

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: St. Pete Chamber PAC

Case No.: FEC 22-286

TO: Laura Boehmer, Chair
100 2nd Avenue, #150
St. Petersburg, FL 33701-3701

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, **August 15, 2023 at 8:30 a.m.**, or as soon thereafter as the parties can be heard, at the following location: **Virtual Meeting via GoTo Webinar:**

WEB PARTICIPATION: <https://attendee.gotowebinar.com/register/4391393799096818270>

AUDIO PARTICIPATION: 1 877 309 2074 **ATTENDEE ACCESS CODE:** 424-284-031

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
August 1, 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.

FILED ELECTIONS COMMISSION
TALLAHASSEE, FLORIDA
MAY 16 2023

STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION

Florida Elections Commission,
Petitioner,

Case No.: FEC 22-286

v.

St. Pete Chamber PAC,
Respondent.

_____ /

ORDER OF PROBABLE CAUSE

THIS MATTER was heard by the Florida Elections Commission (Commission) at its regularly scheduled meeting on May 16, 2023, in Tallahassee, Florida.

On January 5, 2023, Staff recommended to the Commission that there was probable cause to believe that the Florida Election Code was violated. The facts articulated in Staff's Recommendation are adopted by reference and incorporated herein. Based on the Complaint, Report of Investigation, Staff's Recommendation, and oral statements (if any) made at the probable cause hearing, the Commission finds that there is **probable cause** to charge Respondent with the following violation(s):

Count 1:

On or about July 1, 2022, St. Pete Chamber PAC 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 2022 P1A Report.

Count 2:

On or about July 15, 2022, St. Pete Chamber PAC 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 2022 P2A Report.

Count 3:

On or about July 22, 2022, St. Pete Chamber PAC 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 2022 P3 Report.

Count 4:

On or about July 29, 2022, St. Pete Chamber PAC 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 2022 P4 Report.

DONE AND ORDERED by the Florida Elections Commission on May 16, 2023.



Tim Vaccaro, J.D., Executive Director
For Joni Alexis Poitier, Vice Chair
Florida Elections Commission

Copies furnished to:
Stephanie J. Cunningham, General Counsel
St. Pete Chamber PAC, Respondent
Division of Elections, Complainant

NOTICE OF RIGHT TO A HEARING

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

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

will consider and determine willfulness at an informal hearing. Otherwise, live witness testimony is unnecessary.

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

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

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

**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: St. Pete Chamber PAC

Case No.: FEC 22-286

TO: Laura Boehmer, Chair
100 2nd Avenue, # 150
St. Petersburg, FL 33701-3701

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

NOTICE OF HEARING (PROBABLE CAUSE DETERMINATION)

A hearing will be held in this case before the Florida Elections Commission on, **May 16, 2023 at 8:30**, or as soon thereafter as the parties can be heard, at the following location: **Join Zoom Meeting:**

https://us06web.zoom.us/join/register/tZMpduMuqTsqGt1MNuVpQBO15XPapAI_9zfC

Audio Participation:
Dial: 1 301 715 8592

Meeting ID:
874 1067 0009

Passcode:
772737

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

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Tim Vaccaro

Executive Director
Florida Elections Commission
May 2, 2023

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Case No. FEC 22-286Christie Bruner to: FEC@myfloridalegal.com 05/01/2023 02:33 PM
From: "Christie Bruner" <cbruner@stpete.com>
To: "FEC@myfloridalegal.com" <FEC@myfloridalegal.com>

Hello,

I wanted to follow up on the closing of the St. Pete Chamber PAC and what steps need to be taken by our Chamber to recuperate the funds. Thank you in advance.

-Christie Bruner



Christie Bruner

Vice President of Advocacy
St. Petersburg Area Chamber of Commerce
Innovation. Excellence. Inclusivity. Accountability. Integrity.
The Chamber Building
100 Second Avenue North, Suite 150
St. Petersburg, FL 33701
C: 727.637.7913

stpete.com



**STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION**

In Re: St. Pete Chamber PAC

Case No.: FEC 22-286

STAFF RECOMMENDATION FOLLOWING INVESTIGATION

Pursuant to Section 106.25(4)(c), Florida Statutes, undersigned staff counsel files this written recommendation for disposition of the referral in this case recommending that there is **probable cause** to charge Respondent with violating **Section 106.07(7), Florida Statutes**. Based upon a thorough review of the Report of Investigation submitted on December 9, 2022, the following facts and law support this staff recommendation:

1. On September 7, 2022, the Florida Elections Commission (“Commission”) received a referral from the Department of State, Division of Elections (“Division”), alleging that St. Pete Chamber PAC (“Respondent”) violated Chapter 106, Florida Statutes.

2. Respondent was a political committee formerly registered with the Division. (ROI Exhibit 3)¹ On October 25, 2022, Respondent’s registration as a political committee was cancelled by the Division. (ROI Exhibit 1, pages 1-3)

3. By letter dated October 10, 2022, the Executive Director notified Respondent that Commission staff would investigate the following statutory provision:

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

- 2022 P1A
- 2022 P2A
- 2022 P3
- 2022 P4

4. By letter dated October 10, 2013, Kristi Reid Bronson, Chief, Bureau of Election Records, sent Respondent a letter acknowledging that the Division had received its Statement of Organization and Appointment of Campaign Treasurer and Designation of Campaign Depository for Political Committees forms. (ROI Exhibit 4, page 1)

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

5. The acknowledgment letter advised Respondent that all of the Division’s publications and reporting forms were available on its website and directed Respondent to print out the *Calendar of Reporting Dates* as well as other relevant documents. (ROI Exhibit 4, page 3)

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

7. The *Political Committee Handbook* references the statutory requirement regarding written notification and directs political committees to notify the Division by way of the Division’s electronic filing system. (ROI Exhibit 5, page 3) The *Political Committee EFS User’s Guide* shows the process through which to notify the Division. The user’s guide instructs political committees to select the relevant reporting period and place a checkmark in a box titled “Waiver” to indicate the lack of reportable financial activity. (ROI Exhibit 6, pages 2-3)

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

Report	Report Cover Period	Date Notification Due	Date Notification Filed	No. of Days Late
2022 P1A	6/18/22 – 6/24/22	7/1/22	7/8/22	7
2022 P2A	7/2/22 – 7/8/22	7/15/22	7/27/22	12
2022 P3	7/9/22 – 7/15/22	7/22/22	8/4/22	13
2022 P4	7/16/22 – 7/22/22	7/29/22	8/4/22	6

9. Laura Boehmer, former chairperson for Respondent, denied being involved with the committee beyond 2019 and did not provide a response as to why the committee failed to timely submit notices of no activity. (ROI Exhibit 10, page 2)

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

11. The facts set forth above show that Respondent was a political committee formerly registered with the Division. Respondent failed to notify the filing officer on the prescribed

reporting dates that no reports would be filed for the following reporting periods: 2022 P1A, 2022 P2A, 2022 P3, and 2022 P4.

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 July 1, 2022, St. Pete Chamber PAC 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 2022 P1A Report.

Count 2:

On or about July 15, 2022, St. Pete Chamber PAC 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 2022 P2A Report.

Count 3:

On or about July 22, 2022, St. Pete Chamber PAC 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 2022 P3 Report.

Count 4:

On or about July 29, 2022, St. Pete Chamber PAC 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 2022 P4 Report.

Respectfully submitted on January 5, 2023.



Stephanie J. Cunningham
General Counsel

I reviewed this Staff Recommendation this 6th day of January 2023.

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

Tim Vaccaro
Executive Director

FLORIDA ELECTIONS COMMISSION

Report of Investigation for Failure to Notify Filing Officer

Case Number: FEC 22-286

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

Respondent: St. Pete Chamber PAC

Respondent's Atty: N/A

Division of Elections (Division)

Referral Filed: September 7, 2022

Respondent Type: Political Committee

I. Preliminary Information:

1. Respondent was a political committee formerly registered with the Division. To review the Final Order canceling Respondent's registration, refer to Exhibit 1.

2. An Appointment of Campaign Treasurer and Designation of Campaign Depository (DS-DE 6) was filed on September 30, 2013. Anne Drake McMullen was appointed as campaign treasurer. To review the DS-DE 6s, refer to Exhibit 2.¹

3. A Statement of Organization (DS-DE 5) for the political committee was filed with the Division on September 30, 2013. To review the Statement of Organization, refer to Exhibit 3.

