



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

FLORIDA
 COMMISSION ON ETHICS

JUN 25 2025

RECEIVED
 ORIGINAL

COMPLAINT
25-157

1. PERSON BRINGING COMPLAINT:

Name: Katherine Biancaniello Telephone: 386-597-3340
 Address: 2434 County Road 304
 City: Bunnell County: Flagler State: FL ZIP: 32110

2. PERSON AGAINST WHOM COMPLAINT IS BROUGHT:

Use a separate complaint form for each person against whom you are filing a complaint.
 Name: Gwendolyn J Lafferty Telephone: 386-503-0514
 Address: 1101 S. Daytona Ave
 City: Flagler Beach County: Flagler State: FL ZIP: 32164
 Title of office or position held or sought: Vice Chair of the PZA zoning board city of Bunnell

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 21ST day of JUNE, 20 25, by KATHERINE BIANCANIELLO (name of person making statement)

[Signature]
 SIGNATURE OF COMPLAINANT

[Signature]
 (Signature of Notary Public)
 Notary Public State of Florida
 Leyla Torres
 My Commission # HH 643159
 Expires 11/17/2028
 (Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known OR Produced Identification
 Type of Identification Produced: Drive license



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CE FORM 50
ETHICS COMPLAINT FORM AND INSTRUCTIONS

Use this form to file an ethics complaint or to file an amendment to an ethics complaint. An ethics investigation can only be initiated by a properly filed complaint, including a statement of facts alleging a possible violation of the ethics laws. Noncompliant or incomplete forms will be returned.

PLEASE NOTE: The Florida Commission on Ethics cannot intervene in your civil or criminal case, nor can we give you legal advice. We do not have jurisdiction to consider complaints against judges or to direct the actions of government agencies. We have no jurisdiction over violations of the Sunshine Law or the Open Meetings Law.

SECTION ONE—Person Bringing Complaint: The person bringing the complaint is known as "the Complainant." Please provide your name, address, and telephone number.

SECTION TWO—Person Against Whom Complaint is Brought: The person against whom the complaint is brought is known as "the Respondent." Provide the name, address, and telephone number of the Respondent, as well as that person's office or the position he or she holds or held, or for which he or she is a candidate. All complaints are confidential and considered independently, so if you are filing a complaint against more than one person, use a separate complaint form for each person.

SECTION THREE—Statement of Facts: On a separate sheet(s) of paper, please provide the following:

- Please explain fully, but as briefly as possible, what the Respondent did that you believe violated the ethics laws of the State of Florida.
- **Please explain how you became aware of these facts** because the Commission may only investigate complaints based on personal knowledge or information other than hearsay.
- Please limit your submission to **15 pages or fewer**, and do not submit voluminous exhibits or copies of statutes; if your complaint is deemed legally sufficient, it will be investigated and at that point, the investigator will obtain any relevant materials from you.
- **Do not submit items such as oversized documents, audio or video tapes, CDs or DVDs, or flash drives.** This will result in your complaint being returned. Also, Commission staff will not visit any URLs provided in your statement of facts.
- All complaints are confidential until a certain point in the proceedings. Do not cross-reference the filing of an ethics complaint against another person in your statement of facts.

SECTION FOUR—Oath: Complaints must be sworn before a notary or other official authorized to administer oaths. Unsworn complaints will be returned.

WHERE TO FILE THE COMPLAINT: The original complaint form (original signature and notarization) must be mailed or delivered to the Commission of Ethics at the address on the complaint form. Photocopies or emailed forms cannot be accepted. The Commission address is: P. O. Box 15709, Tallahassee, Florida 32317-5709.

COMPLAINT PROCESS: For more information about the complaint process, please visit:
<https://ethics.state.fl.us/Complaints/Complaints.aspx>

ETHICS COMPLAINT SUBMISSION ETHICS COMPLAINT SUBMISSION

Complainant Name: Katherine Biancaniello Phone Number: 386-597-3340 Email Address:

kat143k@aol.com Mailing Address: 2434 county road 304 Bunnell FL 32110 Flagler County Subject of

Complaint: Gwendolyn J Lafferty Position: Vice Chair, City of Bunnell Planning, Zoning & Appeals Board

Subject Mailing Address: 1101 S. Daytona Ave Flagler Beach FL 32164 Flagler County


This complaint is submitted pursuant to the Florida Code of Ethics for Public Officers and Employees. The subject of this complaint, Lyn Johnston Lafferty, currently serves as Vice Chair of the Planning, Zoning & Appeals Board (PZA) for the City of Bunnell, Florida. It is my belief that Ms. Lafferty's participation in zoning deliberations regarding a Future Land Use Map Amendment (FLUMA) and rezoning application involving land in which she holds a financial interest constitutes a conflict of interest and a violation of her ethical obligations. Specifically, Ms. Lafferty has publicly acknowledged on social media that she is a co-owner of property within the 1,842-acre application submitted to the City of Bunnell for heavy industrial (L2) rezoning.

While she recused herself from voting during the May 6, 2025, PZA Board hearing, she remained in the room and did not file a formal voting conflict disclosure (Form 8B) to the best of our knowledge. Given her continued presence and the influence that position and visibility may confer, this raises valid concerns under Florida Statute §112.3143 regarding participation in matters benefiting one's financial interest. According to the Florida Commission on Ethics and Florida Statutes §112.3143, public officers are prohibited from voting on or participating in matters that would inure to their special private gain or the gain of their family or business associates. As a sitting board member and Vice Chair, Ms. Lafferty has an obligation to recuse herself from any discussion or recommendation process tied to zoning

decisions/discussions concerning land in which she has a vested financial interest during and prior to the first reading.

Historically as evident in previous zoning meeting minutes "The Respondent" has always held a stance of opposition to rezoning outside of the Comprehensive plan/intended use.

Additionally, she was promoted to Vice Chair of the PZA Board at the June 3, 2025, meeting, following the resignation of Carl Livavois, the only member who had previously voted against this expedited industrial rezoning request. The timing and nature of these events warrant further investigation. I respectfully request that the Florida Commission on Ethics investigate this matter and determine whether Ms. Lafferty's conduct violates the Code of Ethics for Public Officers. Given the significant public impact of the rezoning under consideration and the appearance of a conflict of interest, I urge prompt attention to this matter. Thank you for your time and service.



Signature of Complainant

Date 06/21/25