STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

In Re: Robert Prater

TO: Robert Prater 9118 Palos Verdes Drive Orlando, FL 32825

Case No.: FEC 18-052

Claramargaret H. Groover 1124 Bryn Mawr Street Orlando, FL 32804

NOTICE OF HEARING (INFORMAL HEARING)

A hearing will be held in this case before the Florida Elections Commission on August 26, 2020 at 8:30 am, EST, or as soon thereafter as the parties can be heard.

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 GoToWebinar, 9-Digit Meeting ID 602-468-659, or via teleconference by dialing (866) 901-6455 and entering the meeting access code 515-462-864, 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>



Commission Meeting August 26, 2020at 8:30AM via GoToWebinar and OpenVoice

In order to participate in the public portion of the August 26, 2020, Florida Elections Commission meeting, please follow the instructions below:

- A. GoToWebinar Remote Video Conferencing
 - 1. Open your web browser and search GoToWebinar or enter www.gotowebinar.com
 - 2. Select Join A Webinar in the upper right corner of the website
 - 3. Enter the 9-digit Webinar ID: 602-468-659 And your email address
 - 4. Register your name and email address
 - 5. You will automatically join to the meeting as an attendee. Attendees are muted and can choose to their webcam.
- B. OpenVoice Teleconference
 - 1. Call 1-866-901-6455
 - 2. Enter Audio Access Code 515-462-864
 - 3. You will automatically join the meeting as an attendee. Attendees are muted.

While this is a public 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.

You can call or email our office of your intent to participate or of any questions you may have regarding this meeting. Please provide the case number(s) when contacting our office.

Thank you,

Commission Staff

STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

In Re: Robert Prater

TO: Robert Prater 9118 Palos Verdes Drive Orlando, FL 32825

Case No.: FEC 18-052

Claramargaret H. Groover 1124 Bryn Mawr Street Orlando, FL 32804

NOTICE OF HEARING (INFORMAL HEARING)

A hearing will be held in this case before the Florida Elections Commission on August 26, 2020 at 8:30 am, EST, or as soon thereafter as the parties can be heard.

<u>Please note that because of COVID-19, this will be a virtual meeting conducted by remote video conference only. Prior to the meeting, the Commission office will send you a set of participant instructions, which will include login information for the meeting. Please be advised that the Commission will consider multiple cases that day, so you will need to wait until your case is considered. If you have questions, please contact Commission staff at (850) 922-4539.</u>

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 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.

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: Robert Prater

Case No.: FEC 18-052

TO: Robert Prater 9118 Palos Verdes Drive Orlando, FL 32825

Claramargaret H. Groover 1124 Bryn Mawr Street Orlando, FL 32804

NOTICE OF HEARING (INFORMAL HEARING)

A hearing will be held in this case before the Florida Elections Commission on, March 24, 2020 at 1:00 p.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.

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 March 9, 2019 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.

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STATE OF FLORIDA SLECTIONS COMMISSION

STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

Florida Elections Commission, Petitioner,

Case No.: FEC 18-052

Robert Prater, Respondent.

v.

ORDER OF PROBABLE CAUSE

THIS MATTER was heard by the Florida Elections Commission (Commission) at its regularly scheduled meeting on November 19, 2019, in Tallahassee, Florida.

On September 6, 2019, 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(s):

THIS SPACE INTENTIONALLY LEFT BLANK

<u>Count 1:</u>

On or about February 16, 2018, Robert Prater violated Section 106.143(1)(a), Florida Statutes, when he paid for and published a political advertisement that contained express advocacy but did not include the required statutory disclaimer.

DONE AND ORDERED by the Florida Elections Commission on November 19, 2019.

Joni Alexis Poitier, Vice Chair Florida Elections Commission

Copies furnished to: Stephanie J. Cunningham, Assistant General Counsel Robert Prater, Respondent Claramargaret H. Groover, 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.

STATE OF FLORIDA FLORIDA ELECTIONS COMMISSION

In Re: Robert Prater

Case No.: FEC 18-052

TO: Robert Prater 9118 Palos Verdes Drive Orlando, FL 32825

Claramargaret H. Groover 1124 Bryn Mawr Street Orlando, FL 32804

NOTICE OF HEARING (PROBABLE CAUSE DETERMINATION)

A hearing will be held in this case before the Florida Elections Commission on, **November 19, 2019 at 9:00 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.

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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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See further instructions on the reverse side.

<u>Tim Vaccaro</u>

Executive Director Florida Elections Commission November 1, 2019 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.

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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: Robert Prater

Case No.: FEC 18-052

STAFF RECOMMENDATION FOLLOWING INVESTIGATION

Pursuant to Section 106.25(4)(c), Florida Statutes, undersigned staff counsel files this written recommendation for disposition of the complaint in this case recommending that there is **probable cause** to charge Respondent with violating **Section 106.143(1)(a)**, Florida Statutes. Based upon a thorough review of the Report of Investigation submitted on June 4, 2019, the following facts and law support this staff recommendation:

1. On February 20, 2018, the Florida Elections Commission ("Commission") received a sworn complaint from Claramargaret H. Groover ("Complainant"), alleging that Robert Prater ("Respondent") violated Chapter 106, Florida Statutes.

2. Respondent was a 2018 candidate for Chair of the Orange County School Board. (ROI Exhibit 9)¹

3. By letter dated December 18, 2018, the Executive Director notified Respondent that Commission staff would investigate the following statutory provision:

Section 106.143(1)(a), Florida Statutes: Respondent, a 2018 candidate for Chair of the Orange County School Board, paid for and distributed a political advertisement that contained express advocacy but did not include a proper disclaimer.

4. On December 27, 2017, Respondent acknowledged that he had been provided access to Chapter 106, Florida Statutes. (ROI Exhibit 9)

5. Complainant alleged that Respondent violated Florida's election laws by failing to include a proper disclaimer on a political advertisement.

6. The political advertisement at issue is a website which contains language that expressly advocates for the election of a candidate: "VOTE FOR ORANGE COUNTY SCHOOL BOARD CHAIR ROBERT PRATER." (ROI Exhibit 1, page 2) The printout of the website does not contain a political disclaimer but rather states that the Campaign to Elect Robert Prater is a 501(c)(3) non-profit organization. (ROI Exhibit 1)

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

7. Complainant stated that the footer of each webpage states, "Political advertisement paid for and approved by the candidate." (ROI Exhibit 2) However, Complainant did not provide a printout of the webpages that shows the actual political disclaimer.

8. Respondent stated that he created the website with his wife, which included a Donorbox account, and modeled it after another candidate's website. (ROI Exhibit 5; ROI Exhibit 6, page 1) He stated that he did not know where the 501(c)(3) wording came from but that he believes his website was hacked. (ROI Exhibit 6, page 1; Attachment A) He also stated that he had the proper disclaimer at the bottom of each webpage and provided a copy of his website and other campaign literature. (ROI Exhibit 6, page 1; ROI Exhibit 7) The website and campaign literature contain the following deficient disclaimer: "Paid for and approved by Campaign to Elect Robert Prater." (ROI Exhibit 7)

9. Candidates are required to prominently mark their political advertisements with the exact political disclaimer language as set forth under Section 106.143(1)(a), Florida Statutes. The *Candidate & Campaign Treasurer Handbook* also references the statutory requirement and provides examples of political disclaimers for non-incumbent candidates running for nonpartisan office. Respondent was advised to download a copy of the *Handbook* by his filing officer. (ROI Exhibit 8, page 2)

10. Respondent paid for and published a political advertisement that did not prominently state, "Political advertisement paid for and approved by <name of candidate>, for <office sought>" or "Paid by <name of candidate>, for <office sought>."

11. "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).

12. The facts set forth above show that Respondent was a 2018 candidate for Chair of the Orange County School Board. Respondent paid for and published a political advertisement that did not include the required statutory disclaimer.

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 February 16, 2018, Robert Prater violated Section 106.143(1)(a), Florida Statutes, when he paid for and published a political advertisement that contained express advocacy but did not include the required statutory disclaimer.

Respectfully submitted on September <u>6</u>, 2019.

Stephanic J. Cunningham Assistant General Counsel

I reviewed this Staff Recommendation this $\underbrace{6}^{\text{m}}$ day of September 2019.

