STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

In Re: Florida Voters Campaign PAC

TO: Florida Voters Campaign PAC Michael Dobson, Chair 4005 Brandon Hill Drive Tallahassee, FL 32309 Case No.: FEC 19-291

Division of Elections 500 S Bronough Street, Room 316 Tallahassee, FL 32399

NOTICE OF HEARING (INFORMAL HEARING)

A hearing will be held in this case before the Florida Elections Commission on, **December 1, 2020 at 8:30 AM**, *or as soon thereafter as the parties can be heard*, at the following location: **Senate Office Building, 404 South Monroe Street, Room 110-S, Tallahassee, Florida 32399.** Due to heightened security access requirements, please bring only essential items into the building and plan to arrive early to allow for delays coming through security.

Failure to appear in accordance with this notice will constitute a waiver of your right to participate in the hearing. Continuances will be granted only upon a showing of good cause.

This hearing will be conducted pursuant to Section 106.25, Florida Statutes, which governs your participation as follows:

If you are the Respondent, you may attend the hearing, and you or your attorney will have 5 minutes to present your case to the Commission. However, some cases (including those in which consent orders or recommendations for no probable cause are being considered) may be decided by an *en masse* vote and, unless you request to be heard or the Commission requests that your case be considered separately on the day of the hearing, your case will *not* be individually heard.

If you are the Complainant, you may attend the hearing, but you will *not* be permitted to address the Commission. In addition, some cases (including those in which consent orders or recommendations for no probable cause are being considered) may be decided by an *en masse* vote and, unless the Respondent requests to be heard or the Commission requests that the case be considered separately on the day of the hearing, the case will *not* be individually heard.

If you are an Appellant, and you have requested a hearing, you may attend the hearing, and you or your attorney will have 5 *minutes* to present your case to the Commission.

Please be advised that both confidential and public cases are scheduled to be heard by the Florida Elections Commission on this date. As an Appellant, Respondent or Complainant in one case, you will *not* be permitted to attend the hearings on other confidential cases.

The Commission will electronically record the meeting. Although the Commission's recording is considered the official record of the hearing, the Respondent may provide, at his own expense, a certified court reporter to also record the hearing.

If you require an accommodation due to a disability, contact Donna Ann Malphurs at (850) 922-4539 or by mail at 107 West Gaines Street, The Collins Building, Suite 224, Tallahassee, Florida 32399, at least 5 days before the hearing.

See further instructions on the reverse side.

Tim Vaccaro

Executive Director Florida Elections Commission November 9, 2020 Please refer to the information below for further instructions related to your particular hearing:

If this is a hearing to consider **an appeal from an automatic fine**, the Filing Officer has imposed a fine on you for your failure to file a campaign treasurer's report on the designated due date and, by filing an appeal, you have asked the Commission to consider either (1) that the report was in fact timely filed; or (2) that there were unusual circumstances that excused the failure to file the report timely. You are required to prove your case. If the Commission finds that the report was filed timely or that there were unusual circumstances that excused the failure, it may waive the fine, in whole or in part. The Commission may reduce a fine after considering the factors in Section 106.265, Florida Statutes. If the Commission finds that the report was not timely filed and there were no unusual circumstances, the fine will be upheld.

If this is a hearing to consider a **consent order before a determination of probable cause has been made**, the Commission will decide whether to accept or reject the consent order. If the Commission accepts the consent order, the case will be closed and become public. If the Commission rejects the consent order or does not make a decision to accept or deny the consent order, the case will remain confidential, unless confidentiality has been waived.

If this is a hearing to consider a **consent order after a determination of probable cause has been made**, the Commission will decide whether to accept or reject the consent order. If the Commission accepts the consent order, the case will be closed. If the Commission rejects the consent order or does not make a decision to accept or deny the consent order, the Respondent will be entitled to another hearing to determine if the Respondent committed the violation(s) alleged.

If this is a **probable cause hearing**, the Commission will decide if there is probable cause to believe that the Respondent committed a violation of Florida's election laws. Respondent should be prepared to explain how the staff in its recommendation incorrectly applied the law to the facts of the case. *Respondent may not testify, call others to testify, or introduce any documentary or other evidence at the probable cause hearing*. The Commission will only decide whether Respondent should be *charged* with a violation and, before the Commission determines whether a violation has occurred or a fine should be imposed, Respondent will have an opportunity for another hearing at which evidence may be introduced.

If this is an **informal hearing**, it will be conducted pursuant Sections 120.569 and 120.57(2), Florida Statutes; Chapter 28 and Commission Rule 2B-1.004, Florida Administrative Code. At the hearing, the Commission will decide whether the Respondent committed the violation(s) charged in the Order of Probable Cause. The Respondent will be permitted to testify. However, the Respondent may not call witnesses to testify.

Respondent may argue why the established facts in the Staff Recommendation do not support the violations charged in the Order of Probable Cause. At Respondent's request, the Commission may determine whether Respondent's actions in the case were willful. The Respondent may also address the appropriateness of the recommended fine. If Respondent claims that his limited resources make him unable to pay the statutory fine, *he must provide the Commission with written proof of his financial resources* at the hearing. A financial affidavit form is available from the Commission Clerk.

STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

Florida Elections Commission, Petitioner,

v.

Case No.: FEC 19-291

Florida Voters Campaign PAC, Respondent.

ORDER OF PROBABLE CAUSE

THIS MATTER was heard by the Florida Elections Commission (Commission) at its regularly scheduled meeting on August 25, 2020, in Tallahassee, Florida.

On February 10, 2020, Staff recommended to the Commission there was probable cause to believe the Florida Election Code was violated. The facts articulated in Staff's Recommendation are adopted by reference and incorporated herein. Based on the Referral, Report of Investigation, Staff's Recommendation, and oral statements, if any, made at the probable cause hearing, the Commission finds there is **probable cause** to charge Respondent with the following violation:

Count 1:

On or about March 11, 2019, Florida Voters Campaign PAC violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2019 M2 Report.

DONE AND ORDERED by the Florida Elections Commission on August 25, 2020.

Joni Alexis Poitier, Vice Chair Forida Elections Commission

Copies furnished to: Eric M. Lipman, General Counsel Florida Voters Campaign PAC, Respondent Division of Election, Complainant

NOTICE OF RIGHT TO A HEARING

As the Respondent, you may elect to resolve this case in several ways. First, you may elect to resolve this case by <u>consent order</u> where you and Commission staff agree to resolve the violation(s) and agree to the amount of the fine. The consent order is then presented to the Commission for its approval. To discuss a consent order, contact the FEC attorney identified in the Order of Probable Cause.

Second, you may request an <u>informal hearing</u> held before the Commission, if you <u>do not</u> dispute any material fact in the Staff Recommendation. You have 30 days from the date the Order of Probable Cause is filed with the Commission to request such a hearing. The date this order was filed appears in the upper right-hand corner of the first page of the order. At the hearing, you will have the right to make written or oral arguments to the Commission concerning the legal issues related to the violation(s) and the potential fine. At the request of Respondent, the Commission will consider and determine willfulness at an informal hearing. Otherwise, live witness testimony is unnecessary.

Third, you may request a <u>formal hearing</u> held before an administrative law judge in the Division of Administrative Hearings (DOAH), if you dispute any material fact in the Staff Recommendation. You have 30 days from the date the Order of Probable Cause is filed with the Commission to request such a hearing. The date this order was filed appears in the upper righthand corner of the first page of the order. At the hearing, you will have the right to present evidence relevant to the violation(s) listed in this order, to cross-examine opposing witnesses, to impeach any witness, and to rebut the evidence presented against you.

If you do not elect to resolve the case by consent order or request a formal hearing at the DOAH or an informal hearing before the Commission within 30 days of the date this Order of Probable Cause is filed with the Commission, the case will be sent to the Commission for a formal or informal hearing, depending on whether the facts are in dispute. The date this order was filed appears in the upper right-hand corner of the first page of the order.

To request a hearing, please send a written request to the Commission Clerk, Donna Ann Malphurs.

The address of the Commission Clerk is 107 W. Gaines Street, Collins Building, Suite 224, Tallahassee, Florida 32399-1050. The telephone number is (850) 922-4539. The Clerk will provide you with a copy of Chapter 28-106, *Florida Administrative Code*, and other applicable rules upon request. No mediation is available.

P:/Order of Probable Cause.docx (07/14) FEC Case *19-291

STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

In Re: Florida Voters Campaign PAC

TO: Florida Voters Campaign PAC Michael Dobson, Chair 4005 Brandon Hill Drive Tallahassee, FL 32309

Case No.: FEC 19-291

Division of Elections 500 S Bronough Street, Room 316 Tallahassee, FL 32399

NOTICE OF HEARING (PROBABLE CAUSE DETERMINATION)

A hearing will be held in this case before the Florida Elections Commission on **August 25, 2020**. The Commission will begin **at 8:30 am, EST**, and will consider multiple cases that day.

Please note that because of COVID-19, this will be a virtual meeting conducted by remote video or teleconference. Enclosed you will find additional details on joining the video conference via ZOOM, Meeting ID 340 226 0750, or via teleconference by dialing (929) 205-6099 and entering the meeting access code 673802, when prompted. If you wish to speak before the Commission, you will need to appear by webcam and will be sworn in remotely. Please be advised that the Commission will consider multiple cases, so you will need to wait until your case is considered. If you have any questions, please contact Commission staff at (850) 922-4539.

Failure to appear in accordance with this notice will constitute a waiver of your right to participate in the hearing. Continuances will be granted only upon a showing of good cause.

This hearing will be conducted pursuant to Section 106.25, Florida Statutes, which governs your participation as follows:

If you are the Respondent, you may attend the hearing, and you or your attorney will have 5 minutes to present your case to the Commission. However, some cases (including those in which motions to dismiss or recommendations for no probable cause are being considered) may be decided by an *en masse* vote and, unless you request to be heard or the Commission requests that your case be considered separately on the day of the hearing, your case will *not* be individually heard.

If you are the Complainant, you may attend the hearing, but you will *not* be permitted to address the Commission. In addition, some cases (including those in which motions to dismiss or recommendations for no probable cause are being considered) may be decided by an *en masse* vote and, unless the Respondent requests to be heard or the Commission requests that the case be considered separately on the day of the hearing, the case will *not* be individually heard.

If you are an Appellant, and you have requested a hearing, you may attend the hearing, and you or your attorney will have 5 *minutes* to present your case to the Commission.

Please be advised that both confidential and public cases are scheduled to be heard by the Florida Elections Commission. As an Appellant, Respondent or Complainant in one case, you will *not* be permitted to attend the hearings on other confidential cases.

The Commission will electronically record the meeting. Although the Commission's recording is considered the official record of the hearing, the Respondent may provide, at his own expense, a certified court reporter to also record the hearing.

If you require an accommodation due to a disability, contact Donna Ann Malphurs at (850) 922-4539 or by mail at 107 West Gaines Street, The Collins Building, Suite 224, Tallahassee, Florida 32399, at least 5 days before the hearing.

See further instructions on the reverse side.

Tim Vaccaro

Executive Director Florida Elections Commission August 13, 2020 Please refer to the information below for further instructions related to your particular hearing:

If this is a hearing to consider **an appeal from an automatic fine**, the Filing Officer has imposed a fine on you for your failure to file a campaign treasurer's report on the designated due date and, by filing an appeal, you have asked the Commission to consider either (1) that the report was in fact timely filed; or (2) that there were unusual circumstances that excused the failure to file the report timely. You are required to prove your case. If the Commission finds that the report was filed timely or that there were unusual circumstances that excused the failure, it may waive the fine, in whole or in part. The Commission may reduce a fine after considering the factors in Section 106.265, Florida Statutes. If the Commission finds that the report was not timely filed and there were no unusual circumstances, the fine will be upheld.

