

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Floridians for Ethics, Accountability and Trust

Case No.: FEC 21-190

TO: Zane C. Matter, Chair
PO Box 702408
St. Cloud, FL 34770-2408

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

NOTICE OF HEARING (INFORMAL HEARING)

A hearing will be held in this case before the Florida Elections Commission on, **May 17, 2023 at 8:30**, or as soon thereafter as the parties can be heard, at the following location: Via Webinar Registration URL:

<https://attendee.gotowebinar.com/register/571953185404345941>

Audio participation:
1-877-309-2074

Attendee – muted:
966-952-589

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

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
May 2, 2023

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

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

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

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

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

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

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

STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION

Florida Elections Commission,
Petitioner,

Case No.: FEC 21-190

v.

Floridians for Ethics, Accountability and Trust,
Respondent.

ORDER OF PROBABLE CAUSE

THIS MATTER was heard by the Florida Elections Commission (Commission) at its regularly scheduled meeting on January 24, 2023, in Tallahassee, Florida.

On October 3, 2022, 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):

Count 1:

On or about June 19, 2020, Floridians for Ethics, Accountability and Trust violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2020 P1 Report.

Count 2:

On or about October 25, 2020, Floridians for Ethics, Accountability and Trust violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2020 D2 Report.

Count 3:

On or about October 26, 2020, Floridians for Ethics, Accountability and Trust violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2020 D3 Report.

Count 4:

On or about October 27, 2020, Floridians for Ethics, Accountability and Trust violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2020 D4 Report.

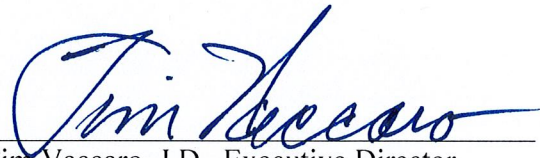
Count 5:

On or about October 28, 2020, Floridians for Ethics, Accountability and Trust violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2020 D5 Report.

Count 6:

On or about October 29, 2020, Floridians for Ethics, Accountability and Trust violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2020 D6 Report.

DONE AND ORDERED by the Florida Elections Commission on January 24, 2023.



Tim Vaccaro, J.D., Executive Director
For Nicholas Primrose, Chairman
Florida Elections Commission

Copies furnished to:
Stephanie J. Cunningham, General Counsel
Floridians for Ethics, Accountability and Trust, 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: Floridians for Ethics, Accountability &
Trust**

Case No.: FEC 21-190

TO: Zane C. Matter, Chair
PO Box 702408
St. Cloud, FL 34770-2408

Division of Elections
500 S. Bronough Street, Room 316
Tallahassee, FL 32399-6596

NOTICE OF HEARING (PROBABLE CAUSE DETERMINATION)

A hearing will be held in this case before the Florida Elections Commission on, **January 24, 2023 at 1:00 p.m., or as soon thereafter as the parties can be heard**, at the following location: Join Zoom Meeting - <https://us06web.zoom.us/j/86542842462?pwd=VjdKeGRjcFAvZko2Y1pTZmo1cU5pdz09>

Meeting ID: 865 4284 2462
Passcode: 5UuWmT

AUDIO PARTICIPATION:
1-301-715-8592
Meeting ID: 865 4284 2462

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

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

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.

Tim Vaccaro

Executive Director
Florida Elections Commission
January 9, 2023

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

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

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

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

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

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

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

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

**In Re: Floridians for Ethics,
Accountability & Trust**

Case No.: FEC 21-190

TO: Floridians for Ethics, Accountability
& Trust
Zane C. Matter, Chair
PO Box 702408
St. Cloud, FL 34770-2408

Division of Elections
500 S. Bronough Street, Room 316
Tallahassee, FL 32399-6596

NOTICE OF CANCELLATION OF HEARING
(PROBABLE CAUSE DETERMINATION)

You are hereby notified that **the previously scheduled hearing for December 14, 2022, is cancelled.** It is anticipated that your case will be heard at the next regularly scheduled meeting, which will be scheduled for a date to be determined in either January 2023 or February 2023.

A Notice of Hearing will be mailed to you approximately 14 days prior to the new hearing date.

Tim Vaccaro

Executive Director
Florida Elections Commission
December 13, 2022

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

**In Re: Floridians for Ethics, Accountability &
Trust**

Case No.: FEC 21-190

TO: Zane C. Matter, Chair
PO Box 702408
St. Cloud, FL 34770-2408

Division of Elections
500 S. Bronough Street, Room 316
Tallahassee, FL 32399-6596

NOTICE OF HEARING (PROBABLE CAUSE DETERMINATION)

A hearing will be held in this case before the Florida Elections Commission on, **December 14, 2022 at 10:30 a.m., or as soon thereafter as the parties can be heard**, at the following location: **House Office Building, 402 South Monroe Street, 306 HOB, Mashburn Hall, Tallahassee, Florida 32399.**

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

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

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.

