

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**In Re: Robert Prater**

**Case No.: FEC 18-052**

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

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

**NOTICE OF VIRTUAL HEARING (CONSENT ORDER: PUBLIC)**

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](mailto:FEC@myfloridalegal.com) · [www.fec.state.fl.us](http://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](http://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,**

v.

**Agency Case No.: FEC 18-052  
F.O. No.: FOFEC <#>**

**Robert Prater,  
Respondent.**

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**CONSENT FINAL ORDER**

Respondent, Robert Prater, and the Florida Elections Commission (Commission) agree that this Consent Order resolves all of the issues between the parties in this case. The parties jointly stipulate to the following facts, conclusions of law, and order.

**FINDINGS OF FACT**

1. On February 20, 2018, a complaint was filed with the Commission alleging that Respondent violated Florida's election laws.
2. On December 9, 2019, the Commission entered an Order of Probable Cause finding there was probable cause to charge the Respondent with one count of violating Section 106.143(1)(a), Florida Statutes.
3. Respondent has expressed a desire to enter into negotiations directed toward reaching a consent agreement.
4. Respondent and staff stipulate to the following facts:
  - a. Respondent was a 2018 candidate for Chair of the Orange County School Board.

b. Respondent disputed a material issue of fact and this matter was referred to the Division of Administrative Hearings.

### **CONCLUSIONS OF LAW**

5. The Commission has jurisdiction over the parties to and subject matter of this cause, pursuant to Section 106.26, Florida Statutes.

6. Respondent neither admits nor denies that he violated the Florida Election Code.

### **ORDER**

7. The Respondent and the staff of the Commission have entered into this Consent Order freely and voluntarily.

8. The Respondent shall bear his own attorney's fees and costs that are in any way associated with this case.

9. The Commission will consider this Consent Order at its next available meeting.

10. Respondent voluntarily waives the right to any further proceedings under Chapters 104, 106, and 120, Florida Statutes, and the right to appeal this Consent Order.

11. This Consent Order is enforceable under Sections 106.265 and 120.69, Florida Statutes. Respondent expressly waives any venue privileges and agrees that if enforcement of this Consent Order is necessary, venue shall be in Leon County, Florida, and Respondent shall pay all fees and costs associated with enforcement.

12. Payment of the civil penalty by cashier's check, or money order, good for at least 120 days, or attorney trust account check, is a condition precedent to the Commission's consideration of this Consent Order.

### **PENALTY**

**WHEREFORE**, based upon the foregoing facts and conclusions of law, the Commission

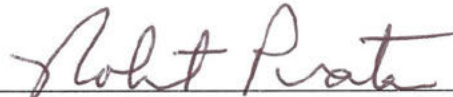
finds that the Respondent violated Section 106.143(1)(a), Florida Statutes, and imposes a civil penalty in the amount of \$125.

Therefore, it is

**ORDERED** that the Respondent shall remit to the Commission a civil penalty in the amount of **\$125**, inclusive of fees and costs. The civil penalty shall be paid cashier's check or money order, good for at least 120 days, or attorney trust account check. The civil penalty shall be payable to the Florida Elections Commission and sent to 107 West Gaines Street, Collins Building, Suite 224, Tallahassee, Florida, 32399-1050.

**Respondent** hereby agrees and consents to the terms of this Consent Order on

\_\_\_\_\_.



Robert Prater  
9118 Palos Verdes Drive  
Orlando, FL 32825

**THIS SPACE INTENTIONALLY LEFT BLANK**

Commission staff hereby agrees and consents to the terms of this Consent Order on

November 30, 2020.



Stephanie J. Cunningham  
Assistant General Counsel  
Florida Elections Commission  
107 West Gaines Street  
The Collins Building, Suite 224  
Tallahassee, FL 32399-1050

Approved by the Florida Elections Commission at its regularly scheduled meeting held  
on \_\_\_\_\_, in Tallahassee, Florida.

\_\_\_\_\_  
Joni Alexis Poitier, Vice Chair  
Florida Elections Commission

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

PRINTED ON LINEMARK PAPER - HOLD TO LIGHT TO VIEW. FOR ADDITIONAL SECURITY FEATURES SEE BACK.

**CASHIER'S CHECK**

**6625802675**

0066258 11-24  
Office AU# 1210(8)  
Remitter: **ROBERT PRATER**  
Operator I.D.: **u635682 u635682**

**November 10, 2020**

PAY TO THE ORDER OF **\*\*\*FLORIDA ELECTIONS COMMISSION\*\*\***

**\*\*One Hundred Twenty-Five and 00/100 -US Dollars \*\***

**\*\*\$125.00\*\***

Payee Address:  
Memo:

VOID IF OVER US \$ 125.00

WELLS FARGO BANK, N.A.  
8120 LAKE UNDERHILL RD  
ORLANDO, FL 32825  
FOR INQUIRIES CALL (480) 394-3122

*Murva S. Can*  
CONTROLLER

Details on Back. Security Features Included.





