

**BEFORE THE
STATE OF FLORIDA
COMMISSION ON ETHICS**

In re KEYSTONE/GOLDEN STATE)
STRATEGIES, INC.)
)
Appellant.)
_____)

Executive Branch Appeal No. L22-001

Final Order No.

FINAL ORDER

This matter came before the Commission on Ethics, meeting in public session on January 27, 2023, on the timely appeal of Keystone/Golden State Strategies, Inc., pursuant to Section 112.3215(5)(d), Florida Statutes, which assesses an automatic fine of \$50 per day on a lobbying firm that fails to timely file an executive branch compensation report. The Commission may waive the fine in whole or in part for good cause shown, based on unusual circumstances surrounding the failure to file by the designated due date. Appellant did not request a hearing before the Commission.

Findings of Fact

1. Appellant is a lobbying firm that receives, or is entitled to receive, compensation for the purpose of lobbying and is required to file a firm compensation report with the Commission on Ethics for each calendar quarter during any portion of which one or more of the firm's lobbyist(s) were registered to represent a principal.

2. During the first quarter of calendar year 2022 Appellant had one registered lobbyist. The statutory deadline for the filing of the executive branch firm compensation report for the first quarter of 2022 was May 15, 2022.

3. On April 1, 2022, Appellant was sent an email reminder regarding the requirement to file the firm's first quarter compensation report, which indicated the deadline for filing was May 15, 2022, at 11:59 p.m. EST.

4. On May 10, 2022, Appellant was sent a follow up courtesy email reminder regarding the requirement to file the firm's first quarter compensation report, which also indicated that the deadline for filing was May 16, 2022, at 11:59 p.m. EST.

5. On May 16, 2022, Appellant was sent an email notification advising the firm of its failure to timely file its first quarter compensation report and further stating that an automatic fine had begun to accrue.

6. On May 17, 2022, a Commission representative left two phone messages for Appellant indicating the deadline for filing its first quarter compensation report had passed and that a fine of \$50 per day had begun to accrue.

7. On June 10, 2022, the same Commission representative left two more messages for Appellant indicating the deadline for filing the first quarter compensation report had passed and that a fine was accruing.

8. That same day, June 10, 2022, a representative from Appellant's firm contacted the Commission and indicated he thought the firm had pre-filed, that no lobbying had occurred during the first quarter of 2022, and that he had been hospitalized with COVID and pneumonia. The Commission representative informed him that records indicated Appellant's last compensation report was filed in 2021, and suggested that he call again when he had better access to a computer.

9. Over a month later, on July 12, 2022, the same Commission representative left a message for Appellant indicating the first quarter compensation report was overdue and a fine was accruing.

10. On August 3, 2022, the same Commission representative left two messages for Appellant indicating the first quarter compensation reports had not been received, and that a fine was still accruing.

11. The Commission's representative left two similar message again on August 19, 2022, informing Appellant that its first quarter compensation report was overdue and that a fine was accruing.

12. On August 24, 2022, Appellant was sent by email a Notification of Assessed Fine via email. The notification included the total amount of Appellant's accrued automatic fine. The notification also included a notice of Appellant's right to appeal the fine.¹

13. The amount of fine automatically assessed against Appellant was \$5,000.

14. On September 16, 2022, the Commission's representative left two messages for Appellant indicating that, at that time, the maximum amount of fines had been reached and that, to avoid suspension, Appellant had to either pay its fine or appeal by September 23, 2022.

15. On September 23, 2022, the date that the appeal was due, the Commission's representative left two messages for Appellant indicating that the deadline to appeal the fine would expire at 11:59 p.m. EST.

¹ Section 112.3215(5)(d)4, Florida Statutes, provides for a one-time fine waiver the first time a lobbying firm fails to timely file an executive branch compensation report, so long as that report is filed within 30 days of the late notice. Appellant received this one-time fine waiver in association with a late-filed second quarter 2021 executive branch compensation report and is not eligible to receive another automatic fine waiver.

16. That same day, a representative from Appellant contacted the Commission and indicated he felt the matter had already been "squared away." The representative also indicated he understood the appeal deadline, and stated the firm's administrator had been sick and had passed away.

17. Subsequently that day, September 23, 2022, Appellant submitted an appeal of the automatic fine.²

18. In its appeal, Appellant states as grounds that it engaged in no lobbying activity during the first quarter of 2022, and that the firm's administrator had been ill and passed away on June 26, 2022.

19. On September 26, 2022, three days after submitting the appeal, Appellant filed its first quarter compensation report. The report indicated \$0 total compensation for the first quarter of 2022.

Conclusions of Law

20. The Commission has jurisdiction over Appellant and over the subject matter of this proceeding pursuant to Section 112.3215, Florida Statutes.

21. Section 112.3215(5)(d), Florida Statutes, assesses a fine of \$50 per day on an executive branch lobbying firm that fails to timely file a compensation report and provides that the Commission may waive the fine in whole or in part for good cause shown, based on "unusual circumstances surrounding the failure to file on the designated due date."

² Due to technical difficulties, Appellant's initial appeal, which was timely filed by email prior to 11:59 p.m. EST on September 23, 2022, was returned as undeliverable, prompting Appellant to re-submit the appeal the next day. Meanwhile, the appeal filing system—which had not recognized the timely appeal—automatically generated an email indicating that Appellant was required to pay the assessed fine as no appeal had been filed. A Commission representative explained in subsequent conversations with Appellant that the appeal would be considered as timely received.

22. Commission Rule 34-12.407(4), Florida Administrative Code, defines "unusual circumstances" as follows:

'Unusual circumstances' means uncommon, rare or sudden events over which the actor has no control and which directly result in the failure to act in accordance with the filing requirements. Circumstances which allow for time in which to take those steps necessary to assure compliance with the filing requirements shall be deemed not to constitute unusual circumstances.

23. The responsibility for timely filing of executive branch compensation reports rests with the lobbying firm, as does the burden of persuading the Commission that the failure to timely report resulted from "unusual circumstances."

