

STATE OF FLORIDA  
OFFICE OF THE STATE ATTORNEY  
SEVENTH JUDICIAL CIRCUIT  
PRETRIAL INTERVENTION CONTRACT

NAME CASE# DC# U90426  
Jane Kai Shang

It is alleged that you have committed an offense against the State of Florida on or about August 28, 2018, to wit:

I. SUBMISSION OF FALSE VOTER IDENTIFICATION INFORMATION  
II. UNQUALIFIED ELECTOR WILLFULLY VOTING

in violation of (F.S.) 104.011 and 104.15. After an investigation of the offense and your background it appears that the interests of the State of Florida and your own will best be served by the following procedures, therefore:

On the authority of R.J. LARIZZA, State Attorney, in and for the Seventh Judicial Circuit, Florida, prosecuting in this matter for said violation will be deferred for a period of 12 **Months** from this date provided you abide by the following conditions:

- (1) You shall refrain from violation of any law (Federal, State and Local). In the event of a criminal arrest while on the Program you are subject to automatic dismissal.
- (2) No later than the fifth day of each month, or at the direction of your Pretrial Intervention Officer, you will make a full and truthful report to your officer on the form provided for that purpose.
- (3) You shall:
  - (a) maintain or actively seek gainful employment, such as weekly job employment logs or
  - (b) pursue a course of study as a full-time student;
  - (c) advise your employer of your Pretrial Intervention Supervision and current charges or  provide a current pay sub for verification; and
  - (d) support your dependents to the best of your ability
- (4) You shall **immediately** inform the Pretrial Intervention Officer of any change in residence, employment or arrest.
- (5) You will allow an investigation of your personal background and make yourself available for the services of the Pretrial Intervention Program. You shall also answer truthfully all inquiries by your Pretrial Intervention Officer and allow the officer to visit your home, employment, school or elsewhere, and carry out all instructions.
- (6) You will pay to the State of Florida at the rate of **\$50.00** per month toward the cost of your supervision, plus a 4% administrative processing fee in accordance with Florida Statutes 945.31 and 948.09.  Waived
- (7) You will not use intoxicants to excess and will be required to submit to urinalysis as directed by your Pretrial Intervention Officer.
- (8) You shall not leave the county of your residence without first procuring the consent of your Pretrial Intervention Officer. *Employment purposes will be authorized upon notification to probation officer.*
- (9) You shall pay to the Department of Corrections a **\$2.00 per month** surcharge fee for each month you are under supervision pursuant to Section 948.09(1)(2), F. S. *If the cost of supervision is waived for any months of supervision, this fee shall be exempt for the same period.*
- (10) You shall **pay one dollar (\$1.00) per month** for each month under supervision to be dispersed to **First Step, Inc.**, a non-profit organization, in accordance with Florida Statute 948.02
- (11) You shall **pay a mandatory one time Drug Fee of Thirty Dollars (\$30.00)**, as directed by your Pretrial Intervention Officer.

**\*\*continued on following page\***  
**\*\* SPECIAL CONDITIONS \*\***

**NOTE: ALL FINANCIAL OBLIGATIONS SHALL BE PAID TO THE DEPARTMENT OF CORRECTIONS AND SHALL HAVE A 4% PROCESSING CHARGE ASSESSED AS REQUIRED BY F. S. 945.31, UNLESS OTHERWISE DIRECTED.**

- (12) You shall pay a total of \$100.00, for cost of prosecution, as directed by your officer.
- (13) You shall pay law enforcement investigative costs in the amount of \$ 5,178.83, to be dispersed to:

- Volusia County Sheriff's Office
- Daytona Beach Police Department
- Holly Hill Police Department
- Ormond Beach Police Department
- Port Orange Police Department
- Deland Police Department
- Orange City Police Department
- Edgewater Police Department
- Oak Hill Police Department
- Daytona Beach Shores Police Department
- Other: Florida Department of Law Enforcement

- (14) You shall be required to do the following conditions as directed and approved by your Pretrial Intervention Supervisor:

- a)  Substance abuse evaluation and any recommended treatment
- b)  Anger Management Class
- c)  Mental health evaluation and any recommended treatment
- d)  Moral Reconciliation Therapy Program (MRT)
- e)  Anti-Theft/Impulse Control Class
- f)  Parenting Class
- g)  Write a letter of apology
- h)  Have no contact, directly/indirectly, with victim(s): \_\_\_\_\_
- i)  Do not trespass or return to scene of offense
- j)  **Must perform ONE HUNDRED (100) hours of community service.**
- k)  Sign the Disqualification Consent Agreement if requested and/or required.
- l)  **OTHER: 12 MONTHS SUPERVISION, 100 HOURS COMMUNITY SERVICE, \$100 COST OF PROSECUTION, \$5,178.83 COST OF INVESTIGATION TO FDLE, LETTER ACKNOWLEDGING ACTIONS AND ACCEPTING RESPONSIBILITY**

- (15)  You shall pay restitution in the amount of \$ N/A to the following:
- Jointly and severally liable with co-defendant(s): \_\_\_\_\_  
Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
Phone: \_\_\_\_\_

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Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
Phone: \_\_\_\_\_

**\*\*continued on following page\*\***

It is understood that this agreement is a deferral of prosecution. If its terms are violated in any essential respect, or if any conditions are not completed within sixty (60) days prior to termination date, the prosecution may be commenced. If the agreement is not violated, no criminal prosecution concerning this charge will be instituted in this circuit. The initial charge will be dismissed and the State of Florida will be barred from prosecution. It is also understood that if this agreement is revoked that I will not be given any credit for time spent on Pretrial Intervention toward any sentence I might receive as a result of a conviction from the charge stated herein.

Defendant's Initials: JKS Defense Counsel Initials: WV Assistant State Attorney's Initials: \_\_\_\_\_

*By signing this agreement, the defendant waives his or her rights to a speedy trial in this cause under the Constitution and Laws of Florida and the United States of America. The supervision period will begin upon the signing of the contract by the State.*

Defendant's Initials: JKS Defense Counsel Initials: WV Assistant State Attorney's Initials: \_\_\_\_\_

Jane Kai Shang 6/4/2019  
JANE KAI SHANG / DATE  
Christopher G Walker 6/5/19  
CHRISTOPHER G WALKER / DATE  
ASSISTANT STATE ATTORNEY

Warren Lindsey  
WARREN LINDSEY  
DEFENSE ATTORNEY

JoAnn Coleman  
PROGRAM ADMINISTRATOR

Department of Corrections  
Name: JoAnn Coleman (print)  
Phone: 386-947-3520

Jane K. Shang statement  
DC# U90426

When I planned to move to Deltona in 2015, I initially lived in a hotel in Lake Mary. Because the position of City Manager sometimes can carry personal security and privacy risks, especially for a woman, I took steps to make confidential my home address and other information pursuant to Florida Statute s.119.071(4)(f). That statutory provision exempts from inspection, copying and release the home address, telephone number, date of birth and photographs of current or former managers of any local government agencies in most situations. This would include my position as City Manager of Deltona. For that reason, I used the City Hall address on my driver's license since about June 2015 or around the time I came to work for the City of Deltona. The Department of Motor Vehicles allows this. As part of having the address of City Hall on my driver's license, I must have carried that over to my voter registration address. I acknowledge that was a mistake and oversight on my part, although not done willfully or intentionally. I mistakenly erred in not complying with the voter identification information and for that, I continue to sincerely apologize for that unintentional mistake and error. When the personal error was brought to my attention I immediately corrected the unintentional mistake.