Robert Prater  
9118 Palos Verde Dr.  
Orlando, FL 32825

*[Handwritten signature]*

*[Handwritten initials]*

RECEIVED  
2020 NOV 30 A 8:30  
STATE OF FLORIDA  
ELECTIONS COMMISSION

Florida Elections Commission  
107 West Gaines St.  
Collins Blvd, Ste # 224  
Tallahassee, FL 32399  
92399-659674



STATE OF FLORIDA  
DIVISION OF ADMINISTRATIVE HEARINGS

FLORIDA ELECTIONS COMMISSION,

Petitioner,

vs.

Case No. 20-4744FEC

ROBERT PRATER,

Respondent.

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ORDER CLOSING FILE

This cause comes before the undersigned on the Joint Motion to Relinquish Jurisdiction filed on November 6, 2020. The parties have reached a settlement, and request that the matter be relinquished to the Florida Elections Commission to take action on the settlement. The undersigned being fully advised, it is, therefore,

ORDERED that:

1. The Joint Motion is GRANTED.
2. The pre-hearing conference scheduled for December 4, 2020, and the final hearing scheduled December 10, 2020, are canceled.
3. The file of the Division of Administrative Hearings is closed and jurisdiction is relinquished to the State of Florida, Commission on Ethics.

D O N E   N D   O R D E R E D   t h i s   6 t h   d a y   o f   N o v e m b e r ,   2 0 2 0 ,   i n   T a l l a h a s s e e ,   L e o n  
C o u n t y ,   F l o r i d a .

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H E T   L D E S   I

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( 8 5 0 )   4 8 8 - 9 6 7 5  
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D i v i s i o n   o f   a d m i n i s t r a t i v e   H e a r i n g s  
t h i s   6 t h   d a y   o f   N o v e m b e r ,   2 0 2 0 .

C O P I E S   F U R N I S H E D :

S t e p h a n i e   J a n e   C u n n i n g h a m ,   E s q u i r e  
F l o r i d a   E l e c t i o n s   C o m m i s s i o n  
C o l l i n s   B u i l d i n g ,   S u i t e   2 2 4  
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STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION

Florida Elections Commission,  
Petitioner,

Case No.: FEC 18-052

v.

Robert Prater,  
Respondent.

ORDER REFERRING CASE TO THE DIVISION OF ADMINISTRATIVE HEARINGS

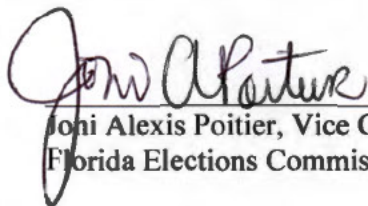
THIS MATTER was heard by the Florida Elections Commission (Commission) at its regularly scheduled meeting on August 26, 2020, in Tallahassee, Florida.

During the informal hearing, Respondent disputed an issue of material fact. Thereupon, counsel for the Commission terminated the hearing, pursuant to Section 120.569(1), Florida Statutes.

It is therefore **ORDERED** and **ADJUDGED** as follows:

The Commission Clerk shall transmit this matter to the Division of Administrative Hearings.

**DONE AND ORDERED** by the Florida Elections Commission on August 26, 2020.

  
\_\_\_\_\_  
Joni Alexis Poitier, Vice Chair  
Florida Elections Commission

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

FILED

19 DEC -9 AM 10:43

STATE OF FLORIDA  
ELECTIONS COMMISSION

**STATE OF FLORIDA  
FLORIDA ELECTIONS COMMISSION**

**Florida Elections Commission,  
Petitioner,**

**Case No.: FEC 18-052**

v.

**Robert Prater,  
Respondent.**

**ORDER OF PROBABLE CAUSE**

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


On September 6, 2019, Staff recommended to the Commission that there was probable cause to believe that the Florida Election Code was violated. The facts articulated in Staff's Recommendation are adopted by reference and incorporated herein. Based on the Complaint, Report of Investigation, Staff's Recommendation, and oral statements (if any) made at the probable cause hearing, the Commission finds that there is **probable cause** to charge Respondent with the following violation(s):

**THIS SPACE INTENTIONALLY LEFT BLANK**

**Count 1:**

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

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

  
\_\_\_\_\_  
Joni Alexis Poitier, Vice Chair  
Florida Elections Commission

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

**NOTICE OF RIGHT TO A HEARING**

As the Respondent, you may elect to resolve this case in several ways. First, you may elect to resolve this case by 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: Robert Prater**

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**Case No.: FEC 18-052**

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

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

**NOTICE OF HEARING (PROBABLE CAUSE DETERMINATION)**

A hearing will be held in this case before the Florida Elections Commission on, **November 19, 2019 at 9:00 am, or as soon thereafter as the parties can be heard**, at the following location: **Senate Office Building, 404 South Monroe Street, Room 110-S, Tallahassee, Florida 32399**. Due to heightened security access requirements, please bring only essential items into the building and plan to arrive early to allow for delays coming through security.

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

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

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

**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 1, 2019



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

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

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: Robert Prater**

**Case No.: FEC 18-052**

**STAFF RECOMMENDATION FOLLOWING INVESTIGATION**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

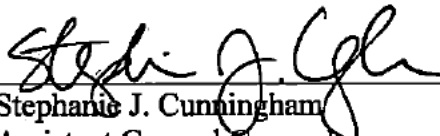
12. The facts set forth above show that Respondent was a 2018 candidate for Chair of the Orange County School Board. Respondent paid for and published a political advertisement that did not include the required statutory disclaimer.