4. An acknowledgement letter was mailed to the address provided on the DS-DE 5 on October 10, 2013, advising Respondent that all political committees filing reports with the Division are required to file by means of the Division's electronic filing system (EFS). Respondent was provided with a user identification number and initial password allowing access to the EFS.

5. The acknowledgement letter also advised Respondent that all of the Division's publications and reporting forms are available on their website, including Chapter 106, Florida Statutes, the *Political Committee Handbook*, and the *Calendar of Reporting Dates*. The letter further advised that it was Respondent's responsibility to read, understand, and follow the requirements of Florida's election laws. To review the acknowledgement letters, refer to Exhibit 4.²

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

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

THIS SPACE INTENTIONALLY LEFT BLANK

¹ Another form was filed on September 13, 2019, appointing Matthew Lettelleir as the new treasurer.

² A similar acknowledgment letter was sent to Mr. Lettelleir upon his appointment as treasurer.

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

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

Report	Report Cover Period	Date Notification Due	Date Notification Filed	No. of Days Late
2022 P1A	6/18/22 – 6/24/22	7/1/22	7/8/22	7
2022 P2A	7/2/22 – 7/8/22	7/15/22	7/27/22	12
2022 P3	7/9/22 – 7/15/22	7/22/22	8/4/22	13
2022 P4	7/16/22 – 7/22/22	7/29/22	8/4/22	6

9. Respondent did not respond to the referral.

10. On October 13, 2022, I spoke with Respondent’s Chairperson, Laura Boehmer, to provide an opportunity to discuss the allegations made in the referral. Ms. Boehmer indicated that she was unaware she was listed as Respondent’s Chairperson, as she has not been involved with Respondent for years.³ She stated that she was never aware of any problems regarding waivers and had nothing to do with filing campaign reports or waivers. Further, Ms. Boehmer indicated that she had no information about Respondent’s administrative or financial affairs. Ms. Boehmer stated she is taking immediate steps to remove herself as Respondent’s chairperson.⁴ Lastly, Ms. Boehmer stated that she did not have and had not read Chapter 106, Florida Statutes, or the *Political Committee Handbook*. To review the phone log, refer to Exhibit 10.

SIGNATURE OF INVESTIGATOR:



Date: December 9, 2022

³ Ms. Boehmer was appointed Chairperson by letter filed with the Division on October 30, 2018. Ms. Boehmer did not sign the letter, which was signed by a deputy treasurer. However, in the interview, Ms. Boehmer also stated that she allowed herself to be listed as the Chairperson in 2018 or 2019. An acknowledgment letter was sent to her by the Division on November 1, 2018. To review the letters, refer to Exhibit 8.

⁴ Ms. Boehmer explained that she was contacted by Mr. Lettelleir in 2020, at which time he asked her to sign a document affirming her role as Chairperson. She declined to sign anything and indicated that she believed she was done with the committee. During the investigation, I received an email from Christie Bruner, who stated she was new to her role with Respondent, and her name was not yet on the account. She indicated that, due to inactivity, they might be interested in disbanding Respondent. To review the email, refer to Exhibit 9.

FLORIDA ELECTIONS COMMISSION
REPORT OF INVESTIGATION
St. Pete Chamber PAC -- FEC 22-286

LIST OF EXHIBITS	
Exhibits #s	Description of Exhibits
Exhibit 1	Final Order
Exhibit 2	DS-DE 6s
Exhibit 3	Statement of Organization
Exhibit 4	Acknowledgment Letter
Exhibit 5	<i>Political Committee Handbook</i> pages
Exhibit 6	<i>EFS User's Guide</i> pages
Exhibit 7	Filing History
Exhibit 8	Acknowledgment Letters
Exhibit 9	Email from Ms. Bruner
Exhibit 10	Phone Log

STATE OF FLORIDA
DEPARTMENT OF STATE

FILED
Stephanie B.

OCT 25 2022

AGENCY CLERK
DEPARTMENT OF STATE

ST. PETE CHAMBER PAC (61119),

Petitioner,

v.

DEPARTMENT OF STATE, DIVISION OF
ELECTIONS,

Final Order No. DOS 22-26 DE

Respondent.

_____ /

FINAL ORDER

This cause was referred to the Florida Elections Commission ("Commission") for the purpose of conducting a hearing not involving disputed issues of material fact, pursuant to section 120.569 and 120.57(2), Florida Statutes. The sole issue before the Commission was whether the Florida Department of State, Division of Elections ("the Division") should proceed in the canceling of ST. PETE CHAMBER PAC ("Petitioner") registration as a political committee due to limited activity. The Commission hereby entered a Recommended Final Order and referred the matter back to the Division for entry of a Final Order. The Recommended Final Order dated September 2, 2022, is attached to this Final Order and incorporated herein by reference.

CONCLUSIONS OF LAW

The Division adopts the conclusions of law set forth in the Recommended Final Order.


FINDINGS OF FACT

The Division adopts the conclusions of fact set forth in the Recommended Final Order.

CONCLUSION

Based upon the foregoing and a complete review of the record, it is ORDERED that Petitioner's registration as a political committee with the Florida Department of State, Division of Elections, shall be canceled.

DONE AND ORDERED at Tallahassee, Florida, this 25 day of October, 2022.



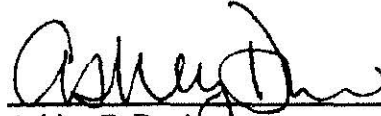
Maria L. Matthews, Director
Division of Elections

NOTICE OF RIGHTS

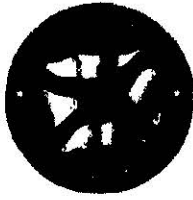
This Order constitutes final agency action. Judicial review may be sought pursuant to Section 120.68, Florida Statutes, by filing a notice of appeal in the First District Court of Appeal, and a copy with the clerk of the Department of State. Such notice must be filed within 30 calendar days of the date indicated in the Certificate of Service.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the foregoing Final Order was hand-delivered to the Agency Clerk, Department of State, R.A. Gray Building, 500 South Bronough Street, Tallahassee, Florida 32399-0250 and that a true and correct copy of the foregoing Final Order was mailed on this 25 day of October, 2022, by certified U.S. mail to Travis Norton, Registered Agent, St. Pete Chamber PAC, 100 2nd Avenue, Suite 150, St. Petersburg, FL 33701.

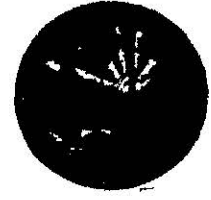


Ashley E. Davis
Deputy General Counsel
Florida Department of State
Florida Bar No. 48032
500 S. Bronough Street
Tallahassee, Florida 32399



Florida Elections Commission

107 West Gaines Street, Suite 224 Tallahassee, Florida 32399-1050
Telephone: (850) 922-4539 · Facsimile: (850) 921-0783
FEC@myfloridalegal.com · www.fec.state.fl.us



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DEPARTMENT OF STATE
2022 SEP - 8 AM 11:18
DIVISION OF ELECTIONS
TALLAHASSEE, FL

September 2, 2022

St. Pete Chamber PAC
Christina Bruner, Treasurer
100 Second Avenue North, Suite 150
St. Petersburg, FL 33701

RE: Case No.: FEC 22-075; Respondent: St. Pete Chamber PAC

Dear Ms. Bruner:

The Florida Elections Commission at its last regularly scheduled meeting considered this case and entered the enclosed order. Please read the order carefully.

Please let me know if you have any questions or if I can be of any further assistance.

Sincerely,

Donna Ann Malphurs
Donna Ann Malphurs
Agency Clerk/Public Information Officer

/dam

Enclosure: Executed Order

✓cc: Division of Elections, Complainant

STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION

In Re: St. Pete Chamber PAC

Case No.: FEC 22-075

RECOMMENDED
FINAL ORDER

This matter came before the Florida Elections Commission (“Commission”) at its regularly scheduled meeting on August 16, 2022, in Tallahassee, Florida, for the purpose of conducting a hearing not involving disputed issues of material fact, pursuant to sections 120.569 and 120.57(2), Florida Statutes.

