

Fulford, Millie

From: Stillman, Kerrie
Sent: Thursday, August 20, 2026 3:56 PM
To: Fulford, Millie
Subject: FW: Congressman Fine
Attachments: fine.ltr.pdf

From: Stillman, Kerrie
Sent: Tuesday, August 18, 2026 11:32 AM
To: rcoates@rcoateslaw.com
Cc: Zuilkowski, Steven <ZUILKOWSKI.STEVEN@leg.state.fl.us>; Stillman, Kerrie <STILLMAN.KERRIE@leg.state.fl.us>
Subject: FW: Congressman Fine

Mr. Coates,

The Chair has denied your request for a continuance.

Sincerely,

KERRIE J. STILLMAN
EXECUTIVE DIRECTOR
FLORIDA COMMISSION ON ETHICS

From: Zuilkowski, Steven <ZUILKOWSKI.STEVEN@leg.state.fl.us>
Sent: Thursday, August 13, 2026 2:59 PM
To: Stillman, Kerrie <STILLMAN.KERRIE@leg.state.fl.us>
Subject: FW: Congressman Fine

See attached.

From: rcoates rcoateslaw.com <rcoates@rcoateslaw.com>
Sent: Thursday, August 13, 2026 2:55 PM
To: Zuilkowski, Steven <ZUILKOWSKI.STEVEN@leg.state.fl.us>
Subject: Re: Congressman Fine

Steven,

As we discussed, attached is a letter from Congressman Fine I received detailing his official travel and related official business on August 28. As he states, he cannot attend the Commission meeting scheduled on such date and his matters must be continued.

Richard E. Coates
Coates Law Firm, PL

115 East Park Avenue
Number 1
Tallahassee, FL 32301
(850) 681-1029

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From: Zuilkowski, Steven <[redacted]@suikowski.com>
Sent: Thursday, August 13, 2026 11:41 AM
To: rcoates rcoateslaw.com <[redacted]@rcoateslaw.com>
Subject:

site:ethics.state.fl.us/Documents/Opinions

Fulford, Millie

From: Stillman, Kerrie
Sent: Thursday, August 20, 2026 4:10 PM
To: Fulford, Millie
Subject: FW: Continuance Request

Millie,

Please scan and file.

Kerrie

From: Jon Philipson <commissionerphilipson@gmail.com>
Sent: Tuesday, August 18, 2026 11:16 AM
To: Zuilkowski, Steven <ZUULKOWSKI.STEVEN@leg.state.fl.us>
Cc: Stillman, Kerrie <STILLMAN.KERRIE@leg.state.fl.us>
Subject: Re: Continuance Request

Thank you, Steve. Based on a review of Mr. Coates' response, the Commission's rules, and a review of the *Masad* matter, the motion is denied.

Mr. Coates has not provided a legal argument based on the Speech or Debate Clause to preclude the proceeding.

Moreover, based on a review of the *Masad* docket, contrary to Mr. Coates' letter, Mr. Coates' client did seek his Chief of Staff to attend the mediation based on his official duties as a Congressman. Specifically, on page 4 of his motion (Doc. 61), Congressman Fine's counsel argued, "given the nature and press of [Congressman Fine's] **official congressional duties described above** (including those that may unexpectedly occur on any particular day) and the attendant prospect that Representative Fine will be required to take periodic breaks during mediation to attend to time-sensitive matters, including consultations with other senior government officials or his staff, allowing for this arrangement would increase the Mediator's ability to conduct uninterrupted and efficient settlement discussions." (emphasis supplied).

Regardless, this matter has been scheduled during Congress' August recess, when the House of Representatives is not in session.

In addition, based on the Commission's procedures, Congressman Fine's physical presence is not required for the Commission to proceed with this matter.

With respect to the *Latham* decision, it is not applicable. It addressed only the applicable standard of proof necessary for commission proceedings. See *Rivera v. Fla. Comm'n on Ethics*, 195 So. 3d 1177, 1180 (Fla.1st DCA 2016) ("[T]he issue in *Latham* was the proper standard of proof in the proceedings before the Commission, not the availability or scope of judicial review of the action taken by the disciplinary official.").