____ earo

Tim Vaccaro **Executive Director**

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Stephanie Cunningham

From: Sent: To: Subject: Prater, Robert A. <robert.prater@ocps.net> Tuesday, June 25, 2019 10:15 AM Stephanie Cunningham FEC 18-052

Dear Ms. Cunningham:

Re: Case No: FEC 18-052

It has been brought to my attention you have been assigned my case. I wanted to add a few points to this case that I hope will help close out this issue.

First, I received the packet on June 13, 2019 in the mail. I've been requesting for the alleged documents or exhibits is what they are being call now, from the time this allegation was brought to my attention. This is why I'm adding or provide information that I couldn't see before, again this is the first time I'm seeing these documents.

The Gentleman (Cole Kekelis) that spoke to me first concerning this issue was more interested in getting the 250\$ out of me than finding out the truth.

Exhibit 1-Page 1- only thing on this page that I made was the picture, however this is the picture from my facebook page, not the web-site. The wording I never had or used anywhere.

Exhibit 1-Page 2- I used Pay-Pal and still have and open account to this day for personal use.

Exhibit 1-Page 3 & 4- None of this information is even close to being right. In 2018 when I was running, Florida wasn't rank 27th. Teacher average salary weren't 41,125 it was actually 47,500 at the time. I never campaign on ESE issues and did even attend the ESE debate when they had it for the seat I was running for. I'm not sure what safety improvements it's referencing to, what I can tell you is I would never use a reference from 2012-2013 school year when the Parkland school shooting had just happen.

Last: I wouldn't underline the section starting with "Your Contribution and Prater would end with and "s". Also, I've never had a "twitter account" nor have I ever been non-profit for anything.

Here is the type of data I would use in my campaign http://www.nea.org/assets/docs/2017 Rankings and Estimates Report-FINAL-SECURED.pdf

Attachment A

It's always 2 years behind, one of the ways they keep teacher salaries down.

Rankings And Estimates Report final 2017 Title & TOC

www.nea.org

Teacher Salary The U.S. average الأكتر school teacher salary for 2015–16 was \$58,353. State average teacher salaries ranged from those in New York (\$79,152), California (\$77,179), and Massachusetts

In conclusion, I started believing my site had been hacked, but never 100% sure. After finally reviewing all of these documents, I am 100% sure that I was hacked and I wouldn't be surprise if the only person who ever filed a complaint against me was the one behind the hack.

2

Please dismiss Case No: FEC 18-052

Robert Prater

The information contained in this e-mail message is intended solely for the recipient(s) and may contain privileged information. Tampering with or altering the contents of this message is prohibited. This information is the same as any written document and may be subject to all rules governing public information according to Florida Statutes. Any message that falls under Chapter 119 shall not be altered in a manner that misrepresents the activities of Orange County Public Schools. [References: Florida State Constitution I.24, Florida State Statutes Chapter 119, and OCPS Management Directive A-9.] If you have received this message in error, or are not the named recipient notify the sender and delete this message from your computer.



Stephanie Cunningham

From: Sent: To: Subject: Prater, Robert A. <robert.prater@ocps.net> Tuesday, June 25, 2019 10:15 AM Stephanie Cunningham FEC 18-052

Dear Ms. Cunningham:

Re: Case No: FEC 18-052

It has been brought to my attention you have been assigned my case. I wanted to add a few points to this case that I hope will help close out this issue.

First, I received the packet on June 13, 2019 in the mail. I've been requesting for the alleged documents or exhibits is what they are being call now, from the time this allegation was brought to my attention. This is why I'm adding or provide information that I couldn't see before, again this is the first time I'm seeing these documents.

The Gentleman (Cole Kekelis) that spoke to me first concerning this issue was more interested in getting the 250\$ out of me than finding out the truth.

Exhibit 1-Page 1- only thing on this page that I made was the picture, however this is the picture from my facebook page, not the web-site. The wording I never had or used anywhere.

Exhibit 1-Page 2- I used Pay-Pal and still have and open account to this day for personal use.

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It's always 2 years behind, one of the ways they keep teacher salaries down.

Rankings And Estimates Report final 2017 Title & TOC

www.nea.org

Teacher Salary The U.S. average public school teacher salary for 2015–16 was \$58,353. State average teacher salaries ranged from those in New York (\$79,152), California (\$77,179), and Massachusetts

In conclusion, I started believing my site had been hacked, but never 100% sure. After finally reviewing all of these documents, I am 100% sure that I was hacked and I wouldn't be surprise if the only person who ever filed a complaint against me was the one behind the hack.

Please dismiss Case No: FEC 18-052

Robert Prater

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FLORIDA ELECTIONS COMMISSION REPORT OF INVESTIGATION Case No.: FEC 18-052

Respondent: Robert Prater

Complainant: Claramargaret H. Groover

On February 20, 2018, the Florida Elections Commission ("Commission") received a sworn complaint alleging that Respondent violated Chapter 106, Florida Statutes. Commission staff investigated whether Respondent violated the following statute:

Section 106.143(1)(a), Florida Statutes, failure of a candidate who made an expenditure for and published a political advertisement before the election to prominently mark the advertisement with the required disclaimer.

I. Preliminary Information:

1. Respondent was a 2018 candidate for the office of School Board Chair for Orange County. He was eliminated in the primary election, which was held on August 28, 2018.

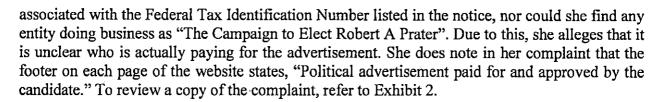
2. Complainant is a resident of Orlando, Florida.

II. Alleged Violation of Section 106.143(1)(a), Florida Statutes:

3. I investigated whether Respondent violated this section of the election laws by paying for and distributing a campaign advertisement that contained express advocacy but did not include a proper political disclaimer.

4. Complainant alleges Respondent was soliciting campaign contributions through a website which did not make clear who was paying for the advertising. She attached copies of the website donor page, that is headed with an image of Respondent, and the words, "Vote for Orange County School Board Chair Robert Prater. Vote for a leader who will work for our students, parents, teachers, and administrators." Wording to the side of this image states, "Campaign to Elect Robert Prater. A donation to our campaign means we are one step closer to putting a teacher in the School Board Chair. Your contribution will go a long way in continuing to spread the word across our School District. Helping our campaign will help elect a leader who will work for our students, parents, teachers, and administrators. We are a 501(c)(3) non-profit organization. The Campaign to Elect Robert A Prater, EIN is 82-3886419. All contributions are non-tax deductible. No goods or services will be provided in exchange for this contribution." To review a copy of the website donor page, please refer to Exhibit 1.

5. Complainant also alleges that she was not able to identify any Florida entity



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6. I researched the Donorbox website, which states that it is a "powerful fundraising software" that "seamlessly embed(s) to your website", accepts monthly recurring donations and takes "payments via cards, Apple Pay, low fee ACH bank transfers, and Paypal". Example cases include nonprofit fundraising as well as political fundraising. The Donorbox website allows prospective clients to view "live examples" of websites using the Donorbox fundraising software. A website for a candidate running for mayor of Louisville is used as a live example under the "Political Fundraising" Donorbox link. This page looks similar to Respondent's page, however, there is no notification or disclaimer language as noted on Respondent's page. To review a copy of the political fundraising example page, please refer to Exhibit 3.

7. A website for a nonprofit organization is used as a live example under the "Nonprofit Fundraising Solution" Donorbox link. This page looks like Respondent's campaign page, and also uses notification language that is similar to what was used on Respondent's Donorbox page. To review a copy of the nonprofit fundraising solution example page, please refer to Exhibit 4.

8. A search online for the Employer Identification Number (EIN) listed in the disclaimer found on Respondent's donor page did not result in any matches and does not appear to be a valid EIN.

9. Respondent sent a written response to our office on July 31, 2018. In the written response, he indicated that this was his first campaign, and everything was run by himself and his wife. He stated, "The website donor page that is in question was created by us with little background in how to actually conceive it. My wife decided to go through other similar campaigns being held to "follow in their footsteps". Though we have spent countless hours trying to figure out where we may have gotten the information we thought was necessary to add to the disclaimer, it is evident now that that disclaimer was a mistake. Since finding no such disclaimer on any other candidate sites we are not sure if it was originally tied into the creation of the website www.voterobprater.com or the conception of the Donorbox account itself." To review a copy of the July 31, 2018 written response, refer to Exhibit 5.

