

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Kristopher Guzman

Case No.: FEC 19-431

TO: Kristopher Guzman
1825 Ponce de Leon Blvd., # 373
Coral Gables, FL 33134

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

NOTICE OF VIRTUAL HEARING (INFORMAL HEARING)

A hearing will be held in this case before the Florida Elections Commission **on February 23, 2021 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 Webinar ID 627-359-707, or via teleconference by dialing (877) 309-2071 and entering the meeting access code 324-720-215, 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
February 2, 2021

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 32399-6596

Telephone: (850) 922-4539 · Facsimile: (850) 921-0783

FEC@myfloridalegal.com · www.fec.state.fl.us



Commission Meeting February 23, 2021 at 8:30AM via GoToWebinar and OpenVoice

In order to participate in the public portion of the February 23, 2021, 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: 627-359-707
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 1-877-309-2071
 2. Enter Audio Access Code 324-720-215
 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) of interest, when contacting our office.

Thank you,

Commission Staff

STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION

Florida Elections Commission,
Petitioner,

Case No.: FEC 19-431

v.

Kristopher Guzman,
Respondent.

_____ /

ORDER OF PROBABLE CAUSE

THIS MATTER was heard by the Florida Elections Commission (Commission) at its regularly scheduled meeting on December 1, 2020, in Tallahassee, Florida.

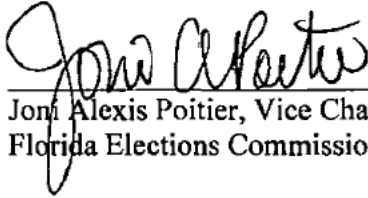
On April 2, 2020, Staff recommended to the Commission that there was probable cause to believe that the Florida Election Code was violated. The facts articulated in Staff's Recommendation are adopted by reference and incorporated herein. Based on the Complaint, Report of Investigation, Staff's Recommendation, 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

Count 1:

On or about June 27, 2019, Kristopher Guzman violated Section 106.07(2)(b)1., Florida Statutes, when he failed to timely file an addendum to Floridians for Truth PC's 2019 M4 Report within seven days after receiving notice from the Department of State, Division of Elections, that the report required amendment.

DONE AND ORDERED by the Florida Elections Commission on December 1, 2020.



Jon Alexis Poitier, Vice Chair
Florida Elections Commission

Copies furnished to:
Stephanie J. Cunningham, Assistant General Counsel
Kristopher Guzman, Respondent
Division of Elections, Complainant

NOTICE OF RIGHT TO A HEARING

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

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

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

any witness, and to rebut the evidence presented against you.

If you do not elect to resolve the case by consent order or request a formal hearing at the DOAH or an informal hearing before the Commission within 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: Kristopher Guzman

Case No.: FEC 19-431

TO: Kristopher Guzman
1825 Ponce de Leon Blvd., # 373
Coral Gables, FL 33134

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

NOTICE OF HEARING (PROBABLE CAUSE DETERMINATION)

A hearing will be held in this case before the Florida Elections Commission on, **December 1, 2020 at 10:00 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.

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

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

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

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

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

See further instructions on the reverse side.

Tim Vaccaro

Executive Director
Florida Elections Commission
November 9, 2020

Please refer to the information below for further instructions related to your particular hearing:

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

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

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

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

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

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

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Kristopher Guzman

Case No.: FEC 19-431

STAFF RECOMMENDATION FOLLOWING INVESTIGATION

Pursuant to Section 106.25(4)(c), Florida Statutes, undersigned staff counsel files this written recommendation for disposition of the referral in this case recommending that there is **probable cause** to charge Respondent with violating **Section 106.07(2)(b)1., Florida Statutes**. Based upon a thorough review of the Report of Investigation submitted on January 13, 2020, the following facts and law support this staff recommendation:

1. On July 8, 2019, the Florida Elections Commission (“Commission”) received a referral from the Department of State, Division of Elections (“Division”), alleging that Kristopher Guzman (“Respondent”) violated Chapter 106, Florida Statutes. (ROI Exhibit 1)¹

2. Respondent is the Chairman (ROI Exhibit 3), Treasurer (ROI Exhibit 2), and Registered Agent (ROI Exhibit 1) for Floridians for Truth PC, a political committee registered with the Division (ROI Exhibit 3) and has been its Chairman and Treasurer since its inception in October of 2018.

3. On August 7, 2019, the Executive Director notified Respondent by mail that Commission staff would investigate the following statutory provisions:

Section 106.07(7)(b)1., Florida Statutes: Respondent, Chairman, Treasurer, and Registered Agent for Floridians for Truth PC, a political committee registered with the Division of Elections, failed to timely make necessary amendments to the following campaign treasurer report, as alleged in the complaint: 2019 M4.

4. On October 22, 2018, the Division sent Respondent a letter (ROI Exhibit 4, page 1) acknowledging that the Division had received Respondent’s Statement of Organization (ROI Exhibit 3) and Appointment of Campaign Treasurer and Designation of Campaign Depository (ROI Exhibit 2) for Floridians for Truth PC.

5. The acknowledgment letter advised Respondent that all the Division’s publications and reporting forms were available on its website and directed Respondent to print out the *Political Committee Handbook*, *Calendar of Reporting Dates* as well as other relevant documents. (ROI Exhibit 4, page 2)

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

6. Section 106.07(2)(b)1., Florida Statutes, states: “Any **report** that is deemed to be **incomplete** by the officer with whom the candidate qualifies must be **accepted** on a **conditional basis**. The campaign **treasurer** shall be **notified** by certified mail or by another method using a common carrier that provides a proof of delivery of the notice as to **why** the report is **incomplete and within 7 days** after receipt of such notice **must file an addendum** to the report **providing all information necessary to complete the report** in compliance with this section. Failure to file a complete report after such notice constitutes a violation of this chapter.” (Emphasis added)

7. On May 10, 2019, Respondent filed an original 2019 M4 report (ROI Exhibit 5) with the Division that listed \$4,000.00 in contributions (ROI Exhibit 5, page 2) and \$6,000.00 in expenditures (ROI Exhibit 5, page 3) for the reporting period.

8. On May 23, 2019, the Division mailed Respondent a letter informing him that the 2019 M4 report was incomplete and attached a list of errors specifically stating the errors that required amending. (ROI Exhibit 6)

9. On June 6, 2019, the Division mailed Respondent a second letter informing him that the 2019 M4 report was still incomplete and again attached a list of errors specifically stating the errors that required amending. (ROI Exhibit 7)

10. On June 18, 2019, the Division mailed Respondent a Final Notice again informing him that the 2019 M4 Report remained incomplete and again attached a list of errors specifically stating the errors that required amending. (ROI Exhibit 8) The letter was delivered to Respondent on or about June 20, 2019. (ROI Exhibit 8, page 3)

11. A subpoena was issued to Respondent’s designated campaign depository to ascertain whether any financial activity occurred during the relevant reporting period. In response to the subpoena, the Operations Manager for subpoena processing stated she was unable to locate records related to the named subjects in the subpoena involving Respondent’s account. (ROI Exhibit 9)

12. On December 2, 2019, the Division informed investigations that Respondent had not properly amended his 2019 M4 report and that the report remained incorrect and incomplete. (ROI Exhibit 10)

13. Respondent did not respond in writing or otherwise to the Complaint, the Legal Sufficiency letter, the Report of Investigation and any accompanying letters Commission staff mailed to him with those documents. In addition, Respondent did not return any phone calls when investigations left voicemail messages for Respondent on August 5, 2019, November 25, 2019, and January 9, 2020. (ROI Exhibit 12)

14. On October 22, 2018, as stated previously, when the Division acknowledged receipt of Respondent’s Statement of Organization and Appointment of Campaign Treasurer and Designation of Campaign Depository, Respondent was advised where all the Division’s publications and reporting forms were available.