*Jane Kai Shang*  
6/4/2019

**FLORIDA DEPARTMENT OF CORRECTIONS**  
**Pretrial Intervention Program**

REFERRAL/PERSONAL CONTACT

DATE: \_\_\_\_\_ OFFICE \_\_\_\_\_

NAME: JANE KAI SHANG PHONE: \_\_\_\_\_

AGE: 59 DOB: 7/26/1958 RACE: A SEX: F REFERRAL  
DATE: 5/2/2019

ADDRESS: 771 MOUNTAIN ASH WAY, DELTONA, FLORIDA 32725

DEFENSE COUNSEL: WARREN LINDSEY, 1150 LOUISIANA AVE., SUITE 2, WINTER PARK, FLORIDA 32789 ; (407)644-4044

COURT: CIRCUIT CLERK #: N/A

ARRESTING AGENCY: FDLE ORLANDO REGIONAL OPS CENTER OFFICER'S NAME: ADMIN TED SILBERSTEIN

OFFENSE: I. SUBMISSION OF FALSE VOTER IDENTIFICATION INFORMATION  
II. UNQUALIFIED ELECTOR WILLFULLY VOTING

ATTORNEY: CHRISTOPHER G WALKER

PRETRIAL INTERVENTION INVESTIGATOR: \_\_\_\_\_

REFERRAL SOURCE: STATE ATTORNEY'S OFFICE

DESIRED PROGRAM: YES

PRIOR RECORD: ADULT NO JUVENILE NO INTENT TO  
REMAIN \_\_\_\_\_

PROBLEMS: ALCOHOL N/A DRUG N/A MENTAL N/A  
OTHER \_\_\_\_\_

ACCEPT \_\_\_\_\_ REJECT/REASON \_\_\_\_\_

1. SPECIAL CONDITION(S): \_\_\_\_\_

12 MONTHS SUPERVISION, 100 HOURS COMMUNITY SERVICE, \$100 COST OF PROSECUTION, \$5,178.83 COST OF INVESTIGATION TO FDLE, LETTER ACKNOWLEDGING ACTIONS AND ACCEPTING RESPONSIBILITY

2. **ADMISSION STATEMENT ATTACHED FOR DEFENDANT'S  
SIGNATURE: \_\_\_NO\_\_\_\_\_**

3. **APPROVED BY: \_\_\_\_\_**

STATE OF FLORIDA  
OFFICE OF THE STATE ATTORNEY  
SEVENTH JUDICIAL CIRCUIT  
PRETRIAL INTERVENTION CONTRACT

NAME      CASE #   DC# \_\_\_\_\_

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- g)  Write a letter of apology
- h)  Have no contact, directly/indirectly, with victim(s): \_\_\_\_\_
  
- i)  Do not trespass or return to scene of offense
- j) X **Must perform ONE HUNDRED (100) hours of community service.**
- k)  Sign the Disqualification Consent Agreement if requested and/or required.
- l) X **OTHER: 12 MONTHS SUPERVISION, 100 HOURS COMMUNITY SERVICE, \$100 COST OF PROSECUTION, \$5,178.83 COST OF INVESTIGATION TO FDLE, LETTER ACKNOWLEDGING ACTIONS AND ACCEPTING RESPONSIBILITY**

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**Defendant's Initials: \_\_\_\_\_ Defense Counsel Initials: \_\_\_\_\_ Assistant State Attorney's Initials: \_\_\_\_\_**

*By signing this agreement, the defendant waives his or her rights to a speedy trial in this cause under the Constitution and Laws of Florida and the United States of America. The supervision period will begin upon the signing of the contract by the State.*

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\_\_\_\_\_  
JANE KAI SHANG / DATE

\_\_\_\_\_  
CHRISTOPHER G WALKER / DATE  
ASSISTANT STATE ATTORNEY

\_\_\_\_\_  
WARREN LINDSEY  
DEFENSE ATTORNEY

\_\_\_\_\_  
PROGRAM ADMINISTRATOR

Department of Corrections

Name: \_\_\_\_\_ (print)

Phone: \_\_\_\_\_

# Florida Department of Law Enforcement

Case Number: OR-32-0014

Seventh Judicial Circuit of Florida

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## Investigative Summary

False swearing; submission of false voter registration information

FSS 104.011 – Four (4) Counts

Unqualified electors willfully voting

FSS 104.15 – Two (2) Counts

### Incident Date:

- 1) August 25, 2016
- 2) October 29, 2016
- 3) August 19, 2018
- 4) November 3, 2018

### Case Agent:

Special Agent Ted Silberstein

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Victim:

State of Florida

Subject:

Jane Kai Shang  
A/F, DOB: 07/26/1958

████████████████████  
771 Mountain Ash Way  
Deltona, Florida 32725

Incident Location:

Deltona Regional Library  
(Early Voting Location)  
2150 Eustace Avenue  
Deltona, Florida 32725

## Summary of Events

On January 14, 2019, the State Attorney for the Seventh Circuit requested FDLE conduct an investigation into an allegation of violation of election laws by Deltona City Manager Jane Shang. Shang is alleged to have used the address of Deltona City Hall as her home address on her voter registration, and consequently voted in races she was not otherwise qualified to vote in, in violation of Florida Statutes 104.011 and 104.15 respectively.

The Florida Department of State, Office of the General Counsel (OGC), and FDLE received anonymous complaints reporting the allegation against Shang. FDLE Special Agent (SA) Ted Silberstein contacted the OGC, who informed SA Silberstein that the OGC was conducting a preliminary investigation of the allegation, and would refer the matter to the State Attorney if warranted. On January 14, 2019, the OGC authored a letter to the State Attorney indicating "the issue appears to have merit," and referred the matter to the State Attorney for investigation. The OGC also sent a copy of the letter to SA Silberstein. The State Attorney subsequently requested FDLE conduct the investigation.

## Law Enforcement Interviews

### Review of Supervisor of Elections Records

On January 18, 2019, at 0830 hours, SA Silberstein met with Lisa Lewis, Supervisor of Elections (SOE) for Volusia County, Florida at the SOE Office, 125 West New York Avenue, Deland, Florida.

SOE Lewis provided SA Silberstein of an Audit Report of Shang's voter history. The history included registration addresses, written correspondence from Shang to the SOE, sample ballots, and other documents. All copies of documents were certified copies, provided by SOE Lewis. The following is a synopsis:

#### Registration and Correspondence

- Shang was registered to vote in Manatee County, where her registered address was 6115 90<sup>th</sup> Avenue Circle East, Parish, Florida 34219 from 2012 until June 18, 2015.
- On June 18, 2015, Shang registered to vote in Volusia County through the Driver License Office at the same time she updated her driver license address. The address Shang indicated on her updated driver license and her voter registration was 2345 Providence Boulevard, Deltona, Florida (Deltona City Hall). The Volusia County SOE received Shang's voter registration from the Driver License Office.
- In a letter dated August 5, 2015, from Shang to the Volusia County SOE, Shang requested her voter registration card which she had not yet received. Shang's letter requested the registration card be mailed to her at 2345 Providence Boulevard, Deltona, Florida.
- On December 10, 2018, Shang contacted the SOE by phone to correct the home address listed on her voter registration to her physical residence of 771 Mountain Ash Way, Deltona, Florida, but maintained the Deltona City Hall address as her mailing address.

#### Voting History

- On August 25, 2016, Shang voted early for the August 30, 2016 primary election, and on October 29, 2016, voted early for the November 8, 2016 general election. These elections were the gubernatorial and presidential elections that did not include any Deltona city elections. Shang voted early at the early voting site, the Deltona Regional Library, 2150 Eustace Avenue, Deltona, Florida. During the early voting period, any voter can vote at any of the early voting sites.
- On August 19, 2018, Shang voted early for the August 28, 2018 primary election, and on November 3, voted early for the November 6, 2018 general election. These elections included local City of Deltona elections. Shang voted early at the early voting site, the Deltona Regional Library, 2150 Eustace Avenue, Deltona, Florida. During the early voting period, any voter can vote at any of the early voting

sites, however, for local elections, voters are only eligible to vote in elections specific to the voting districts in which they reside.

- In the above-described 2018 local elections, Shang voted in the elections for Deltona Commission Seat 1, the ballot for the address she indicated on her voter registration, 2345 Providence Boulevard, Deltona, Florida (Deltona City Hall)
- Sample ballot 422AN and sample ballot 423AN for the primary and general elections respectively are included.