Tim Vaccaro

Executive Director
Florida Elections Commission
November 30, 2022

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

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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: Floridians for Ethics,
Accountability and Trust**

Case No.: FEC 21-190

STAFF RECOMMENDATION FOLLOWING INVESTIGATION

Pursuant to Section 106.25(4)(c), Florida Statutes, undersigned staff counsel files this written recommendation for disposition of the referral in this case recommending that there is **probable cause** to charge Respondent with violating **Section 106.07(7), Florida Statutes**. Based upon a thorough review of the Report of Investigation submitted on September 8, 2022, the following facts and law support this staff recommendation:

1. On March 5, 2021, the Florida Elections Commission (“Commission”) received a referral from the Department of State, Division of Elections (“Division”), alleging that Floridians for Ethics, Accountability and Trust (“Respondent”) violated Chapter 106, Florida Statutes.
2. Respondent was a political committee formerly registered with the Division. (ROI Exhibits 1 & 3)¹
3. By letter dated March 31, 2021, the Executive Director notified Respondent that Commission staff would investigate the following statutory provision:

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

- 2020 P1
- 2020 D2
- 2020 D3
- 2020 D4
- 2020 D5
- 2020 D6

4. By letter dated December 16, 2019, Kristi Reid Willis, Chief, Bureau of Election Records, sent Respondent a letter acknowledging that the Division had received its Statement of Organization and Appointment of Campaign Treasurer and Designation of Campaign Depository for Political Committees forms. (ROI Exhibit 4, page 1)

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

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

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

7. The *Political Committee Handbook* references the statutory requirement regarding written notification and directs political committees to notify the Division by way of the Division’s electronic filing system. (ROI Exhibit 5, page 2) The *Political Committee EFS User’s Guide* shows the process through which to notify the Division. The user’s guide instructs political committees to select the relevant reporting period and place a checkmark in a box titled “Waiver” to indicate the lack of reportable financial activity. (ROI Exhibit 6, page 2)

8. Respondent failed to notify the filing officer on the prescribed reporting dates that no reports would be filed for the following reporting periods, as set forth in the table below. (ROI Exhibit 7, page 1)

Report	Report Cover Period	Date Notification Due	Date Notification Filed	No. of Days Late
2020 P1	6/1/20 – 6/12/20	6/19/20	6/20/20	1
2020 D2	10/24/20	10/25/20	10/30/20	5
2020 D3	10/25/20	10/26/20	10/30/20	4
2020 D4	10/26/20	10/27/20	10/30/20	3
2020 D5	10/27/20	10/28/20	10/30/20	2
2020 D6	10/28/20	10/29/20	10/30/20	1

9. Zane C. Matter, chairperson and treasurer for Respondent, stated that he failed to timely file the notices of no activity as he was unaware of the reporting dates. (ROI Exhibit 8)

10. “Probable Cause” is defined as reasonable grounds of suspicion supported by circumstances sufficiently strong to warrant a cautious person in the belief that the person has committed the offense charged. *Schmitt v. State*, 590 So. 2d 404, 409 (Fla. 1991). Probable cause exists where the facts and circumstances, of which an [investigator] has reasonably trustworthy information, are sufficient in themselves for a reasonable man to reach the conclusion that an offense has been committed. *Department of Highway Safety and Motor Vehicles v. Favino*, 667 So. 2d 305, 309 (Fla. 1st DCA 1995).

11. The facts set forth above show that Respondent was a political committee formerly registered with the Division. Respondent failed to notify the filing officer on the prescribed reporting dates that no reports would be filed for the following reporting periods: 2020 P1, 2020 D2, 2020 D3, 2020 D4, 2020 D5, and 2020 D6.

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 19, 2020, Floridians for Ethics, Accountability and Trust violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2020 P1 Report.

Count 2:

On or about October 25, 2020, Floridians for Ethics, Accountability and Trust violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2020 D2 Report.

Count 3:

On or about October 26, 2020, Floridians for Ethics, Accountability and Trust violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2020 D3 Report.

Count 4:

On or about October 27, 2020, Floridians for Ethics, Accountability and Trust violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2020 D4 Report.

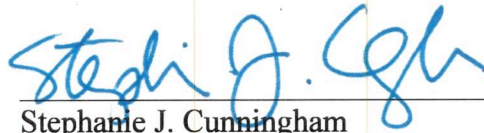
Count 5:

On or about October 28, 2020, Floridians for Ethics, Accountability and Trust violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2020 D5 Report.

Count 6:

On or about October 29, 2020, Floridians for Ethics, Accountability and Trust violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2020 D6 Report.

Respectfully submitted on October 3, 2022.



Stephanie J. Cunningham
General Counsel

I reviewed this Staff Recommendation this 4th day of October 2022.



Tim Vaccaro
Executive Director

FLORIDA ELECTIONS COMMISSION

Report of Investigation for Failure to Notify Filing Officer

Case Number: FEC 21-190

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

Respondent: Floridians for Ethics, Accountability and Trust

Respondent's Atty: N/A

Division of Elections (Division)

Referral Filed: March 5, 2021

Respondent Type: Political Committee

I. Preliminary Information:

1. Respondent was a political committee formerly registered with the Division. To review the disbandment letter, refer to Exhibit 1.

2. An Appointment of Campaign Treasurer and Designation of Campaign Depository (DS-DE 6) was filed on December 12, 2019. Zane C. Matter was appointed as campaign treasurer. To review the DS-DE 6, refer to Exhibit 2.

3. A Statement of Organization (DS-DE 5) for the political committee was filed with the Division on December 12, 2019. To review the Statement of Organization, refer to Exhibit 3.

4. An acknowledgement letter was mailed to the address provided on the DS-DE 6 on December 16, 2019, advising Respondent that all political committees filing reports with the Division are required to file by means of the Division's electronic filing system (EFS). Respondent was provided with a user identification number and initial password allowing access to the EFS.

5. The acknowledgement letter also advised Respondent that all of the Division's publications and reporting forms are available on their website, including Chapter 106, Florida Statutes, the *Political Committee Handbook*, and the *Calendar of Reporting Dates*. The letter further advised that it was Respondent's responsibility to read, understand, and follow the requirements of Florida's election laws. To review the acknowledgement letter, refer to Exhibit 4.