15. Respondent was also directed to print out Chapter 106, Florida Statutes, the

Political Committee Handbook, Calendar of Reporting Dates as well as other relevant documents.

16. The Division further informed Respondent: "It is your responsibility to read, understand, and follow the requirements of Florida's election laws."

17. "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).

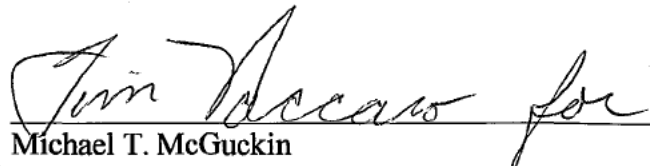
18. The facts set forth above show that Respondent as the Chairman and Treasurer for Floridians for Truth, a political committee registered with the Division, failed to timely file an addendum to the committee's 2019 M4 Report within seven days after receiving notice from the Division that the report required amending.

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

Count 1:

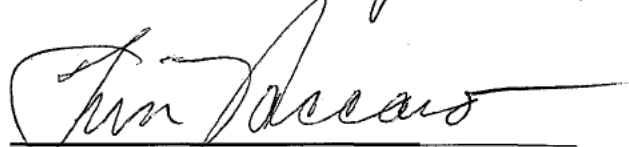
On or about June 27, 2019, Kristopher Guzman violated Section 106.07(2)(b)1., Florida Statutes, when he failed to timely file an addendum to Floridians for Truth PC's 2019 M4 Report within seven days after receiving notice from the Department of State, Division of Elections, that the report required amendment.

Respectfully submitted on April 2, 2020.



Michael T. McGuckin
Assistant General Counsel

I reviewed this Staff Recommendation this 2nd day of April 2020.



Tim Vaccaro
Executive Director

FLORIDA ELECTIONS COMMISSION
REPORT OF INVESTIGATION
Case No.: FEC 19-431

Respondent: Kristopher Guzman

Counsel for Respondent: n/a

Complainant: Division of Elections

Counsel for Complainant: n/a

On July 8, 2019, the Florida Elections Commission (Commission) received a referral alleging that Respondent violated Chapter 106, Florida Statutes. Commission staff investigated whether Respondent violated the following statute:

Section 106.07(2)(b)1, Florida Statutes, failure of a campaign treasurer of a political committee to file an addendum to an incomplete report after receiving notice from the filing officer.

I. Preliminary Information:

1. Respondent is the chairman, treasurer, and registered agent of the Floridians for Truth Political Committee. The committee has a special interest to "POLITICAL educate and advocate based on candidate positions and/or issues".

2. Complainant is the Division of Elections (DOE).

II. Alleged Violation of Section 106.07(2)(b)1, Florida Statutes:

3. I investigated whether Respondent violated this section of the election laws by not filing an addendum to the 2019 M4 Report, after receiving notices that it was incomplete.

4. Complainant alleges that Respondent did not amend a campaign report after being notified that it was incomplete by the filing officer. Complainant states that Respondent has failed to amend the 2019 M4 Report.

5. A DOE staff representative, Kristi Willis, submitted a referral dated July 5, 2019 regarding Respondent's failure-to-file an addendum to the 2019 M4 Report. To view a copy of the July 5, 2019 referral from DOE, refer to exhibit 1.

6. On October 18, 2018, Respondent's chairman filed the current Appointment of Campaign Treasurer and Designation of Campaign Depository for Political Committees (DS-DE 6) with his Filing Officer. Respondent appointed himself as his own campaign treasurer. To view a copy of the DS-DE 6 form, refer to exhibit 2.

7. On October 18, 2018, Respondent also filed a Statement of Organization for the political committee: Floridians For Truth PC. The scope of this committee is reported as,

“Statewide committee to support or oppose candidates for Statewide, Legislative, Multi-county, County, or Municipal office, and other activities allowed under Florida Statutes and Election Law”. To view a copy of the Statement of Organization, refer to exhibit 3.

8. On October 22, 2018, Complainant mailed Respondent a letter acknowledging receipt of the DS-DE 6 form and informing him that the name of his organization has been placed on the active committee list as a political committee. To view a copy of the acknowledgement letter, refer to exhibit 4.

9. On May 10, 2019, Respondent filed an original 2019 M4 Report with his Filing Officer. This report included \$4,000.00 in received contributions, and \$6,000.00 in expenditures during this reporting period. To view a copy of the original 2019 M4 Report, refer to exhibit 5.

10. On May 23, 2019, Complainant mailed Respondent a letter informing him that the 2019 M4 Report was incomplete. Complainant attached a list of errors to this letter that specifically stated the errors that required amending. This letter was sent to the address Respondent provided on his DS-DE 6 form (Exhibit 2). To view a copy of the May 23, 2019 failure-to-amend letter, refer to exhibit 6.

11. On June 6, 2019, Complainant mailed Respondent another letter informing him that the 2019 M4 Report was still incomplete. Complainant also attached a list of errors to this letter that specifically stated the errors that required amending. This letter was also sent to the address Respondent provided on his DS-DE 6 form (Exhibit 2). To view a copy of the June 6, 2019 failure-to-amend letter, refer to exhibit 7.

12. On June 18, 2019, Complainant mailed Respondent a “Final Notice” via certified mail informing him that the 2019 M4 Report remained incomplete. Complainant attached a list of errors to this letter that specifically stated the errors that required amending. This letter was also sent to the address Respondent provided on his DS-DE 6 form (Exhibit 2). To view a copy of the June 18, 2019 failure-to-amend letter with delivery confirmation receipt, refer to exhibit 8.

13. FEC staff subpoenaed Respondent’s campaign depository in an attempt to obtain Respondent’s political committee’s financial information. The reported depository was unable to locate any records in response to the subpoena. To view a copy of the declaration letter from Respondent’s alleged campaign depository, refer to exhibit 9.

14. In a email from Kristi Willis, FEC staff was advised that Respondent has not amended the 2019 M4 Report at this time. DOE records reflect that there has been no activity on the 2019 M4 Report since May 22, 2019. To view a copy of the email from DOE, refer to exhibit 10. To view a copy of Respondent’s filing history, refer to exhibit 11.

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

III. FEC History:

16. None.

Conclusion:

17. Respondent was offered several opportunities to make comments regarding the findings of this investigation. Respondent did not respond to any of these attempts. To view a copy of the phone log, refer to exhibit 12.