In all of the above-described elections, voters are required to sign a voting certificate which contains the election and ballot information specific to the voters' home address. On the certificate, voters are required to swear to an oath of accuracy of their birth date, and residential address, and sign the oath. On all of her voting certificates for each of the 2016 and 2018 primary and general elections in which she voted, Shang listed her residential address as 2345 Providence Boulevard, Deltona, Florida (Deltona City Hall). Shang signed the oath as follows:

I, Jane K Shang, am a qualified elector in this election and a registered voter of Volusia County Florida. I do solemnly swear (or affirm) that I am the person so listed on the voter registration rolls of Volusia County and that I reside at the listed address. I understand that if I commit or attempt to commit fraud in connection with voting, vote a fraudulent ballot, or vote more than once in an election I could be convicted of a felony of the third degree and both fined up to \$5,000 and imprisoned for up to 5 years. I understand that my failure to sign this certificate invalidates my ballot.

Certified copies of the following documents signed by SOE Lewis were obtained:

- SOE pamphlet listing Public Officials Serving Volusia County
- SOE profile sheet listing Shang's residential address as "Protected," and Deltona City Hall as her mailing address
- SOE profile sheet (updated) listing 771 Mountain Ash Way, Deltona, Florida, as Shang's residential address, and Deltona City Hall as her mailing address
- SOE Audit Report for Shang
- SOE voting history for Shang
- Scanned image of Shang's signature on file with SOE, received from the Driver License Office, where Shang registered to vote
- Letter dated August 5, 2015 from Shang to the SOE requesting her voter registration card
- SOE Telephone Request for Change of Address dated December 10, 2018, from Shang, changing her residential address on her voter registration from the Deltona City Hall address, to her residential address of 771 Mountain Ash Way, Deltona, Florida
- Shang's Early Voting Certificate for the August 28, 2018 Primary Election, including the ballot for Deltona District 1 (133), Ballot 422AN, with the oath signed by Shang on August 19, 2018
- Shang's Early Voting Certificate for the November 6, 2018 General Election, including the ballot for Deltona District 1 (134), Ballot 422A, with the oath signed by Shang on November 3, 2018
- Deltona District 3 Primary Election Sample Ballot 423AN for the August 28, 2018 election
- Deltona District 3 General Election Sample Ballot 423A, for the November 6, 2018 election
- Shang's Early Voting Certificate dated August 26, 2016, for the August 30, 2016 Statewide Primary Election (126), Ballot 422AN (including sample ballot)
- Shang's Early Voting Certificate dated October 29, 2016, for November 8, 2016 Statewide General Election, Ballot 422A (including sample ballot)
- Laminated card with Oath of Affirmation of voter's registration information, that is placed at the EVID voter signature screen at the voting location where voters sign in to vote

#### **Department of Highway Safety and Motor Vehicles Voter Registration Procedure**

On February 4, 2019, SA Silberstein spoke with Barbara Peacock, of the Bureau of Issuance Oversight, for the Florida Department of Highway Safety and Motor Vehicles (DHSMV). Ms. Peacock indicated the following:

Shang obtained her Florida driver license on June 17, 2015, at a Florida Licensing On Wheels mobile unit number V11. Shang applied for her voter registration as part of the driver license application transaction.

Ms. Peacock indicated that an individual registering to vote through the DHSMV must provide their actual residential address. During the registration, a DHSMV representative informs the registrant of the oath that is administered to the registrant twice; at the beginning and end of the transaction, and the registrant signs the oath. SA Silberstein confirmed that Shang's Driver and Vehicle Information Database (DAVID) record contains Shang's voter registration with her signature on the oath. The following is the oath:

Under penalty of perjury, I swear or affirm that the information given by me in this application is true and correct. I also understand the operation of a motor vehicle constitutes consent to any sobriety test required by law and consent to release of driver records required by law.

The DHSMV record indicates that the residential address Shang provided on the application is 2345 Providence Boulevard, Deltona, Florida (Deltona City Hall).

### **Interview with Jane Shang**

On February 1, 2019, at 1028 hours, SA Silberstein and SA David Snowden conducted a voluntary, sworn, and recorded interview with Jane Shang. The interview was conducted at the Deltona Veterans Memorial, 1921 Evarad Avenue, Deltona, Florida. Prior to beginning the interview, SA Silberstein informed Shang that the statement she was about to give was part of the criminal investigation into an allegation of violation of election laws, that she was not being compelled in any way to provide the statement, and that she was free to terminate the proceeding at any time and leave. Shang was asked if she understood this information, and she said, "I do." The following is a synopsis of Shang's statement:

Shang began by stating she tries to be a good person and it was not her intention to break the law. Shang's professional background is in transportation. She has a Bachelor's degree in Organizational Behavior. Shang indicated she was an attorney with a Juris Doctorate degree but has not practiced law in approximately 20 years, and switched from being an attorney to being a manager.

Shang indicated she held many government positions. Shang previously lived and worked in Boston before moving to Parrish, in Manatee County, Florida near Tampa in 2004, where she worked as the Director of Engineering for the Hillsborough Area Regional Transit Authority (HART). When the recession hit, she moved to Texas, and then back to Florida in 2015. Shang began her employment as Deltona City Manager on June 1, 2015. Upon arriving in Florida in 2015, Shang lived in an extended stay hotel for approximately two months until establishing a permanent residence.

Shang obtained her Florida driver license through the Florida Licensing On Wheels (FLOW Mobile), which is a mobile driver license office that visited Deltona City Hall. When obtaining her driver license, Shang provided the address of Deltona City Hall for her mailing address. Shang indicated she was told by individuals at the DMV (Division of Motor Vehicles) that an exemption allowed her to use her mailing address on her driver license because of her position as a City Manager. Shang regularly received her mail at Deltona City Hall. Shang said that when applying for her driver license, "There must have been a question of, 'Do you want to register [to vote], and I probably said yes.'" Shang believed they took her Deltona City Hall address from DMV for her address on her voter registration. Shang did not recall filling out any voter registration forms or oaths in which she swore that the address on her voter registration was her residential address.

[NOTE] On August 5, 2015, Shang wrote and signed a letter to the Supervisor of Elections (SOE) stating she completed her voter registration application approximately one month earlier, but never received her voter registration card. Shang requested a replacement voter registration card be mailed to her at 2345 Providence Boulevard, Deltona (Deltona City Hall). This belies Shang's statement that she did not recall applying for her voter registration. This letter was obtained from the SOE and is documented in IR #2.

Shang was asked if she is familiar with voting, knows how to vote, and has voted before moving to Volusia County, Florida, and she said, "Yes." Shang was asked if it was her understanding that where a person votes, and the local elections they vote in is relevant to where a person lives, and Shang said, "Yes."

Shang indicated she voted at the early voting location. Shang was asked for her photo identification by the poll worker; however, she did not believe she was asked to sign an oath or verify that the address on her voter registration was her residential address.

Shang recalled she checked in with a poll worker at the voting location for the primary and general elections in 2016 and 2018 (four elections). SA Silberstein showed Shang a photograph of the EVID, which is the computer at the voting location where voters sign in to vote. The photograph depicted the EVID's electronic signature pad upon which the voters sign electronically on the signature pad. The photograph further depicted the oath of accuracy that is placed in front of the EVID signature pad. The oath, on a laminated card, notifies the voter that by signing the signature pad, they are swearing under oath that the address on their voter registration is their residential address, and that providing false information regarding their address is a felony offense. Shang looked at the photograph and acknowledged that the oath card is conspicuously in plain view in front of the EVID signature pad. When asked if she knew the reason why the oath card was placed there, Shang said, "To read it and to make sure you do read it, and obviously I didn't read it." SA Silberstein asked Shang if she would care to read the oath card now, and Shang read it. Shang acknowledged that the oath card informed the voter that by signing, they are swearing under oath that the residential address they have provided is correct and true. Shang agreed that the address she provided on her voter registration was not correct or true.

