

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**In Re: Tea Time Political Association**

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**Case No.: FEC 22-069**

**TO:** Karin Dennis, Chair  
221 Arbor Lakes Circle  
Sanford, FL 32771

Division of Elections  
500 South 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, **August 15, 2023 at 8:30 a.m., or as soon thereafter as the parties can be heard**, at the following location: **Virtual Meeting via GoTo Webinar:**

WEB PARTICIPATION: <https://attendee.gotowebinar.com/register/4391393799096818270>

AUDIO PARTICIPATION: 1 877 309 2074    ATTENDEE ACCESS CODE: 424-284-031

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  
August 1, 2023

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,

Case No.: FEC 22-069

v.

Tea Time Political Association,  
Respondent.

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ORDER OF PROBABLE CAUSE

**THIS MATTER** was heard by the Florida Elections Commission (“Commission”) at its regularly scheduled meeting on May 16, 2023, in Tallahassee, Florida.

On February 8, 2023, Staff recommended to the Commission that there was probable cause to believe that the Florida Election Code was violated. The facts articulated in Staff’s Recommendation are adopted by reference and incorporated herein. Based on the Complaint, Report of Investigation, Staff’s Recommendation, and oral statements (if any) made at the probable cause hearing, the Commission finds that there is **probable cause** to charge Respondent with the following violation:

**THIS SPACE INTENTIONALLY LEFT BLANK**

**Count 1:**

On or about December 10, 2021, Tea Time Political Association 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 2021 M11 Report.

**DONE AND ORDERED** by the Florida Elections Commission on May 16, 2023.



Tim Vaccaro, J.D., Executive Director  
For Joni Alexis Poitier, Vice Chair  
Florida Elections Commission

Copies furnished to:  
Mattie T. Clay, Assistant General Counsel  
Tea Time Political Association, Respondent  
Division of Elections, 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 consent order 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 informal hearing held before the Commission, if you do not dispute any material fact in the Staff Recommendation. You have thirty (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 formal hearing 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 thirty (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 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 thirty (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 West 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.

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**In Re: Tea Time Political Association**

**Case No.: FEC 22-069**

**TO:** Karin Dennis, Chair  
221 Arbor Lakes Circle  
Sanford, FL 32771

Division of Elections  
500 South 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, **May 16, 2023 at 8:30**, or as soon thereafter as the parties can be heard, at the following location: **Join Zoom Meeting:**

[https://us06web.zoom.us/meeting/register/tZMpduMuqTsqGt1MNuVpQBOI5XPapAI\\_9zfC](https://us06web.zoom.us/join/https://us06web.zoom.us/meeting/register/tZMpduMuqTsqGt1MNuVpQBOI5XPapAI_9zfC)

Audio Participation:  
Dial: 1 301 715 8592

Meeting ID:  
874 1067 0009

Passcode:  
772737

After registering, you will receive a confirmation email containing information about joining the meeting.

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**Tim Vaccaro**

Executive Director  
Florida Elections Commission  
May 2, 2023

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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**

**In Re: Tea Time Political Association**

**Case No.: FEC 22-069**

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**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 October 31, 2022, the following facts and law support this staff recommendation:

1. On March 9, 2022, the Florida Elections Commission (“Commission”) received a referral from the Department of State, Division of Elections (“Division”), alleging that Tea Time Political Association (“Respondent”) violated Chapter 106, Florida Statutes.

2. Respondent is a political committee registered with the Division. (ROI Exhibit 2; Attachment A)<sup>1</sup> Karin Dennis was appointed to serve as the committee’s chairperson and treasurer. (ROI Exhibit 1, page 2; ROI Exhibit 2, pages 1-2)

3. By letter dated September 14, 2022, the Executive Director notified Respondent 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 2021 M11 reporting period.

4. By letter dated June 21, 2021, Donna S. Brown, 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 Political Committees forms. (ROI Exhibit 3, page 1)

5. The acknowledgment letter advised Respondent that all committees filing reports with the Division are required to use the electronic filing system (“EFS”), and provided Respondent with a user identification number and initial password to grant access to the EFS. (ROI Exhibit 3, page 1) The letter further advised Respondent that all the Division’s publications and reporting forms were available on its website and directed Respondent to print out the *Calendar of Reporting Dates* as well as other relevant documents. (ROI Exhibit 3, page 2)

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<sup>1</sup> The Report of Investigation is referred to herein as “ROI.”