24. Appellant raises two reasons in its appeal, the second of which constitutes an "unusual circumstance" justifying a waiver of its fine. Appellant's first reason is that it conducted no lobbying activity during the first quarter of 2022. Because the statute concerning compensation reports requires a quarterly filing even if no compensation was received (Section 112.3215(5(a)1.c., Florida Statutes), this reason fails to provide a basis for waiver. Appellant's second reason, though, is that its office administrator had been ill and passed away in June 2022. In separate written correspondence, Appellant clarified this administrator was the individual who prepared the firm's compensation reports, that no other employee was routinely involved in preparing the compensation reports, and that the administrator was hospitalized during April and May of 2022, which was the window of time for preparing the first quarter's report. Based on the representations of Appellant regarding this administrator, and the effect that the administrator's illness apparently had on Appellant's operations, the Commission finds Appellant has demonstrated that its failure to timely file the first quarter executive branch compensation

report resulted from "unusual circumstances," as defined, and that the fine in this matter should be waived.

Order

Based on the foregoing facts and conclusions of law, the Commission hereby waives the assessed fine of \$5,000.

ORDERED by the State of Florida Commission on Ethics meeting in public session on January 27, 2023.

Date Rendered

John Grant
Chair, Florida Commission on Ethics

THIS ORDER CONSTITUTES FINAL AGENCY ACTION. ANY PARTY WHO IS ADVERSELY AFFECTED BY THIS ORDER HAS THE RIGHT TO SEEK JUDICIAL REVIEW UNDER SECTION 120.68, AND SECTION 112.3241, FLORIDA STATUTES, BY FILING A NOTICE OF ADMINISTRATIVE APPEAL PURSUANT TO RULE 9.110 FLORIDA RULES OF APPELLATE PROCEDURE, WITH THE CLERK OF THE COMMISSION ON ETHICS, AT EITHER 325 JOHN KNOX ROAD, BUILDING E, SUITE 200, TALLAHASSEE, FLORIDA 32303 OR P.O. DRAWER 15709, TALLAHASSEE, FLORIDA 32317-5709; AND BY FILING A COPY OF THE NOTICE OF APPEAL ATTACHED TO WHICH IS A CONFORMED COPY OF THE ORDER DESIGNATED IN THE NOTICE OF APPEAL ACCOMPANIED BY THE APPLICABLE FILING FEES WITH THE APPROPRIATE DISTRICT COURT OF APPEAL. THE NOTICE OF ADMINISTRATIVE APPEAL MUST BE FILED WITHIN 30 DAYS OF THE DATE THIS ORDER IS RENDERED.

Copies furnished to:

Keystone/Golden State Strategies, Inc.
116 Pine Street 202
Harrisburg, PA 17101-1250

Executive Branch Lobbyist Registration Office
Claude Pepper Building, Rm G-68
111 W. Madison Street
Tallahassee, FL 32399-4990

JG/gps

Schafer, Grayden

From: Schafer, Grayden
Sent: Friday, October 14, 2022 10:34 AM
To: Schafer, Grayden
Subject: FW: Lobbyist Compensation Appeal

Email correspondence regarding appeal

From: Schafer, Grayden
Sent: Friday, October 07, 2022 2:24 PM
To: 'antitrust1@outlook.com' <antitrust1@outlook.com>
Subject: Lobbyist Compensation Appeal

Mr. Daskalakis:

I am an attorney with the Florida Commission on Ethics, and I've been assigned an appeal from Keystone/Golden State Strategies, LLC. The appeal concerns a fine that was imposed when the firm did not timely file its lobbyist compensation report for the first quarter of 2020. In the appeal, you indicate—on the firm's behalf—that your firm's administrator had been ill and passed away on June 26, 2022. I have a few questions concerning this basis for your appeal. If you would, please respond to this email with your answers to the questions below. If you have any questions, please let me know.

1. Was your firm's administrator routinely involved in preparing your lobbyist compensation reports?
2. In the past, has anyone at the firm besides the administrator been involved in preparing these reports? If so, were they still employed by the firm in April and May of 2022?
3. Was the administrator ill during April and May of 2022?

Thank you,

Gray Schafer
Assistant General Counsel
Florida Commission on Ethics
(850)-488-7864

From: Schafer, Grayden
Sent: Friday, October 07, 2022 2:31 PM
To: 'antitrust1@outlook.com' <antitrust1@outlook.com>
Subject: FW: Lobbyist Compensation Appeal

Mr. Daskalakis:

It appears I had a typo in my email from a few minutes ago. It should have read that your firm's appeal pertains to the lobbyist compensation report for the first quarter of **2022**, not 2020. This should not affect the 3 questions that were posed. Thank you, and have a great weekend.

Gray Schafer

From: Jim Daskalakis <antitrust1@outlook.com>
Sent: Thursday, October 13, 2022 2:53 PM
To: Schafer, Grayden <SCHAFER.GRAYDEN@leg.state.fl.us>
Subject: Re: Lobbyist Compensation Appeal

Hi Mr. Schafer , would have responded earlier but first email went to spam

1. Yes, in Florida and other registration states.
2. No, other than my review when required.
3. Yes, he was hospitalized and I was (and am) dealing with long COVID-19 syndrome

Email Detail

Resolve / Add comment

To: antitrust1@outlook.com; Firm Detail
(/Admin/RegistrationMaintenance/FirmDetailView/1570)
Subject: Notification of the Executive Branch One-Time Fine Waiver
Date Sent: 9/8/2021 4:10:04 PM
Body: Pursuant to Section 112.3215(5), F.S., each lobbying firm shall file a quarterly compensation report no later than 45 days after the end of each reporting period for which one or more of a firm's lobbyists were registered to represent a principal. Your firm's Executive branch report was not timely filed. According to Section 112.3215(5)(d)1., F.S., your lobbying firm could be assessed a fine of \$50 per day per report for each late day. However, pursuant to Section 112.3215(5)(d)4., F.S., your lobbying firm is entitled to a one-time fine waiver since its report was filed within 30 days after the Notice of Failure to File was transmitted to you and it is the first time any report was not timely filed by your lobbying firm.

This fine waiver will NOT be available for future filing periods, and a fine will be assessed for any subsequent late-filed reports.

If you have questions, contact the Lobbyist Registration Office at (850) 922-4990.

Do not reply to this email as it is generated automatically and electronically and cannot accept electronic replies.

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New recipient email address

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Email Detail

Resolve / Add comment

To: antitrust1@outlook.com; Firm Detail
(/Admin/RegistrationMaintenance/FirmDetailView/1570)

Subject: Reminder to File Compensation Report

Date Sent: 4/1/2022 6:00:13 AM

Body: **COMPENSATION REPORT FILING DEADLINE**

Lobbying firms must file their Executive branch quarterly compensation report(s) electronically for the quarter January 01 - March 31, 2022, no later than 11:59 pm EST on 5/15/2022.

