STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION

In Re: Jason Edward Bloch **Case No.: FEC 23-133**

/

TO: (address exempt per Ch. 119, F.S.)

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

NOTICE OF HEARING (AUTOMATIC FINE (AF))

A hearing will be held in this case before the Florida Elections Commission on **February 7, 2024 at 9:00 a.m.,** *or as soon thereafter as the parties can be heard*, at the following location: **402 South Monroe Street, 12 HOB, Tallahassee, Florida 32399.** Due to heightened security access requirements, please bring only essential items into the building and plan to arrive early to allow for delays coming through security.

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

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

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

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

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

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

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

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

See further instructions on the reverse side.

Tim Vaccaro
Executive Director
Florida Elections Commission
January 19, 2024

NOH
FEC # 23-133

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 to 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.

RE: FEC 23-133: Automatic Fine Hearing - Appeal Letter and attachments

Jason Bloch <jebloch@att.net>

Wed 1/24/2024 1:54 PM

To:Florida Elections Commission <fec@myfloridalegal.com>
Cc:Mattie Clay <Mattie.Clay@myfloridalegal.com>

3 attachments (4 MB)

Appeal Letter to FEC (1-24-24).pdf; Screenshot Illustration 1.pdf; Screenshot Illustration 2.pdf;

Good afternoon. Attached please find my letter and attachments in connection with the appeal in the above case, which is scheduled for hearing before the FEC on February 7.

Please advise if you need anything else from me and if there is anything else you think I should be aware of.

Once again, thank you tremendously for your assistance and service.

Warm regards…Jason Bloch
786-208-9802

From: Mattie Clay <Mattie.Clay@myfloridalegal.com>
Sent: Wednesday, January 24, 2024 8:52 AM
To: Jason Bloch <jebloch@att.net>
Subject: Re: FEC 23-133: Automatic Fine Hearing - request for continuance

Good morning, Jason,

Yes, this is what the Commission needs to evaluate your case. You may send the letter and screenshots to our Agency Clerk (fec@myfloridalegal.com) while cc-ing me, or you're welcome to send me the version you want for distribution. We will ensure the materials are uploaded to the thumbdrives by c/o/b today, which will mail out tomorrow. Please note that Automatic Fine cases are public, so the materials will also be posted on our website under "Meeting & Agenda Information" of the Meetings tab.

Please feel free to call if you have any other questions or concerns. My direct is 850-404-5612.

Mattie T. Clay

Assistant General Counsel

Florida Elections Commission

107 West Gaines Street

The Collins Building, Suite 224

Tallahassee, Florida 32399-6596

Main: (850) 922-4539

Facsimile: (850) 921-0783

mattie.clay@myfloridalegal.com

From: Jason Bloch <jebloch@att.net>
Sent: Tuesday, January 23, 2024 11:23 PM
To: Mattie Clay <Mattie.Clay@myfloridalegal.com>
Subject: RE: FEC 23-133: Automatic Fine Hearing - request for continuance

Hi Mattie – nice chatting with you earlier today. As discussed, attached is my draft letter to the FEC for my appeal, along with some example screen shots. I look forward to hearing from you with additional instructions or feedback you may have. Thanks again for your cooperation and assistance.

Warm regards…Jason Bloch

786-208-9802

From: Mattie Clay <Mattie.Clay@myfloridalegal.com>
Sent: Wednesday, November 8, 2023 4:57 PM
To: jebloch@att.net
Subject: Re: FEC 23-133: Automatic Fine Hearing - request for continuance

No worries at all, and never a bother. I'll be in touch next week with updates, but please feel free to reach out at any time if you need anything.

Mattie T. Clay

Assistant General Counsel

Florida Elections Commission

107 West Gaines Street

The Collins Building, Suite 224

Tallahassee, Florida 32399-6596

Main: (850) 922-4539

Facsimile: (850) 921-0783

mattie.clay@myfloridalegal.com

From: jebloch@att.net <jebloch@att.net>
Sent: Wednesday, November 8, 2023 4:45 PM

To: Mattie Clay <Mattie.Clay@myfloridalegal.com>
Subject: RE: FEC 23-133: Automatic Fine Hearing - request for continuance

Thank you! I know you are very busy this week, so sorry for the bother. Hope you have a great week too.

Jason Bloch

From: Mattie Clay <Mattie.Clay@myfloridalegal.com>
Sent: Wednesday, November 8, 2023 4:41 PM
To: jebloch@att.net
Subject: Re: FEC 23-133: Automatic Fine Hearing - request for continuance

Good afternoon,

Thank you, your email was what we needed to continue your case to the February meeting. We will await your supplemental materials, and I will confirm receipt once I see them come through.