If this is a **probable cause hearing**, the Commission will decide if there is probable cause to believe that the Respondent committed a violation of Florida's election laws. Respondent should be prepared to explain how the staff in its recommendation incorrectly applied the law to the facts of the case. *Respondent may not testify, call others to testify, or introduce any documentary or other evidence at the probable cause hearing*. The Commission will only decide whether Respondent should be *charged* with a violation and, before the Commission determines whether a violation has occurred or a fine should be imposed, Respondent will have an opportunity for another hearing at which evidence may be introduced.

If this is an **informal hearing**, it will be conducted pursuant Sections 120.569 and 120.57(2), Florida Statutes; Chapter 28 and Commission Rule 2B-1.004, Florida Administrative Code. At the hearing, the Commission will decide whether the Respondent committed the violation(s) charged in the Order of Probable Cause. The Respondent will be permitted to testify. However, the Respondent may not call witnesses to testify.

Respondent may argue why the established facts in the Staff Recommendation do not support the violations charged in the Order of Probable Cause. At Respondent's request, the Commission may determine whether Respondent's actions in the case were willful. The Respondent may also address the appropriateness of the recommended fine. If Respondent claims that his limited resources make him unable to pay the statutory fine, *he must provide the Commission with written proof of his financial resources* at the hearing. A financial affidavit form is available from the Commission Clerk.



Florida Elections Commission

107 West Gaines Street, Suite 224 Tallahassee, Florida 32399-1050 Telephone: (850) 922-4539 · Facsimile: (850) 921-0783 <u>FEC@myfloridalegal.com</u> · <u>www.fec.state.fl.us</u>



Confidential Commission Meeting August 25, 2020 at 8:30AM via Zoom

In order to participate in the confidential portion of the August 25, 2020, Florida Elections Commission meeting, please follow the instructions below:

Join Zoom Meeting

Click on the meeting link sent to your attention via email: https://zoom.us/j/91062518383?pwd=VkJ4Mi9kUUZXM1llZW5YcDF0bU1Sdz09

If you have difficulty launching the hyperlink, follow these steps.

- 1. Open your web browser and search ZOOM or enter www.zoom.us
- 2. Select "Join A Meeting" in the upper right corner of the website.
- 3. Enter the Meeting ID: 910 6251 8383 and click "Join".
- 4. Enter the Meeting Passcode: 673802 and click "Join".

For alternative audio participation:

- 1. Dial: 1 (929) 205-6099
- 2. Meeting ID: 910 6251 8383
- 3. Passcode: 673802

While this is a confidential meeting and advanced registration is not mandatory, we ask that if you plan to attend via Video Conference or Teleconference, that you notify our office in advance. This will give the Commission the opportunity to organize the agenda as efficiently as possible. It will be the goal of the Commission to hear cases in which parties are present, first, in order to reduce the standby time of the parties in attendance.

Please test your audio; microphone, speakers and webcam, in advance.

Those attendees who wish to speak before the Commission will need to appear by webcam and will be sworn in remotely.

Please be advised that the Commission will consider multiple cases, so you will be placed in a ZOOM breakout room until your case is considered.

If you have any questions, contact Commission staff at (850) 922-4539. Please provide the case number(s) when contacting our office.

Thank you,

Commission Staff

STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

In Re: Florida Voters Campaign PAC

TO: Michael Dobson, Chair 4005 Brandon Hill Drive Tallahassee, FL 32309

Case No.: FEC 19-291

Division of Elections 500 S Bronough Street, Room 316 Tallahassee, FL 32399

NOTICE OF HEARING (PROBABLE CAUSE DETERMINATION)

A hearing will be held in this case before the Florida Elections Commission on August 25, 2020. The Commission will begin at 8:30 am, EST, and will consider multiple cases that day.

Please note that because of COVID-19, this will be a virtual meeting conducted by remote video conference only. If you wish to attend the meeting, please notify the Commission office by email at fec@myfloridalegal.com no later than 5:00 pm EST, on Friday, August 7, 2020. After receiving your request, the Commission office will send you a set of participant instructions prior to the meeting, which will include login information and specific details regarding the time of your hearing. If you have questions, please contact Commission staff at (850) 922-4539.

Failure to appear in accordance with this notice will constitute a waiver of your right to participate in the hearing. Continuances will be granted only upon a showing of good cause.

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If you are an Appellant, and you have requested a hearing, you may attend the hearing, and you or your attorney will have 5 *minutes* to present your case to the Commission.

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Tim Vaccaro

Executive Director Florida Elections Commission July 28, 2020 Please refer to the information below for further instructions related to your particular hearing:

If this is a hearing to consider **an appeal from an automatic fine**, the Filing Officer has imposed a fine on you for your failure to file a campaign treasurer's report on the designated due date and, by filing an appeal, you have asked the Commission to consider either (1) that the report was in fact timely filed; or (2) that there were unusual circumstances that excused the failure to file the report timely. You are required to prove your case. If the Commission finds that the report was filed timely or that there were unusual circumstances that excused the failure, it may waive the fine, in whole or in part. The Commission may reduce a fine after considering the factors in Section 106.265, Florida Statutes. If the Commission finds that the report was not timely filed and there were no unusual circumstances, the fine will be upheld.

If this is a **probable cause hearing**, the Commission will decide if there is probable cause to believe that the Respondent committed a violation of Florida's election laws. Respondent should be prepared to explain how the staff in its recommendation incorrectly applied the law to the facts of the case. *Respondent may not testify, call others to testify, or introduce any documentary or other evidence at the probable cause hearing*. The Commission will only decide whether Respondent should be *charged* with a violation and, before the Commission determines whether a violation has occurred or a fine should be imposed, Respondent will have an opportunity for another hearing at which evidence may be introduced.

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Respondent may argue why the established facts in the Staff Recommendation do not support the violations charged in the Order of Probable Cause. At Respondent's request, the Commission may determine whether Respondent's actions in the case were willful. The Respondent may also address the appropriateness of the recommended fine. If Respondent claims that his limited resources make him unable to pay the statutory fine, *he must provide the Commission with written proof of his financial resources* at the hearing. A financial affidavit form is available from the Commission Clerk.

STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

In Re: Florida Voters Campaign PAC

Case No.: FEC 19-291

TO: Michael Dobson, Chair 4005 Brandon Hill Drive Tallahassee, FL 32309

Division of Elections 500 S Bronough Street, Room 316 Tallahassee, FL 32399

NOTICE OF CANCELLATION OF HEARING (PROBABLE CAUSE DETERMINATION)

You are hereby notified that the previously scheduled **hearing for March 24-25, 2020 is cancelled**. It is anticipated that your case will be heard at the next regularly scheduled meeting, which is currently set for May 2020. A Notice of Hearing will be mailed approximately 14 days prior to the hearing date indicating the exact date, time, and location.

Tim Vaccaro

Executive Director Florida Elections Commission March 12, 2020

STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

In Re: Florida Voters Campaign PAC

Case No.: FEC 19-291

TO: Michael Dobson, Chair 4005 Brandon Hill Drive Tallahassee, FL 32309

Division of Elections 500 S Bronough Street, Room 316 Tallahassee, FL 32399

NOTICE OF HEARING (PROBABLE CAUSE DETERMINATION)

A hearing will be held in this case before the Florida Elections Commission on, March 25, 2020 at 8:30 a.m., *or as soon thereafter as the parties can be heard*, at the following location: House Office Building, 404 South Monroe Street, Room 28-H, Tallahassee, Florida 32399. Due to heightened security access requirements, please bring only essential items into the building and plan to arrive early to allow for delays coming through security.

Failure to appear in accordance with this notice will constitute a waiver of your right to participate in the hearing. Continuances will be granted only upon a showing of good cause.

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If you are the Complainant, you may attend the hearing, but you will *not* be permitted to address the Commission. In addition, some cases (including those in which consent orders or recommendations for no probable cause are being considered) may be decided by an *en masse* vote and, unless the Respondent requests to be heard or the Commission requests that the case be considered separately on the day of the hearing, the case will *not* be individually heard.

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Tim Vaccaro

Executive Director Florida Elections Commission March 9, 2019 Please refer to the information below for further instructions related to your particular hearing:

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If this is a hearing to consider a **consent order after a determination of probable cause has been made**, the Commission will decide whether to accept or reject the consent order. If the Commission accepts the consent order, the case will be closed. If the Commission rejects the consent order or does not make a decision to accept or deny the consent order, the Respondent will be entitled to another hearing to determine if the Respondent committed the violation(s) alleged.

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STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

In Re: Florida Voters Campaign PAC

Case No.: FEC 19-291

STAFF RECOMMENDATION FOLLOWING INVESTIGATION

Pursuant to Section 106.25(4)(c), Florida Statutes, undersigned staff counsel files this written recommendation for disposition of the referral in this case recommending that there is **probable cause** to charge Respondent with violating **Section 106.07(7)**, Florida Statutes. Based upon a thorough review of the Report of Investigation submitted on December 20, 2019, the following facts and law support this staff recommendation:

1. On May 17, 2019, the Florida Elections Commission ("Commission") received a referral from the Department of State, Division of Elections ("Division"), alleging that Florida Voters Campaign PAC (Respondent") violated Chapter 106, Florida Statutes.

2. Respondent is a political committee registered with the Division. (ROI Exhibit 1)¹

3. On June 17, 2019, the Executive Director notified Respondent by mail that Commission staff would investigate the following statutory provision:

Section 106.07(7), Florida Statutes: As alleged in the complaint, Respondent, a political committee registered with the Division of Elections, failed to notify the filing officer on the prescribed reporting date that no report would be filed on that date because it had not received funds, made contributions, or expended reportable funds during the following reporting period:

• 2019 M2

4. On April 7, 2017, Kristi Reid Bronson², Chief, Bureau of Election Records, sent Respondent a letter acknowledging that the Division had received its Statement of Organization and Appointment of Campaign Treasurer and Designation of Campaign Depository for Florida Voters Campaign PAC. (ROI Exhibit 2, page 1)

5. The acknowledgment letter advised Respondent that all of the Division's publications and reporting forms were available on its website and directed Respondent to print out the *Political Committee Handbook, Calendar of Reporting Dates* as well as other relevant documents. (ROI Exhibit 2, page 3)

¹ The Report of Investigation is referred to herein as "ROI."

² Kristi Reid Bronson is now known as Kristi Reid Willis.

6. Pursuant to Section 106.07(7), Florida Statutes, in any reporting period during which a political committee has not received funds, made any contributions, or expended any reportable funds, the filing of the required report for that period is waived. However, the political committee is required to notify the filing officer in writing on the prescribed reporting date that no report is being filed on that date.

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7. The *Political Committee Handbook* references the statutory requirement regarding written notification and directs political committees to notify the Division by way of the Division's electronic filing system. (ROI Exhibit 3, page 4) The *Political Committee EFS User's Guide* shows the process through which to notify the Division. The user's guide instructs political committees to select the relevant reporting period and place a checkmark in a box titled "Waiver" to indicate the lack of reportable financial activity. (ROI Exhibit 4, page 3 and 4)

8. Respondent failed to notify the filing officer on the prescribed reporting date that no report would be filed for the following reporting period, as set forth in the table below. (ROI Exhibit 5, page 1, Date Filed column)

Report	Report Cover Period	Date Notification Due	Date Notification Filed	No. Days Late
2019 M2	2/1/19 - 2/28/19	3/11/19	6/11/19	92

RESPONDENT'S LETTER RESPONSE

9. In a letter dated June 10, 2019, Respondent wrote to the Commission regarding FEC 19-193, and later referenced the instant case, FEC 19-291. The letter stated that he "had technical difficulty logging into the system to log reports or make changes over a period of months." (ROI Exhibit 6, page 1, \P 3, line 1 and 2) To support this statement, Respondent attached an *Electronic Filing System (EFS) Credentials Request Form* with a date stamp indicating the Division received it on June 7, 2019. (ROI Exhibit 6, page 2, ROI Exhibit 7, Unique ID 65503)

10. While an online Campaign Documents Search confirms the above credentials request, this appears to be the only time such a written reset request is documented. (Attachment A, page 1) However, that singular request does not appear relevant to the instant case which relates to the notification due on March 11, 2019, for the 2019 M2 report.