18. In the October 22, 2018 acknowledgement letter, Respondent was informed that all of the Division's publications were available online at DOE's website. In the letter, Respondent was admonished as follows: **It is your responsibility to read, understand, and follow the requirements of Florida's election laws. Therefore, please print a copy of the following documents: Chapter 106, Florida Statutes, Political Committee Handbook, Calendar of Reporting Dates, and Rule 1S-2.017, Florida Administrative Code.** To view a copy if the October 22, 2018 acknowledgement letter, refer to exhibit 4.

Respectfully submitted on January 13, 2020.



Cedric Oliver
Investigation Specialist

Current address of Respondent	Current address of Complainant
Kristopher Guzman 1825 Ponce de Leon Blvd., #373 Coral Gables, Fl 33134	Division of Elections 500 South Bronough Street, Room 316 Tallahassee, Fl 32399
Name and Address of Filing Officer:	Chair of Committee
Ms. Kristi Willis Chief of Bureau of Election Records 500 South Bronough Street, Room 316 Tallahassee, Fl 32399	Kristopher Guzman, Chair Floridians for Truth PC 1825 Ponce de Leon Blvd., #373 Coral Gables, Fl 33134

Copy furnished to: Mr. Cole Kekelis, Chief Regulatory Counsel

FLORIDA ELECTIONS COMMISSION
REPORT OF INVESTIGATION
Kritopher Guzman -- FEC 19-431

LIST OF EXHIBITS	
Exhibits #s	Description of Exhibits
Exhibit 1	July 5, 2019 referral from DOE
Exhibit 2	Respondent's DS-DE 6 form
Exhibit 3	Statement of Organization
Exhibit 4	Acknowledgement Letter
Exhibit 5	Original 2019 M4 Report
Exhibit 6	May 23, 2019 failure-to-amend letter
Exhibit 7	June 6, 2019 failure-to-amend letter
Exhibit 8	June 18, 2019 failure-to-amend letter with delivery confirmation receipt
Exhibit 9	Declaration letter from JP Morgan Chase Bank
Exhibit 10	Email from DOE
Exhibit 11	Respondent's filing history
Exhibit 12	Phone Log

**DIVISION OF ELECTIONS
FEC NOTICE FORM**

To FEC from Division of Elections

Name: Floridians For Truth PC
Account Number: 73878
Chairperson: Kristopher Guzman
Treasurer: Kristopher Guzman
Registered Agent: Kristopher Guzman

The Division of Elections hereby provides this notice to the Florida Elections Commission pursuant to sections 106.22(7) and 106.25, Florida Statutes. An apparent violation of Chapter 106, F.S., has occurred based upon a failure to file addendums after notice as required by section 106.07(2), Florida Statutes, for the following report:

2019 M4

- Floridians For Truth PC (73878) a political committee registered with the Division has failed to make the necessary amendments to the 2019 M4 report or provide a written explanation regarding the same.
- On October 18, 2018, the organization was registered and placed in an active status with the Division, and has remained active since that date. Kristopher Guzman is the chairperson, treasurer, and registered agent.
- On May 23, 2019, the Division mailed Mr. Guzman notification that one or more campaign treasurer's reports were incomplete.
- On June 6, 2019, the Division mailed Mr. Guzman notification that one or more campaign treasurer's reports were incomplete.
- On June 18, 2019, the Division mailed Mr. Guzman final notification with delivery confirmation that one or more campaign treasurer's reports were incomplete. (See attached letter and delivery confirmation.)

EXHIBIT

1 (1 of 2)

FLORIDA DIVISION OF ELECTIONS
6700 BOULEVARD
TALLAHASSEE, FL 32310

- As of July 5, 2019, one or more campaign treasurer's reports remain incomplete.

Sent By: Kristi Reid Willis
Date: July 5, 2019 *KRW*

ejr


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

RECEIVED
DEPARTMENT OF STATE
2018 OCT 18 AM 11:24
DIVISION OF ELECTIONS
TALLAHASSEE, FL

CHECK APPROPRIATE BOX:

OFFICE USE ONLY

Initial Filing of Form Re-filing to Change: Treasurer/Deputy Primary/Secondary Depository

1. Committee or Organization Floridians For Truth PC		2. Telephone (305) 699-5054	
3. Name of Treasurer or Deputy Treasurer Kristopher Guzman		4. Email (optional) ()	
5. Telephone (optional) ()			
6. Mailing Address 1825 Ponce de Leon Blvd. #373, Coral Gables, FL 33134			
7. Street Address 1825 Ponce de Leon Blvd. #373, Coral Gables, FL 33134			
8. The following bank has been designated as the <input checked="" type="checkbox"/> Primary Depository <input type="checkbox"/> Secondary Depository			
9. Name of Bank Chase Bank		10. Street Address 1300 Ponce De Leon	
11. City Coral Gables		12. State FL	13. Zip Code 33134
14. Signature of Chairman X 		15. Name of Chairman (Print or Type) Kristopher Guzman	

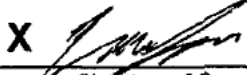
Campaign Treasurer's Acceptance of Appointment

I, **Kristopher Guzman**, do hereby accept the appointment as
(Please Print or Type)
 treasurer or deputy treasurer for **Floridians For Truth PC**
(Committee or Organization)

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

October 10, 2018

Date

X 
Signature of Campaign Treasurer or Deputy Treasurer

**STATEMENT OF ORGANIZATION
OF POLITICAL COMMITTEE**

(PLEASE TYPE)

OFFICE USE ONLY
RECEIVED
DEPARTMENT OF STATE
2018 OCT 18 AM 11:24
DIVISION OF ELECTIONS
TALLAHASSEE, FL

73878

1. Full Name of Committee Floridians For Truth PC	Telephone (305) 699 - 5054
---	--------------------------------------

Mailing Address (include city, state and zip code)
1825 Ponce de Leon Blvd., #373, Coral Gables, FL 33134

Street Address (include city, state and zip code)
1825 Ponce de Leon Blvd., #373, Coral Gables, FL 33134

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

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

3. Area, Scope and Jurisdiction of the Committee
Statewide committee to support or oppose candidates for Statewide, Legislative, Multi-county, County, or Municipal office, and other activities allowed under Florida Statutes and Election Law.

4. Nature of Organization or Organization's Special Interest (e.g., medical, legal, education, etc.)
POLITICAL-educate and advocate based on candidate positions and/or issues.

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

Full Name	Mailing Address	Committee Title or Position
Kristopher Guzman	1825 Ponce de Leon Blvd., #373 Coral Gables, FL 33134	TREASURER AND CUSTODIAN OF BOOKS

EXHIBIT 3 (of 2)

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

Full Name	Mailing Address	Committee Title or Position
Kristopher Guzman	1825 Ponce de Leon Blvd., #373 Coral Gables, FL 33134	Chairperson

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

Full Name	Mailing Address	Office Sought	Party
To Be Determined			

8. List Any Issues this Committee is Supporting: To Be Determined

List Any Issues this Committee is Opposing: To Be Determined

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

N/A

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

CONTRIBUTE TO CANDIDATES, POLITICAL COMMITTEES, POLITICAL PARTIES, AND OTHER ACTIVITIES NOT PROHIBITED BY LAW.

