

REPORT OF INVESTIGATION



Complaint Number 21-184

NOTICE CONCERNING CONFIDENTIALITY

This report of investigation concerns an alleged violation of Chapter 112, Part III, Florida Statutes, or other breach of public trust under provisions of Article II, Section 8, Florida Constitution. The Report and any exhibits may be confidential (exempt from the public records law) pursuant to Section 112.324, Florida Statutes, and Chapter 34-5, F.A.C., the rules of the Commission on Ethics. Unless the Respondent has waived the confidentiality in writing, this report will remain confidential until one of the following occurs: (1) the complaint is dismissed by the Commission; (2) the Commission finds sufficient evidence to order a public hearing; or (3) the Commission orders a public report as a final disposition of the matter. *See Section 112.3215, Florida Statutes, regarding executive branch lobbying matters and confidentiality.

STATE OF FLORIDA
COMMISSION ON ETHICS
Post Office Drawer 15709
Tallahassee, Florida 32317-5709

REPORT OF INVESTIGATION

TITLE: CYNTHIA LYNN HOWARD
Member - Board of Governors
Florida Workers' Compensation Joint
Underwriting Association, Incorporated
Sarasota, Florida

COMPLAINT NO.: 21-184
Exhibits A through C

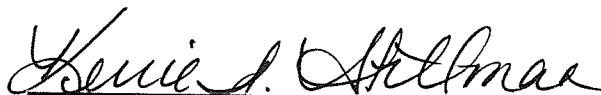
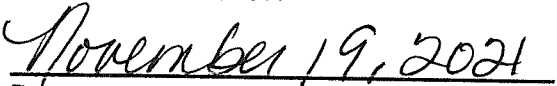
INVESTIGATED BY:


Kathleen Mann

Distribution:

Commission on Ethics
Respondent
Advocate
File

Releasing Authority:


Kerrie J. Stillman
Executive Director

Date

* * * *

**REPORT OF INVESTIGATION
COMPLAINT NO. 21-184**

(1) The Respondent, Cynthia Lynn Howard, serves as an appointed member of the Board of Governors (Board) of the Florida Workers' Compensation Joint Underwriting Association, Inc. (FWCJUA), a position that requires the annual filing of a "Statement of Financial Interests" (CE Form 1).

(2) The Respondent failed or refused to file a 2018 CE Form 1 within 60 days of September 3, 2019, the date automatic fines of \$25 per day began to accrue under Section 112.3145(8)(g), Florida Statutes, for the 2018 Form year. As of November 2, 2019, the Respondent accrued the maximum fine (\$1,500) authorized under Section 112.3145(8)(g), Florida Statutes, regarding the 2018 CE Form 1.

(3) The Respondent also failed or refused to file a 2019 CE Form 1, within 60 days of September 1, 2020, the date automatic fines of \$25 per day began to accrue under Section 112.3145(8)(g), Florida Statutes, for the 2019 Form year. As of October 31, 2020, the Respondent accrued the maximum fine (\$1,500) authorized under Section 112.3145(8)(g) regarding the 2019 CE Form 1.

(4) Pursuant to Section 112.3145(9)(c), Florida Statutes, if a person holding public office or public employment fails or refuses to file an annual statement for any year in which the person received notice from the Commission on Ethics (Commission) regarding the failure to file and has accrued the maximum automatic fine authorized under Section 112.3145(8)(g), regardless of whether the fine imposed was paid or collected, the Commission shall initiate an investigation and conduct a public hearing without receipt of a complaint to determine whether the person's failure to file was willful.

(5) FWCJUA Executive Director and Financial Disclosure Coordinator, Laura Torrence, stated via email that the Respondent attended all 11 FWCJUA Board of Governors meetings in 2019, and, out of a total of 11 meetings in 2020, she only missed one. Ms. Torrence said that Ms. Howard's term expires on June 30, 2023.

2018 CE Form 1 Investigative Findings

(6) All correspondence from the Commission to the Respondent pertaining to the 2018 CE Form 1 filing was mailed to the Respondent's United States Postal Service (USPS) address at P.O. Box 780013, Orlando, FL 32878-0013. The Respondent confirmed via telephone that this is the business address of her consulting company.¹

(7) On May 17, 2019, the Commission mailed the Respondent an official "Memorandum," containing a blank 2018 CE Form 1 and information regarding the Respondent's obligation to file financial disclosure (composite Exhibit A, page A1).

¹ Commission correspondence and relevant notices are attached as composite Exhibit A.

- (8) On May 30, 2019, FWCJUA's Ms. Torrence, sent Board members a reminder bulletin via email to complete and file a 2018 CE Form 1 no later than July 1, 2019 (composite Exhibit B, pages B1 and B2).²
- (9) On July 23, 2019, the Commission mailed the Respondent a "Delinquency Notice" dated July 24, 2019, by certified mail. The notice was signed for, however, the signature is not legible (composite Exhibit A, pages A2 through A4).
- (10) On August 20, 2019, the Commission mailed the Respondent a courtesy postcard, to remind her of her obligation to file a 2018 CE Form 1, and to inform the Respondent about potential fines if the Form is not timely filed (composite Exhibit A, page A5).
- (11) On September 6, 2019, the Commission mailed the Respondent a "Courtesy Notice of Fines Accruing," informing the Respondent that an automatic fine of \$25 per day was accruing as the 2018 CE Form 1 had not been received by the Commission.
- (12) On February 4, 2020, the Commission levied a \$1,500 fine against the Respondent.
- (13) On February 11, 2020, the Commission sent the Respondent a "Notice of Assessment of Automatic Fine," by certified mail, to the Respondent's P.O. Box address. The mailing indicated the Respondent had accrued the maximum fine of \$1,500, and included a notice of the right to appeal the fine (composite Exhibit A, pages A6 through A8).
- (14) On February 24, 2020, the USPS confirmed delivery of the certified mail to the Respondent's P.O. Box address, and the Respondent signed as the recipient of the mail (composite Exhibit A, page A9).
- (15) On April 13, 2021, the Commission received the Respondent's "Appeal of Automatic Fine for Form Year 2018." The Respondent provided a narrative stating that beginning in the spring of 2019, until the end of 2020, she "suddenly became solely responsible for the care of [her] ill elderly parents ... this involved managing their medical, physical, and legal affairs." As a result, she wrote, "some of [her] personal responsibilities were suspended or addressed late." Additionally, she wrote, her father passed away in December 2020, and she mistakenly mailed her 2019 CE Form 1 to her own agency (FWCJUA) rather than to the Commission.³ The Respondent's completed 2018 CE Form 1 was attached to the appeal documents.
- (16) On April 27, 2021, the Respondent's 2018 CE Form 1 was received by the Commission.
- (17) On September 15, 2021, the Commission denied the Respondent's appeal.⁴

² A copy of all communications from the FWCJUA referenced in this investigation for both the 2018 and 2019 Form years, are attached as composite Exhibit B.

³ In the narrative attached to the Respondent's appeal of the automatic fine for the 2018 Form year, the Respondent referenced her 2019 CE Form 1 as being mailed to the wrong agency.

⁴ Commission on Ethics Final Order No. 21-024.

(18) On November 9, 2021, the Respondent paid the \$1,500 fine in full.

2019 CE Form 1 Investigative Findings

(19) All correspondence from the Commission to the Respondent pertaining to the 2019 CE Form 1 Form was mailed to the Respondent's USPS address at P.O. Box 780013, Orlando, FL 32878-0013.⁵

(20) On May 18, 2020, the Commission mailed the Respondent an official "Memorandum," containing a blank 2019 CE Form 1 and information regarding the Respondent's obligation to file financial disclosure (composite Exhibit C, page C1).

(21) On May 29, 2020, Ms. Torrence, sent Board members a reminder bulletin via email to complete and file a 2019 CE Form 1 no later than July 1, 2020 (composite Exhibit B, pages B3 and B4).

(22) On July 30, 2020, the Commission sent the Respondent a "Delinquency Notice" by certified mail. The mail was returned to the Commission on September 16, 2020, marked as "unclaimed" (composite Exhibit C, pages C2 through C4).