6. The *Political Committee Handbook* discusses filing a waiver when there is no activity to disclose. To review the relevant page of the *Handbook*, refer to Exhibit 5.

7. The *Political Committee EFS User's Guide* discusses how to notify the Division on the prescribed reporting date that no report will be filed using the EFS. Specifically, the *Handbook* instructs the user to click the box next to "waiver" if there is no activity to disclose. To review the relevant pages from the *EFS User's Guide*, refer to Exhibit 6.

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

8. I investigated whether Respondent violated this section of the election laws by not timely notifying the filing officer, in writing, that no report(s) would be filed due to not receiving any contributions or making expenditures during the following reporting period(s). To review Respondent's filing history reflecting the untimely filed notification(s) summarized below, refer to Exhibit 7.

Report	Report Cover Period	Date Notification Due	Date Notification Filed	No. of Days Late
2020 P1	6/1/20 – 6/12/20	6/19/20	6/20/20	1
2020 D2	10/24/20	10/25/20	10/30/20	5
2020 D3	10/25/20	10/26/20	10/30/20	4
2020 D4	10/26/20	10/27/20	10/30/20	3
2020 D5	10/27/20	10/28/20	10/30/20	2
2020 D6	10/28/20	10/29/20	10/30/20	1

9. Respondent did respond to the referral. Mr. Matter stated, “I failed to file these reports in a timely manner as I was unaware on reports P1, D2, D3, D4, D5 & D6 that the reporting dates were so close in time and needed to be filed so quickly in the system. Due to the circumstances and fact there was no reported activity on any of these reports, I request that the Florida Elections Commission assess no fines or penalties in this matter. I have since requested that the PAC be closed due to no further activity.” To review Respondent’s response, refer to Exhibit 8.

10. I attempted to contact Respondent’s Chairperson on three occasions for the purpose of providing an opportunity to discuss the allegations made in the referral. As of the date of this report, my telephone calls have not been returned. Therefore, I am unable to ascertain whether he has read Chapter 106, Florida Statutes, and/or the *Political Committee Handbook*. To review the phone log, refer to Exhibit 9.

SIGNATURE OF INVESTIGATOR:



Date: September 8, 2022

Zane C. Matter, Chairperson
Floridians for Ethics, Accountability & Trust
PO BOX 702408
Saint Cloud, FL 34770

RECEIVED
2021 MAR 17 AM 9:34

March 10, 2021

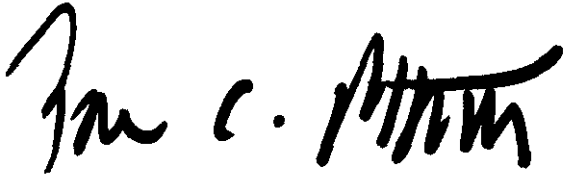
Florida Department of State Div. of Elections
R.A. Gray Building
500 S. Bronough St.
Tallahassee, FL 32399

RE: Floridians for Ethics, Accountability & Trust PAC
Number 74826

Dear Sir/Madam,

I request that this account be closed and a final termination report be issued for this PAC. There will be no further activity in the future for this PAC.

Thank you.





FLORIDA DEPARTMENT *of* STATE

RON DESANTIS
Governor

LAUREL M. LEE
Secretary of State

March 18, 2021

Zane C. Matter, Chairperson
Floridians for Ethics, Accountability and Trust (74826)
Post Office Box 702408
Saint Cloud, Florida 34770

Dear Mr. Matter:

This will acknowledge receipt of your committee's letter informing us of the disbandment of **Floridians for Ethics, Accountability and Trust** as a political committee. This information has been placed on file in our office. Your final report (2021 M3) may be filed at any time but is due no later than **April 12, 2021**. This report must be filed via the Division's Electronic Filing System (EFS). If you have no activity to report, you are still required to file a waiver. Should you need to file amendments after the final report has been filed, please contact our office to have your account activated.

If you have any questions, or if we may be of further assistance to you at any time, please do not hesitate to call (850) 245-6280.

Sincerely,

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

Kristi Reid Willis, Chief
Bureau of Election Records

KRW/zjs

RECEIVED
 DEPARTMENT OF
 2019 DEC 12 AM 9:02
 DIVISION OF

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

CHECK APPROPRIATE BOX:

Initial Filing for: Primary Treasurer Deputy Treasurer

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

OFFICE USE ONLY

1. Committee Floridians for Ethics, Accountability & Trust	2. Telephone (863) 399-2967
---	----------------------------------

3. Name of Treasurer or Deputy Treasurer Zane C. Matter	4. Email (optional)	5. Telephone (optional) ()
--	---------------------	--------------------------------

6. Mailing Address
PO BOX 702408 Saint Cloud, FL 34770

7. Street Address
PO BOX 702408 Saint Cloud, FL 34770

8. The following bank has been designated as the Primary Depository Secondary Depository

9. Name of Bank Suntrust Bank	10. Street Address 200 S. Orange Ave
----------------------------------	---

11. City Orlando	12. State FL	13. Zip Code 32801
---------------------	-----------------	-----------------------

14. Signature of Chairman <i>X Zane C. Matter</i>	15. Name of Chairman (Print or Type) Zane C. Matter
--	--

Campaign Treasurer's Acceptance of Appointment

Zane C. Matter

I, _____, do hereby accept the appointment as
 (Please Print or Type)
 treasurer or deputy treasurer for Floridians for Ethics, Accountability & Trust
 (Committee)

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

12/09/2019 Date *X Zane C. Matter* Signature of Campaign Treasurer or Deputy Treasurer

RECEIVED
DEPARTMENT OF STATE

OFFICE USE ONLY
2019 DEC 12 AM 9:02

FLORIDA
DIVISION OF ELECTIONS

STATEMENT OF ORGANIZATION OF POLITICAL COMMITTEE

(PLEASE TYPE)

1. Full Name of Committee

Floridians for Ethics, Accountability & Trust

Telephone

863-399-2967

Mailing Address (include city, state and zip code)

PO BOX 702408

Saint Cloud, FL 34770

Street Address (include city, state and zip code)

PO BOX 702408

Saint Cloud, FL 34770

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 political committee to support or oppose seeking Multi-County, Legislative, County, Municipal office and other activity not prohibited by chapter 106 F.S.