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

Name of Bank or Depository & Account Number	Mailing Address
Chase Bank	1300 Ponce De Leon Coral Gables, FL 33134

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

Report Title	Dates Required to be Filed	Name & Position of Official	Mailing Address
FORM SS-4	UPON FORMATION	IRS	OGDEN, UT 84201
FORM 8871	UPON FORMATION	IRS	OGDEN, UT 84201
FORM 1120POL	MARCH 15, ANNUALLY	IRS	OGDEN, UT 84201
FORM 990	MAY 15, ANNUALLY	IRS	OGDEN, UT 84201

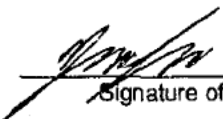
STATE OF Florida

Miami Dade COUNTY

I, Kristopher Guzman, certify that the information in this Statement of

Organization is complete, true and correct.

X


Signature of Chairman of Political Committee

October 10, 2018

Date

EXHIBIT 3 (2 of 2)



FLORIDA DEPARTMENT *of* STATE

RICK SCOTT
Governor

KEN DETZNER
Secretary of State

October 22, 2018

Kristopher Guzman, Chairperson
Floridians For Truth PC
1825 Ponce de Leon Boulevard #373
Coral Gables, Florida 33134

Dear Mr. Guzman:

This will acknowledge receipt of the Statement of Organization and Appointment of Campaign Treasurer and Designation of Campaign Depository for **Floridians For Truth PC**, which were placed on file in our office on October 18, 2018. This information appears to comply with the requirements of Section 106.03, Florida Statutes, and the name of this organization has been placed on our active committee list as a political committee.

Campaign Treasurer's Reports

Your first campaign treasurer's report will be due on **October 26, 2018**. The report will cover the period of October 13-19, 2018 (2018 G6). All political committees that file reports with the Division of Elections are required to file by means of the Division's Electronic Filing System (EFS).

EFS Access

Below is the web address to access the EFS and the committee's user identification number. The enclosed sealed envelope contains the committee's filing credentials.

EFS Website Address: <https://efs.dos.state.fl.us>

Identification Number: 73878

Timely Filing

All reports must be completed and filed through the EFS not later than midnight, Eastern Standard Time, of the due date. Reports not filed by midnight, Eastern Standard Time, of the due date are late filed and subject to the penalties in Section 106.07(8), Florida Statutes. In the event that the

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



EXHIBIT 4 (1 of 2)

Kristopher Guzman, Chairperson
October 22, 2018
Page Two

EFS is inoperable on the due date, the report will be accepted as timely filed if filed no later than midnight, Eastern Standard Time, of the first business day the EFS becomes operable. No fine will be levied during the period the EFS was inoperable.

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

Electronic Receipts

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

Instructions and Assistance

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

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

Please let me know if you need additional information.

Sincerely,



Kristi Reid Willis, Chief
Bureau of Election Records

KRW/zjs

Enclosures

EXHIBIT

4 (2 of 2)

**FLORIDA DEPARTMENT OF STATE, DIVISION OF ELECTIONS
CAMPAIGN TREASURER'S REPORT SUMMARY**

(1) Floridians For Truth PC (2) 73878
 Candidate, Committee or Party Name I.D. Number

(3) 1825 Ponce de Leon Blvd #373 Coral Gables FL 33134
 Address (number and street) City State Zip Code

Check box if address has changed since last report

(4) Check appropriate box(es):

Candidate (office sought):
 Political Committee Check If PC has DISBANDED
 Committee of Continuous Existence Check If CCE has DISBANDED
 Party Executive Committee

(5) REPORT IDENTIFIERS

Cover Period: From 04/01/2019 To 04/30/2019 Report Type: M4

Original Amendment Special Election Report

(6) CONTRIBUTIONS THIS REPORT

Cash & Checks \$4,000.00
 Loans \$0.00
Total Monetary \$4,000.00
 In-Kind \$0.00

(7) EXPENDITURES THIS REPORT

Monetary Expenditures \$6,000.00
 Transfers to Office Account \$0.00
Total Monetary \$6,000.00

(8) Other Distributions

Certification

It is a first degree misdemeanor for any person to falsify a public record (ss.839.13, F.S.)

I certify that I have examined this report and it is true, correct and complete

Name of Treasurer Deputy Treasurer

X
Signature

I certify that I have examined this report and it is true, correct and complete

Name of Candidate Chairman (PC/PTY Only)

X
Signature

Name: Floridians For Truth PC

Report: 2019 M4

Period: 04/01/2019 to 04/30/2019

** Records in Filed Report **

Seq # Date	Full Name (Last, Suffix, First, Middle Street Address & City, State, Zip	Contributor Type	Occupation In-Kind Description	Amount Amend
* 1	BUILDING A BRIGHTER FUTURE FOR FLORIDA 2055 NW DIAMOND CREEK WAY JENSEN BEACH, FL 34957	X		\$4,000.00
		X		

Name: Floridians For Truth PC

Report: 2019 M4

Period: 04/01/2019

to 04/30/2019

** Records in Filed Report **

Seq # Date	Full Name (Last, Suffix, First, Middle Street Address & City, State, Zip	Type	Purpose	Amount Amend
* 1 04/19/2019	MINUTEMAN PRESS 1704 PONCE DE LEON BLVD CORAL GABLES, FL 33134	X	MAILER	\$2,000.00
* 2 04/29/2019	MINUTEMAN PRESS 1704 PONCE DE LEON BLVD CORAL GABLES, FL 33134	X	MAILER	\$2,000.00
* 3 04/30/2019	MINUTEMAN PRESS 1704 PONCE DE LEON BLVD CORAL GABLES, FL 33134	X	MAILER	\$2,000.00

ID:

CAMPAIGN

ASURER'S REPORT - ITEMIZED FINANCIAL TRANSFERS

TRANSFERS

Name: Floridians For Truth PC

Report: 2019 M4

Period: 04/01/2019

to 04/30/2019

** Records in Filed Report **

Seq # Date	Full Name (Last, Suffix, First, Middle Street Address & City, State, Zip	Type	Nature of Account	Amount Amend

EXHIBIT

5(4 of 5)

ID:

CAMP

MEASURER'S REPORT - ITEMIZED

CONTRIBUTIONS

Name: Floridians For Truth PC

Report: 2019 M4

Period: 04/01/2019

to 04/30/2019

** Records in Filed Report **

Seq # Date	Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip	Recipient	Purpose	Amount Amend
		Type	Related Expenditure	

* Incomplete Record

Reviewed On: 5/22/19 2:39 pm

Prepared on: 7/5/19 7:57:46AM

EXHIBIT 5 (5 of 5)



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

May 23, 2019

Kristopher Guzman, Chairperson for
Floridians For Truth PC
1825 Ponce de Leon Blvd #373
Coral Gables, FL 33134

Re: PAC 73878

Dear Mr. Guzman:

The Division of Elections has determined that one or more campaign reports are incomplete for the reasons noted in the attached error report.

Pursuant to Section 106.07(2), Florida Statutes, you have 7 days from receipt of this notice to file an amended report to correct errors or provide missing information. If the information has been reported accurately, provide a written explanation to the Division addressing the issue noted in the error report. Please be advised that failure to supply this information within the time allowed may constitute a violation of Chapter 106, Florida Statutes.

If you need assistance in filing an amendment, please contact the Division's help line at (850) 245-6280.