I hope you have a good evening and remainder of the week.

Mattie T. Clay

Assistant General Counsel

Florida Elections Commission

107 West Gaines Street

The Collins Building, Suite 224

Tallahassee, Florida 32399-6596

Main: (850) 922-4539

Facsimile: (850) 921-0783

mattie.clay@myfloridalegal.com

From: jebloch@att.net <jebloch@att.net>
Sent: Wednesday, November 8, 2023 4:26 PM
To: Mattie Clay <Mattie.Clay@myfloridalegal.com>
Cc: ec@myfloridalegal.com <ec@myfloridalegal.com>
Subject: RE: FEC 23-133: Automatic Fine Hearing - request for continuance

Good afternoon. I just wanted to make sure you saw my request below for a continuance from the November commission meeting, given the relatively short notice and my desire to prepare a response. Kindly confirm receipt and please let me if you need anything else.

Thanks again,

Jason Bloch

786-208-9802

From: jebloch@att.net <jebloch@att.net>
Sent: Friday, November 3, 2023 5:10 PM
To: 'Mattie Clay' <Mattie.Clay@myfloridalegal.com>
Subject: RE: FEC 23-133: Automatic Fine Hearing

Ms. Clay – thank you very much for taking my call and for so kindly and patiently explaining the process and other details to me on the phone. I will begin to prepare materials for the Commission that I hope will show why no fines should be imposed in this case.

Given the time considerations, however, having just learned of the hearing today, I would like to request a continuance to allow me to do that and to make plans to attend the hearing in person if at all possible. Please let me know if this email is sufficient for the continuance request or if other steps are needed.

Thank you again for your professionalism and courtesy. I look forward to working with you, and hopefully toward a mutually agreeable resolution.

Warm regards…Jason Bloch

786-208-9802

P.S. Thank you also for the honor of the greeting, but please, call me Jason. (And just to reiterate I am a former judge - now doing bono law as a lawyer.)

From: Mattie Clay <Mattie.Clay@myfloridalegal.com>
Sent: Friday, November 3, 2023 4:42 PM
To: jebloch@att.net
Subject: FEC 23-133: Automatic Fine Hearing

Good afternoon, Judge Bloch,

Thank you for your call this afternoon. As a brief summary, we will accept supplemental information for the Commissioners' consideration at the Automatic Fine hearing, including a statement of your circumstances and any mitigating factors. We will provide print copies as well as electronic copies for the Commission. You may send materials either to me at this email address or to our Agency Clerk, Donna Malphurs, at fec@myfloridalegal.com.

If you wish to request a continuance, we will accept either an email or a formal motion outlining the reasons for your request. I will not object to the continuance. The next hearing will likely be held during the second week of February. We will know closer to February whether the hearing will occur virtually or in Tallahassee. Attendance is not required but strongly encouraged.

Please do not hesitate to contact our office if you have any other questions or concerns leading up to the hearing.

Thank you,

Mattie T. Clay

Assistant General Counsel

Florida Elections Commission

107 West Gaines Street

The Collins Building, Suite 224

Tallahassee, Florida 32399-6596

Main: (850) 922-4539

Facsimile: (850) 921-0783

mattie.clay@myfloridalegal.com

January 24, 2024

Florida Elections Commission
Division of Elections
500 S. Bronough St., Room 3016
Tallahassee, FL 32399

Via email to FEC Agency Clerk: fec@myfloridalegal.com

Re: Case No.: FEC 23-133 (Jason Edward Bloch); Appeal

Dear Members of The Florida Elections Commission,

Thank you for the opportunity to explain why unusual circumstances exist and/or that an amended report was timely filed and thus no violations should be found, nor fines imposed in this case.

If I may begin by providing some context. I have had the privilege to be a lawyer in Florida for nearly 30 years. I became a lawyer because, though not perfect, I believe that law is a noble profession with the capacity to help people and to further justice. To that end, I spent my entire career in public service, beginning as an Assistant County Attorney in the Miami-Dade County Attorney's Office where I served for twenty years. In 2014, I was nominated from among over thirty candidates and then appointed to be a Circuit Judge by then Governor Scott.

Since leaving the bench I have continued in public service, practicing exclusively *pro bono* (without charge), representing people who could not otherwise afford a lawyer as well as nonprofit organizations. I received several recognitions for my *pro bono* work, most recently the Access to Justice Pro-Bono Award and 2022 Child Advocacy Award, both from Legal Aid. I have also volunteered on non-profit boards and on public committees and panels, including Legal Services of Greater Miami, the SEED School (a nonprofit residential charter school serving at-risk students), Miami's Civilian Investigative Panel (investigating allegations of police misconduct), and others.