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

Political

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
Zane C. Matter	PO BOX 702408 Saint Cloud, FL 34770	Treasurer

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	
Zane C. Matter	PO BOX 702408 Saint Cloud, FL 34770	Chairman	
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, committees and others 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	
Suntrust Bank		200 S. Orange Ave Orlando FL, 32801	
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
N/A			
STATE OF <u>Florida</u> COUNTY <u>Osceola</u>			
I, <u>Zane C. Matter</u> , certify that the information in this Statement of			
Organization is complete, true and correct.			
<input checked="" type="checkbox"/> <u>Zane C. Matter</u>		<u>12/09/2019</u>	
Signature of Chairman of Political Committee		Date	



FLORIDA DEPARTMENT *of* STATE

RON DESANTIS
Governor

LAUREL M. LEE
Secretary of State

December 16, 2019

Zane C. Matter, Chairperson
Floridians for Ethics, Accountability and Trust
Post Office Box 702408
Saint Cloud, Florida 34770

Dear Mr. Matter:

This will acknowledge receipt of the Statement of Organization and Appointment of Campaign Treasurer and Designation of Campaign Depository for **Floridians for Ethics, Accountability and Trust**, which were placed on file in our office on December 13, 2019. 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 **January 10, 2020**. The report will cover the period of December 1-31, 2019 (2019 M12). All political committees that file reports with the Division of Elections are required to file by means of the Division's Electronic Filing System (EFS).

EFS Access

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

EFS Website Address: <https://efs.dos.state.fl.us>
Identification Number: 74826

Timely Filing

All reports must be completed and filed through the EFS no later than midnight, Eastern Standard Time, of the due date. Reports not filed by midnight of the due date are late filed and subject to the penalties in Section 106.07(8), Florida Statutes. In the event that the EFS is inoperable on the

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](https://dos.mylouisiana.com/elections)



Zané C. Matter, Chairperson
December 16, 2019
Page Two

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

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

Electronic Receipts

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

Instructions and Assistance

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

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

Please let me know if you need additional information.

Sincerely,



Kristi Reid Willis, Chief
Bureau of Election Records

KRW/zjs

Enclosures

Political Committee Handbook

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



(Rev. 9/27/2019)

Any political committee required to file reports with a filing officer other than the Division must file reports on the 60th day immediately preceding the primary election and bi-weekly on each Friday thereafter through and including the 4th day immediately preceding the general election, with additional reports due on the 25th and 11th days before the primary election and the general election.

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

Reports filed with the Division through the [Electronic Filing System \(EFS\)](#) are due no later than midnight, Eastern Time, of the due date.

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

Penalty for Late Filing

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

(Section [106.07\(8\)](#), Fla. Stat.)

Notice of No Activity

When there has been no reportable activity in the campaign account during a reporting period (no funds expended or received) the filing of the report is waived. However, the political committee **must notify the filing officer in writing on or before the prescribed reporting date that no report is being filed on that date.** (A notice of no activity filed with the Division must be filed electronically using the [EFS](#).) The next report filed must specify that the report covers the entire period between the last submitted report and the report being filed.

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

**Department of State
Division of Elections**

Political Committee EFS User's Guide



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

EFS HELP LINE: 850-245-6280

January 2011

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

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

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

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

*******NOTE*******

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

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

Click at the bottom of the screen. A **Report Detail** screen (view only) will appear. This screen will not indicate any activity until individual detail data is entered, saved and a review is performed.

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

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

Review Messages

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



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Florida Department of State - Division of Elections

Florida Election System Reports

Candidate/Committee Lookup

Committee Name: Floridians for Ethics, Accountability and Trust

Name:

Account: 74826

Election:

Acct:

Type:

Date Due	Type	Date Filed	Status	Days Late	Fine Assessed	Appealed	Amount Fined	Amount Paid
4/12/2021	M3	4/2/2021						
3/10/2021	M2	3/10/2021						
2/10/2021	M1	2/1/2021						
1/11/2021	M12	1/2/2021						
12/10/2020	M11	12/8/2020						
11/10/2020	M10	11/8/2020						
10/30/2020	G6	10/30/2020						
10/29/2020	D6	10/30/2020	FEC	1	\$0.00		\$0.00	\$0.00
10/28/2020	D5	10/30/2020	FEC	2	\$0.00		\$0.00	\$0.00
10/27/2020	D4	10/30/2020	FEC	3	\$0.00		\$0.00	\$0.00
10/26/2020	D3	10/30/2020	FEC	4	\$0.00		\$0.00	\$0.00
10/25/2020	D2	10/30/2020	FEC	5	\$0.00		\$0.00	\$0.00
10/24/2020	D1	10/23/2020						
10/23/2020	G5	10/23/2020						
10/16/2020	G4A	10/9/2020						
10/9/2020	G4	10/5/2020						
10/2/2020	G3A	9/28/2020						
9/25/2020	G3	9/18/2020						
9/18/2020	G2A	9/11/2020						
9/11/2020	G2	9/5/2020						
9/4/2020	G1A	8/28/2020						
8/28/2020	G1	8/21/2020						
8/21/2020	P7A	8/18/2020						
8/14/2020	P7	8/13/2020						
8/7/2020	P6	8/6/2020						
7/31/2020	P5	7/30/2020						
7/24/2020	P4	7/17/2020						
7/17/2020	P3	7/10/2020						
7/10/2020	P2A	7/3/2020						
7/3/2020	P2	6/26/2020						
6/26/2020	P1A	6/20/2020						
6/19/2020	P1	6/20/2020	FEC	1	\$0.00		\$0.00	\$0.00
6/10/2020	M5	6/8/2020						
5/11/2020	M4	5/10/2020						
4/10/2020	M3	4/10/2020						
3/10/2020	M2	3/10/2020						
2/10/2020	M1	2/10/2020						
1/10/2020	M12	1/9/2020						



