not appreciate that they had fiduciary duties to oversee the officers to ensure their proper conduct and their observance of legal and contractual requirements that bound FCADV. Director Lynch was not even aware that most of FCADV's funding was from government sources. She simply accepted CEO Carr's assurances that there was plenty of funding available for her compensation. **Exhibit X** (Lynch Depo.) at 19-21.

Director Keeth, in her testimony before the House Committee, said that she thought that Ms. Carr would use the PTO she had received as sick leave, and that the Board had never intended that she cash it all out. **Exhibit V** (Keeth Depo.) at 35. "Never in my wildest imagination would I think that she would do that. It never even occurred to me, not once." *Id.* at 36. Ms. Keeth did not know if state funds were used to pay out Ms. Carr's PTO. *Id.* at 52. She did not even know how much private money FCADV had. *Id.* at 53.

Director Lynch was likewise unaware that most of FCADV's funding has been from government, not from private sources. She, too, was assured by Ms. Carr that there was plenty of funding for Carr's compensation. **Exhibit X** (Lynch Depo.) at 19-21, 31. In the end, Ms. Lynch was shocked by the size of payments to Ms.

Carr, stating that in her view she had been misled by the CEO. *Id.* at 49-50.

Director Diaz-Vidaillet testified that she had a conversation with Ms. Carr about the huge sums she was taking. Ms. Diaz-Vidaillet said to her: “You have got to be crazy.” Ms. Carr replied that no one would have found out about it for another two years. **Exhibit Y** (Diaz-Vidaillet Depo.) at 6. The obvious import is that but for the media attention, the excessive sums would not have come to light until the applicable Form 990 became public at a later time.

It is clear, both from the numerous affidavits provided by the executives in charge of the certified domestic violence centers attached as exhibits to this motion, and from the recent letter to the Governor signed by 26 of the 42 center executives demanding the ouster of the Board members, that the Board has not served the interests of the centers, which are members of FCADV. **Compilation Exhibit Z & Z-1.**

H. Significant Resignations Leave FCADV Without Leadership.

In the wake of the resignations of Defendant Tiffany Carr as CEO and Denise Grimsley as Interim CEO, FCADV is currently without a chief executive officer. That role has been assumed, without proper authorization, by the Board Chair, Melody Keeth. **Exhibit V** (Keeth Depo.) at 10-11.

I. The Legislature Removes FCADV's Statutory Monopoly Position.

Last week, new legislation was passed by the Florida Legislature and signed into law by the Governor that removed all references to FCADV from the Florida Statutes. Ch. 2026-6, Laws of Fla. DCF is now empowered to take over the position and responsibilities of FCADV, or to fashion some alternative approach involving a contract or multiple contracts with potential pass-through organizations deemed suitable for the role.

Regardless, going forward there will be no statutory monopoly of the sort that FCADV abused.

J. DCF Notices the Termination of Its Relationship with FCADV.

In light of the new legislation, DCF has acted with dispatch to give notice of the cancellation of its contractual relationship with FCADV, effective in 60 days.

Exhibit AA.

K. Imminent Need for Appointment of a Receiver to Control FCADV.

As shown above, FCADV is acting without proper leadership as the clock ticks away the 60 days remaining until its role as Florida's pass-through agency for funding the 42 certified domestic violence centers is terminated.

The attached affidavits from many of the dedicated executive directors or chief executive officers of the Centers, **Compilation Exhibit Z**, amply demonstrate their growing alarm that their funding streams may be cut off, leaving them in peril

of having to close down their operations, lay off staff, and leave their communities without the important, if not vital, benefit of their services on behalf of victims of domestic abuse.

The need for a swift judicial remedy is clear. The OAG respectfully urges that appointment of a receiver to take full control of FCADV and its operations and assets is the best solution, regardless of whether FCADV is to be wound down and liquidated, or instead is to be reorganized and resuscitated (both remedies are alternatively sought in the Complaint).

L. Imminent Need for Appointment of a Receiver to Control the Foundation.

FCADV also has a separately incorporated foundation, the Florida Coalition Against Domestic Violence Foundation, Inc., discussed *supra*. The Foundation's articles of incorporation provide, in pertinent part:

The Corporation is organized exclusively for charitable purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code of 1986, as amended (the "Code"), to support Florida Coalition Against Domestic Violence, Inc., a Florida not-for-profit corporation and an organization exempt from federal income tax under Section 501(c)(3) of the Code, by accepting contributions for and making distributions to the Florida Coalition Against Domestic Violence, Inc.