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.

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 4, page 2) 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 5, page 2)

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 6, page 1)

<b>Report</b>	<b>Report Cover Period</b>	<b>Date Notification Due</b>	<b>Date Notification Filed</b>	<b>No. of Days Late</b>
2021 M11	11/01/21 – 11/30/21	12/10/21	03/20/22	100

9. The chairperson stated she filed late because of four deaths in her family from June 2021 onward, and she had been dealing with their affairs since then. She stated she did her best to reconcile the problem though she acknowledged that some items may have been overlooked. The chairperson stated that a bank account had not been opened for Respondent, but she indicated that it would be opened for the upcoming election cycle. The chairperson had not read the *Political Committee Handbook* or Chapter 106, Florida Statutes. (ROI Exhibit 7, pages 3-5)

10. “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).

11. 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 2021 M11 reporting period.

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 December 10, 2021, Tea Time Political Association 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 2021 M11 Report.

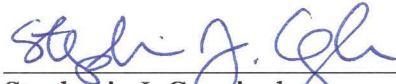
Respectfully submitted on February 8, 2023.



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Mattie T. Clay  
Assistant General Counsel

I reviewed this Staff Recommendation this 6<sup>th</sup> day of February 2023.



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Stephanie J. Cunningham  
General Counsel

## *Committee Tracking System*

### **Tea Time Political Association**

**Type:**Political Committee

**Status:**Active

**Address:**Post Office Box 471116  
Lake Monroe, FL 32747

**Phone:**(407)391-9378

**Chairperson:**Karin Dennis  
221 Arbor Lakes Circle  
Sanford, FL 32771

**Treasurer:**Karin Dennis  
Post Office Box 470282  
Lake Monroe, FL 32747

**Registered Agent:**Karin Dennis  
221 Arbor Lakes Circle  
Sanford, FL 32771

**Purpose:**

**Affiliates:**

Campaign Finance Activity

Campaign Documents

**FLORIDA ELECTIONS COMMISSION**

**Report of Investigation for Failure to Notify Filing Officer**

**Case Number: FEC 22-069**

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

**Respondent:** Tea Time Political Association  
**Respondent's Atty:** N/A

**Division of Elections (Division)**  
**Referral Filed:** March 9, 2022

**Respondent Type:** Political Committee

**I. Preliminary Information:**

1. Respondent is a political committee registered with the Division.
2. An Appointment of Campaign Treasurer and Designation of Campaign Depository (DS-DE 6) was filed on June 7, 2021. Karin Dennis was appointed as campaign treasurer. To review the DS-DE 6s, refer to Exhibit 1.<sup>1</sup>
3. A Statement of Organization (DS-DE 5) for the political committee was filed with the Division on June 17, 2021. To review the Statement of Organization, refer to Exhibit 2.
4. An acknowledgement letter was mailed to the address provided on the DS-DE 6 on June 21, 2021, advising Respondent that all political committees filing reports with the Division are required to file by means of the Division's electronic filing system (EFS). Respondent was provided with a user identification number and initial password allowing access to the EFS.
5. The acknowledgement letter also advised 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*. The letter further advised that it was Respondent's responsibility to read, understand, and follow the requirements of Florida's election laws. To review the acknowledgement letter, refer to Exhibit 3.
6. The *Political Committee Handbook* discusses filing a waiver when there is no activity to disclose. To review the relevant page of the *Handbook*, refer to Exhibit 4.
7. The *Political Committee EFS User's Guide* discusses how to notify the Division on the prescribed reporting date that no report will be filed using the EFS. Specifically, the *Handbook* instructs the user to click the box next to "waiver" if there is no activity to disclose. To review the relevant pages from the *EFS User's Guide*, refer to Exhibit 5.

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

8. I investigated whether Respondent violated this section of the election laws by not timely notifying the filing officer, in writing, that no report would be filed due to not receiving any contributions or making expenditures during the following reporting period. To review Respondent's filing history reflecting the untimely filed notification summarized below, refer to Exhibit 6.