11. It is also noteworthy that the Division's *History Notes* indicate there were several contacts Respondent had with the Division where he requested and received assistance pertaining to his reports. (ROI Exhibit 7)

RESPONDENT'S TELEPHONE RESPONSES

12. On December 18 and 19, 2019, Respondent had phone contact with investigative staff and stated he was not aware of any reports being filed against his PAC and seemed to attribute this to the fact that he is currently going through months of mail that he had been too busy to go through. (ROI Exhibit 8, Item 1, line 2, 3 and 4)

13. Respondent stated he only created the PAC to support amendment 4. (ROI Exhibit

8, Item 1, line 4 and 5) However, when Respondent, as Chairman, Secretary and Treasurer, filed his PAC's *Statement of Organization of Political Committee* (DS-DE 5) with the Division, he listed the area, scope and jurisdiction of the committee as "Candidates and Issues (To support or oppose statewide, multicounty, and local candidates and issues.)" (ROI Exhibit 9, page 1, No. 3)

14. Respondent said when the amendment passed, the PAC stopped collecting money or being active. (ROI Exhibit 8, Item1, line 5 and 6) However, an online Campaign Documents Search clearly shows that Respondent's PAC is still active with the Division, (Attachment A, page 1) and the Division's *History Notes* indicate there has been no contact with respondent since June 7, 2019. (Attachment B) Respondent admitted he should have closed the PAC, but added he was caught up in other activities and it slipped his mind. (ROI Exhibit 8, Item 1, line 6 and 7)

15. Investigations instructed Respondent to contact the Division for assistance and suggested he close the PC if it is no longer not active in order to avoid further penalties. Respondent stated he would contact the Division for assistance. (ROI Exhibit 8, Item 1, line 11, 12 and 13) As noted above in the *History Notes*, there has been no contact with Respondent since June 7, 2019. (Attachment B)

16. Respondent stated his campaign account is not open and has not been in over a year. To confirm this, investigations contacted the financial institution Respondent identified as his bank/depository; they were unable to locate any information on Respondent or the PAC. (ROI Exhibit 8, Item 2) Upon being advised of investigation's inability to locate the campaign account, Respondent stated he was unsure if a depository was ever opened, although he remembered a PayPal account, but did not know if it was associated with the PAC. (ROI Exhibit 8, Item 3, line 3 and 4)

17. Respondent also stated he does not even know how to get into the EFS system to file anything. (ROI Exhibit 8, Item 1, line 8 and 9) However, as noted earlier when Respondent indicated having difficulty getting into the EFS system, he requested and received credentials from the Division and subsequently filed seven reports on June 11, 2019. (ROI Exhibit 5, page 1, Date Filed column)

18. As to whether he ever received and read Chapter 106, Florida Statutes and the *Political Committee Handbook*, Respondent said he did not recall ever receiving or reviewing either. (ROI Exhibit 8, page 1 and 2, Item 3, line 4, 5 and 6) However, as noted previously, the Division acknowledged to Respondent it had received his PAC's Statement of Organization and Appointment of Campaign Treasurer and Designation of Campaign Depository on April 7, 2017, (ROI Exhibit 2, page 1) and advised him all publications and reporting forms of the Division were available on its website and directed him to print out the *Political Committee Handbook*, *Calendar of Reporting Dates* as well as other relevant documents. (ROI Exhibit 2, page 3)

19. "Probable Cause" is defined as reasonable grounds of suspicion supported by circumstances sufficiently strong to warrant a cautious person in the belief that the person has committed the offense charged. *Schmitt v. State*, 590 So. 2d 404, 409 (Fla. 1991). Probable cause exists where the facts and circumstances, of which an [investigator] has reasonably trustworthy information, are sufficient in themselves for a reasonable man to reach the conclusion that an

offense has been committed. Department of Highway Safety and Motor Vehicles v. Favino, 667 So. 2d 305, 309 (Fla. 1st DCA 1995).

20. The facts set forth above show that Respondent is a political committee registered with the Division. Respondent failed to notify the filing officer on the prescribed reporting date that no report would be filed for the following reporting period: 2019 M2.

Based upon these facts and circumstances, I recommend that the Commission find probable cause to charge Respondent with violating the following:

Count 1:

On or about March 11, 2019, Florida Voters Campaign PAC violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2019 M2 Report.

Respectfully submitted on February 10, 2020.

Michael T. McGuckin Assistant General Counsel

I reviewed this Staff Recommendation this day of February, 2020.

Vaccaro

Executive Director

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Campaign Documents Search

Forms are available in Adobe's Acrobat PDF format for viewing or printing at your site. Accessing documents in PDF format requires use of <u>Adobe's Acrobat Reader</u>, which may be installed free of charge.

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Florida Voters Campaign P		PAC	01/06/20	Fail to File Letter	PDF	
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Florida Voters Campaign P		PAC	11/15/19	Fail to File Letter	PDF	
Florida Voters Campaign P		PAC	11/04/19	Fail to File Letter	PDF	
Florida Voters Campaign P/		PAC	10/21/19	Fail to File Letter	PDF	
Florida Voters Campaign PA	2010000	PAC	10/11/19	Fail to File Letter	PDF	
Florida Voters Campaign P		PAC	10/01/19	Fail to File Letter	PDF	
Florida Voters Campaign PA		PAC	09/23/19	Fail to File Letter	PDE	
Florida Voters Campaign PA		PAC	09/11/19	Fail to File Letter	PDF	
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Florida Voters Campaign PA	AC I	PAC	08/26/19	Fall to File Letter	PDE	
Florida Voters Campaign PA	AC I	PAC	08/13/19	Fail to File Letter	PDF	
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Florida Voters Campaign PA	AC 1	PAC	07/30/19	Fail to File Letter	PDF	
Florida Voters Campaign PA	AC I	PAC	07/11/19	Fail to File Letter	PDE	n 10
Florida Voters Campaign PA	AC	PAC	07/01/19	Late Report Letter	PDF	
Florida Voters Campaign PA	AC I	PAC	06/07/19	Pin/Password Reset Request	PDF	
Florida Voters Campaign PA	AC I	PAC	06/03/19	Fail to File Letter	PDE	
Florida Voters Campaign P		PAC	05/22/19	Fail to File Letter	PDF	
Florida Voters Campaign P/		PAC	05/13/19	Fail to File Letter	PDF	•
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Florida Voters Campaign P		PAC	04/29/19	Fail to File Letter	PDE	1
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https://dos.elections.myflorida.com/campaign-docs/?account=69745

Campaign Documents - Florida Department of State

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Florida Voters Campaign F. PAC	03/13/19	Fail to File Letter	PDF	
Florida Voters Campaign PAC PAC	03/01/19	Late Report Letter	PDF	
Florida Voters Campaign PAC PAC	02/12/19	Fail to File Letter	PDF	
Florida Voters Campaign PAC PAC	01/11/19	Fail to File Letter	PDE	
Florida Voters Campaign PAC PAC	01/03/19	Audit Letter	PDF	
Florida Voters Campaign PAC PAC	12/17/18	Audit Letter	PDE	
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Florida Voters Campaign PAC PAC	12/05/18	Audit Letter	PDF	
Florida Voters Campaign PAC PAC	11/20/18	Fail to File Letter	PDF	
Florida Voters Campaign PAC PAC	11/19/18	Fail to File Letter	PDF	
Florida Voters Campaign PAC PAC	11/09/18	Audit Letter	PDF	
Florida Voters Campaign PAC PAC	11/03/18	Fail to File Letter	PDF	
Florida Voters Campaign PAC PAC	11/02/18	Fail to File Letter	PDE	
Florida Voters Campaign PAC PAC	10/31/18	Fail to File Letter	PDF	
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Florida Voters Campaign PAC PAC	10/29/18	Fail to File Letter	PDF	
Florida Voters Campaign PAC PAC	10/29/18	Fail to File Letter	PDF	
Florida Voters Campaign PAC PAC	10/29/18	Fail to File Letter	PDF	
Florida Voters Campaign PAC PAC	10/22/18	Late Report Letter	PDE	
Florida Voters Campaign PAC PAC	10/22/18	Fail to File Letter	PDF	
Florida Voters Campaign PAC PAC	10/22/18	Fail to File Letter	PDF	
Florida Voters Campaign PAC PAC	10/08/18	Fail to File Letter	PDF	
Florida Voters Campaign PAC PAC	10/01/18	Fail to File Letter	. PDF	
Florida Voters Campaign PAC PAC	09/26/18	Late Report Letter	PDF	
Florida Voters Campaign PAC PAC	09/17/18	Fail to File Letter	PDF	
Florida Voters Campaign PAC PAC	09/17/18	Late Report Letter	PDF	
Florida Voters Campaign PAC PAC	09/17/18	Late Report Letter	PDE	
Florida Voters Campaign PAC PAC	09/10/18	Audit Letter	PDE	
Florida Voters Campaign PAC PAC	09/05/18	Late Report Letter	PDF	
Florida Voters Campaign PAC PAC	09/05/18	Late Report Letter	PDF	
Florida Voters Campaign PAC PAC	08/22/18	Late Report Letter	PDF	
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Florida Voters Campaign PAC PAC	07/31/18	Late Report Letter	PDF	
Florida Voters Campaign PAC PAC	07/10/18	Late Report Letter	PDF	
Florida Voters Campaign PAC PAC	07/06/18	Late Report Letter	PDF	
Florida Voters Campaign PAC PAC	06/05/18	Late Report Letter	PDF	
Florida Voters Campaign PAC PAC	05/11/18	Late Report Letter	PDF	
Florida Voters Campaign PAC PAC	04/20/18	Audit Letter	PDF	
Florida Voters Campaign PAC PAC	03/27/18	Late Report Letter	PDE	•
Florida Voters Campaign PAC PAC	03/13/18	Fail to File Letter	PDF	
Florida Voters Campaign PAC PAC	02/26/18	Late Report Letter	PDF	
Florida Voters Campaign PAC PAC	02/13/18	Fail to File Letter	PDF	
Florida Voters Campaign PAC PAC	12/19/17	Late Report Letter	PDF	
Florida Voters Campaign PAC PAC	12/12/17	Fail to File Letter	PDF	
Florida Voters Campaign PAC PAC	12/11/17	Late Report Letter	PDE	
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Florida Voters Campaign PAC PAC	08/16/17	Audit Letter	PDE	pg J
Florida Voters Campaign PAC PAC	04/07/17	Acknowledgment Letter	PDF	
Florida Voters Campaign PAC PAC	04/06/17	PAC Statement of Organization	PDE	
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https://dos.elections.myflorida.com/campaign-docs/?account=69745

Campaign Documents - Florida Department of State

Florida Voters Campaign E PAC	04/06/17	PAC Appt of Campaign Gurer	PDF
Florida Voters Campaign PAC PAC	04/06/17	Registered Agent Appointment	PDF PDF

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ATTACHMENT A page 3 g 3

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HISTORY NOTES Florida Voters Campaign PAC - 69745