**Florida Department of State
Division of Elections**

Floridians for Ethics, Accountability and Trust

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"/>	12/03/2019 - 12/31/2019	0.00	0.00	590.31	0.00	0.00	0.00
<input type="radio"/>	01/01/2020 - 01/31/2020	0.00	10.00	926.00	0.00	0.00	0.00
<input type="radio"/>	02/01/2020 - 02/29/2020	0.00	0.00	377.68	0.00	0.00	0.00
<input type="radio"/>	03/01/2020 - 03/31/2020	0.00	0.00	431.32	0.00	0.00	0.00
<input type="radio"/>	04/01/2020 - 04/30/2020	0.00	0.00	831.32	0.00	0.00	0.00
<input type="radio"/>	05/01/2020 - 05/31/2020	0.00	0.00	364.44	0.00	0.00	0.00
W	06/01/2020 - 06/12/2020	0.00	0.00	0.00	0.00	0.00	0.00
<input type="radio"/>	06/13/2020 - 06/19/2020	100.00	0.00	0.00	0.00	0.00	0.00
<input type="radio"/>	06/20/2020 - 06/26/2020	0.00	0.00	0.00	100.00	0.00	0.00
W	06/27/2020 - 07/03/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	07/04/2020 - 07/10/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	07/11/2020 - 07/17/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	07/18/2020 - 07/24/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	07/25/2020 - 07/31/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	08/01/2020 - 08/13/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	08/14/2020 - 08/14/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	08/15/2020 - 08/21/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	08/22/2020 - 08/28/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	08/29/2020 - 09/04/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	09/05/2020 - 09/11/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	09/12/2020 - 09/18/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	09/19/2020 - 09/25/2020	0.00	0.00	0.00	0.00	0.00	0.00

W	09/26/2020 - 10/02/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	10/03/2020 - 10/09/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	10/10/2020 - 10/16/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	10/17/2020 - 10/23/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	10/24/2020 - 10/24/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	10/25/2020 - 10/25/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	10/26/2020 - 10/26/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	10/27/2020 - 10/27/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	10/28/2020 - 10/28/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	10/17/2020 - 10/29/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	10/30/2020 - 10/31/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	11/01/2020 - 11/30/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	12/01/2020 - 12/31/2020	0.00	0.00	0.00	0.00	0.00	0.00
W	01/01/2021 - 01/31/2021	0.00	0.00	0.00	0.00	0.00	0.00
W	02/01/2021 - 02/28/2021	0.00	0.00	0.00	0.00	0.00	0.00
W	03/01/2021 - 03/31/2021	0.00	0.00	0.00	0.00	0.00	0.00
<input checked="" type="radio"/>	All Dates (Totals)	100.00	10.00	3,521.07	100.00	0.00	0.00

Note: (E) indicates that report was filed electronically

X Indicates that detail has not been released

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

Select Detail Type

Contributions ▼

Select Sort Order

Date(Ascending) ▼

Select Output Type

Display On Screen ▼

Submit Query Now

[Query the Campaign Finance Data Base](#)

[\[Department of State\]](#) [\[Division of Elections\]](#) [\[Candidates and Races\]](#) [\[Campaign Finance Information\]](#)

Floridians for Ethics, Accountability & Trust
PO BOX 702408
Saint Cloud, FL 34770

FILED-FL ELECTIONS COM
26 MAR '21 PM 3:34

March 12, 2021

Florida Elections Commission
107 West Gaines St, Suite 224
Tallahassee, FL 32399

RE: FEC 21-190 Floridians for Ethics, Accountability & Trust PAC
Number 74826

Dear Commission,

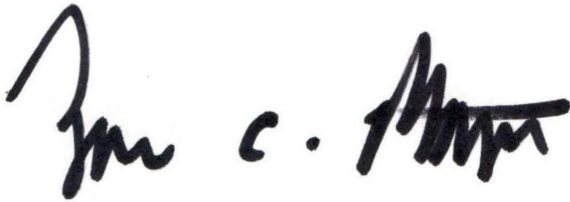
This letter is to serve as a response to the case mentioned above brought against me from the FEC. I failed to file these reports in a timely manner as I was unaware on reports P1, D2, D3, D4, D5 & D6 that the reporting dates were so close in time and needed to be filed so quickly in the system.

Due to the circumstances and fact there was no reported activity on any of these reports, I request that the Florida Elections Commission asses no fines or penalties in this matter.

I have since requested that the PAC be closed due to no further activity.

Thank You.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim C. Moore". The signature is written in a cursive, somewhat stylized font.