<sup>1</sup> Another form was subsequently filed designating a secondary depository but leaving Ms. Dennis as treasurer.

Report	Report Cover Period	Date Notification Due	Date Notification Filed	No. of Days Late
2021 M11	11/01 – 11/30/2021	12/10/21	03/20/2022	100

9. Respondent did not respond to the referral.

10. I attempted to contact Ms. Dennis, who is also Respondent’s Chairperson, on four occasions in order to provide an opportunity to respond to the allegations made in the referral. However, as of the date of this report, my calls have not been returned. However, while investigating a prior referral filed against Respondent based on Section 106.07(7), Florida Statutes, I had been able to interview Ms. Dennis, who stated that the waiver at issue in that case (2021 M6), was filed late because of four deaths in her family occurring from June 2021 onward, and she had been dealing with their affairs since then. Ms. Dennis added that she had done her best to reconcile the problem, though she acknowledged that some items may have been overlooked. Ms. Dennis also stated that a bank account had not been opened for Respondent, but she indicated that it would be opened for the upcoming election cycle. Ms. Dennis stated that she had not read the *Political Committee Handbook* or Chapter 106, Florida Statutes. To review the phone logs, refer to Exhibit 7.

SIGNATURE OF INVESTIGATOR: \_\_\_\_\_



Date: October 31, 2022

**FLORIDA ELECTIONS COMMISSION**  
**REPORT OF INVESTIGATION**  
**Tea Time Political Association – FEC 22-069**

<b>LIST OF EXHIBITS</b>	
<b>Exhibits #s</b>	<b>Description of Exhibits</b>
Exhibit 1	Appointment of Campaign Treasurer and Designation of Campaign Depository for Political Committees (DS-DE 6)
Exhibit 2	Statement of Organization (DS-DE 5)
Exhibit 3	Acknowledgement Letter
Exhibit 4	Political Committee Handbook – Filing a Waiver
Exhibit 5	Electronic Filing System User Guide – How to File a Waiver
Exhibit 6	Filing History
Exhibit 7	Phone Log

**APPOINTMENT OF CAMPAIGN TREASURER  
AND DESIGNATION OF CAMPAIGN  
DEPOSITORY FOR  
POLITICAL COMMITTEES**  
(Sections 106.011(2) and 106.021(1), F.S.)


RECEIVED  
2021 JUL 12 AM 10:40  
DIVISION OF ELECTIONS

**CHECK APPROPRIATE BOX:**

Initial Filing for:  Primary Treasurer  Deputy Treasurer

Re-filing to Change:  Primary Treasurer  Deputy Treasurer  Primary/Secondary Depository

OFFICE USE ONLY

1. Committee Tea Time Political Association		2. Telephone (407 ) 391 9378	
3. Name of Treasurer or Deputy Treasurer Karin N W Dennis		4. Email (optional)	
5. Telephone (optional) (407) 796-1996		6. Mailing Address P O Box 471116 Lake Monroe, FL 32747	
7. Street Address 221 Arbor Lakes Circle Sanford, FL 32771			
8. The following bank has been designated as the <input type="checkbox"/> Primary Depository <input checked="" type="checkbox"/> Secondary Depository			
9. Name of Bank Bank of America		10. Street Address 5320 W State Rd 46 Sanford, FL 32771	
11. City Sanford		12. State FL	13. Zip Code 32771
14. Signature of Chairman 		15. Name of Chairman (Print or Type) Karin N W Dennis	

**Campaign Treasurer's Acceptance of Appointment**

I, Karin N W Dennis, do hereby accept the appointment as  
(Please Print or Type)  
treasurer or deputy treasurer for Tea Time Political Association  
(Committee)

**UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING CAMPAIGN TREASURER'S  
ACCEPTANCE OF APPOINTMENT AND THAT THE FACTS STATED ARE TRUE.**

June 17, 2021

Date



Signature of Campaign Treasurer or Deputy Treasurer

**APPOINTMENT OF CAMPAIGN TREASURER  
AND DESIGNATION OF CAMPAIGN  
DEPOSITORY FOR  
POLITICAL COMMITTEES**  
(Sections 106.011(2) and 106.021(1), F.S.)