(23) On August 11, 2020, Ms. Torrence sent an email to the Respondent alerting her that the Commission had not received her "financial disclosure filing," and urged her to "file at [her] earliest convenience with the Commission[.]" The Respondent replied to the email on the same day, and wrote, "will do, [thank you] for the reminder (composite Exhibit B, pages B5 and B6)."

(24) On August 20, 2020, the Commission mailed the Respondent a courtesy postcard as a reminder of the obligation to file a 2019 CE Form 1, and to inform the Respondent about potential fines if the Form is not timely filed (composite Exhibit C, page C5).

(25) On September 8, 2020, the Commission sent the Respondent a "Courtesy Notice of Fines Accruing," indicating an automatic fine of \$25 per day was accruing as the 2019 CE Form 1 had not been received by the Commission.

(26) On December 21, 2020, FWCJUA Administration Manager, Kathy Coyne, wrote an email⁶ to the Respondent indicating the Respondent mailed her financial disclosure form to the wrong agency, advising her to send the Form to the address on the "attached bulletin" and to "the address on page 2 of the [F]orm (composite Exhibit B, page B7)."

(27) On March 16, 2021, the Commission levied a \$1,500 against the Respondent, and the Commission sent the Respondent a "Notice of Assessment of Automatic Fine," via certified

⁵ Commission correspondence and relevant notices are attached as composite Exhibit C.

⁶ The email does not specify to which Form year Ms. Coyne is referring, as both the 2018 and 2019 CE Form 1s had not been received by the Commission at that point in time.

mail, to the Respondent's P.O. Box. The mailing indicated the Respondent had accrued the maximum fine of \$1,500, and included a notice of the right to appeal the fine (composite Exhibit C, pages C6 through C8).

(28) On April 5, 2021, the USPS confirmed its delivery of the certified mail to the Respondent's P.O. Box. The mail was signed for, however, the "Signature of Recipient" is not known (composite Exhibit C, page C9).

(29) On April 13, 2021, the Commission received the Respondent's 2019 CE Form 1.

(30) On April 13, 2021, the Commission received the Respondent's "Appeal of Automatic Fine for Form Year 2019." The Respondent cited the same issues regarding her ill, elderly parents that she expressed in her appeal of the fine for the 2018 Form year. Additionally, she wrote, the COVID-19 pandemic presented additional limitations and obstacles to her filing her 2019 CE Form 1.

(31) On September 15, 2021 the Commission denied the Respondent's appeal.⁷

(32) On November 9, 2021, the Respondent paid the \$1,500 fine in full.

Interview with the Respondent

(33) The Respondent confirmed she has filed financial disclosure with the Commission since 2015. The Respondent confirmed she accrued a \$50 fine for untimely filing her 2017 CE Form 1 and paid the fine in full by credit card on February 10, 2020.

(34) The Respondent was unable to recall receiving any 2018 or 2019 CE Form 1 correspondence from the Commission, but does not deny receiving such correspondence. The Respondent did not specifically recall receiving an email bulletin from her agency (FWCJUA), intending to remind her to file financial disclosure. She acknowledged receiving ethics training, and confirmed that a part of the training includes a discussion of the obligation to file financial disclosure.

(35) The Respondent explained that during the time she spent at her parents' home, caring for them, she often had someone else pick up her mail. The Respondent did not recall if she personally signed for the certified mail, however, she does not dispute that it was received. The Respondent said in addition to the burden of caring for her parents, she was also caring for her severely disabled granddaughter.

(36) The Respondent timely filed her 2020 CE Form 1, which was received by the Commission on April 13, 2021.

END OF REPORT OF PRELIMINARY INVESTIGATION

⁷ Commission on Ethics Final Order No. 21-026.

EXHIBIT A

EXHIBIT A

Guy W. Norris
Chair
Kimberly Bonder Rezanka
Vice Chair
Jason David Berger
Daniel Brady, Ph.D.
Antonio Carvajal
JoAnne Leznoff
F. Shields McManus



State of Florida
COMMISSION ON ETHICS
P.O. Drawer 15709
Tallahassee, Florida 32317-5709

325 John Knox Road
Building E, Suite 200
Tallahassee, Florida 32303

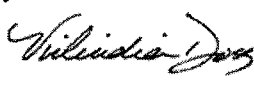
Virilindia Doss
Executive Director

C. Christopher Anderson, III
*General Counsel/
Deputy Executive Director*

(850) 488-7864 Phone
(850) 488-3077 (FAX)
www.ethics.state.fl.us

"A Public Office is a Public Trust"

MEMORANDUM

TO: State Officers and Specified State Employees
FROM: Virilindia Doss, Executive Director 
DATE: May 17, 2019
RE: Financial Disclosure (Form 1, Statement of Financial Interests—2018)

Enclosed is a Form 1, Statement of Financial Interests, to complete and return in order to satisfy your obligation to file financial disclosure for 2018. The mailing label on the form lists the public position that requires you to file.

WHY WAS I SENT THIS FORM?

Persons serving as of December 31, 2018 are required to file this year. *Even if you left the position during 2019 you are required to file disclosure for the year 2018 on this form.*

If you think you were sent this form in error, contact the financial disclosure coordinator for your agency, who has given us your name based on your position and responsibilities. In order to remove your name from the official list, the agency coordinator must submit documentation to our office. To find your agency's coordinator go to our website, www.ethics.state.fl.us, and click on the "Financial Disclosure" tab.

WHEN TO FILE: On or before Monday, July 1, 2019

WHERE TO FILE: Florida Commission on Ethics
P.O. Drawer 15709, Tallahassee, FL 32317-5709
or
325 John Knox Road, Building E, Suite 200, Tallahassee, FL 32303

HAS THE ETHICS COMMISSION RECEIVED MY FORM? Beginning June 1, 2019, to see if your form has been received, visit www.ethics.state.fl.us, and click on the "Financial Disclosure" tab. Please allow at least five business days for our office to receive your form and post the date received.

FAILURE TO FILE the annual disclosure form by September 1 triggers automatic fines of \$25 for each late day. In addition, by law, the Commission on Ethics must initiate investigations of delinquent filers in certain circumstances. This can result in your being removed from your public office or employment. See Section 112.3145(8)(c), Florida Statutes.

Persons with disabilities or handicaps who need assistance or reasonable accommodation to complete this form should contact us at the above address or telephone number. If you are hearing or speech impaired, please contact us by using the Florida Relay Service, which can be reached at 1-800-955-8771 (TTY).

Al

Kimberly Bonder Rezanka
Vice Chair
Jason David Berger
Daniel Brady, Ph.D.
Antonio Carvajal
John Grant
JoAnne Leznoff
F. Shields McManus
William "Willie" N. Meggs



State of Florida
COMMISSION ON ETHICS
P.O. Drawer 15709
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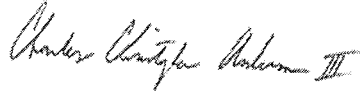
C. Christopher Anderson, III
*Executive Director/
General Counsel*

Kerrie J. Stillman
Deputy Executive Director

(850) 488-7864 Phone
(850) 488-3077 (FAX)
www.ethics.state.fl.us

"A Public Office is a Public Trust"

DELINQUENCY NOTICE

TO: State Officers and Specified State Employees
FROM: Charles Christopher Anderson, III, Executive Director 
DATE: July 24, 2019
SUBJECT: Financial Disclosure (Form 1, Statement of Financial Interests -- 2018)

Our records show that you were sent a financial disclosure packet and advised of the July 1st deadline for filing Form 1, Statement of Financial Interests, for the year 2018, but that you have not yet filed this disclosure with our office. **If you believe that you have filed or that you are not required to file, please contact our office immediately.**

For persons who have not filed by July 1st, a grace period is in effect until September 3, 2019 and no action based upon the failure to file by July 1st will be taken against you if you file the statement by September 3rd. **If the statement is not filed by September 3rd, a fine of \$25 for each day late will be imposed, up to a maximum penalty of \$1,500 (60 days late).** In addition, pursuant to law, the Commission on Ethics must initiate investigations of delinquent filers in certain circumstances. This can result in your being removed from your public office or employment. See Section 112.3145(9)(c), Florida Statutes, formerly Section 112.3145(8)(c), Florida Statutes.