To access the electronic filing system, go to <https://floridalobbyist.gov/>. Log in with the user name and password you established previously. Follow each step to submit the report successfully.

A report not filed by the deadline is a late-filed report and subject to penalties under Section 112.3215(5)(d)1., Florida Statutes. The fine for failing to file a report timely is \$50 per day per report for each day the report is late up to a maximum of \$5,000.

Contact the Lobbyist Registration Office at (850) 922-4990 for further assistance.

Do not reply to this email as it is generated automatically and electronically and cannot accept electronic replies.

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Resolve / Add comment

To: antitrust1@outlook.com; Firm Detail
(/Admin/RegistrationMaintenance/FirmDetailView/1570)
Subject: Second Reminder to File Compensation Report
Date Sent: 5/10/2022 6:00:11 AM
Body:

COMPENSATION REPORT FILING DEADLINE

Lobbying firms must file their Executive branch quarterly compensation report(s) electronically for the quarter January 01 - March 31, 2022, no later than 11:59 pm EST on 5/15/2022.

To access the electronic filing system, go to <https://floridalobbyist.gov/>. Log in with the user name and password you established previously. Follow each step to submit the report successfully.

A report not filed by the deadline is a late-filed report and subject to penalties under Section 112.3215(5)(d)1., Florida Statutes. The fine for failing to file a report timely is \$50 per day per report for each day the report is late up to a maximum of \$5,000.

Contact the Lobbyist Registration Office at (850) 922-4990 for further assistance.

Do not reply to this email as it is generated automatically and electronically and cannot accept electronic replies.

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Resolve / Add comment

To: antitrust1@outlook.com; Firm Detail
(/Admin/RegistrationMaintenance/FirmDetailView/1570)
Subject: Notification of Failure to File Lobbying Firm Compensation Report
Date Sent: 5/16/2022 6:00:09 AM
Body: Keystone/ Golden State Strategies:

Pursuant to Section 112.3215(5), F.S., each lobbying firm shall file a quarterly compensation report no later than 45 days after the end of each reporting period for which one or more of a firm's lobbyists were registered to represent a principal. Your firm received two courtesy notices of the deadline -- the first on 04/01/2022 and the second on 05/10/2022. Your Executive quarterly compensation report, which was due on 5/15/2022, has not been received by the Lobbyist Registration Office.

Section 112.3215(5), F.S., requires that the Lobbyist Registration Office immediately notify the lobbying firm of its failure to file said report and that a fine is being assessed at \$50 per day per report for each late day.

Upon receipt of the quarterly compensation report, the Lobbyist Registration Office will notify you of the specific amount of the fine. Such fines must be paid to the Lobbyist Registration Office within 30 days after the Notification of Assessed Fine is electronically mailed to you unless an appeal is filed with the Office.

If you require further assistance, contact the Lobbyist Registration Office at (850) 922-4990 or help@floridalobbyist.gov (mailto:help@floridalobbyist.gov).

Do not reply to this email as it is generated automatically and electronically and cannot accept electronic replies.

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Comment

By

Date

Comment**By****Date**

L called 2:27 p.m. 202-403-4375. Thanked him for calling. Thought this was squared away. Confirmed w/ him stating email of record. Shared 9 emails sent & numerous calls made to help. Referred him to emails. Not at computer & may not know log in. He recorded 112.3215(5) & 11.045(3) for reference to making appeal. Understands deadline & will email appeal request re Q1 for both branches. His Administrator passed away & he has been sick. Q2 fine accruing.

karenmb

09/23/2022
3:25 pm

Dimitri Daskalakis called the LRO @ 2:27 PM (after KMB called earlier & left a vm msg.) He said he has had COVID & the office mgr passed away in June. He said he intends to appeal the fine. I reminded him the deadline to appeal is 11:59 PM today 9/23. Referred him to the assessed/capped fine email for instructions but not to hesitate to call LRO back by COB today for assistance.

ryan.patty

09/23/2022
3:23 pm

LM 717-559-0500 & 202-403-4375 Deadline to pay or appeal is 9/23 @11:59 pm est. Desire to appeal, email... stating intent is to appeal your failure to file Exec & Leg Branch Comp Reports for Q1 2022 & the \$10,000 fine. Repeated email & deadline. Otherwise, log in to firm account & pay w/ a CC. Repeated deadline. Requested anyone who receives message to call for help filing, paying or appealing. Exec refers unpaid fines to a collection agent.

karenmb

09/23/2022
11:12 am

10:10 a.m./10:13 a.m. LM 717-559-0500 & 202-403-4375 calling out of concern. \$10,000 fine for not filing Q1 Exec & Leg Branch FL Comp Reports is due 9/23/22. To avoid suspension, KGSS must pay \$10,000 fine or appeal by 9/23/22. Emails were sent 8/24/2022. If anyone needs assistance filing reports, paying fine or appealing, call. Q2 reports past due, fine is \$3,300 & accruing \$50 per day, per report. NOTE: 8/24 PR LMs re Q1 & Q2 offering help.

karenmb

09/16/2022
10:56 am

Called 717-559-0500 & 202-403-4375 LM for lobbyist, firm owner, partner or other rep. calling out of concern re: comp reports that were due 5/15 for Q1 & the fine as of today, 8/19 is \$9600. Also, comp reports for Q2 were due 8/14 & as of today the fine is \$500. Fines are being assessed at \$50 per day, per report, per quarter. Call for assistance filing reports, paying fines & or appealing, we are happy to help. Repeated name, office & phone no.

karenmb

08/19/2022
3:09 pm

I called 717-559-0500 and 202-403-4375. I left detailed voicemail messages about the outstanding Legislative and Executive Branch quarterly compensation reports and the fines that are accruing. I requested the lobbyist or another representative of the firm to PLEASE return my call as soon as possible. I will gladly assist the firm with filing the reports and taking the next step regarding the late fines.