I would also like to stress that there is nothing more important to me than my reputation and it is always my intent to comply with all laws, rules, and ethical standards. To my knowledge, there has never been a complaint about me to the Florida Bar, either as a lawyer or a judge.

Returning to this case, before the 2020 election friends and colleagues persuaded me to return the bench, this time by running for the office. However, I decided that my campaign would neither seek nor accept contributions from any outside source. Instead, it would be entirely self-funded and thus further assure stakeholders of my independence and impartiality as a judge. And so, my campaign had one and only one contributor: me.

This is significant since the misunderstanding which underlies the instant alleged violation – a single overlooked contribution which was corrected via an amended report – involves no concealment or misrepresentation about the source of contributions: all contributions came from me. Nor is there a concern about how or where the funds were spent. All expenditures were disclosed. And so, the aim and spirit of election finance rules – to provide transparency into campaign finances – was not undermined or even affected in this case. From the beginning, and until the end, it was always clear that I was the only contributor to my campaign.

Instead, in my case, the mistake was inadvertently failing to record one contribution during its correct reporting period. This was my mistake and I take full responsibility. But the oversight was fully corrected by amendment, as is routinely done by many campaigns. Indeed, the overall campaign finance process not only contemplates amendments, but the online filing portal specifically facilitates them. elections staff also encourage campaigns to file amendments when necessary and also help facilitate the process.

Importantly, my understanding from elections staff was that the amendment process provides safe harbor. So long as reports are ultimately amended to reflect correct contributions and/or expenditures – as was done in my case – any initial errors or omissions ***are not considered violations***. For example, if a $1,000, contribution was incorrectly reported as $10.00, whether due to input error, miscommunication, or some other reason, that error can be later corrected, without penalty, by amendment.

This process is both sensical and fair. The goal of the election reporting regime is to ensure full disclosure and transparency, not to punish campaigns that have made inadvertent bookkeeping errors or that have not quite mastered the

(sometimes difficult to navigate) filing portal. Allowing amendments merely recognizes the realities of hectic day-to-day operations of campaigns and the existence of good faith errors inherent in any human endeavor, while ensuring an avenue for transparency.

Indeed, my campaign itself filed other amended reports when good faith discrepancies were discovered. In those cases, elections staff advised me that such amended reports meant that the campaign was in good standing with no violations or other concerns requiring attention.

Thus, when I received the notice of fine in this case I was profoundly confused and so I called the elections department. The staff member I spoke to was just as perplexed. Seeing my amendment, he too could not understand why there was an issue. We both concluded the notice was a mistake. Only later, after he did some investigation, was he able understand what triggered the notice and explain it to me. The problem, it seems, was that because my initial report was a "waiver" report, i.e., one with no other activity, it was not considered a "report." And thus, for purposes a subsequent amendment to it does not receive the same safe harbor. Even after explaining it to me he agreed that this result seemed anomalous and inconsistent, if not difficult to defend. And, as shown in the attached screenshots from the elections portal, "waivers" are themselves described at every stage of the filing process as "reports." And there is nothing to suggest that they are treated differently than other reports.

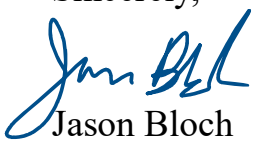
To illustrate: suppose a candidate reported a single contribution of one dollar ($1) during the reporting period. If the campaign later realized the omission of other reportable activity during the period, or to continue with the example, if the amount were wrong, say $10,000, instead of $1, the discrepancies can be corrected by filing an amended report. In that case there are no deemed violations. But on the other hand, suppose a candidate reported $0 (zero dollars) in contributions, and so filed a "waiver" report. Upon discovering the error and filing an amended report to reflect the accurate amount of $10,000, that would be considered a violation, or I should say *could* be a violation, since Filing Officers apparently sometimes do, but sometimes don't, impose this result. Starkly differing results for nearly identical situations are not only anomalous and inconsistent but are also unfair. This is

especially so for candidates like me who relied on elections staff for their understanding the use and implications of amendments.[1]

Moreover, this different treatment creates distorted incentives. We want campaigns to do the right thing and amend incomplete or inaccurate reports to achieve transparency. By penalizing campaigns for full, albeit delayed, disclosure, some may instead choose to weigh the cost, particularly where there is little chance that the accurate numbers would otherwise come to light. I am not suggesting that there is ever a reason not to fully comply but why build incentives to encourage noncompliance? Finally, the $1 contribution example discussed above is not merely hypothetical. The same staff member shared with me that some campaigns will do exactly that -- make and report a token nominal self-contribution even in reporting periods with no reportable activity -- for the very purpose of protecting against the risk found here. Again, encouraging such contrived activity does nothing to further the goals of disclosure and transparency while at the same time disadvantages campaigns not aware of the technique. Unfortunately, I was in the latter camp.

