

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Tea Time Political Association

Case No.: FEC 22-015

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

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

NOTICE OF HEARING (INFORMAL HEARING)

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

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

Audio participation:
1-877-309-2074

Attendee – muted:
966-952-589

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

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

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

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

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

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

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

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

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

See further instructions on the reverse side.

Tim Vaccaro

Executive Director
Florida Elections Commission
May 2, 2023

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

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

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

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

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

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

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

STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION

Florida Elections Commission,
Petitioner,

Case No.: FEC 22-015

v.

Tea Time Political Association,
Respondent.

_____ /

ORDER OF PROBABLE CAUSE

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

On October 4, 2022, Staff recommended to the Commission that there was probable cause to believe that the Florida Election Code was violated. The facts articulated in Staff’s Recommendation are adopted by reference and incorporated herein. Based on the Complaint, Report of Investigation, Staff’s Recommendation, and oral statements (if any) made at the probable cause hearing, the Commission finds that there is **probable cause** to charge Respondent with the following violations:

Count 1:

On or about October 12, 2021, Tea Time Political Association violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2021 M9 Report.

Count 2:

On or about November 10, 2021, Tea Time Political Association violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2021 M10 Report.

The Commission finds that there is **no probable cause** to charge Respondent with violating Section 106.19(1)(c), Florida Statutes.

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



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

Copies furnished to:
Mattie T. Clay, Assistant General Counsel
Tea Time Political Association, Respondent
Division of Elections, Complainant

NOTICE OF RIGHT TO A HEARING

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

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

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

If you do not elect to resolve the case by consent order or request a formal hearing at the DOAH or an informal hearing before the Commission within thirty (30) days of the date this Order of Probable Cause is filed with the Commission, the case will be sent to the Commission for a formal or informal hearing, depending on whether the facts are in dispute. The date this order was filed appears in the upper right-hand corner of the first page of the order.

To request a hearing, please send a written request to the Commission Clerk, Donna Ann Malphurs. The address of the Commission Clerk is 107 West Gaines Street, Collins Building, Suite 224, Tallahassee, Florida 32399-1050. The telephone number is (850) 922-4539. The Clerk will provide you with a copy of Chapter 28-106, *Florida Administrative Code*, and other applicable rules upon request. No mediation is available.

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Tea Time Political Association

Case No.: FEC 22-015

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

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

NOTICE OF HEARING (PROBABLE CAUSE DETERMINATION)

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

Meeting ID: 865 4284 2462
Passcode: 5UuWmT

AUDIO PARTICIPATION:

1-301-715-8592

Meeting ID: 865 4284 2462

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

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

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

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See further instructions on the reverse side.

Tim Vaccaro

Executive Director
Florida Elections Commission
January 9, 2023

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

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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: Tea Time Political Association

Case No.: FEC 22-015

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

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

NOTICE OF CANCELLATION OF HEARING
(PROBABLE CAUSE DETERMINATION)

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

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

Tim Vaccaro

Executive Director
Florida Elections Commission
December 13, 2022

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Tea Time Political Association

Case No.: FEC 22-015

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

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

NOTICE OF HEARING (PROBABLE CAUSE DETERMINATION)

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

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

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Tim Vaccaro

Executive Director
Florida Elections Commission
November 30, 2022

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

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

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

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: Tea Time Political Association

Case No.: FEC 22-015

STAFF RECOMMENDATION FOLLOWING INVESTIGATION

Pursuant to Section 106.25(4)(c), Florida Statutes, undersigned staff counsel files this written recommendation for disposition of the referral in this case recommending that there is **probable cause** to charge Respondent with violating **Section 106.07(7), Florida Statutes**, and that there is **no probable cause** to charge Respondent with violating **Section 106.19(1)(c), Florida Statutes**. Based upon a thorough review of the Report of Investigation submitted on September 9, 2022, the following facts and law support this staff recommendation:

1. On January 20, 2022, the Florida Elections Commission (“Commission”) received a referral from the Department of State, Division of Elections (“Division”), alleging that Tea Time Political Association (“Respondent”) violated Chapter 106, Florida Statutes.
2. Respondent is a political committee registered with the Division. (ROI Exhibit 2)¹
3. By letter dated April 5, 2022, the Executive Director notified Respondent that Commission staff would investigate the following statutory provisions:

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

- 2021 M9
- 2021 M10

Section 106.19(1)(c), Florida Statutes: As alleged in the complaint, Respondent, a political committee registered with the Division of Elections, may have falsely reported or deliberately failed to include information required by Chapter 106, Florida Statutes, during the following reporting periods:

- 2021 M9
- 2021 M10

4. By letter dated June 21, 2021, Donna S. Brown, Chief, Bureau of Election Records, sent Respondent a letter acknowledging that the Division had received its Statement of

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

Organization and Appointment of Campaign Treasurer and Designation of Campaign Depository for Political Committees forms. (ROI Exhibit 3, page 1)

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

6. Respondent’s 2021 M9 Report was due on October 12, 2021, and its 2021 M10 Report was due on November 10, 2021; however, Respondent failed to timely file the reports or notify the filing officer that no reports would be filed. *See* Compl. By letters dated October 13, 2021, November 1, 2021, November 12, 2021, November 22, 2021, and December 13, 2021, the Division notified Respondent that the reports had not been received. The letters also notified Respondent that it was still required to notify the Division if it had no reportable financial activity. (ROI Exhibits 4-6) The final notification letters were confirmed delivered on November 24, 2021, and December 15, 2021. (ROI Exhibit 5, page 2; ROI Exhibit 6, page 2)

7. A subpoena was issued to Respondent’s designated campaign depository to ascertain whether any financial activity occurred during the relevant reporting periods, i.e., September 1, 2021 – September 30, 2021, and October 1, 2021 – October 31, 2021. (ROI Exhibit 5, page 1; ROI Exhibit 6, page 1) The financial institution was unable to locate a campaign account in Respondent’s name. (ROI Exhibit 8, page 1; ROI, page 2, n. 1)

8. Respondent filed notices of no activity for the 2021 M9 and 2021 M10 reporting periods, which were 159 and 130 days late, respectively. (ROI Exhibit 7, page 1)

9. Karin Dennis, chairperson and treasurer for Respondent, stated the reports were filed late due to four deaths in her family since the middle of 2021. Ms. Dennis stated she had done her best to reconcile the problem. She stated that a bank account had not been opened for the committee, but she indicated it would be opened for the upcoming election cycle. She added that there had been no financial activity. Ms. Dennis stated she had not read the *Political Committee Handbook* or Chapter 106, Florida Statutes. (ROI Exhibit 9, pages 1-2)

10. As it appears that Respondent had no financial activity, Respondent was required to notify the filing officer in writing that it would not be filing its 2021 M9 and 2021 M10 Reports on the prescribed reporting dates but failed to do so. Thus, it does not appear that Respondent falsely reported or deliberately failed to include information in its 2021 M9 and 2021 M10 Reports as the reports were waived due to a lack of reportable financial activity.

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 is a political committee registered with the Division. Respondent failed to timely file its 2021 M9 and 2021 M10 Reports or notify the filing officer that no reports would be filed. It appears that Respondent had no financial activity during the relevant reporting periods and, therefore, was required to notify the filing officer in writing that it would not be filing its 2021 M9 and 2021 M10 Reports on the prescribed reporting dates but failed to do so. Thus, it does not appear that Respondent falsely reported or deliberately failed to include information in its 2021 M9 and 2021 M10 Reports as the reports were waived due to a lack of reportable financial activity.

Based upon these facts and circumstances, I recommend that the Commission find **no probable cause** to charge Respondent with violating **Section 106.19(1)(c), Florida Statutes**, and find **probable cause** to charge Respondent with violating the following:

Count 1:

On or about October 12, 2021, Tea Time Political Association violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2021 M9 Report.

Count 2:

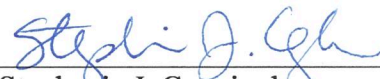
On or about November 10, 2021, Tea Time Political Association violated Section 106.07(7), Florida Statutes, when it failed to notify the filing officer in writing on the prescribed reporting date that it would not be filing its 2021 M10 Report.