RECEIVED  
DEPARTMENT OF STATE  
2021 JUN -7 AM 9:50  
DIVISION OF STATE AFFAIRS

**CHECK APPROPRIATE BOX:**

Initial Filing for:  Primary Treasurer  Deputy Treasurer

**OFFICE USE ONLY**

Re-filing to Change:  Primary Treasurer  Deputy Treasurer  Primary/Secondary Depository

1. Committee Tea Time Political Association		2. Telephone (407 )391-9378	
3. Name of Treasurer or Deputy Treasurer Karin Dennis		4. Email (optional) ( )	
5. Telephone (optional) ( )			
6. Mailing Address P O Box 471116 Lake Monroe, FL 32747			
7. Street Address 221 Arbor Lakes Circle Sanford, FL 32771			
8. The following bank has been designated as the <input checked="" type="checkbox"/> Primary Depository <input type="checkbox"/> Secondary Depository			
9. Name of Bank Bank of America		10. Street Address 5230 W State Rd 46	
11. City Sanford		12. State FL	13. Zip Code 32771
14. Signature of Chairman 		15. Name of Chairman (Print or Type) Karin Dennis	

**Campaign Treasurer's Acceptance of Appointment**

I, Karin Dennis, do hereby accept the appointment as  
(Please Print or Type)  
treasurer or deputy treasurer for Tea Time Political Association  
(Committee)

**UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING CAMPAIGN TREASURER'S  
ACCEPTANCE OF APPOINTMENT AND THAT THE FACTS STATED ARE TRUE.**

6/14/21   
Date Signature of Campaign Treasurer or Deputy Treasurer



# STATEMENT OF ORGANIZATION OF POLITICAL COMMITTEE

(PLEASE TYPE)

OFFICE USE ONLY  
**RECEIVED**  
2021 JUN 17 AM 9:14  
DIVISION OF

<b>1. Full Name of Committee</b> Tea Time Political Association	<b>Telephone</b> 407-391-9378
--	----------------------------------

Mailing Address (include city, state and zip code)  
P O Box 471116  
Lake Monroe, FL 32747

Street Address (include city, state and zip code)  
221 Arbor Lakes Circle  
Sanford, FL 32771

**2. Affiliated or Connected Organizations (includes other committees of continuous existence and political committees)**

Name of Affiliated or Connected Organization	Mailing Address	Relationship
N/A		

**3. Area, Scope and Jurisdiction of the Committee**  
Political committees supporting or opposing statewide, legislative, multicounty candidates and/or issues

**4. Nature of Organization or Organization's Special Interest (e.g., medical, legal, education, etc.)**  
government

**5. Identify by Name, Address and Position, the Custodian of Books and Accounts (include treasurer's name)**

Full Name	Mailing Address	Committee Title or Position
Karin Dennis	P O Box 471116 Lake Monore, FL 32747	Treasure

**6. List by Name, Address and Position, Other Principal Officers, Including Officers and Members of the Finance Committee, If Any (include chairman's name)**

Full Name	Mailing Address	Committee Title or Position
Karin Dennis	221 Arbor Lakes Circle Sanford, FL 32771	Chairperson

**7. List by Name, Address, Office Sought and Party Affiliation Each Candidate or Other Individual that this Committee is Supporting (if none, please indicate)**

Full Name	Mailing Address	Office Sought	Party
TBD			

**8. List Any Issues this Committee is Supporting:** TBD

**List Any Issues this Committee is Opposing:** TBD

**9. If this Committee is Supporting the Entire Ticket of a Party, Give Name of Party**

TBD

**10. In the Event of Dissolution, What Disposition will be Made of Residual Funds?**

We would give the proceeds to a 501c3 non profit

**11. List all Banks, Safety Deposit Boxes, or Other Depositories Used for Committee Funds**

Name of Bank or Depository & Account Number	Mailing Address
Wells Fargo	100 Lake Mary Blvd Lake Mary, FL 32746

**12. List all Reports Required to be Filed by this Committee with Federal Officials and the Names, Addresses and Positions of Such Officials, If Any**

Report Title	Dates Required to be Filed	Name & Position of Official	Mailing Address
8871	Upon Creation	IRS	Ogden, UT
1120-POL	Annual	IRS	Ogden, UT
990	Annual	IRS	Ogden, UT

STATE OF Florida Seminole COUNTY

I, Karin N W Dennis, certify that the information in this Statement of

Organization is complete, true and correct.