Articles of Incorporation of Florida Coalition Against Domestic Violence Foundation, Inc., Art. II ¶ (a). **Exhibit BB.**

The Foundation files separate annual Form 990 returns with the Internal Revenue Service. In Part I, line 1 of Foundation's Form 990 return for FY17-18, it

states: “THE FLORIDA COALITION AGAINST DOMESTIC VIOLENCE FOUNDATION’S MISSION IS TO BROADEN AND DEEPEN RESOURCES TO THE FCADV TO ENSURE THE LONG TERM SUSTAINABILITY OF LIFE SAVING SERVICES FOR VICTIMS OF DOMESTIC VIOLENCE AND THEIR CHILDREN.” (Solid capitals in original.) **Exhibit I.**

The Foundation, in its form 990 return for FY17-18 (*id.*, Part II, Schedule J), lists Tiffany Carr as its sole member, but pays her no salary or other compensation (*see also* Part I, line 14, indicating no benefits paid to members).

The Foundation’s reported total revenue for FY17-18 was \$147,349, down from \$290,097 in FY16-17 (*id.*, Part I, line 12). “Salaries, other compensation, employee benefits” were shown to be \$32,343 in FY17-18, also down from \$32,652 in FY16-17 (*id.*, Part I, line 15). It appears that, while the Foundation showed net revenue (after expenses) of \$91,575 in FY17-18 and \$207,807 in FY16-17, and net assets of \$1,458,489 in FY17-18 and \$1,366,914 in FY16-17, no grants or distributions were made to FCADV—or any other charitable beneficiary—in either fiscal year.

The sizable amount of net assets under management of the Foundation underscores the need for judicial intervention by way of the appointment of a receiver. Above all else, those assets must be protected, and there is simply no rational basis, in light of Ms. Carr’s track record, for the Court to repose any

confidence in her judgment or integrity when it comes to running the Foundation.

Going forward, even if some new life can be breathed into FCADV, it is highly unlikely that it will again act as a pass-through organization entrusted with significant government funds on behalf of the certified domestic violence centers of Florida. Yet this is plainly the function that motivated private donors to make gifts to the Foundation. The funds of the Foundation could serve as a vital resource to FCADV to ensure that funding continues to the domestic abuse centers, as the donors intended, during the receivership.

Argument

The Court has jurisdiction over the matter in controversy pursuant to its powers in equity and at common law, and pursuant to sections 26.012, 617.1430, 617.1431, and 617.2003, Florida Statutes.

Venue is proper pursuant to sections 47.011, 47.051, and 617.1431, Florida Statutes, because FCADV is located and has its principal place of business in Leon County, Florida.

As the State's chief legal officer and head of the Department of Legal Affairs, the Attorney General is authorized, *inter alia*, to bring actions against not-for-profit corporations, including an action for judicial dissolution of a not-for-profit corporation, § 617.1430, Fla. Stat., to prevent the improper use of a corporate charter, § 617.2003, Fla. Stat., and to enjoin the transaction of unauthorized business,

§ 617.0304(c), Fla Stat. Judicial dissolution of a not-for-profit corporation is appropriate where the corporation “has continued to exceed or abuse the authority conferred on it by law.” § 617.0304(1)(a)2., Fla Stat. The Attorney General further is authorized, in bringing an action for dissolution of a not-for-profit corporation pursuant to section 617.1430, Florida Statutes, to request that the court issue injunctions, appoint a receiver or custodian pendente lite with all the powers and duties the court directs, take other action required to preserve the corporation’s assets wherever located, and carry on the affairs of the corporation until a full hearing is held. § 617.1431(3), Fla. Stat.

I. A RECEIVER SHOULD BE APPOINTED IMMEDIATELY.

As shown above, the People of Florida placed FCADV in a position of heightened public trust, a position far removed from a typical 501(c)(3) tax-exempt organization that chooses its own charitable mission and relies entirely on private donations for its funding.

Rather than honor that trust, FCADV’s officers, in collaboration with its directors, have engaged in a scheme to enrich themselves personally to a shocking extent. Through the bestowing of excessive salaries and bonuses, and the awarding PTO days in staggering numbers as a means to supplement salaries, Defendant Carr raked in some \$7.5 million dollars in compensation over a three-year period, during which she rewarded her loyal subordinate chief financial and chief operating officers

with excessively generous total compensation packages. The CFO of FCADV has admitted under oath that these compensation packages were paid from public funds entrusted to FCADV, and that the sums were awarded in large part to use up leftover funds at the end of fiscal years rather than return those funds to DCF as required under FCADV's contract with DCF. As numerous affidavits from the executives operating the certified domestic violence centers attest, the excessive sums diverted to officer compensation could and should have been distributed to the centers for the benefit of victims of domestic violence.