10. Respondent also stated in the July 31, 2018 written response that "We have since taken down the web address as well as the Donorbox account. We believe the misunderstanding stems from the "Donorbox" account that was set up. Though going through each line of the account not sure where this non-profit line came into play, as we have paid fees for any donations coming through this site"; Exhibit 5.

11. In a telephone interview on May 20, 2019, Respondent stated that he and his wife had used Nancy Robinson, another candidate for Orange County School Board's website as a template when creating his campaign site. He does not know where the non-profit language came from, as it was not in the example website that they used as the template. The best that he could figure was that his site may have been hacked, or there was a malfunction with the Donorbox link. He stated that he was always careful with making sure the proper disclaimer was on all his advertising, and that there was a disclaimer on his website, found under this name at the top of the home page, and at the bottom of his website. The miscellaneous 501(c)(3) language was attached to the Donorbox link only. To review a copy of the investigative telephone log, refer to Exhibit 6.

12. Respondent's filing history indicates the campaign made one \$54.00 expenditure, and then six additional \$29.00 expenditures to Online Candidate/Daley Professional Web Solutions for website hosting, spending a total of \$228.00 to maintain his campaign web site during the election.

13. On June 4, 2019, Respondent sent an email, and attached copies of three political advertisements that displayed the political disclaimer that was used on his website. All three advertisements displayed the same disclaimer stating, "Paid for and approved by Campaign to Elect Robert Prater". To review the three political advertisements, refer to Exhibit 7.

14. There is no record that Respondent has previously violated this section of the election laws.

III. FEC History:

15. Respondent has had no prior cases before the Commission.

Conclusion:

16. In the telephone interview on May 20, 2019, Respondent stated he had read Chapter 106, Florida Statutes; Exhibit 6.

17. On March 22, 2019, Cindy Clark, Director of Elections for the Supervisor of Elections for Orange County returned a completed questionnaire-affidavit, stating that Respondent was advised to download copies of Chapter 106, Florida Statutes and the *Candidate and Campaign Treasurer Handbook*. To review a copy of the March 22, 2019 questionnaire-affidavit, refer to Exhibit 8.

18. On December 27, 2017, Respondent filed his Statement of Candidate for Orange School Board Chair acknowledging that he had been provided access to read and understand the requirements of Chapter 106, Florida Statutes. To review a copy of the Statement of Candidate form, refer to Exhibit 9.

Respectfully submitted on June 4, 2019.

Samantha Spore Investigation Specialist

Current address of Respondent	Current address of	f Complainant	
Mr. Robert Prater 9118 Palos Verdes Drive Orlando, FL 32825	Ms. Claramargaret I 1124 Bryn Mawr St Orlando, FL 32804		
Name and Address of Filing Officer:		a - ,	
The Honorable Bill Cowles Supervisor of Elections 119 West Kaley Street Orlando, FL 32856			

Copy furnished to: Mr. David Flagg, Investigations Manager

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FLORIDA ELECTIONS COMMISSION REPORT OF INVESTIGATION Robert Prater -- FEC 18-052

	LIST OF EXHIBITS	
Exhibits #s	Description of Exhibits	
Exhibit 1	Copy of Website Donor Page	
Exhibit 2	Copy of Complaint	
Exhibit 3	Donorbox Political Fundraising Example Page	
Exhibit 4	Donorbox Nonprofit Fundraising Solution Example Page	
Exhibit 5	July 31, 2018 Written Response	
Exhibit 6	Investigative Telephone Log	
Exhibit 7	it 7 Political Advertisements with Disclaimers	
Exhibit 8	March 22, 2019 Questionnaire-Affidavit	
Exhibit 9	Statement of Candidate Form	





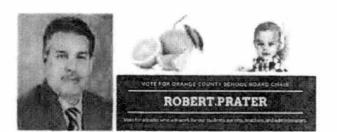
Campaign to Elect Robert Prater



A domation to our calmpage means we are one step closer to planting a teacher so the school Board Chain. Your contribution will go a long way in continuing to spread the word across out School District. Thething our compage will be prefer to reader, who will waits for our students. Incomes there are according to the school of the school of the school.

Vet 40° a 50° (CSR) non-providing and along TBe campaign to steer Robert A Shate, Ets. 5.82, 3886415. All contributions are non-tax deductible, but gradieur security will be provided in exchange for this contribution.





Page 3 of webiche. www.uoterobprater.com

Campaign to Elect Robert Prater

	\$10
0	\$25
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0	\$100
	\$250
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21

5

Next

Powered by DonorBox

EXHIBIT 1 page 2 of 4 @

Page 6 of 9

5 Reasons Orange County Needs Robert Prater in the School Board Chair.

Page 3 of whethere

Orange County is falling behind in education

- Despite staying in the top ten for the past few years,
 Florida's "Quality Counts" place has recently
 plummeted # 28 in the national ranking.
- Orange county public schools ranks #27 in Florida with an overall grade of B, making our lack of focused education a culprit in Florida's lower ranking.

 We have a severe shortage of highly qualified teachers

- OCPS teachers working conditions are ranked at the bottom with a C-. There is *no* lower grade. How can we secure qualified teachers if we're not providing them with a viable work environment?
- The average teacher salary \$41,125
 (\$30,126-\$51,302). 39 Florida counties have higher salaries. Why aren't we compensating our educators for their hard work?

Orange County ESE Programs

- After missing goals for four years in a row, Orange County has been placed near the bottom of Florida's list.
- Special education needs are not being met and parent complaints are not being expedited and resolved.

Our schools continuous Safety Improvements

 According to information from 2012-2013 (obtained from the Department of Education) Orange County is home to 11 of the 25 most departure schools, depait

- years.
 - Our School System ranks at #32 in school district safety reports.

Page 3 of website

 The importance of an EDUCATOR as the CHAIRMAN of our Education BOARD

- The schoolboard should be focused on schools, so why is it that it's filled with politicians and lawyers instead of people who *know* what it takes to run a school?
- Poor education affects everyone in the county: property values go down, crime goes up, we have less qualified workers in the workforce, and taxes are raised as a result.

Your contribution can turn the tides for the Prater campaign and change the future of Orange County education. Build a brighter future for our children by putting an educator in the School Board Chair.

Facebook Lir din Twitter

We are a 501(c)(3) non-profit organization. The campaign to Elect Robert A Prater, EIN is 82-3886419. All contributions are non-tax deductible. No goods or services will be provided in exchange for this contribution.

NARRATIVE STATEMENT OF ALLEGED VIOLATIONS OF THE FLORIDA ELECTION CODE BY CANDIDATE ROBERT A. PRATER, CANDIDATE FOR ORANGE COUNTY SCHOOL BOARD CHAIR

Please consider this statement as part of the Complaint in response to Paragraph 3 setting forth the Alleged Violations:

Section 106.143(1)(c), *Florida Statutes*, requires that a candidate must "state the name and address of the persons paying for the advertisement."

Mr. Prater solicits campaign contributions through a website at <u>http://voterobprater.com/</u>, page 3, which gives the following notice:

We are a 501(c)(3) non-profit organization. The campaign to Elect Robert A Prater, (sic) ElN is 82-3886419. All contributions are non-tax deductible. No goods or services will be provided in exchange for this contribution.

A copy of the screen shot is included with the Complaint and this Narrative as Exhibit "1." First, I have been unable to locate any entity authorized to do business either as a properly formed Florida corporation, a limited liability company, or an entity doing business as "The Campaign to Elect Robert A Prater" with a properly filed Fictitious Name Affidavit with the Florida Department of State, Division of Corporations. Second, I have not been able to identify any Florida entity associated with the Federal Tax Identification Number listed.

Is Mr. Prater paying for the advertisement personally? Is a properly organized and documented campaign organization paying? If so, what is the legal name of the entity? Is the so-called 501(c)(3) paying for the advertisement? If the answer to the last question is "yes" such involvement in a political campaign would expressly violate a condition of the IRS ruling creating such a tax exempt entity.

- Why does the advertisement say that "we" are a 501(c)(3) non-profit organization, a tax exempt designation, and then declare that contributions are non-tax deductible?
- Who is actually paying for the advertisement? The footer on each webpage states, "Political advertisement paid for and approved by the candidate."
- Exhibits "2", "3", and "4" are a composite print-out of Mr. Prater's website, page 3, donor page.
- Exhibit "5" is the Google index listing the donor page and showing this misrepresentation.