Respectfully submitted on October 4, 2022.



Mattie T. Clay
Assistant General Counsel

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



Stephanie J. Cunningham
General Counsel

FLORIDA ELECTIONS COMMISSION

Report of Investigation for Sections 106.07(7) and 106.19(1)(c), F.S.

Case Number: FEC 22-015

Sections 106.07(7) and 106.19(1)(c), Florida Statutes, failure of a candidate or political committee that did not receive any contributions or make any expenditures during a reporting period to notify timely the filing officer, in writing, that no report is being filed or failure to file a campaign report to reflect financial activity.

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

Division of Elections (Division)

Referral Filed: January 20, 2022

Respondent Type: Political Committee

I. Preliminary Information:

1. Respondent is a political committee registered with the Division.

2. An Appointment of Campaign Treasurer and Designation of Campaign Depository (DS-DE 6) was filed on June 7, 2021. Karin Dennis was appointed as campaign treasurer. To review the DS-DE 6, refer to Exhibit 1.

3. A Statement of Organization (DS-DE 5) for the political committee was filed with the Division on June 17, 2021. To review the Statement of Organization, refer to Exhibit 2.

4. An acknowledgement letter was mailed to the address provided on the DS-DE 6 on June 21, 2021, advising the committee that all political committees filing reports with the Division are required to file by means of the Division's electronic filing system (EFS). The Respondent was provided with a user identification number and initial password allowing access to the EFS.

5. The acknowledgement letter also advised Respondent that all of the Division's publications and reporting forms are available on their website, including Chapter 106, Florida Statutes, the *Political Committee Handbook*, and the *Calendar of Reporting Dates*. The letter further advised that it was the committee's responsibility to read, understand, and follow the requirements of Florida's election laws. To review the acknowledgement letter, refer to Exhibit 3.

6. The Division sent correspondence to the address provided on the DS-DE 6 notifying Respondent that the following campaign reports, or the required notification that no reportable activity occurred, had not been filed: 2021 M9 and 2021 M10. The letters included reference to the filing dates for the reports. To review the failure to file correspondence, refer to Exhibit 4.

7. On November 22, 2021, the Division sent a letter marked "Final Notice" with delivery confirmation to the address provided on the DS-DE 6 notifying Respondent that the following campaign report, or the required notification that no reportable activity occurred, had not been filed: 2021 M9. The letter was confirmed delivered on November 24, 2021. To review the letter marked "Final Notice" and delivery confirmation, refer to Exhibit 5.

8. On December 13, 2021, the Division sent a letter marked "Final Notice" with delivery confirmation to the address provided on the DS-DE 6 notifying Respondent that the following campaign report, or the required notification that no reportable activity occurred, had not been filed: 2021 M10. The letter was confirmed delivered on December 15, 2021. To review the letter marked "Final Notice" and delivery confirmation, refer to Exhibit 6.

THIS SPACE INTENTIONALLY LEFT BLANK

II. Alleged Violation of Sections 106.07(7), and 106.19(1)(c), Florida Statutes:

9. I investigated whether Respondent violated these sections of the election laws either by not notifying the filing officer, in writing, that no report would be filed due to not receiving any contributions or making expenditures during the following reporting periods or by not filing campaign reports to reflect financial activity for the reporting periods. To review the filing history, refer to Exhibit 7.

Report	Report Cover Period	Due Date	Report or Waiver Required	Exhibit 8 ¹
2021 M9	09/01 – 09/30/21	10/12/21	Waiver ²	8
2021 M10	10/01 – 10/31/21	11/10/21	Waiver ³	8

10. Respondent did not respond to the referral.

11. On May 5, 2022, I called Respondent’s Treasurer for the purpose of providing an opportunity to discuss the allegations made in the referral. Ms. Dennis stated the reports at issue were filed late due to four deaths in her family since the middle of 2021. Ms. Dennis further stated that she has done her best to reconcile the problem. She stated that a bank account had not been opened for Respondent, but she indicated that it would be opened for the upcoming election cycle. She added that there has been no financial activity. Ms. Dennis stated she has not read the *Political Committee Handbook* or Chapter 106, Florida Statutes. To review the phone log, refer to Exhibit 9.