Appearances

For the Division of Elections: No Appearance

For St. Pete Chamber PAC: No Appearance

For the Commission: Todd Smith-Schoenwalder
107 West Gaines Street
Collins Building, Suite 224
Tallahassee, Florida 32399

The sole issue before the Commission was whether the Division of Elections (“Petitioner”) should proceed in the cancelling of St. Pete Chamber PAC’s (“Respondent”) registration as a political committee due to limited activity.

The Commission hereby enters its Recommended Final Order and refers the matter back to Petitioner for entry of a Final Order.

Undisputed Facts

1. Respondent is a political committee registered with Petitioner pursuant to section 106.03, Florida Statutes.

FLORIDA ELECTIONS COMMISSION
2 SEP 22 AM 10:54
1000 SUNDGATE BLVD

2. On January 28, 2022, Petitioner mailed an Initial Notice of Intent to Cancel Registration to Respondent notifying Respondent that it had limited activity during the 2020 and 2021 calendar years and that the committee's registration was subject to cancellation.

3. On February 28, 2022, Petitioner mailed a Final Notice of Intent to Cancel Registration to Respondent notifying Respondent that it failed to provide a response or object to the cancellation of the committee.

4. On or about March 10, 2022, Respondent appealed Petitioner's Final Notice of Intent to Cancel stating that it was planning to reengage in the near future.

Conclusions of Law

5. Petitioner has jurisdiction to administer and enforce the provisions of section 106.03, Florida Statutes, as they pertain to the registration of a political committee and the cancellation of that registration due to limited activity pursuant to Rule 1S-2.021(2)(e), Florida Administrative Code.


6. Rule 1S-2.021(2)(e), Florida Administrative Code, requires the Petitioner, after notice and due process, to cancel a political committee's registration if the committee has limited activity.

THIS SPACE INTENTIONALLY LEFT BLANK

Recommendation for Final Agency Action

Based on the foregoing Findings of Fact and Conclusions of Law, it is **RECOMMENDED** that Petitioner enters a *Final Order* that cancels Respondent's registration.

DONE AND ORDERED by the Florida Elections Commission on August 16, 2022.



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

Copies furnished to:
St. Pete Chamber PAC, Respondent
Division of Elections, Petitioner

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

RECEIVED
DEPARTMENT OF STATE

2013 SEP 30 AM 9:33

DIVISION OF ELECTIONS
TALLAHASSEE, FL

CHECK APPROPRIATE BOX:

OFFICE USE ONLY

Original Appointment of Treasurer Reappointment of Treasurer Deputy Treasurer

1 Committee or Organization St. Pete Chamber PAC	2 Telephone (727) 821-4069
---	--------------------------------

3 Name of Treasurer or Deputy Treasurer Anne Drake McMullen	4 Email (optional)	5 Telephone (optional) (727) 898-3073
--	--------------------	---

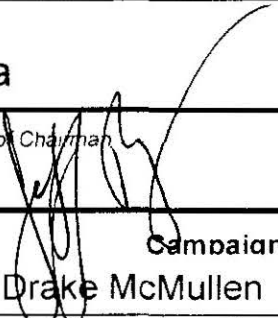
6 Mailing Address
333 3rd Avenue N., Suite 300 St. Petersburg, Florida 33701

7 Street Address
333 3rd Avenue N., Suite 300 St. Petersburg, Florida 33701

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

9 Name of Bank Bank of America	10 Street Address P.O. Box 25118
-----------------------------------	-------------------------------------

11 City Tampa	12 State Florida	13 Zip Code 33622-5118
------------------	---------------------	---------------------------

14 Signature of Chairman 	15 Name of Chairman (Print or Type) Jeff Rogo
---	--

Campaign Treasurer's Acceptance of Appointment

I, Anne Drake McMullen, do hereby accept the appointment as
(Please Print or Type)

treasurer or deputy treasurer for St. Pete Chamber PAC
(Committee or Organization)

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

9-27-13 X Anne Drake McMullen
Date Signature of Campaign Treasurer or Deputy Treasurer

**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
2019 SEP 13 AM 9:22
FLORIDA STATE
DIVISION OF ELECTIONS

CHECK APPROPRIATE BOX:

Initial Filing for: Primary Treasurer Deputy Treasurer

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

OFFICE USE ONLY

1. Committee
St. Pete Chamber PAC

2. Telephone
(727) 388-0682

3. Name of Treasurer or Deputy Treasurer 4. Email (optional)
Matthew Lettelleir

5. Telephone (optional)
()

6. Mailing Address
100 2nd Ave N #150

7. Street Address
100 2nd Ave N #150, St. Petersburg, FL 33701

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

9. Name of Bank

10. Street Address

11. City

12. State

13. Zip Code

14. Signature of Chairman

15. Name of Chairman (Print or Type)
Laura Boehmer

Campaign Treasurer's Acceptance of Appointment

Matthew Lettelleir

I, _____, do hereby accept the appointment as
(Please Print or Type)

treasurer or deputy treasurer for **St. Pete Chamber PAC**

(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.**

9/10/19

Date

X

Signature of Campaign Treasurer or Deputy Treasurer

RECEIVED
DEPARTMENT OF STATE

OFFICE USE ONLY

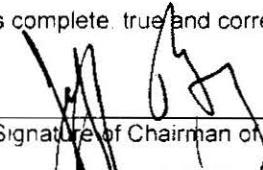
2013 SEP 30 AM 9:33

DIVISION OF ELECTIONS
TALLAHASSEE, FL

**STATEMENT OF ORGANIZATION
OF POLITICAL COMMITTEE**

(PLEASE TYPE)

1. Full Name of Committee		Telephone
St. Pete Chamber PAC		727.821.4069
Mailing Address (include city, state and zip code)		
100 Second Avenue N., Suite 150 St. Petersburg, Florida 33701-3351		
Street Address (include city, state and zip code)		
100 Second Avenue N., Suite 150 St. Petersburg, Florida 33701-3351		
2. Affiliated or Connected Organizations (includes other committees of continuous existence and political committees)		
Name of Affiliated or Connected Organization	Mailing Address	Relationship
St. Petersburg Chamber of Commerce	100 Second Avenue N., Suite 150 St. Petersburg, Florida 33701-3351	Sponsor
3. Area, Scope and Jurisdiction of the Committee		
City of St. Petersburg, Florida, Pinellas County, State of Florida		
4. Nature of Organization or Organization's Special Interest (e.g., medical, legal, education, etc.)		
The organization supports a pro-business environment and enhanced quality of life for the greater St. Petersburg, Florida area		
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
Anne Drake McMullen	Doyle Wealth Management, Inc. 333 3rd Avenue N. Suite 300 St. Petersburg, Florida 33701	Treasurer

6. List by Name, Address and Position, Other Principal Officers, Including Officers and Members of the Finance Committee, If Any (include chairman's name)			
Full Name	Mailing Address	Committee Title or Position	
Jeff Rogo	19031 North Dale Mabry Highway Lutz, Florida 33548	Chairman	
7. List by Name, Address, Office Sought and Party Affiliation Each Candidate or Other Individual that this Committee is Supporting (if none, please indicate)			
Full Name	Mailing Address	Office Sought	Party
To be determined			
8. List Any Issues this Committee is Supporting: To be determined List Any Issues this Committee is Opposing: To be determined			
9. If this Committee is Supporting the Entire Ticket of a Party, Give Name of Party			
No			
10. In the Event of Dissolution, What Disposition will be Made of Residual Funds?			
St. Petersburg Area Chamber Foundation			
11. List all Banks, Safety Deposit Boxes, or Other Depositories Used for Committee Funds			
Name of Bank or Depository & Account Number		Mailing Address	
Bank of America [REDACTED]		P.O. Box 25118 Tampa, Florida 33622-5118	
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
None			
STATE OF <u>Florida</u>		<u>Pinellas</u> COUNTY	
I, <u>Jeff Rogo</u> , certify that the information in this Statement of			
Organization is complete, true and correct			
X 		<u>9/27/13</u>	
Signature of Chairman of Political Committee		Date	



FLORIDA DEPARTMENT *of* STATE

RICK SCOTT
Governor

KEN DETZNER
Secretary of State

October 10, 2013

Jeff Rogo, Chairperson
St. Pete Chamber PAC
19031 North Dale Mabry Highway
Lutz, Florida 33548

Dear Mr. Rogo:

This will acknowledge receipt of the Statement of Organization and Appointment of Campaign Treasurer and Designation of Campaign Depository for **St. Pete Chamber PAC**, which were placed on file in our office on October 10, 2013. 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 that supports both candidates and issues.