You may contact me at chgroover@grooverlawfirm.com and by phone at (407) 808-7656.

Respectfully submitted,

Caraman & ramargaret H. Groov

EXHIBIT

Angela





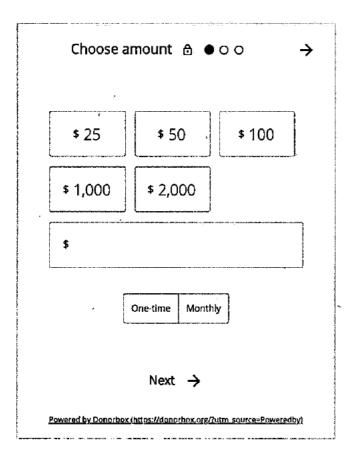
Louisville Mayor 2018

ABOUT (/ABOUT) TAKE ACTION (/TAKE-ACTION) CONTACT (/CONTACT)

DONATE (/DONATE)

DONATE TO THE ANGELA LEET FOR MAYOR CAMPAIGN

YOUR CONTRIBUTION IS APPRECIATED!



Prefer to pay by check?

Please make payable to "Angela Leet for Mayor" and mail to:

Angela Leet for Mayor 3099 Breckenridge Lane Suite 105 Louisville, KY 40220

*Law requires we ask for your employer and occupation. If you don't have an employer or are retired, put N/A, and if you are self-employed put "self-employed" in employer and describe your occupation.

*Corporate Cards used to make donations are prohibited. Political Contributions are not tax deductible. \$2,000 per person per election cycle maximum contribution allowed by law. Contributions from Corporations and foreign nationals are prohibited.

EXHIBIT

LATEST TWEETS

MAILING ADDRESS:

CONTACT

TOREST TOREST LANINA CLUB	· · ·	
LFSC Annual Giving Campaign 2019		
Choeseamo⊔iat ⊕ c ⊙ (⊊ ⇒.	S500 1 \$15,000 Raised Donation Goal	
• \$1,500 Heroes Club	Annual Fund	
 ⁵ 1,000 Green and Yellow Club ⁵ 500 	The Lake Forest Swim Club is a 501(c)3 charitable organization, EIN 36- 3396035. Donations to the club are tax deductible under current tax codes, absent any limitations on deductibility applicable to a particular	
Gold Medal Club	taxpayer. Gifts must be received by December 31st to be eligible for a 2019 tax deduction.	
Silver Medal Club		
S 100 Bronze Medal Club		
Ci \$50 LFSC Fan Club		
O S . Enter custom amount		
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Area of greatest need		

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EXHIBIT 4

Campaign to Elect Robert Prater
 For Orange County School Board Chair
 9118 Palos Verde Drive
 Orlando, FL. 32825
 voterobprater@gmail.com

RE: Case No.: FEC 18-052:; Respondent: Robert Prater

To Ms. Erin Riley

After receiving Complaint case FEC 18-052 we tried very hard to find how this came about and from where. This School Board campaign is my first. It is a true grassroots operation with very little money. Being run by just myself and my wife. Unfortunate in this event it is evident we needed a bit more help.

The website donor page that is in question was created by us with little background in how to actually conceive it. My wife decided to go through other similar campaigns being held to "follow in their footsteps". Though we have spent countless hours trying to figure out where we may have gotten the information we thought was necessary to add to the disclaimer, it is evident now that that disclaimer was a mistake. Since finding no such disclaimer on any other candidate sites we are not sure if it was originally tied into the creation of the website <u>www.voterobprater.com</u> or the conception of the Donorbox account itself.

We have since taken down the web address as well as the Donorbox account.

We believe the misunderstanding stems from the "Donorbox" account that was set up. Though going through each line of the account not sure where this non-profit line came into play, as we have paid fees for any donations coming through this site. As of todays date 7/30/2018 and last reports filed on record with the Orange County Supervisors of Elections Office we currently have \$4.00 left in account.

EXHIBIT

Please let us know if there is anything further needed on our part.

Sincerely,

Robert Prater



FLORIDA ELECTIONS COMMISSION PHONE LOG Case No.: FEC 18-052

Respondent: Robert Prater Complainant: Claramargaret H. Groover

1. Date and time: 05/20/19- 2:40 PM

Name: Respondent

Phone #: 407-283-9142

Summary: I called and spoke with Respondent. He verified that this number was the best number to reach him on. He stated that his wife helped him with setting up some of the campaign early on. He mentioned that he and his wife used another candidate's website (Nancy Robinson) as a sort of template for creating his campaign site. They used the same company she used (Donorbox) and copied the formatting from her page. He stated that he did not know where the 501(c)(3) wording came from, and when they received a copy of the complaint in the mail, he and his wife went back through all of their paperwork and could not find where this wording was generated from. He stated he does not even know how to register as a non-profit organization, but he is aware that a campaign does not fall under the 501(c)(3) guidelines. He explained that he has read Chapter 106, Florida Statutes, and knows how and when to use the proper disclaimer. He also stated that he did have the proper disclaimer on his website, under his name and at the bottom of the web page, and that he was very aware that the disclaimer should be on postcards, banners, yard signs and all advertising. He stated he has wondered if his campaign website had been hacked, or if there had been a malfunction somewhere, that added the non-profit language to his Donorbox link, as this was the only area where the miscellaneous language was found. He stated that if I had any further questions, that I could call him on this particular number.

Memo to File? No Entered by: S. Spore

 Date and time: 06/03/19- 4:27 PM Name: Respondent Phone #: 407-283-9142

Summary: I called to ask Respondent if he had any copies of his campaign literature that he could send me, so that I could see the disclaimer that he used. I reached a voicemail box, and left him a message, asking him to return my call. I left my name, telephone number and extension. Respondent returned my call at 4:34 PM. He stated that he did have a copy of one of his political advertisements that showed the disclaimer his campaign used for the website and all other advertising, and that he would be able to send me a copy of this image tomorrow by email. He asked me to send him an email to <u>robert.prater@ocps.net</u>, and he would reply back to me via that message, with the image attached. I thanked him for his assistance in this matter.

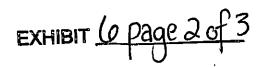
Memo to File? No Entered by: S. Spore

3. Date and time: Name:

EXHIBIT 6 page 1 of 3

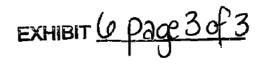
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- 4. Date and time: Name: Phone #: Summary: Memo to File? No Entered by:
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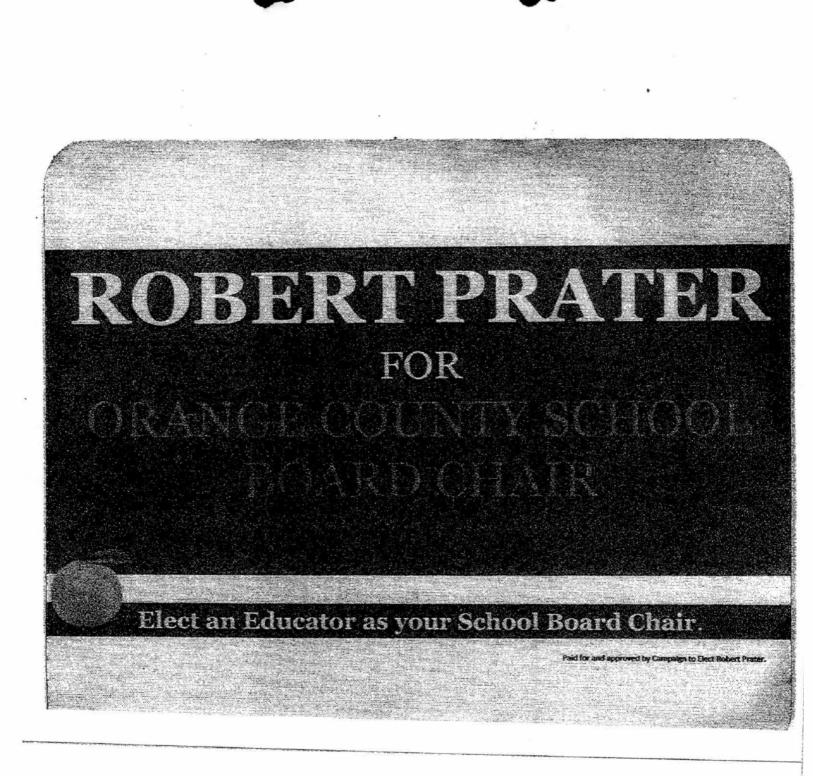
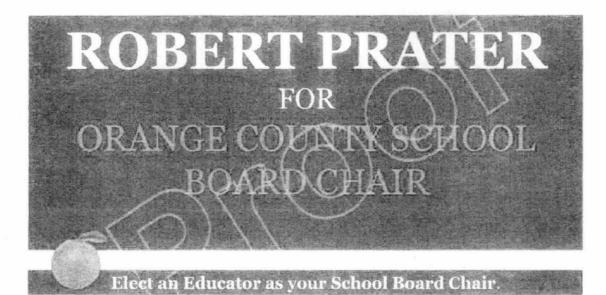