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


**Count 1:**

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

Respectfully submitted on September 6, 2019.

  
\_\_\_\_\_  
Stephanie J. Cunningham  
Assistant General Counsel

I reviewed this Staff Recommendation this 6<sup>th</sup> day of September 2019.

  
\_\_\_\_\_  
Tim Vaccaro  
Executive Director

## **Stephanie Cunningham**

---

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

Dear Ms. Cunningham:

Re: Case No: FEC 18-052

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

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

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

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

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

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

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

Here is the type of data I would use in my campaign

[http://www.nea.org/assets/docs/2017\\_Rankings\\_and\\_Estimates\\_Report-FINAL-SECURED.pdf](http://www.nea.org/assets/docs/2017_Rankings_and_Estimates_Report-FINAL-SECURED.pdf)

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

Rankings And Estimates Report final 2017 Title & TOC

www.nea.org

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

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

**Please dismiss Case No: FEC 18-052**

**Robert Prater**

The information contained in this e-mail message is intended solely for the recipient(s) and may contain privileged information. Tampering with or altering the contents of this message is prohibited. This information is the same as any written document and may be subject to all rules governing public information according to Florida Statutes. Any message that falls under Chapter 119 shall not be altered in a manner that misrepresents the activities of Orange County Public Schools.

[References: Florida State Constitution I.24, Florida State Statutes Chapter 119, and OCPS Management Directive A-9.] If you have received this message in error, or are not the named recipient notify the sender and delete this message from your computer.

## Stephanie Cunningham

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

**Respondent:** Robert Prater

**Complainant:** Claramargaret H. Groover

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

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

**I. Preliminary Information:**

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

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

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

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

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

associated with the Federal Tax Identification Number listed in the notice, nor could she find any entity doing business as "The Campaign to Elect Robert A Prater". Due to this, she alleges that it is unclear who is actually paying for the advertisement. She does note in her complaint that the footer on each page of the website states, "Political advertisement paid for and approved by the candidate." To review a copy of the complaint, refer to Exhibit 2.

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

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

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

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

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

11. In a telephone interview on May 20, 2019, Respondent stated that he and his wife had used Nancy Robinson, another candidate for Orange County School Board's website as a template when creating his campaign site. He does not know where the non-profit language came from, as it was not in the example website that they used as the template. The best that he could

figure was that his site may have been hacked, or there was a malfunction with the Donorbox link. He stated that he was always careful with making sure the proper disclaimer was on all his advertising, and that there was a disclaimer on his website, found under this name at the top of the home page, and at the bottom of his website. The miscellaneous 501(c)(3) language was attached to the Donorbox link only. To review a copy of the investigative telephone log, refer to Exhibit 6.

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

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

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

### **III. FEC History:**

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

### **Conclusion:**

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

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

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

Respectfully submitted on June 4, 2019.



---

Samantha Spore  
Investigation Specialist

**Current address of Respondent**

Mr. Robert Prater  
9118 Palos Verdes Drive  
Orlando, FL 32825

**Current address of Complainant**

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

**Name and Address of Filing Officer:**

The Honorable Bill Cowles  
Supervisor of Elections  
119 West Kaley Street  
Orlando, FL 32856

Copy furnished to: Mr. David Flagg, Investigations Manager

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

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



### Campaign to Elect Robert Prater

← Choose amount →

- 25
- 50
- 100
- 250
- 500
- 1000

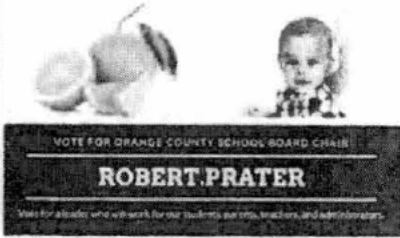
Write us a comment

Next →

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

We are a 501(c)(3) non-profit organization. The campaign to Elect Robert A. Prater, ETS # 82-3880419, All contributions are non-tax deductible. No goods or services will be provided in exchange for this contribution.

①



Page 3 of website.  
www.voterobprater.com

# Campaign to Elect Robert Prater

- \$ 10
- \$ 25
- \$ 50
- \$ 100
- \$ 250
- \$ 1000  
maximum donation
- \$  
Type custom amount

Write us a comment

Next

Powered by DonorBox

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

Page 3 of 10

• **Orange County is falling behind in education**

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

• **We have a severe shortage of highly qualified teachers**

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

• **Orange County ESE Programs**

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

• **Our schools continuous Safety Improvements**

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

EXHIBIT 1 page 3 of 10



years.

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

Page 3 of  
website

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

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

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

Facebook · LinkedIn · Twitter

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

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

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

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

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

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

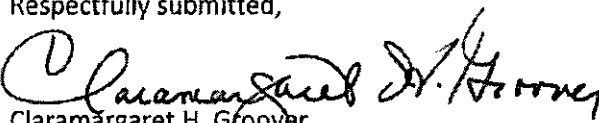
A copy of the screen shot is included with the Complaint and this Narrative as Exhibit "1." First, I have been unable to locate any entity authorized to do business either as a properly formed Florida corporation, a limited liability company, or an entity doing business as "The Campaign to Elect Robert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

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

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

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

Respectfully submitted,

  
Claramargaret H. Groover

Angela



Louisville Mayor 2018

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

DONATE (/DONATE)

## DONATE TO THE ANGELA LEET FOR MAYOR CAMPAIGN

YOUR CONTRIBUTION IS APPRECIATED!