Knowing the work of this body which vigilantly watches over the integrity of Florida elections and at the same time demonstrates fairness and reason, I humbly and respectfully request that you employ your authority and discretion to find unusual circumstances exist in this case. Thank you again for the opportunity to address you, and for your service.

Sincerely,



Jason Bloch

CC: Asst. General Counsel Mattie Clay

[1] I want to stress that in no way am I suggesting that any staff person did anything improper, nor am I making any negative commentary about them at all. On the contrary, in all my interactions with Elections staff, from the person who answers the phone to the Assistant General Counsel and everyone in between, each has been unfailingly polite, professional, patient, and helpful. They represent the highest standard for public employees that every agency should strive for, and I am grateful for their assistance.

Florida Department of State
Division of Elections
Online Reporting System

Signed On As: 83882

Filed Report Receipt

**** Report has been Filed ****

ID: **83882** Name: **Jason Edward Bloch**

Report: 2023 - M3 - 1

Print Date: **4/18/2023 11:39:17 AM**

Election: 2024 General Election

Covers: 3/27/2023-3/31/2023

Due: 4/10/2023

☐ **Amended** ☑ **Waiver**

Filed: **4/18/2023 11:39:17 AM**

File Status: **Submitted Report for Filing**

Reviewed:

Review Status: **Not Reviewed**

Detail Complete: **No Detail Records Found**

File Method: Web Filed

Entry Method: Web Data Entry

Pending Queued Items: **0**

Number of Detail Records

Contributions:	0
Expenditures:	0
Fund Transfers:	0
Distributions:	0

To Print: Right Click Mouse and Select 'Print'

Go to Filed Report List

Jason Edward Bloch(83882-STA) Circuit Judge

Out Help

NOTE: A PIN is the same as your signature attesting under oath to the validity of the report. (s. 106.0705, FS)

Step 1: Select the treasurer who will submit the report and enter their PIN.

Step 2: Select the 'File Report' button.

Report: 2023 - M3 - 1 Coverage Period: 3/27/2023-3/31/2023 Due: 4/10/2023

Review Status: Not Reviewed

Original Amended

Campaign Treasurer: Jason Bloch

Waiver

PIN for specified Treasurer:

To Edit Report Again Select Cancel: Cancel File Report

Note: The following conditions have been found in this report.
It is recommended that they be corrected before filing the report.

- Recent edits to this report have resulted in an incomplete Review.

STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION

In Re: Jason Edward Bloch **Case No.: FEC 23-133**

_____/

ORDER CONTINUING CASE

THIS MATTER was heard by the Florida Elections Commission ("Commission") at its regularly scheduled meeting on November 14, 2023, in Tallahassee, Florida.

Respondent requested a continuance as he was unable to attend the hearing but wished to be present.

The Commission considered Respondent's request and staff's response. The request was **GRANTED.**

THIS MATTER is continued until the next available meeting of the Florida Elections Commission.

DONE AND ORDERED by the Florida Elections Commission on November 14, 2023.

Tim Vaccaro, J.D., Executive Director
For Chad Mizelle, Chairman
Florida Elections Commission

Copies furnished to:
Mattie T. Clay, Assistant General Counsel
Jason Edward Bloch, Esq., Respondent
Division of Elections, Filing Officer

STATE OF FLORIDA
FLORIDA ELECTIONS COMMISSION

In Re: Jason Edward Bloch **Case No.: FEC 23-133**

/

TO: Jason Edward Bloch
3501 West Glencoe Street
Miami, FL 33133

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

NOTICE OF HEARING (AUTOMATIC FINE (AF))

A hearing will be held in this case before the Florida Elections Commission on, **November 14, 2023 at 8:30 a.m.,** *or as soon thereafter as the parties can be heard*, at the following location: **402 South Monroe Street, 12 HOB, Tallahassee, Florida 32399.** Due to heightened security access requirements, please bring only essential items into the building and plan to arrive early to allow for delays coming through security.

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

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

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

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

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

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

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

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

See further instructions on the reverse side.

Tim Vaccaro
Executive Director
Florida Elections Commission
October 31, 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 to Sections 120.569 and 120.57(2), Florida Statutes; Chapter 28 and Commission Rule 2B-1.004, Florida Administrative Code. At the hearing, the Commission will decide whether the Respondent committed the violation(s) charged in the Order of Probable Cause. The Respondent will be permitted to testify. However, the Respondent may not call witnesses to testify.