In the wake of investigations and these developments, FCADV's president and chief executive officer, Defendant Tiffany Carr, has resigned, an Interim CEO, Denise Grimsley, appointed to replace Ms. Carr has resigned, and the chair of the Board of Directors, also implicated in these matters, has undertaken to run FCADV in the breach. There is a serious vacuum of leadership at FCADV.

In the meantime, the executives operating the certified domestic violence centers have become increasingly concerned over the threat of a disruption of continuity in the provision of funding needed to operate their organizations on behalf of domestic violence victims. Twenty-six of these executives recently joined together in a letter to the Governor complaining of mismanagement of FCADV and calling for the ouster of its Board of Directors.

As more and more evidence of FCADV's misconduct came to light, the Florida Legislature recognized the urgent need for action and just last week passed legislation, signed into law by Governor DeSantis, removing FCADV from its monopoly position and deleting all references to FCADV in the Florida Statutes. The legislation enables DCF to go forward without any intermediary organization such as FCADV, or in its discretion to arrange for another such organization to be selected to perform that function pursuant to contract.

The day after the new legislation passed, DCF served a notice of termination upon FCADV, announcing that its contractual arrangement with FCADV will terminate in 60 days. The lack of this critical funding could very well render FCADV insolvent. It is reasonable to infer that, even if DCF opts to utilize an outside entity again, FCADV is unlikely to be the chosen entity—particular if the process by which DCF seeks a new contract partner requires an extended time period to implement. It is further unlikely that FCADV's personnel would opt to remain in its employ for that duration under such uncertain circumstances, even if resources were available to allow for it.

These developments underscore the need for the immediate appointment of a receiver to take control of FCADV. A receiver, answerable to the Court, is necessary to ensure that FCADV operates in a transparent manner during the dissolution process, that funds received by FCADV continue to be distributed fairly,

promptly, and in accordance with all legal requirements for the benefit of the centers, and to wind down the organization in preparation for its liquidation—or, should the Court instead require, its reorganization. Further, a receiver is necessary to ensure full cooperation with the investigations by governmental authorities into the conduct of the former management.

Likewise, the need exists for the receiver to take control over the Foundation, which exists solely to serve the interests of FCADV. As noted *supra*, the Foundation’s only member is Defendant Tiffany Carr, and it holds assets of approximately \$1.5 million, obtained from donors who wished to support FCADV in its mission.

A. The Court’s Authority to Appoint a Receiver.

“The power to appoint a receiver has long been recognized as one that is inherent in a court of equity, which ‘lies in the sound discretion of the chancellor to be granted or withheld according to the facts and circumstances of the particular case.’” *Granada Lakes Villas Condo. Ass’n, Inc. v. Metro-Dade Invs. Co.*, 125 So. 3d 756, 758 (Fla. 2013) (citations omitted). *See also: Armour Fertilizer Works v. First Nat’l Bank of Brooksville*, 100 So. 362 (Fla. 1924); *Bayview Homes Co. v. Sanders*, 136 So. 234 (Fla. 1931); *Buckley Towers Condo., Inc. v. Buchwald*, 340 So. 2d 1206, 1209 (Fla. 3d DCA 1976), *cert. denied*, 348 So. 2d 945 (Fla. 1977); *Recarey v. Rader*, 320 So. 2d 28 (Fla. 3d DCA 1975); *Ins. Mgmt., Inc. v. McLeod*,

194 So. 2d 16 (Fla. 3d DCA 1966); *Bookout v. First Nat'l Mortg. & Disc., Co., Inc.*, 514 F.2d 757 (Fla. 5th Cir. 1975); Rule 1.620, Florida Rules of Civil Procedure, Authors' Comment – 1967 (2017) (“The matter of appointing a receiver rests within the discretion of the court.”).

A court-appointed receiver is the agent of the Court, and property or monies possessed by a receiver are possessed by the Court. *Edenfield v. Crisp*, 186 So. 2d 545, 549 (Fla. 2d DCA 1966).