SIGNATURE OF INVESTIGATOR: _____



Date: September 9, 2022

¹ I subpoenaed campaign account records from the designated campaign depository. The campaign depository provided notification declaring that it had no record of a campaign account and/or no records from the account during the relevant timeframe.

² Respondent filed a waiver of the 2021 M9 report on March 20, 2022, which was 159 days late.

³ Respondent filed a waiver of the 2021 M10 report on March 20, 2022, which was 130 days late.

FLORIDA ELECTIONS COMMISSION
REPORT OF INVESTIGATION
Tea Time Political Association – FEC 22-015

LIST OF EXHIBITS	
Exhibits #s	Description of Exhibits
Exhibit 1	Appointment of Campaign Treasurer and Designation of Campaign Depository (DS-DE 6)
Exhibit 2	Statement of Organization (DS-DE 5)
Exhibit 3	Division Acknowledgement Letter
Exhibit 4	First and Second Notices (2021 M9 & 2021 M10)
Exhibit 5	2021 M9 Final Notice and Delivery Confirmation
Exhibit 6	2021 M10 Final Notice and Delivery Confirmation
Exhibit 7	Filing history
Exhibit 8	Bank Declaration Letter
Exhibit 9	Investigation Phone Log

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


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

CHECK APPROPRIATE BOX:

Initial Filing for: Primary Treasurer Deputy Treasurer

OFFICE USE ONLY

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

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

Campaign Treasurer's Acceptance of Appointment

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

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

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

STATEMENT OF ORGANIZATION OF POLITICAL COMMITTEE

(PLEASE TYPE)

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

1. Full Name of Committee Tea Time Political Association	Telephone 407-391-9378
--	----------------------------------

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

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

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

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

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

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

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

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

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

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

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

Full Name	Mailing Address	Office Sought	Party
TBD			

8. List Any Issues this Committee is Supporting: TBD

List Any Issues this Committee is Opposing: TBD

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

TBD

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

We would give the proceeds to a 501c3 non profit

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

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

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

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

STATE OF Florida Seminole COUNTY

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

Organization is complete, true and correct.

X 
Signature of Chairman of Political Committee

6/15/2021
Date



FLORIDA DEPARTMENT *of* STATE

RON DESANTIS
Governor

LAUREL M. LEE
Secretary of State

June 21, 2021

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

Dear Ms. Dennis:

This will acknowledge receipt of the Statement of Organization and Appointment of Campaign Treasurer and Designation of Campaign Depository for **Tea Time Political Association**, which were placed on file in our office on June 17, 2021. This information appears to comply with the requirements of Section 106.03, Florida Statutes, and the name of this organization has been placed on our active committee list as a political committee.

Campaign Treasurer's Reports

Your first campaign treasurer's report will be due on **July 12, 2021**. The report will cover the period of June 1-30, 2021 (2021 M6). All political committees that file reports with the Division of Elections are required to file by means of the Division's Electronic Filing System (EFS).

EFS Access

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

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

Timely Filing

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

Karin Dennis, Chairperson
June 21, 2021
Page Two

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

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

Electronic Receipts

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

Instructions and Assistance

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

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

Please let me know if you need additional information.

Sincerely,



Donna S. Brown, Chief
Bureau of Election Records

DSB/zjs

Enclosures



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

October 13, 2021

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

PAC 79519

Dear Ms. Dennis:

Our records indicate that you have not filed either your campaign treasurer's report or notification that no reportable activity occurred, whichever is applicable. The filing date was October 12, 2021.

The law (s. 106.07(8)(b), Fla. Stat.) requires the filing officer to immediately notify you about the missed filing date and the automatic fines that will be assessed for late filing of a report, if a report was due.

- If reportable activity occurred and you have not filed a report, statutory fines are automatically assessed as follows until you file your report:
 - \$50 per day for the first 3 days late
 - \$500 per day for each day after the 3rd day late
 - If the required report immediately precedes a primary and general election, the automatic fine is \$500 for each late day.