Enclosed is another copy of the Form 1 for you to complete and return by September 3, 2019. The form lists the public position that requires you to file. **Persons serving as of December 31, 2018 are required to file this year. Even if you left the position noted on the form during 2019, you are required to file disclosure for the year 2018 on this form.** (If you left your position during 2019, you also may be required to file a Form 1F, Final Statement of Financial Interests, covering a portion of the year 2019--see the instructions on Form 1, page 2.)

Please return the completed form, including signature and date (on page 2), to:

Florida Commission on Ethics,
P.O. Drawer 15709, Tallahassee, FL 32317-5709

or

Scan ONLY as a PDF document (with any attachments) and email to CEForm1@leg.state.fl.us

Instructions for completing this form are attached at pages 3-6 of Form 1. Any questions regarding the instructions on the form should be directed to our office at (850) 488-7864, toll free (800) 262-8824 or by email disclosure@leg.state.fl.us.

ACCOMMODATIONS: Persons with disabilities or handicaps who need assistance or reasonable accommodation to complete this form should contact us at the above address or telephone number. If you are hearing or speech impaired, please contact us by using the Florida Relay Service, which can be reached at 1-800-955-8771 (TTY).

A2

Mail Piece Details



[Print this page](#)

Recipient Address

CYNTHIA LYNN HOWARD
PO BOX 780013
ORLANDO, FL 32878-0013

Record / Case Number:
259656

Return Address

STATE OF FLORIDA
COMMISSION ON ETHICS
PO DRAWER 15709
TALLAHASSEE, FL 32317-5709

Entry Point ZIP:
32317

Mail Piece Information

Tracking Number: 92148901066154000140812262

Date Created: 07/23/2019 02:14:47 PM

Mail Class: USPS First Class Mail

Special Services: Certified Mail
Return Receipt Electronic

Memo: --

Created By: Kimberly Holmes - Commission on Ethics

Signature Information

Signed For By: CYNTHIA LYNN HOWARD
Signature Status: Available ([Click Here](#))

*Having issues viewing the signature file?
Make sure you are using the latest version of Adobe Acrobat Reader*

Tracking Information

Mailed, July 23, 2019, 02:14:47 PM, TALLAHASSEE,FL 32317
Reminder To Schedule Redelivery Of Your Item
Pre-Shipment Info Sent To Usps, Usps Awaiting Item, July 23, 2019, 12:00:00 AM
Pre-Shipment Info Sent Usps Awaits Item, July 23, 2019, 01:36:00 PM, TALLAHASSEE,FL 32317
Accepted At Usps Origin Facility, July 24, 2019, 07:27:00 PM, TALLAHASSEE,FL 32317
Origin Acceptance, July 24, 2019, 07:27:00 PM, TALLAHASSEE,FL 32317
Arrived At Usps Regional Origin Facility, July 24, 2019, 08:42:00 PM
Processed Through Usps Facility, July 24, 2019, 08:42:00 PM, TALLAHASSEE,FL 32301
Departed Usps Regional Facility, July 24, 2019, 09:33:00 PM
Depart Usps Facility, July 24, 2019, 09:33:00 PM, TALLAHASSEE,FL 32301
Arrived At Usps Regional Facility, July 25, 2019, 11:55:00 AM
Processed Through Usps Facility, July 25, 2019, 11:55:00 AM, ORLANDO,FL 32862
Processed Through Usps Facility, July 25, 2019, 05:07:00 PM, ORLANDO,FL 32862
Departed Usps Regional Facility, July 25, 2019, 08:58:00 PM
Depart Usps Facility, July 25, 2019, 08:58:00 PM, ORLANDO,FL 32862
Arrived At Unit, July 26, 2019, 05:39:00 AM, ORLANDO,FL 32828
Arrival At Unit, July 26, 2019, 05:39:00 AM, ORLANDO,FL 32828
Available For Pickup, July 26, 2019, 05:55:00 AM, ORLANDO,FL 32878
Available For Pickup, July 26, 2019, 05:55:00 AM, ORLANDO,FL 32878
Reminder To Schedule Redelivery, July 31, 2019, 03:10:00 AM, ORLANDO,FL 32878
Delivered, August 03, 2019, 10:22:00 AM, ORLANDO,FL 32878



Date Produced: 08/05/2019

THE MAIL GROUP INC - 1 / CONFIRM DELIVERY INC:

The following is the delivery information for Certified Mail™/RRE item number 9214 8901 0661 5400 0140 8122 62. Our records indicate that this item was delivered on 08/03/2019 at 10:22 a.m. in ORLANDO, FL 32878. The scanned image of the recipient information is provided below.

Signature of Recipient :

Signature of Recipient: [Handwritten signature]

Address of Recipient :

Address of Recipient: PO Box 780013

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

The customer reference information shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Reference ID: 92148901066154000140812262
259656
CYNTHIA LYNN HOWARD
PO Box 780013
Orlando, FL 32878-0013

A4

**URGENT REMINDER!
YOU MUST ACT NOW!**

Earlier this year, you were notified of your obligation to file a CE Form 1, Statement of Financial Interests, for the year ending December 31, 2018. The grace period for filing this form will expire on September 3, 2019 at 5 p.m., and according to our records, you still have not filed your CE Form 1.

Pursuant to State law, an automatic fine of \$25 per day for each day late (up to a maximum fine of \$1,500) will be assessed against you if your CE Form 1 is not received by September 3, 2019. Failure to file can result in removal from public office or employment. Please file your CE Form 1 immediately!

| September 2019 | | | | | | |
|----------------|-----|-----|-----|-----|-----|-----|
| SUN | MON | TUE | WED | THU | FRI | SAT |
| 1 | 2 | 3 | 4 | 5 | 6 | 7 |
| 8 | 9 | 10 | 11 | 12 | 13 | 14 |
| 15 | 16 | 17 | 18 | 19 | 20 | 21 |
| 22 | 23 | 24 | 25 | 26 | 27 | 28 |
| 29 | 30 | | | | | |

If you have ANY questions, please contact
State of Florida
Commission on Ethics
(800) 262-8824 or (850) 488-7864.

BEFORE THE
STATE OF FLORIDA
COMMISSION ON ETHICS

In re **Cynthia Lynn Howard**
 Board Member
 Board of Governors
 FL Workers Comp Joint Underwriting Association

PID#: 259656

NOTICE OF ASSESSMENT OF AUTOMATIC FINE

The Commission on Ethics hereby gives notice of an assessment of a fine against you pursuant to Section 112.3145(8)(g), Florida Statutes, due to your failure to timely file your 2018 CE Form 1, Statement Of Financial Interests. Under the law, your 2018 CE Form 1, Statement of Financial Interests, was due by July 1, 2019. The law provided for a penalty-free grace period extending the due date to September 3, 2019. After that date, you accrued fines of \$25.00 per day for each day your financial disclosure was late, up to the maximum fine of \$1,500.00 (60 days late), pursuant to Section 112.3145(8)(g), Florida Statutes.

Inasmuch as your 2018 CE Form 1 has not been filed with the Commission on Ethics within the 60 days of the grace period date (September 3, 2019), you have accrued the maximum fine amount of \$1,500.00. This fine must be paid to the Commission on Ethics within 30 days of the date of this notice unless you appeal the fine to the Commission. The Commission has the authority to consider the appeal and waive the fine in whole or in part if your failure to file on time was due to "unusual circumstances" surrounding the failure to file. Unless the fine is successfully appealed, the Commission is required to investigate public officers and employees who receive the maximum \$1,500 fine, to determine whether their failure to file was willful. The penalty for willfully failing to file disclosure is removal from public office or employment.