ryan.patty

08/10/2022
10:44 am

Comment	By	Date
<p>LM 717-559-0500 & 202-403-4375 @ 9:48 & 9:51. This is Karen in the FL LRO calling out of concern. KGSS lobbying firm exec & leg comp reports that were due May 15 for Q1 have not been filed. A \$50 fine for each report is being assessed daily. As of today, 8/3, the total fine is \$8000. Pls call LRO for assistance filing the reports & paying the fines or appealing the fines. Our number is... & we are happy to help.</p>	karenmb	08/03/2022 10:02 am
<p>I called the firm at 717-559-0500 & 202-403-4375 @ 3:43 PM and left a detailed voicemail msg. that I am calling out of an abundance of concern. The lobbying firm compensation report for qtr. 1 that was due May 15 has not been filed. A \$50 fine is accruing daily for each day the report is late. As of today July 21, the fine is \$3,350. Please call the LRO @ 850-922-4990. We can provide assistance with filing the report and paying or appealing the fine.</p>	ryan.patty	07/21/2022 4:07 pm
<p>10:26 a.m. LM 717-559-0500. Karen, the Exec Branch Registrar in FL LRO calling to assist KGSS re filing their Q1 Exec. & Leg Branch Comp. Reports that were due 5/15/22. As of 7/12, the total fine for not filing the reports is \$5,800. This includes \$2,900 for exec & \$2,900 for leg. Fines are being assessed at \$50 per day per report. If ya'll need any assistance logging in to your firm account, please call Karen or Patty, the leg. registrar.</p>	karenmb	07/12/2022 10:46 am
<p>10:11 am 202-403-4375 "Thought he prefiled, no activity, needs to cancel, out w/ COVID/Pneumonia for month, having breathing trouble, waiting to be released." Shared it was 2021 when he filed. Needs computer, so he can talk & check note. Someone could probably bring him his computer in an hour, can't afford \$2,600 he has medical bills. Suggested he call when he had computer, we could file reports & take it from there. Thanked him again for returning call.</p>	karenmb	06/10/2022 11:32 am
<p>LVM on 717-559-0500 @ 9:23 & 202-403-4375 @ 9:33 re KGSS past due filing Q1 FL Exec & Leg Branch Lobbying Firm Comp Reports. Reports were due 5/15. Q1 consists of the months 1/1-3/31. Fines are being assessed @ \$50 per day per report. As of today, 6/10, the combined fines are \$2,600. Please call for any assistance re filing these compensation reports. Repeated name & phone number.</p>	karenmb	06/10/2022 9:44 am
<p>I called 717.559.0500 @ 2:15 PM. The firm has a generic voicemail message. I left a clear, detailed message stating that I'm calling from the Florida Lobbyist Registration Office in an abundance of concern regarding the Q.1 Leg. & Exec. compensation reports for Keystone/ Golden State Strategies that were due May 15. PLEASE call the LRO @ 850.922.4990 as soon as possible Mon. – Fri. 7:30 AM – 5:30 PM. Ask for Patty or Karen.</p>	ryan.patty	06/06/2022 2:34 pm

Comment**By****Date**

I called the firm and spoke to Steve Gordon. He is aware of the requirements and that a fine that is accruing. Dimitri Daskalakis, Sr. Partner/filer has COVID. Mr. Gordon will contact him in an attempt to get the report filed. I told him not to hesitate to call the LRO for further assistance.

ryan.patty

05/18/2022
4:17 pm

4:29 p.m. LM on cell 202-403-4375. Important message the Deadline for filing FL Lobbyist Comp Reports for Q1 was 5/15. Per F.S. there is a \$50 per day, per report fine accruing & as of today, 5/17 KGSS, total fine for both the exec. branch & leg. Branch is \$200. For assistance logging in to your firm account & filing your exec & leg reports call. Repeated name, number, date of call, fine amounts, deadline, & offered Q1 months 1/1/22-3/31/22.

karenmb

05/17/2022
4:42 pm

3:48 p.m. LM for Lobbyist on 717-559-0500. This is an important message the Deadline for filing FL Lobbyist Compensation Reports for Quarter 1 was 5/15. Per F.S. there is a \$50 per day, per report fine & as of today, 5/17 Keystone/Golden State Strategies, total fine for both the exec. & leg. Branch is \$200. Repeated name, number, date of call, fine amounts, deadline and offered Q1 months consisting of 1/1/22-3/31/22.

karenmb

05/17/2022
4:03 pm

Email Detail

[Resolve / Add comment](#)

To: antitrust1@outlook.com; Firm Detail
(/Admin/RegistrationMaintenance/FirmDetailView/1570)
Subject: Notification of Assessed Fine, Capped Fine
Date Sent: 8/24/2022 6:00:06 AM
Body: Keystone/ Golden State Strategies:

Your lobbying firm's Executive branch quarterly compensation report, due on 5/15/2022, has not been received. According to Section 112.3215(5)(d)1., F.S., you are assessed a fine of \$50 per day per report for each day a report was late, not to exceed \$5,000. Since the report has not been received within 100 days from the filing deadline, your fine has been capped in the amount of \$5,000, which is \$50 per day per report for each late day of 100 days.

Pursuant to Section 112.3215(5)(d)3., F.S., such fine must be paid within 30 days after the Notification of Assessed Fine being electronically mailed to you, unless appeal is made to the Lobbyist Registration Office. Payment may be submitted electronically by MasterCard, Visa, Discover or American Express. Click on the arrow next to Firm option at the top of your firm page. Select the fines option then proceed to pay by credit card or print an invoice and mail with a check to the LRO.

Section 112.3215(5)(d)5., F.S., provides that a lobbying firm may appeal or dispute a fine based upon unusual circumstances surrounding the failure to file on the designated due date, and may request and is entitled to a hearing before the Commission on Ethics. Any such request must be made within 30 days after this Notice of Payment Due and the lobbying firm shall notify this Office of its intention to request a hearing. A failure to timely file such notice will constitute a waiver of the right of appeal. The notice of appeal and/or request for a hearing should be sent to:

Lobbyist Registration Office
111 W. Madison Street
Pepper Building, G68
Tallahassee, FL 32399

If the fine is not paid or appealed within the 30 day time period, pursuant to Section 112.3215(5)(d)6., F.S., all registrations of lobbyists who are partners, owners, officers or employees of the lobbying firm that fails to timely pay a fine are automatically suspended until the fine is paid or waived, and the Office shall promptly notify all affected principals of each suspension.

