

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

ORIGINAL

FLORIDA
COMMISSION ON ETHICS

JUN 08 2015

RECEIVED

COMPLAINT
15-126

1. PERSON BRINGING COMPLAINT:

Name: JOHN RUFFALO Telephone Number: 386 283 4342

Address: 8 COLLINSON CT.

City: PALM COAST County: Flagler Zip Code: 32137

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 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 Flagler

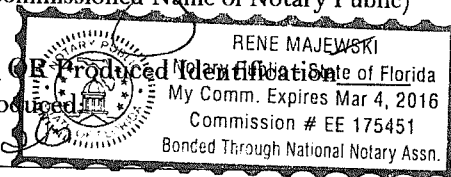
Sworn to (or affirmed) and subscribed before me
this 3 day of June 2015

2015, by John Ruffalo
(name of person making statement)

[Signature]
(Signature of Notary Public - State of Florida)

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

Personally Known Yes
Type of Identification Produced None



John Ruffalo
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, which contains publications, rules, and other information.

Florida Ethics Commission Complaint Attachment

RE: Barbara Sue Revels-Flagler County Board of County Commissioner

At this time an official complaint is being filed against Barbara Sue Revels and it is being requested that the Florida Ethics Commission reverse the action brought forward by Flagler County Commissioner Barbara Sue Revels to purchase real estate for \$1.23 million dollars from her associate Bruce Page due to:

1. Convoluted information being reported on sworn submitted FORM 6 disclosures making it difficult to clearly see and understand the financial interests of Barbara Sue Revels
2. Misleading information being reported which does not allow the public to easily see and understand the information required to be made public for their review
3. Under-reported information being reported-not disclosing complete accurate information by failing to provide itemization of assets, liabilities and clear understandable income information reflecting where all income is derived from
4. Intentional lack of transparency demonstrated in reporting financial interests, assets and liabilities---Barbara Revels reported to the Florida Ethics Commission on her 2012 Form 6 a liability of \$312,685 with Intracoastal Bank. She also reported a liability of \$426,234.07 with this same bank in 2014. It was also reported in 2012 and 2013 by Barbara Revels on her filed Form 6's that she held \$100,000 in stock at Intracoastal Bank. It is not believed her reported income warranted this extensive line of credit in the hundreds of thousands of dollars and due to her convoluted reporting and failure to itemize her assets and liabilities and report her income with transparency, it is not possible to determine where her assets are coming from and what her liabilities are. It is further believed her position as County Commissioner gained her the extensive banking privileges such as an extensive line of credit at Intracoastal bank, a possible trip to the Bahamas, a boat or a boat at a reduced price. It is unknown what other type of motions and/or votes she may have made that she may have benefited from
5. Failure to itemize assets exceeding \$1,000 in value and liabilities; only the creditor and total amount of the liability has been revealed
6. Failing to itemize from who and the address of where sources of income are received
7. Income reported is not reasonable for the number of rental properties identified located beach side any and assessed at the values reported by the Flagler County Property Appraiser
8. Reporting an unreasonable amount of income from a (source) business in which she is a 100% Shareholder that has been in existence since 1972, and not disclosing if the income reported from "**Ren** Coquina Real Estate & Const. (2012 Form filed on June 21, 2013) as rental income or income received as earnings from her private business. (It appears "**Ren**" is referenced on the June 21, 2013 FORM 6 "Part D—Income" as though the filer intended to report "Rental" Income and changed her mind to avoid transparency.) If income reported from Coquina Real Estate & Const. is from rental properties alone, then business income is not being reported
9. Under *Secondary Sources of Income PART D—INCOME*---the Name of Business Entity is not listed and disclosed, the name of the major source of income is not listed and disclosed, address of source is not listed and disclosed
10. Failing to report sources and amounts of income that would justify a \$426,234.07 line of credit being Extended to her by her associate Bruce Page, President of Intracoastal Bank
11. Failing to reveal what the liability to Intracoastal Bank would be for ie: mortgage, automobile, boat etc.
12. Failing to report the purchase of a boat for 13 months
13. Failing to disclose the boat purchase under individual assets over \$1,000
14. Failing to disclose if there is a liability for the boat purchase