Choose amount     →

\$ 25	\$ 50	\$ 100
\$ 1,000	\$ 2,000	

\$

Next →

Powered by Donorbox ([https://donorbox.org/?utm\\_source=Poweredby](https://donorbox.org/?utm_source=Poweredby))

Prefer to pay by check?

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

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

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

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

LATEST TWEETS

CONTACT

EXHIBIT

3

MAILING ADDRESS:



### LFSC Annual Giving Campaign 2019

Choose amount

- \$1,500  
Heroes Club
- \$1,000  
Green and Yellow Club
- \$500  
Gold Medal Club
- \$250  
Silver Medal Club
- \$100  
Bronze Medal Club
- \$50  
LFSC Fan Club
- \$ \_\_\_\_\_  
Enter custom amount

Designation  
Area of greatest need

Write us a comment

\$500                      1                      \$15,000  
Raised                      Donation                      Goal  
Annual Fund

[Facebook](#) [LinkedIn](#) [Twitter](#)

The Lake Forest Swim Club is a 501(c)3 charitable organization, EIN 36-3396035. Donations to the club are tax deductible under current tax codes, absent any limitations on deductibility applicable to a particular taxpayer. Gifts must be received by December 31st to be eligible for a 2019 tax deduction.

Campaign to Elect Robert Prater  
For Orange County School Board Chair

9118 Palos Verde Drive

Orlando, FL. 32825

[voterobprater@gmail.com](mailto:voterobprater@gmail.com)

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

To Ms. Erin Riley

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

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

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

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

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

Sincerely,

Robert Prater

EXHIBIT 5

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

**Respondent:** Robert Prater

**Complainant:** Claramargaret H. Groover

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

**Name:** Respondent

**Phone #:** 407-283-9142

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

**Memo to File?** No

**Entered by:** S. Spore

2. **Date and time:** 06/03/19- 4:27 PM

**Name:** Respondent

**Phone #:** 407-283-9142

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

**Memo to File?** No

**Entered by:** S. Spore

3. **Date and time:**

**Name:**

EXHIBIT 6 page 1 of 3

**Phone #:**  
**Summary:**  
**Memo to File? No**  
**Entered by:**

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

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

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

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

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

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

10. **Date and time:**

EXHIBIT 6 page 2 of 3

**Name:**  
**Phone #:**  
**Summary:**  
**Memo to File?** No  
**Entered by:**



**ROBERT PRATER**

FOR

ORANGE COUNTY SCHOOL  
BOARD CHAIR

**Elect an Educator as your School Board Chair.**

Paid for and approved by Campaign to Elect Robert Prater.

EXHIBIT 7 page 1 of 3

**ROBERT PRATER**

FOR

ORANGE COUNTY SCHOOL  
BOARD CHAIR



**Elect an Educator as your School Board Chair.**

Paid for and approved by Campaign to Elect Robert Prater

EXHIBIT 7 page 2 of 3

# ROBERT PRATER

FOR

ORANGE COUNTY SCHOOL  
BOARD CHAIR

**Elect an Educator as your School Board Chair.**

## About the Candidate

Paid for and approved by Campaign to Elect Robert Prater.



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

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

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

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

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

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

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

**AFFIDAVIT OF FILING OFFICER**

Case Number: **FEC 18-052**

**BILL COWLES**  
SUPERVISOR OF ELECTIONS  
ORANGE COUNTY, FL

**STATE OF FLORIDA**

**County of Orange**

*Cindy Clark*

**Bill Cowles, being duly sworn, says:**

2019 MAR 22 A 9:35

1. This affidavit is made upon my personal knowledge.
2. I am of legal age and competent to testify to the matters stated herein. I am currently employed by Supervisor of Elections as Director of Elections  
Orange Co., FL
3. Please provide copies of the listed items from the following candidate's campaign file:  
**Robert Prater.**

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

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

Check	ITEM	DATE
	<b>Chapter 106, Florida Statutes</b>	
	<b>Candidate and Campaign Treasurer Handbook</b> Please indicate <u>Year</u> .	
	<b>Other:</b> <sup>1</sup>	

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

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

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

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

Candidate did NOT attend, see sign-in sheets attached.

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

\_\_\_\_\_

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

\_\_\_\_\_

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

\_\_\_\_\_

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

*[Handwritten Signature]*

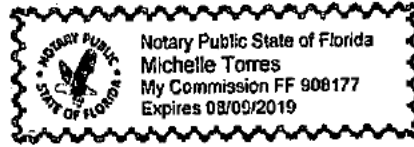
Signature of Affiant

Sworn to (or affirmed) and subscribed before me this 26<sup>th</sup> day of March, 2019.

*[Handwritten Signature]*

Signature of Notary Public - State of Florida

Print, Type, or Stamp Commissioned Name of Notary Public



Personally Known  or Produced Identification

Type of Identification Produced: \_\_\_\_\_

Case investigator: S. Spore

2019 MAR 26 PM 03:00  
2019 MAR 26 PM 03:00  
2019 MAR 26 PM 03:00

**STATEMENT OF  
CANDIDATE**

(Section 106.023, F.S.)

