

IN THE CIRCUIT COURT OF THE 17th JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

COREY AMANDA CAWTHON, an individual,

CASE NO.: CACE18-025690

Plaintiff,

vs.

A BETTER FLORIDA FOR ALL, an unregistered
political action committee, OMAR SMITH, an individual,
JACQUELINE RAMSEY, an individual, and
SOPHIA NELSON, an individual,

Filed In Open Court,
CLERK OF THE CIRCUIT COURT

ON 11-2-18

BY A Perez

Defendants,

ORDER GRANTING PLAINTIFF'S MOTION FOR INJUNCTIVE RELIEF:

THIS CAUSE having come before this Court on November 2, 2018 on the Plaintiff's Motion for Injunctive Relief, and the Court having reviewed the Plaintiff's Pleadings, having reviewed the subject Motion, and having conducted a hearing on said Motion after the provision of Notice of the Defendants, ^{who failed to appear} it is hereby **ORDERED AND ADJUDGED** as follows:

THE PLAINTIFF'S MOTION FOR ISSUANCE OF PRELIMINARY INJUNCTION IS HEREBY GRANTED.

1. Based upon this Court's review of the Plaintiff's Pleadings, the Plaintiff's Motions, and the evidence and testimony presented to the Court on November 2, 2018, the Court makes the following findings of fact in support of the issuance of this ex-parte preliminary injunction:
 - a. A BETTER FLORIDA FOR ALL was organized by OMAR SMITH, JACQUELINE RAMSEY, and SOPHIA NELSON on March 20, 2017, when a statement of Organization of Political Committee was filed with the Florida Department of State Division of Elections.

- b. Thereafter, the Defendants received contributions and expended those contributions in furtherance of their political agenda. In particular, the Defendants created and paid for the hosting of a website (<https://abetterfloridaforall.com>) which explains the Defendants' platform, and advances the Defendants' interest of seeing certain individuals elected to public office in the State of Florida.
- c. In particular, the Defendants promulgated a "Broward Voters Guide" with names of individuals which the Defendants supported for public office.
- d. On October 25, 2018, the Department of State Division of Elections cancelled and revoked A BETTER FLORIDA FOR ALL's registration. At that time, A BETTER FLORIDA FOR ALL ceased being a registered political committee.
- e. Subsequent thereto, the Defendants continued to advance and disseminate their political advertisements found on <https://abetterfloridaforall.com>, specifically including hard-copy versions of their "Broward Voters Guide", in direct violation of the political advertisement requirements of F.S. § 106.011 *et seq.* More specifically:
 - i. The "Broward Voters Guide" indicates that the candidates listed thereupon are approved by A BETTER FLORIDA FOR ALL, an unregistered political committee, which is a violation of F.S. § 106.143(1)(c);
 - ii. The "Broward Voters Guide" fails to indicate whether or not the candidates listed thereupon have approved the endorsement and advertising found in said Guide, which is a violation of F.S. § 106.143(4) and F.S. § 106.143(5)(a); and
 - iii. The "Broward Voters Guide" is being disseminated by the Defendants as a political advertisement in direct violation of F.S. § 106.03's requirement that

such a political advertisement be approved and promulgated by a registered political committee.

- f. The Court finds that the Defendants' actions as alleged are intended by the Defendants to unlawfully interfere with the upcoming November 6, 2018 election by way of illegal electioneering.
 - g. The Court finds that the Defendants possess no right to disseminate, or to continue disseminating, political advertisements to the voting public in violation of the requirements of § 106.011 *et seq.*
 - h. The Court finds that the Plaintiff, as a candidate for public office in the upcoming November 6, 2018 election, possesses no other recourse or remedy but for the immediate injunctive relief she has sought, and that she possesses no adequate remedy at law.
 - i. The Court finds that the public interest would be served by the issuance of injunctive relief to require the Defendants to immediately cease their unlawful conduct.
 - j. The Court finds that the Plaintiff possesses a substantial likelihood of ultimate success on the merits of the claim she has asserted, and that the Plaintiff has established a clear legal right to the relief which is granted herein.
2. Of note, the Court is particularly concerned about the misleading nature of the "Broward Voters Guide" which the Defendants are disseminating throughout the county. The Guide contains language indicating that "The voters guide was compiled in a collective manner by several elected officials and community leaders to present the best candidates included is guidance for whether you should choose Yes or no votes on the amendments that Community Leaders believe will best benefit our community." However, no "community leaders" or

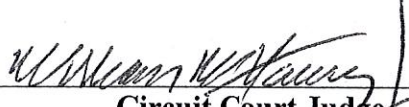
“elected officials” who support the information contained in the Guide are actually identified anywhere therein, and none of the named Defendants are elected officials holding public office in Broward County, Florida. The Defendants are also still actively seeking contributions to be used in further dissemination of the Broward Voters Guide through the <https://abetterfloridaforall.com>, even though A BETTER FLORIDA FOR ALL’s registration as a political committee has been revoked.

3. For the foregoing reasons, the Court enters this injunction requiring the Defendants to, until such time as any further Order(s) of this Court is/are issued:
 - a. Immediately remove all information accessible through <https://abetterfloridaforall.com>, as well as all of its sub-links and related sites;
 - b. Immediately cease and desist any and all further efforts to disseminate any hard-copy form or version of the “Broward Voters Guide” which was attached to the Plaintiff’s Complaint and Motion for Injunctive Relief.
4. This injunction is binding upon the Defendants, as well as any and all persons or parties claiming to act as agents of the Defendants for purposes of disseminating the A BETTER FLORIDA FOR ALL “Broward Voters Guide”.
5. Failure to comply with the requirements of this Order may result in issuance of an Order finding the Defendants in Contempt of Court.
6. Per Rule 1.610 of the Florida Rules of Civil Procedure, the Court finds that a bond in the amount of ^{1,000.00} ~~500.00~~ is reasonable to protect the interests of the Defendants in such an event as this Order is determined to be wrongfully issued and/or the Defendants’ conduct is or has been wrongfully enjoined.

7. Per Rule 1.610 of the Florida Rules of Civil Procedure, the Defendants may petition this Court to modify or dissolve this injunction, and upon receipt of any such petition a hearing will be set on same within five (5) days.

8. The Court further Orders: that this order shall not be
effective until the posting of the bond required
herein. The Clerk of Court shall receive the bond

IT IS SO DONE AND ORDERED ~~in Chambers~~ at Broward County, Florida this 2nd day of November, 2018. at 9:47 AM.


Circuit Court Judge

Copies furnished to:

- Andrew M. Schwartz, Esquire, 4755 Technology Way, Suite 103, Boca Raton, Florida 33341 (Counsel of record for the Plaintiff) [ams@amslegalteam.com; paralegal@amslegalteam.com]; and
- A Better Florida for All, Omar Smith, Jacqueline Ramsey and Sophia Nelson, 2930 Okeechobee Blvd, Suite 200, West Palm Beach, FL 33409 [info@abetterfloridaforall.com].

STATE OF FLORIDA
BROWARD COUNTY
I DO HEREBY CERTIFY the within and foregoing is a true
and correct copy of the original as it appears on record
and file in the office of the Circuit Court Clerk of Broward
County, Florida.
WITNESS my hand and Official Seal at Fort Lauderdale,
Florida this the NOV 02 day of 2018
ma... Deputy Clerk