15. Failing to disclose if there is a liability for her automobile
16. Filing "REVISED" forms rather than the required FORM 6X
17. Failing to file FORM 8 with the Ethics Commission and abstaining from voting as a county commissioner on the old hospital real estate where one of the part owners is her associate **which constitutes the action invalid and to be recalled by the Florida Ethics Commission**
18. Not disclosing this boat information until AFTER issues were raised about her and her associate being on her boat together in the Bahamas
19. Failing to have the 2013 FORM 6 filed on July 31, 2014 properly notarized as it does not bear the Notary Seal reflecting the Commission
20. Assets are listed by address on the spreadsheet provided by Barbara Revels that are not found on the Property Appraiser's website to locate such properties to confirm the "Asset Value" claimed and ownership.
21. Failing to provide values for assets on 2012 "REVISED" FORM 6 filing submitted on July 31, 2014
22. Failing to report assets such as stock, life insurance cash value, IRA-retirement account, Bank accounts, Business Interest in Coquina on filed 2012 FORM 6 filed on June 21, 2013
23. Failing to report interest in a Trust as real estate properties are in the name of Barbara Revels-Trustee and JTWROS
24. Intangible business assets for Coquina Real Estate & Construction not accurately being reported
25. Business Interest in Coquina itemized as an asset in the amount of a couple hundred thousands of dollars, however upon verifying personal property reporting with the Flagler County Property Appraiser's office Barbara Revels was NOT charged a personal property tax because she is entitled to \$25,000 exemption and her reported business assets are less than \$25,000. It is believed she has not fully reported on her FORM 6 this asset, inflated this asset or under reported to the Flagler County Property Appraiser. It appears a couple hundred thousand dollar asset for business interest in Coquina has been reported repeatedly on her FORM 6 submissions that may not have be able to be supported with documentation or proof which would allow her net worth to be inaccurately reported on the FORM 6 filings.
26. Listing real estate property values for different amounts from what the Property Appraiser has on record for "assessed values" and does not provide any supporting documents or appraisals to justify the different reporting amounts
27. Listing "Business Interest in Coquina" as an asset for nearly a quarter of a million dollars but not itemizing the asset value or providing information to support this claimed asset when the Coquina Office Building (Real Estate) is itemized separately and the value listed is the assessed value of the real estate
28. Bulking assets in excess of \$1,000 in household goods on submitted FORM 6 filings to avoid transparency in "Part B---Assets"
29. Filing FORM 6 filings under OATH affirming that the information disclosed on the form and any attachments hereto were true, accurate, and complete when this complaint may prove otherwise
30. Failure to follow outlined instructions in regards to the Form 6 forms filed to the Florida Ethics Commission

Failure to completely, accurately and fully disclose required information as has been outlined above, as well as possibly using her public position for personal gain warrants that this official complaint be filed with the Florida Ethics Commission against Barbara Sue Revels for the years 2008, 2009, 2010, 2011, 2012 and 2013. Barbara has served nearly 7 years as a County Commissioner and has had access to the County Attorney as well as the Ethics Commission's website and phone number to gain advice and instruction for filing the required FORM 6 if she needed assistance and guidance to ensure all

requirements were being met to leave no reason for one to file an Ethics complaint. Barbara Revels also is required to attend 4-hours of annual ethics training which allows her to have a full understanding and knowledge of Florida ethics requirements.

It is believed her motions and vote to anxiously promote the county to purchase the old hospital property from her associate, Bruce Page-President of Intracoastal Bank, and others part owners was knowingly and willfully done was done illegally and perhaps for her own personal gain. Had she not been the commission to make the motion for the purchase the other commissioners may not have done so and the purchase may not have occurred. Barbara Revels made the motion first on May 6, 2014 and when she didn't get the support for the purchase from the other commissioners she again made the motion on August 1, 2014, and at that time did get the support needed for the county to purchase the old hospital property for \$1.23 million dollars. This was done knowing one of the owners of the property was her associate at Intracoastal bank, the bank in which she held \$100,000 in stock and was extended nearly a half a million dollars in credit. What occurred is believed to be criminal in nature as she appears to personally gain by being extended a credit line that the under normal application process other banking customers would not be extended with the income she has reported on her FORM 6 filings. She also was on a boat in the Bahamas with Bruce Page following the sale, and should have filed a FORM 8B with the Florida Commission on Ethics according to Florida Statute 112.3143 and refrained from voting on the matter involving her associate, and she did not. When the Watch Dog group filed a law suit in Circuit Court to stop the sale it was dismissed as the county attorney, who should have advised Barbara Revels to file the 8B FORM and refrain from voting stated it was not the courts who was trained and qualified to handle the matter, it was the responsibility of the Florida Ethics Commission and the case was dismissed then forcing the Watch Dog group to pay the county thousands of dollars in legal fees for raising the issue. Barbara Revels conveniently "forgot" to include her boat purchase, which is believed to be \$120,000, on her filed FORM 6 for 2012, and therefore filed "REVISED" FORM 6 documents approximately 13 months after the fact, rather than the required FORM 6X documents and then did not clearly itemize her assets and liabilities. In fact because her liabilities did not increase, only her Net Worth increased, and because her assets at Intracoastal Bank/Bank of America/RBC did not decrease on her "REVISED" filings it is unknown if the boat was a gift perhaps from Bruce Page, if she was able to purchase it at a drastically reduced price and it is further believed if she did not receive personal gain from the extended line of credit provided to her from her associate Bruce Page at Intracoastal Bank she would not have the financial ability to purchase items such as the boat (if she did purchase it) or to purchase real estate to use as rental properties to gain income by renting them which would be more personal gain.

