

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

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

Executive Branch Appeal No. L22-002
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 second 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 second quarter of 2022 was August 14, 2022.

3. On July 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 August 14, 2022, at 11:59 p.m. EST.

4. On August 9, 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 August 14, 2022, at 11:59 p.m. EST.

5. On August 15, 2022, Appellant was sent an email notification advising the firm of its failure to timely file its second quarter compensation report and further stating that an automatic fine had begun to accrue.

6. On August 19, 2022, a Commission representative left two phone messages for Appellant, indicating the deadline for filing its second quarter compensation report had passed and that a fine of \$50 per day had begun to accrue.

7. On September 16, 2022, the same Commission representative left two more messages for Appellant, again indicating the deadline for filing the second quarter compensation report had passed and that a fine was accruing.

8. On September 23, 2022, a representative from Appellant's firm contacted the Commission and indicated he had been sick, and that their firm's administrator had passed away. Appellant's representative was informed that a fine was accruing regarding the second quarter compensation report.

9. Three days later, on September 26, 2022, Appellant filed its second quarter compensation report.

10. That same day, 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

11. The amount of fine automatically assessed against Appellant was \$2,150.

12. On October 25, 2022, Appellant timely filed an appeal concerning the fine that it had accrued regarding the second quarter compensation report.

13. In its appeal, Appellant states as grounds that it engaged in no lobbying activity and received no compensation for lobbying during the second quarter of 2022, that several within the firm had been diagnosed with long COVID syndrome, and that the firm's administrator had been ill and passed away on June 26, 2022. In subsequent correspondence, Appellant indicates the emails sent by the Commission regarding the filing requirement likely went into a spam mailbox and were automatically deleted after fourteen days had elapsed. In addition, Appellant states that—due to COVID-related health issues for key personnel, including extreme fatigue, possible lung fibrosis, and recurring breathing issues, as well as the passing of the firm's administrator—it had to essentially shut down during the second quarter of 2022, and no replacement for the former administrator was hired during that time.

Conclusions of Law

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

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.

15. 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."

16. 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.

17. 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."

18. While Appellant claims it conducted no lobbying activity and received no compensation for lobbying during the second quarter of 2022, these reasons fail to provide a basis for waiver, given that the statute concerning compensation reports requires quarterly reporting even if no compensation was received (Section 112.3215(5(a))1.c., Florida Statutes). However, Appellant's claim that it had to essentially shut down its business due to the passing of its administrator and the serious health issues experienced by personnel does provide a basis for waiver. We note Appellant states its administrator passed away on June 26, 2022, which was over a month-and-a-half before the compensation report was due on August 14, 2022. Appellant explains, though, that no replacement was hired due to the serious health issues of others in the office, and confirms the administrator who passed was the individual most closely involved in

preparing and filing the compensation reports. Based on the representations of Appellant that the passing of the administrator continued to affect the firm during the time in which the compensation report was due, as well as the health concerns of others in the office, the Commission finds Appellant has demonstrated that its failure to timely file the second 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 \$2,150.

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: Thursday, December 01, 2022 9:08 AM
To: Schafer, Grayden
Subject: Correspondence

From: Schafer, Grayden
Sent: Tuesday, November 01, 2022 2:16 PM
To: 'Jim Daskalakis' <antitrust1@outlook.com>
Subject: Appeal

Mr. Daskalakis:

Hope you are having a good afternoon. You and I corresponded a few weeks ago about the appeal from the fine pertaining to the filing of the **first** quarter lobbyist compensation report for Keystone/Golden State Strategies.

I have just been assigned your firm's appeal concerning the **second** quarter report, and I have a few questions about it. If you would—as before—please provide your answers in writing by replying to this email, and let me know if you need to have any questions clarified.

Again, these questions pertain to the **second** quarter report, which was due on August 14, 2022, and which your firm filed on September 26, 2022.

1. Prior to the deadline of August 14, 2022, did you or the firm request any extensions concerning the deadline for the second quarter report?
2. It appears several emails were sent prior to the deadline of August 14, 2022, encouraging your firm to timely file the report. These emails were sent on July 1, 2022, and August 9, 2022, to antitrust1@outlook.com. Did you receive them before the deadline? If not you, do any other members of your firm check that email address, and could they have received them prior to the deadline?
3. In the event that the emails in #2 were timely received, what action—if any—was taken concerning them?
4. In your appeal, you indicate your firm's administrator had passed away on June 26, 2022. I believe you and I corresponded about this in your appeal of the first quarter fine, and you indicated the administrator was closely involved in preparing and filing the compensation reports. That being said, please provide further information about how this affected the firm's ability to timely file the second quarter compensation report, which was not due until almost two months later.
5. You indicate in your appeal that Long Term COVID Syndrome prevented the firm from timely filing the second quarter compensation report. Please provide further information about how this affected the firm's ability to file the second quarter report.