**FLORIDA ELECTIONS COMMISSION
PHONE LOG
Case No.: FEC 21-190**

Respondent: Floridians for Ethics, Accountability and Trust

Complainant: DOE

1. **Date and time:** March 30, 2022 @ 10:00
Name: Zane Matter—Respondent’s Chairman
Phone #: (863) 399-2967
Summary: I attempted telephone contact to complete final interview. I left a message to return my call.
Entered by: CKO
2. **Date and time:** April 1, 2022 @ 11:00 am
Name: Zane C. Matter—Respondent’s Chairman
Phone #: (863) 399-2967
Summary: I attempted telephone contact to complete final interview. I left a message to return my call.
Entered by: CKO
3. **Date and time:** April 3, 2022 @ 3:25 pm
Name: Zane C. Matter—Respondent’s Chairperson
Phone #: (863) 399-2967
Summary: I attempted telephone contact to complete final interview. I left another message to return my call.
Entered by: CKO
4. **Date and time:**
Name:
Phone #:
Summary:
Entered by:
5. **Date and time:**
Name:
Phone #:
Summary:
Entered by:
6. **Date and time:**
Name:
Phone #:
Summary:
Entered by:
7. **Date and time:**

Name:
Phone #:
Summary:
Entered by:

8. **Date and time:**

Name:
Phone #:
Summary:
Entered by:

9. **Date and time:**

Name:
Phone #:
Summary:
Entered by:

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

Type and ask your case specific question(s) first, then ask the remaining questions.

- Why were the 2020 P1, D2, D3, D4, D5, and D6 Reports untimely filed?
- Have you ever run for public office? If so, please name each office you ran for and state what year each election occurred.
- Have you ever been appointed to act as a campaign treasurer for a candidate? If so, please name each such candidate, the office each ran for, and state what year each election occurred.
- Have you ever held the office of chairperson, treasurer, or other similar position for a political committee or electioneering communications organization? If so, please name each committee, state the office you held for each, and state when you held each office.
- Have you ever prepared or signed a campaign treasurer's report? If so, please state the name of the candidate or committee whose report you prepared or signed.
- What action have you taken to determine your responsibilities under Florida's election laws?
- Do you possess a copy of Chapter 106, Florida Statutes? If so, when did you first obtain it? Have you read it?
- Do you possess a copy of the *Political Committee Handbook*? If so, when did you first obtain it? Have you read it?
- *If a section of Chapter 104 is listed in the LS letter, ask:* Do you possess a copy of Chapter 104, Florida Statutes? If so, when did you first obtain it? Have you read it?
- Did you receive any other materials from your filing officer? If so, please describe them.
- Do you have anything else to add for the Commission's consideration regarding the charges specified in the letter of legal sufficiency in this case?

**FLORIDA ELECTIONS COMMISSION
PHONE LOG
Case No.: FEC 21-190**

Respondent: Floridians for Ethics, Accountability and Trust

Complainant: DOE

1. **Date and time:** March 30, 2022 @ 10:00
Name: Zane Matter—Respondent’s Chairman
Phone #: (863) 399-2967
Summary: I attempted telephone contact to complete final interview. I left a message to return my call.
Entered by: CKO
2. **Date and time:** April 1, 2022 @ 11:00 am
Name: Zane C. Matter—Respondent’s Chairman
Phone #: (863) 399-2967
Summary: I attempted telephone contact to complete final interview. I left a message to return my call.
Entered by: CKO
3. **Date and time:** April 3, 2022 @ 3:25 pm
Name: Zane C. Matter—Respondent’s Chairperson
Phone #: (863) 399-2967
Summary: I attempted telephone contact to complete final interview. I left another message to return my call.
Entered by: CKO
4. **Date and time:**
Name:
Phone #:
Summary:
Entered by:
5. **Date and time:**
Name:
Phone #:
Summary:
Entered by:
6. **Date and time:**
Name:
Phone #:
Summary:
Entered by:
7. **Date and time:**

Name:
Phone #:
Summary:
Entered by:

8. **Date and time:**

Name:
Phone #:
Summary:
Entered by:

9. **Date and time:**

Name:
Phone #:
Summary:
Entered by:

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

Type and ask your case specific question(s) first, then ask the remaining questions.

- Why were the 2020 P1, D2, D3, D4, D5, and D6 Reports untimely filed?
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- Have you ever held the office of chairperson, treasurer, or other similar position for a political committee or electioneering communications organization? If so, please name each committee, state the office you held for each, and state when you held each office.
- Have you ever prepared or signed a campaign treasurer's report? If so, please state the name of the candidate or committee whose report you prepared or signed.
- What action have you taken to determine your responsibilities under Florida's election laws?
- Do you possess a copy of Chapter 106, Florida Statutes? If so, when did you first obtain it? Have you read it?
- Do you possess a copy of the *Political Committee Handbook*? If so, when did you first obtain it? Have you read it?
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- Did you receive any other materials from your filing officer? If so, please describe them.
- Do you have anything else to add for the Commission's consideration regarding the charges specified in the letter of legal sufficiency in this case?



Florida Elections Commission

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



March 31, 2021

Zane C. Matter, Chair
Floridians for Ethics, Accountability and Trust
PO Box 702408
Saint Cloud, FL 34770-2408

RE: Case No.: FEC 21-190; Respondent: Floridians for Ethics, Accountability and Trust

Dear Mr. Matter:

On March 5, 2021, the Florida Elections Commission received a complaint alleging your committee violated Florida's election laws. I have reviewed the complaint and find that it contains one or more **legally sufficient allegations**. The Commission staff will investigate the following alleged violation(s):

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

- 2020 P1
- 2020 D2
- 2020 D3
- 2020 D4
- 2020 D5
- 2020 D6

However, prior to an investigation, you have the option to **resolve your case now by** signing a minor violation consent order and **paying a fine of \$300**, per Rule 2B-1.003, Florida Administrative Code, **rather than the potential \$1,000 per violation** provided for in Section 106.265, Florida Statutes.