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Comment

By

Date

9/23 LRO received appeal request; 9/26 called L & helped him log in to firm account providing user name & he reset Password. He filed Exec & Leg Branch reports for Q1, Q2, & Q3. Reminded him if he no longer had an agreement with the principal, to cancel the registration. He said he was still under contract for Q4 & unsure about the money. He said since he had the PW he would be able to file for Q4.

karenmb

09/26/2022
3:21 pm

L returned call 2:27 p.m. 202-403-4375. Thanked him. Thought this was squared away. Confirmed w/ him stating email of record. Shared 9 emails sent & numerous calls made to help. Referred him to emails. Not at computer & may not know log in. He recorded 112.3215(5) & 11.045(3) for reference to making appeal. Understands deadline & will email appeal request re Q1 for both branches. His Administrator passed away & he has been sick. Q2 fine accruing.

karenmb

09/23/2022
4:33 pm

Murphy-Bunton, Karen

From: Jim Daskalakis <antitrust1@outlook.com>
Sent: Friday, September 23, 2022 7:24 PM
To: Florida Lobbyist
Subject: Re: Final Reminder Notification of Assessed Fine
Attachments: Final Reminder Notification of Assessed Fine.pdf

Categories: Red Category

please take notice that appeal of the fine and failure to file ; latter of which was for reasons beyond our reasonable control and that would constitute excusable neglect is hereby taken with respect to both legislative and regulatory matters as provided for under applicable Florida Statutes and Regulations Dimitri Daskalakis

Sent from my iPhone

On Sep 19, 2022, at 3:36 PM, Florida Lobbyist <help@floridalobbyist.gov> wrote:

Please see the attached letter from the Lobbyist Registration Office.



WILTON SIMPSON
President of the Senate

THE FLORIDA LEGISLATURE

OFFICE OF LEGISLATIVE SERVICES

LOBBYIST REGISTRATION OFFICE



CHRIS SPROWLS
*Speaker of the House of
Representatives*

September 19, 2022

VIA EMAIL

Attn: Senior Officer, Partner or Owner
Keystone/ Golden State Strategies
antitrust1@outlook.com
CC: Dimitri Daskalakis

RE: Fine Due Date and Obligations

On August 24, 2022, the Lobbyist Registration and Compensation Reporting System (LRCRS) issued a Notification of Assessed Fine, Capped Fine to Keystone/ Golden State Strategies at antitrust1@outlook.com assessing a fine of \$5,000 for failing to file its legislative branch lobbying compensation report for the first quarter of 2022. Pursuant to section 11.045(3)(d)3, *Florida Statutes* (2021), this fine must be paid within 30 days after the notice of payment due unless appeal is made to the Lobbyist Registration Office (LRO).

Should a lobbying firm fail to pay the assessed fine by the due date, Rule 1.5(7)(a) of the Joint Rules of the Florida Legislature (2020) requires that “[a]ll lobbyist registrations for lobbyists who are partners, owners, officers, or employees of a lobbying firm [...] are automatically suspended until the fine is paid or waived and all late reports have been filed or waived.” Further, when any such suspension occurs the LRO is required to notify all affected principals, the President of the Senate, and the Speaker of the House of Representatives.

As of the date of this letter, the Lobbyist Registration Office has not received a notice of appeal with regard to this fine. Therefore, **the deadline for Keystone/ Golden State Strategies to pay or appeal the fine assessed is September 23, 2022**. Should the LRO not receive payment or an appeal of this fine by that date, the following lobbyists will be automatically suspended from lobbying any member of the Florida Legislature:

- **Dimitri Daskalakis**

As a reminder, all lobbyists who are partners, owners, officers, or employees of a lobbying firm are jointly and severally liable for any outstanding fine owed by a lobbying firm. Rule 1.5(7)(a), Joint Rules.

Please refer to the Notification of Assessed Fine for instructions on payment.

Sincerely,

Patty Ryan

Schafer, Grayden

From: Murphy-Bunton, Karen
Sent: Tuesday, January 10, 2023 9:46 AM
To: Schafer, Grayden
Subject: FW: Undeliverable: Re: Notification of Assessed Fine, Capped Fine
Attachments: mime-attachment; Re: Notification of Assessed Fine, Capped Fine

Gray: Per your request. Karen MB

From: Jim Daskalakis <antitrust1@outlook.com>
Sent: Saturday, September 24, 2022 1:20 AM
To: Florida Lobbyist <help@floridalobbyist.gov>
Subject: Fwd: Undeliverable: Re: Notification of Assessed Fine, Capped Fine

Sent from my iPhone

Begin forwarded message:

From: Microsoft Outlook <postmaster@outlook.com>
Date: September 23, 2022 at 11:00:04 PM EDT
To: Microsoft Outlook <postmaster@outlook.com>
Subject: Undeliverable: Re: Notification of Assessed Fine, Capped Fine

Delivery has failed to these recipients or groups:

LobbyistRegistrationInfo@mail.floridalobbyist.gov (LobbyistRegistrationInfo@mail.floridalobbyist.gov)
Your message couldn't be delivered. When Office 365 tried to send the message, the external email server returned the error below. This is probably due to a problem or policy setting on the recipient's email system.

Check the error for information about the problem. The error might tell you what went wrong and how to fix it. For example, if it says the message was blocked due to a potential virus, try sending the message again without attachments.

For Email Admins

This error was reported by an email server outside Office 365, and if the sender is unable to fix the problem by modifying their message then it's likely that it's a problem that only the recipient's email admin can fix.

1. **Check the error for information about the problem.** The error might tell you what went wrong and provide clues for how to fix it. For example, if it says the message was rejected due a Sender Policy Framework (SPF) issue then you'll have to work with your domain registrar to properly configure your SPF record.

2. **Check the error for information about where the problem is happening.** For example, look for a domain name like contoso.com. This tells you which organization was responsible for the error. The recipient's email server could be causing the problem, or it could be due to a third-party service that your organization or the recipient's organization is using to process or filter email messages.
3. **If you can't fix the problem, contact the responsible party's email admin.** This could be the recipient's email admin, your smart host service admin, or someone similar. Provide them with the error code and error message from this non-delivery report (NDR) to help them troubleshoot the issue.

Unfortunately, Office 365 support is unlikely to be able to help with these kinds of externally reported errors.

Diagnostic information for administrators:

Generating server: DM6PR12MB4928.namprd12.prod.outlook.com

LobbyistRegistrationInfo@mail.floridalobbyist.gov

Remote Server returned '550 5.0.350 Remote server returned an error -> 550 #5.1.0 Address rejected.'