Shang did not recall whether she read the oath or signed the electronic signature pad. Shang said that if the records show that she signed, then she probably did, but she only "vaguely" remembered signing on the electronic signature pad. Shang acknowledged that in each of the elections, after checking in, she was given a ballot, and she proceeded to vote. Shang voted with the ballots she was given, which was for voters who live in Deltona District 1, the district which includes the address of 2345 Providence Boulevard, (Deltona City Hall).

Shang was shown the ballots for the 2018 primary and general elections she voted with that included Deltona's District 1 Commission Seat and Mayoral races. In the primary election, Shang voted for a mayoral candidate, but she said she could not recall whether she voted for a commission seat candidate. In the general election, Shang acknowledged she voted for both a mayoral candidate and a commission seat candidate. Shang acknowledged that she knows and understands that in the election process, election ballots are specific to the voting district where voters reside. SA Silberstein asked Shang, given her knowledge and understanding of the process, wouldn't she immediately recognize that the ballot she was given was the wrong ballot for her residential address of 771 Mountain Ash Way, and ask for the correct ballot. Shang replied, "That would be very logical, but it went right over my head, I just did not pay attention." Shang insisted that "it did not cognitively register" with her that the ballot for District 1 that she was given contained different races than the ballot for her residential address (District 3). Shang said that she depended on the SOE to give her the correct ballot, but agreed that the SOE gave her a ballot that corresponded to the address she provided on her voter registration, that of Deltona City Hall. Shang repeated multiple times during the interview that "it did not cognitively register in her mind" that she was voting with the wrong ballot for her actual residential address.

Shang acknowledged that during the December 17, 2018, Deltona Commission Meeting, she stated that she registered to vote with the Deltona City Hall address as her residential address and voted accordingly, but that it was an oversight on her part.

Shang stated that her "better half," Alex Fuleki, who lives with her at her actual residence was with her when they went to vote in the elections, and that Fuleki voted too. Shang indicated that during the 2018 elections, it was an aggressive unpleasant atmosphere, and critics of hers were following her and taking pictures of her at the voting location. Shang wanted to vote and leave the voting location as quickly as possible so as not to subject Fuleki to the hostility. Shang was asked if she knew whether Fuleki voted with the ballot from District 1 for the Deltona City Hall address as she did. Shang said that although they voted at the same time, and she voted with the District 1 ballot for the Deltona City Hall address, Fuleki voted with the correct District 3 ballot for their actual residence. When asked how that could happen, Shang said, "I had one of those stupid moments, it did not register my head," and, "It should have but it didn't."

Shang was shown copies of her early voting certificates for the 2016 and 2018 primary and general elections containing her signatures and the oath of address. Shang acknowledged the signatures on the oaths were hers.

At the conclusion of the interview, Shang made the following statements: "Sometimes you take things granted, you sign things automatically. Obviously, I did not read very carefully, and that's my own fault, that's my stupidity. With the ballot it just didn't register." "It was a stupid oversight on my part. I admitted it happened, and I should have changed it. I didn't. Stupid things happen, I'm not perfect. This was stupid. I didn't do it on purpose. I will not deny that it happened. It was an oversight." However, Shang indicated that it is also her belief it was the responsibility of the SOE to send her a letter notifying her that the address she provided on her voter registration was a government building and not her residential address, but she never received such a letter from the SOE.

Shang said she contacted the SOE to correct her residential address information after the issue relating to her voter registration came to her attention.

### **Interview with Joyce Raftery**

On January 24, at 0850 hours, SA Silberstein and SA Snowden conducted a voluntary, sworn, and recorded interview with Joyce Irene Kent Raftery, City Clerk for the City of Deltona. The interview was conducted in Raftery's office inside the Deltona City Hall, 2345 Providence Boulevard, Deltona, Florida. The following is a synopsis of the interview:

Raftery is the City Clerk, and Shang is her supervisor. Raftery first became aware of the voter fraud allegation against Shang in a newspaper article. After the news article appeared, Shang called Raftery and asked her about address exemptions, including what forms to use for various exemptions, and asked Raftery to contact various offices, including the Supervisor of Elections, the Library, and the Property Appraiser, to obtain exemption forms from those offices. Raftery contacted several offices and obtained exemption forms and gave them to Shang, but Raftery did not assist Shang in filling out any of the forms or assist Shang in any other way to include submitting any of them on Shang's behalf. Raftery said that providing various forms to city employees for them to fill out is something that her office or the city's Human Resources office might routinely do to assist employees.

After the allegation surfaced in the newspaper, Shang explained to Raftery that she went to the DMV office to update her driver license, and the DMV allowed Shang to use the Deltona City Hall address on her driver license. The DMV asked Shang if she also wanted to update her voter registration and Shang said yes, and the City Hall address is what was put onto her voter registration. Raftery said that Shang uses the City Hall address as her mailing address and receives her mail at City Hall. Raftery said that after Shang corrected her residential address on her voter registration when the complaint surfaced, Shang's new voter registration card came to her in the mail at City Hall. Raftery saw Shang's new voter registration card when it arrived at City Hall, and saw that it now had Shang's actual residential address on it.

Raftery had no prior knowledge of Shang using the City Hall address on her voter registration before the allegation surfaced, and had no knowledge of which elections or precincts Shang voted in since Shang moved to Deltona.

Raftery has had no conversations with Shang about the allegations other than obtaining exemption forms for her.

### **Interview with Lee Lopez**

On January 24, at 1012 hours, SA Silberstein and SA Snowden conducted a voluntary, sworn, and recorded interview with Leopold Rene Lopez, Public Information Officer (PIO) for the City of Deltona. The interview was conducted in media room 150B inside the Deltona City Hall, 2345 Providence Boulevard, Deltona, Florida. The following is a synopsis of the interview:

Lopez is the PIO for the City of Deltona. In his capacity as the PIO, Lopez was quoted in a newspaper article, in which he stated that Shang had "no ill intent" when she used the Deltona City Hall address on her voter registration. Lopez said Shang informed him about the allegation approximately one day before it was reported in the newspaper. Lopez indicated Shang told him that upon moving to Deltona, before having a permanent address to receive mail, she used the City Hall address as her mailing address. Lopez indicated Shang told him that after she established a permanent residence, it slipped her mind to update her voter registration. Lopez indicated Shang instructed him to convey that point in speaking with the media. Lopez' statement to the newspaper, that there was "no ill intent" behind Shang's use of the City Hall address on her voter registration, was his own choice of words used to convey his interpretation of what Shang told him. Lopez was unsure if he had additional conversations with Shang concerning the allegation.

Lopez had no prior knowledge of Shang using the City Hall address on her voter registration before the allegation surfaced.

**Video Review**

On January 23, 2018, SA Silberstein conducted a thorough review of video evidence related to this case. The video reviewed is of the December 17, 2018, and January 22, 2019, Deltona City Commission Meetings, held at Deltona City Hall, 2345 Providence Boulevard, Deltona, Florida, at 1830 hours. The meetings were live streamed, and videos of the meetings were posted on the City of Deltona website. In all cases, the time given is the elapsed time on the video. The following is a synopsis of relevant statements Shang made during the December 17, 2018 Deltona Commission Meeting depicted in the video:

December 17, 2018, Deltona City Commission Meeting, 1830 hours

Elapsed Time	Description
00:56:30	Shang addressed the audience and the Deltona city commissioners. Shang acknowledged she used the Deltona City Hall address on her driver's license since June 2015 as allowed by an exemption. In explaining the City Hall address on her voter registration, Shang stated, "It must have been a carryover in regards to [voter] registration." Shang said, "I admit it was an oversight on my part. It was a mistake that I made. It was not intentional in any way. I did make a mistake and I admit that. It was an oversight." Shang said when she found out about it, she corrected her address information on her voter registration.