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

FLORIDA ELECTIONS COMMISSION
CASE REPORT
Case Number: FEC 23-133

NAME: **JASON EDWARD BLOCH**

DATE APPEAL RECEIVED: 03/27/2023

DATE REPORT DUE: 06/24/2022 (2022 P1)

DATE OF ELECTRONIC RECEIPT: 11/21/2022

NUMBER OF DAYS LATE: 150

CANDIDATE [X]	STATE [X]
PC [ ]	DISTRICT [ ]
CCE [ ]	COUNTY [ ]
POLITICAL PARTY [ ]	CITY [ ]

AMOUNT OF FINE: **$3,971.68**

FINE BASED ON: ( ) NUMBER OF DAYS ( ) 25% OF RECEIPTS **(X)** 25% OF EXPENDITURES

TOTAL RECEIPTS FOR REPORTING PERIOD: $0

TOTAL EXPENDITURES FOR REPORTING PERIOD: $15,886.70

DATE OF FIRST NOTIFICATION: 03/08/2023 (Fine Ltr)

SUMMARY: The Honorable Jason Edward Bloch, Esquire was a candidate for Circuit Judge, Circuit 11, Group 52 in the 2022 elections. Judge Bloch was his own treasurer.

Judge Bloch is appealing the fine but did not provide supplemental information with his appeal.

- The 2022 P1 Original Report covers the period from 06/01/22-06/17/22; it was due on 06/24/22.
- The 2022 P1 Queued Transaction Report shows that it was created and filed on 06/26/22.[1]
- Judge Bloch reported receiving zero contributions while making 1 expenditure.
- FEC staff was advised, "The candidate filed a notice of no activity (waiver) on 06/26/22. A waiver is not a report. On 11/21/22, the candidate filed a report showing $15,886.70 of activity. The fine is based on 25% of the activity."
- The Division of Elections does not have any notes that pertain to Judge Bloch's 2022 P1 Report.

PRIOR CASES: None.

[1] The filing discussed in this bullet refers to the waiver that reflected zero activity.

Br'Axeton Wims

From: Donna Malphurs <Donna.Malphurs@myfloridalegal.com> on behalf of Florida Elections Commission <fec@myfloridalegal.com>
Sent: Monday, March 27, 2023 10:24 PM
To: Br'Axeton Wims
Subject: Fw: Notice of Appeal - Candidate 80533
Attachments: Notice Of Imposition Of Fine.pdf

----- Forwarded by Donna Malphurs/OAG on 03/27/2023 10:23 PM -----

From: <jebloch@att.net>
To: <fec@myfloridalegal.com>
Cc: <elecrecords@dos.myflorida.com>, <jebloch@att.net>
Date: 03/27/2023 05:01 PM
Subject: Notice of Appeal - Candidate 80533

Good afternoon,

Please allow this to serve as my notice of appeal of the fine assessed as stated in the attached letter bearing the date of March 8, 2023, but not postmarked until March 10, and not received by me until March 14, 2023.

Per Rule 2B-1.005, the notice of appeal shall contain the following information:

(a) The name, address and telephone number of the appealing party:

Jason Bloch

(b) A copy of the notice of imposition of fine issued by the filing officer: **see attached**; and,

(c) A request for hearing if a personal appearance before the Commission is desired: **I do hereby request such a hearing**.

Please confirm that you have received my notice and advise if anything else is required.

Thank you,

Jason Bloch, Esq.

(See attached file: Notice Of Imposition Of Fine.pdf)

FLORIDA DEPARTMENT OF STATE
Cord Byrd
Secretary of State
DIVISION OF ELECTIONS

March 8, 2023

Jason Edward Bloch
Candidate for Circuit Judge, Circuit 11, Group 52

CAN 80533

Dear Judge Bloch:

The campaign treasurer's report that was due on June 24, 2022, was filed on November 21, 2022. By law, you are automatically assessed a late fine of $3,971.68.

You have 20 days from the receipt of this notice to either:

1. Pay the fine to the Florida Division of Elections (For a candidate only, a fine is not an allowable campaign expenditure and must be paid from personal funds) at:

   Florida Division of Elections
   R.A. Gray Building, Room. 316
   500 South Bronough Street
   Tallahassee, Florida 32399-025011

2. Appeal the fine to the Florida Elections Commission (See Rules 2B-1.005 and 2B-1.0055, Florida Administrative Code) at:

   Florida Elections Commission
   107 West Gaines Street, Ste. 224
   Tallahassee, Florida 32399-0150

   (850) 922-4539
   fecc@myflondalegal.com

   If you appeal, please send a copy also to the Florida Division of Elections so that you will not receive further notices from the Division about this matter.