Original message headers:

```
ARC-Seal: i=1; a=rsa-sha256; s=arcselector9901; d=microsoft.com; cv=none;
b=C5bk2T2nXo1CNC6mV85/6ATc41Dvnp3Cf4SWEdgH/oiHyRIrcU+x59qybd4p1d1L570eWkDx+a+
lexndlzRtPQtJ7gNf2z7vhNe8VLoSpjwdoIUAb1Eh9N8Ye6j1HFzs6QDt6oVyx3J8rSuLhpHK1CVG
heAWBIM7jqS+R608KYGcTLiTFhzOWs7Y8kKYjBadcrt6Lyx4P+2Z8t9fBlNrWR2stxEPKOKKtDJQn
gnmbm9XnhSXgqXpzgjtVqJ6soHolNO8KFESJNJxb7Hh1X0tYUxPC+LswaFl6+Fqfb4Isxtq6AoRPO
ZwxcAubRxuLOLrsh4lXqOE7qUDMoqcVDi7/w==
ARC-Message-Signature: i=1; a=rsa-sha256; c=relaxed/relaxed; d=microsoft.com;
s=arcselector9901;
h=From:Date:Subject:Message-ID:Content-Type:MIME-Version:X-MS-Exchange-
AntiSpam-MessageData-ChunkCount:X-MS-Exchange-AntiSpam-MessageData-0:X-MS-
Exchange-AntiSpam-MessageData-1;
bh=Nl1CjrBJ8+hDGhBgjMW8ZtjkwWrF9vCW4BXde9GFyTA=;
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bhHUWj3FZdrS9SnDlYlwmQ2hZw3YT4tqfVVRgzKOVTE8Rh4MBZW35+kv7K3nKG0fGyONDQt912LBWF
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dNeyICiVeC7FywWRMI2rxJv53EUZBSnIO4aA==
ARC-Authentication-Results: i=1; mx.microsoft.com 1; spf=none; dmarc=none;
dkim=none; arc=none
```

DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=outlook.com; s=selector1; h=From:Date:Subject:Message-ID:Content-Type:MIME-Version:X-MS-Exchange-SenderADCheck; bh=Nl1CjrBJ8+hDGhBgjMW8ZtjkwWrF9vCW4BXde9GFyTA=;

b=N2apsqIRIdXluHaRxZzsgb458026ikRO5m4Dc43/lmDB+Ksl90C927uaHjLftUYzKCuiQ3YTn7LeetDTzfTY7jnfLitXl690E2Lm4XW/FgEY4GFdZH5vdjUc+5F/dwaDvJDsFlK+cxnf733hHaA3pJbtvxxD4NW2lkRWJUvTmxlhBitWLUYOImWI8XiQcmoU1XA6QV9TqKYHBnhjeaK1qgly3ViBrCFH9w5kSjQT2BU3NV4hqC+f8NCPfVCCkNdAezSpMsamRL5x55sWncqW8Mw7OsQxrevRwCAsJEX8GxC0GmLdBhChE5yrsR45EP7t9bRBq42bgfNh7AIViY1hlw==

Received: from BYAPR12MB2917.namprd12.prod.outlook.com (2603:10b6:a03:130::14) by DM6PR12MB4928.namprd12.prod.outlook.com (2603:10b6:5:1b8::14) with Microsoft SMTP Server (version=TLS1_2, cipher=TLS_ECDHE_RSA_WITH_AES_256_GCM_SHA384) id 15.20.5654.22; Sat, 24 Sep 2022 02:59:57 +0000

Received: from BYAPR12MB2917.namprd12.prod.outlook.com ([fe80::55ea:5c1c:af06:ea7c]) by BYAPR12MB2917.namprd12.prod.outlook.com ([fe80::55ea:5c1c:af06:ea7c%2]) with mapi id 15.20.5654.018; Sat, 24 Sep 2022 02:59:57 +0000

From: Jim Daskalakis <antitrust1@outlook.com>
To: "LobbyistRegistrationInfo@mail.floridalobbyist.gov"
<LobbyistRegistrationInfo@mail.floridalobbyist.gov>
Subject: Re: Notification of Assessed Fine, Capped Fine
Thread-Topic: Notification of Assessed Fine, Capped Fine
Thread-Index: AQHYt6EM1aDov18hykWAmqqrstUVb63uFDRR
Date: Sat, 24 Sep 2022 02:59:57 +0000
Message-ID:
<BYAPR12MB291789CFC857D2D83E5816548B509@BYAPR12MB2917.namprd12.prod.outlook.com>

References: <[6f92ac\\$5o9a3@pb-esa-c300v-2.leg.fl.a.int](mailto:6f92ac$5o9a3@pb-esa-c300v-2.leg.fl.a.int)>
In-Reply-To: <[6f92ac\\$5o9a3@pb-esa-c300v-2.leg.fl.a.int](mailto:6f92ac$5o9a3@pb-esa-c300v-2.leg.fl.a.int)>
Accept-Language: en-US
Content-Language: en-US
X-MS-Has-Attach:
X-MS-TNEF-Correlator:
x-ms-exchange-messagesentrepresentingtype: 1
x-tmn: [MQxHRtOG5XuKjyFceSw0kmJ+2wiaiL8t]
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x-ms-trafficdiagnostic: BYAPR12MB2917:EE_|DM6PR12MB4928:EE_
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x-microsoft-antispam-message-info:
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MIME-Version: 1.0
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X-MS-Exchange-CrossTenant-AuthAs: Internal
X-MS-Exchange-CrossTenant-AuthSource: BYAPR12MB2917.namprd12.prod.outlook.com
X-MS-Exchange-CrossTenant-RMS-PersistedConsumerOrg: 00000000-0000-0000-0000-000000000000
X-MS-Exchange-CrossTenant-Network-Message-Id: eac663f9-36d9-42c3-2947-08da9dd8dd2f
X-MS-Exchange-CrossTenant-originalarrivalttime: 24 Sep 2022 02:59:57.5386 (UTC)
X-MS-Exchange-CrossTenant-fromentityheader: Hosted
X-MS-Exchange-CrossTenant-id: 84df9e7f-e9f6-40af-b435-aaaaaaaaaaaa
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X-MS-Exchange-Transport-CrossTenantHeadersStamped: DM6PR12MB4928



WILTON SIMPSON
President of the Senate

THE FLORIDA LEGISLATURE

OFFICE OF LEGISLATIVE SERVICES

LOBBYIST REGISTRATION OFFICE



CHRIS SPROWLS
*Speaker of the House of
Representatives*

September 19, 2022

VIA EMAIL

Attn: Senior Officer, Partner or Owner
Keystone/ Golden State Strategies
antitrust1@outlook.com
CC: Dimitri Daskalakis

RE: Fine Due Date and Obligations

On August 24, 2022, the Lobbyist Registration and Compensation Reporting System (LRCRS) issued a Notification of Assessed Fine, Capped Fine to Keystone/ Golden State Strategies at antitrust1@outlook.com assessing a fine of \$5,000 for failing to file its legislative branch lobbying compensation report for the first quarter of 2022. Pursuant to section 11.045(3)(d)3, *Florida Statutes* (2021), this fine must be paid within 30 days after the notice of payment due unless appeal is made to the Lobbyist Registration Office (LRO).