**Witnesses**

**Civilian Witnesses**

Name	Address
Joyce Irene Raftery	3900 Yorktowne Blvd, Apt#102, Port Orange, Florida 32129
Leopold Rene Lopez	30646 Apricot Avenue, Eustis, Florida 32736
Lisa Lews	Volusia County Supervisor of Elections, 125 W. New York Ave, Deland, Florida 32720
Barbara Peacock	Florida DHSMV 2900 Apalachee Parkway Tallahassee, Florida 32399





## Conclusion – Probable Cause

The Florida Department of Law Enforcement (FDLE) has completed a comprehensive investigation into the election laws violations committed by Jane K. Shang. SA Silberstein believes that probable cause has been established that on the following dates and location, Shang violated the below-listed felony offenses:

- Count 1)** Florida Statute 104.011, False swearing; submission of false voter registration information.- On August 25, 2016, at Deltona Regional Library, 2150 Eustace Avenue, Deltona, in Volusia County, Florida, Shang did falsely swear under oath and sign on her Early Voting Certificate for the August 30, 2016 primary election, that her residential address was 2345 Providence Boulevard, Deltona, Florida (Deltona City Hall), when her residential address was 771 Mountain Ash Way, Deltona, Florida.
- Count 2)** Florida Statute 104.011, False swearing; submission of false voter registration information.- On October 29, 2016, at Deltona Regional Library, 2150 Eustace Avenue, Deltona, in Volusia County, Florida, Shang did falsely swear under oath and sign on her Early Voting Certificate for the November 8, 2016 general election, that her residential address was 2345 Providence Boulevard, Deltona, Florida (Deltona City Hall), when her residential address was 771 Mountain Ash Way, Deltona, Florida.
- Count 3)** Florida Statute 104.011, False swearing; submission of false voter registration information.- On August 19, 2018, at Deltona Regional Library, 2150 Eustace Avenue, Deltona, in Volusia County, Florida, Shang did falsely swear under oath and sign on her Early Voting Certificate for the August 28, 2018 primary election, that her residential address was 2345 Providence Boulevard, Deltona, Florida (Deltona City Hall), when her residential address was 771 Mountain Ash Way, Deltona, Florida.
- Count 4)** Florida Statute 104.011, False swearing; submission of false voter registration information.- On November 3, 2018, at Deltona Regional Library, 2150 Eustace Avenue, Deltona, in Volusia County, Florida, Shang did falsely swear under oath and sign on her Early Voting Certificate for the November 6, 2018 general election, that her residential address was 2345 Providence Boulevard, Deltona, Florida (Deltona City Hall), when her residential address was 771 Mountain Ash Way, Deltona, Florida.
- Count 5)** Florida Statute 104.15, Unqualified electors willfully voting.- On August 19, 2018, at Deltona Regional Library, 2150 Eustace Avenue, Deltona, in Volusia County, Florida, Shang voted in the August 28, 2018 primary election, voting in Deltona District 1, which included elections for Deltona Commission Seat 1, and Mayor, under her mailing address of 2345 Providence Boulevard, Deltona, Florida (Deltona City Hall), located within a district in which Shang was unqualified to vote. Shang was only qualified to vote in Deltona District 3, where her residential address of 771 Mountain Ash Way, Deltona, Florida is located.
- Count 6)** Florida Statute 104.15, Unqualified electors willfully voting.- On November 3, 2018, at Deltona Regional Library, 2150 Eustace Avenue, Deltona, in Volusia County, Florida, Shang voted in the November 6, 2018 general election, voting in Deltona District 1, which included elections for Deltona Commission Seat 1, and Mayor, under her mailing address of 2345 Providence Boulevard, Deltona, Florida (Deltona City Hall), located within a district in which Shang was unqualified to vote. Shang was only qualified to vote in Deltona District 3, where her residential address of 771 Mountain Ash Way, Deltona, Florida is located.

This presentation of facts is based on corroborating documents provided by the Volusia County Supervisor of Elections and the Florida DHSMV, interviews with civilian witnesses, and audio and video evidence, to wit; Shang's voluntary, sworn and recorded statement, and video of the December 17, 2018, Deltona Commission Meeting, during which Shang acknowledged committing the above-described offenses, albeit by mistake.

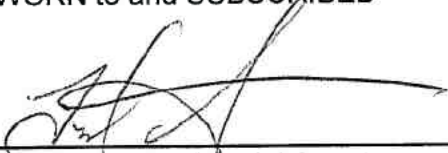
On June 17, 2015, at Deltona City Hall, 2345 Providence Boulevard, Deltona, Florida, in Volusia County, Florida, Shang did falsely swear under oath while applying for her driver license and voter registration, that her residential address was 2345 Providence Boulevard, Deltona, Florida (Deltona City Hall), when her actual residence was 771 Mountain Ash Way, Deltona, Florida, in violation of Florida Statute 104.011, False swearing; submission of false voter registration information. However, SA Silberstein notes that the statute of limitations has expired on this count.

**Notarizations**

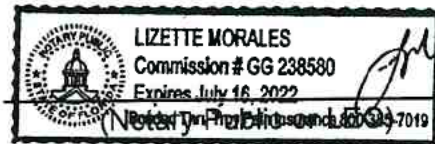
I swear that the foregoing is a true and accurate summary of facts either personally known to me, or derived from statements provided to me or to other law enforcement officers during the course of this investigation.

SWORN to and SUBSCRIBED

this 14<sup>th</sup> day of February, 2019



Ted Silberstein, Special Agent  
Florida Department of Law Enforcement  
Orlando Regional Operations Center  
500 West Robinson Street  
Orlando, Florida 32801



# Florida Department of Law Enforcement Case Delivery Receipt



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*Ted Silberstein*

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And received by the following representative of such office:

Accepted by:

Noel Griffin

Title:

Chief Investigator

Signature:

*Noel Griffin*

Florida Department of Law Enforcement  
Orlando Regional Operations Center

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(407) 245-0801

# FDLE Electronic Case File User Guide



Your computer will need to have Adobe Acrobat Reader 6 or above to view this file. If you don't have this software you may download it for free at [www.get.adobe.com/reader](http://www.get.adobe.com/reader)

To easily navigate the document from any page use the bookmarks located on the left side of the EBook.

Everything in blue is fully interactive and linked to its counterpart within the document.

If there is a document related to the Investigative Report you may access it on the page following the last page of the Investigative Report.

**Audio** - accessible in 3 ways.

- If the investigative report has a related **audio** item, a box containing the play icon will be located on the top left corner of the Investigative Report. By clicking on the play icon the audio content will begin to play.
- You can access any audio files by opening the attachments file on the bottom portion of the bookmarks section. In newer versions of Acrobat Reader it does not say "attachments," the attachment folder is symbolized as a paperclip.
- Media content may be located in a separate folder on the DVD outside of the EBook.

You can use the zoom tool at the top portion of the document to easily expand or shrink the pages for ease of viewing.

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- Photos/video will be located outside of the EBook program in a separate folder titled with its respective name.

**If you have any questions please contact:**

*Magda Martinez*

*FDLE Orlando*

*407-540-3864*

*MagdaMartinez@fdle.state.fl.us*

## Summary of Events

On January 14, 2019, the State Attorney for the Seventh Circuit requested FDLE conduct an investigation into an allegation of violation of election laws by Deltona City Manager Jane Shang. Shang is alleged to have used the address of Deltona City Hall as her home address on her voter registration, and consequently voted in races she was not otherwise qualified to vote in, in violation of Florida Statutes 104.011 and 104.15 respectively.

The Florida Department of State, Office of the General Counsel (OGC), and FDLE received anonymous complaints reporting the allegation against Shang. FDLE Special Agent (SA) Ted Silberstein contacted the OGC, who informed SA Silberstein that the OGC was conducting a preliminary investigation of the allegation, and would refer the matter to the State Attorney if warranted. On January 14, 2019, the OGC authored a letter to the State Attorney indicating "the issue appears to have merit," and referred the matter to the State Attorney for investigation. The OGC also sent a copy of the letter to SA Silberstein. The State Attorney subsequently requested FDLE conduct the investigation.