EXHIBIT 7 page lof3



Paid for and approved by Campaign to Elect Robert Prater

EXHIBIT 7 page 2 of 3

ROBERT PRATER FOR ORANGE COUNTY SCHOOL BOARD CHAIR

Elect an Educator as your School Board Chair



About the Candidate

Paid for and approved by Campaign to Elect Robert Prater.

Robert Prater, current dean and part of the leadership team at Oak Hill Elementary, has been a committed educator and advocate for almost fifteen years. Roberts OCPS career began as a substitute back in 2005. He continued working for OCPS as a paraprofessional while he completed his degree in Education attending Nova Southeastern University.

Once in the classroom he excelled in teaching and connecting with his students and their families. He took pride watching each student develop academic gains. He still gets recognized today by students and their parents who have never forgotten his devotion and passion towards their learning.

He has served as the leader on the Faculty Advisory and School Advisory Committees. He has worked with PTA on many projects. In 2017 he was involved with the new build of Oakhill Elementary as the FF&E Coordinator.

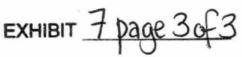
Robert has loved his profession so much that he has also involved himself with night classes, teaching, Orange County citizens who are second language learners the basic skills for understanding the English language.

Mr. Prater is also the Partners in Education coordinator where he works with community leaders to finds ways to help the students at Oak Hill Elementary.

He has spent many years as a community volunteer coaching and umpiring little league teams. He invested his time in cultivating productive student athletes as he assisted coaching the JV Baseball Team from Colonial High School for two seasons. He has devoted himself not only to his schools within Orange County, but also to the employees of Orange County Public Schools working on the Fringe Benefit committee which helped offer the best health care coverage the county could provide.

Essential factors such as retaining our highly qualified teachers, school administrators and support staff would strengthen our foundation. Extending our reach to the community through transparency and involvement efforts would impact every school and community. Having the current educational experience and background to provide real insight into today's educational issues.

www.Voterobprater.com



AFFIDAVIT OF FILING OFFICER COWLES 811.L 4302 OF RV1308 OF FLEUIR RANGE COUNTY / L Case Number: FEC 18-052

STATE OF FLORIDA **County of Orange** indu Clas

2019 MAR 22 A 9 35

Bill Cowles, being duly sworn, says:

1. This affidavit is made upon my personal knowledge.

2. I am of legal age and competent to testify to the matters stated herein. I am currently

employed by Supervisor of Elections Director of Elections Orcial Co., Fr

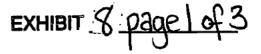
3. Please provide copies of the listed items from the following candidate's campaign file: **Robert Prater**.

Check	ITEM
\square	The Statement of Candidate form for 2018 campaign.
	Appointments of Treasurers and Designation of Campaign Depository form for 2018 campaign.
	Campaign treasurer's reports, waivers, and amendments for the 2018 campaign.
	Addendum requests and proof of compliance for the 2018 campaign.

4. Please check each item provided to the candidate and list the date that the item was provided.

Check	DATE
	Chapter 106, Florida Statutes
	Candidate and Campaign Treasurer Handbook Please indicate
	Other:1

¹ Any local publications relative to the Election laws that may have been provided in lieu of the Candidate and Campaign Treasurer Handbook published by the Division of Elections. If your office published the item(s), please send a copy of the item(s) with the affidavit. You do NOT need to send copies of Chapter 106, Florida Statutes, and/or the Candidate and Campaign Treasurer Handbook.





5. Relative to Chapter 106, *Florida Statutes* and the *Candidate and Campaign Treasurer Handbook*, how are these publications provided to the candidate?

- o Publications are given directly to the candidate.
- Publications are available in the office, candidates are advised to pick-up the publications for themselves.
- X Candidates are advised to download copies of the publications from our website or the Division of Elections' website.
- o Other, please explain.

6. Did your office offer any candidate workshops or training seminars prior to the August 28, 2018 primary election? Yes or No. If yes, please list all workshops/training seminars that were attended by the candidate, along with the date of attendance. If a staff member attended for the candidate, list his/her name and position. If available, please attach a copy of any attendance sheets from the workshops/training seminars and if available, please provide a copy of the syllabus and outline for the workshops/seminars.

Sid NOT attend, see sign-in

7. Does your office have any record of Robert Prater having sought elective office within your jurisdiction prior to the 2018 election? \Box Yes or \swarrow No. If yes, please list the previous office(s) he ran for, the date(s) of the election(s), and the result(s) of the election(s).

8. Does your office have any record of Robert Prater having been named as a chairperson or campaign treasurer of a political committee or electioneering communication organization within your jurisdiction? \Box Yes or \bigstar No. If yes, please list the name(s) of the committees.

~

EXHIBIT Space 2 of 3

Aff of FO Comm (11/18)

^{9.} Did you or any member from your staff have any conversations with Robert Prater concerning a provision of Chapter 106, Florida Statutes, at any time during his 2018 campaign? Yes or No. If yes, please indicate whether the conversation was in person, in writing, or by telephone and the subject matter of the conversation. If applicable, please provide copies documenting the discussion.

I SWEAR OR AFFIRM THAT THE INFORMATION CONTAINED IN THIS DOCUMENT IS COMPLETE AND ACCURATE TO THE BEST OF MY KNOWLEDGE.

Signature of Affiant

Sworn to (or affirmed) and subscribed before me this $\underline{\mathcal{A}} \underline{\mathcal{C}}^{\mathcal{M}}$ day of March 2019.

Cл me

Signature of Notary Public- State of Florida Print, Type, or Stamp Commissioned Name of Notary Public

Notary Public State of Florida **Michelle Torres** My Commission FF 908177 Expires 08/09/2019

Personally Known or Produced Identification Type of Identification Produced:

Case investigator: S. Spore

EXHIBIT 8- Page 3 of

OFFICE USE ONLY STATEMENT OF CANDIDATE 2017 LEC 2" P 4:21 (Section 106.023, F.S.) (Please print or type) -1, Robert Allen Prater candidate for the office of Orange School Board Chair have been provided access to read and understand the requirements of Chapter 106, Florida Statutes. Х Signature of Candidate Each candidate must file a statement with the qualifying officer within 10 days after the Appointment of Campaign Treasurer and Designation of Campaign Depository is filed. Willful failure to file this form is a first degree misdemeanor and a civil violation of the Campaign Financing Act which may result in a fine of up to \$1,000, (ss. 106.19(1)(c), 106.265(1), Florida Statutes). DS-DE 84 (05/11)

EXHIBIT

Samantha Spore

From:	Prater, Robert A. <robert.prater@ocps.net></robert.prater@ocps.net>
Sent:	Tuesday, June 4, 2019 3:50 PM
То:	Samantha Spore
Subject:	Re: Thank you!
Attachments:	Paid for and Approved be Campaign to Elect Robert Prater.pdf

Here you go, I hope this help resolve this issue.

Mr. Prater

From: Samantha Spore <Samantha.Spore@myfloridalegal.com> Sent: Monday, June 3, 2019 4:45:44 PM To: Prater, Robert A. Subject: Thank you!

A CAUTION: This email originated from outside of Orange County Public Schools. Do not click links or open attachments unless you know the content is safe.

Mr. Prater,

Thank you for speaking with me today. I appreciate all your help!