Latham did not address whether the respondent's presence is necessary. In short, *Latham* is not applicable with respect to the Respondent's attendance at the proceeding.

Therefore, based on foregoing and a review of the arguments of counsel and the record, the request for continuance is denied.

All the best,
Jon

On Mon, Aug 17, 2026 at 2:25 PM Zuilkowski, Steven <ZUULKOWSKI.STEVEN@leg.state.fl.us> wrote:

Mr. Chair,

As we discussed, here are the documents from the federal case referenced in my letter to Mr. Coates.

Steve

From: Zuilkowski, Steven
Sent: Monday, August 17, 2026 12:15 PM
To: commissionerphilipsou@gmail.com
Cc: Stillman, Kerrie <STILLMAN.KERRIE@leg.state.fl.us>
Subject: Continuance Request

Mr. Chair,

Attached please find a request for a continuance filed by Richard Coates on behalf of Congressman Randy Fine, my letter back to Mr. Coates asking some clarifying questions, and Mr. Coates's response to my letter. Please let me know how you rule on this continuance request so we may communicate the outcome. I am available to provide you guidance as to our rules, if you need.

Sincerely,

Steven J. Zuilkowski

Deputy Executive Director & General Counsel

Florida Commission on Ethics

P.O. Drawer 15709

Tallahassee, FL 32317-5709

(850) 488-7864

(850) 488-3077 (Fax)

ethics.state.fl.us

Physical address:
325 John Knox Road
Building E, Suite 200
Tallahassee, FL 32303

COATES LAW FIRM, PL
ATTORNEYS AT LAW

RICHARD E. COATES

MASON COATES*

*LICENSED IN FLORIDA AND TENNESSEE

115 EAST PARK AVENUE, SUITE 1
TALLAHASSEE, FLORIDA 32301
(850) 681-1029
FAX: (208) 248-9038

August 17, 2026

FLORIDA
COMMISSION ON ETHICS

AUG 17 2026

RECEIVED

Steven J. Zuilkowski
Deputy Executive Director and General Counsel
Florida Commission on Ethics
325 John Knox Road
Building E, Suite 200
Tallahassee, Florida 32303

VIA EMAIL: ZUILKOWSKI.STEVEN@leg.state.fl.us

Re: Your Letter Dated August 14, 2026

Dear Mr. Zuilkowski:

I am in receipt of your letter referenced above. On behalf of Congressman Fine this letter is in response to your letter. My responses mirror the numbered paragraphs in your letter.

1. Yes, my email to you dated August 13, 2026 together with Congressman Fine's letter to me, which I am attaching again for reference, and outlining the specific reasons for his unavailability, was intended as a request for a continuance for the hearings scheduled for August 28, 2026. This letter is also a continued request for such continuance.
2. Congressman Fine is not making this claim.
3. Regarding this paragraph, Congressman Fine has provided a copy of your letter to the General Counsel of the United States House Representatives so they can assume representation on the question of whether the desires of the Commission obviate Federal Supremacy and overrule the Speech and Debate Clause of the United States Constitution. It is doubtful that a response will be received before 12:00 P.M. today.
4. Unlike Congressman Fine's matters before the Commission on Ethics, the Masad case differs in three fundamental ways. First, Congressman Fine does not have official duties precluding his participation on August 20, as he does on August 28. Second, the Masad matter is directly related to his ongoing official duties as a Member of Congress and he is being represented by the General Counsel of the House of Representatives in

that matter. The Commission's proceedings relate to alleged unofficial conduct. And third, and perhaps most importantly, the Masad proceeding is a civil proceeding that does not, as here, involve a penal proceeding. See *Latham v. Commission on Ethics* 694 So.2d 83(Fla. 1st DCA 1997). Although unable to attend on August 28, 2026 because of official duties, Congressman Fine has the right to appear and defend himself in a penal proceeding such as the present matters.

Moreover, and absent here, any participation by Representative Fine's surrogate in the purely civil mediation proceeding was analyzed and independently approved by the presiding Federal Judge.