## Law Enforcement Interviews

### Review of Supervisor of Elections Records

On January 18, 2019, at 0830 hours, SA Silberstein met with Lisa Lewis, Supervisor of Elections (SOE) for Volusia County, Florida at the SOE Office, 125 West New York Avenue, Deland, Florida.

SOE Lewis provided SA Silberstein of an Audit Report of Shang's voter history. The history included registration addresses, written correspondence from Shang to the SOE, sample ballots, and other documents. All copies of documents were certified copies, provided by SOE Lewis. The following is a synopsis:

#### Registration and Correspondence

- Shang was registered to vote in Manatee County, where her registered address was 6115 90<sup>th</sup> Avenue Circle East, Parish, Florida 34219 from 2012 until June 18, 2015.
- On June 18, 2015, Shang registered to vote in Volusia County through the Driver License Office at the same time she updated her driver license address. The address Shang indicated on her updated driver license and her voter registration was 2345 Providence Boulevard, Deltona, Florida (Deltona City Hall). The Volusia County SOE received Shang's voter registration from the Driver License Office.
- In a letter dated August 5, 2015, from Shang to the Volusia County SOE, Shang requested her voter registration card which she had not yet received. Shang's letter requested the registration card be mailed to her at 2345 Providence Boulevard, Deltona, Florida.
- On December 10, 2018, Shang contacted the SOE by phone to correct the home address listed on her voter registration to her physical residence of 771 Mountain Ash Way, Deltona, Florida, but maintained the Deltona City Hall address as her mailing address.

#### Voting History

- On August 25, 2016, Shang voted early for the August 30, 2016 primary election, and on October 29, 2016, voted early for the November 8, 2016 general election. These elections were the gubernatorial and presidential elections that did not include any Deltona city elections. Shang voted early at the early voting site, the Deltona Regional Library, 2150 Eustace Avenue, Deltona, Florida. During the early voting period, any voter can vote at any of the early voting sites.
- On August 19, 2018, Shang voted early for the August 28, 2018 primary election, and on November 3, 2018, voted early for the November 6, 2018 general election. These elections included local City of Deltona elections. Shang voted early at the early voting site, the Deltona Regional Library, 2150 Eustace Avenue, Deltona, Florida. During the early voting period, any voter can vote at any of the early voting

sites, however, for local elections, voters are only eligible to vote in elections specific to the voting districts in which they reside.

- In the above-described 2018 local elections, Shang voted in the elections for Deltona Commission Seat 1, the ballot for the address she indicated on her voter registration, 2345 Providence Boulevard, Deltona, Florida (Deltona City Hall)
- Sample ballot 422AN and sample ballot 423AN for the primary and general elections respectively are included.

In all of the above-described elections, voters are required to sign a voting certificate which contains the election and ballot information specific to the voters' home address. On the certificate, voters are required to swear to an oath of accuracy of their birth date, and residential address, and sign the oath. On all of her voting certificates for each of the 2016 and 2018 primary and general elections in which she voted, Shang listed her residential address as 2345 Providence Boulevard, Deltona, Florida (Deltona City Hall). Shang signed the oath as follows:

I, Jane K Shang, am a qualified elector in this election and a registered voter of Volusia County Florida. I do solemnly swear (or affirm) that I am the person so listed on the voter registration rolls of Volusia County and that I reside at the listed address. I understand that if I commit or attempt to commit fraud in connection with voting, vote a fraudulent ballot, or vote more than once in an election I could be convicted of a felony of the third degree and both fined up to \$5,000 and imprisoned for up to 5 years. I understand that my failure to sign this certificate invalidates my ballot.

Certified copies of the following documents signed by SOE Lewis were obtained:

- SOE pamphlet listing Public Officials Serving Volusia County
- SOE profile sheet listing Shang's residential address as "Protected," and Deltona City Hall as her mailing address
- SOE profile sheet (updated) listing 771 Mountain Ash Way, Deltona, Florida, as Shang's residential address, and Deltona City Hall as her mailing address
- SOE Audit Report for Shang
- SOE voting history for Shang
- Scanned image of Shang's signature on file with SOE, received from the Driver License Office, where Shang registered to vote
- Letter dated August 5, 2015 from Shang to the SOE requesting her voter registration card
- SOE Telephone Request for Change of Address dated December 10, 2018, from Shang, changing her residential address on her voter registration from the Deltona City Hall address, to her residential address of 771 Mountain Ash Way, Deltona, Florida
- Shang's Early Voting Certificate for the August 28, 2018 Primary Election, including the ballot for Deltona District 1 (133), Ballot 422AN, with the oath signed by Shang on August 19, 2018
- Shang's Early Voting Certificate for the November 6, 2018 General Election, including the ballot for Deltona District 1 (134), Ballot 422A, with the oath signed by Shang on November 3, 2018
- Deltona District 3 Primary Election Sample Ballot 423AN for the August 28, 2018 election
- Deltona District 3 General Election Sample Ballot 423A, for the November 6, 2018 election
- Shang's Early Voting Certificate dated August 26, 2016, for the August 30, 2016 Statewide Primary Election (126), Ballot 422AN (including sample ballot)
- Shang's Early Voting Certificate dated October 29, 2016, for November 8, 2016 Statewide General Election, Ballot 422A (including sample ballot)
- Laminated card with Oath of Affirmation of voter's registration information, that is placed at the EVID voter signature screen at the voting location where voters sign in to vote

### **Department of Highway Safety and Motor Vehicles Voter Registration Procedure**

On February 4, 2019, SA Silberstein spoke with Barbara Peacock, of the Bureau of Issuance Oversight, for the Florida Department of Highway Safety and Motor Vehicles (DHSMV). Ms. Peacock indicated the following:

Shang obtained her Florida driver license on June 17, 2015, at a Florida Licensing On Wheels mobile unit number V11. Shang applied for her voter registration as part of the driver license application transaction.

Ms. Peacock indicated that an individual registering to vote through the DHSMV must provide their actual residential address. During the registration, a DHSMV representative informs the registrant of the oath that is administered to the registrant twice; at the beginning and end of the transaction, and the registrant signs the oath. SA Silberstein confirmed that Shang's Driver and Vehicle Information Database (DAVID) record contains Shang's voter registration with her signature on the oath. The following is the oath:

Under penalty of perjury, I swear or affirm that the information given by me in this application is true and correct. I also understand the operation of a motor vehicle constitutes consent to any sobriety test required by law and consent to release of driver records required by law.

The DHSMV record indicates that the residential address Shang provided on the application is 2345 Providence Boulevard, Deltona, Florida (Deltona City Hall).

### Interview with Jane Shang

On February 1, 2019, at 1028 hours, SA Silberstein and SA David Snowden conducted a voluntary, sworn, and recorded interview with Jane Shang. The interview was conducted at the Deltona Veterans Memorial, 1921 Evard Avenue, Deltona, Florida. Prior to beginning the interview, SA Silberstein informed Shang that the statement she was about to give was part of the criminal investigation into an allegation of violation of election laws, that she was not being compelled in any way to provide the statement, and that she was free to terminate the proceeding at any time and leave. Shang was asked if she understood this information, and she said, "I do." The following is a synopsis of Shang's statement:

Shang began by stating she tries to be a good person and it was not her intention to break the law. Shang's professional background is in transportation. She has a Bachelor's degree in Organizational Behavior. Shang indicated she was an attorney with a Juris Doctorate degree but has not practiced law in approximately 20 years, and switched from being an attorney to being a manager.

Shang indicated she held many government positions. Shang previously lived and worked in Boston before moving to Parrish, in Manatee County, Florida near Tampa in 2004, where she worked as the Director of Engineering for the Hillsborough Area Regional Transit Authority (HART). When the recession hit, she moved to Texas, and then back to Florida in 2015. Shang began her employment as Deltona City Manager on June 1, 2015. Upon arriving in Florida in 2015, Shang lived in an extended stay hotel for approximately two months until establishing a permanent residence.