Samantha Spore

Investigation Specialist Florida Elections Commission The Collins Building, Ste. 224 107 West Gaines Street Tallahassee, FL 32399-1050 PH: 850-922-4539 ext. 110 Fax: 850-921-0783 www.fec.state.fl.us

The information contained in this e-mail message is intended solely for the recipient(s) and may contain privileged information. Tampering with or altering the contents of this message is prohibited. This information is the same as any written document and may be subject to all rules governing public information according to Florida Statutes. Any message that falls under Chapter 119 shall not be altered in a manner that misrepresents the activities of Orange County Public Schools. [References: Florida State Constitution 1.24, Florida State Statutes Chapter 119, and OCPS Management Directive A-9.] If you have received this message in error, or are not the named recipient notify the sender and delete this message from your computer.

ROBERT PRATER FOR ORANGE COUNTY SCHOOL BOARD CHAIR

Elect an Educator as your School Board Chair.

About the Candidate

Paid for and approved by Campaign to Elect Robert Prater.



Robert Prater, current dean and part of the leadership team at Oak Hill Elementary, has been a committed educator and advocate for almost fifteen years. Roberts OCPS career began as a substitute back in 2005. He continued working for OCPS as a paraprofessional while he completed his degree in Education attending Nova Southeastern University.

Once in the classroom he excelled in teaching and connecting with his students and their families. He took pride watching each student develop academic gains. He still gets recognized today by students and their parents who have never forgotten his devotion and passion towards their learning.

He has served as the leader on the Faculty Advisory and School Advisory Committees. He has worked with PTA on many projects . In 2017 he was involved with the new build of Oakhill Elementary as the FF&E Coordinator.

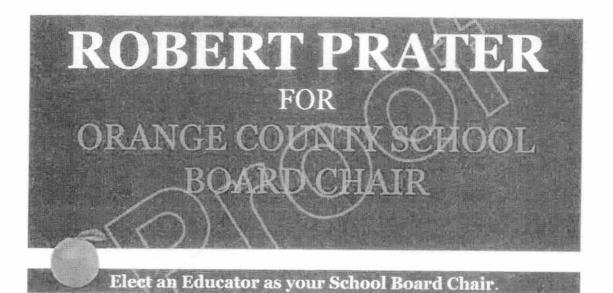
Robert has loved his profession so much that he has also involved himself with night classes, teaching, Orange County citizens who are second language learners the basic skills for understanding the English language.

Mr. Prater is also the Partners in Education coordinator where he works with community leaders to finds ways to help the students at Oak Hill Elementary.

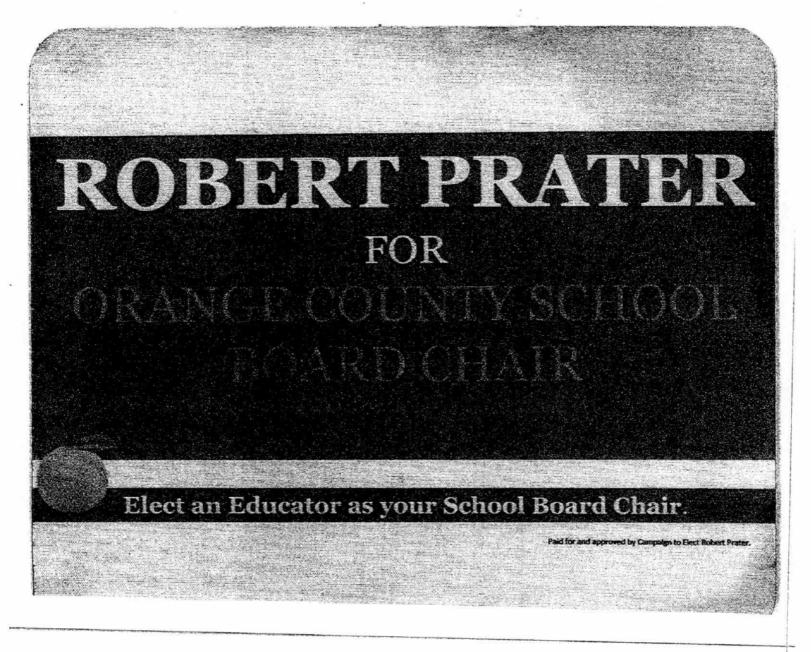
He has spent many years as a community volunteer coaching and umpiring little league teams. He invested his time in cultivating productive student athletes as he assisted coaching the JV Baseball Team from Colonial High School for two seasons. He has devoted himself not only to his schools within Orange County, but also to the employees of Orange County Public Schools working on the Fringe Benefit committee which helped offer the best health care coverage the county could provide.

Essential factors such as retaining our highly qualified teachers, school administrators and support staff would strengthen our foundation. Extending our reach to the community through transparency and involvement efforts would impact every school and community. Having the current educational experience and background to provide real insight into today's educational issues.

www.Voterobprater.com



Paid for and approved by Campaign to Elect Robert Prater







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

December 18, 2018

Robert Prater 9118 Palos Verdes Drive Orlando, FL 32825

RE: Case No.: FEC 18-052: Respondent: Robert Prater

Dear Mr. Prater:

On February 20, 2018, 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 106.143(1)(a), Florida Statutes: Respondent, a 2018 candidate for Chair of the Orange County School Board, paid for and distributed a political advertisement that contained express advocacy but did not include a proper disclaimer.

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 \$250</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 Cole Kekelis at 850-922-4539, extension 106</u>, or at the address listed above, to accept this minor violation consent order offer.

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 http://www.fec.state.fl.us.

Sincerely,

کې -

Tim Vaccaro Executive Director

TV/enr



FW: Erin Riley FEC 18-052 Robert Prater to: FEC@myfloridalegal.com 07/31/2018 08:25 AM Hide Details From: "Robert Prater" <voterobprater@gmail.com> To: "FEC@myfloridalegal.com" <FEC@myfloridalegal.com>

1 Attachment



FEC Response to complaint .docx

Ms Riley,

Just wanted to make sure it got to you as it keeps getting sent back to my mail as undelivered Not sure if it is because of print screens so sending this one without those included.

We did have this complaint open for a while due to not receiving the certified mail sent two previous times. Not only was I starting a new campaign having not done this before but the oversight with the actual receipt of the complaint may have to do with the certified mail we were receiving as notifications for report amendments needed almost monthly.

Amending those said reports if we did have this notice we may have thought it the same notifications coming from our county Supervisor of Elections Office themselves as we always received a letter regularly as well as a certified notice stating the same thing.

Our apologies as it was not our intent to not address.

Campaign to Elect Robert Prater Sent from <u>Mail</u> for Windows 10 Campaign to Elect Robert Prater For Orange County School Board Chair 9118 Palos Verde Drive Orlando, FL. 32825 voterobprater@gmail.com

RE: Case No.: FEC 18-052:; Respondent: Robert Prater

To Ms. Erin Riley

After receiving Complaint case FEC 18-052 we tried very hard to find how this came about and from where. This School Board campaign is my first. It is a true grassroots operation with very little money. Being run by just myself and my wife. Unfortunate in this event it is evident we needed a bit more help.

The website donor page that is in question was created by us with little background in how to actually conceive it. My wife decided to go through other similar campaigns being held to "follow in their footsteps". Though we have spent countless hours trying to figure out where we may have gotten the information we thought was necessary to add to the disclaimer, it is evident now that that disclaimer was a mistake. Since finding no such disclaimer on any other candidate sites we are not sure if it was originally tied into the creation of the website <u>www.voterobprater.com</u> or the conception of the Donorbox account itself.

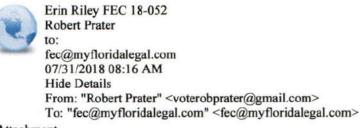
We have since taken down the web address as well as the Donorbox account.

We believe the misunderstanding stems from the "Donorbox" account that was set up. Though going through each line of the account not sure where this non-profit line came into play, as we have paid fees for any donations coming through this site. As of todays date 7/30/2018 and last reports filed on record with the Orange County Supervisors of Elections Office we currently have \$4.00 left in account.

Please let us know if there is anything further needed on our part.