Thank you,

Gray Schafer
Assistant General Counsel

From: Schafer, Grayden
Sent: Tuesday, November 08, 2022 9:59 AM
To: 'Jim Daskalakis' <antitrust1@outlook.com>
Subject: Needed Information

Mr. Daskalakis:

I am an attorney from the Florida Ethics Commission. A week ago, I sent you a list of questions—including below—pertaining to your firm's appeal of a fine pertaining to the untimely filing of the **second** quarter lobbyist compensation report here in Florida. I am resending the questions today as I have not heard back from you. I have also left several voicemail messages for you. Please provide a response to these questions by two weeks from today—**November 22, 2022**. If we have not heard from you by that date, your appeal will be processed using the information that you have already provided.

These questions pertain to the **second** quarter report, which was due on August 14, 2022, and which your firm filed on September 26, 2022. If you would, please provide your answers in writing through a reply to this email.

1. Prior to the deadline of August 14, 2022, did you or the firm request any extensions concerning the deadline for the second quarter report?
2. It appears several emails were sent prior to the deadline of August 14, 2022, encouraging your firm to timely file the report. These emails were sent on July 1, 2022, and August 9, 2022, to antitrust1@outlook.com. Did you receive them before the deadline? If not you, do any other members of your firm check that email address, and could they have received them prior to the deadline?
3. In the event that the emails in #2 were timely received, what action—if any—was taken concerning them?
4. In your appeal, you indicate your firm's administrator had passed away on June 26, 2022. I believe you and I corresponded about this in your appeal of the first quarter fine, and you indicated the administrator was closely involved in preparing and filing the compensation reports. That being said, please provide further information about how this affected the firm's ability to timely file the second quarter compensation report, which was not due until almost two months later.
5. You indicate in your appeal that Long Term COVID Syndrome prevented the firm from timely filing the second quarter compensation report. Please provide further information about how this affected the firm's ability to file the second quarter report.

Thank you,

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

From: Jim Daskalakis <antitrust1@outlook.com>
Sent: Monday, November 21, 2022 10:32 AM

To: Schafer, Grayden <SCHAFER.GRAYDEN@leg.state.fl.us>

Subject: Re: Appeal

Hi Mr. Schafer; the answers are as follows:

1. No extensions were sought, as noted in appeal #1 we have had zero activity and received no remuneration of any kind.
2. The emails in question may have gone to spam and would have been auto deleted after 14 days. Only Mr. Dasho and I have had access the account - I have brought in an IT person ensure all emails containing .state and or .gov go to a designated box in that account to prevent recurrence.
3. Same answer as #2.
4. The combination of Mr. Dasho's passing and my recurring health issues had resulted in a de facto shut down of all activity
5. Due to an uncertain prognosis surrounding long covid recovery , I could not in good conscience hire a replacement for Mr. Dasho. Nor could I ask clients to stay on when I could not do anything for them given recurring issues with the Covid induced 'brain fog' ; extreme fatigue and possible lung fibrosis as indicated by x/ ray and reoccurring breathing issues.

Murphy-Bunton, Karen

From: Murphy-Bunton, Karen
Sent: Tuesday, October 25, 2022 12:18 PM
To: Schafer, Grayden
Cc: Zuilkowski, Steven; Stillman, Kerrie
Subject: Keystone/ Golden State Strategies 2022 Quarter 2 Appeal Received

Gray:

LRO received a timely appeal today related to Keystone/ Golden State Strategies late filing their Quarter 2 Compensation Report. The report was due on August 14, 2022 and filed on September 26, 2022. The assessed fine is \$2150.

I have two copies of the appeal request and history of all Quarter 2 communication efforts ready to deliver.

Karen Murphy-Bunton

Lobbyist Registration Office
Claude Pepper Building
111 West Madison Street, G-68
Tallahassee, Florida 32399
Phone: 850-717-0483

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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Email Detail

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

Subject: Reminder to File Compensation Report

Date Sent: 7/1/2022 6:00:15 AM

Body: **COMPENSATION REPORT FILING DEADLINE**

Lobbying firms must file their Executive branch quarterly compensation report(s) electronically for the quarter April 01 - June 30, 2022, no later than 11:59 pm EST on 8/14/2022.

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

Subject: Second Reminder to File Compensation Report

Date Sent: 8/9/2022 6:00:09 AM

Body: **COMPENSATION REPORT FILING DEADLINE**

Lobbying firms must file their Executive branch quarterly compensation report(s) electronically for the quarter April 01 - June 30, 2022, no later than 11:59 pm EST on 8/14/2022.