Unique ID	Date Recorded	Last Edited Date	Orginally Recorded By
65503	6/7/2019 11:16:00 AM		ZJSantos
RE: Credential Request F	orm		
I released the credentials	to Mr. Dobson.		
63672	2/26/2019 8:31:00 AM		dlhoward
	e contact with Michael Dobson in refe ow to delete the G1 Contribution trans	action that has now been reported	
63593	2/22/2019 9:09:00 AM		dlhoward
	o make contact with Michael Dobson I had to leave a voice message requ	esting a call back. DLH	nt on December 12, 2018. I
63039	1/30/2019 11:19:00 AM		dihoward
01/30/2019 - I made conta Report. He incated that he this report. DLH.	act with Michael Dobson and gve him a would give me a call no later than to	directions on how to correct the En morrow, January 31, 2019 to confir	ror in the G1 (seq.#1) Audit m his corrective actions to
62672	1/14/2019 10:32:00 AM		dlhoward
	nake contact with Michael Dobson in or, I Left a voice message. DLH	reference to the Final Notice sent of	on December 12, 2018.
58274	5/7/2018 4:50:00 PM		dsbrown
RE: Audit M3			
Mr. Dobson called. I assis	sted him in amending the M3 report.	His report should now be complete.	-
58245	5/2/2018 9:09:00 AM	(5 .)	jcsoria
Re: Report Error			
tried contacting Mr. Dobs	on		
54009	5/10/2017 12:22:00 PM		SLBagley
RE: 2017 M4			
	Michael, who was filing his first repor re to find the handbook when he said		

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ATTACHMENT B

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FLORIDA ELECTIONS COMMISSION

Report of Investigation for Failure to Notify Filing Officer

Case Number: FEC 19-291

Section 106.07(7), Florida Statutes, failure of a political committee that did not receive any contributions or make any expenditures during a reporting period to notify timely the filing officer, in writing, that no report is being filed

Respondent: Florida Voters Campaign PAC

1.

Complainant: Division of Elections

Respondent Type:

Candidate

Political Committee

I. Preliminary Information:

1. An appointment of Campaign Treasurer and Designation of Campaign Depository (DS-DE 6) was filed on April 6, 2017. (Ex. 1)

2. An acknowledgement letter was mailed to the address provided on Respondent's DS-DE 6 on April 7, 2017 advising Respondent that all of the Division's publications and reporting forms are available on their website, including Chapter 106, Florida Statutes, the *Political Committee Handbook*, and the Calendar of Reporting Dates. (Ex. 2)

3. The acknowledgement letter also states, "An online instruction guide is available to you on the EFS to assist with navigation, data entry, and submission of reports" and provides the telephone number for the Division's EFS Help Desk.

4. The Political Committee Handbook, discusses filing a waiver when there is no activity to disclose on page 26. (Ex. 3)

5. Pages 12, 13, 45, and 46 of the *Political Committee EFS User's Guide* discuss how to notify the Division on the prescribed reporting date that no report will be filed using the EFS. Specifically, page 13 instructs the user to click the box next to "waiver" if there is no activity to disclose. (Ex. 4)

6. In a telephone interview on April 2, 2014, Kristi Reid-Bronson clarified that once the waiver box is chosen and a new report is opened as shown on page 12, the only available option on the report summary screen will be "Go To File Report" as shown on page 13. Choosing "Go To File Report" will take the user directly to the screens where the chairman/treasurer PINS are entered as shown on pages 45 and 46.

II. Alleged Violation of Section 106.07(7), Florida Statutes:

7. Respondent's filing history reflects the untimely filed notifications summarized below. (Ex. 5)

Report	Report Cover Period	Date Notification Due	Date Notification Filed	No. of Days Late
2019 M2	2/1/19 – 2/28/19	3/11/19	6/11/19	92

8. Respondent's chairman provided a written response dated June 10, 2019, in which he stated, "As explained and discussed in communications with Molly Donovan of your office, we have had technical difficulty logging into the system to log reports or make changes over a period of months. I also advised that this would require that we physically go into the Florida Division of Elections Office at the Gray Bldg to request info needed to access the system.....We apologize for our inability to get this done earlier. We hope that this satisfy this case. While it has been a year since the Florida Voters Campaign has received any donations whatsoever, we now better understand our duty to file timely reports nonetheless. Thank you for the work that you do". (Ex. 6)

9. FEC staff reviewed notes from the Division of Elections regarding Respondent's interactions with them. These notes reflect that Respondent's chairman was contacted by the Division of Elections in 2019 on several occasions to assist in amending previously filed reports. These records also reflect that Respondent's chairman requested new credentials (pin number, password, and user ID number) in order to file the PAC's reports on June 7, 2019, after this referral was filed with the FEC. There is no record prior to that date of Respondent informing the Division of an issue with their EFS access or requesting new EFS credentials. (Ex. 7)

10. Respondent's chairman was interviewed by telephone on December 18, 2019, in which he stated that he was unaware of any reports being filed against his PAC. He told me that he is currently going through months of mail that he has been too busy to go through. Respondent stated that the PAC was only created to support amendment 4. He stated that once that amendment passed, the PAC stopped collecting any monies or being active. He stated that he should have closed it then, but he got caught up in other activities and it slipped his mind. He advised me that his campaign depository is not open and has not been open in over a year. He also advised me that he does not even know how to get into the EFS system to file anything. (Ex. 8)

<u>_</u>*

III. FEC History:

11. Respondent has not had any prior cases before the Commission.

Conclusion:

12. Respondent stated during the December 19, 2019 telephone interview that he did not read Chapter 106, Florida Statutes or the *Political Committee Handbook*. Respondent filed his statement of Organization form on April 6, 2017. (Ex. 9)

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13. The Investigative Phone Log is included with this report. (Ex. 8)

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SIGNATURE OF INVESTIGATOR;	1 kket	Date: 12/6	20/19

FLORIDA ELECTIONS COMMISSION REPORT OF INVESTIGATION Florida Voters Campaign, Inc -- FEC 19-291

	LIST OF EXHIBITS
Exhibits #s	Description of Exhibits
Exhibit 1	Respondent's DS-DE 6 Form
Exhibit 2	Acknowledgement Letter
Exhibit 3	Relevant pages from the Political Committee Handbook
Exhibit 4	Relevant pages from the Political Committee EFS User's Guide
Exhibit 5	Respondent's Filing History
Exhibit 6	Respondent's Response Letter
Exhibit 7	Notes from the Division of Elections
Exhibit 8	Phone Log
Exhibit 9	Statement of Organization

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APPOINTMENT OF CAMPAIGN TREASURER AND DESIGNATION OF CAMPAIGN DEPOSITORY FOR POLITICAL COMMITTEES (Sections 106.011(1) and 106.021(1), F.S.)	17 APR -6 PH 1: 39
CHECK APPROPRIATE BOX:	OFFICE USE ONLY
7. Street Address 4005 Brandun Hill Dr	2. Telephone 2. Telephone 18501 241 - 5896 3. Telephone (optional) (850) 241 - 586 DriVe, Tallalasse, F1 32309 <i>ive Tallalasse, F1 32309</i> mary Depository Secondary Depository
9. Name of Bank	10. Street Address
Mells Fargu 11. City Tallahassee, Florida 14. Signature of Chairman X Munich Australian	3529 Thomasuille Red 12 State 13. Zip Code Florida 32309 15. Name of Chairman (Print or Type) Michael Dobson
	cceptance of Appointment
1. <u>Michael DobSon</u> (Please Print or Type) treasurer or deputy treasurer for <u>Flurida</u>	do hereby accept the appointment as <u>Viters</u> Cumpaign PAC (Committee or Organization)
	AVE READ THE FOREGOING CAMPAIGN TREASURER'S THAT THE FACTS STATED ARE TRUE.
<u>April S, 2017</u> X Date <u>X</u> DS-DE 6 (Rev. 7/10)	Signature of Campaign Treasurer or Deputy Treasurer
EXHIBIT	

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EXHIBI	1.1
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FLORIDA DEPARTMENT Of STATE

RICK SCOTT Governor KEN DETZNER Secretary of State

April 7, 2017

Michael Dobson, Chairperson Florida Voters Campaign PAC 4005 Brandon Hill Drive Tallahassee, Florida 32309

Dear Mr. Dobson:

This will acknowledge receipt of the Statement of Organization and Appointment of Campaign Treasurer and Designation of Campaign Depository for Florida Voters Campaign PAC, which were placed on file in our office on April 6, 2017. This information appears to comply with the requirements of Section 106.03, Florida Statutes, and the name of this organization has been placed on our active committee list as a political committee.

Campaign Treasurer's Reports

Your first campaign treasurer's report will be due on <u>May 10, 2017</u>. The report will cover the period of April 1-30, 2017 (M4). All political committees that file reports with the Division of Elections are required to file by means of the Division's Electronic Filing System (EFS).

Credentials and Sign-ons

Below is the web address to access the EFS and the committee's user identification number. The enclosed sealed envelope contains the committee's initial password. Once you have logged in using the initial password, you will be immediately prompted to change it to a confidential sign-on. The chairperson, campaign treasurer, and deputy treasurers are responsible for protecting this password from disclosure and are responsible for all filings using these credentials, unless the Division is notified that your credentials have been compromised.

EFS Website Address: https://efs.dos.state.fl.us Identification Number: 69745

Division of Elections R.A. Gray Building, Suite 316 • 500 South Bronough Street • Tallahassee, Florida 32399 850.245.6240 • 850.245.6260 (Fax) dos.myflorida.com/elections/



Michael Dobson, Chairperson April 7, 2017 Page Two

Pin Numbers

Pin numbers are confidential secure credentials that allow you to submit reports and update information. The enclosed sealed envelopes contain your confidential pin numbers.

Each political committee chairperson is required to provide the Division of Elections with confidential personal information that may be used to allow access in the event that the password is forgotten or lost. When you enter the campaign account screen, there will be a drop down box where you pick a question (such as *What is your mother 's maiden name?*) and supply an answer. All passwords and answers to questions are stored as encrypted data and cannot be viewed by Division staff and given out over the phone. Please notify the Division if your credentials have been compromised.

Timely Filing

All reports must be completed and filed through the EFS not later than midnight, Eastern Standard Time, of the due date. Reports not filed by midnight, Eastern Standard Time, of the due date are late filed and subject to the penalties in Section 106.07(8), Florida Statutes. In the event that the EFS is inoperable on the due date, the report will be accepted as timely filed if filed no later than midnight, Eastern Standard Time, of the first business day the EFS becomes operable. No fine will be levied during the period the EFS was inoperable.

Any political committee failing to file a report on the designated due date is subject to a fine of \$50 per day for the first 3 days and, thereafter, \$500 per day for each day, not to exceed 25% of the total receipts or expenditures, whichever is greater, for the period covered by the late report. However, for the reports immediately preceding each primary and general election, the fine shall be \$500 per day, not to exceed 25% of the total receipts or expenditures, whichever is greater, for the period covered by the late report.

Electronic Receipts

The person submitting the report on the EFS will be issued an electronic receipt indicating and verifying the report was filed. Each campaign treasurer's report filed by means of the EFS is considered to be under oath by the chairperson and campaign treasurer and such persons are subject to the provisions of Section 106.07(5), Florida Statutes.

EXHIBIT \measuredangle

Michael Dobson, Chairperson April 7, 2017 Page Three

Instructions and Assistance

An online instruction guide is available to you on the EFS to assist with navigation, data entry, and submission of reports. The Division of Elections will also provide assistance to all users by contacting the EFS Help Desk at (850) 245-6280.