(Please print or type)

OFFICE USE ONLY

2017 DEC 27 P 4:21

I, Robert Allen Prater,

candidate for the office of Orange School Board chair;

have been provided access to read and understand the requirements of

Chapter 106, Florida Statutes.

x Robert Prater  
Signature of Candidate

12/27/17  
Date

Each candidate must file a statement with the qualifying officer within 10 days after the Appointment of Campaign Treasurer and Designation of Campaign Depository is filed. Willful failure to file this form is a first degree misdemeanor and a civil violation of the Campaign Financing Act which may result in a fine of up to \$1,000, (ss. 106.19(1)(c), 106.265(1), Florida Statutes).

## **Samantha Spore**

---

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

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

Mr. Prater

---

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

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

Mr. Prater,

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

### ***Samantha Spore***

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

---

The information contained in this e-mail message is intended solely for the recipient(s) and may contain privileged information. Tampering with or altering the contents of this message is prohibited. This information is the same as any written document and may be subject to all rules governing public information according to Florida Statutes. Any message that falls under Chapter 119 shall not be altered in a manner that misrepresents the activities of Orange County Public Schools.

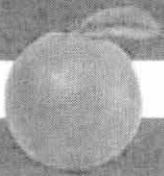
[References: Florida State Constitution I.24, Florida State Statutes Chapter 119, and OCPS Management Directive A-9.] If you have received this message in error, or are not the named recipient notify the sender and delete this message from your computer.



# ROBERT PRATER

FOR

ORANGE COUNTY SCHOOL  
BOARD CHAIR



**Elect an Educator as your School Board Chair.**

## About the Candidate

Paid for and approved by Campaign to Elect Robert Prater.



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

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

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

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

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

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

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

[www.Voterobprater.com](http://www.Voterobprater.com)

**ROBERT PRATER**

FOR

ORANGE COUNTY SCHOOL  
BOARD CHAIR



**Elect an Educator as your School Board Chair.**

Paid for and approved by Campaign to Elect Robert Prater.

**ROBERT PRATER**

FOR

ORANGE COUNTY SCHOOL  
BOARD CHAIR

**Elect an Educator as your School Board Chair.**

Paid for and approved by Campaign to Elect Robert Prater.



**FLORIDA ELECTIONS COMMISSION**

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

[www.fec.state.fl.us](http://www.fec.state.fl.us); [fec@myfloridalegal.com](mailto:fec@myfloridalegal.com)

December 18, 2018

Robert Prater  
9118 Palos Verdes Drive  
Orlando, FL 32825

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

Dear Mr. Prater:

On February 20, 2018, the Florida Elections Commission received a complaint alleging that you violated Florida's election laws. I have reviewed the complaint and find that it contains one or more legally sufficient allegations. The Commission staff will investigate the following alleged violation(s):

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

However, prior to an investigation, you have the option to resolve your case now by signing a minor violation consent order and paying a fine of \$250, per Rule 2B-1.003, Florida Administrative Code, rather than the potential \$1,000 per violation provided for in Section 106.265, Florida Statutes.

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

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

**Please contact Cole Kekelis at 850-922-4539, extension 106**, or at the address listed above, to accept this minor violation consent order offer.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Tim Vaccaro", with a long horizontal flourish extending to the right.

Tim Vaccaro  
Executive Director

TV/enr



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

1 Attachment



FEC Response to complaint .docx

Ms Riley,

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

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

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

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

Campaign to Elect Robert Prater  
Sent from [Mail](#) for Windows 10

**Campaign to Elect Robert Prater**  
**For Orange County School Board Chair**  
**9118 Palos Verde Drive**  
**Orlando, FL. 32825**  
**[voterobprater@gmail.com](mailto:voterobprater@gmail.com)**

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

**To Ms. Erin Riley**

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

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

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

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

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


**Sincerely,**

**Robert Prater**





Florida Department of State | DIVISION OF CORPORATIONS



Department of State / Division of Corporations / Search Records / Search by Entity Name

Next List Entity Name Search Search

**Entity Name List**

Corporate Name	Document Number	Status
<a href="#">TERESA JAMES JONES REALTY INC.</a>	P12000091476	INACT
<a href="#">TERESA JANNY FIGGOTT LLC</a>	L11000060746	Active
<a href="#">TERESA JARP LLC</a>	L15000146269	Active
<a href="#">TERESA J. DOUGHERT ACCOUNTING &amp; TAX SERVICE, INC.</a>	P01000017077	Active
<a href="#">TERESA JENNIFER THURBULO HEYT LLC</a>	L17000028941	Active
<a href="#">TERESA JONN REE</a>	H29008	INACT
<a href="#">TERESA JONES ECONOMY CONCRETE CO</a>	P98000091978	INACT
<a href="#">TERESA JOSEPH PA</a>	P07000011608	Active
<a href="#">TERESA J. PARKER PS</a>	P04000080198	Active
<a href="#">TERESA J. PRIVITERA INC.</a>	P15000018750	INACT
<a href="#">TERESA J. PULLARA, M.D., P.A.</a>	M69940	INACT
<a href="#">TERESA J. SOPP, P.A.</a>	P99000009907	Active
<a href="#">TERESA J. URBDA, P.A.</a>	P12000085066	Active