The total fine for the untimely report cannot exceed 25% of the total receipts or expenditures, whichever is greater, for the cover period. Even if you end up filing your report late, we cannot waive the statutory fines. We will notify you of the specific amount of fines owed once you file your report. You have 20 days from the day you receive the notice to pay the fine or to appeal the fine to the Florida Elections Commission.

- If no reportable activity occurred for the report date(s), you are still required to notify us in writing, via the Division's Electronic Filing System, that no reportable activity occurred. No automatic fines are statutorily assessed.

However, in all cases, failure to file and/or untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Donna S. Brown, Chief
Bureau of Election Records

Exhibit 4 Page 1 of 4



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

Second Notice

November 1, 2021

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

PAC 79519

Dear Ms. Dennis:

Our records indicate that you have not filed either your campaign treasurer's report or notification that no reportable activity occurred, whichever is applicable. The filing date was October 12, 2021.

We mailed, via regular mail, the first notice of the failure to file the above-mentioned report or notification to the address on file with our office on October 13, 2021.

The first notice which we provided to you specifically explained the automatic fine provisions in the law (s. 106.07(8)(b), Fla. Stat.) for failure to file a required report. Such fines are continuing to accrue for a late-filed report. Also, that notice explained that if no reportable activity occurred for the report date(s), you are still required to provide notification in writing that no reportable activity occurred. Our initial notice further indicated that, in all cases, failure to file and/or untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

A handwritten signature in black ink that reads "Donna S. Brown".

Donna S. Brown, Chief
Bureau of Election Records



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

November 12, 2021

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

PAC 79519

Dear Ms. Dennis:

Our records indicate that you have not filed either your campaign treasurer's report or notification that no reportable activity occurred, whichever is applicable. The filing date was November 10, 2021.

The law (s. 106.07(8)(b), Fla. Stat.) requires the filing officer to immediately notify you about the missed filing date and the automatic fines that will be assessed for late filing of a report, if a report was due.

- If reportable activity occurred and you have not filed a report, statutory fines are automatically assessed as follows until you file your report:
 - \$50 per day for the first 3 days late
 - \$500 per day for each day after the 3rd day late
 - If the required report immediately precedes a primary and general election, the automatic fine is \$500 for each late day.

The total fine for the untimely report cannot exceed 25% of the total receipts or expenditures, whichever is greater, for the cover period. Even if you end up filing your report late, we cannot waive the statutory fines. We will notify you of the specific amount of fines owed once you file your report. You have 20 days from the day you receive the notice to pay the fine or to appeal the fine to the Florida Elections Commission.

- If no reportable activity occurred for the report date(s), you are still required to notify us in writing, via the Division's Electronic Filing System, that no reportable activity occurred. No automatic fines are statutorily assessed.

However, in all cases, failure to file and/or untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

A handwritten signature in black ink that reads "Donna S. Brown".

Donna S. Brown, Chief
Bureau of Election Records

Exhibit 4 Page 3 of 4



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

Second Notice

November 22, 2021

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

PAC 79519

Dear Ms. Dennis:

Our records indicate that you have not filed either your campaign treasurer's report or notification that no reportable activity occurred, whichever is applicable. The filing date was November 10, 2021.

We mailed, via regular mail, the first notice of the failure to file the above-mentioned report or notification to the address on file with our office on November 12, 2021.

The first notice which we provided to you specifically explained the automatic fine provisions in the law (s. 106.07(8)(b), Fla. Stat.) for failure to file a required report. Such fines are continuing to accrue for a late-filed report. Also, that notice explained that if no reportable activity occurred for the report date(s), you are still required to provide notification in writing that no reportable activity occurred. Our initial notice further indicated that, in all cases, failure to file and/or untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

A handwritten signature in black ink that reads "Donna S. Brown".

Donna S. Brown, Chief
Bureau of Election Records



FLORIDA DEPARTMENT OF STATE
Laurel M. Lee
Secretary of State
DIVISION OF ELECTIONS

Final Notice
Delivery Confirmation:

USPS TRACKING # **9114 9022 0078 9644 8021 49**
& CUSTOMER RECEIPT For Tracking or inquiries go to USPS.com
or call 1-800-222-1811.