All of the Division's publications and reporting forms are available on the Division of Elections' website at <u>http://dos.myflorida.com/elections/</u>. It is your responsibility to read, understand, and follow the requirements of Florida's election laws. Therefore, please print a copy of the following documents: Chapter 106, Florida Statutes, *Political Committee Handbook*, *Calendar of Reporting Dates*, and Rule 1S-2.017, Florida Administrative Code.

Please let me know if you need additional information.

Sincerely,

Ant Ruid &

Kristi Reid Bronson, Chief Bureau of Election Records

KRB/zjs

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Enclosures

2016 Political Committee Handbook

Florida Department of State Division of Elections R. A. Gray Building, Room 316 500 South Bronough Street Tallahassee, FL 32399-0250 850.245.6240

(Rev. 01/27/2016)

Political Committee Handbook

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i EXHIBIT 3 (2074)

Political Committee Handbook

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3(30-14) EXHIBIT_

Unless the electronic filing requirements of Section 106.0705, Florida Statutes, apply, reports shall be filed no later than 5 p.m. of the day designated. A report postmarked by the U.S. Postal Service no later than midnight of the day designated is deemed timely filed. A report received by the filing officer within 5 days after the designated due date that was delivered by the U.S. Postal Service is deemed timely filed unless it has a postmark indicating the report was mailed after the designated due date. A certificate of mailing obtained from and dated by the U.S. Postal Service at the time of mailing or a receipt from an established courier company, which bears a date on or before the date on which the report is due, is proof of mailing in a timely manner. Reports filed with the Division through the Electronic Filing System (EFS) are due no later than midnight, Eastern Time, of the due date. (See Chapter 12, Electronic Filing of Campaign Reports.)

(Sections <u>106.07</u>, <u>106.0705</u> and 106.141, F.S.)

Penalty for Late Filing

Any political committee failing to file a report on the designated due date shall be subject to a fine of \$50 per day for the first three days late and, thereafter, \$500 per day for each late day, not to exceed 25 percent of the total receipts or expenditures, whichever is greater, for the period covered by the late report. However, for the reports due immediately prior to the primary and general elections, the fine shall be \$500 per day for each late day, not to exceed 25 percent of the total receipts or expenditures, whichever is greater, for the period covered by the late report.

(Section 106.07(8), F.S.)

Notice of No Activity

When there has been no reportable activity in the campaign account during a reporting period (no funds expended or received) the filing of the report is waived. The political committee shall notify the filing officer in writing on or before the prescribed reporting date that no report is being filed on that date. The next report filed must specify that the report covers the entire period between the last submitted report and the report being filed.

(Section 106.07, F.S.)

<u>(A notice of no activity</u> filed with the Division must be filed electronically using the Division's <u>electronic filing system</u>.

(Section 106.0705, F.S.)

Special Election Reports

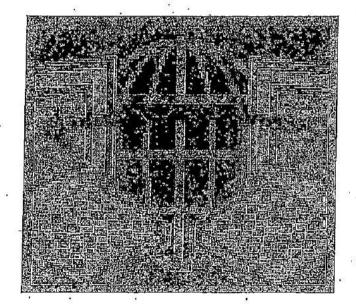
When a special election is called to fill a vacancy in office, all political committees making contributions or expenditures to influence the results of the special election shall file campaign treasurers' reports with the filing officer on the dates set by the Department of State pursuant to Section 100.111, F.S.

When an election is called for an issue to appear on the ballot at a time when no candidates are scheduled to appear on the ballot, all political committees making contributions or expenditures in support of or in opposition to such issue shall file reports on the 18th and 4th days prior to such election.

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Department of State Division of Elections

Political Committee EFS User's Guide



Florida Department of State Division of Elections R.A. Gray Building, Room 316 500 S Bronough Street Tallahassee, FL 32399-0250

EFS HELP LINE: 850-245-6280

January 2011

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Rule 1S-2.017, F.A.C.

DS-DE 110B (eff. 01/11)

Index

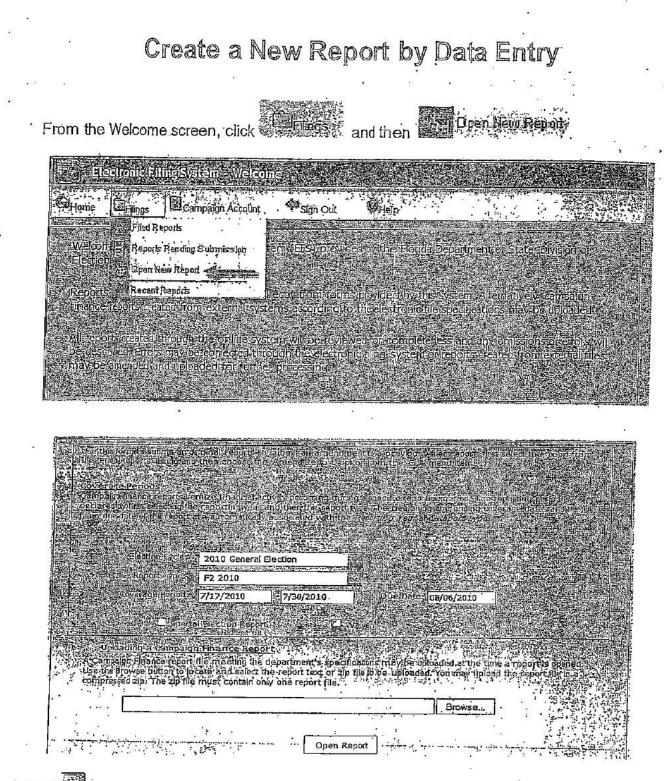
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Introduction	
Access the EFS	
Passwords and PINs	3
Set a Password Recovery Question	
Recover Password	
Change a Password	
Set a PIN Recovery Question	
Recover a PIN	
Change a PIN	
Create a New Report by Data Entry	
Enter Contributions	14
Enter Expenditures	
Enter Other Distributions	20
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Create a New Report by File Upload	
Review Data for Errors	
Create an Error Filter	
File the Report	
Print a File Receipt	
Make Changes to the Report after Chairperson Enters PIN	
Access a Pending Report	
Amend a Report	
Print a Report	

EXHIBIT 4(20f6)



Click arrow next to Election Cycle. Scroll to the cycle associated with the report you are entering.

Click arrow next to Report Type select report type corresponding to the correct cover period and due date.

The Cover Period dates will automatically fill in based on the Calendar of Election and Reporting Dates. 4(3076

12

The Due Date will automatically fill in based on the Calendar of Election and Reporting Dates.

If this report is for a special election, click the box next to Special Election Report. (If no special elections are scheduled this option will not be available.)

*****NOTE*****

If this report is a waiver of report (no activity), click the 📰 box next to Waiver.

Equilibre C/28 2019 Carjeral Electron	
Certain 1978 . 172 2018 .	
Coverage Second: 7/17/2010	30/2019 OCe Lake Job/06/2010
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Click Open Report at the bottom of the screen. A Report Detail screen (view only) will appear. This screen will not indicate any activity until individual detail data is entered, saved and a review is performed.

Report: 2010 - 64-27 2010 General Election			6/2010-10/28/291	Due: 10/2	
		omplete Detail Records	al and a second s		
Tepates	Review Status	Reviewed	100 C		
Status Data Entry	LastReview				s in f
					a de a de la calendaria de Calendaria de la calendaria
# of Transactions: 0 Review	Recalculate	Go To File Report	Append File	Delete Report	Save
Contributions Total Amount		Experiditures	Total Amount		
the first that the table of the second second	a)	/ Monetary:		0.00	
toans 0	.00	Ale Transfers to Off Acct		0.00	
The State of the S	.00	Total Monetary		0.00	
the search and the state of the second state of the second state of the second state of the second state of the		Other Distributions:		0.00	
		•••••••••••••••••••••••••••••••••••••••		and Charlesters	5) V 3
Review Messages					12
				A BANGAL SE	1. 1. 4.
Created: 10/26/2010 11:41:25	AM By: 50552	Revised:	10/26/2010 11:4	1:25 AM BY ST	
A 2					
		(1) 0.1	Ĩ.	Sec.	(4)
E	khibit 4	140761	1		
			· 1		

File the Report

If the Review Status is <u>Updated Detail – Needs Review</u> the report has not been reviewed since the last update. (See page 39 for instructions on how to submit the report to the system for review.)

If the status of the report is <u>Complete</u> <u>Detail Records</u>, you are ready to file the report.

Report 2010 - F3-25. 2010 Gener	Election Covers	9/7/2010 6/19/2010 575 52 DV-18/20/2010 555 57
≥⊡onednese ⊡kraveras	Complete Detail Rec	ords
-FielDate	Rever Status: Reviewed	
Selici Data Entry	at last Review? 3/19/2010 3:56:42 F	M F A A A A A A A A A A A A A A A A A A
atjanscore 1	eview 📉 Recalculate 🔛 Go Fo File Repu	T Appenditle Delete Report Save the
Contributions Anodal	0.00	AN TRACTOLO
	0,00 The state of	FACE 11 - CX42453000
1. Contractor Monetary in Pro-	1. 0.00	201 (11 (11 (11 (11 (11 (11 (11 (11 (11 (
	0.00 L A C Quar Strib	no <u>rood</u>
A Review		
	01.35 P0	4/19/2010.3 St: 12/241 - 542 - 642 - 50252 - 433

Click on Go to File Report

The chairperson enters his or her PIN, and then selects

Report Approved

Step 2: Select the 'Report Approved' button.

 Report: 2010 + F3 # 25
 Coverage Period: 8/7/2010-8/19/2010
 Due : 8/20/2010.

 Review Status:
 Reviewed
 Coverage Period: 8/7/2010-8/19/2010

 PIN for Candidate/Chairperson:
 Report Approved
 Report Approved

 EXHIBIT
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 4

If there is more than one treasurer, click on the drop down and select the treasurer that is filing the report.

The treasurer enters his PIN and then clicks

 Cepaid 201
 Edwinder Lenoil 36//2040 8/ 9/241
 Die 86.002000

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<u>IMPORTANT NOTE</u>: If changes need to be made <u>after</u> a chairperson PIN is entered, the treasurer must <u>undo</u> the chairperson PIN validation before the system will allow changes. See page 49 for instructions.