Sincerely,

Robert Prater



1 Attachment



FEC Response to complaint docx

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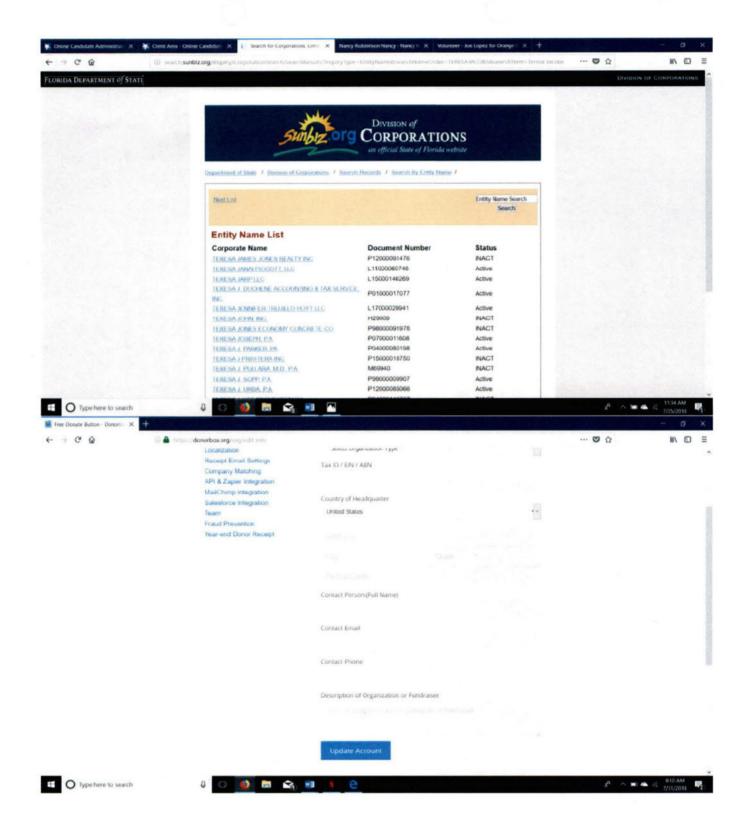
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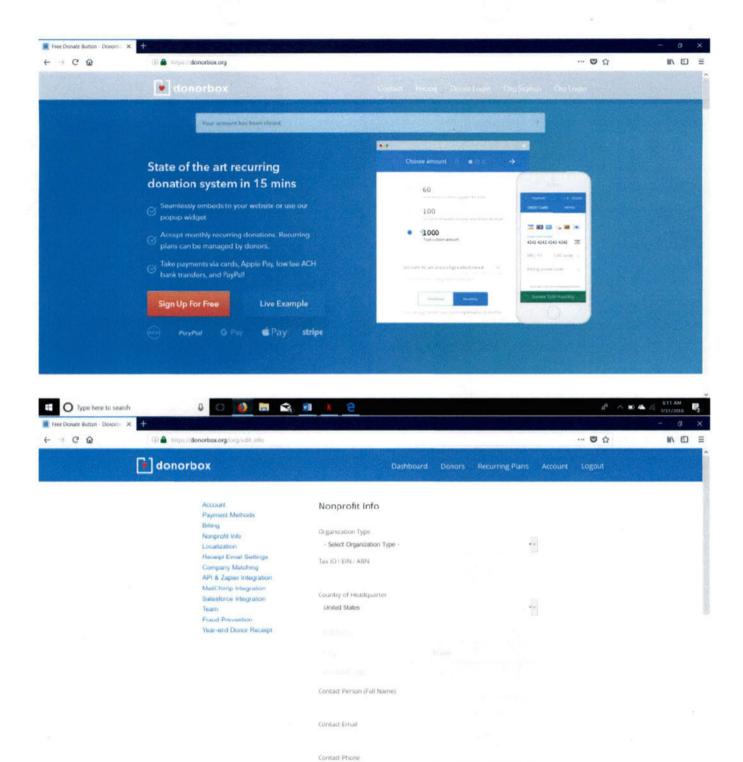
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Campaign to Elect Robert Prater Sent from Mail for Windows 10

Campaign to Elect Robert Prater For Orange County School Board Chair 9118 Palos Verde Drive Orlando, FL. 32825 voterobprater@gmail.com

RE: Case No.: FEC 18-052:; Respondent: Robert Prater

To Ms. Erin Riley

After receiving Complaint case FEC 18-052 we tried very hard to find how this came about and from where. This School Board campaign is my first. It is a true grassroots operation with very little money. Being run by just myself and my wife. Unfortunate in this event it is evident we needed a bit more help.

The website donor page that is in question was created by us with little background in how to actually conceive it. My wife decided to go through other similar campaigns being held to "follow in their footsteps". Though we have spent countless hours trying to figure out where we may have gotten the information we thought was necessary to add to the disclaimer, it is evident now that that disclaimer was a mistake. Since finding no such disclaimer on any other candidate sites we are not sure if it was originally tied into the creation of the website <u>www.voterobprater.com</u> or the conception of the Donorbox account itself.

We have since taken down the web address as well as the Donorbox account.

We believe the misunderstanding stems from the "Donorbox" account that was set up. Though going through each line of the account not sure where this non-profit line came into play, as we have paid fees for any donations coming through this site. As of todays date 7/30/2018 and last reports filed on record with the Orange County Supervisors of Elections Office we currently have \$4.00 left in account.

Please let us know if there is anything further needed on our part.

Sincerely,

Robert Prater

FLORIDA ELECTIONS COMMISSION 107 West Gaines Street, Suite 224, Tallahassee, FL 32399-1050

COMPLAINT

COMPLAINT	20
The Commission's records and proceedings in a case are confidential until the Commission rules on probable cause. A copy of the complaint will be provided to the person against whom it is brought.	FEB'18 PH3:52
1. PERSON BRINGING COMPLAINT:	PH 3
Name: Claramargaret H Groover Work Phone: (407) 808-7656	52
Address: 1124 Bryn Mawr Street Home Phone: ()na	
City: Orlando County: Orange State: FL Zip Code: 32804	
2. PERSON AGAINST WHOM COMPLAINT IS BROUGHT:	
If you intend to name more than one individual or entity, please file multiple complaints . A personance is a presonance of the second	on
Name of individual or entity: Robert Prater	
	2
Address:9118 Palos Verdes DrivePhone: (407) 283-914City:OrlandoCounty:OrangeState:FLZip Code:32825	
If individual is a candidate, list the office or position sought: OCPS Board Chair	
Have you filed this complaint with the State Attorney's Office? (check one) 🗌 Yes 🚺 No	
Are you alleging a violation of Section 104.271(2), F.S.? (check one) Yes No	
Are you alleging a violation of Section 104.2715, F.S.? (check one)	

3. <u>ALLEGED VIOLATION(S)</u>:

Please attach a concise narrative statement in which you list the provisions of the Florida Election Code that you believe the person named above may have violated. The Commission has jurisdiction only to investigate provisions of Chapter 104 and Chapter 106, Florida Statutes. Please include the following items as part of your attached statement:

- The facts and actions that you believe support the violations you allege;
- The names/telephone numbers of persons whom you believe may be witnesses to the facts;
- A copy or picture of any political advertisement(s) you mention in your statement;
- A copy of each document you mention in your statement;
- An explanation of why you believe information you reference from websites is relevant; and
- Any other evidence supporting your allegations.

SEE REVERSE SIDE OF DOCUMENT FOR ADDITIONAL INFORMATION

Any person who files a complaint while knowing that the allegations are false or without merit commits a misdemeanor of the first degree, punishable as provided in Sections 775.082 and 775.083, Florida Statutes.

FEC Form 1 (5/17) Rules 2B-1.0025 & 2B-1.009, F.A.C. FLORIDA ELECTIONS COMMISSION

4. <u>OATH:</u>

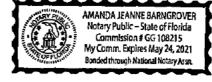
STATE OF FL	ORIDA
COUNTY OF	ORANGE

I swear or affirm that the above information is true and correct to the best of my knowledge.

Driginal Signature of Person Bringing Complaint

Sworn to and subscribed before me this 16 day of buary _, 20 <u>| 8</u>_ Officer Authorized to Administer Oaths or Notary Public Signature of

ignature of Officer Authorized to Authinister Daths of Notary Public



Amanda Barngrover

(Print, Type, or Stamp Commissioned Name of Notary Public) Personally Known_____Or Produced Identification_____ Type of Identification Produced_<u>FL_Drivers_licens</u>

5. IMPROPERLY COMPLETED COMPLAINT FORMS MAY BE RETURNED:

- You MUST submit this completed complaint form in order to file a complaint.
- You MUST complete ALL FOUR of the above sections of this form. DO NOT leave any blanks.
- You MUST submit the ORIGINAL complaint form. Copied/faxed/emailed forms are returned.
- Each complaint can only be filed against ONE PERSON or ENTITY. If you wish to file against multiple parties, you MUST submit a complaint form for each party you wish to file against.
- **DO NOT** submit multiple complaint forms with one set of attachments applying to multiple complaints. You **MUST** attach **copies** of attachments **to each complaint** to which they apply.
- MAKE SURE the alleged violation(s) of Chapters 104 or 106 occurred within the last 2 years.
- MAKE SURE your complaint is sworn and there is no defect to the notarization in Section 4.