HOW TO APPEAL

1. Read these instructions carefully before submitting your appeal.
2. **LEGAL AUTHORITY:** Appeals are governed by Section 112.3145(8)(g)3, Florida Statutes, and Commission Rule 34-8.215, Florida Administrative Code.
3. **FORMAT:** Your appeal must be in writing and mailed to Florida Commission on Ethics, P. O. Drawer 15709, Tallahassee, FL 32317-5709, or delivered to Florida Commission on Ethics, 325 John Knox Road, Building E, Suite 200, Tallahassee, FL 32303. The appeal may take the form of a letter or you may use the appeal form included in this mailing. The appeal form also is available at the Commission's website: www.ethics.state.fl.us. Click on "Financial Disclosure" and then the link to the sample appeal form.
4. **DUE DATE:** Your appeal must be received by the Commission on Ethics on or before **March 12, 2020**. **NOTE:** Failure to timely file an appeal will constitute a waiver of your right to appeal and will result in the entry of a default order against you.
5. **UNUSUAL CIRCUMSTANCES:** An appeal must demonstrate that you submitted your CE Form 1 after the extended due date because of "unusual circumstances." "Unusual circumstances" is defined in Commission Rule 34-8.215(4), Florida Administrative Code, as "uncommon, rare, or sudden events over which the reporting individual had no control and which directly result in the failure to act in accordance with the filing requirements." Therefore, circumstances that allowed for time to take steps necessary to file on time do not constitute "unusual circumstances" that will allow the Commission to waive the fine. You have the burden to establish "unusual circumstances." Your appeal must specifically state the circumstances that led to your not filing by September 3, 2019, and must include any documentation or evidence supporting your appeal, such as:
 - a. **SICKNESS/INJURY:** a statement from attending physician, including dates and nature of the illness or injury;
 - b. **LACK OF NOTICE (WRONG ADDRESS):** documentation that you did not reside at the address to which notice was sent;

- c. **LACK OF NOTICE (ABSENCE FROM HOME):** documentation establishing the period of time of your absence covering the notification period;
- d. **CLAIM OF TIMELY FILING OF FINANCIAL DISCLOSURE:** (1) an affidavit from you attesting under oath or affirmation that you filed your financial disclosure and your recollection of when and how you filed and (2) a copy of a certified mail receipt and/or a copy of the completed form which was filed. If you have witnesses to your filing, we also will need an affidavit from each witness. NOTE: A claim of having filed the CE Form 1F for the current year does not satisfy the CE Form 1 filing requirement or excuse a late filing;
- e. **LEFT PUBLIC POSITION BEFORE DECEMBER 31, 2018:** confirmation of your last date of office or employment by your former agency, showing the last date to be before December 31, 2018; or
- f. **UNCLAIMED CERTIFIED MAIL:** if delinquency notice was addressed correctly but not received, you must explain why.
6. **YOUR RIGHT TO A HEARING:** You have the right to have your appeal heard by the Commission and to appear before the Commission at the hearing, but, to exercise this right, you must specifically request a hearing in your appeal. If you do not request a hearing, you will waive your right to a hearing, the Commission will determine the outcome of your appeal based upon the written record (including the documentation you provide and any documentation in your case file), and you will receive no further notice until after the Commission decides your appeal.

FAILURE TO PAY FINE OR FILE APPEAL WITHIN 30 DAYS

If you do not timely file an appeal or pay the assessed fine within 30 days of this Notice, a default order will be entered against you and the Commission will take the steps provided by law to collect the fine, including:

- Referral to the CFO of the Department of Financial Services, if you are a salaried state officer or employee, for withholding of a portion of your salary until the fine is satisfied; or
- Referral to your agency's governing body for withholding of a portion of your salary until the fine is satisfied;
- Referral to a collection agency, which can seek garnishment of your wages; and/or
- An additional civil penalty, not limited by this automatic fine, may be imposed if your disclosure statement is filed more than 60 days late and a complaint is filed against you pursuant to Section 112.324, Florida Statutes.

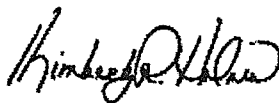
Please contact our office if you have any questions about this matter.

CERTIFICATE OF MAILING

I certify that a copy of the foregoing Notice of Assessment of Automatic Fine was furnished to:

Cynthia Lynn Howard
Po Box 780013
Orlando, FL 32878 -0013

by Certified Mail on this Tuesday, February 11, 2020.



KIMBERLY R. HOLMES
Program Administrator

Florida Commission on Ethics
P. O. Drawer 15709
Tallahassee, FL 32317-5709

-or-

Florida Commission on Ethics
325 John Knox Road, Building E, Ste. 200
Tallahassee, FL 32303

Tel.: (850) 488-7864
Fax: (850) 488-3077
Email: disclosure@leg.state.fl.us

Mail Piece Details



Print this page

Recipient Address

CYNTHIA LYNN HOWARD
PO BOX 780013
ORLANDO, FL 32878-0013

Record / Case Number:
259656

Return Address

STATE OF FLORIDA
COMMISSION ON ETHICS
PO DRAWER 15709
TALLAHASSEE, FL 32317-5709

Entry Point ZIP:
32317

Mail Piece Information

Tracking Number: 92148901066154000148215805

Date Created: 02/11/2020 08:35:41 AM

Mail Class: USPS First Class Mail

Special Services: Certified Mail
Return Receipt Electronic

Memo: --

Created By: Kimberly Holmes - Commission on Ethics

Signature Information

Signed For By: CYNTHIA LYNN HOWARD
Signature Status: Available ([Click Here](#))

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Make sure you are using the latest version of Adobe Acrobat Reader*

Tracking Information

Mailed, February 11, 2020, 08:35:41 AM, TALLAHASSEE,FL 32317
Pre-Shipment Info Sent To Usps, Usps Awaiting Item, February 11, 2020, 12:00:00 AM
Pre-Shipment Info Sent Usps Awaits Item, February 11, 2020, 07:47:00 AM, TALLAHASSEE,FL 32317
Accepted At Usps Origin Facility, February 11, 2020, 06:31:00 PM, TALLAHASSEE,FL 32317
Origin Acceptance, February 11, 2020, 06:31:00 PM, TALLAHASSEE,FL 32317
Arrived At Usps Regional Origin Facility, February 11, 2020, 07:46:00 PM
Processed Through Usps Facility, February 11, 2020, 07:46:00 PM, TALLAHASSEE,FL 32301
Departed Usps Regional Facility, February 11, 2020, 11:27:00 PM
Depart Usps Facility, February 11, 2020, 11:27:00 PM, TALLAHASSEE,FL 32301
Arrived At Usps Regional Facility, February 12, 2020, 09:13:00 AM
Processed Through Usps Facility, February 12, 2020, 09:13:00 AM, ORLANDO,FL 32862
Processed Through Usps Facility, February 12, 2020, 05:41:00 PM, ORLANDO,FL 32862
Departed Usps Regional Facility, February 12, 2020, 08:59:00 PM
Depart Usps Facility, February 12, 2020, 08:59:00 PM, ORLANDO,FL 32862
Arrived At Unit, February 13, 2020, 07:55:00 AM, ORLANDO,FL 32828
Arrival At Unit, February 13, 2020, 07:55:00 AM, ORLANDO,FL 32828
Available For Pickup, February 13, 2020, 07:55:00 AM, ORLANDO,FL 32878
Available For Pickup, February 13, 2020, 07:55:00 AM, ORLANDO,FL 32878
Reminder To Schedule Redelivery, February 18, 2020, 03:21:00 AM, ORLANDO,FL 32878
Delivered, February 21, 2020, 01:26:00 PM, ORLANDO,FL 32828



Date Produced: 02/24/2020

THE MAIL GROUP INC - 1 / CONFIRM DELIVERY INC:

The following is the delivery information for Certified Mail™/RRE item number 9214 8901 0661 5400 0148 2158 05. Our records indicate that this item was delivered on 02/21/2020 at 01:26 p.m. in ORLANDO, FL 32828. The scanned image of the recipient information is provided below.

Signature of Recipient :

A handwritten signature in black ink, appearing to read "Cynthia Lynn Howard".

A handwritten address in black ink, appearing to read "Cynthia Lynn Howard".

