

STATE OF FLORIDA  
COMMISSION ON ETHICS  
P. O. DRAWER 15709, TALLAHASSEE, FLORIDA 32317-5709

COMPLAINT

14-082 ORIGINAL

FLORIDA  
COMMISSION ON ETHICS  
MAY 19 2014  
RECEIVED

1. PERSON BRINGING COMPLAINT:

Name: RAY STEVENS Telephone Number: 386-437-1942

Address: 25 UTIDE CT.

City: PALM COAST, FLORIDA County: FLAGLER Zip Code: 32164

2. PERSON AGAINST WHOM COMPLAINT IS BROUGHT:

Current or former public officer, public employee, candidate, or lobbyist - please use one complaint form for each person you wish to complain against:

Name: BARBARA SUE REVELS Telephone Number: 386-439-3130

Address: P O BOX 434

City: FLAGLER BEACH, FLORIDA County: FLAGLER Zip Code: 32136

Title of office or position held or sought: FLAGLER COUNTY COMMISSIONER, DISTRICT 3

3. STATEMENT OF FACTS:

Please explain your complaint fully, either on the reverse side of this form or on additional sheets, providing a detailed description of the facts and the actions of the person named above. Include relevant dates and the names and addresses of persons whom you believe may be witnesses. If you believe that a particular provision of Article II, Section 8, Florida Constitution (the Sunshine Amendment) or of Part III, Chapter 112, Florida Statutes (the Code of Ethics for Public Officers and Employees) has been violated, please state the specific section(s). Please do not attach copies of lengthy documents; if they are relevant, your description of them will suffice. Also, please do not submit video tapes or audio tapes.

4. OATH

I, the person bringing this complaint, do depose on oath or affirmation and say that the facts set forth in the foregoing complaint and attachments thereto are true and correct to the best of my knowledge and belief.

STATE OF FLORIDA  
COUNTY OF FLORIDA

Sworn to (or affirmed) and subscribed before me  
this 14th day of MAY,  
20 14, by RAY STEVENS

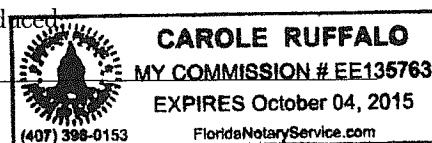
(name of person making statement)

Carole Ruffalo  
(Signature of Notary Public - State of Florida)

(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☒ OR Produced Identification 1  
Type of Identification Produced

Ray Stevens  
SIGNATURE OF COMPLAINANT



**Jurisdiction of the Commission:** The Commission on Ethics has the authority to review and investigate complaints concerning possible breaches of the public trust (violations of the State's ethics laws) by public officers, public employees, and similar persons involved with state and local government in Florida, including Executive Branch lobbyists. Complaints about the actions of Judges should be brought to the Judicial Qualifications Commission, and complaints against attorneys in private practice should be made to The Florida Bar.

**Procedures followed by the Commission:** The Commission follows a three-stage process when it considers complaints.

The first stage is a determination of whether the allegations of the complaint are legally sufficient, that is, whether the complaint indicates a possible violation of any law over which the Commission has jurisdiction. If the complaint is found not to be legally sufficient, the Commission will order that the complaint be dismissed without investigation and all records relating to the complaint will become public at that time.

If the complaint is found to be legally sufficient, the investigative staff of the Commission will begin an investigation. The second stage of the Commission's proceedings involves this investigation of the complaint and a decision by the Commission of whether there is probable cause to believe that there has been a violation of any of the ethics laws. If the Commission finds that there is no probable cause to believe that there has been a violation of the ethics laws, the complaint will be dismissed and will become public at that time.

If the Commission finds that there is probable cause to believe there has been a violation of the ethics laws, the complaint becomes public and enters the third stage of proceedings. The third stage requires that the Commission decide whether the law actually was violated and, if so, what penalty should be recommended. This stage requires a public hearing (trial) at which evidence would be presented.

**Attorney's Fees:** If the complaint is dismissed, the person against whom the complaint is filed can file a petition to have the complainant pay his or her attorney's fees, which will be awarded after a hearing if the Commission finds that the complaint was made with a malicious intent to injure the official's reputation, the complainant knew that the statements made about the official were false or made the statements about the official with reckless disregard for the truth, and the statements were material.

**Confidentiality:** The Commission cannot accept anonymous complaints and cannot keep the identity of the complainant or any witness confidential. A complaint, as well as all of the Commission's proceedings and records relating to the complaint, is confidential and exempt from the public records law either until the person against whom the complaint is made waives confidentiality, or until the complaint reaches a stage in the Commission's proceedings where it becomes public. The Commission's procedures on confidentiality do not govern the actions of the complainant or the person against whom the complaint is made.

**Legal Counsel:** Both the complainant and the person complained against can be represented by legal counsel during the Commission's proceedings.

**Other Information:** More information about the ethics laws and the Commission's responsibilities is available at the Commission's website, [www.ethics.state.fl.us](http://www.ethics.state.fl.us), which contains publications, rules, and other information.

STATE OF FLORIDA

**COMMISSION ON ETHICS**

P. O. DRAWER 15709, TALLAHASSEE, FLORIDA 3217-5709

**COMPLAINT**

*FAILURE TO COMPLY WITH FLORIDA STATUTES  
SEC. 112.3143*

- **FACT 1:** Revels is a County Commissioner in Flagler County District 3
- **FACT 2:** On August 1, 2013 Barbara Revels voted to purchase the old "Flagler Hospital" for \$1.23 Million Dollars from Flagler Crossroads Inc.
- **FACT 3:** Revels is a business associate of Bruce Page at Intracoastal Bank
- **FACT 4:** Bruce Page is an officer in Flagler Crossroads, which sold the old hospital to the County
- **FACT 5:** Bruce Page is CEO of Intracoastal Bank
- **FACT 6:** Barbara Revels failed to file form 8B, Memorandum of Voting Conflict after her vote on August 1, 2013 to buy the old Flagler Hospital from Flagler Crossroads.

**DOCUMENTS:**

- FULL AND PUBLIC DISCLOSURE OF FINANCIAL INTERESTS , January 13, 2013 (Form 6)
- BUYER'S CLOSING DOCUMENTS, BOARD OF COUNTY COMMISSIONERS/FLAGLER CROSSROADS INC.