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

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

Floridians for Ethics, Accountability and Trust
March 31, 2021
Page 2
FEC 21-190

the Commission. You and the Complainant will receive notice at least 14 days before any hearing at which your case is to be considered.

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

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

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

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

Sincerely,

A handwritten signature in blue ink that reads "Tim Vaccaro". The signature is fluid and cursive, with the first name "Tim" being particularly prominent.

Tim Vaccaro
Executive Director

TV/med

Floridians for Ethics, Accountability & Trust
PO BOX 702408
Saint Cloud, FL 34770

March 12, 2021

Florida Elections Commission
107 West Gaines St, Suite 224
Tallahassee, FL 32399

RE: FEC 21-190 Floridians for Ethics, Accountability & Trust PAC
Number 74826

Dear Commission,

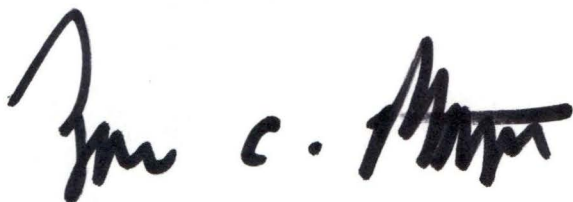
This letter is to serve as a response to the case mentioned above brought against me from the FEC. I failed to file these reports in a timely manner as I was unaware on reports P1, D2, D3, D4, D5 & D6 that the reporting dates were so close in time and needed to be filed so quickly in the system.

Due to the circumstances and fact there was no reported activity on any of these reports, I request that the Florida Elections Commission asses no fines or penalties in this matter.

I have since requested that the PAC be closed due to no further activity.

Thank You.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim C. Moore". The signature is written in a cursive, somewhat stylized font.

FILED-FL ELECTIONS COM
26 MAR '21 PM 3:34

Po Box 702408
Saint Cloud, FL 34770-2401

ORLANDO FL 328

13 MAR 2021 PM 4 L



RECEIVED

2021 MAR 26 P 2:33

STATE OF FLORIDA
ELECTIONS COMMISSION

Florida Elections Commission
107 West Gaines St, Suite 207
Tallahassee, FL 32301

32399-659674



**DIVISION OF ELECTIONS
FEC NOTICE FORM**

To FEC from Division of Elections

Name: Floridians for Ethics, Accountability and Trust
Account Number: 74826
Chairperson: Zane C. Matter
Treasurer: Zane C. Matter
Registered Agent: Zane C. Matter

The Division of Elections hereby provides this notice to the Florida Elections Commission pursuant to sections 106.07(8)(d), 106.22(7), and 106.25(2), Florida Statutes. An apparent violation of Chapter 106, Florida Statutes, has occurred based upon repeated late filings or failure to notify the filing officer in writing that no report was being filed on the prescribed reporting date as required by section 106.07(7), Florida Statutes, for the following reports:

2020 P1	2020 D2
2020 D3	2020 D4
2020 D5	2020 D6

- Floridians for Ethics, Accountability and Trust (74826) is a political committee registered with the Division of Elections. On December 13, 2019, the committee filed the DSDE 5 and DSDE 6 with the Division indicating that Zane Matter was the chairperson and the treasurer for the committee.
- The 2020 P1 campaign treasurer's report was due on June 19, 2020. Floridians for Ethics, Accountability and Trust failed to notify the Division that no report was being filed on the prescribed reporting date. On June 20, 2020, the committee filed a notification of no activity. (See attached file receipt and letter.)
- The 2020 D2 campaign treasurer's report was due on October 25, 2020. Floridians for Ethics, Accountability and Trust failed to notify the Division that no report was being filed on the prescribed reporting date. On October 30, 2020, the committee filed a notification of no activity. (See attached file receipt.)

- The 2020 D3 campaign treasurer's report was due on October 26, 2020. Floridians for Ethics, Accountability and Trust failed to notify the Division that no report was being filed on the prescribed reporting date. On October 30, 2020, the committee filed a notification of no activity. (See attached file receipt.)
- The 2020 D4 campaign treasurer's report was due on October 27, 2020. Floridians for Ethics, Accountability and Trust failed to notify the Division that no report was being filed on the prescribed reporting date. On October 30, 2020, the committee filed a notification of no activity. (See attached file receipt.)
- The 2020 D5 campaign treasurer's report was due on October 28, 2020. Floridians for Ethics, Accountability and Trust failed to notify the Division that no report was being filed on the prescribed reporting date. On October 30, 2020, the committee filed a notification of no activity. (See attached file receipt.)
- The 2020 D6 campaign treasurer's report was due on October 29, 2020. Floridians for Ethics, Accountability and Trust failed to notify the Division that no report was being filed on the prescribed reporting date. On October 30, 2020, the committee filed a notification of no activity. (See attached file receipt.)