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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To: antitrust1@outlook.com; Firm Detail
(/Admin/RegistrationMaintenance/FirmDetailView/1570)
Subject: Notification of Failure to File Lobbying Firm Compensation Report
Date Sent: 8/15/2022 6:00:08 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 07/01/2022 and the second on 08/09/2022. Your Executive quarterly compensation report, which was due on 8/14/2022, 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

Lobbyist called @ 2:27 PM. Covered the pressing issue of the deadline to appeal the Q.1 assessed "capped" fine (which is today, 9/23). I also told him he is accruing a fine for not filing the required report for Q.2. Directed him to file the report for Q.2 and follow the instructions in the assessed fine email for Q.2.

ryan.patty

09/23/2022
4:35 pm

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 3:56 pm
10:13 a.m. LVM 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. Two emails were sent on 8/24/2022. If anyone needs assistance filing reports, paying fine or appealing, call 850-922-4990. Also, Q2 reports are past due, the fine as of today is \$3,300 and accruing at \$50 per day, per report.	karenmb	09/16/2022 10:39 am
10:10 a.m. LVM 717-559-0500 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. Two emails were sent on 8/24/2022 to this effect. If anyone needs assistance filing the reports, paying the fine or appealing, call 850-922-4990. Also, Q2 reports are past due, the fine as of today is \$3,300 and accruing at \$50 per day, per report.	karenmb	09/16/2022 10:26 am
Called 717-559-0500 & 202-403-4375. Left detailed voicemail message. The deadline to file comp reports for Q2 was Aug 14. As the firm's report has not been filed, the fine to date is \$500 (\$50 per day for each late day). LRO is glad to assist with filing the reports for Q2 as well as Q1.	ryan.patty	08/24/2022 11:56 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 3:16 pm

Email Detail

Resolve / Add comment

To: antitrust1@outlook.com; Firm Detail
(/Admin/RegistrationMaintenance/FirmDetailView/1570)
Subject: Notification of Assessed Fine
Date Sent: 9/26/2022 2:50:10 PM
Body: Keystone/ Golden State Strategies:

Your Executive branch quarterly compensation report, due on 08/14/2022, was not filed until 9/26/2022. According to Section 112.3215(5)(d)1., F.S., you are assessed a fine of \$50 per day for each day the report was late. Your lobbying firm is fined in the amount of \$2,150.00, which is \$50 per day per report for each late day of 43 days.

Pursuant to Section 112.3215(5)(d)3., F.S., such fine must be paid within 30 days of this 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 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 of this Notification of Assessed Fine being electronically mailed to you. The lobbying firm shall notify this Office of his or her 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 hearing should be sent to:

Lobbyist Registration Office
111 West Madison Street
Pepper Building, G68
Tallahassee, FL 32399
(850) 922-4990

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
Called 717-559-0500 & spoke to L @ 2:02 p.m. "He came in to the office today & we were number 2 on his list." Intends to appeal Q2 (Apr 1-Jun 30) Executive & Legislative Branch late filing of compensation reports. Reminded him 2x the deadline is 10/26 & to specify this relates to Q2 Executive & Legislative Branch. He confirmed our email address. Reminded him 9/26 Notification of Assessed Fine emails contain instructions. He will have appeal to us today.	karenmb	10/21/2022 2:33 pm
Left voicemail message to call Patty Ryan immediately. This call is urgent. I provided both office phone numbers (850-922-4990 & 850-717-0481).	ryan.patty	10/19/2022 11:01 am
FL LRO calling as courtesy re: 10/26 deadline to pay/appeal late filing of Q2 Exec & Leg Branch Reports. See two emails "Notice of Fine" sent 9/26 for instructions. Deadline 10/26. Exec Branch fine \$2,150 & Leg \$2150 late filing Q2 4/1-6/30. For assistance logging in to firm account & paying fine, call. For appeal, specify pertains to "Executive Branch" & "Legislative Branch" Q2 comp reports & state unusual circumstances. Call for help.	karenmb	10/14/2022 10:50 am

Keystone/ Golden State Strategies - Firm Detail

[Back to list](#)

This report was submitted to the Lobbyist Registration Office on 9/26/2022 2:50:10 PM Eastern Time.

Reporting Period

April 01, 2022 - June 30, 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/>)
- Online Sunshine (<http://www.leg.state.fl.us/>)
- NAICS Codes (<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/)

Murphy-Bunton, Karen

From: Jim Daskalakis <antitrust1@outlook.com>
Sent: Tuesday, October 25, 2022 3:27 AM
To: Florida Lobbyist
Subject: Appeal of Fines

> We are appealing both the legislative and regulatory assessments and the underlying failure to file compensation reports for Legislative and separately for the Regulatory Branch the Second Quarter of 2022. We had no activity or compensation during the period ; were very limited in travel due to what has been diagnosed as Long Covid Syndrome in any and our firm administrator had been ill and passed away on 6/26/22 Dimitri Daskalakis

>
Sent from my iPhone