Free Donate Button - Donorbox

https://donorbox.org/edit/info

- Localization
- Receipt Email Settings
- Company Matching
- API & Zapier Integration
- MailChimp Integration
- Salesforce Integration
- Team
- Fraud Prevention
- Year-end Donor Receipt

Tax ID / EIN / ABN

Country of Headquarter  
United States

Address

City

Postal Code

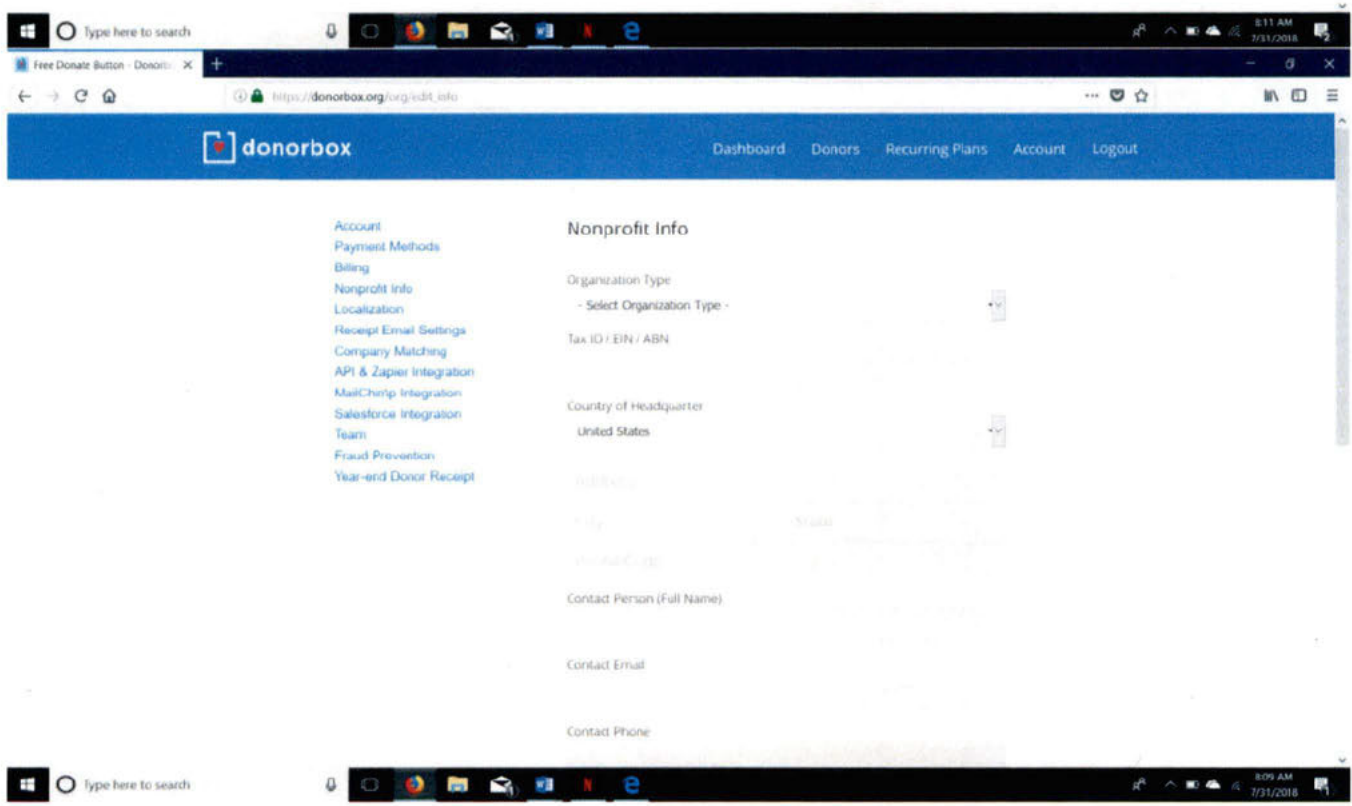
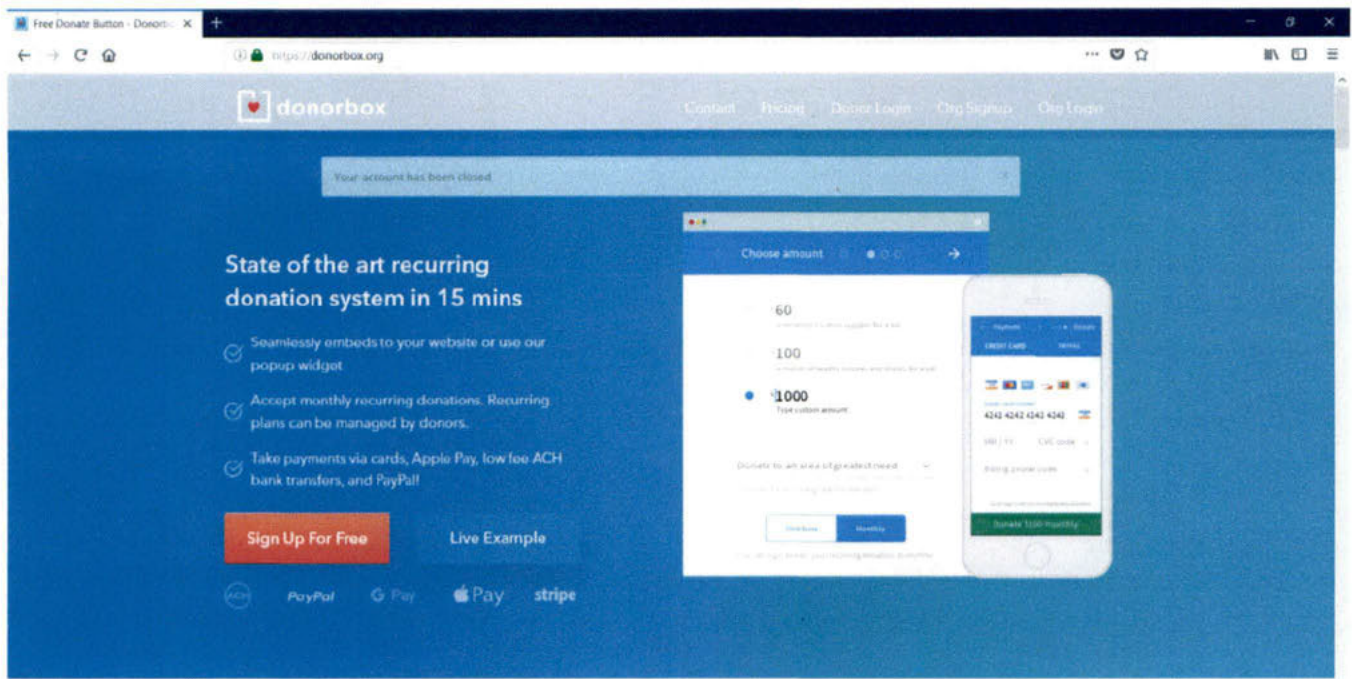
Contact Person (Full Name)