Should a lobbying firm fail to pay the assessed fine by the due date, Rule 1.5(7)(a) of the Joint Rules of the Florida Legislature (2020) requires that “[a]ll lobbyist registrations for lobbyists who are partners, owners, officers, or employees of a lobbying firm [...] are automatically suspended until the fine is paid or waived and all late reports have been filed or waived.” Further, when any such suspension occurs the LRO is required to notify all affected principals, the President of the Senate, and the Speaker of the House of Representatives.

As of the date of this letter, the Lobbyist Registration Office has not received a notice of appeal with regard to this fine. Therefore, **the deadline for Keystone/ Golden State Strategies to pay or appeal the fine assessed is September 23, 2022**. Should the LRO not receive payment or an appeal of this fine by that date, the following lobbyists will be automatically suspended from lobbying any member of the Florida Legislature:

- **Dimitri Daskalakis**

As a reminder, all lobbyists who are partners, owners, officers, or employees of a lobbying firm are jointly and severally liable for any outstanding fine owed by a lobbying firm. Rule 1.5(7)(a), Joint Rules.

Please refer to the Notification of Assessed Fine for instructions on payment.

Sincerely,

Patty Ryan

Murphy-Bunton, Karen

From: Jim Daskalakis <antitrust1@outlook.com>
Sent: Saturday, September 24, 2022 1:20 AM
To: Florida Lobbyist
Subject: Fwd: Final Reminder Notification of Assessed Fine
Attachments: Final Reminder Notification of Assessed Fine.pdf

Categories: Red Category

Sent from my iPhone

Begin forwarded message:

From: Jim Daskalakis <antitrust1@outlook.com>
Date: September 23, 2022 at 7:23:42 PM EDT
To: Florida Lobbyist <help@floridalobbyist.gov>
Subject: Re: Final Reminder Notification of Assessed Fine

please take notice that appeal of the fine and failure to file ; latter of which was for reasons beyond our reasonable control and that would constitute excusable neglect is hereby taken with respect to both legislative and regulatory matters as provided for under applicable Florida Statutes and Regulations
Dimitri Daskalakis

Sent from my iPhone

On Sep 19, 2022, at 3:36 PM, Florida Lobbyist <help@floridalobbyist.gov> wrote:

Please see the attached letter from the Lobbyist Registration Office.



WILTON SIMPSON
President of the Senate

THE FLORIDA LEGISLATURE

OFFICE OF LEGISLATIVE SERVICES

LOBBYIST REGISTRATION OFFICE



CHRIS SPROWLS
*Speaker of the House of
Representatives*

September 19, 2022

VIA EMAIL

Attn: Senior Officer, Partner or Owner
Keystone/ Golden State Strategies
antitrust1@outlook.com
CC: Dimitri Daskalakis

RE: Fine Due Date and Obligations

On August 24, 2022, the Lobbyist Registration and Compensation Reporting System (LRCRS) issued a Notification of Assessed Fine, Capped Fine to Keystone/ Golden State Strategies at antitrust1@outlook.com assessing a fine of \$5,000 for failing to file its legislative branch lobbying compensation report for the first quarter of 2022. Pursuant to section 11.045(3)(d)3, *Florida Statutes* (2021), this fine must be paid within 30 days after the notice of payment due unless appeal is made to the Lobbyist Registration Office (LRO).

Should a lobbying firm fail to pay the assessed fine by the due date, Rule 1.5(7)(a) of the Joint Rules of the Florida Legislature (2020) requires that “[a]ll lobbyist registrations for lobbyists who are partners, owners, officers, or employees of a lobbying firm [...] are automatically suspended until the fine is paid or waived and all late reports have been filed or waived.” Further, when any such suspension occurs the LRO is required to notify all affected principals, the President of the Senate, and the Speaker of the House of Representatives.

As of the date of this letter, the Lobbyist Registration Office has not received a notice of appeal with regard to this fine. Therefore, **the deadline for Keystone/ Golden State Strategies to pay or appeal the fine assessed is September 23, 2022**. Should the LRO not receive payment or an appeal of this fine by that date, the following lobbyists will be automatically suspended from lobbying any member of the Florida Legislature:

- **Dimitri Daskalakis**

As a reminder, all lobbyists who are partners, owners, officers, or employees of a lobbying firm are jointly and severally liable for any outstanding fine owed by a lobbying firm. Rule 1.5(7)(a), Joint Rules.

Please refer to the Notification of Assessed Fine for instructions on payment.

Sincerely,

Patty Ryan

Murphy-Bunton, Karen

From: Jim Daskalakis <antitrust1@outlook.com>
Sent: Saturday, September 24, 2022 1:20 AM
To: Florida Lobbyist
Subject: Fwd: Notification of Assessed Fine, Capped Fine

Categories: Red Category

Sent from my iPhone

Begin forwarded message:

From: Jim Daskalakis <antitrust1@outlook.com>
Date: September 23, 2022 at 10:59:58 PM EDT
To: LobbyistRegistrationInfo@mail.floridalobbyist.gov
Subject: Re: Notification of Assessed Fine, Capped Fine

We are appealing both the legislative and regulatory assessments and the underlying failure to file as we had no activity or compensation; and our firm administrator had been ill and passed away on 6/26/22 Dimitri Daskalakis

Sent from my iPhone

On Aug 24, 2022, at 6:00 AM,
LobbyistRegistrationInfo@mail.floridalobbyist.gov wrote:

Keystone/ Golden State Strategies:

Your lobbying firm's legislative quarterly compensation report, due on 5/15/2022, has not been received. According to section 11.045(3)(d)1., F.S., you are assessed a fine of \$50 per day per report for each day a report was late, not to exceed \$5,000. Since the report has not been received within 100 days from the filing deadline, your fine has been capped in the amount of \$5,000, which is \$50 per day per report for each late day of 100 days.