Sincerely,

Kristi Reid Willis, Chief
Bureau of Election Records

Attachment

EXHIBIT

6(1 of 2)

Error Report

Committee: Floridians For Truth PC

Type: PAC - BOT

Report: 2019 M4 (6) Covering Period: 4/1/19 - 4/30/19

Account: 73878

Contributions

-----Contributor----- Contribution-----

Seq	Date	Name	Address	City/State/Zip	Type	Occupation	Type	Amount	InKind	Descrip	Amend
1		BUILDING A BRIGHTER FUTURE FOR FLORIDA	2056 NW DIAMOND CREEK WAY	JENSEN BEACH, FL 3-4957	X		X	\$4,000.00			

- *The Transaction Date Is Either Before Or After The Report Coverage Period
- *The Value Supplied For Contributor Type Is Invalid
- *The Value Supplied For Contribution Type Is Invalid
- *Occupation/Business Required When Contribution Is Greater Than \$100

Expenditures

-----Expenditure-----

EXHIBIT 6 (a-f)

Seq	Date	Name	Address	City/State/Zip	Type	Expenditure Purpose	Amount	Amend			
1	04/19/19	MINUTEMAN PRESS	1704 PONCE DE LEON BLVD	CORAL GABLES, FL 3-3134	X	MAILER	\$2,000.00				
		*Invalid Expenditure Type									
2	04/29/19	MINUTEMAN PRESS	1704 PONCE DE LEON BLVD	CORAL GABLES, FL 3-3134	X	MAILER	\$2,000.00				
		*Invalid Expenditure Type									
3	04/30/19	MINUTEMAN PRESS 1704 PONCE DE LEON BLVD	→	CORAL GABLES, FL 3-3134	X	MAILER	\$2,000.00				
		*Invalid Expenditure Type									
		*No Address Was Provided									

Fund Transfers

Other Distributions



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

Second Notice

June 6, 2019

Kristopher Guzman, Chairperson for
Floridians For Truth PC
1825 Ponce de Leon Blvd #373
Coral Gables, FL 33134

Re: PAC 73878

Dear Mr. Guzman:

On May 23, 2019, you were advised that one or more of your campaign treasurer 's reports were incomplete and that you had 7 days to provide the requested information.

The Division's electronic filing system indicates that the required information has not been provided. Pursuant to Section 106.22, Florida Statutes, the Division is required to notify the Florida Elections Commission of the failure to provide information required by Chapter 106. Accordingly, if the information requested in our prior notice is not received within 7 days of receipt of this letter, we will refer this matter to the Commission. A second copy of the error report is attached for your convenience.

Sincerely,

Kristi Reid Willis, Chief
Bureau of Election Records

Attachment

Error Report

Committee: Floridians For Truth PC

Type: PAC - BOT

Report: 2019 M4 (6) Covering Period: 4/1/19 - 4/30/19

Account: 73878

Contributions

		Contributor			Contribution						
Seq	Date	Name	Address	City/State/Zip	Type	Occupation	Type	Amount	InKind	Descrip	Amend
1		BUILDING A BRIGHTER FUTURE FOR FLORIDA	2055 NW DIAMOND CREEK WAY	JENSEN BEACH, FL 3-4957	X		X	\$4,000.00			

- *The Transaction Date Is Either Before Or After The Report Coverage Period
- *The Value Supplied For Contributor Type Is Invalid
- *The Value Supplied For Contribution Type Is Invalid
- *Occupation/Business Required When Contribution Is Greater Than \$100

Expenditures

Seq	Date	Name	Address	City/State/Zip	Type	Expenditure Purpose	Amount	Amend			
1	04/19/19	MINUTEMAN PRESS	1704 PONCE DE LEON BLVD	CORAL GABLES, FL 3-3134	X	MAILER	\$2,000.00				
		*Invalid Expenditure Type									
2	04/29/19	MINUTEMAN PRESS	1704 PONCE DE LEON BLVD	CORAL GABLES, FL 3-3134	X	MAILER	\$2,000.00				
		*Invalid Expenditure Type									
3	04/30/19	MINUTEMAN PRESS	1704 PONCE DE LEON BLVD	CORAL GABLES, FL 3-3134	X	MAILER	\$2,000.00				
		*Invalid Expenditure Type									
		*No Address Was Provided									

EXHIBIT 7 (a) (2)

Fund Transfers

Other Distributions



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee

Secretary of State

DIVISION OF ELECTIONS

FINAL NOTICE

Delivery Confirmation:

USPS TRACKING #
& CUSTOMER
RECEIPT

9114 9023 0722 4129 6178 53

For Tracking or inquiries go to USPS.com
or call 1-800-222-1811

June 18, 2019

Kristopher Guzman, Chairperson for
Floridians For Truth PC
1825 Ponce de Leon Blvd #373
Coral Gables, FL 33134

Re: PAC 73878

Dear Mr. Guzman:

You have previously been advised that one or more campaign treasurer's reports are incomplete for the reasons noted in the attached error report.

Pursuant to Section 106.07(2), Florida Statutes, you have 7 days from receipt of this letter to correct errors or provide missing information. If the information has been reported accurately, you must provide a written explanation to the Division addressing the issue noted in the error report. Please be advised that if you fail to comply with this request, the Division will forward this matter to the Florida Elections Commission for further action. Section 106.265(1), Florida Statutes, authorizes the Florida Elections Commission to impose civil penalties of up to \$1,000 per violation.

If you need assistance in filing an amendment, please contact the Division's help line at (850) 245-6280.

Sincerely,

Kristi Reid Willis, Chief
Bureau of Election Records

Attachment

EXHIBIT

8 (1 of 3)

Error Report

Committee: Floridians For Truth PC

Type: PAC - BOT

Report: 2019 M4 (6) Covering Period: 4/1/19 - 4/30/19

Account: 73878

Contributions

Contributor				Contribution							
Seq	Date	Name	Address	City/State/Zip	Type	Occupation	Type	Amount	InKind	Descr	Amend
1		BUILDING A BRIGHTER FUTURE FOR FLORIDA	2055 NW DIAMOND CREEK WAY	JENSEN BEACH, FL 3-4957	X		X	\$4,000.00			

- *The Transaction Date Is Either Before Or After The Report Coverage Period
- *The Value Supplied For Contributor Type Is Invalid
- *The Value Supplied For Contribution Type Is Invalid
- *Occupation/Business Required When Contribution Is Greater Than \$100

Expenditures

Seq	Date	Name	Address	City/State/Zip	Type	Expenditure Purpose	Amount	Amend			
1	04/19/19	MINUTEMAN PRESS	1704 PONCE DE LEON BLVD	CORAL GABLES, FL 3-3134	X	MAILER	\$2,000.00				
		*Invalid Expenditure Type									
2	04/29/19	MINUTEMAN PRESS	1704 PONCE DE LEON BLVD	CORAL GABLES, FL 3-3134	X	MAILER	\$2,000.00				
		*Invalid Expenditure Type									
3	04/30/19	MINUTEMAN PRESS 1704 PONCE DE LEON BLVD		CORAL GABLES, FL 3-3134	X	MAILER	\$2,000.00				
		*Invalid Expenditure Type									
		*No Address Was Provided									