SEE ADDENDUM A

SEE ADDENDUM B

It also is confusing and concerning, and not transparent, that Barbara Revels lists on her FORM 6 itemized assets "Business Interest in Coquina" which is believed to be her real estate and construction business "Coquina Real Estate & Construction" located at 316 S. Ocean Shore Blvd. Flagler Beach, FL. for a couple hundred-thousand dollars when she lists the Coquina Office Building for an additional couple hundred-thousand dollars when they are one in the same and she is the 100% stock holder. She does not identify what the "Business Interest in Coquina" consists of or where the asset is located. The Property Appraiser, Jay Gardner has stated her Personal Intangible Property Tax bill is zero because she

SEE ADDENDUM C

was entitled to a \$25,000 exemption and the assets she reported were less in value. It does not appear that what she reported to the Florida Commission on Ethics (a couple hundred thousand dollars) and what was reported to the Flagler County Property Appraiser is consistent. At the very least, if the "Business Interest in Coquina" is valued at \$1,000 or more, the assets should have been itemized on Part B—Assets of the FORM 6 forms that Barbara Revels filed with the Florida Ethics Commission and it was NOT making her reporting very non transparent.

Barbara Revels has been the business owner of Coquina Real Estate and Construction since 1972 which started as one woman operation, and now employs numerous individuals. Barbara Revels has made the public statement quite often that she has met the payroll even in difficult times when construction and home sales were down. Perhaps this could be because it was never an issue for her to be extended credit from her associate Bruce Page because she owned stock in the business. From records I have seen there never seems to be a lack of income regardless of times being difficult or not, and regardless of income reported to support repaying the debt. An advantage she appears to have over other banking customers who must meet banking guidelines and regulations.

Barbara is a County Commissioner (elected official) here in Flagler County and earns under \$50k annually from Flagler County (which has been reported on her Form 6) and she reports other income received (less than \$20,000 in 2012 or \$30,000 in 2013) on her Form 6 (Financial Disclosure Statement) as rental income, yet she does not identify specifically from whom the rental income comes from and seems to hide behind her real estate and construction company by claiming income from other sources (rental income received from private citizens) as coming from her real estate and construction business, yet she does not report an income (other than rental income from privately owned real estate that is not owned by her business) from her private business. Per the FORM 6 instructions she was required to list the name of the source of income that provided her with more than \$1,000 of income, the address of that source, and the amount of income received from that source. Barbara Revels convolutes her reporting by combining received income and claiming it comes from her business rather than from tenants from personal properties she owns, that her business does not own.

She (and other commissions) voted to lease commercial water-front property such as the property located at Bing's Landing in the Hammock for approximately \$500/month which is far less than what water front property leases for in Flagler County for an extended period of time (believed to be 15 years) knowing this was not reasonable and other persons may have been interested and paid much more to rent such property. Again, this may be a case of not what you know, but who you know. Though Barbara Revels was asked multiple times if she would rent water front property she owns for the same rate she failed to publically respond. It is assumed she runs her business with the same ethical standards as she conducts county business as a county commissioner which leaves reason for concern. It is unknown if this tenant is an associate in any way to Barbara Revels or any of the other County Commissioners.

Barbara Revels has an active Florida Profit Corporation registered with the Department of State at Sunbiz.org and has filed Annual Reports since 2/21/1995.

Records also reflect that Barbara Revels purchased a property in Putnam County, Florida located at 100 Dotney Ave, San Mateo, Florida in February 2006 for \$117,500.

Some of the values for Flagler County real estate property reported on the filed FORM 6 filed by Barbara Revels are inflated and one being deflated in value as to what is reported on the Flagler County Property Appraiser's website of "assessed values" which may indicate the assets Barbara Revels has claimed are not accurately reported, which too may require an amended FORM 6X to be filed with the Commission on Ethics.