Campaign Treasurer's Reports

Your first campaign treasurer's report will be due on **November 12, 2013**. The report will cover the period of October 1-31, 2013 (M10). 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).

Credentials and Sign-ons

Below is the web address to access the EFS and the committee's user identification number. The enclosed sealed envelope contains the committee's initial password. Once you have logged in using the initial password, you will be immediately prompted to change it to a confidential sign-on. The chairperson, campaign treasurer, and deputy treasurers are responsible for protecting this password from disclosure and are responsible for all filings using these credentials, unless the Division is notified that your credentials have been compromised.

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

Identification Number: 61119

Division of Elections

R.A. Gray Bldg., Rm. 316 • 500 S Bronough St. • Tallahassee, Florida 32399-0250
Telephone: (850) 245-6240 • Facsimile: (850) 245-6259 elections.myflorida.com
Commemorating 500 years of Florida history www.fla500.com



Mr. Jeff Rogo, Chairperson
October 10, 2013
Page Two

Pin Numbers

Pin numbers are confidential secure credentials that allow you to submit reports and update information. The enclosed sealed envelope provides a confidential pin number for the chairperson. By copy of this letter, a confidential pin number to access the EFS was sent to the treasurer.

Each political committee chairperson is required to provide the Division of Elections with confidential personal information that may be used to allow access in the event that the password is forgotten or lost. When you enter the campaign account screen, there will be a drop down box where you pick a question (such as *What is your mother's maiden name?*) and supply an answer. All passwords and answers to questions are stored as encrypted data and cannot be viewed by Division staff and given out over the phone. Please notify the Division if your credentials have been compromised.

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

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

Electronic Receipts

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

Mr. Jeff Rogo, Chairperson
October 10, 2013
Page Three

Instructions and Assistance

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

All of the Division's publications and reporting forms are available on the Division of Elections' website at <http://elections.myflorida.com>. 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, 2012 Political Committee Handbook, 2013 Calendar of Reporting Dates, and Rule 1S-2.017, Florida Administrative Code.

Please let me know if you need additional information.

Sincerely,



Kristi Reid Bronson, Chief
Bureau of Election Records

KRB/mcc

Enclosures

pc: Anne Drake McMullen, Treasurer



FLORIDA DEPARTMENT *of* STATE

RON DESANTIS
Governor

LAUREL M. LEE
Secretary of State

September 16, 2019

Matthew Lettelleir, Treasurer
St. Pete Chamber PAC (61119)
100 2nd Avenue North #150
St. Petersburg, Florida 33701

Dear Mr. Lettelleir:

Your appointment as campaign treasurer for **St. Pete Chamber PAC** was filed in this office on September 13, 2019. Enclosed is your confidential pin number to access the Division's Electronic Filing System (EFS) for submitting campaign treasurer's reports.

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.

If you have questions concerning your campaign account or the EFS, you may call the Help Desk at (850) 245-6280.

Sincerely,

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

Kristi Reid Willis, Chief
Bureau of Election Records

KRW/dlh

Enclosures

pc: Laura Boehmer, Chairperson

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



Political Committee Handbook



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

(Rev. 9/27/2019)

Chapter 10: Filing Campaign Reports

Each campaign treasurer designated by a political committee shall file regular reports of all contributions received and all expenditures made by or on behalf of such political committee.

The chairperson and campaign treasurer shall certify as to the correctness of each report. Each person so certifying shall bear the responsibility for the accuracy and veracity of each report. Any campaign treasurer or chairperson who willfully certifies the correctness of any report while knowing that such report is incorrect, false or incomplete commits a misdemeanor of the first degree.

(Sections [106.011](#) and [106.07](#), Fla. Stat.)

Where to File

A campaign treasurer is required to file campaign treasurer's reports with the filing officer with whom the political committee registers.

Committees filing reports with the Division are required to file using the [Electronic Filing System](#) (see [Chapter 11: Electronic Filing of Campaign Reports](#)). If the committee's filing officer is other than the Division, contact the appropriate filing officer to find out the requirements.

The web address for filing online with the Division is: efs.dos.state.fl.us.

(Section [106.07\(2\)](#), Fla. Stat.)

When to File

Reports must be filed on the 10th day following the end of each calendar month from the time the committee registers, except that, if the 10th day occurs on a Saturday, Sunday, or legal holiday, the report shall be filed on the next business day that is not a Saturday, Sunday, or legal holiday.

A political committee required to file reports with the Division must file:

1. On the 60th day immediately preceding the primary election, and each week thereafter, with the last weekly report being filed on the 4th day immediately preceding the general election.
2. On the 10th day immediately preceding the general election, and each day thereafter, with the last daily report being filed the 5th day immediately preceding the general election.

For political committees that file with the Division, see the Division's website for a calendar of [Campaign Finance Reporting Dates](#).

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

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

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

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

Penalty for Late Filing

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

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

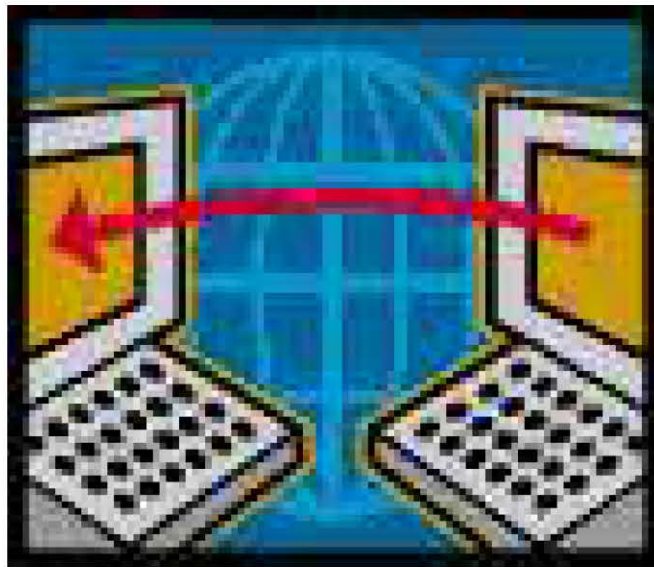
Notice of No Activity

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

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

**Department of State
Division of Elections**

Political Committee EFS User's Guide



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

EFS HELP LINE: 850-245-6280

January 2011

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

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

Create a New Report by Data Entry

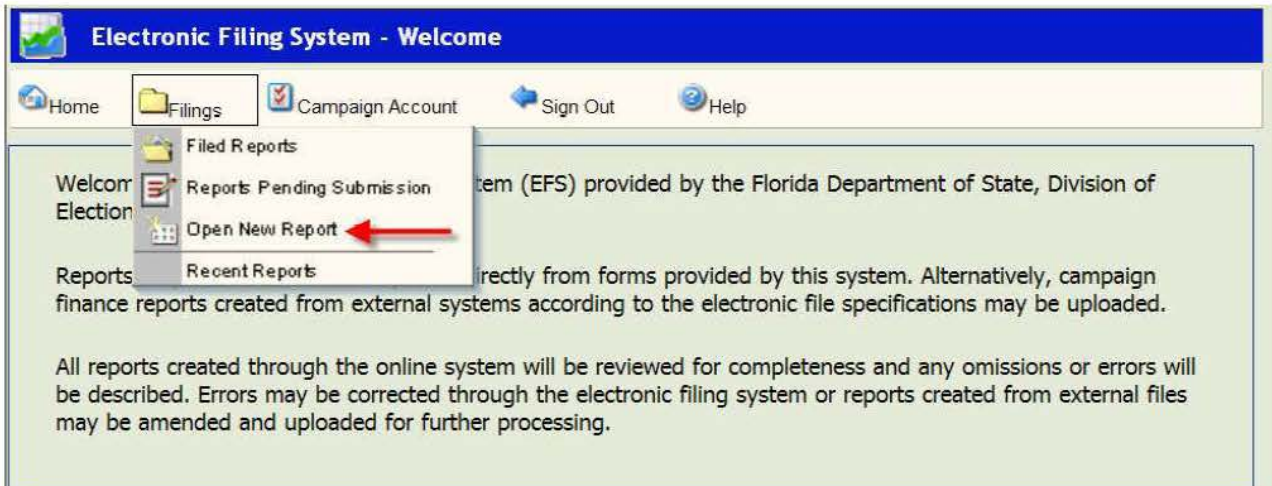
From the Welcome screen, click



and then



Open New Report



Use this form to submit an original report. To submit an amendment to a previously filed report, first select the report from the 'Filed Reports' listing and then choose the 'Amend Report' option from the 'Edit' menu item.