10: FL ELECTIONS COM 20 FEB'18 PM3:52

NARRATIVE STATEMENT OF ALLEGED VIOLATIONS OF THE FLORIDA ELECTION CODE BY CANDIDATE ROBERT A. PRATER, CANDIDATE FOR ORANGE COUNTY SCHOOL BOARD CHAIR

Please consider this statement as part of the Complaint in response to Paragraph 3 setting forth the Alleged Violations:

<u>Section 106.143(1)(c), Florida Statutes, requires that a candidate must "state the name and address of the persons paying for the advertisement."</u>

Mr. Prater solicits campaign contributions through a website at <u>http://voterobprater.com/</u>, page 3, which gives the following notice:

We are a 501(c)(3) non-profit organization. The campaign to Elect Robert A Prater, (sic) EIN is 82-3886419. All contributions are non-tax deductible. No goods or services will be provided in exchange for this contribution.

A copy of the screen shot is included with the Complaint and this Narrative as Exhibit "1." First, I have been unable to locate any entity authorized to do business either as a properly formed Florida corporation, a limited liability company, or an entity doing business as "The Campaign to Elect Robert A Prater" with a properly filed Fictitious Name Affidavit with the Florida Department of State, Division of Corporations. Second, I have not been able to identify any Florida entity associated with the Federal Tax Identification Number listed.

Is Mr. Prater paying for the advertisement personally? Is a properly organized and documented campaign organization paying? If so, what is the legal name of the entity? Is the so-called 501(c)(3) paying for the advertisement? If the answer to the last question is "yes" such involvement in a political campaign would expressly violate a condition of the IRS ruling creating such a tax exempt entity.

- Why does the advertisement say that "we" are a 501(c)(3) non-profit organization, a tax exempt designation, and then declare that contributions are non-tax deductible?
- Who is actually paying for the advertisement? The footer on each webpage states, "Political advertisement paid for and approved by the candidate."
- Exhibits "2", "3", and "4" are a composite print-out of Mr. Prater's website, page 3, donor page.
- Exhibit "5" is the Google index listing the donor page and showing this misrepresentation.

You may contact me at chgroover@grooverlawfirm.com and by phone at (407) 808-7656.

Respectfully submitted,

Claramargaret H. Goover



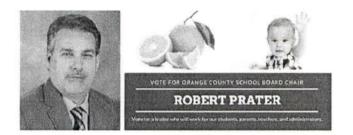
Campaign to Elect Robert Prater

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A donation to our campaign means we are one step closer to putting a teacher in the School Board Chair. Your contribution will go a long way in continuing to spread the word across our School District. Helping our campaign will help elect a leader who will work for our students, parents, teachers, and administrators.

We are a 501(c)(3) non-profit organization. The campaign to Elect Robert A Prater, EIN is 82-3886419. All contributions are non-tax deductible. No goods or services will be provided in exchange for this contribution.

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Campaign to Elect Robert Prater

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5 Reasons Orange County Needs Robert Prater in the School Board Chair.

Page 3 of wobsite

Orange County is falling behind in education

- Despite staying in the top ten for the past few years,
 Florida's "Quality Counts" place has recently
 plummeted # 28 in the national ranking.
- Orange county public schools ranks #27 in Florida with an overall grade of B, making our lack of focused education a culprit in Florida's lower ranking.

• We have a severe shortage of highly qualified teachers

- OCPS teachers working conditions are ranked at the bottom with a C-. There is *no* lower grade. How can we secure qualified teachers if we're not providing them with a viable work environment?
- The average teacher salary \$41,125 (\$30,126-\$51,302). 39 Florida counties have higher salaries. Why aren't we compensating our educators for their hard work?

Orange County ESE Programs

- After missing goals for four years in a row, Orange County has been placed near the bottom of Florida's list.
- Special education needs are not being met and parent complaints are not being expedited and resolved.
- Our schools continuous Safety
 Improvements
 - According to information from 2012-2013 (obtained from the Department of Education) Orange County is
 home to 11 of the 25 most department exhaple, despite

- vears.
- Our School System ranks at #32 in school district safety reports.

Page 3 of website

The importance of an EDUCATOR as the CHAIRMAN of our Education BOARD

- The schoolboard should be focused on schools, so why is it that it's filled with politicians and lawyers instead of people who *know* what it takes to run a school?
- Poor education affects everyone in the county: property values go down, crime goes up, we have less qualified workers in the workforce, and taxes are raised as a result.

Your contribution can turn the tides for the Prater campaign and change the future of Orange County education. Build a brighter future for our children by putting an educator in the School Board Chair.

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5 Reasons Orange County Needs. Robert Prater in the School Board Chair. Orange County is falling behind in education. Despite staying in the top ten for the past few years, Florida's "Quality Counts" place has recently plummeted # 28 in the national ranking. Orange county public schools ranks #27 in Florida with an .

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Robert Prater Enters Race For Orange County School Board Chair ... orlando-politics.com/.../robert-prater-enters-race-orange-county-school-board-chair/ -Jan 8, 2018 - Robert Prater, current dean and part of the leadership team at Oak Hill Elementary, committed to the students and the community, announced his run for Orange County School Board Chair. If elected, he will be the first teacher to sit as board chair since its inception in 2012. Mr. Prater's career began as a ...

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Teacher Robert Prater files to run for Orange County School Board ... orlando-rising.com/teacher-robert-prater-files-run-orange-county-school-board-chair/ * Jan 2, 2018 - Orange County teacher Robert Allen Prater has filed to run for the chair's position of the Orange County School Board. Prater, 54, of Orlando, is seeking to succeed School Board Chair Bill Sublette, who is running for Orange County mayor. In filing Dec. 27, Prater opens a contest for the chair's job with ...

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Robert Prater, current dean and part of the leadership team at Oak Hill Elementary, has been a committed educator and advocate for almost fifteen years. Robs OCPS career began as a substitute back in 2005. He continued working for OCPS as a paraprofessional while he completed his degree in Education attending ...

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Donate to the Campaign | Campaign to Elect Robert Prater

www.voteroborater.com/donate.html > ... as the School Board Chair. We need to continue to spread the word across our School District. So please contribute to our campaign. All donations from \$25,00 up to \$1000 (max), is much appreciated. Please visit our PayPal account; Campaign to Elect Robert Prater at https://www.paypal.com/paypalme/Voterobertprater.

About | Campaign to Elect Robert Prater

www.voterobprater.com/about.html -

About the Candidate, Robert Prater has been living in Orange County for over thirty years now. He and his wife have been together for the past 25 years now and have raised their family in the same publicschool district from Kindergarten to Senior year. He was an entrepreneur who owned his own transportation company ...

Contact | Campaign to Elect Robert Prater

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Campaign to Elect Robert Prater 9118 Palos Verde Drive Orlando, FL 32825 407-283-9142 www.voterobprater.com. EMAIL: voterobprater@gmail.com. Thank you for your visit to this site and for your interest in our campaign! Should you have any questions or comments, please feel free to get in contact with us anytime.

Events and Fundraisers | Campaign to Elect Robert Prater voterobprater.com/events.html •

ELECT Robert Prater for Orange County School Board Chair. Time to put a highly qualified educator in the Chairman Seat. Menu. Home · About · Donate · Volunteer · Contact · Events J. Endorse ...

Campaign Kickoff to Elect Robert Prater, Orlando

usa-eventer.com > Cities > Orlando >

Friday 4:30pm (26 January) Miller's Ale House Orlando The Campaign Kickoff will take place Friday, January 26th, 2018. This event will allow us to get the message out about our campaign. It will bring together "old" friends from all over Or.

County Candidates - Orange County Supervisor of Elections www.ocfelections.com/countycandidates_2018.aspx -