In *Granada Lakes*, the Florida Supreme Court set forth circumstances warranting appointment of an equitable receiver: “Equitable receiverships are a creation of common law, which this Court has stated should be reserved for cases involving fraud, self-dealing, or waste.” *Id.*, 125 So. 3d at 759. *See also McAllister Hotel v. Schatzberg*, 40 So. 2d 201, 202–03 (Fla.1949) (same); *Apalachicola N.R. Co. v. Sommers*, 85 So. 361, 362 (Fla. 1920) (appointment of receiver proper to prevent fraud, destruction, loss of property, or self-dealing).

In addition, misconduct, mismanagement, and danger of or actual insolvency of a corporation authorize appointment of a receiver. *See Bird Rd. Commercial Sites, Inc. v. Feldstein*, 214 So. 2d 658, 660 (Fla. 3d DCA 1968), *cert. denied*, 222 So. 2d 752 (Fla. 1969) (affirming appointment of receiver where chancellor faced a “maze of conflicting financial reports and interpretations thereof”).

The Court has inherent authority to appoint a receiver of all the property, business, and affairs of a corporation to carry on its business. *Mills Dev. Corp. v. Shipp & Head*, 171 So. 533, 534 (Fla. 1936). Appointment of a receiver is appropriate, *inter alia*, where the assets of a not-for-profit corporation “are being misapplied or wasted.” § 617.1430(2)(c), Fla. Stat.

B. The Nature of the Requested Receivership.

The OAG seeks appointment of a receiver to take control and custody and to manage all the property, the business, and the affairs of FCADV and the Foundation. The facts discussed above, and the exhibits attached hereto, underscore the need for such an appointment.

Viewed as a whole, the evidence strongly indicates that FCADV has suffered, *inter alia*, from gross mismanagement, breach of fiduciary duties by its Board of Directors, diversion of resources from its critical mission for the inurement of its officers, breach of its contract with DCF, and other significant improprieties, all of which are inconsistent with its Articles of Incorporation and its Bylaws.⁵

Because the Foundation’s purpose is wholly derivative of and consistent with FCADV’s purpose, the misconduct of its member, Tiffany Carr—the driving force

⁵ “The corporation and its directors and officers are bound by and must comply with the charter and bylaws.” *Yarnall Warehouse & Transfer v. Three Ivory Bro. Moving Co.*, 226 So. 2d 887, 890 (Fla. 2d DCA 1969).

behind the circumstances giving rise to the need for relief for FCADV—has severely prejudiced the Foundation. As a consequence, Ms. Carr’s position of control over the Foundation and its assets should be terminated in favor of a receivership.

Specifically, the Court should appoint a receiver to:

- Manage FCADV prudently and in accordance with its Charter, bylaws, and applicable law;
- Take control, custody, and management of all monies, accounts, property, and assets of FCADV and the Foundation;
- Identify and report to the Court all actions and omissions of the Directors and the officers operating FCADV and the Foundation that have materially affected their operations;
- Bring up-to-date, and to the extent possible reconcile, the books and accounting of FCADV and the Foundation, verify their actual fiscal status, make proper arrangements for handling all their accounts payable and receivable, and where necessary or appropriate amend any tax returns of or other government filings by them;
- Consider and report to the Court whether it will be necessary to hire, retain, contract with, or install a new Board, officers, bookkeeper, or accountant for FCADV and the Foundation;
- Consider whether FCADV and the Foundation should be dissolved and, if so, report the basis for such a conclusion to the Court; and
- Otherwise comply with the requirements of Rule 1.620(b), Florida Rules of Civil Procedure.⁶

⁶ For a comparable example of tasks assigned to a court-appointed receiver, *see* Order Appointing Receiver, *OAG v. Vitale*, Case No. 13-19356 (12) (Fla. Cir. Ct. Broward Cty. Apr. 24, 2014) (attached as **Exhibit CC**).

II. A TEMPORARY INJUNCTION SHOULD ISSUE TO PRESERVE THE ASSETS OF FCADV AND THE FOUNDATION.

A temporary injunction is appropriate where its entry is shown to satisfy “a four-part test under Florida law: ‘a substantial likelihood of success on the merits; lack of an adequate remedy at law; irreparable harm absent the entry of an injunction; and that injunctive relief will serve the public interest.’” *Liberty Counsel v. Fla. Bar Bd. of Governors*, 12 So. 3d 183, 186 n.7 (Fla. 2009) (quoting *Reform Party of Fla. v. Black*, 885 So. 2d 303, 305 (Fla. 2004)).

In the case at bar, the OAG meets all four parts of the applicable test in seeking entry of a temporary injunction.