Pursuant to section 11.045(3)(d)3., F.S., such fine must be paid within 30 days after the Notification of Assessed Fine being electronically mailed to you, unless appeal is made to the Lobbyist Registration Office. Payment may be submitted electronically by MasterCard, Visa, Discover or American Express. When logged in as a firm, click the arrow next to the "Firm" button at the top of your firm account page. Then select "Fines" and pay by credit card or print an invoice and mail with a check to the LRO (address below).

Section 11.045 (3)(d)5., F.S., provides that a lobbying firm may appeal or dispute a fine based upon unusual circumstances surrounding the failure to file on the designated due date, and may request and is entitled to a hearing before the General Counsel of the Office of Legislative Services. Any such request must be made within 30 days after this Notice of Payment Due and the lobbying firm shall notify this Office of its intention to request a hearing. A failure to timely file such notice will constitute a waiver of the right of appeal. The notice of appeal and/or request for a hearing should be sent to:

Lobbyist Registration Office
111 W. Madison Street
Pepper Building, G68
Tallahassee, FL 32399

If the fine is not paid or appealed within the 30 day time period, pursuant to section 11.045(d)(d)7., F.S., all registrations of lobbyists who are partners, owners, officers or employees of the lobbying firm that fails to timely pay a fine are automatically suspended until the fine is paid or waived, and the Office shall promptly notify all affected principals, the President of the Senate, and the Speaker of the House of Representatives of any suspension or reinstatement. Additionally, pursuant to Rule 1.5(7)(a), Joint Rules of the Florida Legislature, all lobbyists who are partners, owners, officers or employees of a lobbying firm are jointly and severally liable for any outstanding fine owed by a lobbying firm.

Do not reply to this email as it is generated automatically and electronically and cannot accept electronic replies.

Email Detail

Resolve / Add comment

To: antitrust1@outlook.com; Firm Detail
(/Admin/RegistrationMaintenance/FirmDetailView/1570)
Subject: Nonpayment of Assessed Fine
Date Sent: 9/24/2022 6:00:06 AM
Body: TO: Keystone/ Golden State Strategies
FROM: Executive Branch Lobbyist Registration
DATE: 09/24/2022
RE: Notification of Unpaid Assessed Fine after No Appeal

A notice of assessed fine for failure to timely file your 2022 Quarter 1 compensation report for Keystone/ Golden State Strategies was sent to you on, 08/24/2022. The letter notified you of your assessed fine and right to appeal or dispute the assessed fine. You did not appeal that notice, and as of the date of this letter, we have not received your payment of the assessed fine of \$ 5,000.00.

Payment of the assessed fine can be made online at the Lobbyist Registration and Compensation Reporting system available at this link: <https://floridalobbyist.gov/>. If payment is not received within 30 days of the date of this letter, this matter will be turned over to the Department of Financial Services, which may assign the collection of such fine to a collection agent.

Please contact this office if you have questions concerning this matter or wish to make arrangements to pay the assessed fine.

Please contact the Lobbyist Registration Office at (850) 922-4990 or help@floridalobbyist.gov if you have questions concerning this matter or wish to make arrangements to pay the assessed fine.

Forward Email

New recipient email address

Close

Keystone/ Golden State Strategies - Firm Detail

[Back to list](#)

This report was submitted to the Lobbyist Registration Office on 9/26/2022 2:47:36 PM Eastern Time.

Reporting Period

January 01, 2022 - March 31, 2022 Executive Branch Lobbying

Firm Information

Keystone/ Golden State Strategies
116 Pine St
202
Harrisburg, PA 17101-1250
(717) 559-0500

Firm Lobbyist

Daskalakis, Dimitri

Principals and Compensation

Principal	Information	Compensation
Big Trak Technologies LLC	800 Bush River Rd C Columbia SC 29210-7586 (803) 661-6450	\$0.00

Prime Contractor Firms

Prime Contractor Firm

Firm Information

Operating Principal

Principal Information

Total Compensation

Total Compensation: \$0.00

Certification

I hereby certify to the veracity and completeness of the information herein; that no reportable compensation has been omitted; and that no officer or employee of this lobbying firm has made an expenditure in violation of Section 112.3215, F.S.

Senior Partner Dimitri Daskalakis, Senior Partner

[Back to list](#)

Contact Us

Lobbyist Registration Office
111 West Madison Street Room G68
Tallahassee, Florida 32399
Phone: (850) 922-4990
FAX: (850) 921-5345
help@floridalobbyist.gov (<mailto:help@floridalobbyist.gov>)

Related Websites

- [myfloridahouse.gov](http://www.myfloridahouse.gov/) (<http://www.myfloridahouse.gov/>)
- [flsenate.gov](http://www.flsenate.gov/) (<http://www.flsenate.gov/>)
- [Commission on Ethics](http://www.ethics.state.fl.us/) (<http://www.ethics.state.fl.us/>)
- [Online Sunshine](http://www.leg.state.fl.us/) (<http://www.leg.state.fl.us/>)
- [NAICS Codes](https://www.census.gov/naics/) (<https://www.census.gov/naics/>)
- [Public Service Commission Nominating Council \(PSCNC\)](http://www.leg.state.fl.us/cgi-bin/View_Page.pl?File=index.cfm&Directory=committees/joint/pscnc/&Tab=committees/) (http://www.leg.state.fl.us/cgi-bin/View_Page.pl?File=index.cfm&Directory=committees/joint/pscnc/&Tab=committees/)

Help / FAQ

- [FAQs for Lobbyists before The Florida Legislature \(/LobbyistInformation/FAQsLegislative\)](#)
- [FAQs for Lobbyists before Executive Branch Agencies \(/LobbyistInformation/FAQsExecutive\)](#)
- [Application User Guide \(/reports/LRCR_User_Guide.pdf?cp=0.606225965734416\)](#)

[SSL Certificates \(https://www.digicert.com/ssl-certificate.htm\)](https://www.digicert.com/ssl-certificate.htm)