EXHIBIT

8 (9 of 3)

Fund Transfers

Other Distributions

USPS Tracking® FAQs > (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

Track Another Package +

Tracking Number: 9114902307224129617853

Remove X

Expected Delivery on

THURSDAY

20 JUNE 2019 i by **8:00pm** i

Feedback

✓ Delivered

June 20, 2019 at 4:13 pm
Delivered, Front Desk/Reception/Mail Room
MIAMI, FL 33134

Get Updates **∨**

Text & Email Updates **∨**

Tracking History **∨**

Product Information **∨**

See Less **∧**

EXHIBIT 8(3 of 3)

**National Subpoena Processing
Mail Code IN1-4054
7610 West Washington Street
Indianapolis, Indiana 46231**

11/26/2019

Cedric Oliver
FLORIDA ELECTIONS COMMISSION
Collins Building, Suite 224
107 W. Gaines Street,
Tallahassee, FL 32399-1050

**Case Name: IN RE: FFTPC
Case No.: FEC19-076, 19-076-46
JPMorgan Chase File No.: SB1028813-F2**

Dear Sir/Madam:

We have received a subpoena and/or request for the matter referenced above. Based on the information you provided in the request, a good faith search was conducted for information or records related to the named subject(s). However, we were unable to locate records responsive to the subpoena and/or request.

We understand we have complied with this subpoena and/or request to the best of our ability and will not need to appear. At this time we will consider this subpoena and/or request closed unless we hear further from you.

If you have questions, please call our Customer Service Center at 1-844-751-7728. We're here to help Monday through Friday from 8:30 a.m. to 7:00 p.m. Eastern Time.

Sincerely,

Leah Lucas
Operations Manager, VP
Chase Customer Service

JPMorgan Chase, N.A. Member FDIC
SUBP22

EXHIBIT 9

11/26/2019 10:55:00 AM
SUBPOENA
SB1028813-F2

Cedric Oliver

From: Willis, Kristi R. (Bronson) <Kristi.Willis@DOS.MyFlorida.com>
Sent: Monday, December 2, 2019 10:33 AM
To: Cedric Oliver
Subject: RE: Acct #73878

No.

From: Cedric Oliver <Cedric.Oliver@myfloridalegal.com>
Sent: Monday, November 25, 2019 10:59 AM
To: Willis, Kristi R. (Bronson) <Kristi.Willis@DOS.MyFlorida.com>
Subject: Acct #73878

EMAIL RECEIVED FROM EXTERNAL SOURCE

Good morning Kristi! Has this committee properly amended their 2019 M4 and 2019 M5 Reports at this time? Are they considered correct and complete?

EXHIBIT 10

Account: 73878

Floridians For Truth PC

Rpt Seq: 6

<i>ProcessDescription</i>	<i>Status</i>	<i>Submitter</i>	<i>Created</i>	<i>LastUpdate</i>
Create Pending Report	Processing Complete	73878	5/10/2019 2:36:51 PM	5/10/2019 2:36:51 PM
Recalc Pending Report Total	Processing Complete	73878	5/10/2019 2:47:25 PM	5/10/2019 2:47:25 PM
File Pending Report	Processing Complete	73878	5/10/2019 2:51:26 PM	5/10/2019 2:51:26 PM
Review Filed Report	Processing Complete	ealustria	5/16/2019 2:25:26 PM	5/16/2019 2:25:26 PM
Review Filed Report	Processing Complete	ealustria	5/22/2019 2:39:30 PM	5/22/2019 2:39:30 PM

EXHIBIT 11 (1 of 4)



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Florida Department of State - Division of Elections

Florida Election System Reports

Candidate/Committee Lookup

Name:

Election:

Acct:

Type:

Committee Name: Floridians For Truth PC
 Account: 73878

Date Due	Type	Date Filed	Status	Days Late	Fine Assessed	Appealed	Amount Fined	Amount Paid
1/10/2020	M12	1/11/2020	CLO	1	\$0.00		\$0.00	\$0.00
12/10/2019	M11	12/10/2019						
11/12/2019	M10	11/12/2019						
10/10/2019	M9	10/10/2019						
9/10/2019	M8	9/9/2019						
8/12/2019	M7	8/9/2019						
7/10/2019	M6	7/11/2019	CLO	1	\$0.00		\$0.00	\$0.00
6/10/2019	M5	6/7/2019						
5/10/2019	M4	5/10/2019						
4/10/2019	M3	4/9/2019						
3/11/2019	M2	3/8/2019						
2/11/2019	M1	2/6/2019						
1/10/2019	M12		FEC	0	\$0.00		\$0.00	\$0.00
12/10/2018	M11		FEC	0	\$0.00		\$0.00	\$0.00
11/2/2018	G7		FEC	0	\$0.00		\$0.00	\$0.00
11/1/2018	D6		FEC	0	\$0.00		\$0.00	\$0.00
10/31/2018	D5		FEC	0	\$0.00		\$0.00	\$0.00
10/30/2018	D4		FEC	0	\$0.00		\$0.00	\$0.00
10/29/2018	D3		FEC	0	\$0.00		\$0.00	\$0.00
10/28/2018	D2		FEC	0	\$0.00		\$0.00	\$0.00
10/27/2018	D1	2/15/2019	CLO	111	\$0.00		\$0.00	\$0.00
10/26/2018	G6	10/26/2018						

EXHIBIT 11 (2 of 4)



**Florida Department of State
Division of Elections**

Floridians For Truth PC

Campaign Finance Activity

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

	Filing Period	Contributions			Expend	Other	Transfers
		Monetary	Loans	InKind			
<input type="radio"/>	10/13/2018 - 10/19/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	10/20/2018 - 10/26/2018	0.00	0.00	0.00	0.00	0.00	0.00
W	01/01/2019 - 01/31/2019	0.00	0.00	0.00	0.00	0.00	0.00
W	02/01/2019 - 02/28/2019	0.00	0.00	0.00	0.00	0.00	0.00
<input type="radio"/>	03/01/2019 - 03/31/2019	10,000.00	0.00	0.00	3,815.66	0.00	0.00
<input type="radio"/>	04/01/2019 - 04/30/2019	4,000.00	0.00	0.00	6,000.00	0.00	0.00
<input type="radio"/>	05/01/2019 - 05/31/2019	9,175.00	0.00	0.00	13,285.00	0.00	0.00
W	06/01/2019 - 06/30/2019	0.00	0.00	0.00	0.00	0.00	0.00
W	07/01/2019 - 07/31/2019	0.00	0.00	0.00	0.00	0.00	0.00
W	08/01/2019 - 08/31/2019	0.00	0.00	0.00	0.00	0.00	0.00
<input type="radio"/>	09/01/2019 - 09/30/2019	10,000.00	0.00	0.00	10,000.00	0.00	0.00
<input type="radio"/>	10/01/2019 - 10/31/2019	40,000.00	0.00	0.00	30,075.00	0.00	0.00
<input type="radio"/>	11/01/2019 - 11/30/2019	0.00	0.00	0.00	50,000.00	0.00	0.00
W	12/01/2019 - 12/31/2019	0.00	0.00	0.00	0.00	0.00	0.00
<input checked="" type="radio"/>	All Dates (Totals)	73,175.00	0.00	0.00	113,175.66	0.00	0.00