A. Substantial Likelihood of Success on the Merits.

As shown above, the evidence clearly demonstrates that FCADV has suffered from gross mismanagement and violation of fiduciary duties in numerous ways, as its Board of Directors, through its lack of due care and diligence, has permitted the diversion of significant financial resources of the State of Florida and the federal government to FCADV’s officers, in particular Defendant Tiffany Carr, when instead those resources should have been directed to their intended beneficial purpose of aiding the victims of domestic violence and supporting the centers that are dedicated to protecting those victims.

B. Lack of an Adequate Remedy at Law.

Due to the immediacy of the leadership vacuum of FCADV and the imminent termination of its contract with DCF, there is simply no remedy at law that can reasonably bring about the objective of this action. Only the equitable remedy of the appointment of a receiver will be adequate to allow the orderly wind down and dissolution of FCADV.

C. Irreparable Harm Absent Entry of an Injunction.

The affidavits of the executives running domestic violence centers demonstrate the urgent need for a receiver to protect themselves and the victims of domestic violence. Indeed, the centers, domestic violence victims, and the public will suffer irreparable harm if a receiver is not appointed. There are no countervailing claims of harm that can credibly be asserted on behalf of FCADV.

D. The Public Interest.

The public interest, as set forth by the Legislature, has steadfastly been to support Florida's certified domestic violence centers for the protection and welfare of domestic violence victims. That public interest further has led the Legislature to end FCADV's statutory monopoly position as the pass-through agency bridging the gap between government funding and domestic violence recipients. No public interest can possibly warrant any contrary conclusion.

Conclusion

For all the reasons stated above, the Court should grant the motion; appoint a receiver of FCADV and the Foundation to perform the functions described above; enter a temporary injunction to preserve the assets of FCADV and the Foundation; and grant such further relief as the interests of justice and the public welfare require and the Court deems just and proper.

Respectfully Submitted,

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INDEX TO EXHIBITS

- Exhibit A** Articles of Incorporation for the Florida Coalition Against Domestic Violence, Inc.
- Exhibit B** Amended and Restated Corporate Bylaws of the Florida Coalition Against Domestic Violence
- Exhibit C** Form 990, FY2017-2018, for the Florida Coalition Against Domestic Violence, Inc.
- Exhibit D** Form 990, FY2016-2017, for the Florida Coalition Against Domestic Violence, Inc.
- Exhibit E** Form 990, FY2015-2016, for the Florida Coalition Against Domestic Violence, Inc.
- Exhibit F** Form 990, FY2014-2015, for the Florida Coalition Against Domestic Violence, Inc.
- Exhibit G** Compilation of News Articles
- Exhibit H** Complaint in *Fla. Dept. of Children and Families v. Fla. Coalition Against Domesic Violence, Inc.*
- Exhibit I** Form 990, FY2017-2018, for the Florida Coalition Against Domestic Violence Foundation, Inc.
- Exhibit J** Employment Procedures Manual
- Exhibit K** Amended Employment Agreement, 2014
- Exhibit L** Memorandum, 2016
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- Exhibit O** Paid Time Off Balance Sheet – 2017 Balance Sheet Audit

- Exhibit P** Memorandum, 2019
- Exhibit Q** Executive Committee Memorandum on Retirement
- Exhibit R** House of Representatives, Public Integrity & Ethics Committee – Public Hearing Transcript – *In Re: Florida Coalition Against Domestic Violence*, Volume 2 taken February 27, 2020
- Exhibit S** Summary of Compensation for Tiffany Carr
- Exhibit T** Board of Directors Policies “Compensation and Benefits”
- Exhibit U** Second Memorandum, 2016
- Exhibit V** Deposition of Melody Keeth, *In Re: Florida Coalition Against Domestic Violence*, taken February 24, 2020
- Exhibit W** Florida Department of Children and Families Contract with Florida Coalition Against Domestic Violence, Inc.
- Exhibit X** Deposition of Laurel Lynch, *In Re: Florida Coalition Against Domestic Violence*, taken February 24, 2020
- Exhibit Y** Deposition of Angela Diaz-Vidaillett, *In Re: Florida Coalition Against Domestic Violence*, taken February 24, 2020
- Exhibit Z** Affidavits from executives of certified domestic violence centers
- Exhibit AA** Florida Department of Children and Families Notice of Termination of Contract
- Exhibit BB** Articles of Incorporation for the Florida Coalition Against Domestic Violence Foundation, Inc.
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