EXHIBIT



Name:

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Florida Department of State - Division of Elections

Florida Election System Reports Candidate/Committee Lockup

Committee Name: Florida Voters Campaign PAC

Account: 69745

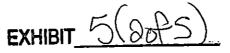
	1
Acct: 69745	
ype: Committee	e 🗸

A	Acco	unt: 69745			•			
Date Due 1	Гуре	Date Filed	Status	Days Late	Fine Assessed	Appealed	Amount Fined	Amount Paid
12/10/2019	M11		SNT	0	\$0.00		\$0.00	\$0.00
11/12/2019	M10		SNT	0	\$0.00		\$0.00	\$0.00
10/10/2019	M9		FEC	0	\$0.00		\$0.00	\$0.00
9/10/2019	M8		FEC	0	\$0.00		\$0.00	\$0.00
8/12/2019	M7		FEC	0	\$0.00		\$0.00	\$0.00
7/10/2019	M6		FEC	0	\$0.00		\$0.00	\$0.00
6/10/2019	M5	6/1 1/201 9	CLO	1	\$0.00		\$0.00	\$0.00
5/16/2019	SG1	6/11/2019	CLO	26	\$0.00		\$0.00	\$0.00
5/10/2019	M4	6/11/2019	FEC	32	\$0.00		\$0.00	\$0.00
4/10/2019	MЗ	6/11/2019	FEC	62	\$0.00		\$0.00	\$0.00
4/5/2019	SP2	6/11/2019	CLO	67	\$0.00	i.	\$0.00	\$0.00
3/11/2019	SP1	6/11/2019	CLO	92	\$0.00		\$0.00	\$0.00
3/11/2019	M2	6/11/2019	CLO	92	\$0.00		\$0.00	\$0.00
2/11/2019	M1	2/12/2019	CLO	1	\$0.00		\$0.00	\$0.00
1/10/2019	M12	1/15/2019	FEC	5	\$0.00		\$0.00	\$0.00
12/10/2018	M11	12/12/2018	FEC	2	\$0.00		\$0.00	\$0.00
11/2/2018	G7	12/12/2018	FEC	40	\$0.00		\$0.00	\$0.00
11/1/2018	D6	12/12/2018	FEC	41	\$0.00		\$0.00	\$0.00
10/31/2018	D5	10/31/2018						
10/30/2018	D4	10/31/2018	FEC	1	\$0.00		\$0.00	\$0.00
10/29/2018	D3	10/31/2018	FEC	2	\$0.00		\$0.00	\$0.00
10/28/2018	D2	10/31/2018	FEC	3	\$0.00		\$0.00	\$0.00
10/27/2018	D1	10/31/2018	FEC	4	\$0.00		\$0.00	\$0.00
10/26/2018	G6	10/31/2018	FEC	5	\$0.00		\$0.00	\$0.00
10/25/2018	G4	10/31/2018	FEC	6	\$0.00		\$0.00	\$0.00
10/19/2018	G5	10/31/2018	FEC	12	\$0.00		\$0.00	\$0.00
10/5/2018	G3	10/31/2018	FEC	26	\$0.00		\$0.00	\$0.00
9/28/2018 (G2A	10/5/2018	FEC	7	\$0.00		\$0.00	\$0.00
9/21/2018	G2	9/21/2018						
9/14/2018	G1A	9/18/2018	FEC	4	\$0.00		\$0.00	\$0.00
9/7/2018	G1	8/31/2018	an estimate of the					
		9/1/2018	FEC	1	\$0.00		\$0.00	\$0.00
8/24/2018	P7	8/26/2018	FEC	2	\$0.00		\$0.00	\$0.00
		8/18/2018	FEC	1	\$0.00		\$0.00	\$0.00
		8/11/2018	FEC	1	\$0.00		\$0.00	\$0.00
		8/4/2018	FEC	1	\$0.00		\$0.00	\$0.00
		7/28/2018	FEC	1	\$0.00		\$0.00	\$0.00
		7/21/2018	FEC	1	\$0.00		\$0.00	\$0.00
		7/13/2018	1999/1417		12/3/12/3		1217-12121	10101-00105
		7/8/2018	FEC	2	\$0.00		\$0.00	\$0.00
		6/30/2018	FEC	1	\$0.00		\$0.00	\$0.00
		6/11/2018						
		6/11/2019						
		6/11/2019						
		6/11/2019	CLO	397	\$0.00		\$0.00	\$0.00
7. EY	111	BIT	5 ()	DH	5)			
E)		<u>حـــــ</u> ۱۰						

https://doesecure.dos.state.fl.us/fec/FilingHistory.Asp?AcctNum=69745&cboElection=& ... 12/19/2019

					= - · ^		
5/10/2018	M4	5/22/2018	FEC	12	\$0.00	\$0.00	\$0.00
4/27/2018	SG2	6/11/2019	CLO	410	\$0.00	\$0.00	\$0.00
4/27/2018	SG2	6/11/2019	CLO	410	\$0.00	\$0.00	\$0.00
4/10/2018	MЗ	4/10/2018					
4/6/2018	SG2	6/11/2019	CLO	431	\$0.00	\$0.00	\$0.00
3/27/2018	SG1	6/11/2019	CLO	441	\$0.00	\$0.00	\$0.00
3/27/2018	SG1	6/11/2019	CLO	441	\$0.00	\$0.00	\$0.00
3/12/2018	M2	3/20/2018	FEC	8	\$0.00	\$0.00	\$0.00
3/9/2018	SG1	6/11/2019	CLO	459	\$0.00	\$0.00	\$0.00
2/16/2018	SP2	6/11/2019	CLO	480	\$0.00	\$0.00	\$0.00
2/16/2018	SP2	6/11/2019	CLO	480	\$0.00	\$0.00	\$0.00
2/12/2018	'M1	2/16/2018	FEC	4	\$0.00	\$0.00	\$0.00
2/9/2018	SG2	6/11/2019	CLO	487	\$0.00	\$0.00	\$0.00
1/26/2018	SP2	6/11/2019	CLO	501	\$0.00	\$0.00	\$0.00
1/10/2018	SG1	1/15/2019	CLO	370	\$0.00	\$0.00	\$0.00
1/10/2018	M12	1/10/2018					
1/2/2018	SP1	6/11/2019	CLO	525	\$0 .00	\$0.00	\$0.00
1/2/2018	SP1	6/11/2019	CLO	525	\$0.00	\$0.00	\$0.00
12/19/2017	SP1	6/11/2019	CLO	539	\$0.00	\$0.00	\$0.00
12/11/2017	M11	12/18/2017	FEC	7	\$0.00	\$0.00	\$0.00
11/13/2017	M10	11/14/2017	FEC	1	\$0.00	\$0.00	\$0.00
10/10/2017	M9	10/11/2017	FEC	1	\$0.00	\$0.00	\$0.00
9/22/2017	M8	9/12/2017					
8/10/2017	M7	8/10/2017					
7/10/2017	M6	7/10/2017					
6/12/2017	M5	6/12/2017					
5/10/2017	M4	5/10/2017					
0/10/2017	IAI+	GETUIZUTE					

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Campaign Finance Activity - Division of Elections - Florida Department of State



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Florida Department of State **Division of Elections**

Florida Voters Campaign PAC

Campaign Finance Activity

Note: The information presented below was obtained from the Committee's/Candidate's Campaign Treasurer's Report filed with the Division of Elections. <u>About the Campaign Finance Data Base</u>. If all contributions for a reporting period are less than 1 dollar Then they may not be displayed.

		C	ontributions				
	Filing Period	Monetary	Loans	InKind	Expend	Other	Transfers
W	04/01/2017 - 04/30/2017	0.00	0.00	0.00	0.00	0.00	0.00
0	05/01/2017 - 05/31/2017	0.00	0.00	2,000.00	0.00	0.00	0.00
0	06/01/2017 - 06/30/2017	0.00	0.00	1,500.00	0.00	0.00	0.00
0	07/01/2017 - 07/31/2017	25.00	0.00	0.00	0.00	0.00	0.00
W	08/01/2017 - 08/31/2017	0.00	0.00	0.00	0.00	0.00	0.00
W	09/01/2017 - 09/30/2017	0.00	0.00	0.00	0.00	0.00	0.00
W	10/01/2017 - 10/31/2017	0.00	0.00	0.00	0.00	0.00	0.00
W	11/01/2017 - 11/30/2017	0.00	0.00	0.00	0.00	0.00	0.00
W	11/06/2017 - 12/14/2017	0.00	0.00	0.00	0.00	0.00	0.00
W	11/09/2017 - 12/28/2017	0.00	0.00	0.00	0.00	0.00	0.00
W	11/28/2017 - 12/28/2017	0.00	0.00	0.00	0.00	0.00	0.00
W	12/01/2017 - 12/31/2017	0,00	0.00	0.00	0.00	0.00	0.00
W	12/01/2017 - 01/04/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	12/15/2017 - 01/25/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	01/01/2018 - 01/31/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	01/05/2018 - 02/08/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	12/29/2017 - 02/15/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	12/29/2017 - 02/15/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	02/01/2018 - 02/28/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	01/26/2018 - 03/02/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	02/16/2018 - 03/22/2018	0.00	0.00	0.00	0.00	0.00	0.00
Ŵ	02/16/2018 - 03/22/2018	0.00	0.00	0.00	0.00	0.00	0.00

EXHIBIT 5(32PS)

https://dos.elections.myflorida.com/cgi-bin/TreSel.exe

Campaign Finance Activity - Division of Elections - Florida Department of State

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Page 2 of 3

		A/					
0	03/01/2018 - 03/31/2018	50.00	0.00	800.00		0.00	0.00
W	03/03/2018 - 04/05/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	03/23/2018 - 04/26/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	03/23/2018 - 04/26/2018	0.00	0.00	0.00	0.00	. 0.00	0.00
W	04/06/2018 - 04/30/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	04/01/2018 - 04/30/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	05/01/2018 - 05/31/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	04/27/2018 - 05/31/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	04/27/2018 - 05/31/2018	0.00	0.00	0.00	0.00	- 0.00	0.00
W	06/01/2018 - 06/22/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	06/23/2018 - 06/29/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	06/30/2018 - 07/06/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	07/07/2018 - 07/13/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	07/14/2018 - 07/20/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	07/21/2018 - 07/27/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	07/28/2018 - 08/03/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	08/04/2018 - 08/10/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	08/11/2018 - 08/23/2018	0.00	0.00	0.00	0.00	0.00	.00
0	08/24/2018 - 08/24/2018	50.00	0.00	0.00	0.00	0.00	0.00
0	08/25/2018 - 08/31/2018	0.00	0.00	0.00	0.00	0.00	0.00
	09/01/2018 - 09/07/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	09/08/2018 - 09/14/2018	0.00	0.00	0.00	0,00	0.00	0.00
W	09/15/2018 - 09/21/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	09/22/2018 - 09/28/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	09/29/2018 - 10/05/2018	0.00	0.00	0.00	0.00	0.00	· 0.00
W	10/06/2018 - 10/12/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	10/13/2018 - 10/19/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	10/20/2018 - 10/26/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	10/27/2018 - 10/27/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	10/28/2018 - 10/28/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	10/29/2018 - 10/29/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	10/30/2018 - 10/30/2018	0.00	0.00	0.00	0.00	0.00	0.00
Ŵ	10/31/2018 - 10/31/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	10/20/2018 - 11/01/2018	0.00	0.00	0.00	0.00	0.00	0.00

EXHIBIT $5(4\delta + 5)$ https://dos.elections.myflorida.com/cgi-bin/TreSel.exe

Campaign Finance Activity Division of Elections - Florida Department of State

Page 3 of 3

					11. 1		
W	11/02/2018 - 11/30/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	12/01/2018 - 12/31/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	01/01/2019 - 01/31/2019	0.00	0.00	0.00	0.00	0.00	0.00
W	01/24/2019 - 02/28/2019	0.00	0.00	0.00	0.00	0.00	0.00
W	02/01/2019 - 02/28/2019	0.00	0.00	0.00	0.00	0.00	0.00
W	03/01/2019 - 03/31/2019	0.00	0.00	0.00	0.00	0.00	0.00
W	03/01/2019 - 04/04/2019	0.00	0.00	0.00	0.00	0.00	0.00
W	04/01/2019 - 04/30/2019	0.00	0.00	0.00	0.00	0.00	0.00
W	04/05/2019 - 05/09/2019	0.00	0.00	0.00	0.00	0.00	0.00
W	05/01/2019 - 05/31/2019	0.00	0.00	0.00	0.00	0.00	0.00
۲	All Dates (Totals)	125.00	0.00	4,300.00	0.00	0.00	0.00

Note: ^(E) indicates that report was filed electronically X Indicates that detail has not been released W Indicates that a waiver was filed and L Indicates that a loan report was filed

V

Select Detail Type Contributions Select Sort Order
Date(Ascending)

Select Output Type
Display On Screen

Submit Query Now

Query the Campaign Finance Data Base

[Department of State] [Division of Elections] [Candidates and Races] [Campaign Finance Information]

EXHIBIT 5(5of 5)



FLORIDA VOTERS CAMPAIGN

4005 Brandon Hill Drive, Tallahassee, Fl 32309. (850)241-5896

June 10, 2019

Florida Elections Commission 107 W. Gaines Street Suite 224 Collins Building Tallahassee, Fl 32399

Re: FEC 19-193

Upon receiving the letter from the Florida Elections Commission (FEC)regarding the referenced complaint, the FEC was contacted to seek clarity about the complaint and advise the commission of our offices many phone calls with the Florida Division of Election to fix what seems a glitch being experienced resulting from a technical snafu on our end.