November 22, 2021

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

PAC 79519

Dear Ms. Dennis:

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

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2021	M9	9/1/21 - 9/30/21

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

As we stated in the prior notices, even if you now file the report or notification, the untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Donna S. Brown, Chief
Bureau of Election Records

USPS Tracking®

[FAQs >](#)

[Track Another Package +](#)

Tracking Number: 9114902200789644802149

[Remove X](#)

Your item was delivered in or at the mailbox at 11:54 am on November 24, 2021 in SANFORD, FL 32771.

USPS Tracking Plus™ Available [v](#)

Delivered, In/At Mailbox

November 24, 2021 at 11:54 am
SANFORD, FL 32771

Get Updates [v](#)

- Text & Email Updates** [v](#)
- Tracking History** [v](#)
- USPS Tracking Plus™** [v](#)
- Product Information** [v](#)

See Less [^](#)



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

Final Notice

Delivery Confirmation:

USPS TRACKING # 9114 9022 0078 9644 8023 86
& CUSTOMER RECEIPT For Tracking or inquiries go to USPS.com
or call 1-800-222-1811

December 13, 2021

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

PAC 79519

Dear Ms. Dennis:

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

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2021	M10	10/1/21 - 10/31/21

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

As we stated in the prior notices, even if you now file the report or notification, the untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Donna S. Brown, Chief
Bureau of Election Records

USPS Tracking®

[FAQs >](#)

[Track Another Package +](#)

Tracking Number: 9114902200789644802385

[Remove X](#)

Your item was delivered in or at the mailbox at 12:32 pm on December 15, 2021 in SANFORD, FL 32771.

USPS Tracking Plus™ Available [v](#)

Delivered, In/At Mailbox

December 15, 2021 at 12:32 pm
SANFORD, FL 32771

Get Updates [v](#)

- Text & Email Updates** [v](#)
- Tracking History** [v](#)
- USPS Tracking Plus™** [v](#)
- Product Information** [v](#)

See Less [^](#)



Florida Department of State - Division of Elections

Florida Election System Reports

Candidate/Committee Lookup

Name:

Committee Name: Tea Time Political Association

Account: 79519

Election:

Acct:

Type:

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

BANK OF AMERICA 
DE5-024-02-08
PO Box 15047
Wilmington, DE 19850-5047

Subpoena Response

FLORIDA ELECTIONS COMMISSION
BRIAN AYRES, INVESTIGATIONS SPECIALIST
107 W. GAINES STREET
TALLAHASSEE FL 32399

Reference number
D062722000132
Case name
TEA TIME POLITICAL ASSOCIATION
Case number
FEC 22-015
Client name

Date
July 11, 2022

We received a subpoena for this case but can't provide the information requested – here's why.

We can't locate any of the accounts or records requested based on the information provided.

Please forward any additional correspondence to us at Bank of America, DE5-024-02-08, PO Box 15047, Wilmington, DE 19850-5047.

If you have any questions, please call us at 213.580.0702. We're available Monday through Friday, 9 a.m. to 5 p.m. local time. Please have the reference number D062722000132 ready when you call.

**FLORIDA ELECTIONS COMMISSION
PHONE LOG
Case No.: FEC 22-015**

Respondent: Tea Time Political Association

Complainant: Division of Elections

1. **Date and time:** May 4, 2022 @ 1:15 pm
Name: Karin Dennis -Respondent
Phone #: 786-469-0707
Summary: I called Respondent back after the previous call was dropped. The mail inbox was full and I was unable to leave a message. I will try the other phone numbers associated with the Respondent.
Entered by: Brian Ayres

2. **Date and time:** May 4, 2022 @ 1:15 pm
Name: Karin Dennis - Respondent
Phone #: 407-391-9378
Summary: I left a voicemail for Respondent to reach me to conclude our previous conversation.
Entered by: Brian Ayres
Date and time: May 5, 2022 @ 11:00
Name: Karin Dennis - Respondent
Phone #: 786-469-0707
Summary: Respondent answered, however she was with a candidate and I will call in 15 minutes. She said she thought she had filed all reports needed to be filed.
Entered by: Brian Ayres