Address of Recipient :

PO BOX 780013
ORLANDO, FL 32878-0013

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

The customer reference information shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Reference ID: 92148901066154000148215805
259656
CYNTHIA LYNN HOWARD
PO Box 780013
Orlando, FL 32878-0013

A9

EXHIBIT B

EXHIBIT B

FWCJUA Financial Disclosure Notification

Kathy Coyne

To: Bridgett A. Shelby Hurn (BHurn@foley.com) ; Charlie Clary ;
Claude Revels (clauderevels1@gmail.com) ; Cynthia Howard ;
Dana S Green (dana.green@myfloridacfo.com) ; James Ward ; Maida, Thomas ;
Nick Paquette (npaquette@foley.com) ; Rob deViere (RDeviere@ICWGROU.com) ;
Robert Moore (robertmoore2841@gmail.com) ; Sandra Starnes (Sandra.Starnes@floi.com) ;
Steve Solomon (steve@workcomppartners.com) ; tkoval@fcci-group.com

CC: Dave Webber ; Laura S. Torrence ; Michael K. Cleary

Sent On: Thursday, May 30, 2019 12:33:21 PM

Archived On: Thursday, May 30, 2019 12:33:50 PM

Identification Code: eml:4d563cf9-00e0-471e-9db1-9fccb1759fb9-2147423635

Folders: Sent Items

Attachments: [Bulletin 19-16 Financial Disclosure Notification.pdf \(24 KB\)](#)

Please see attached.

Thank you,

Kathy Coyne

Administration Manager

FWCJUA

TEL: 941.378.7408

FAX: 941.487.2523

Email: kcoyne@fwcjua.com

FWCJUA

**Florida Workers Compensation
Joint Underwriting Association, Inc.**

P.O. Box 48957, Sarasota, FL 34230-5957

• Tel (941) 378-7400 • Fax (941) 378-7405 • www.fwcjua.com

VIA EMAIL

BOARD OF GOVERNORS BULLETIN 19-16

TO: FWCJUA Board of Governors
FROM: Laura S. Torrence, Executive Director
DATE: May 30, 2019
RE: **NOTIFICATION OF DUTY TO COMPLY WITH
SECTION 112.345, FLORIDA STATUTES**

Pursuant to section 627.311(5)(m), Florida Statutes, I am notifying you that as an appointed member of the FWCJUA Board of Governors, or as an Officer or Senior Manager of the FWCJUA that you have a duty to comply with the reporting requirements of section 112.345, Florida Statutes. FORM 1, STATEMENT OF FINANCIAL INTERESTS is the financial disclosure form that you are required to file no later than July 1 of each year with both the Commission on Ethics as indicated on the form as well as with OIR as indicated below.

Ms. Joan Batten
Financial Disclosure Coordinator
Florida Office of Insurance Regulation
200 E. Gaines Street
Tallahassee, FL 32399-4206
Phone: 850-413-5041
Fax: 850-922-2543
Email: joan.batten@flor.com

If you have not already received FORM 1, STATEMENT OF FINANCIAL INTERESTS – 2018 directly from the Florida Commission on Ethics, you should expect to receive it in the next few days. Please complete and file this form with both the Commission on Ethics and OIR no later than July 1, 2019 in order to satisfy your obligation to file financial disclosure for the past year, given your affiliation with the FWCJUA.

Please **DO NOT** provide a copy of your completed form to the FWCJUA.

c: Tom Maida, *General Counsel*
Sandra Starnes, *Florida Office of Insurance Regulation*

BOARD OF GOVERNORS: Charlie Clary, *Chair*; Claude Revels, *Vice Chair*;
Rob deViere; Cynthia Howard; Tom Koval; Robert Moore; Steve Solomon; James Ward

B2

FWCJUA Financial Disclosure Notification

Kathy Coyne

To: Bridgett A. Shelby Hurn (BHurn@foley.com) ; Charlie Clary ;
Claude Revels (clauderevels1@gmail.com) ; Cynthia Howard ;
Dana S Green (dana.green@myfloridacfo.com) ;
Debra Cerre-Ruedisili (debra.ruedisili@fcbifund.com) ; Greg Jaynes ; James Ward ; Maida, Thomas
; Nick Paquette (npaquette@foley.com) ; Rick Piedra (rpiedra@fcci-group.com) ;
Rob deViere (RDeviere@ICWGROU.com) ;
Robert Moore - Acentria Insurance (bob.moore@acentria.com) ;
Tasha Carter (tasha.carter@myfloridacfo.com)

CC: Laura S. Torrence ; Michael K. Cleary ; Dave Webber

Sent On: Friday, May 29, 2020 9:54:29 AM

Archived On: Friday, May 29, 2020 9:55:00 AM

Identification Code: eml:5509bb0e-9426-4d17-a26e-114b62d8f9df-2147450306

Folders: Sent Items

Attachments: [Bulletin 20-16 Financial Disclosure Notification.pdf \(24 KB\)](#)

Please see attached.

Thank you,

Kathy Coyne

Administration Manager

FWCJUA

TEL: 941.378.7408

FAX: 941.487.2523

Email: kcoyne@fwcjua.com

FWCJUA

**Florida Workers Compensation
Joint Underwriting Association, Inc.**

P.O. Box 48957, Sarasota, FL 34230-5957

• Tel (941) 378-7400 • Fax (941) 378-7405 • www.fwcjua.com

VIA EMAIL

BOARD OF GOVERNORS BULLETIN 20-16

TO: FWCJUA Board of Governors & Senior Managers
FROM: Laura S. Torrence, Executive Director
DATE: May 29, 2020
RE: **NOTIFICATION OF DUTY TO COMPLY WITH
SECTION 112.345, FLORIDA STATUTES**

Pursuant to section 627.311(5)(m), Florida Statutes, I am notifying you that as an appointed member of the FWCJUA Board of Governors, or as an Officer or Senior Manager of the FWCJUA that you have a duty to comply with the reporting requirements of section 112.345, Florida Statutes. FORM 1, STATEMENT OF FINANCIAL INTERESTS is the financial disclosure form that you are required to file no later than July 1 of each year with both the Commission on Ethics as indicated in the "filing instructions" on page 2 of the form as well as with OIR as indicated below.

Ms. Joan Batten
Financial Disclosure Coordinator
Florida Office of Insurance Regulation
200 E. Gaines Street
Tallahassee, FL 32399-4206
Phone: 850-413-5041
Fax: 850-922-2543
Email: joan.batten@fioir.com

If you have not already received FORM 1, STATEMENT OF FINANCIAL INTERESTS – 2019 directly from the Florida Commission on Ethics, you should expect to receive it in the next few days. Please complete and file this form with both the Commission on Ethics and OIR no later than July 1, 2020 in order to satisfy your obligation to file financial disclosure for the past year, given your affiliation with the FWCJUA.

Please **DO NOT** provide a copy of your completed form to the FWCJUA.

c: Tom Maida, *General Counsel*
Greg Jaynes, *Florida Office of Insurance Regulation*

BOARD OF GOVERNORS: Charlie Clary, *Chair*; Claude Revels, *Vice Chair*; Tasha Carter;
Debra Cerre-Ruedisili; Rob deViere; Cynthia Howard; Robert Moore; Rick Piedra; James Ward

B4

Commission on Ethics & OIR Financial Disclosure Filing

Laura S. Torrence

To: Howard, Cindy
CC: Kathy Coyne
Sent On: Tuesday, August 11, 2020 2:41:24 PM
Archived On: Tuesday, August 11, 2020 2:42:21 PM
Identification Code: eml:505fe5b6-641f-4667-920b-8f0f57f8ed9e-2147463197
Folders: Inbox

Hi Cindy,

Commission on Ethics has advised that it has yet to receive your financial disclosure filing. Please make sure to file at your earliest convenience with the Commission on Ethics as well as with OIR. Thanks!