We will share commentary from the U.S. House of Representatives relating to Question 3 upon receipt.

If you have any questions, let me know.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard E. Coates", with a stylized flourish at the end.

Richard E. Coates

Cc: Millie Fulford



**Congress of the United States
House of Representatives
Washington, DC 20515**

August 12, 2026

Richard E. Coates
Coates Law Firm, PL
115 East Park Avenue
Number 1
Tallahassee, FL 32301

Dear Mr. Coates,

This letter is to inform you that I will be on official travel to the Pacific Northwest the last week of August in order to conduct official Congressional business with Representative Michael Baumgartner concerning our committee assignments on the Education and Workforce and Foreign Affairs Committees. As such, I am precluded from coming to Tallahassee on August 28th for the scheduled meeting of the Florida Commission on Ethics. Under the Speech or Debate Clause of Article 1, Section 6 of the United States Constitution, any activity by the Florida Commission on Ethics is automatically postponed.

Broadly speaking, this entire matter should cease at the point at which it currently is. The complaint at issue was filed years ago when I was a member of the Florida House of Representatives. The complaint was not filed by a constituent or even a member of the general public, but by an out-of-district perennial Democrat candidate, disgraced former Brevard School Board Member, failed U.S. Senate Candidate, failed Congressional Candidate, and now again a Congressional Candidate in the 8th Congressional District, Jennifer Jenkins, in coordination with her longtime partner, convicted felon Robert Burns.

The entire history of this situation is a travesty.

- 1) **Professional commission staff initially recommended that the “complaint” was legally insufficient for consideration.** Despite that, political appointees to the Commission, in a non-public meeting, overruled professional staff and demanded I be investigated to find some kind of wrongdoing.
- 2) **After completing the investigation, the professional commission advocate from the Attorney General’s office recommended a finding of no probable cause.** Despite that, political appointees again overruled professional staff and demanded I be prosecuted.

As I now serve Congress, I am subject to the oversight of the House Committee on Ethics and my constituents in the six counties I serve have every right to expect that I spend my working hours on the issues important to them, not traveling to Tallahassee for issues that the professionals at the Commission on Ethics have repeatedly said are not legitimate.

Perhaps fortunately, I believe none of the current members of the Commission were serving during the previous three votes of the Commission, and it is my hope that they will remedy this gross injustice and bring an end to this proceeding.

You are authorized to tell the Commission that I am willing to waive my right to attend in person for the sole purpose of the "complaint" being dismissed.

Sincerely,

A handwritten signature in black ink, appearing to read "Randy Fine", with a stylized flourish at the end.

Randy Fine
Member of Congress

Zuilkowski, Steven

From: Zuilkowski, Steven
Sent: Friday, August 14, 2026 10:11 AM
To: 'rcoates rcoateslaw.com'
Cc: Fulford, Millie
Subject: RE: Congressman Fine
Attachments: 260814 letter to richard coates.pdf

Dear Mr. Coates:

I am in receipt of your email from yesterday. Attached please find a letter requesting additional information so that your request for a continuance may be considered by the Chair of the Commission. Please note: the Commission requests that you supply the responses **by August 17 at noon** to allow the Chair to make his determination on your request in a timely manner.

Sincerely,

Steven J. Zuilkowski

Deputy Executive Director & General Counsel

Florida Commission on Ethics

P.O. Drawer 15709

Tallahassee, FL 32317-5709

(850) 488-7864

(850) 488-3077 (Fax)

ethics.state.fl.us

Physical address:

325 John Knox Road

Building E, Suite 200

Tallahassee, FL 32303

From: rcoates rcoateslaw.com <rcoates@rcoateslaw.com>
Sent: Thursday, August 13, 2026 2:55 PM
To: Zuilkowski, Steven <ZUILKOWSKI.STEVEN@leg.state.fl.us>
Subject: Re: Congressman Fine

Steven,

As we discussed, attached is a letter from Congressman Fine I received detailing his official travel and related official business on August 28. As he states, he cannot attend the Commission meeting scheduled on such date and his matters must be continued.