**X**   
Signature of Chairman of Political Committee

6/15/2021  
Date



## FLORIDA DEPARTMENT *of* STATE

**RON DESANTIS**  
Governor

**LAUREL M. LEE**  
Secretary of State

June 21, 2021

Karin Dennis, Chairperson  
Tea Time Political Association  
221 Arbor Lakes Circle  
Sanford, Florida 32771

Dear Ms. Dennis:

This will acknowledge receipt of the Statement of Organization and Appointment of Campaign Treasurer and Designation of Campaign Depository for **Tea Time Political Association**, which were placed on file in our office on June 17, 2021. 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 **July 12, 2021**. The report will cover the period of June 1-30, 2021 (2021 M6). 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).

### EFS Access

Below is the web address to access the EFS and the committee's user identification number. Enclosed are the committee's confidential, filing credentials.

**EFS Website Address:** <https://efs.dos.state.fl.us>  
**Identification Number:** 79519

### Timely Filing

All reports must be completed and filed through the EFS no later than midnight, Eastern Standard Time, of the due date. Reports not filed by midnight 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

Karin Dennis, Chairperson  
June 21, 2021  
Page Two

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 three days late and, thereafter, \$500 per day for each late 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 for each late 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.

### **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 <https://dos.myflorida.com/elections>. 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,



Donna S. Brown, Chief  
Bureau of Election Records

DSB/zjs

Enclosures

# Political Committee Handbook



Florida Department of State  
Division of Elections  
R. A. Gray Building, Room 316  
500 South Bronough Street  
Tallahassee, FL 32399-0250  
850.245.6280

(Rev. 11/16/2021)

must file reports on the 60<sup>th</sup> day immediately preceding the primary election and bi-weekly on each Friday thereafter through and including the 4<sup>th</sup> day immediately preceding the general election, with additional reports due on the 25<sup>th</sup> and 11<sup>th</sup> days before the primary election and the general election.

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 five 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.

*(Sections [106.07](#), [106.0705](#), and [106.141](#), Fla. Stat.;  
[Chapter 11: Electronic Filing of Campaign Reports](#))*

### 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\(8\)](#), Fla. Stat.)*

### 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. However, the political committee **must still notify the filing officer in writing on or before the prescribed reporting date that no report is being filed on that date.** (A notice of no activity filed with the Division must be filed electronically using the [EFS](#).) The next report filed must specify that the report covers the entire period between the last submitted report and the report being filed. *Note: Any activity added to the waived report after the due date is subject to a late filing fine.*

*(Sections [106.07\(7\)](#) and [106.0705](#), Fla. Stat.)*

**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**

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

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

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**.

Election Cycle: 2010 General Election  
Report Type: F2 2010  
Coverage Period: 7/17/2010 7/30/2010 Due Date: 08/06/2010  
 Special Election Report  Waiver

Click  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 - G4 - 27 2010 General Election Covers: 10/16/2010-10/28/2010 Due: 10/29/2010  
 Amendment  Waiver Complete Status: Incomplete Detail Records  
File Date: Review Status: Not Reviewed  
Status: Data Entry Last Review:  
# of Transactions: 0      

Contributions	Total Amount	Expenditures	Total Amount
Cash and Checks:	0.00	Monetary:	0.00
Loans:	0.00	Transfers to Off Acct:	0.00
Total Monetary:	0.00	Total Monetary:	0.00
In-Kind:	0.00	Other Distributions:	0.00

Review Messages  
Created: 10/26/2010 11:41:25 AM By: 50552 Revised: 10/26/2010 11:41:25 AM By: 50552





Florida Department of State - Division of Elections

Florida Election System Reports

Candidate/Committee Lookup

Name: tea time

Committee Name: Tea Time Political Association

Account: 79519

Election:

Dropdown menu for Election selection

Acct: 79519

Type: Committee

Search

Reset

Date Due	Type	Date Filed	Status	Days Late	Fine Assessed	Appealed	Amount Fined	Amount Paid
4/11/2022	M3		SNT	0	\$0.00		\$0.00	\$0.00
3/10/2022	M2	3/20/2022	CLO	10	\$0.00		\$0.00	\$0.00
2/10/2022	M1	3/20/2022	CLO	38	\$0.00		\$0.00	\$0.00
2/10/2022	SG1	3/20/2022						
1/10/2022	M12	3/20/2022	PEN	69	\$0.00		\$0.00	\$0.00
1/7/2022	SP2	3/20/2022						
12/10/2021	M11	3/20/2022	PEN	100	\$0.00		\$0.00	\$0.00
11/10/2021	M10	3/20/2022	PEN	130	\$0.00		\$0.00	\$0.00
10/12/2021	M9	3/20/2022	PEN	159	\$0.00		\$0.00	\$0.00
9/10/2021	M8	10/2/2021	CLO	22	\$0.00		\$0.00	\$0.00
8/10/2021	M7	10/2/2021	CLO	53	\$0.00		\$0.00	\$0.00
7/12/2021	M6	10/2/2021	CLO	82	\$0.00		\$0.00	\$0.00

**FLORIDA ELECTIONS COMMISSION  
PHONE LOG  
Case No.: FEC 22-069**

**Respondent: Tea Time Political Committee**

**Complainant: Division of Elections**

1. **Date and time:** October 28, 2022 @ 1:30 pm  
**Name:** Karin Dennis - Chair  
**Phone #:** 407-469-0707  
**Summary:** I attempted to contact Respondent using the information provided on the contact sheet via the Division. The call was unsuccessful.  
**Entered by:** Brian Ayres
2. **Date and time:** October 31, 2022 @ 12:15pm  
**Name:** Karin Dennis - Chair  
**Phone #:** 786-469-0707  
**Summary:** I called and left a voicemail with Ms. Dennis. However it was unclear if this was her personal number or her PC number. I will call the PC number found on the Division website next.  
**Entered by:** Brian Ayres
3. **Date and time:** October 31, 2022 @ 12:15pm  
**Name:** Karin Dennis - Chair  
**Phone #:** 407-391-9378  
**Summary:** The number was no longer in service. I will continue to reach Respondent with previous number used in previous cases.  
**Entered by:** Brian Ayres
4. **Date and time:** October 31, 2022 @ 12:20pm  
**Name:** Karin Dennis  
**Phone #:** 786-469-0707  
**Summary:** I called the number back to leave a more detailed message. I left my email address and information in R's voicemail box to attempt a time to call and discuss this case. It was unclear if this was a professional or personal account as she stated she was "Lady Dennis" which was different from the previous case's voicemail box greeting.  
**Entered by:** Brian Ayres
5. **Date and time:**  
**Name:**  
**Phone #:**  
**Summary:**  
**Entered by:**

**RESPONDENT INTERVIEW MEMO – Call details at #[LOG NUMBER]**

- When did you activate the campaign depository for this PC?
- Why were you unable to submit the 2021 M11, November 2021, notice of no activity on time?
- Have you been able to read or gain access to Chapter 106, *F.S.* since we last spoke?
- Have you been able to read or gain access to the *Political Committee's Handbook* since we last spoke?
- Do you have anything else to add for the Commission's consideration regarding the charges specified in the letter of legal sufficiency in this case?