Sent By: Kristi Reid Willis
Date: March 3, 2021
dlh

KRW

 **Treasurer Report Status**

ID: **74826** Name: **Floridians for Ethics, Accountability and Trust**

Report: 2020 - P1 - 7

Print Date: **3/3/2021 10:48:30 AM**

Election: 2020 General Election

Covers: 6/1/2020-6/12/2020

Amended Waiver

Due: 6/19/2020

Filed: **6/20/2020 9:18:23 AM**

File Status: **Filed Report**

Reviewed: **6/20/2020**

Review Status: **Reviewed**

Detail Complete: **No Detail Records Found**

File Method: Web Filed

Number of Detail Records

Entry Method: Web Data Entry

Contributions: 0

Expenditures: 0

Pending Queued Items: **0**

Fund Transfers: 0

Distributions: 0

To Print Report: Right Click Mouse and Select 'Print'



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

June 22, 2020

Zane C. Matter, Treasurer
Floridians for Ethics, Accountability and Trust
Post Office Box 702408
Saint Cloud, FL 34770-4770

PAC 74826

Dear Mr. Matter:

The notification that you had no reportable activity for the report deadline of June 19, 2020, was not filed until June 20, 2020. Although the notification is late, no automatic fine is assessed because you had no receipts or expenditures during this reporting period.

However, to avoid potential issues in the future, please note that state law (s. 106.07(7), Fla. Stat.) requires you to file by the dates set out also in law, either a campaign finance report or if applicable, a notification that no reportable activity occurred for the reporting period. Failure to do may constitute a violation of sections 106.07(1) and 106.19(1)(c), Fla. Stat. The Division is required to notify the Florida Elections Commission of any apparent violation of chapter 106, Fla. Stat., or any failure to file a report or information required by chapter 106, Fla. Stat. If a matter is referred to the Florida Elections Commission, the Commission may assess a civil penalty of up to \$1,000 per violation.

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

Sincerely,

Kristi Reid Willis, Chief
Bureau of Election Records

cc: Zane C. Matter, Chairperson

 **Treasurer Report Status**

ID: **74826** Name: **Floridians for Ethics, Accountability and Trust**

Report: 2020 - D2 - 28

Print Date: **3/3/2021 10:49:18 AM**

Election: 2020 General Election

Covers: 10/24/2020-10/24/2020

Amended Waiver

Due: 10/25/2020

Filed: **10/30/2020 11:30:29 AM**

File Status: **Filed Report**

Reviewed: **10/29/2020**

Review Status: **Reviewed**

Detail Complete: **No Detail Records Found**

File Method: Web Filed

Number of Detail Records

Entry Method: Web Data Entry

Contributions: 0

Expenditures: 0

Pending Queued Items: **0**

Fund Transfers: 0

Distributions: 0

To Print Report: Right Click Mouse and Select 'Print'

 **Treasurer Report Status**

ID: **74826** Name: **Floridians for Ethics, Accountability and Trust**

Report: 2020 - D3 - 29

Print Date: **3/3/2021 10:49:45 AM**

Election: 2020 General Election

Covers: 10/25/2020-10/25/2020

Amended Waiver

Due: 10/26/2020

Filed: **10/30/2020 11:30:42 AM**

File Status: **Filed Report**

Reviewed: **10/30/2020**

Review Status: **Reviewed**

Detail Complete: **No Detail Records Found**

File Method: Web Filed

Number of Detail Records

Entry Method: Web Data Entry

Contributions: 0

Expenditures: 0

Pending Queued Items: **0**

Fund Transfers: 0

Distributions: 0

To Print Report: Right Click Mouse and Select 'Print'

 **Treasurer Report Status**

ID: **74826** Name: **Floridians for Ethics, Accountability and Trust**

Report: 2020 - D4 - 30

Print Date: **3/3/2021 10:50:13 AM**

Election: 2020 General Election

Covers: 10/26/2020-10/26/2020

Amended Waiver

Due: 10/27/2020

Filed: **10/30/2020 11:30:58 AM**

File Status: **Filed Report**

Reviewed: **10/30/2020**

Review Status: **Reviewed**

Detail Complete: **No Detail Records Found**

File Method: Web Filed

Number of Detail Records

Entry Method: Web Data Entry

Contributions: 0

Expenditures: 0

Pending Queued Items: **0**

Fund Transfers: 0

Distributions: 0

To Print Report: Right Click Mouse and Select 'Print'

 **Treasurer Report Status**

ID: **74826** Name: **Floridians for Ethics, Accountability and Trust**

Report: 2020 - D5 - 31

Print Date: **3/3/2021 10:50:40 AM**

Election: 2020 General Election

Covers: 10/27/2020-10/27/2020

Amended Waiver

Due: 10/28/2020

Filed: **10/30/2020 11:31:12 AM**

File Status: **Filed Report**

Reviewed: **10/30/2020**

Review Status: **Reviewed**

Detail Complete: **No Detail Records Found**

File Method: Web Filed

Number of Detail Records

Entry Method: Web Data Entry

Contributions: 0

Expenditures: 0

Pending Queued Items: **0**

Fund Transfers: 0

Distributions: 0

To Print Report: Right Click Mouse and Select 'Print'

 **Treasurer Report Status**

ID: **74826** Name: **Floridians for Ethics, Accountability and Trust**

Report: 2020 - D6 - 32

Print Date: **3/3/2021 10:51:04 AM**

Election: 2020 General Election

Covers: 10/28/2020-10/28/2020

Amended Waiver

Due: 10/29/2020

Filed: **10/30/2020 11:31:26 AM**

File Status: **Filed Report**

Reviewed: **10/30/2020**

Review Status: **Reviewed**

Detail Complete: **No Detail Records Found**

File Method: Web Filed

Number of Detail Records

Entry Method: Web Data Entry

Contributions: 0

Expenditures: 0

Pending Queued Items: **0**

Fund Transfers: 0

Distributions: 0

To Print Report: Right Click Mouse and Select 'Print'