Contact Email

Contact Phone

Description of Organization or Fundraiser

Update Account



The screenshot shows the 'Online Candidate' administration interface. At the top, there is a navigation menu with links for Home, Site Setup, Page Management, E-Mail, Tools & Widgets, Generate Site, Marketing, and Support. The main heading is 'Edit Page'. Below this, there are several form fields for configuring a page:

- Navigation Name:**
- Page Title:**
- Page Description:**
- Keywords:**
- Alternate URL:**
- New Window:**
- No Sidebar:**
- Page File Name:**
- Navigation Type:**  Menu Page  Submenu Page

There are two 'Tell me more' buttons on the right side of the form.

The screenshot shows a configuration page for a donation form. It features five questions, each with a 'Required?' checkbox:

- Question 1:  Required?
- Question 2:  Required?
- Question 3:  Required?
- Question 4:  Required?
- Question 5:  Required?

Below the questions is a 'Donation Form Disclaimer' section with the following text:

**Donation Form Disclaimer:**  
Contributions are not deductible as charitable contributions for federal or state income tax purposes. Contributions are subject to federal and state contribution limits. Contributions from corporations and foreign nationals are prohibited.

Below the disclaimer is a 'Donation Form Thank You Message' section with a rich text editor. The message text is:

Thank you for your generous donation. Your commitment to helping my campaign is sincerely appreciated. With the help from supporters like you we will win this election!

At the bottom right of the form area, there is a 'Leave a message' button.

Campaign to Elect Robert Prater  
Sent from [Mail](#) for Windows 10

Campaign to Elect Robert Prater  
For Orange County School Board Chair

9118 Palos Verde Drive

Orlando, FL. 32825

[voterobprater@gmail.com](mailto:voterobprater@gmail.com)

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

To Ms. Erin Riley

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

Sincerely,

Robert Prater

REC'D: FL ELECTIONS COM  
20 FEB 18 PM 3:52

### COMPLAINT

The Commission's records and proceedings in a case are confidential until the Commission rules on probable cause. A copy of the complaint will be provided to the person against whom it is brought.

**1. PERSON BRINGING COMPLAINT:**

Name: Claramargaret H Groover Work Phone: (407) 808-7656  
Address: 1124 Bryn Mawr Street Home Phone: ( ) na  
City: Orlando County: Orange State: FL Zip Code: 32804

**2. PERSON AGAINST WHOM COMPLAINT IS BROUGHT:**

If you intend to name more than one individual or entity, please file multiple complaints. A person can be an individual, political committee, political party, electioneering communication organization, club, corporation, partnership, company, association, or other type of organization.

Name of individual or entity: Robert Prater  
Address: 9118 Palos Verdes Drive Phone: (407) 283-9142  
City: Orlando County: Orange State: FL Zip Code: 32825  
If individual is a candidate, list the office or position sought: OCPS Board Chair

Have you filed this complaint with the State Attorney's Office? (check one)  Yes  No  
Are you alleging a violation of Section 104.271(2), F.S.? (check one)  Yes  No  
Are you alleging a violation of Section 104.2715, F.S.? (check one)  Yes  No

**3. ALLEGED VIOLATION(S):**

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

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

SEE REVERSE SIDE OF DOCUMENT FOR ADDITIONAL INFORMATION

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

**4. OATH:**

STATE OF FLORIDA  
COUNTY OF ORANGE

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

\_\_\_\_\_  
Original Signature of Person Bringing Complaint

Sworn to and subscribed before me this \_\_\_\_\_ day of  
\_\_\_\_\_, 20 \_\_\_\_\_