**FLORIDA ELECTIONS COMMISSION  
PHONE LOG  
Case No.: FEC 21-446**

**Respondent: Tea Time Political Association**

**Complainant: Division of Elections**

1. **Date and time:** April 22, 2022 @ 1:58pm  
**Name:** Karin Dennis - Respondent  
**Phone #:** 407-391-9378  
**Summary:** I called Respondent on their phone number provided on their DS-DE 6 to interview them about the case 21-446. Respondent did not answer.  
**Entered by:** Brian Ayres
2. **Date and time:** April 22, 2022 @ 2:00pm  
**Name:** Karin Dennis - Respondent  
**Phone #:** 407-796-1996  
**Summary:** I called Respondent on their alternate phone number provided by their DS-DE 6, to interview them about the case 21-446. Respondent did not answer.  
**Entered by:** Brian Ayres
3. **Date and time:** April 22, 2022 @ 2:40 pm  
**Name:** Karin Dennis - Respondent  
**Phone #:** 786-469-0707  
**Summary:** Respondent called after receiving my voicemail. Respondent stated she has lost many family members from June 2021 on, and has been dealing with their affairs since then. She understood that there may have been some items overlooked on. I discussed that I am looking in on why her first report was late. She stated it was because of her family losses. Respondent has been a part of a previous political committee "Best West Orlando" but did not have a copy of Chapter 106, Florida Statutes. The call was lost before I could see if she had a copy of the Political Handbook.  
**Entered by:** Brian Ayres
4. **Date and time:** May 4, 2022 @ 1:15 pm  
**Name:** Karin Dennis -Respondent  
**Phone #:** 786-469-0707  
**Summary:** I called Respondent back after the previous call was dropped. The mail inbox was full and I was unable to leave a message. I will try the other phone numbers associated with the Respondent.  
**Entered by:** Brian Ayres
5. **Date and time:** May 4, 2022 @ 1:15 pm  
**Name:** Karin Dennis - Respondent  
**Phone #:** 407-391-9378  
**Summary:** I left a voicemail for Respondent to reach me to conclude our previous conversation.  
**Entered by:** Brian Ayres

6. **Date and time:** May 5, 2022 @ 11:00 am  
**Name:** Karin Dennis - Respondent  
**Phone #:** 407-931-9378  
**Summary:** I called Respondent, she did not answer and the call went straight to voicemail.  
**Entered by:** Brian Ayres
  
7. **Date and time:** May 5, 2022 @ 11:00 am  
**Name:** Karin Dennis - Respondent  
**Phone #:** 786-469-0707  
**Summary:** Respondent answered, however she was with a candidate and I will call in 15 minutes. She said she thought she had filed all reports needed to be filed.  
**Entered by:** Brian Ayres
  
8. **Date and time:** May 5, 2022 @ 11:15 am  
**Name:** Karin Dennis - Respondent  
**Phone #:** 786-469-0707  
**Summary:** Respondent stated that there has not been a bank account open for Tea Time Political, but it will be opened soon for this upcoming election cycle. Respondent stated that this and the other reports filed late were only because of the loss in her family and she has done her best to reconcile the problem. Respondent stated that with her opening a bank account for the PC she will be sure to follow the election code as well as reach out to her previous PC acquaintance. Respondent stated that she has been working with the Division on when the PC becomes financially active.  
**Entered by:** Brian Ayres

**RESPONDENT INTERVIEW MEMO – Call details at #3**

- Why was your M6 report filed late?  
Lost two uncles, her grandmother, and her cousin. Can present obituaries if needed.
- Have you ever run for public office? If so, please name each office you ran for and state what year each election occurred.  
no
- Have you ever been appointed to act as a campaign treasurer for a candidate? If so, please name each such candidate, the office each ran for, and state what year each election occurred.  
no
- Have you ever held the office of chairperson, treasurer, or other similar position for a political committee or electioneering communications organization? If so, please name each committee, state the office you held for each, and state when you held each office.  
One – pac – best west Orlando (unfounded)
- Have you ever prepared or signed a campaign treasurer’s report? If so, please state the name of the candidate or committee whose report you prepared or signed.  
no
- What action have you taken to determine your responsibilities under Florida’s election laws?

- Do you possess a copy of Chapter 106, Florida Statutes? If so, when did you first obtain it? Have you read it?

No -

- Do you possess a copy of the *Political Committee Handbook*? If so, when did you first obtain it? Have you read it?

No -

- Did you receive any other materials from your filing officer? If so, please describe them.

Not to her recollection.

- Do you have anything else to add for the Commission's consideration regarding the charges specified in the letter of legal sufficiency in this case?