3. **Date and time:** May 5, 2022 @ 11:15 am
Name: Karin Dennis - Respondent
Phone #: 786-469-0707
Summary: Respondent stated that there has not been a bank account open for Tea Time Political, but it will be opened soon for this upcoming election cycle. Respondent stated that this and the other reports filed late were only because of the loss in her family and she has done her best to reconcile the problem. Respondent stated that with her opening a bank account for the PC she will be sure to follow the election code as well as reach out to her previous PC acquaintance.

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

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

- Why was your 2021 M9 and M10 report not filed by the required date? (M9: 159 days, M10: 100 days)

Lost two uncles, her grandmother, and her cousin. Can present obituaries if needed. A cent has not been raised yet for Tea Time.

- Did you have any financial activity during those periods? (May I have copies of your bank statement? Waivers were filed)

No financial activity was present.

- Have you ever run for public office? If so, please name each office you ran for and state what year each election occurred.

no

- Have you ever been appointed to act as a campaign treasurer for a candidate? If so, please name each such candidate, the office each ran for, and state what year each election occurred.

no

- Have you ever held the office of chairperson, treasurer, or other similar position for a political committee or electioneering communications organization? If so, please name each committee, state the office you held for each, and state when you held each office.

One – pac – best west Orlando (unfounded) but was not in charge of finances

- Have you ever prepared or signed a campaign treasurer’s report? If so, please state the name of the candidate or committee whose report you prepared or signed.

no

- What action have you taken to determine your responsibilities under Florida’s election laws?

She recently went to the Division of Elections and sat down to make sure she followed everything she needed to follow.

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

No -

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

No

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

Not to her recollection

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

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



Florida Elections Commission

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



April 5, 2022

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

RE: Case No.: FEC 22-015; Respondent: Tea Time Political Association

Dear Ms. Dennis:

On January 20, 2022, the Florida Elections Commission received a complaint alleging that your committee violated Florida's election laws. I have reviewed the complaint and find that it contains one or more **legally sufficient allegations**. The Commission staff will investigate the following alleged violations:

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

- 2021 M9
- 2021 M10

Section 106.19(1)(c), Florida Statutes: As alleged in the complaint, Respondent, a political committee registered with the Division of Elections, may have falsely reported, or deliberately failed to include information required by Chapter 106, Florida Statutes, during the following reporting periods:

- 2021 M9
- 2021 M10

When we conclude the investigation, a copy of the Report of Investigation (ROI) will be mailed to you at the above address. Based on the results of the investigation, a staff attorney will prepare and present a written Staff Recommendation (SR) to the Commission as to whether there is probable cause to charge you, the Respondent, with violating Chapters 104 or 106, Florida Statutes. You will have an opportunity to respond to both the ROI and the SR. The Commission will then hold one or more hearings to determine whether the alleged violations occurred and, if so, the amount of the fine to be imposed upon your committee. Notice will be mailed to you and

Karin Dennis, Chairperson
April 5, 2022
Page 2
FEC 22-015

the Complainant at least 14 days before any hearing at which your case is to be considered.

Pursuant to Section 106.25(4)(i)3., Florida Statutes, the Commission may enter into a consent agreement with a Respondent to settle a complaint prior to a finding of probable cause. If you are interested in entering negotiations directed towards reaching a consent agreement to resolve this matter, please contact the Commission and request to speak with the attorney assigned to this case.

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

Pursuant to Section 106.25, Florida Statutes, complaints, investigations, investigative reports, and other documents relating to an alleged violation of Chapters 104 or 106, Florida Statutes, are confidential until the Commission finds probable cause or no probable cause, unless the Respondent files a written waiver of confidentiality with the Commission. The confidentiality provision does not apply to the Complainant or the Respondent.

Should you retain counsel, your attorney must file a notice of appearance with the Commission before any member of the commission staff can discuss this case with him or her.

For additional information, please refer to the “Frequently Asked Questions” section of the Commission’s website.