Richard E. Coates
Coates Law Firm, PL
115 East Park Avenue
Number 1
Tallahassee, FL 32301
(850) 681-1029

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Jon M. Philipson
Chair
Joseph Oglesby
Vice Chair
Nicholas X. Duran
Michael H. Hellman
Marty Kerner
Jeremy M. Rodgers
Abbey L. Stewart
Joshua C. Webb



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"

Kerrie J. Stillman
Executive Director

Steven J. Zuilkowski
*Deputy Executive Director/
General Counsel*

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

August 14, 2026

Richard E. Coates, Esq.
Coates Law Firm, PL
115 East Park Avenue
Number 1
Tallahassee, FL 32301
rcoates@rcoateslaw.com

DELIVERED BY EMAIL

Dear Mr. Coates:

As you are already aware, the Commission on Ethics has scheduled a hearing on a matter involving your client at its August 28, 2026 meeting. The Commission is now in receipt of your email and attached letter from your client, received yesterday, August 13, 2026 at 2:58 P.M. To the extent that the email you filed with the Commission references a preference for a continuance, your email is being considered a request for a continuance made on behalf of your client pursuant to Rule 28-106.304, Florida Administrative Code, and will be referred to the Chair of the Commission for consideration. To more easily facilitate the Chair's consideration of your request for a continuance and to perfect his understanding of the matter, the Commission requests additional information and clarification. Please email me responses to the following questions **by 12:00 P.M. on Monday, August 17, 2026**, so that the Chair may rule on the continuance request in a timely manner.

1. Did you intend the email you filed with the Commission to be interpreted as a request for a continuance filed on behalf of your client? If not, please indicate your intention.
2. Please identify any case law or other legal authority that interprets the "Speech and Debate Clause" of the United States Constitution (U. S. Const. Art. I, § 6) as applicable to proceedings concerning a party's alleged conduct occurring before they became a member of the United States Congress.

Letter to Richard E. Coates, Esq.

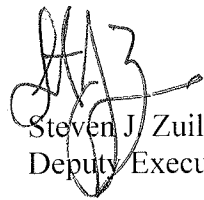
August 14, 2026

Page 2

3. Please identify any case law or other legal authority that interprets the "Speech and Debate Clause" of the United States Constitution as requiring the continuance of a proceeding when a member of Congress and party to the proceeding is unable to attend.
4. The Commission is aware of an ongoing case in the United States District Court for the Middle District of Florida involving your client, in which your client recently allowed his legal representative to attend a motion hearing that your client did not attend. Masad v. Fine, No. 6:26-cv-00442, ECF No. 38 (M.D. Fla. Apr. 21, 2026). Especially relevant to your request for a continuance, there is apparently a mediation scheduled in the case on August 20, 2026—*just a week before the August 28, 2026 Commission on Ethics meeting*—for which your client requested that his Chief of Staff be allowed to appear in his stead as a surrogate with full settlement authority. Masad, ECF No. 61 (M.D. Fla. Aug. 6, 2026). Please distinguish the Masad case from the Commission on Ethics matter with respect to your client's attendance at proceedings by and through a representative.

If you require any clarification on these questions, please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Zuilkowski", with a large, stylized flourish extending from the end of the signature.

Steven J. Zuilkowski
Deputy Executive Director and General Counsel

Fulford, Millie

From: Zuilkowski, Steven
Sent: Friday, August 14, 2026 11:24 AM
To: Fulford, Millie
Subject: FW: Congressman Fine
Attachments: fine.ltr.pdf

From: rcoates rcoateslaw.com <rcoates@rcoateslaw.com>
Sent: Thursday, August 13, 2026 2:55 PM
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Subject: Re: Congressman Fine

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Richard E. Coates
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Sent: Thursday, August 13, 2026 11:41 AM
To: rcoates rcoateslaw.com <rcoates@rcoateslaw.com>
Subject:

site:ethics.state.fl.us/Documents/Opinions



**Congress of the United States
House of Representatives
Washington, DC 20515**

August 12, 2026

Richard E. Coates
Coates Law Firm, PL
115 East Park Avenue
Number 1
Tallahassee, FL 32301

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Randy Fine
Member of Congress