Shang obtained her Florida driver license through the Florida Licensing On Wheels (FLOW Mobile), which is a mobile driver license office that visited Deltona City Hall. When obtaining her driver license, Shang provided the address of Deltona City Hall for her mailing address. Shang indicated she was told by individuals at the DMV (Division of Motor Vehicles) that an exemption allowed her to use her mailing address on her driver license because of her position as a City Manager. Shang regularly received her mail at Deltona City Hall. Shang said that when applying for her driver license, "There must have been a question of, 'Do you want to register [to vote], and I probably said yes.'" Shang believed they took her Deltona City Hall address from DMV for her address on her voter registration. Shang did not recall filling out any voter registration forms or oaths in which she swore that the address on her voter registration was her residential address.

[NOTE] On August 5, 2015, Shang wrote and signed a letter to the Supervisor of Elections (SOE) stating she completed her voter registration application approximately one month earlier, but never received her voter registration card. Shang requested a replacement voter registration card be mailed to her at 2345 Providence Boulevard, Deltona (Deltona City Hall). This belies Shang's statement that she did not recall applying for her voter registration. This letter was obtained from the SOE and is documented in IR #2.



Shang was asked if she is familiar with voting, knows how to vote, and has voted before moving to Volusia County, Florida, and she said, "Yes." Shang was asked if it was her understanding that where a person votes, and the local elections they vote in is relevant to where a person lives, and Shang said, "Yes."

Shang indicated she voted at the early voting location. Shang was asked for her photo identification by the poll worker; however, she did not believe she was asked to sign an oath or verify that the address on her voter registration was her residential address.

Shang recalled she checked in with a poll worker at the voting location for the primary and general elections in 2016 and 2018 (four elections). SA Silberstein showed Shang a photograph of the EVID, which is the computer at the voting location where voters sign in to vote. The photograph depicted the EVID's electronic signature pad upon which the voters sign electronically on the signature pad. The photograph further depicted the oath of accuracy that is placed in front of the EVID signature pad. The oath, on a laminated card, notifies the voter that by signing the signature pad, they are swearing under oath that the address on their voter registration is their residential address, and that providing false information regarding their address is a felony offense. Shang looked at the photograph and acknowledged that the oath card is conspicuously in plain view in front of the EVID signature pad. When asked if she knew the reason why the oath card was placed there, Shang said, "To read it and to make sure you do read it, and obviously I didn't read it." SA Silberstein asked Shang if she would care to read the oath card now, and Shang read it. Shang acknowledged that the oath card informed the voter that by signing, they are swearing under oath that the residential address they have provided is correct and true. Shang agreed that the address she provided on her voter registration was not correct or true.

Shang did not recall whether she read the oath or signed the electronic signature pad. Shang said that if the records show that she signed, then she probably did, but she only "vaguely" remembered signing on the electronic signature pad. Shang acknowledged that in each of the elections, after checking in, she was given a ballot, and she proceeded to vote. Shang voted with the ballots she was given, which was for voters who live in Deltona District 1, the district which includes the address of 2345 Providence Boulevard, (Deltona City Hall).

Shang was shown the ballots for the 2018 primary and general elections she voted with that included Deltona's District 1 Commission Seat and Mayoral races. In the primary election, Shang voted for a mayoral candidate, but she said she could not recall whether she voted for a commission seat candidate. In the general election, Shang acknowledged she voted for both a mayoral candidate and a commission seat candidate. Shang acknowledged that she knows and understands that in the election process, election ballots are specific to the voting district where voters reside. SA Silberstein asked Shang, given her knowledge and understanding of the process, wouldn't she immediately recognize that the ballot she was given was the wrong ballot for her residential address of 771 Mountain Ash Way, and ask for the correct ballot. Shang replied, "That would be very logical, but it went right over my head, I just did not pay attention." Shang insisted that "it did not cognitively register" with her that the ballot for District 1 that she was given contained different races than the ballot for her residential address (District 3). Shang said that she depended on the SOE to give her the correct ballot, but agreed that the SOE gave her a ballot that corresponded to the address she provided on her voter registration, that of Deltona City Hall. Shang repeated multiple times during the interview that "it did not cognitively register in her mind" that she was voting with the wrong ballot for her actual residential address.

Shang acknowledged that during the December 17, 2018, Deltona Commission Meeting, she stated that she registered to vote with the Deltona City Hall address as her residential address and voted accordingly, but that it was an oversight on her part.

Shang stated that her "better half," Alex Fuleki, who lives with her at her actual residence was with her when they went to vote in the elections, and that Fuleki voted too. Shang indicated that during the 2018 elections, it was an aggressive unpleasant atmosphere, and critics of hers were following her and taking pictures of her at the voting location. Shang wanted to vote and leave the voting location as quickly as possible so as not to subject Fuleki to the hostility. Shang was asked if she knew whether Fuleki voted with the ballot from District 1 for the Deltona City Hall address as she did. Shang said that although they voted at the same time, and she voted with the District 1 ballot for the Deltona City Hall address, Fuleki voted with the correct District 3 ballot for their actual residence. When asked how that could happen, Shang said, "I had one of those stupid moments, it did not register my head," and, "It should have but it didn't."

Shang was shown copies of her early voting certificates for the 2016 and 2018 primary and general elections containing her signatures and the oath of address. Shang acknowledged the signatures on the oaths were hers.

At the conclusion of the interview, Shang made the following statements: "Sometimes you take things granted, you sign things automatically. Obviously, I did not read very carefully, and that's my own fault, that's my stupidity. With the ballot it just didn't register." "It was a stupid oversight on my part. I admitted it happened, and I should have changed it. I didn't. Stupid things happen, I'm not perfect. This was stupid. I didn't do it on purpose. I will not deny that it happened. It was an oversight." However, Shang indicated that it is also her belief it was the responsibility of the SOE to send her a letter notifying her that the address she provided on her voter registration was a government building and not her residential address, but she never received such a letter from the SOE.

Shang said she contacted the SOE to correct her residential address information after the issue relating to her voter registration came to her attention.

### **Interview with Joyce Raftery**

On January 24, at 0850 hours, SA Silberstein and SA Snowden conducted a voluntary, sworn, and recorded interview with Joyce Irene Kent Raftery, City Clerk for the City of Deltona. The interview was conducted in Raftery's office inside the Deltona City Hall, 2345 Providence Boulevard, Deltona, Florida. The following is a synopsis of the interview:

Raftery is the City Clerk, and Shang is her supervisor. Raftery first became aware of the voter fraud allegation against Shang in a newspaper article. After the news article appeared, Shang called Raftery and asked her about address exemptions, including what forms to use for various exemptions, and asked Raftery to contact various offices, including the Supervisor of Elections, the Library, and the Property Appraiser, to obtain exemption forms from those offices. Raftery contacted several offices and obtained exemption forms and gave them to Shang, but Raftery did not assist Shang in filling out any of the forms or assist Shang in any other way to include submitting any of them on Shang's behalf. Raftery said that providing various forms to city employees for them to fill out is something that her office or the city's Human Resources office might routinely do to assist employees.

After the allegation surfaced in the newspaper, Shang explained to Raftery that she went to the DMV office to update her driver license, and the DMV allowed Shang to use the Deltona City Hall address on her driver license. The DMV asked Shang if she also wanted to update her voter registration and Shang said yes, and the City Hall address is what was put onto her voter registration. Raftery said that Shang uses the City Hall address as her mailing address and receives her mail at City Hall. Raftery said that after Shang corrected her residential address on her voter registration when the complaint surfaced, Shang's new voter registration card came to her in the mail at City Hall. Raftery saw Shang's new voter registration card when it arrived at City Hall, and saw that it now had Shang's actual residential address on it.

Raftery had no prior knowledge of Shang using the City Hall address on her voter registration before the allegation surfaced, and had no knowledge of which elections or precincts Shang voted in since Shang moved to Deltona.