We informed the FEC during that call that the only solution I our office could see would be for us to physically appear in the Florida division of Elections office to have a staff walk us through what we needed to do to address the error on the complaint.. using our laptop.

Action:

As explained and discussed in communications with Molly Donovan of your office, we have had technical difficulty logging into the system to log reports or make changes over a period of months. I also advised that this would require that we physically go into the Florida Division of Elections Office at the Gray Bldg to request info needed to access the system. For your records, attached is "Electronic Filing System (EFS) Credentials Request Form" executed on June 7. 2019 along with confidential new pin numbers for accessing the system (which perhaps should be redacted by your office as a public records exemption). Additionally, you will find a copy of the email conformation that the waiver for the report specific to case # FEC 19-291 is filed.

We apologize for our inability to get this done earlier. We hope that this satisfy this case. While it has been a year since the Florida Voters Campaign has received any donations whatsoever, we now better understand our duty to file timely reports nonetheless. Thank you for the work that you do

With Warm Regards, I Am

Michael Dobson

Michael Dobson Chairman Florida Voters Campaign

EXHIBIT



70=11110 T- MUL 9102

DIVISION OF ELECTIONS TALL AHASSEE, FL Use this form to request verification or reset of credentials for the DMsion of Election's EFS.

All fields are required to properly fulfill your request.

Name/Committee

Florida Voters Campaign

Signature (Required)

User Identification Number/Account Number (if known)

6974

Are you the:

Candidate/Chairperson Freasurer

___Deputy Treasurer

Check the Box for All Information Needed:

User ID #/Account # Password

List below the individual the credentials may be released to:

Michael Dahso

Contact Phone Number:

(850)241-5896

Requests can be faxed, mailed, or emailed to our office.

Fax: (850) 245-6259 or (850) 245-6260 Email: ElecRecords@dos.myflorida.com

Mailing Address: 500 S. Bronough Street, Tallahassee, FL 32399

*NOTE: Passwords can be requested by and released to the candidate/chairperson or any treasurer. PINs can only be requested by the authorized user. PINs may be released to the assigned user or a designee referenced above.

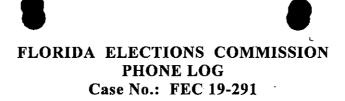
EXHIBIT

HISTORY NOTES Florida Voters Campaign PAC - 69745

Unique ID	Date Recorded	Last Edited Date	Orginally Recorded B
65503	6/7/2019 11:16:00 AM	3	ZJSantos
RE: Credential Request Fo	om	а а	
released the credentials	to Mr. Dobson.		
63672	2/26/2019 8:31:00 AM		dihoward
	contact with Michael Dobson in refer w to delete the G1 Contribution trans		
63593	2/22/2019 9:09:00 AM		dihoward
02/22/2019 - I attempted to only got his voice mail, so	o make contact with Michael Dobson Thad to leave a voice message reque	in reference to the Final Notice ser esting a call back. DLH	it on December 12, 2018. I
63039	1/30/2019 11:19:00 AM		dlhoward
	ict with Michael Dobson and gve him would give me a call no later than to		
62672	1/14/2019 10:32:00 AM		dihoward
	nake contact with Michael Dobson in r, I Left a voice message. DLH	reference to the Final Notice sent of	on December 12, 2018.
58274	5/7/2018 4:50:00 PM		dsbrown
RE: Audit M3			
Mr. Dobson called. I assis	sted him in amending the M3 report. I	His report should now be complete.	
58245	5/2/2018 9:09:00 AM		jcsoria
Re: Report Error			
I tried contacting Mr. Dobs	on		
54009	5/10/2017 12:22:00 PM		SLBagley
RE: 2017 M4			
	Michael, who was filing his first report are to find the handbook when he said		277A
slb	17. 		
		22.0	
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EXHIBIT

12/19/2019



Respondent: Florida Voters Campaign PAC **Complainant:** Division of Elections

1. Date and time: December 18, 2019 @ 2:00 pm

Name: Michael Dobson—Chairman

Phone #: (850) 241-5896

Summary: I had telephone contact to discuss complaint allegations with him. Respondent verified contact/home information. Respondent advised me that he was unaware of any reports being filed against his PAC. He told me that he is currently going through months of mail that he has been too busy to go through. Respondent stated that the PAC was only created to support amendment 4. He stated that once that amendment passed, the PAC stopped collecting any monies or being active. He stated that he should've closed it then, but he got caught up in other activities and it slipped his mind. He advised me that his campaign depository isn't open and hasn't been in over a year. He also advised me that he doesn't even know how to get into the EFS system to file anything. I instructed him to contact DOE for assistance. I went over the investigative process with him. He told me that he didn't' have any money to pay any fine or negotiate a settlement. I recommended that he close the PC if it's not active for him to avoid being penalized further. He stated that he would contact DOE for assistance with this matter as well.

Memo to File? No Entered by: CKO

 Date and time: December 19, 2019 @ 12:45 pm Name: Robert Simms—Bank representative Phone #: (704) 590-9824

Summary: I had telephone contact in response to message left on my behalf. Mr. Simms advised me that Wells Fargo staff wasn't able to locate any information on Respondent or the chairman. I gave mailing address for the PC and other identifying information that I was able to locate. Wells Fargo staff was still unable to locate any information on Respondent. I requested a letter from them detailing their search efforts and inability to locate information on Respondent. Mr. Simms advised me that he would fax over a declaration letter when he receives it.

Memo to File? No Entered by: CKO

3. Date and time: December 19, 2019 @ 1:10 pm Name: Michael Dobson—Chairman

Phone #: (850) 241-5896

Summary: I had telephone contact to inquire again about the depository and their inability to locate any information on Respondent. Mr. Dobson advised me that he was unsure if a depository was ever opened. He stated that he remembers a PayPal account but not sure if it was associated with the PC. I inquired if he had received and read Chapter 106, Florida

Inv001 (10/07)

Statutes and the Political Committee Handbook. Respondent told me that he did not recall ever receiving or reviewing either option. Memo to File? No Entered by: CKO

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EXHIBIT X (20/2

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OF POLITIC	OF ORGANIZATION CAL COMMITTEE	OFFICE USE ONLY
1. Full Name of Committee Florida WO	ters Campaign pA	Telephone
Street Address (Include city,	un Hiji Drive, T state and zip code)	MI laborse, Florida 32309
		Hahossen, Flanda 32309 ses of continuous existence and political
committees) Name of Affiliated or	ſ	
Connected Organization	Mailing Address	Relationship
N/A		
3. Area, Scope and Jurisdict Candidates	and Issues	Support or oppose Statewide Hicounty; and local Cundidates of Fissues
	Organization's Special Interest (e.g., r	
5. Identify by Name, Address	and Position, the Custodian of Book	s and Accounts (include treasurer's name)
Full Name	Mailing Address	Committee Title or Position
Michael Dubson	4005 Brandon Hill Dis Tallahussee, Florida 32	ve Chairperson, Seretary 2309 and treasurer
		-

DS-DE 5 (Rev. 05/06)

EXHIBIT 9(10+2)

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(continued on reverse side)

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Full Name	ny (include chairman's name) Mailing Add	·····	Comp	nittee Title or Position
	4005 Brandon 1 Tall, Fl 3230			s, Secretory Treesure
	Office Sought and Party Affili (if none, please indicate)	ation Each Candidate	or Other	individual that this
Full Name	Mailing Address	Office S	ought	Pairty
TBD 8. List Any Issues this Com		ere m	2 95 52 52 6225	
List Any Issues this Con	mittee is Opposing: 70	be detern	nine d	
9. If this Committee is Sup	porting the Entire Ticket of a	the statement of the resolution resolution	Party	
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Molly Donovan

From:	michael@dobsonandcraig.com on behalf of Michael Dobso <michael@dobsonandcraig.com></michael@dobsonandcraig.com>	n
Sent:	Tuesday, June 25, 2019 9:52 AM	
То:	molly@myfloridalegal.com	
Subject:	Florida Voters Campaign cases	
Attachments:	FI Voters Campaign Pin # renewal request0001.pdf	

Dear Molly,

Please accept this note specific to case(s) 19-315, 19-193 and one other in which i talked to an attorney in your office who sent a letter suggesting that we pay a certain amount. After explaining the situation, that the organization has collected not a red cent in perhaps a year, she said that she would call me back and discuss a lower fee. I never received a return phone call. The attachment shows what i have said, which is i had been having difficulty getting into the system to file waivers. Since i can now get in, we have gone in and , as best i can tell, address the waivers you were concerned about us filing. To that end, we have acted to correct the issue which was two pronged (a) be able to access the system and (b) we have filed the waivers that had not been filed, hoping we got them all. Once in the system, and doing the filing, it seemed like there may have been some duplications. We hope not and that all are filed. We may need to meet with your office to go over them t make sure. Please let us know if there are any report waivers that we have overlooked, as because i can get into the system now, it would be easy for me to address them.

If needed, I can forward you a copy of all of the waiver confirmations we got via email once they were filed. Additionally, I ask that you please look into the case i referred to whereby we received a letter requesting a significant fee whereby i immediately called and talked with the attorney assigned the case. because we can now file the waivers and as best i can tell they have been filed, we hope that satisfies your inquiry. regarding the third case, I have been having a difficult time locating that document and need your office to perhaps resend it or call me at (850) 241-5896 to discuss.

Regards,

Michael Dobson Dobson, Craig and Associates (850) 241-5896 www.Dobsonandcraig.com www.talkingfloridapolitics.com www.livethedreamfoundation.org www.floridaenergyproducers.org www.floridavoterscampaign.org www.Michaeldobson.org

Electronic Filing System (EFS) Credentigle Gues PForm

2019 JUN -7 AM 11=07

DIVISION OF ELECTIONS Use this form to request verification or reset of credentials for the Division of Election's EFS.

All fields are required to properly fulfill your request:

Name/Committee

lorida Voters Campaign

Signature (Required)

User Identification Number/Account Number (if known)

Are you the:

Candidate/Chairperson reasurer

Deputy Treasurer

Check the Box for All Information Needed:

User ID #/Account # Password PIN

List below the individual the credentials may be released to:

Michael Dobs

Contact Phone Number:

850)241-5896

Requests can be faxed, mailed, or emailed to our office.

Fax: (850) 245-6259 or (850) 245-6260 Email: ElecRecords@dos.myflorida.com

Mailing Address: 500 S. Bronough Street, Tallahassee, FL 32399

*NOTE: Passwords can be requested by and released to the candidate/chairperson or any treasurer. PINs can only be requested by the authorized user. PINs may be released to the assigned user or a designee referenced above.



C.

FLORIDA ELECTIONS COMMISSION 107 W. Gaines Street Collins Building, Suite 224 Tallahassee, Florida 32399-1050 Telephone: (850) 922-4539 Fax: (850) 921-0783 www.fec.state.fl.us; fec@myfloridalegal.com

June 17, 2019

Michael Dobson, Chair Florida Voters Campaign PAC 4005 Brandon Hill Drive Tallahassee, FL 32309

RE: Case No.: FEC 19-291; Respondent: Florida Voters Campaign PAC – AMENDED LETTER OF LEGAL SUFFICIENCY

Dear Mr. Dobson:

On May 17, 2019, the Florida Elections Commission received a complaint alleging that you violated Florida's election laws. I have reviewed the complaint and find that it contains one or more legally sufficient allegations. The Commission staff will investigate the following alleged violation(s):

Section 106.07(7), Florida Statutes: As alleged in the complaint, Respondent, a political committee registered with the Division of Elections, failed to notify the filing officer on the prescribed reporting date that no report would be filed on that date because it had not received funds, made contributions, or expended reportable funds during the following reporting period:

2019 M2

However, prior to an investigation, you have the option to <u>resolve your case now by</u> signing a minor violation consent order and <u>paying a fine of \$50</u>, per Rule 2B-1.003, Florida Administrative Code, <u>rather than the potential \$1,000 per violation</u> provided for in Section 106.265, Florida Statutes.