Laura S. Torrence

Executive Director

FWCJUA

Tel: 941-378-7401

Fax: 941-487-2525

E-Mail: ltorrence@fwcjua.com

Re: Commission on Ethics & OIR Financial Disclosure Filing

Howard, Cindy

To: Laura S. Torrence
CC: Kathy Coyne
Sent On: Tuesday, August 11, 2020 2:42:40 PM
Archived On: Tuesday, August 11, 2020 2:43:51 PM
Identification Code: eml:505fe5b6-641f-4667-920b-8f0f57f8ed9e-2147463195
Folders: Inbox

→ Will do. Ty for the reminder. ←

On Tue, Aug 11, 2020, 2:41 PM Laura S. Torrence <L.Torrence@fwcjua.com> wrote:

Hi Cindy,

Commission on Ethics has advised that it has yet to receive your financial disclosure filing. Please make sure to file at your earliest convenience with the Commission on Ethics as well as with OIR. Thanks!

Laura S. Torrence

Executive Director

FWCJUA

Tel: 941-378-7401

Fax: 941-487-2525

E-Mail: ltorrence@fwcjua.comDownload our new Worker's Comp Rater App by clicking [here](#).

Please connect with us:



CONFIDENTIALITY NOTICE: This e-mail and the transmitted documents contain private, privileged and confidential information belonging to the sender. The information therein is solely for the use of the addressee. If your receipt of this transmission has occurred as the result of an error, please immediately notify us so we can arrange for the return of the documents. In such circumstances, you are advised that you may not disclose, copy, distribute or take any other action in reliance on the information transmitted.

B6

Financial Disclosure

Kathy Coyne

To: Cynthia Howard
Sent On: Monday, December 21, 2020 9:46:16 AM
Archived On: Monday, December 21, 2020 9:46:52 AM
Identification Code: eml:70725861-f95e-4d78-8033-d8195b6d4ce8-2147441623
Folders: Sent Items
Attachments: [Bulletin 20-16 Financial Disclosure Notification.pdf \(24 KB\)](#)

Good morning Cindy,

We received your Statement of Financial Interests in the mail today, but the form doesn't come to us. It has to be sent by you to the address on the attached bulletin, and the address on page 2 of the form. There is an email address for both.

Regards,

Kathy Coyne

Administration Manager

FWCJUA

TEL: 941.378.7408

FAX: 941.487.2523

Email: kcoyne@fwcjua.com

EXHIBIT C

EXHIBIT C

Kimberly Bonder Rezanka
Chair
Daniel Brady, Ph.D.
Vice Chair
Jason David Berger
Antonio Carvajal
Glenton "Glen" Gilzean, Jr.
John Grant
JoAnne Leznoff
F. Shields McManus
William "Willie" N. Meggs



State of Florida
COMMISSION ON ETHICS
P.O. Drawer 15709
Tallahassee, Florida 32317-5709

325 John Knox Road
Building E, Suite 200
Tallahassee, Florida 32303


C. Christopher Anderson, III
Executive Director/
General Counsel

Kerrie J. Stillman
Deputy Executive Director

(850) 488-7864 Phone
(850) 488-3077 (FAX)
www.ethics.state.fl.us

"A Public Office is a Public Trust"

MEMORANDUM

TO: State Officers and Specified State Employees
FROM: Charles Christopher Anderson, III, Executive Director 
DATE: May 18, 2020
RE: Financial Disclosure (Form 1, Statement of Financial Interests—2019)

Enclosed is a Form 1, Statement of Financial Interests, to complete and return in order to satisfy your obligation to file financial disclosure for 2019. The mailing label on the form lists the public position that requires you to file.

WHY WAS I SENT THIS FORM?

Persons serving as of December 31, 2019 are required to file this year. *Even if you left the position during 2020 you are required to file disclosure for the year 2019 on this form.*

If you think you were sent this form in error, contact the financial disclosure coordinator for your agency, who has given us your name based on your position and responsibilities. In order to remove your name from the official list, the agency coordinator must submit documentation to our office. To find your agency's coordinator go to our website, www.ethics.state.fl.us, and click on the "Financial Disclosure" tab.

WHEN TO FILE: On or before Wednesday, July 1, 2020

WHERE TO FILE: Florida Commission on Ethics
P.O. Drawer 15709, Tallahassee, FL 32317-5709
or
325 John Knox Road, Building E, Suite 200, Tallahassee, FL 32303

HAS THE ETHICS COMMISSION RECEIVED MY FORM? Beginning June 1, 2020, to see if your form has been received, visit www.ethics.state.fl.us, and click on the "Financial Disclosure" tab. Please allow at least five business days for our office to receive your form and post the date received.

FAILURE TO FILE the annual disclosure form by September 1 triggers automatic fines of \$25 for each late day. In addition, by law, the Commission on Ethics must initiate investigations of delinquent filers in certain circumstances. This can result in your being removed from your public office or employment. See Section 112.3145(9)(c), Florida Statutes.

Persons with disabilities or handicaps who need assistance or reasonable accommodation to complete this form should contact us at the above address or telephone number. If you are hearing or speech impaired, please contact us by using the Florida Relay Service, which can be reached at 1-800-955-8771 (TTY).

CI

Daniel Brady, Ph.D.
Chair
F. Shields McManus
Vice Chair
Antonio Carvajal
Don Gaetz
Glenton "Glen" Gilzean, Jr.
John Grant
JoAnne Leznoff
William "Willie" N. Meggs
Kimberly Bonder Rezanka



State of Florida
COMMISSION ON ETHICS
P.O. Drawer 15709
Tallahassee, Florida 32317-5709

325 John Knox Road
Building E, Suite 200
Tallahassee, Florida 32303

"A Public Office is a Public Trust"

C. Christopher Anderson, III
*Executive Director/
General Counsel*

Kerrie J. Stillman
Deputy Executive Director

(850) 488-7864 Phone
(850) 488-3077 (FAX)
www.ethics.state.fl.us

DELINQUENCY NOTICE

TO: State Officers and Specified State Employees
FROM: Charles Christopher Anderson, III, Executive Director
DATE: July 30, 2020
SUBJECT: Financial Disclosure (Form 1, Statement of Financial Interests -- 2019)

A handwritten signature in dark ink, appearing to read "Charles Christopher Anderson, III", is written over a horizontal line.

Our records show that you were sent a financial disclosure packet and advised of the July 1st deadline for filing Form 1, Statement of Financial Interests, for the year 2019, but that you have not yet filed this disclosure with our office. **If you believe that you have filed or that you are not required to file, please contact our office immediately.**

For persons who have not filed by July 1st, a grace period is in effect until September 1, 2020 and no action based upon the failure to file by July 1st will be taken against you if you file the statement by September 1st. If the statement is not filed by September 1st, a fine of \$25 for each day late will be imposed, up to a maximum penalty of \$1,500 (60 days late). In addition, pursuant to law, the Commission on Ethics must initiate investigations of delinquent filers in certain circumstances. This can result in your being removed from your public office or employment. See Section 112.3145(9)(c), Florida Statutes.

Enclosed is another copy of the Form 1 for you to complete and return by September 1, 2020. The form lists the public position that requires you to file. **Persons serving as of December 31, 2019 are required to file this year. Even if you left the position noted on the form during 2020, you are required to file disclosure for the year 2019 on this form.** (If you left your position during 2020, you also may be required to file a Form 1F, Final Statement of Financial Interests, covering a portion of the year 2020--see the instructions on Form 1, page 2.)

Please return the completed form, including signature and date (on page 2), to:

Florida Commission on Ethics,
P.O. Drawer 15709, Tallahassee, FL 32317-5709
or

Scan ONLY as a PDF document (with any attachments) and email to CEForm1@leg.state.fl.us

Instructions for completing this form are attached at pages 3-6 of Form 1. Any questions regarding the instructions on the form should be directed to our office at (850) 488-7864, toll free (800) 262-8824 or by email disclosure@leg.state.fl.us.

ACCOMMODATIONS: Persons with disabilities or handicaps who need assistance or reasonable accommodation to complete this form should contact us at the above address or telephone number. If you are hearing or speech impaired, please contact us by using the Florida Relay Service, which can be reached at 1-800-955-8771 (TTY).

