

Mr. Plotkin, stated that he had been in contact with Mrs. Beth Dillaha of Winter Park and had obtained the money for the mail piece from her residence where she had left it for him to pick up.

Contact was made with Ms. Cindy Bonham, Winter Park City Clerk who verified that Mrs. Dillaha had not registered as a Political Committee or Electioneering Communications Organization and had not filed any reports.

I located an expense from the campaign of Bonnie Jackson to Printmeisters in an amount of approximately \$6,000.00. and made contact with Mr. Bob Lanier again to verify that this was for a completely separate mailer that had nothing to do with the mailer in question dealing with Sarah Sprinkel.

Contact with Mrs. Dillaha verified her involvement in setting the stage for the piece to be produced and mailed but made it clear to me that her intentions were to keep the total expense to less than \$5,000.00. The reason for this was that she was under the impression that anything less than \$5,000.00 would not have to be reported, because Florida Statutes require an "Electioneering Communications Organization" (ECO) to file reports if expenses are more than \$5,000.00 in a single calendar year.

Mrs. Dillaha also stated that it was her desire for the people that paid for the mailer to remain anonymous.

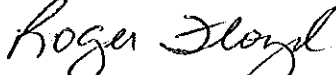
I then contacted Mr. Bill Cowles, Orange County Supervisor of Elections and briefly explained the scenario above. It was the belief by Mr. Cowles and staff that because the amount collected and expended for the mailer was more than \$500.00, the group that collected and or expended the money should have registered as a "Political Committee" and filed reports with the Winter Park City Clerk.

Further review of the statutes relating to this section (F.S.S. 106.03) appear to contain language indicating that any violation of this section to be non criminal and complaints pertaining to a suspected violation should be directed to the Division of Elections.

I have informed Mrs. Dillaha that she may still be able to register as a Political Committee and file the required reports before the deadline of June 11<sup>th</sup>, 2011, but that she would need to contact the City Clerk in Winter Park to determine if that is still an option.

At this point, I have concluded any further investigation into this matter and recommend that if the required reports and registrations are not completed, and the complainant wants to move forward, that he be directed to contact the Florida Division of Elections.

Respectfully,



Roger Floyd, Detective Supervisor  
Office of State Attorney  
Ninth Judicial Circuit of Florida  
407-836-1119