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

Sincerely,

Donna S. Brown, Chief
Bureau of Election Records

FLORIDA DEPARTMENT OF STATE
Cord Byrd
Secretary of State
DIVISION OF ELECTIONS

March 8, 2023

Jason Edward Bloch
Candidate for Circuit Judge, Circuit 11, Group 52

CAN 80533

[redacted]

Dear Judge Bloch:

The campaign treasurer's report that was due on June 24, 2022, was filed on November 21, 2022. By law, you are automatically assessed a late fine of $3,971.68.

You have 20 days from the receipt of this notice to either:

1. Pay the fine to the Florida Division of Elections (For a candidate only, a fine is not an allowable campaign expenditure and must be paid from personal funds) at:

   Florida Division of Elections
   R.A. Gray Building, Room. 316
   500 South Bronough Street
   Tallahassee, Florida 32399-025011

2. Appeal the fine to the Florida Elections Commission (See Rules 2B-1.005 and 2B-1.0055, Florida Administrative Code) at:

   Florida Elections Commission
   107 West Gaines Street, Ste. 224
   Tallahassee, Florida 32399-0150

   If you appeal, please send a copy also to the Florida Division of Elections so that you will not receive further notices from the Division about this matter.

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

Sincerely,

Donna S. Brown, Chief
Bureau of Election Records

FLORIDA DEPARTMENT OF STATE
Cord Byrd
Secretary of State
DIVISION OF ELECTIONS

July 19, 2022

Jason Edward Bloch
[redacted]

CAN 80533

Dear Judge Bloch:

The notification that you had no reportable activity for the report deadline of June 24, 2022, was not filed until June 26, 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

Donna S. Brown, Chief
Bureau of Election Records

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

(1) Jason Edward Bloch — Candidate, Committe or Party Name

(2) 80533 — I.D. Number

(3) _____ Address (number and street) _____ City _____ State _____ Zip Code

☐ Check box if address has changed since last report

(4) Check appropriate box(es):

- ☒ Candidate (office sought):
- ☐ Political Committee
- ☐ Committee of Continuous Existance
- ☐ Party Executive Committee
- ☐ Check If PC has DISBANDED
- ☐ Check If CCE has DISBANDED

(5) REPORT IDENTIFIERS

Cover Period: From 06/01/2022 To 06/17/2022 Report Type: P1

☐ Original ☒ Amendment ☐ Special Election Report

(6) CONTRIBUTIONS THIS REPORT	
Cash & Checks	$0.00
Loans	$0.00
Total Monetary	$0.00
In-Kind	$0.00

(7) EXPENDITURES THIS REPORT	
Monetary Expenditures	$15,886.70
Transfers to Office Account	$0.00
Total Monetary	$15,886.70

(8) Other Distributions

Certification

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

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

Name of ☐ Treasurer ☐ Deputy Treasurer

X _____
Signature

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

Name of ☒ Candidate ☐ Chaiman (PC/PTY Only

X _____
Signature

Prepared on: 4/17/23 11:19:19AM

Reviewed On: 3/23/23 4:42 pm

CAMPAIGN TREASURER'S REPORT – ITEMIZED CONTRIBUTIONS

Name: Jason Edward Bloch Report: 2022 P1 Period: 06/01/2022 to 06/17/2022

** Records in Filed Report **

Seq # / Date	Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip	Contributor Type	Occupation In-Kind Description	Amount Amend

CAMPAIGN TREASURER'S REPORT – ITEMIZED EXPENDITURES

Name: Jason Edward Bloch Report: 2022 P1 Period: 06/01/2022 to 06/17/2022

** Records in Filed Report **

Seq # / Date	Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip	Type	Purpose	Amount / Amend
1 06/11/2022	RICHARD MARANON & ASSOCIATES 2103 CORAL WAY, SUITE 305 CORAL GABLES, FL 33145	MON	CAMPAIGN CONSULTING AND OUTREACH, INCLUDING ADVERTISING AND MARKETING	$15,886.70 ADD