Mail Piece Details



Print this page

Recipient Address

CYNTHIA LYNN HOWARD
PO BOX 780013
ORLANDO, FL 32878-0013

Record / Case Number:
259656

Return Address

STATE OF FLORIDA
COMMISSION ON ETHICS
PO DRAWER 15709
TALLAHASSEE, FL 32317-5709

Entry Point ZIP:
32317

Mail Piece Information

Tracking Number: 92148901066154000153073049

Date Created: 07/30/2020 04:07:05 PM

Mail Class: USPS First Class Mail

Special Services: Certified Mail
Return Receipt Electronic

Memo: --

Created By: Kimberly Holmes - Commission on Ethics

Signature Information

Signed For By: Z TURNER

Signature Status: Available (Click Here)

Having issues viewing the signature file?

Make sure you are using the latest version of Adobe Acrobat Reader

Tracking Information

Mailed, July 30, 2020, 04:07:05 PM, TALLAHASSEE,FL 32317

Reminder To Schedule Redelivery Of Your Item

Pre-Shipment Info Sent To Usps, Usps Awaiting Item, July 30, 2020, 12:00:00 AM

Pre-Shipment Info Sent Usps Awaits Item, July 30, 2020, 03:21:00 PM, TALLAHASSEE,FL 32317

Accepted At Usps Origin Facility, July 31, 2020, 05:33:00 PM, TALLAHASSEE,FL 32317

Origin Acceptance, July 31, 2020, 05:33:00 PM, TALLAHASSEE,FL 32317

Arrived At Usps Regional Origin Facility, July 31, 2020, 06:48:00 PM

Processed Through Usps Facility, July 31, 2020, 06:48:00 PM, TALLAHASSEE,FL 32301

Departed Usps Regional Facility, July 31, 2020, 11:12:00 PM

Depart Usps Facility, July 31, 2020, 11:12:00 PM, TALLAHASSEE,FL 32301

In Transit To Next Facility, August 01, 2020, 12:00:00 AM

Arrived At Usps Regional Facility, August 01, 2020, 01:51:00 PM

Processed Through Usps Facility, August 01, 2020, 01:51:00 PM, ORLANDO,FL 32862

Departed Usps Regional Facility, August 01, 2020, 06:17:00 PM

Processed Through Usps Facility, August 01, 2020, 06:17:00 PM, ORLANDO,FL 32862

Departed Usps Regional Facility, August 01, 2020, 10:13:00 PM

Depart Usps Facility, August 01, 2020, 10:13:00 PM, ORLANDO,FL 32862

In Transit, Arriving On Time, August 02, 2020, 12:00:00 AM

Arrived At Unit, August 03, 2020, 08:58:00 AM, ORLANDO,FL 32828

Arrival At Unit, August 03, 2020, 08:58:00 AM, ORLANDO,FL 32828

Available For Pickup, August 03, 2020, 08:59:00 AM, ORLANDO,FL 32878

Available For Pickup, August 03, 2020, 08:59:00 AM, ORLANDO,FL 32878

Reminder To Schedule Redelivery, August 08, 2020, 03:31:00 AM, ORLANDO,FL 32878

Package Return Notice Generated, August 18, 2020, 03:30:00 AM, ORLANDO,FL 32878

Return To Sender Processed, September 09, 2020, 11:49:00 AM, ORLANDO,FL 32828

Return To Sender Processed, September 09, 2020, 11:49:00 AM, ORLANDO,FL 32828

Unclaimed/Being Returned To Sender, September 09, 2020, 11:57:00 AM, ORLANDO,FL 32878

Unclaimed/Being Returned To Sender, September 09, 2020, 11:57:00 AM, ORLANDO,FL 32878

Processed Through Usps Facility, September 09, 2020, 10:25:00 PM, ORLANDO,FL 32862

Departed Usps Regional Facility, September 09, 2020, 11:27:00 PM

Processed Through Usps Facility, September 09, 2020, 11:27:00 PM, ORLANDO,FL 32862

In Transit To Next Facility, September 10, 2020, 12:00:00 AM

Arrived At Usps Regional Origin Facility, September 10, 2020, 12:38:00 PM

Processed Through Usps Facility, September 10, 2020, 12:38:00 PM, TALLAHASSEE,FL 32301

Departed Usps Regional Origin Facility, September 10, 2020, 11:45:00 PM

Processed Through Usps Facility, September 10, 2020, 11:45:00 PM, TALLAHASSEE,FL 32301

In Transit, Arriving Late, September 11, 2020, 12:00:00 AM

C3



Date Produced: 09/17/2020

THE MAIL GROUP INC - 1 / CONFIRM DELIVERY INC:

The following is the delivery information for Certified Mail™/RRE item number 9214 8901 0661 5400 0153 0730 49. Our records indicate that this item was delivered on 09/16/2020 at 10:50 a.m. in TALLAHASSEE, FL 32308. The scanned image of the recipient information is provided below.

Signature of Recipient :

Delivery Section
Zoe Turner
Zoe Turner

Address of Recipient :

15709

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

The customer reference information shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Reference ID: 92148901066154000153073049
259656
CYNTHIA LYNN HOWARD
PO Box 780013
Orlando, FL 32878-0013

C4

**URGENT REMINDER!
YOU MUST ACT NOW!**

Earlier this year, you were notified of your obligation to file a CE Form 1, Statement of Financial Interests, for the year ending December 31, 2019. The grace period for filing this form will expire on September 1, 2020 at 5 p.m., and according to our records, you still have not filed your CE Form 1.

Pursuant to State law, an automatic fine of \$25 per day for each day late (up to a maximum fine of \$1,500) will be assessed against you if your CE Form 1 is not received by September 1, 2020. Failure to file can result in removal from public office or employment. Please file your CE Form 1 immediately!



If you have *ANY* questions, please contact
State of Florida
Commission on Ethics
(800) 262-8824 or (850) 488-7864.

State of Florida
Commission on Ethics
P.O. Drawer 15709
Tallahassee, FL 32317-5709



*Financial Disclosure Grace Period
Expires on September 1, 2020 at 5 p.m.*

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

In re **Cynthia Lynn Howard**
 Board Member
 Board of Governors
 FL Workers Comp Joint Underwriting Association

PID#: 259656

NOTICE OF ASSESSMENT OF AUTOMATIC FINE

The Commission on Ethics hereby gives notice of an assessment of a fine against you pursuant to Section 112.3145(8)(g), Florida Statutes, due to your failure to timely file your 2019 CE Form 1, Statement Of Financial Interests. Under the law, your 2019 CE Form 1, Statement of Financial Interests, was due by July 1, 2020. The law provided for a penalty-free grace period extending the due date to September 1, 2020. After that date, you accrued fines of \$25.00 per day for each day your financial disclosure was late, up to the maximum fine of \$1,500.00 (60 days late), pursuant to Section 112.3145(8)(g), Florida Statutes.

Inasmuch as your 2019 CE Form 1 has not been filed with the Commission on Ethics within the 60 days of the grace period date (September 1, 2020), you have accrued the maximum fine amount of \$1,500.00. This fine must be paid to the Commission on Ethics within 30 days of the date of this notice unless you appeal the fine to the Commission. The Commission has the authority to consider the appeal and waive the fine in whole or in part if your failure to file on time was due to "unusual circumstances" surrounding the failure to file. Unless the fine is successfully appealed, the Commission is required to investigate public officers and employees who receive the maximum \$1,500 fine, to determine whether their failure to file was willful. The penalty for willfully failing to file disclosure is removal from public office or employment.