Note: (E) indicates that report was filed electronically

X Indicates that detail has not been released

W Indicates that a waiver was filed and **L** Indicates that a loan report was filed

Select Detail Type

Contributions ▼

Select Sort Order

Date(Ascending) ▼

Select Output Type

Display On Screen ▼

EXHIBIT 11 (3 of 4)

Submit Query Now

Query the Campaign Finance Data Base

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

EXHIBIT 11(4 of 4)

**FLORIDA ELECTIONS COMMISSION
PHONE LOG
Case No.: FEC 19-431**

Respondent: Kristopher Guzman

Complainant: Division of Elections

1. **Date and time:** August 5, 2019 @ 4:00 pm
Name: Respondent
Phone #: (305) 699-5054
Summary: I attempted telephone contact to inquire about allegations and overdue questionnaire-affidavit. I left a message to return my call.
Memo to File? No
Entered by: CKO

2. **Date and time:** November 25, 2019 @ 11:30 am
Name: Respondent
Phone #: (305) 699-5054
Summary: I attempted telephone contact to inquire about allegations. I left a message to return my call.
Memo to File? No
Entered by: CKO

3. **Date and time:** November 25, 2019 @ 11:30 am
Name: Shonnan Coles—Bank rep
Phone #: (317) 757-7457
Summary: I had telephone contact to inquire about the status of overdue subpoenaed information. Ms. Coles stated that she would need additional information, ie: mailing address, phone #. I was instructed to fax over this requested additional information to (866) 859-8592. I thanked her for her assistance with this matter.
Memo to File? No
Entered by: CKO

4. **Date and time:** January 9, 2019 @ 11:55 am
Name: Respondent
Phone #: (305) 699-5054
Summary: I attempted telephone contact to complete final interview. I left a message to return my call.
Memo to File? No
Entered by: CKO

EXHIBIT 1a



FLORIDA ELECTIONS COMMISSION

107 W. Gaines Street
Collins Building, Suite 224
Tallahassee, Florida 32399-1050
Telephone: (850) 922-4539
Fax: (850) 921-0783

www.fec.state.fl.us; fec@myfloridalegal.com

August 7, 2019

Kristopher Guzman
1825 Ponce de Leon Blvd #373
Coral Gables, FL 33134

RE: Case No.: FEC 19-431; Respondent: Kristopher Guzman

Dear Mr. Guzman:

On July 8, 2019, the Florida Elections Commission received a complaint alleging that you violated Florida's election laws. I have reviewed the complaint and find that it contains one or more **legally sufficient allegations**. The Commission staff will investigate the following alleged violation:

Section 106.07(2)(b)1., Florida Statutes: Respondent, Chairman, Treasurer, and Registered Agent for Floridians for Truth PC, a political committee registered with the Division of Elections, failed to timely make necessary amendments to the following campaign treasurer report, as alleged in the complaint:

- 2019 M4

When we conclude the investigation, a copy of the Report of Investigation (ROI) will be mailed to you at the above address. Based on the results of the investigation, a staff attorney will make a written recommendation (Staff Recommendation or SR) to the Commission as to whether there is probable cause to charge respondent with violating Chapters 104 or 106, Florida Statutes. You will have an opportunity to respond to both the ROI and the SR. The Commission will then hold one or more hearings to determine whether the alleged violations occurred and, if so, the amount of the fine to be imposed. You and the complainant will receive notice at least 14 days before any hearing at which your case is to be considered.

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

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

Kristopher Guzman
August 7, 2019
Page 2
FEC 19-431

If you have additional questions, please contact **Cedric Oliver**, the investigator assigned to this case.

Sincerely,

A handwritten signature in cursive script that reads "Tim Vaccaro". The signature is written in black ink and has a long horizontal flourish extending to the right.

Tim Vaccaro
Executive Director

TV/med

**DIVISION OF ELECTIONS
FEC NOTICE FORM**

To FEC from Division of Elections

Name: Floridians For Truth PC
Account Number: 73878
Chairperson: Kristopher Guzman
Treasurer: Kristopher Guzman
Registered Agent: Kristopher Guzman

The Division of Elections hereby provides this notice to the Florida Elections Commission pursuant to sections 106.22(7) and 106.25, Florida Statutes. An apparent violation of Chapter 106, F.S., has occurred based upon a failure to file addendums after notice as required by section 106.07(2), Florida Statutes, for the following report:

2019 M4

- Floridians For Truth PC (73878) a political committee registered with the Division has failed to make the necessary amendments to the 2019 M4 report or provide a written explanation regarding the same.
- On October 18, 2018, the organization was registered and placed in an active status with the Division, and has remained active since that date. Kristopher Guzman is the chairperson, treasurer, and registered agent.
- On May 23, 2019, the Division mailed Mr. Guzman notification that one or more campaign treasurer's reports were incomplete.
- On June 6, 2019, the Division mailed Mr. Guzman notification that one or more campaign treasurer's reports were incomplete.
- On June 18, 2019, the Division mailed Mr. Guzman final notification with delivery confirmation that one or more campaign treasurer's reports were incomplete. (See attached letter and delivery confirmation.)

- As of July 5, 2019, one or more campaign treasurer's reports remain incomplete.

Sent By: Kristi Reid Willis
Date: July 5, 2019 *KRW*

ejr



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

FINAL NOTICE

Delivery Confirmation:

USPS TRACKING # 9114 9023 0722 4129 6178 53
& CUSTOMER RECEIPT For Tracking or inquiries go to USPS.com
or call 1-800-222-1811

June 18, 2019

Kristopher Guzman, Chairperson for
Floridians For Truth PC
1825 Ponce de Leon Blvd #373
Coral Gables, FL 33134

Re: PAC 73878

Dear Mr. Guzman:

You have previously been advised that one or more campaign treasurer's reports are incomplete for the reasons noted in the attached error report.

Pursuant to Section 106.07(2), Florida Statutes, you have 7 days from receipt of this letter to correct errors or provide missing information. If the information has been reported accurately, you must provide a written explanation to the Division addressing the issue noted in the error report. Please be advised that if you fail to comply with this request, the Division will forward this matter to the Florida Elections Commission for further action. Section 106.265(1), Florida Statutes, authorizes the Florida Elections Commission to impose civil penalties of up to \$1,000 per violation.

If you need assistance in filing an amendment, please contact the Division's help line at (850) 245-6280.

Sincerely,

A handwritten signature in black ink that reads "Kristi Reid Willis".