\_\_\_\_\_  
Signature of Officer Authorized to Administer Oaths or Notary Public

\_\_\_\_\_  
(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known \_\_\_\_\_ Or Produced Identification \_\_\_\_\_

Type of Identification Produced \_\_\_\_\_

**5. IMPROPERLY COMPLETED COMPLAINT FORMS MAY BE RETURNED:**

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

4. OATH:

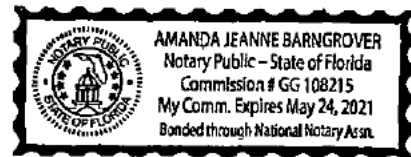
STATE OF FLORIDA  
COUNTY OF ORANGE

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

Amanda Jeanne Barngrover  
Original Signature of Person Bringing Complaint

Sworn to and subscribed before me this 16 day of  
February, 2018

[Signature]  
Signature of Officer Authorized to Administer Oaths or Notary Public



Amanda Barngrover  
{Print, Type, or Stamp Commissioned Name of Notary Public}

Personally Known \_\_\_\_\_ Or Produced Identification

Type of Identification Produced FL Drivers license

5. IMPROPERLY COMPLETED COMPLAINT FORMS MAY BE RETURNED:

- You **MUST submit this** completed complaint form in order to file a complaint.
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- **MAKE SURE** your complaint is **sworn** and there is **no defect** to the **notarization** in Section 4.

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

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

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

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

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

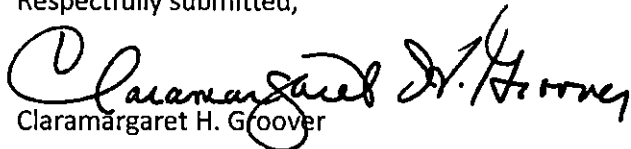
A copy of the screen shot is included with the Complaint and this Narrative as Exhibit "1." First, I have been unable to locate any entity authorized to do business either as a properly formed Florida corporation, a limited liability company, or an entity doing business as "The Campaign to Elect Robert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

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

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

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

Respectfully submitted,

  
Claramargaret H. Groover





## Campaign to Elect Robert Prater

← Choose amount ● ● ● ● →

- \$25
- \$50
- \$100
- \$250
- \$500
- \$1000  
maximum donation
- \$   
Type custom amount

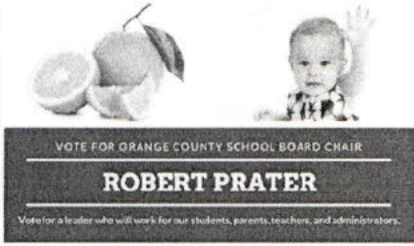
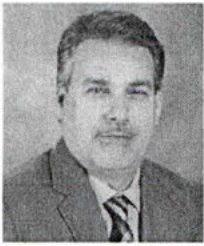
Write us a comment

Next →

Powered by Donorbox

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

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



Page 3 of website  
www.voterobprater.com

# Campaign to Elect Robert Prater

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

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- **Orange County is falling behind in education**

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

- **We have a severe shortage of highly qualified teachers**

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

- **Orange County ESE Programs**

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

- **Our schools continuous Safety Improvements**

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

years.

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

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website

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

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

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

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

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

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### Robert Prater Enters Race For Orange County School Board Chair ...

<orlando-politics.com/.../robert-prater-enters-race-orange-county-school-board-chair/> ▼

Jan 8, 2018 - Robert Prater, current dean and part of the leadership team at Oak Hill Elementary, committed to the students and the community, announced his run for Orange County School Board Chair. If elected, he will be the first teacher to sit as board chair since its inception in 2012. Mr. Prater's career began as a ...

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### Teacher Robert Prater files to run for Orange County School Board ...

<orlando-rising.com/teacher-robert-prater-files-run-orange-county-school-board-chair/> ▼

Jan 2, 2018 - Orange County teacher Robert Allen Prater has filed to run for the chair's position of the Orange County School Board. Prater, 54, of Orlando, is seeking to succeed School Board Chair Bill Sublette, who is running for Orange County mayor. In filing Dec. 27, Prater opens a contest for the chair's job with ...

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<voterobprater.com/> ▼

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

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<www.voterobprater.com/donate.html> ▼

... as the School Board Chair. We need to continue to spread the word across our School District. So please contribute to our campaign. All donations from \$25.00 up to \$1000 (max), is much appreciated. Please visit our PayPal account; Campaign to Elect Robert Prater at <https://www.paypal.com/paypalme/Voterobprater>.

### About | Campaign to Elect Robert Prater

<www.voterobprater.com/about.html> ▼

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

### Contact | Campaign to Elect Robert Prater

<voterobprater.com/contact.html> ▼

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

### Events and Fundraisers | Campaign to Elect Robert Prater

<voterobprater.com/events.html> ▼

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

### Campaign Kickoff to Elect Robert Prater, Orlando

<usa-eventer.com> › Cities › Orlando ▼

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

### County Candidates - Orange County Supervisor of Elections

[www.ocfelections.com/countycandidates\\_2018.aspx](www.ocfelections.com/countycandidates_2018.aspx) ▼

2/15/2018