HOW TO APPEAL

1. Read these instructions carefully before submitting your appeal.
2. **LEGAL AUTHORITY:** Appeals are governed by Section 112.3145(8)(g)3., Florida Statutes, and Commission Rule 34-8.215, Florida Administrative Code.
3. **FORMAT:** Your appeal must be in writing and mailed to Florida Commission on Ethics, P. O. Drawer 15709, Tallahassee, FL 32317-5709, or delivered to Florida Commission on Ethics, 325 John Knox Road, Building E, Suite 200, Tallahassee, FL 32303. The appeal may take the form of a letter or you may use the appeal form included in this mailing. The appeal form also is available at the Commission's website: www.ethics.state.fl.us. Click on "Financial Disclosure" and then the link to the sample appeal form.
4. **DUE DATE:** Your appeal must be received by the Commission on Ethics on or before **April 15, 2021**. **NOTE:** Failure to timely file an appeal will constitute a waiver of your right to appeal and will result in the entry of a default order against you.
5. **UNUSUAL CIRCUMSTANCES:** An appeal must demonstrate that you submitted your CE Form 1 after the extended due date because of "unusual circumstances." "Unusual circumstances" is defined in Commission Rule 34-8.215(4), Florida Administrative Code, as "uncommon, rare, or sudden events over which the reporting individual had no control and which directly result in the failure to act in accordance with the filing requirements." Therefore, circumstances that allowed for time to take steps necessary to file on time do not constitute "unusual circumstances" that will allow the Commission to waive the fine. You have the burden to establish "unusual circumstances." Your appeal must specifically state the circumstances that led to your not filing by September 1, 2020, and must include any documentation or evidence supporting your appeal, such as:
 - a. **SICKNESS/INJURY:** a statement from attending physician, including dates and nature of the illness or injury;

- b. **LACK OF NOTICE (WRONG ADDRESS):** documentation that you did not reside at the address to which notice was sent;
 - c. **LACK OF NOTICE (ABSENCE FROM HOME):** documentation establishing the period of time of your absence covering the notification period;
 - d. **CLAIM OF TIMELY FILING OF FINANCIAL DISCLOSURE:** (1) an affidavit from you attesting under oath or affirmation that you filed your financial disclosure and your recollection of when and how you filed and (2) a copy of a certified mail receipt and/or a copy of the completed form which was filed. If you have witnesses to your filing, we also will need an affidavit from each witness. **NOTE:** A claim of having filed the CE Form 1F for the current year does not satisfy the CE Form 1 filing requirement or excuse a late filing;
 - e. **LEFT PUBLIC POSITION BEFORE DECEMBER 31, 2019:** confirmation of your last date of office or employment by your former agency, showing the last date to be before December 31, 2019; or
 - f. **UNCLAIMED CERTIFIED MAIL:** if delinquency notice was addressed correctly but not received, you must explain why.
6. **YOUR RIGHT TO A HEARING:** You have the right to have your appeal heard by the Commission and to appear before the Commission at the hearing, but, to exercise this right, you must specifically request a hearing in your appeal. If you do not request a hearing, you will waive your right to a hearing, the Commission will determine the outcome of your appeal based upon the written record (including the documentation you provide and any documentation in your case file), and you will receive no further notice until after the Commission decides your appeal.

FAILURE TO PAY FINE OR FILE APPEAL WITHIN 30 DAYS

If you do not timely file an appeal or pay the assessed fine within 30 days of this Notice, a default order will be entered against you and the Commission will take the steps provided by law to collect the fine, including:

- Referral to the CFO of the Department of Financial Services, if you are a salaried state officer or employee, for withholding of a portion of your salary until the fine is satisfied; or
- Referral to your agency's governing body for withholding of a portion of your salary until the fine is satisfied;
- Referral to a collection agency, which can seek garnishment of your wages; and/or
- An additional civil penalty, not limited by this automatic fine, may be imposed if your disclosure statement is filed more than 60 days late and a complaint is filed against you pursuant to Section 112.324, Florida Statutes.

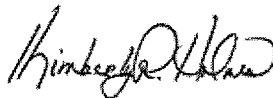
Please contact our office if you have any questions about this matter.

CERTIFICATE OF MAILING

I certify that a copy of the foregoing Notice of Assessment of Automatic Fine was furnished to:

Cynthia Lynn Howard
Po Box 780013
Orlando, FL 32878 -0013

by Certified Mail on this Tuesday, March 16, 2021.



KIMBERLY R. HOLMES
Program Administrator

Florida Commission on Ethics
P. O. Drawer 15709
Tallahassee, FL 32317-5709

-or-

Florida Commission on Ethics
325 John Knox Road, Building E, Ste. 200
Tallahassee, FL 32303

Tel.: (850) 488-7864
Fax: (850) 488-3077
Email: disclosure@leg.state.fl.us

Mail Piece Details



Print this page

Recipient Address

CYNTHIA LYNN HOWARD
PO BOX 780013
ORLANDO, FL 32878-0013

Record / Case Number:
259656

Return Address

STATE OF FLORIDA
COMMISSION ON ETHICS
PO DRAWER 15709
TALLAHASSEE, FL 32317-5709

Entry Point ZIP:
32317

Mail Piece Information

Tracking Number: 92148901066154000160863145

Date Created: 03/16/2021 04:49:17 PM

Mail Class: USPS First Class Mail

Special Services: Certified Mail
Return Receipt Electronic

Memo: --

Created By: Kimberly Holmes - Commission on Ethics

Signature Information

Signed For By: CYNTHIA LYNN HOWARD
Signature Status: Available (Click Here)

*Having issues viewing the signature file?
Make sure you are using the latest version of Adobe Acrobat Reader*

Tracking Information

Mailed, March 16, 2021, 04:49:17 PM, TALLAHASSEE,FL 32317
Reminder To Schedule Redelivery Of Your Item
Pre-Shipment Info Sent To Usps, Usps Awaiting Item, March 16, 2021, 12:00:00 AM
Pre-Shipment Info Sent Usps Awaits Item, March 16, 2021, 04:02:00 PM, TALLAHASSEE,FL 32317
Accepted At Usps Origin Facility, March 17, 2021, 10:15:00 PM, TALLAHASSEE,FL 32317
Origin Acceptance, March 17, 2021, 10:15:00 PM, TALLAHASSEE,FL 32317
Arrived At Usps Regional Origin Facility, March 17, 2021, 11:30:00 PM
Processed Through Usps Facility, March 17, 2021, 11:30:00 PM, TALLAHASSEE,FL 32301
Departed Usps Regional Facility, March 17, 2021, 11:32:00 PM
Depart Usps Facility, March 17, 2021, 11:32:00 PM, TALLAHASSEE,FL 32301
Arrived At Usps Regional Facility, March 18, 2021, 11:50:00 AM
Processed Through Usps Facility, March 18, 2021, 11:50:00 AM, ORLANDO,FL 32862
Departed Usps Regional Facility, March 18, 2021, 09:05:00 PM
Depart Usps Facility, March 18, 2021, 09:05:00 PM, ORLANDO,FL 32862
Departed Usps Regional Facility, March 19, 2021, 05:23:00 PM
Processed Through Usps Facility, March 19, 2021, 05:23:00 PM, ORLANDO,FL 32862
Arrived At Post Office, March 20, 2021, 08:26:00 AM, ORLANDO,FL 32828
Arrival At Unit, March 20, 2021, 08:26:00 AM, ORLANDO,FL 32828
Available For Pickup, March 20, 2021, 08:26:00 AM, ORLANDO,FL 32878
Available For Pickup, March 20, 2021, 08:26:00 AM, ORLANDO,FL 32878
Reminder To Schedule Redelivery, March 25, 2021, 03:01:00 AM, ORLANDO,FL 32878
Package Return Notice Generated, April 04, 2021, 03:08:00 AM, ORLANDO,FL 32878
Delivered, April 05, 2021, 02:38:00 PM, ORLANDO,FL 32828



201

Date Produced: 04/06/2021

THE MAIL GROUP INC - 1 / CONFIRM DELIVERY INC:

The following is the delivery information for Certified Mail™/RRE item number 9214 8901 0661 5400 0160 8631 45. Our records indicate that this item was delivered on 04/05/2021 at 02:38 p.m. in ORLANDO, FL 32828. The scanned image of the recipient information is provided below.

Signature of Recipient :

A handwritten signature in black ink, appearing to be "M. R.", written over a horizontal line.

Address of Recipient :

PO BOX 780013
ORLANDO, FL 32878-0013

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

The customer reference information shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Reference ID: 92148901066154000160863145
259656
CYNTHIA LYNN HOWARD
PO Box 780013
Orlando, FL 32878-0013

C9