CAMPAIGN TREASURER'S REPORT – ITEMIZED FUND TRANSFERS

Name: Jason Edward Bloch Report: 2022 P1 Period: 06/01/2022 to 06/17/2022

** Records in Filed Report **

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

CAMPAIGN TREASURER'S REPORT – ITEMIZED DISTRIBUTIONS

Name: Jason Edward Bloch Report: 2022 P1 Period: 06/01/2022 to 06/17/2022

** Records in Filed Report **

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

Queued Items for 2022-P1

Account: **80533** **CTJ 011 Jason Edward Bloch**

Rpt Seq: 3

ProcessDescription	*Status*	*Submitter*	*Created*	*LastUpdate*
Create Pending Report	Processing Complete	80533	6/26/2022 3:57:03 PM	6/26/2022 3:57:03 PM
File Pending Report	Processing Complete	80533	6/26/2022 6:37:50 PM	6/26/2022 6:37:50 PM
Review Filed Report	Processing Complete	80533	11/21/2022 12:13:47 PM	11/21/2022 12:13:47 PM
Amend Filed Report	Processing Complete	80533	11/21/2022 12:14:08 PM	11/21/2022 12:14:08 PM
Review Pending Report	Processing Complete	80533	11/21/2022 12:21:19 PM	11/21/2022 12:21:19 PM
File Pending Report	Processing Complete	80533	11/21/2022 12:22:05 PM	11/21/2022 12:22:05 PM
Review Filed Report	Processing Complete	80533	3/23/2023 4:03:23 PM	3/23/2023 4:03:23 PM
Review Filed Report	Processing Complete	80533	3/23/2023 4:42:30 PM	3/23/2023 4:42:30 PM

Florida Department of State - Division of Elections

Florida Election System Reports

Candidate/Committee Lookup

Name: Bloch

Election:

Acct: 80533

Type: Candidate

Search Reset

Candidate Name: Jason Edward Bloch

Account: 80533

Date Due	Type	Date Filed	Status	Days Late	Fine Assessed	Appealed	Amount Fined	Amount Paid
11/21/2022	TR	11/21/2022						
9/2/2022	G1	9/2/2022						
8/19/2022	P7	8/19/2022						
8/12/2022	P6	8/12/2022						
8/5/2022	P5	8/4/2022						
7/29/2022	P4	7/29/2022						
7/22/2022	P3	7/22/2022						
7/8/2022	P2	7/8/2022						
6/24/2022	P1	6/26/2022	SNT	0	$3,971.68		$3,971.68	$0.00
6/24/2022	P1	6/26/2022	CLO	2	$0.00		$0.00	$0.00
6/10/2022	M5	6/10/2022						
5/10/2022	M4	5/10/2022						

FLORIDA DEPARTMENT of STATE

RON DESANTIS
Governor

LAUREL M. LEE
Secretary of State

April 27, 2022

Jason Edward Bloch
[redacted]

Dear Judge Bloch:

This will acknowledge receipt of the Appointment of Campaign Treasurer and Designation of Campaign Depository for the office of Circuit Judge, which was placed on file in our office on April 27, 2022. Your name has been placed on the 2022 active candidate list.

Campaign Treasurer's Reports

Your first campaign treasurer's report will be due on **May 10, 2022**. The report will cover the period of April 1-30, 2022 (2022 M4). All candidates who 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 your user identification number. Enclosed are your confidential, filing credentials.

EFS Website Address: https://efs.dos.state.fl.us
Identification Number: 80533

Timely Filing

All reports filed 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 of the first business day the EFS becomes operable. No fine will be levied during the period the EFS was inoperable.

Any candidate 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% of the total receipts or expenditures, whichever is greater, for the period covered by the late report. However, for 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 candidate 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: Chapters 104 and 106, Florida Statutes, *Candidate and Campaign Treasurer 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

Donna S. Brown, Chief
Bureau of Election Records

DSB/bct

Enclosures

APPOINTMENT OF CAMPAIGN TREASURER AND DESIGNATION OF CAMPAIGN DEPOSITORY FOR CANDIDATES

(Section 106.021(1), F.S.)

(PLEASE PRINT OR TYPE)

NOTE: This form must be on file with the qualifying officer before opening the campaign account.

RECEIVED
DEPARTMENT OF STATE
2022 APR 27 AM 10:58
DIVISION OF ELECTIONS
TALLAHASSEE, FL

OFFICE USE ONLY

1. CHECK APPROPRIATE BOX(ES):

☒ Initial Filing of Form Re-filing to Change: ☐ Treasurer/Deputy ☐ Depository ☐ Office ☐ Party

2. **Name of Candidate** (in this order: First, Middle, Last)
Jason, Edward, Bloch

3. Address (include post office box or street, city, state, zip code)
[redacted]

4. Telephone
[redacted]

5. E-mail address
jebloch@att.net

6. **Office sought** (include district, circuit, group number)
11th Judicial Circuit, Court Judge, Group 52

7. **If a candidate for a nonpartisan office, check if applicable:**
☐ My intent is to run as a Write-In candidate.

8. **If a candidate for a partisan office, check block and fill in name of party as applicable:** My intent is to run as a
☐ Write-In ☐ No Party Affiliation ☐ _____ Party candidate.