**Lost her grandmother, 2 uncles, and cousin since mid 2021. She has been dealing with her family's matters since then and has just recently started to get focused back on working with candidates.**



# Florida Elections Commission

107 West Gaines Street, Suite 224 Tallahassee, Florida 32399-6596  
Telephone: (850) 922-4539 · Facsimile: (850) 921-0783  
[FEC@myfloridalegal.com](mailto:FEC@myfloridalegal.com) · [www.fec.state.fl.us](http://www.fec.state.fl.us)



September 14, 2022

Karin Dennis, Chair  
Tea Time Political Association  
221 Arbor Lakes Circle  
Sanford, FL 32771

**RE: Case No.: FEC 22-069; Respondent: Tea Time Political Association**

Dear Ms. Dennis:

On March 9, 2022, the Florida Elections Commission received a complaint alleging your committee 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 2021 M11 reporting period.

However, prior to an investigation, you have the option to **resolve your case now by** signing a minor violation consent order and **paying a fine of \$50**, per Rule 2B-1.003, Florida Administrative Code, **rather than the potential \$1,000 per violation** 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. You and the Complainant will receive notice at least 14 days before any hearing at which your case is to be considered.

**Please contact Mattie Clay by phone at (850) 922-4539, by email at Mattie.Clay@myfloridalegal.com**, or at the address listed above, to accept this minor violation consent order.

Karin Dennis  
September 14, 2022  
Page 2  
FEC 22-069

If you choose not to resolve this case by consent order, an investigation will be conducted, the Commission will hold one or more hearings to determine whether the alleged violation(s) occurred and, if so, the amount of fine to be imposed upon you.

**Please note that all documents related to this matter will be mailed to the above address unless you notify us of a new address.**

For additional information, please refer to the "Frequently Asked Questions" section on the Commission's website.

Sincerely,

A handwritten signature in blue ink that reads "Tim Vaccaro". The signature is fluid and cursive, with a large initial "T" and a long, sweeping underline.

Tim Vaccaro  
Executive Director

TV/jd



**DIVISION OF ELECTIONS  
FEC NOTICE FORM**

To FEC from Division of Elections

REC'D: FL ELECTIONS COM  
9 MAR '22 PM 1:56

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**Name:** Tea Time Political Association  
**Account Number:** 79519  
**Chairperson:** Karin Dennis  
**Treasurer:** Karin Dennis  
**Registered Agent:** Karin Dennis

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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 as required by section 106.07(7), Florida Statutes.

The following report is outstanding after notification: 2021 M11

- Tea Time Political Association (79519) is a political committee registered with the Division of Elections. On June 17, 2021, the committee filed the DSDE 5 and DSDE 6 with the Division indicating that Karin Dennis was the chairperson.
- The 2021 M11 campaign treasurer's report was due on December 10, 2021. On December 13, 2021, the Division mailed Tea Time Political Association notification that the 2021 M11 campaign treasurer's report had not been filed.
- On December 28, 2021, the Division mailed Tea Time Political Association notification that the 2021 M11 campaign treasurer's report had not been filed.
- On January 11, 2022, the Division mailed Tea Time Political Association final notification with delivery confirmation that the 2021 M11 report had not been filed. (See attached letter and delivery confirmation.)
- The committee did not notify the Division of Elections prior to or on the prescribed reporting date for the 2021 M11 report that no report was to be filed.
- As of March 3, 2022, Tea Time Political Association has not filed the 2021 M11 report.

---

**Sent By:** Donna S. Brown *DSB*  
**Date:** March 3, 2022  
stb

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- Product Information** [v](#)

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FLORIDA DEPARTMENT OF STATE

Laurel M. Lee  
Secretary of State

DIVISION OF ELECTIONS

**Final Notice**  
**Delivery Confirmation:**

USPS TRACKING # **9114 9022 0078 9644 8029 03**  
& CUSTOMER RECEIPT For Tracking or inquiries go to USPS.com  
or call 1-800-222-1811.

January 11, 2022

Karin Dennis, Chairperson  
Tea Time Political Association  
221 Arbor Lakes Circle  
Sanford, FL 32771

PAC 79519

Dear Ms. Dennis:

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

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2021	M11	11/1/21 - 11/30/21

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,

Donna S. Brown, Chief  
Bureau of Election Records