Raftery has had no conversations with Shang about the allegations other than obtaining exemption forms for her.

### **Interview with Lee Lopez**

On January 24, at 1012 hours, SA Silberstein and SA Snowden conducted a voluntary, sworn, and recorded interview with Leopold Rene Lopez, Public Information Officer (PIO) for the City of Deltona. The interview was conducted in media room 150B inside the Deltona City Hall, 2345 Providence Boulevard, Deltona, Florida. The following is a synopsis of the interview:

Lopez is the PIO for the City of Deltona. In his capacity as the PIO, Lopez was quoted in a newspaper article, in which he stated that Shang had "no ill intent" when she used the Deltona City Hall address on her voter registration. Lopez said Shang informed him about the allegation approximately one day before it was reported in the newspaper. Lopez indicated Shang told him that upon moving to Deltona, before having a permanent address to receive mail, she used the City Hall address as her mailing address. Lopez indicated Shang told him that after she established a permanent residence, it slipped her mind to update her voter registration. Lopez indicated Shang instructed him to convey that point in speaking with the media. Lopez' statement to the newspaper, that there was "no ill intent" behind Shang's use of the City Hall address on her voter registration, was his own choice of words used to convey his interpretation of what Shang told him. Lopez was unsure if he had additional conversations with Shang concerning the allegation.

Lopez had no prior knowledge of Shang using the City Hall address on her voter registration before the allegation surfaced.

**Video Review**

On January 23, 2018, SA Silberstein conducted a thorough review of video evidence related to this case. The video reviewed is of the December 17, 2018, and January 22, 2019, Deltona City Commission Meetings, held at Deltona City Hall, 2345 Providence Boulevard, Deltona, Florida, at 1830 hours. The meetings were live streamed, and videos of the meetings were posted on the City of Deltona website. In all cases, the time given is the elapsed time on the video. The following is a synopsis of relevant statements Shang made during the December 17, 2018 Deltona Commission Meeting depicted in the video:

December 17, 2018, Deltona City Commission Meeting, 1830 hours

Elapsed Time	Description
00:56:30	Shang addressed the audience and the Deltona city commissioners. Shang acknowledged she used the Deltona City Hall address on her driver's license since June 2015 as allowed by an exemption. In explaining the City Hall address on her voter registration, Shang stated, "It must have been a carryover in regards to [voter] registration." Shang said, "I admit it was an oversight on my part. It was a mistake that I made. It was not intentional in any way. I did make a mistake and I admit that. It was an oversight." Shang said when she found out about it, she corrected her address information on her voter registration.

**Witnesses**

**Civilian Witnesses**

Name	Address
Joyce Irene Raftery	3900 Yorktowne Blvd, Apt#102, Port Orange, Florida 32129
Leopold Rene Lopez	30646 Apricot Avenue, Eustis, Florida 32736
Lisa Lews	Volusia County Supervisor of Elections, 125 W. New York Ave, Deland, Florida 32720
Barbara Peacock	Florida DHSMV 2900 Apalachee Parkway Tallahassee, Florida 32399

## Conclusion – Probable Cause

The Florida Department of Law Enforcement (FDLE) has completed a comprehensive investigation into the election laws violations committed by Jane K. Shang. SA Silberstein believes that probable cause has been established that on the following dates and location, Shang violated the below-listed felony offenses:

- Count 1) **Florida Statute 104.011, False swearing; submission of false voter registration information.** On August 25, 2016, at Deltona Regional Library, 2150 Eustace Avenue, Deltona, in Volusia County, Florida, Shang did falsely swear under oath and sign on her Early Voting Certificate for the August 30, 2016 primary election, that her residential address was 2345 Providence Boulevard, Deltona, Florida (Deltona City Hall), when her residential address was 771 Mountain Ash Way, Deltona, Florida.
- Count 2) **Florida Statute 104.011, False swearing; submission of false voter registration information.** On October 29, 2016, at Deltona Regional Library, 2150 Eustace Avenue, Deltona, in Volusia County, Florida, Shang did falsely swear under oath and sign on her Early Voting Certificate for the November 8, 2016 general election, that her residential address was 2345 Providence Boulevard, Deltona, Florida (Deltona City Hall), when her residential address was 771 Mountain Ash Way, Deltona, Florida.
- Count 3) **Florida Statute 104.011, False swearing; submission of false voter registration information.** On August 19, 2018, at Deltona Regional Library, 2150 Eustace Avenue, Deltona, in Volusia County, Florida, Shang did falsely swear under oath and sign on her Early Voting Certificate for the August 28, 2018 primary election, that her residential address was 2345 Providence Boulevard, Deltona, Florida (Deltona City Hall), when her residential address was 771 Mountain Ash Way, Deltona, Florida.
- Count 4) **Florida Statute 104.011, False swearing; submission of false voter registration information.** On November 3, 2018, at Deltona Regional Library, 2150 Eustace Avenue, Deltona, in Volusia County, Florida, Shang did falsely swear under oath and sign on her Early Voting Certificate for the November 6, 2018 general election, that her residential address was 2345 Providence Boulevard, Deltona, Florida (Deltona City Hall), when her residential address was 771 Mountain Ash Way, Deltona, Florida.
- Count 5) **Florida Statute 104.15, Unqualified electors willfully voting.** On August 19, 2018, at Deltona Regional Library, 2150 Eustace Avenue, Deltona, in Volusia County, Florida, Shang voted in the August 28, 2018 primary election, voting in Deltona District 1, which included elections for Deltona Commission Seat 1, and Mayor, under her mailing address of 2345 Providence Boulevard, Deltona, Florida (Deltona City Hall), located within a district in which Shang was unqualified to vote. Shang was only qualified to vote in Deltona District 3, where her residential address of 771 Mountain Ash Way, Deltona, Florida is located.
- Count 6) **Florida Statute 104.15, Unqualified electors willfully voting.** On November 3, 2018, at Deltona Regional Library, 2150 Eustace Avenue, Deltona, in Volusia County, Florida, Shang voted in the November 6, 2018 general election, voting in Deltona District 1, which included elections for Deltona Commission Seat 1, and Mayor, under her mailing address of 2345 Providence Boulevard, Deltona, Florida (Deltona City Hall), located within a district in which Shang was unqualified to vote. Shang was only qualified to vote in Deltona District 3, where her residential address of 771 Mountain Ash Way, Deltona, Florida is located.

*did not  
admit X*

This presentation of facts is based on corroborating documents provided by the Volusia County Supervisor of Elections and the Florida DHSMV, interviews with civilian witnesses, and audio and video evidence, to wit; Shang's voluntary, sworn and recorded statement, and video of the December 17, 2018, Deltona Commission Meeting, during which Shang acknowledged committing the above-described offenses, albeit by mistake.

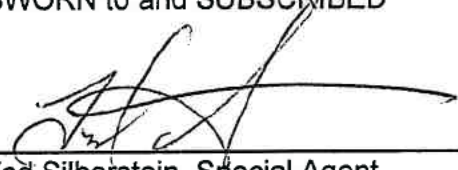
On June 17, 2015, at Deltona City Hall, 2345 Providence Boulevard, Deltona, Florida, in Volusia County, Florida, Shang did falsely swear under oath while applying for her driver license and voter registration, that her residential address was 2345 Providence Boulevard, Deltona, Florida (Deltona City Hall), when her actual residence was 771 Mountain Ash Way, Deltona, Florida, in violation of Florida Statute 104.011, False swearing; submission of false voter registration information. However, SA Silberstein notes that the statute of limitations has expired on this count.

**Notarizations**

I swear that the foregoing is a true and accurate summary of facts either personally known to me, or derived from statements provided to me or to other law enforcement officers during the course of this investigation.

SWORN to and SUBSCRIBED

this 14<sup>th</sup> day of February, 2019

  
\_\_\_\_\_  
Ted Silberstein, Special Agent  
Florida Department of Law Enforcement  
Orlando Regional Operations Center  
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Orlando, Florida 32801