9. **I have appointed the following person to act as my** ☒ Campaign Treasurer ☐ Deputy Treasurer

10. Name of Treasurer or Deputy Treasurer
Jason Edward Bloch

11. Mailing Address
[redacted]

12. Telephone
[redacted]

13. City
[redacted]

14. County

15. State

16. Zip Code

17. E-mail address
jebloch@att.net

18. **I have designated the following bank as my** ☒ Primary Depository ☐ Secondary Depository

19. Name of Bank
TD Bank

20. Address
2401 Ponce De Leon Blvd.

21. City
Coral Gables

22. County
Miami-Dade

23. State
FL

24. Zip Code
33134

UNDER PENALTIES OF PERJURY, I DECLARE THAT I HAVE READ THE FOREGOING FORM FOR APPOINTMENT OF CAMPAIGN TREASURER AND DESIGNATION OF CAMPAIGN DEPOSITORY AND THAT THE FACTS STATED IN IT ARE TRUE.

25. Date
4/26/22

26. Signature of Candidate
X [signature]

27. **Treasurer's Acceptance of Appointment** (fill in the blanks and check the appropriate block)

I, Jason Edward Bloch, do hereby accept the appointment
(Please Print or Type Name)

designated above as: ☒ Campaign Treasurer. ☐ Deputy Treasurer.

4/26/22
Date

X [signature]
Signature of Campaign Treasurer or Deputy Treasurer

CANDIDATE OATH
JUDICIAL OFFICE

Check box ***only*** if you are seeking to qualify as a write-in candidate:

☐ Write-in candidate

RECEIVED
DEPARTMENT OF STATE
2022 APR 27 AM 10:58
DIVISION OF ELECTIONS
TALLAHASSEE FL

OFFICE USE ONLY

Candidate Oath

(Section 105.031, Florida Statutes)

I, Jason Edward Bloch ,

(Print name above as you wish it to appear on the ballot. If your last name consists of two or more names but has no hyphen, check box ☐ (see page 2 - Compound Last Names). No change can be made after the end of qualifying. Although a write-in candidate's name is not printed on the ballot, the name must be printed above for oath purposes.)

am a candidate for the judicial office of Circuit Court Judge (Office), _____ (District #), 11 (Circuit #),

52 (Group #); my legal residence is Miami-Dade County, Florida; I am a qualified elector of the state and of the territorial jurisdiction of the court to which I seek election; I am qualified under the Constitution and the Laws of Florida to hold the judicial office to which I desire to be elected or in which I desire to be retained; I have qualified for no other public office in the state, the term of which office or any part thereof runs concurrent with the office I seek; and I have resigned from any office which I am required to resign pursuant to Section 99.012, Florida Statutes; and I will support the Constitution of the United States and the Constitution of the State of Florida.

Section 876.05, Florida Statutes, oath (only applicable if elected and when term of office begins): I, a citizen of the State of Florida and of the United States of America, and being employed by or an officer of the court system and a recipient of public funds as such employee or officer, do hereby solemnly swear or affirm that I will support the Constitution of the United States and of the State of Florida.

Candidate's Florida Voter Registration Number (located on your voter information card): 109635823

Phonetic spelling for audio ballot: Print name phonetically on the line below as you wish it to be pronounced on the audio ballot as may be used by persons with disabilities (*see* instructions on page 2 of this form): *[Not applicable to write-in candidates.]*

JAI-SuhN ED-WAHRD BLAHK

X _____ [redacted] jebloch@att.net

Signature of Candidate | Telephone Number | Email Address

[redacted]

Address | City | State | ZIP Code

STATE OF FLORIDA

COUNTY OF Miami Dade

Sworn to (or affirmed) and subscribed before me by means of online notarization ☐ OR physical presence ☒

this 26 day of April, 2022

Personally Known ☐ OR Produced Identification ☒

Type of Identification Produced: FLDL

_____

Signature of Notary Public

Print, Type, or Stamp Commissioned Name of Notary Public below:

LEODAN MARTIN
Notary Public - State of Florida
Commission # GG 226262
My Comm. Expires Jun 24, 2022

STATEMENT OF CANDIDATE FOR JUDICIAL OFFICE

(Section 105.031(5), F.S.)

(Please Type)

OFFICE USE ONLY
DEPARTMENT OF STATE
2022 APR 27 AM 10:58
DIVISION OF ELECTIONS
TALLAHASSEE FL

I, Jason Edward Bloch

a judicial candidate, have received, read, and understand the requirements of the Florida Code of Judicial Conduct.

(Signature of candidate)

4-26-22

(Date)

Each candidate for judicial office, including an incumbent judge, shall file a statement with the qualifying officer, within 10 days after filing the Appointment of Campaign Treasurer and Designation of Campaign Depository.