Kristi Reid Willis, Chief
Bureau of Election Records

Attachment

Error Report

Committee: Floridians For Truth PC

Type: PAC - BOT

Report: 2019 M4 (6) Covering Period: 4/1/19 - 4/30/19

Account: 73878

ContributionsContributorContribution

<u>Seq</u>	<u>Date</u>	<u>Name</u>	<u>Address</u>	<u>City/State/Zip</u>	<u>Type</u>	<u>Occupation</u>	<u>Type</u>	<u>Amount</u>	<u>InKind</u>	<u>Descrip</u>	<u>Amend</u>
1		BUILDING A BRIGHTER FUTURE FOR FLORIDA	2055 NW DIAMOND CREEK WAY	JENSEN BEACH, FL 34957	X		X	\$4,000.00			

*The Transaction Date Is Either Before Or After The Report Coverage Period

*The Value Supplied For Contributor Type Is Invalid

*The Value Supplied For Contribution Type Is Invalid

*Occupation/Business Required When Contribution Is Greater Than \$100

Expenditures

<u>Seq</u>	<u>Date</u>	<u>Name</u>	<u>Address</u>	<u>City/State/Zip</u>	<u>Type</u>	<u>Expenditure Purpose</u>	<u>Amount</u>	<u>Amend</u>			
1	04/19/19	MINUTEMAN PRESS	1704 PONCE DE LEON BLVD	CORAL GABLES, FL 33134	X	MAILER	\$2,000.00				
		*Invalid Expenditure Type									
2	04/29/19	MINUTEMAN PRESS	1704 PONCE DE LEON BLVD	CORAL GABLES, FL 33134	X	MAILER	\$2,000.00				
		*Invalid Expenditure Type									
3	04/30/19	MINUTEMAN PRESS 1704 PONCE DE LEON BLVD		CORAL GABLES, FL 33134	X	MAILER	\$2,000.00				
		*Invalid Expenditure Type									
		*No Address Was Provided									

Fund Transfers**Other Distributions**

USPS Tracking® FAQs > (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

Track Another Package +

Tracking Number: 9114902307224129617853

Remove X

Expected Delivery on

THURSDAY

20 JUNE 2019 ⓘ | by **8:00pm** ⓘ

Feedback

 **Delivered**

June 20, 2019 at 4:13 pm
Delivered, Front Desk/Reception/Mail Room
MIAMI, FL 33134

Get Updates ▾

Text & Email Updates ▾

Tracking History ▾

Product Information ▾

See Less ^

**FLORIDA DEPARTMENT OF STATE, DIVISION OF ELECTIONS
CAMPAIGN TREASURER'S REPORT SUMMARY**

(1) Floridians For Truth PC (2) 73878
 Candidate, Committee or Party Name I.D. Number

(3) 1825 Ponce de Leon Blvd #373 Coral Gables FL 33134
 Address (number and street) City State Zip Code

Check box if address has changed since last report

(4) Check appropriate box(es):

Candidate (office sought):
 Political Committee Check If PC has DISBANDED
 Committee of Continuous Existence Check If CCE has DISBANDED
 Party Executive Committee

(5) REPORT IDENTIFIERS

Cover Period: From 04/01/2019 To 04/30/2019 Report Type: M4

Original Amendment Special Election Report

(6) CONTRIBUTIONS THIS REPORT

Cash & Checks	\$4,000.00
Loans	\$0.00
<i>Total Monetary</i>	\$4,000.00
In-Kind	\$0.00

(7) EXPENDITURES THIS REPORT

Monetary Expenditures	\$6,000.00
Transfers to Office Account	\$0.00
<i>Total Monetary</i>	\$6,000.00

(8) Other Distributions

Certification

It is a first degree misdemeanor for any person to falsify a public record (ss.839.13, F.S.)

I certify that I have examined this report and it is true, correct and complete

Name of Treasurer Deputy Treasurer

X
Signature

I certify that I have examined this report and it is true, correct and complete

Name of Candidate Chairman (PC/PTY Only)

X
Signature

Name: Floridians For Truth PC

Report: 2019 M4

Period: 04/01/2019 to 04/30/2019 .

**** Records in Filed Report ****

Seq #	Full Name (Last, Suffix, First, Middle)	Contributor	Occupation	Amount
Date	Street Address & City, State, Zip	Type	In-Kind Description	Amend
* 1	BUILDING A BRIGHTER FUTURE FOR FLORIDA 2055 NW DIAMOND CREEK WAY JENSEN BEACH, FL 34957	X		\$4,000.00
		X		

Name: Floridians For Truth PC

Report: 2019 M4

Period: 04/01/2019 to 04/30/2019

**** Records in Filed Report ****

Seq # Date	Full Name (Last, Suffix, First, Middle Street Address & City, State, Zip)	Type	Purpose	Amount Amend
* 1 04/19/2019	MINUTEMAN PRESS 1704 PONCE DE LEON BLVD CORAL GABLES, FL 33134	X	MAILER	\$2,000.00
* 2 04/29/2019	MINUTEMAN PRESS 1704 PONCE DE LEON BLVD CORAL GABLES, FL 33134	X	MAILER	\$2,000.00
* 3 04/30/2019	MINUTEMAN PRESS 1704 PONCE DE LEON BLVD CORAL GABLES, FL 33134	X	MAILER	\$2,000.00

ID:

CAMPAIGN TREASURER'S REPORT – ITEMIZED FUND TRANSFERS

Name: Floridians For Truth PC

Report: 2019 M4

Period: 04/01/2019 to 04/30/2019

**** Records in Filed Report ****

Seq # Date	Full Name (Last, Suffix, First, Middle Street Address & City, State, Zip	Type	Nature of Account	Amount Amend

ID:

CAMPAIGN TREASURER'S REPORT – ITEMIZED DISTRIBUTIONS

Name: Floridians For Truth PC

Report: 2019 M4

Period: 04/01/2019 to 04/30/2019

**** Records in Filed Report ****

Seq # Date	Full Name (Last, Suffix, First, Middle Street Address & City, State, Zip	Recipient	Purpose	Amount Amend
		Type	Related Expenditure	

Queued Items for 2019-M4

Account: 73878

Floridians For Truth PC

Rpt Seq: 6

<i>ProcessDescription</i>	<i>Status</i>	<i>Submitter</i>	<i>Created</i>	<i>LastUpdate</i>
Create Pending Report	Processing Complete	73878	5/10/2019 2:36:51 PM	5/10/2019 2:36:51 PM
Recalc Pending Report Total	Processing Complete	73878	5/10/2019 2:47:25 PM	5/10/2019 2:47:25 PM
File Pending Report	Processing Complete	73878	5/10/2019 2:51:26 PM	5/10/2019 2:51:26 PM
Review Filed Report	Processing Complete	ealustria	5/16/2019 2:25:26 PM	5/16/2019 2:25:26 PM
Review Filed Report	Processing Complete	ealustria	5/22/2019 2:39:30 PM	5/22/2019 2:39:30 PM

Report Detail

Account/Seq 73878 1

Election/Type
20201103-GEN
PAC

Floridians For Truth PC

Status/Reviewer	Mailed	Type/Recd	R E S P O N S E
SN ejrowlette	1st: 5/23/2019	AUT	
6/18/19 10:55 am	2nd: 6/6/2019	6/20/2019	
	3rd: 6/18/2019		

NOTES: 7/2/19 - Errors not fixed. Recommending FEC referral. Ejr

HISTORY NOTES
Floridians For Truth PC - 73878

Unique ID	Date Recorded	Last Edited Date	Originally Recorded By
61669	10/26/2018 11:05:00 AM		jcsoria
Re: Credentials			
I released the credentials to Mr. Guzman.			
61577	10/23/2018 12:40:00 PM		zjsantos
RE: Credentials			
I left a voicemail for Mr. Guzman to call back for his credentials, I also informed him that his first report is due 10/26/18.			