Coverage Periods
Campaign finance reports itemize financial activity occurring during a specific reporting period. The reporting period is declared by first selecting the reporting year and then the report type. The beginning and ending coverage dates and the filing due date of the report are automatically associated with the *Reporting Year* and *Report Type*.

Election Cycle:

Report Type:

Coverage Period: Due Date:

Special Election Report Waiver

Uploading a Campaign Finance Report
A Campaign Finance report file meeting the department's specifications may be uploaded at the time a report is opened. Use the Browse button to locate and select the report text or zip file to be uploaded. You may upload the report file in a compressed zip. The zip file must contain only one report file.

Click  arrow next to **Election Cycle**. Scroll to the cycle associated with the report you are entering.

Click  arrow next to **Report Type** select report type corresponding to the correct cover period and due date.

The **Cover Period** dates will automatically fill in based on the **Calendar of Election and Reporting Dates**.

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

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

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

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

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

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

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

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

Review Messages

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

File the Report

If the **Review Status** is Updated Detail – Needs Review the report has not been reviewed since the last update. (See page 39 for instructions on how to submit the report to the system for review.)

If the status of the report is Complete Detail Records, you are ready to file the report.

Report: 2010 - F3 - 26 2010 General Election Covers: 8/7/2010-8/19/2010 Due: 8/20/2010

Amendment Waiver Complete Status: Complete Detail Records

File Date: Review Status: Reviewed

Status: Data Entry Last Review: 8/19/2010 3:56:42 PM

of Transactions: 1

Contributions		Total Amount	Expenditures		Total Amount
Cash and Checks:	<input type="text"/>	0.00	Monetary:	<input type="text"/>	51.00
Loans:	<input type="text"/>	0.00	Transfers to Off Acct:	<input type="text"/>	0.00
Total Monetary:	<input type="text"/>	0.00	Total Monetary:	<input type="text"/>	51.00
In-Kind:	<input type="text"/>	0.00	Other Distributions:	<input type="text"/>	0.00

Review Messages:

Created: 8/19/2010 2:01:35 PM By: 50552 Revised: 8/19/2010 3:56:42 PM By: 50552

Click on .

The chairperson enters his or her PIN, and then selects .

NOTE: A PIN is the same as your signature attesting to the validity of the report.

Step 1: Enter the candidate/chairperson PIN.

Step 2: Select the 'Report Approved' button.

Report: 2010 - F3 - 26 Coverage Period: 8/7/2010-8/19/2010 Due: 8/20/2010

Review Status: Reviewed

Original Amended

Waiver

PIN for Candidate/Chairperson:

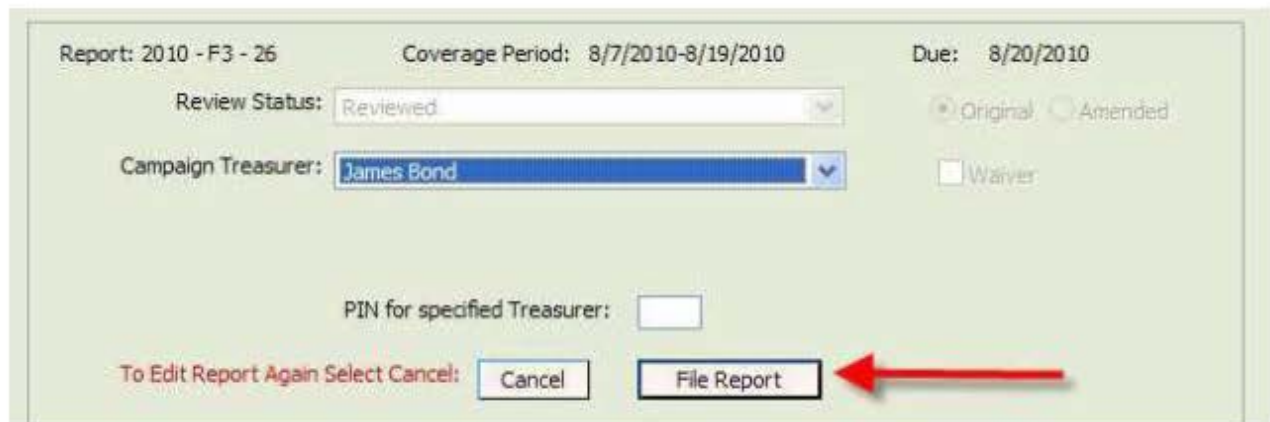
If there is more than one treasurer, click on the drop down and select the treasurer that is filing the report.



Campaign Treasurer: James Bond

A screenshot of a web form showing a dropdown menu for 'Campaign Treasurer'. The name 'James Bond' is selected and displayed in the dropdown. A red arrow points to the dropdown arrow on the right side of the menu.

The treasurer enters his PIN and then clicks .



Report: 2010 - F3 - 26 Coverage Period: 8/7/2010-8/19/2010 Due: 8/20/2010

Review Status: Reviewed

Campaign Treasurer: James Bond

PIN for specified Treasurer:

To Edit Report Again Select Cancel:

A screenshot of a report filing interface. At the top, it shows report details: 'Report: 2010 - F3 - 26', 'Coverage Period: 8/7/2010-8/19/2010', and 'Due: 8/20/2010'. Below this, there are two dropdown menus: 'Review Status' set to 'Reviewed' and 'Campaign Treasurer' set to 'James Bond'. To the right of these are radio buttons for 'Original' (selected) and 'Amended', and a checkbox for 'Waiver'. Below the dropdowns is a text input field for 'PIN for specified Treasurer'. At the bottom, there is a red instruction: 'To Edit Report Again Select Cancel:' followed by two buttons: 'Cancel' and 'File Report'. A red arrow points to the 'File Report' button.

IMPORTANT NOTE: If changes need to be made after a chairperson PIN is entered, the treasurer must undo the chairperson PIN validation before the system will allow changes. See page 48 for instructions.



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Florida Department of State - Division of Elections

Florida Election System Reports

Candidate/Committee Lookup

Name:

Committee Name: St. Pete Chamber PAC

Account: 61119

Election:

Acct:

Type:

Date Due	Type	Date Filed	Status	Days Late	Fine Assessed	Appealed	Amount Fined	Amount Paid
10/7/2022	G3	10/3/2022						
10/7/2022	G3A	10/3/2022						
9/23/2022	G2A	10/3/2022	CLO	10	\$0.00		\$0.00	\$0.00
9/16/2022	G2	9/15/2022						
9/9/2022	G1A	9/15/2022	PEN	6	\$0.00		\$0.00	\$0.00
9/2/2022	G1		SNT	0	\$0.00		\$0.00	\$0.00
8/26/2022	P7A	8/29/2022	PEN	3	\$0.00		\$0.00	\$0.00
8/19/2022	P7	8/29/2022	CLO	10	\$0.00		\$0.00	\$0.00
8/12/2022	P8	8/11/2022						
8/5/2022	P5	8/4/2022						
7/29/2022	P4	8/4/2022	CLO	6	\$0.00		\$0.00	\$0.00
7/22/2022	P3	8/4/2022	CLO	13	\$0.00		\$0.00	\$0.00
7/15/2022	P2A	7/27/2022	CLO	12	\$0.00		\$0.00	\$0.00
7/8/2022	P2	7/8/2022						
7/1/2022	P1A	7/8/2022	CLO	7	\$0.00		\$0.00	\$0.00
6/24/2022	P1	6/23/2022						
6/10/2022	M6	6/1/2022						
5/10/2022	M4	5/2/2022						
4/11/2022	M3	4/11/2022						
3/10/2022	M2	3/1/2022						
2/10/2022	M1	2/10/2022						
1/10/2022	M12	1/3/2022						
12/10/2021	M11	12/1/2021						
11/10/2021	M10	11/1/2021						
10/12/2021	M9	10/10/2021						
9/10/2021	M8	9/1/2021						
8/10/2021	M7	8/2/2021						
7/12/2021	M6	7/12/2021						
6/10/2021	M5	6/1/2021						
5/10/2021	M4	5/10/2021						
4/12/2021	M3	4/2/2021						
3/10/2021	M2	3/3/2021						
2/10/2021	M1	2/1/2021						
1/11/2021	M12	1/6/2021						
12/10/2020	M11	12/1/2020						
11/10/2020	M10	11/2/2020						
10/30/2020	G6	10/30/2020						
10/29/2020	D6	10/29/2020						
10/28/2020	D5	10/28/2020						
10/27/2020	D4	10/28/2020	CLO	1	\$0.00		\$0.00	\$0.00
10/26/2020	D3	10/28/2020	CLO	2	\$0.00		\$0.00	\$0.00
10/25/2020	D2	10/28/2020	CLO	3	\$0.00		\$0.00	\$0.00
10/24/2020	D1	10/28/2020	CLO	2	\$0.00		\$0.00	\$0.00
10/23/2020	G5	10/19/2020						
10/16/2020	G4A	10/12/2020						
10/9/2020	G4	10/5/2020						
10/2/2020	G3A	9/28/2020						
9/25/2020	G3	9/21/2020						
9/18/2020	G2A	9/16/2020						
9/11/2020	G2	9/10/2020						
9/4/2020	G1A	8/31/2020						
8/28/2020	G1	8/27/2020						
8/21/2020	P7A	8/19/2020						
8/14/2020	P7	8/14/2020						
8/7/2020	P8	8/4/2020						
7/31/2020	P5	7/28/2020						
7/24/2020	P4	7/20/2020						

7/17/2020	P3	7/13/2020					
7/10/2020	P2A	7/8/2020					
7/3/2020	P2	6/29/2020					
6/26/2020	P1A	6/22/2020					
6/19/2020	P1	6/16/2020					
6/10/2020	M5	6/2/2020					
5/11/2020	M4	5/11/2020					
4/10/2020	M3	4/10/2020					
3/10/2020	M2	3/2/2020					
2/10/2020	M1	2/6/2020					
1/10/2020	M12	1/10/2020					
12/10/2019	M11	12/10/2019					
11/12/2019	M10	11/1/2019					
10/10/2019	M9	10/10/2019	CLO	0	\$200.00	\$200.00	\$200.00
9/10/2019	M8	9/5/2019					
8/12/2019	M7	8/5/2019					
7/10/2019	M6	7/10/2019					
7/10/2019	SG3	10/30/2020	CLO	478	\$0.00	\$0.00	\$0.00
6/14/2019	SG2	10/30/2020	CLO	504	\$0.00	\$0.00	\$0.00
6/10/2019	M5	6/4/2019					
5/16/2019	SG1	10/30/2020	CLO	533	\$0.00	\$0.00	\$0.00
5/10/2019	M4	5/9/2019					
4/10/2019	M3	4/2/2019					
4/5/2019	SP2	10/30/2020	CLO	574	\$0.00	\$0.00	\$0.00
3/11/2019	SP1	10/30/2020	CLO	599	\$0.00	\$0.00	\$0.00
3/11/2019	M2	3/14/2019	FOI	3	\$0.00	\$0.00	\$0.00
2/11/2019	M1	2/11/2019					
1/10/2019	M12	1/10/2019					
12/10/2018	M11	12/4/2018					
11/2/2018	G7	11/5/2018	CLO	3	\$0.00	\$0.00	\$0.00
11/1/2018	D6	11/5/2018	FOI	4	\$0.00	\$0.00	\$0.00
10/31/2018	D5	10/31/2018					
10/30/2018	D4	10/30/2018					
10/29/2018	D3	10/29/2018					
10/28/2018	D2	10/29/2018	FOI	1	\$0.00	\$0.00	\$0.00
10/27/2018	D1	10/26/2018					
10/26/2018	G6	10/26/2018					
10/25/2018	G4	10/13/2018					
10/19/2018	G5	10/19/2018					
10/5/2018	G3	10/5/2018					
9/28/2018	G2A	9/27/2018					
9/21/2018	G2	9/22/2018	FOI	1	\$0.00	\$0.00	\$0.00
9/14/2018	G1A	9/13/2018					
9/7/2018	G1	9/4/2018					
8/31/2018	P7A	8/27/2018					
8/24/2018	P7	8/27/2018	FOI	3	\$0.00	\$0.00	\$0.00
8/17/2018	P6	8/27/2018	FOI	10	\$0.00	\$0.00	\$0.00
8/10/2018	P5	8/27/2018	FOI	17	\$0.00	\$0.00	\$0.00
8/3/2018	P4	8/27/2018	FOI	24	\$0.00	\$0.00	\$0.00
7/27/2018	P3	8/27/2018	FOI	31	\$0.00	\$0.00	\$0.00
7/20/2018	P2A	8/27/2018	FOI	38	\$0.00	\$0.00	\$0.00
7/13/2018	P2	7/10/2018					
7/6/2018	P1A	7/10/2018	FOI	4	\$0.00	\$0.00	\$0.00
6/29/2018	P1	7/10/2018	FOI	11	\$0.00	\$0.00	\$0.00
6/11/2018	M5	6/14/2018	FOI	3	\$0.00	\$0.00	\$0.00
5/10/2018	M4	5/4/2018					
4/10/2018	M3	4/4/2018					
3/12/2018	M2	3/10/2018					
2/16/2018	SP2	1/3/2019	FOI	321	\$0.00	\$0.00	\$0.00
2/12/2018	M1	2/9/2018					
1/10/2018	M12	1/11/2018	FOI	1	\$0.00	\$0.00	\$0.00
12/11/2017	M11	12/5/2017					
11/13/2017	M10	11/13/2017					
10/10/2017	M9	10/6/2017					
9/22/2017	M8	9/8/2017					
8/10/2017	M7	8/8/2017					
7/10/2017	M6	7/6/2017					

6/12/2017	M5	6/6/2017					
5/10/2017	M4	5/3/2017					
4/10/2017	M3	4/4/2017					
3/11/2017	M2	3/6/2017					
2/10/2017	M1	2/2/2017					
1/10/2017	M12	1/3/2017					
12/12/2016	M11	11/30/2016					
11/4/2016	D6	11/3/2016					
11/4/2016	G7	11/3/2016					
11/2/2016	D5	11/1/2016					
11/1/2016	D4	11/1/2016					
10/31/2016	D3	10/31/2016					
10/30/2016	D2	10/31/2016	CLO	1	\$0.00	\$0.00	\$0.00
10/29/2016	D1	10/28/2016					
10/28/2016	G6	10/26/2016					
10/21/2016	G5	10/17/2016					
10/14/2016	G4	10/13/2016					
10/7/2016	G3	10/3/2016					
9/30/2016	G2A	9/26/2016					
9/23/2016	G2	9/23/2016					
9/16/2016	G1A	9/16/2016					
9/9/2016	G1	9/7/2016					
9/2/2016	P7A	8/31/2016					
8/26/2016	P7	8/25/2016					
8/19/2016	P6	8/19/2016					
8/12/2016	P5	8/11/2016					
8/5/2016	P4	8/5/2016					
7/29/2016	P3	7/29/2016					
7/22/2016	P2A	7/21/2016					
7/15/2016	P2	7/15/2016					
7/8/2016	P1A	7/1/2016					
7/1/2016	P1	7/1/2016					
6/10/2016	M5	6/2/2016					
5/10/2016	M4	5/4/2016					
4/11/2016	M3	4/11/2016					
3/10/2016	M2	3/3/2016					
2/10/2016	M1	2/1/2016					
1/11/2016	M12	1/11/2016					
12/10/2015	M11	12/4/2015					
11/10/2015	M10	11/2/2015					
10/13/2015	M9	10/5/2015					
9/10/2015	M8	9/2/2015					
8/10/2015	M7	8/3/2015					
7/10/2015	M6	7/7/2015					
6/10/2015	M5	6/3/2015					
5/11/2015	M4	5/8/2015					
4/10/2015	M3	4/6/2015					
3/10/2015	M2	3/6/2015					
2/10/2015	M1	2/9/2015					
1/12/2015	M12	1/9/2015					
12/10/2014	M11	12/4/2014					
11/10/2014	M10	11/1/2014					
10/31/2014	G7	11/1/2014	CLO	1	\$0.00	\$0.00	\$0.00
10/30/2014	D6	10/30/2014					
10/29/2014	D5	10/29/2014					
10/28/2014	D4	10/28/2014					
10/27/2014	D3	10/27/2014					
10/26/2014	D2	10/26/2014					
10/25/2014	D1	10/24/2014					
10/24/2014	G6	10/23/2014					
10/17/2014	G5	10/14/2014					
10/10/2014	G4	10/7/2014					
10/3/2014	G3	9/30/2014					
9/26/2014	G2A	9/26/2014					
9/19/2014	G2	9/19/2014					
9/12/2014	G1A	9/11/2014					
9/5/2014	G1	9/5/2014					