If you sign the consent order, you would not be required to admit or deny the allegation(s) in the complaint, but you would be required to immediately correct the violation, if feasible.

The signed consent order would then be considered by the Commission at its next available meeting, and would constitute final action by the Commission once it is accepted and approved by the Commission.

<u>Please contact Stephanic Cunningham at 850-922-4539</u>, or at the address listed above, to accept this minor violation consent order offer.

Florida Voters Campaign PAC June 17, 2019 Page 2 FEC 19-291

If you choose not to resolve the case by consent order, an investigation will be conducted, and then the Commission will hold one or more hearings to determine whether the alleged violation(s) occurred and, if so, the amount of the fine to be imposed upon you. For more information, please see our FAQs available at <u>http://www.fec.state.fl.us</u>.

Sincerely,

Tim Vaccaró Executive Director

TV/med



FLORIDA ELECTIONS COMMISSION 107 W. Gaines Street Collins Building, Suite 224 Tallahassee, Florida 32399-1050 Telephone: (850) 922-4539 Fax: (850) 921-0783 www.fec.state.fl.us; fec@myfloridalegal.com

June 14, 2019

Michael Dobson, Chair Florida Voters Campaign PAC 4005 Brandon Hill Drive Tallahassee, FL 32309

RE: Case No.: FEC 19-291; Respondent: Florida Voters Campaign PAC

Dear Mr. Dobson;

On May 17, 2019, the Florida Elections Commission received a complaint alleging that you violated Florida's election laws. I have reviewed the complaint and find that it contains one or more legally sufficient allegations. The Commission staff will investigate the following alleged violations:

Section 106.07(7), Florida Statutes: As alleged in the complaint, Respondent, a political committee registered with the Division of Elections, failed to notify the filing officer on the prescribed reporting date that no report would be filed on that date because it had not received funds, made contributions, or expended reportable funds during the following reporting period:

2019 M2

Section 106.19(1)(c), Florida Statutes: As alleged in the complaint, Respondent, a political committee registered with the Division of Elections, may have falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, when it failed to file a report on the prescribed reporting date for the following reporting period:

• 2019 M2

When we conclude the investigation, a copy of the Report of Investigation (ROI) will be mailed to you at the above address. Based on the results of the investigation, a staff attorney will make a written recommendation (Staff Recommendation or SR) to the Commission as to whether there is probable cause to charge respondent with violating Chapters 104 or 106, Florida Statutes. You will have an opportunity to respond to both the ROI and the SR. The Commission will then hold one or more hearings to determine whether the alleged violations occurred and, if so, the amount Florida Voters Campaign June 14, 2019 Page 2 FEC 19-291

of the fine to be imposed. You and the complainant will receive notice at least 14 days before any hearing at which your case is to be considered.

Please note that all documents related to this matter will be mailed to the above address unless you **notify us of a new address**. Also, please remember that complaints, Commission investigations, investigative reports, and other documents relating to an alleged violation of Chapters 104 or 106, Florida Statutes, are **confidential** until the Commission finds probable cause or no probable cause.

For additional information, please refer to the "Frequently Asked Questions" section of the Commission's website (www.fec.state.fl.us).

If you have additional questions, please contact Keith Smith, the investigator assigned to this case.

Sincerely. Viceno

Tim Vaccaro Executive Director

TV/med

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Response to complaint # 19-291... Florida Voters CampaignMichael Dobson to: fec@myfloridalegal.com, molly@myfloridalegal.com 06/11/2019 01:37 PMSent by: <michael@dobsonandcraig.com> From: "Michael Dobson" <michael@dobsonandcraig.com> To: "fec@myfloridalegal.com" <fec@myfloridalegal.com>, "molly@myfloridalegal.com" <molly@myfloridalegal.com> Sent by: <michael@dobsonandcraig.com> 3 Attachments

<u>م</u> Florida Voters Campaign ltr- FEC case 19-291 June 10.pdf Fl Voters Campaign Pin # renewal request0001.pdf

Solution 10 €

Fl Voters campaign M-2 waiver confirmation.pdf

Dear Sir/Madam:

Please accept the attached response, of June 10, 2019 to the complaint that is case # 19-291. we pray that this satisfies the concerns of the complaint. Please do not hesitate to call if you have any questions.

Michael Dobson **Dobson, Craig and Associates** (850) 241-5896 www.Dobsonandcraig.com www.talkingfloridapolitics.com www.livethedreamfoundation.org www.floridaenergyproducers.org www.floridavoterscampaign.org www.Michaeldobson.org



FLORIDA VOTERS CAMPAIGN

4005 Brandon Hill Drive, Tallahassee, Fl 32309. (850)241-5896

June 10, 2019

Florida Elections Commission 107 W. Gaines Street Suite 224 Collins Building Tallahassee, Fl 32399

Re: FEC 19-193

Upon receiving the letter from the Florida Elections Commission (FEC)regarding the referenced complaint, the FEC was contacted to seek clarity about the complaint and advise the commission of our offices many phone calls with the Florida Division of Election to fix what seems a glitch being experienced resulting from a technical snafu on our end.

We informed the FEC during that call that the only solution I our office could see would be for us to physically appear in the Florida division of Elections office to have a staff walk us through what we needed to do to address the error on the complaint.. using our laptop.

Action:

As explained and discussed in communications with Molly Donovan of your office, we have had technical difficulty logging into the system to log reports or make changes over a period of months. I also advised that this would require that we physically go into the Florida Division of Elections Office at the Gray Bldg to request info needed to access the system. For your records, attached is "Electronic Filing System (EFS) Credentials Request Form" executed on June 7. 2019 along with confidential new pin numbers for accessing the system (which perhaps should be redacted by your office as a public records exemption). Additionally, you will find a copy of the email conformation that the waiver for the report specific to case # FEC 19-291 is filed.

We apologize for our inability to get this done earlier. We hope that this satisfy this case. While it has been a year since the Florida Voters Campaign has received any donations whatsoever, we now better understand our duty to file timely reports nonetheless. Thank you for the work that you do

With Warm Regards, I Am

Michael Dobson

Michael Dobson Chairman Florida Voters Campaign

Electronic Filing System (EFS) Credentigerequest Form

2019 JUN -7 AM 11=07

DIVISION OF ELECTIONS Use this form to request verification or reset of credentials for the DMsion of Election's EFS.

All fields are required to properly fulfill your request:

Name/Committee

Florida Voters Campaign, Phi

Signature (Required)

User Identification Number/Account Number (if known)

69745

Are you the:

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Candidate/Chairperson **Freasurer**

___Deputy Treasurer

Check the Box for All Information Needed:

User ID #/Account # Password PIN

List below the individual the credentials may be released to:

Contact Phone Number:

(850)241-5896

Michael Dobson

Requests can be faxed, mailed, or emailed to our office.

Fax: (850) 245-6259 or (850) 245-6260 Email: ElecRecords@dos.myflorida.com

Mailing Address: 500 S. Bronough Street, Tallahassee, FL 32399

*NOTE: Passwords can be requested by and released to the candidate/chairperson or any treasurer. PINs can only be requested by the authorized user. PINs may be released to the assigned user or a designee referenced above.

Acct	Seq	РТуре	ctaFullname	PValue	ResetDate	ResetBy	Status	PrintDate
69745	1	PIN	Michael Dobson		6/7/2019 11:10:07 AM	krwillis	PEN	Treas
69745	0	PIN			6/7/2019 11:10:06 AM	krwillis	PEN	Chain
69745	0	PWD			6/7/2019 11:10:01 AM	krwillis	PEN	
69745	1	PIN	Michael Dobson	*	4/7/2017 10:29:05 AM	dsbrown	PRT	4/7/2017
69745	0	PIN			4/7/2017-10:29:05 AM	dsbrown	PRT	4/7/2017
69745	0	PWD	i i i i i i i i i i i i i i i i i i i		4/7/2017 10:29:05 AM	dsbrown	PRT	4/7/2017
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6/11/2019

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Waiver Filed

Tue, Jun 11, 2019 10:22 am From: efsReportFiled@dos.myflorida.com To: me and 1 recipients

Account Number: 69745 Account Name: Florida Voters Campaign PAC Report Year: 2019 Report Type: M2 Report Status: Waiver Filed

This is to confirm that a waiver has been filed for the above referenced report.

If you have any questions or need further assistance, please contact the help desk at 850-245-6280.

Regards,

Kristi Reid Willis, Chief Bureau of Election Records

DIVISION OF ELECTIONS FEC NOTICE FORM

To FEC from Division of Elections

Name:Florida Voters Campaign PACAccount Number:69745Chairperson:Michael DobsonTreasurer:Michael DobsonRegistered Agent:Michael Dobson

The Division of Elections hereby provides this notice to the Florida Elections Commission pursuant to Sections 106.07(8)(d), 106.22(7), and 106.25(2), Florida Statutes. An apparent violation of Chapter 106, Florida Statutes, has occurred based upon the failure to file a report after notice or failure to file a notification to the filing officer in writing that no report was being filed on the prescribed reporting date under s. 106.07(7).

Report(s):

2019 M2

- Florida Voters Campaign PAC (69745) is a political committee registered with the Division. On April 6, 2017, Michael Dobson filed the DSDE 5 and DSDE 6 with the Division of Elections indicating that he was the chairperson.
- The 2019 M2 campaign treasurer's report was due on March 11, 2019. On March 13, 2019, the Division mailed Mr. Dobson notification that the 2019 M2 campaign treasurer's report had not been filed.
- On March 26, 2019, the Division mailed Mr. Dobson notification that the 2019 M2 campaign treasurer's report had not been filed.
- On April 22, 2019, the Division mailed Mr. Dobson final notification with delivery confirmation that the 2019 M2 report had not been filed. (See attached letter and delivery confirmation.)
- Mr. Dobson did not notify the Division of Elections prior to or on the prescribed reporting date for the 2019 M2 report that no report was to be filed.

• As of May 9, 2019, Mr. Dobson has not filed the 2019 M2 report.

Sent By: Kristi Reid Willis کری Date: May 9, 2019

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FLORIDA DEPARTMENT OF STATE Laurel M. Lee Secretary of State

DIVISION OF ELECTIONS

Final Notice Delivery Confirmation:

USPS TRACKING # 9' & CUSTOMER RECEIPT

 9114 9014 9645 1724 1567 60 For Tracking or inquirtes go to USPS com or call 1-800-222-1811.

April 22, 2019

Michael Dobson, Chairperson Florida Voters Campaign PAC 4005 Brandon Hill Drive Tallahassee, FL 32309-2309

PAC 69745

Dear Mr. Dobson:

A recent review of the Division's records show that the Division has not yet received the belowreferenced campaign treasurer's report or the required notification that no reportable activity occurred, whichever is applicable, during the following cover period:

Year	Report	Cover Period
2019	M2	2/1/19 - 2/28/19

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

As we stated in the prior notices, even if you now file the report or notification, the untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

If you have any questions, please contact the help desk at (850) 245-6280.

Sincerely, ia Willis

Kristi Reid Willis, Chief Bureau of Election Records

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