



Florida Commission on Ethics
P.O. Drawer 15709, Tallahassee, Florida 32317-5709
"A Public Office is a Public Trust"

FLORIDA
COMMISSION ON ETHICS

APR 07 2025

RECEIVED

COMPLAINT

25-094

ORIGINAL

1. PERSON BRINGING COMPLAINT:

Name: Edward Danko Telephone: 214-516-5029
Address: 56 Wasserman Drive
City: Palm Coast County: Flagler State: Florida ZIP: 32164

2. PERSON AGAINST WHOM COMPLAINT IS BROUGHT:

Use a separate complaint form for each person against whom you are filing a complaint.

Name: Michael Norris Telephone: 386-264-9164
Address: 2 Lema Pl
City: Palm Coast County: Flagler State: Florida ZIP: 32137
Title of office or position held or sought: Mayor, Palm Coast, Florida

3. STATEMENT OF FACTS:

Please provide a full explanation of your complaint, describing the facts and the actions of the person named above and why you believe he or she violated the law, and include a statement of how you became aware of these facts. Include relevant dates and the names and addresses of people whom you believe may be witnesses. Please do not submit more than 15 pages, including this form. Please do not submit video or audio tapes, CD, DVDs, flash drives, or other electronic media; such material will not be considered part of the complaint and will be returned.

4. OATH:

I, the person bringing this complaint, do swear or affirm 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 Flagler

Sworn to (or affirmed) and subscribed before me by
means of ☒ physical presence or ☐ online notarization,
this 31 day of March, 2025,
by Edward Danko
(name of person making statement)

Janet Eason
(Signature of Notary Public)

State of Florida
Janet Eason
My Commission HH 581532
Expires 8/12/2028

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

Personally Known _____ OR Produced Identification ☒
Type of Identification Produced: FL DL

COMPLAINT OF ED DANKO

Former Vice-Mayor and City Council Member, Palm Coast, Florida

INTRODUCTION

This complaint is submitted by former Vice-Mayor and City Councilman Ed Danko, in response to a series of unfounded, defamatory, and potentially unlawful actions taken by Palm Coast Mayor Michael "Mike" Norris, both prior to and following his assumption of office. These actions constitute an abuse of power, a violation of state law and City Charter provisions, and an attempt to erode public trust in city governance.

FACTUAL BACKGROUND

Shortly after November 5, 2024, following Election Day, Mayor-Elect Michael Norris attended a standard post-election orientation briefing with senior City of Palm Coast staff, including Acting City Manager Lauren Johnston and City Attorney Jeremiah Blocker of the Douglas Law Firm.

At that meeting, Mayor-Elect Norris directed Attorney Blocker to initiate lawsuits against individuals Norris labeled as his "political enemies." The list included myself, then Vice-Mayor Ed Danko, as well as Mayor David Alfin and Councilman Nick Klufas.

Attorney Blocker appropriately informed Mr. Norris that the City Attorney does not represent the Mayor individually, but rather serves the City of Palm Coast as a corporate entity and takes direction from the full City Council, as prescribed under Article IV, Section 7(a) of the Palm Coast City Charter.

Despite this, Mayor-Elect Norris persisted, demanding legal action without offering any evidence of wrongdoing. Attorney Blocker refused to comply, reminding Mr. Norris of his ethical and legal obligations.

FALSE ACCUSATIONS OF CONSTITUTIONAL AND CHARTER VIOLATIONS

Mayor Norris accused myself, former Mayor Alfin, and Councilman Klufas of violating the U.S. Constitution and Article IV, Section 7(e) of the Palm Coast City Charter by participating in the appointment of Councilman Charles A. Gambaro, Jr. on October 1, 2024. This appointment was made to fill the vacancy created by the resignation of Councilwoman Cathy Heighter.

However, this appointment was both unanimous and lawful, supported by a written legal opinion from City Attorney Marcus Duffy, and conducted in accordance with the City Charter, which grants the City Council authority to fill vacancies as necessary to maintain governance continuity.

Furthermore, there is no basis for claiming that this lawful appointment violated any provision of the U.S. Constitution, particularly as the appointment process was transparent, non-discriminatory, and adhered to procedural due process.

FALSE SUNSHINE LAW ALLEGATIONS

Mayor Norris next alleged that myself, Mayor Alfin, Councilman Klufas, Acting City Manager Johnston, Attorney Duffy, and City Chief of Staff Jason DeLorenzo violated the Florida Sunshine Law, codified at §286.011, Fla. Stat., by allegedly conducting a secret meeting the night prior to the appointment of Councilman Gambaro.

When pressed for evidence, Norris cited only the uncorroborated claim of a "city hall spy," whose identity he refused to disclose. Attorney Blocker again advised Mayor Norris that making criminal accusations without any proof is both reckless and potentially defamatory.

To be clear, no such meeting ever took place, and no evidence has been presented by Mayor Norris to suggest otherwise. The Sunshine Law requires that public meetings be open and noticed, and there is no evidence of any violation of this statute.

ONGOING DEFAMATION AND ABUSE OF POWER

Since assuming office, Mayor Norris has continued to repeat these baseless accusations during public meetings and media interviews. For example:

- On December 3, 2024, during a public council meeting, Norris demanded that Attorney Duffy revise his legal opinion on the Gambaro appointment. Duffy refused, stating that his legal opinion had been rendered in accordance with the law to the previous council. Norris then sought consensus from the Council to force Duffy to change the opinion, which the Council unanimously rejected.
- On March 18, 2025, during another public council meeting, Mayor Norris referred to Councilman Gambaro as an "unelected imp." Councilman Gambaro is a Brigadier General in the U.S. Army Reserve and a former advisor to the President of the United States—statements of this nature degrade the office of the Mayor and disrespect public service.
- On March 20, 2025, during a video interview with *Flagler County Buzz*, Mayor Norris again accused myself, former Mayor Alfin, and former Councilman Klufas of violating the City Charter:

MAYOR NORRIS: *"The last council violated the city charter when they appointed Mr. Gambaro to that position. Any votes that that gentleman makes is illegitimate. Any motions he makes, anything he does, is illegitimate."*

Such statements amount to public defamation, an abuse of the Mayor's public platform, and a willful attempt to delegitimize a lawful appointment and disrupt city governance.

MOTIVE TO DEFLECT INVESTIGATION

On March 11, 2025, the Palm Coast City Council voted to initiate an independent outside investigation into Mayor Norris for alleged violations of the City Charter and for numerous internal HR complaints lodged by city employees.

In what appears to be an attempt to deflect attention from this ongoing investigation, Mayor Norris has escalated his unfounded accusations and public attacks against the prior council and city staff. These actions represent a pattern of retaliation and intimidation that undermines public confidence in local government and may constitute official misconduct under §838.022, Fla. Stat. (abuse of official position).

CONCLUSION

Mayor Michael Norris has demonstrated a pattern of:

- Demanding unlawful legal action without evidence;
- Making baseless accusations against former and current city officials;
- Attempting to coerce city attorneys into altering legal opinions;
- Publicly disparaging a sitting councilmember who is a decorated U.S. military officer; and
- Engaging in conduct designed to mislead the public and interfere with lawful government operations.

His actions appear to violate the Palm Coast City Charter, Florida Sunshine Law, State ethics laws, and may implicate federal constitutional protections relating to due process and freedom from government retaliation.

REQUEST FOR ACTION

I respectfully request that this complaint be formally reviewed by the appropriate oversight authority, whether at the City of Palm Coast, the Florida Commission on Ethics, or other relevant state or federal agencies.

I am prepared to provide sworn testimony and additional documentation as necessary to support this complaint.