8/29/2014	P7A	8/28/2014
8/22/2014	P7	8/21/2014
8/15/2014	P6	8/14/2014
8/8/2014	P5	8/6/2014
8/1/2014	P4	7/29/2014
7/25/2014	P3	7/23/2014
7/18/2014	P2A	7/15/2014
7/11/2014	P2	7/7/2014
7/4/2014	P1A	7/1/2014
6/27/2014	P1	6/27/2014
6/10/2014	M5	6/9/2014
5/12/2014	M4	5/7/2014
4/10/2014	M3	4/9/2014
3/10/2014	M2	3/6/2014
2/10/2014	M1	2/10/2014
1/10/2014	M12	1/9/2014
12/10/2013	M11	12/9/2013
11/12/2013	M10	11/12/2013



ST. PETERSBURG
CHAMBER *of* COMMERCE

RECEIVED

2018 OCT 30 PM 3:40

DIVISION OF ELECTIONS
TALLAHASSEE, FL

The Chamber Building
100 Second Ave N, Suite 150
St. Petersburg, FL 33701
(727) 821-4069
stpete.com

October 26, 2018

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

Dear Sir or Madame,

This letter is to advise you that Phil Clark is no longer the Chair of the St. Pete Chamber PAC. Mr. Clark has been replaced by Laura Boehmer, whose contact information is:

Laura Boehmer
c/o St. Petersburg Chamber of Commerce
100 2nd Ave N, Suite 150
St. Petersburg, FL 33701
727-821-4069

Please make the appropriate updates to our file.

Thank you for your attention to this matter.

Sincerely,

Chris Steinocher
Deputy Treasurer, St. Pete Chamber PAC

The St. Petersburg Area Chamber of Commerce shall be the preeminent leader of business
in order to ensure the economic growth and vitality of our community.



FLORIDA DEPARTMENT OF STATE

RICK SCOTT
Governor

KEN DETZNER
Secretary of State

November 1, 2018

Laura Boehmer, Chairperson
St. Pete Chamber PAC (61119)
100 2nd Avenue North
Suite 150
St. Petersburg, Florida 33701

Dear Ms. Boehmer:

Your appointment as chairperson for **St. Pete Chamber PAC** was filed in this office on October 30, 2018. Enclosed is a security envelope containing your confidential password and pin number to access the Division's Electronic Filing System (EFS). You will need to advise the treasurer and any deputy treasurer(s) of the new password in order for them to have access to the EFS.

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

If you have questions concerning your campaign account or the EFS, you may call (850) 245-6280.

Sincerely,

Kristi Reid Willis, Chief
Bureau of Election Records

KRW/jcs

Enclosures

pc: Amy St. Hart, Treasurer

Division of Elections

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

Exhibit 8 Page 2 of 2



Re: Florida Elections Commission 22-286**Christie Bruner <cbruner@stpete.com>**

Fri 10/14/2022 12:53 PM

To: Courtney Harrold <Courtney.Harrold@myfloridalegal.com>

Hello Ms. Harrold,

I am following up on this request to our former Chairperson, Laura Boehmer. I am new to my role with the St. Pete Chamber and would like to resolve this situation. My name is not yet on the account. Due to inactivity, we may be interested in disbanding the PAC and are looking into that option. Please contact me via email or phone. Thank you in advance.

-Christie Bruner
stpete.com
**Christie Bruner**

Vice President of Advocacy

St. Petersburg Area Chamber of Commerce

Innovation. Excellence. Inclusivity. Accountability. Integrity.

The Chamber Building

100 Second Avenue North, Suite 150

St. Petersburg, FL 33701

C: 727.637.7913

From: Laura Boehmer <boehmer@thesouthernmg.com>**Date: Friday, October 14, 2022 at 12:40 PM****To: Christie Bruner <cbruner@stpete.com>****Subject: Fwd: Florida Elections Commission 22-286**

Laura Boehmer

The Southern Group

T: [813.563.4100](tel:813.563.4100)C: [727.686.0924](tel:727.686.0924)

Begin forwarded message:

**FLORIDA ELECTIONS COMMISSION
PHONE LOG
Case No.: FEC 22-286**

Respondent: St. Pete Chamber PAC

Complainant: Division of Elections

1. **Date and time:** 10/12/22 @ 11:24am
Name: Laura Boehmer
Phone #: 727-821-4069
Summary: I attempted to reach Resp using phone number provided in qualifying docs and letters via DOE website. The phone number reached the St. Pete Chamber of Commerce. There was only an automated system, without an attendant or operator. I attempted to reach Respondent by entering the first 3 letters of her last name into the directory. I received an automated message that there was no one that matched my selection. The call was then disconnected.
Entered by: CHS
2. **Date and time:** 10/13/22 @ 11:04am
Name: Laura Boehmer
Phone #: 727-686-0924
Summary: I contacted Resp via her cell number and left a detailed vm, requesting a call-back. I explained that I only had questions about 4 late-filed waivers and stated that, due to her status as the chair, I had to ask her a few basic questions. I reiterated that I only needed about 5-10 minutes of her time.
Entered by: CHS
3. **Date and time:** 10/13/22 @ 12:41pm
Name: Laura Boehmer (chair)
Phone #: 727-686-0924
Summary: I received a return-call from Laura Boehmer (pronounced Bee-mer). She explained that she had no idea that she was listed as the PAC's chair; she has nothing to do with filing campaign treasurer reports (or waivers). Sometime in 2020, Matt Lettellier (treasurer) wanted Respondent to sign something; she refused. She believed she was done with the PAC, especially as she has never signed anything or filled-out any qualifying documents. Further details from the interview are below (**see memo**).
Entered by: CHS
4. **Date and time:**
Name:
Phone #:
Summary:
Entered by:

RESPONDENT INTERVIEW MEMO – Call details at #[727-686-0924]

- Have you ever run for public office? If so, please name each office you ran for and state what year each election occurred.
 -
- Have you ever 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.
 - 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 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?
 -
- 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
- Do you recall receiving any other materials from your filing officer?
 - No
 - Respondent explained she has never been involved in the PAC, save for allowing herself to be listed as the chair in 2018 or 2019.
- Why were you unable to timely file the following reports: 2022 P1A, 2022 P2A, 2022 P3, and 2022 P4?
 - Respondent was not able to provide an answer, as she is not involved in any administrative or financial issues to do with the PAC.
- If you did not file the campaign treasurer reports and/or waivers, who did? The campaign treasurer?
 - Respondent was not able to answer the question, as she is not involved in any administrative or financial issues to do with the PAC.
- What role did you have in filing the reports?
 - None
- When did you first become aware that these reports and/or waivers were not timely filed?
 - Respondent was never aware about any problems regarding campaign reports and/or waivers.