If you have additional questions, please contact **Brian Ayres**, the investigator assigned to this case, by phone at (850) 922-4539 or by email at Brian.Ayres@myfloridalegal.com.

Sincerely,

A handwritten signature in blue ink that reads "Tim Vaccaro". The signature is fluid and cursive, with a long horizontal stroke at the end.

Tim Vaccaro
Executive Director

TV/mw

**DIVISION OF ELECTIONS
FEC NOTICE FORM**

To FEC from Division of Elections

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

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

The following reports are outstanding after notification:

2021 M9

2021 M10

- Tea Time Political Association (79519) is a political committee registered with the Division of Elections. On June 17, 2021, the committee filed the DSDE 5 and DSDE 6 with the Division indicating that Karin Dennis was the chairperson.
- The 2021 M9 campaign treasurer's report was due on October 12, 2021. On October 13, 2021, the Division mailed Tea Time Political Association notification that the 2021 M9 campaign treasurer's report had not been filed.
- On November 1, 2021, the Division mailed Tea Time Political Association notification that the 2021 M9 campaign treasurer's report had not been filed.
- On November 22, 2021, the Division mailed Tea Time Political Association final notification with delivery confirmation that the 2021 M9 report had not been filed. (See attached letter and delivery confirmation.)

- The 2021 M10 campaign treasurer's report was due on November 10, 2021. On November 12, 2021, the Division mailed Tea Time Political Association notification that the 2021 M10 campaign treasurer's report had not been filed.
- On November 22, 2021, the Division mailed Tea Time Political Association notification that the 2021 M10 campaign treasurer's report had not been filed.
- On December 13, 2021, the Division mailed Tea Time Political Association final notification with delivery confirmation that the 2021 M10 report had not been filed. (See attached letter and delivery confirmation.)
- The committee did not notify the Division of Elections prior to or on the prescribed reporting dates for the reports that no reports were to be filed.
- As of January 13, 2022, Tea Time Political Association has not filed the 2021 M9 and 2021 M10 reports.

Sent By: Donna S. Brown *DSB*

Date: January 13, 2022

kaf



FLORIDA DEPARTMENT OF STATE

Laurel M. Lee

Secretary of State

DIVISION OF ELECTIONS

**Final Notice
Delivery Confirmation:**

USPS TRACKING # **9114 9022 0078 9644 8021 49**
& CUSTOMER RECEIPT For Tracking or inquiries go to USPS.com
or call 1-800-222-1811.

November 22, 2021

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

PAC 79519

Dear Ms. Dennis:

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

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2021	M9	9/1/21 - 9/30/21

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

As we stated in the prior notices, even if you now file the report or notification, the untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Donna S. Brown, Chief
Bureau of Election Records

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FLORIDA DEPARTMENT OF STATE

Laurel M. Lee
Secretary of State

DIVISION OF ELECTIONS

Final Notice
Delivery Confirmation:

USPS TRACKING # **9114 9022 0078 9644 8023 86**
& CUSTOMER RECEIPT
For Tracking or Inquiries go to USPS.com
or call 1-800-222-1811

December 13, 2021

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

PAC 79519

Dear Ms. Dennis:

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

<u>Year</u>	<u>Report</u>	<u>Cover Period</u>
2021	M10	10/1/21 - 10/31/21

The Division has previously notified you of the unfiled report or notification. Please file your report or notification. If the report is not filed within 7 days of receipt of this letter, the Division will refer this matter to the Florida Elections Commission, which may impose civil penalties of up to \$1000 per violation, apart from that automatic fine provisions of s. 106.07(8)(b), Fla. Stat.) that are applicable only to campaign finance reports.

As we stated in the prior notices, even if you now file the report or notification, the untimely filing of a report of reportable activity, or if applicable, a notice that no reportable activity occurred, may constitute an apparent violation of chapter 106, Fla. Stat. If we refer such matter to the Florida Elections Commission, the Commission may subsequently impose a civil penalty for each violation under chapter 106.265(1), Fla. Stat.

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

Sincerely,

Donna S. Brown, Chief
Bureau of Election Records

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Tracking Number: 9114902200789644802385

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