FLORIDA ELECTIONS COMMISSION
PHONE LOG
Case No.: FEC 22-286

Respondent: St. Pete Chamber PAC

Complainant: Division of Elections

1. **Date and time:** 10/12/22 @ 11:24am
Name: Laura Boehmer
Phone #: 727-821-4069
Summary: I attempted to reach Resp using phone number provided in qualifying docs and letters via DOE website. The phone number reached the St. Pete Chamber of Commerce. There was only an automated system, without an attendant or operator. I attempted to reach Respondent by entering the first 3 letters of her last name into the directory. I received an automated message that there was no one that matched my selection. The call was then disconnected.
Entered by: CHS
2. **Date and time:** 10/13/22 @ 11:04am
Name: Laura Boehmer
Phone #: 727-686-0924
Summary: I contacted Resp via her cell number and left a detailed vm, requesting a call-back. I explained that I only had questions about 4 late-filed waivers and stated that, due to her status as the chair, I had to ask her a few basic questions. I reiterated that I only needed about 5-10 minutes of her time.
Entered by: CHS
3. **Date and time:** 10/13/22 @ 12:41pm
Name: Laura Boehmer (chair)
Phone #: 727-686-0924
Summary: I received a return-call from Laura Boehmer (pronounced Bee-mer). She explained that she had no idea that she was listed as the PAC's chair; she has nothing to do with filing campaign treasurer reports (or waivers). Sometime in 2020, Matt Lettellier (treasurer) wanted Respondent to sign something; she refused. She believed she was done with the PAC, especially as she has never signed anything or filled-out any qualifying documents. Further details from the interview are below (**see memo**).
Entered by: CHS
4. **Date and time:**
Name:
Phone #:
Summary:
Entered by:

RESPONDENT INTERVIEW MEMO – Call details at #[727-686-0924]

- Have you ever run for public office? If so, please name each office you ran for and state what year each election occurred.
 -
- Have you ever 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.
 - **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 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?
 -
- 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**
- Do you recall receiving any other materials from your filing officer?
 - **No**
 - **Respondent explained she has never been involved in the PAC, save for allowing herself to be listed as the chair in 2018 or 2019.**
- Why were you unable to timely file the following reports: **2022 P1A, 2022 P2A, 2022 P3, and 2022 P4?**
 - **Respondent was not able to provide an answer, as she is not involved in any administrative or financial issues to do with the PAC.**
- If you did not file the campaign treasurer reports and/or waivers, who did? The campaign treasurer?
 - **Respondent was not able to answer the question, as she is not involved in any administrative or financial issues to do with the PAC.**
- What role did you have in filing the reports?
 - **None**
- When did you first become aware that these reports and/or waivers were not timely filed?
 - **Respondent was never aware about any problems regarding campaign reports and/or waivers.**



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



October 10, 2022

Laura Boehmer, Chair
St. Pete Chamber PAC
100 2nd Avenue North, #150
St. Petersburg, FL 33701

RE: Case No.: FEC 22-286; Respondent: St. Pete Chamber PAC

Dear Ms. Boehmer:

On September 7, 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 violation:

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:

- 2022 P1A
- 2022 P2A
- 2022 P3
- 2022 P4

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, 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 violation occurred and, if so, the amount of the fine to be imposed upon your committee. Notice will be mailed to you and 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.

Laura Boehmer, Chair
October 10, 2022
Page 2
FEC 22-286

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 **Courtenay Harrold Sheppard**, the investigator assigned to this case, by phone at (850) 922-4539 or by email at **Courtenay.Harrold@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/jd

**DIVISION OF ELECTIONS
FEC NOTICE FORM**

To FEC from Division of Elections

Name: St. Pete Chamber PAC
Account Number: 61119
Chairperson: Laura Boehmer
Treasurer: Matthew Lettelleir
Registered Agent: Travis Norton

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

2022 P1A
2022 P2A
2022 P3
2022 P4

- St. Pete Chamber PAC (61119) is a political committee registered with the Division of Elections. On October 10, 2013, the committee filed the DSDE 5 and DSDE 6 with the Division appointing Jeff Rogo as the chairperson and Anne McMullen as the treasurer for the committee.
- On October 30, 2018, the committee appointed Laura Boehmer as the chairperson.
- On September 13, 2019, the committee appointed Matthew Lettelleir as the treasurer.
- The 2022 P1A campaign treasurer's report was due on July 1, 2022. St. Pete Chamber PAC failed to notify the Division that no report was being filed on the prescribed reporting date. On July 8, 2022, the committee filed a notification of no activity. (See attached file receipt.)

REC'D: FL ELECTIONS COM
7 SEP '22 PM 3:26

- The 2022 P2A campaign treasurer's report was due on July 15, 2022. St. Pete Chamber PAC failed to notify the Division that no report was being filed on the prescribed reporting date. On July 27, 2022, the committee filed a notification of no activity. (See attached file receipt.)
- The 2022 P3 campaign treasurer's report was due on July 22, 2022. St. Pete Chamber PAC failed to notify the Division that no report was being filed on the prescribed reporting date. On August 4, 2022, the committee filed a notification of no activity. (See attached file receipt.)
- The 2022 P4 campaign treasurer's report was due on July 29, 2022. St. Pete Chamber PAC failed to notify the Division that no report was being filed on the prescribed reporting date. On August 4, 2022, the committee filed a notification of no activity. (See attached file receipt and letter.)

Sent By: Donna S. Brown *DSB*
Date: September 2, 2022

bct

 **Treasurer Report Status**

ID: **61119** Name: **St. Pete Chamber PAC**

Report: 2022 - P1A - 195

Print Date: **8/18/2022 9:02:56 AM**

Election: 2022 General Election

Covers: 6/18/2022-6/24/2022

Amended Waiver

Due: 7/1/2022

Filed: **7/8/2022 4:18:45 PM**

File Status: **Filed Report**

Reviewed: **7/8/2022**

Review Status: **Reviewed**

Detail Complete: **No Detail Records Found**

File Method: Web Filed

Number of Detail Records

Entry Method: Web Data Entry

Contributions: 0

Expenditures: 0

Pending Queued Items: **0**

Fund Transfers: 0

Distributions: 0

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



Treasurer Report Status

ID: **61119** Name: **St. Pete Chamber PAC**

Report: 2022 - P2A - 197

Print Date: **8/18/2022 9:02:27 AM**

Election: 2022 General Election

Covers: 7/2/2022-7/8/2022

Amended Waiver

Due: 7/15/2022

Filed: **7/27/2022 8:31:27 AM**

File Status: **Filed Report**

Reviewed: **7/27/2022**

Review Status: **Reviewed**

Detail Complete: **No Detail Records Found**

File Method: Web Filed

Number of Detail Records

Entry Method: Web Data Entry

Contributions: 0

Expenditures: 0

Pending Queued Items: **0**

Fund Transfers: 0

Distributions: 0

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

 **Treasurer Report Status**

ID: **61119** Name: **St. Pete Chamber PAC**

Report: 2022 - P3 - 198

Print Date: **8/18/2022 9:02:13 AM**

Election: 2022 General Election

Covers: 7/9/2022-7/15/2022

Amended Waiver

Due: 7/22/2022

Filed: **8/4/2022 1:41:53 PM**

File Status: **Filed Report**

Reviewed: **8/4/2022**

Review Status: **Reviewed**

Detail Complete: **No Detail Records Found**

File Method: Web Filed

Number of Detail Records

Entry Method: Web Data Entry

Contributions: 0

Expenditures: 0

Pending Queued Items: **0**

Fund Transfers: 0

Distributions: 0

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



Treasurer Report Status

ID: **61119** Name: **St. Pete Chamber PAC**

Report: 2022 - P4 - 199

Print Date: **8/18/2022 9:02:42 AM**

Election: 2022 General Election

Covers: 7/16/2022-7/22/2022

Amended Waiver

Due: 7/29/2022

Filed: **8/4/2022 2:14:50 PM**

File Status: **Filed Report**

Reviewed: **8/4/2022**

Review Status: **Reviewed**

Detail Complete: **No Detail Records Found**

File Method: Web Filed

Number of Detail Records

Entry Method: Web Data Entry

Contributions: 0

Expenditures: 0

Pending Queued Items: **0**

Fund Transfers: 0

Distributions: 0

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



FLORIDA DEPARTMENT OF STATE

Cord Byrd
Secretary of State

DIVISION OF ELECTIONS

August 9, 2022

Matthew Lettelleir, Treasurer
St. Pete Chamber PAC
100 2nd Avenue North #150
St. Petersburg, FL 33701-3701

PAC 61119

Dear Lettelleir:

The notification that you had no reportable activity for the report deadline of July 29, 2022, was not filed until August 4, 2022. Although the notification is late, no automatic fine is assessed because you had no receipts or expenditures during this reporting period.

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

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

Sincerely,

Donna S. Brown, Chief
Bureau of Election Records

cc: Laura Boehmer, Chairperson