In November 2012 it appears according to documents Barbara Revels filed with the Florida Commission on Ethics when she submitted her FORM 6 that she and Jerry L. Lloyd purchased a property in Flagler County located at 115 Avalon Ave for \$170,000. The income she reported to the Florida Ethics Commission on her FORM 6 for 2012 doesn't appear to be sufficient to support such a purchase/liability and in 2012 the real estate and construction market didn't appear to be too stable. All in all it appears Barbara and/or Jerry L. Lloyd owns a total of 10 pieces of real estate assessed at nearly two million dollars according to documents Barbara Sue Revels has filed with the Florida Ethics Commission. Again according to the income she reported on her (FORM 6) Financial Disclosure Statements her/their income may not support such purchases and/or liabilities. It is therefore believed she is failing to report income to the Florida Ethics Commission and/or Internal Revenue Service. Upon reviewing property appraiser real estate own by Barbara Revels at www.FlaglerPA.com (386) 313-4150 several properties have been purchased since Barbara has been elected as County Commissioner and the reported income claimed on the submitted FORM 6 filings do not support such purchases; therefore again Barbara Revels is believed to be relying on her associate Bruce Page for her personal gain. It is unknown how intertwined her dealings are with Bruce Page and exactly how much personal gain she may be receiving in her position as County Commissioner or if there are more individuals such as Bruce Page that she may be personally gaining from. At any rate, any personal gain is too much, and Barbara Revels already demonstrated that she does not disclose who her associates are and file the required FORM 8 documents, and refrain from making motions and voting on matters that she should not.

Now to further explain how Barbara Revels reported the boat asset...based on documents filed with the Florida Ethics Commission on July 31, 2014 Barbara Revels stated she failed to disclose she and her husband purchased a boat in 2012 and she filed "REVISED" disclosure forms for the years 2012 and 2013. The change that appears on the 2012 Forms 6's is that she increased only her net worth by \$120,000, but did not increase any liability to Intracoastal Bank or list any other liabilities to indicate that the boat was financed. According to the Form 6 instructions all assets worth over \$1,000 are to be itemized and reported in Part B of the form and only those assets worth less than \$1,000 are to be reported in Part B under "Household Goods and Personal Effects" and Barbara Revels did not list the boat under this field. It is also realized that her itemized assets listed on the 2012 "REVISED" submission dated July 31, 2014 do not have a value and the list of assts differs (not as extensive) from the asset list submission she provided to the Ethics Commission on June 21, 2013 which would appear then to make her net worth less, yet her net worth did not change on the "REVISED" submission filed on July 31, 2014. With this being said, there is certainly some convoluted book keeping and reporting going on here by Barbara Revels and it appears her reporting is not transparent.

Per instruction by the Ethics Commission it appears when a correction/change is required that a FORM 6X must be filed, and Barbara has yet to file such a form which indicates that she may be in violation for improper filing or for not filing the required documents with the Florida Ethics Commission during the required periods. Please note it took Barbara Revels 13 months to realize she failed to report a \$120,000 asset (the boat) and she did not report this asset until after a complaint was filed with the Florida Ethics Commission and discussions began to circulate around Flagler County about her being on Bruce Page's boat in the Bahamas. Again, she did not list this boat as an individual asset on Part B of her Form 6 and it is valued at over \$1,000 and she did NOT list on the "REVISED" 2012 and 2013 forms filed on July 31, 2014 any liability increase on the filed "REVISED" forms. This is concerning to me for the simple reason if she purchased the boat in 2012 and forgot to initially report it, that when she did report it, the asset under the "REVISED" filing any debt associated with the asset must be reported. Barbara Revels has filed the FORM 6 for many years, and has been provided the instructions to know FORM 6X is to be filed to Amend the Full and Public Disclosure of Financial Interests, and to date she willfully and with knowledge failed to meet this requirement.

During a meeting with several individuals it was discussed about Barbara Revels and Bruce Page being on a boat, former Flagler County Communication's Director, Carl Laundrie stated Barbara Revels was NOT on Bruce Page's boat, he WAS on her boat! This is particularly interesting considering Bruce Page is the President of Intracoastal Bank, the same bank where Barbara Revels is a \$100,000 stock holder and perhaps on the board and this is the same bank where she has hundreds of thousands of dollars in liability which her income doesn't appear to warrant. Perhaps Barbara Revels should have filed a "FORM 10" with the Ethics Commission disclosing gifts received and she has failed to do so.

Bruce Page was a part owner of real estate that Barbara Revels as a county commissioner made a motion on May 6, 2014 for the county to purchase for more than a million dollars. Due to lack of support on May 6th the motion died. When the issue was revisited again on August 1, 2014, Barbara Revels again made a motion for the county to purchase the same described property partly owned by Bruce Page for nearly one and a quarter million dollars, and this time she received the support for the purchase to pass (4-1). It is believed Barbara Revels violated Florida Statute 112.3143 as she as a local public officer should NOT have voted upon any measure which would inure her special privilege or gain and she should have filed FORM 8B (MEMORANDUM OF VOTING CONFLICT FOR COUNTY, MUNICIPAL, AND OTHER LOCAL PUBLIC OFFICERS). Also prior to voting she should have publically stated to the assembly the nature of her interest in the matter from which she was abstaining from voting, and filed her FORM 8 with the person (normally the Clerk of Court staff) responsible for recording the minutes, and they were then required to incorporate the memorandum in the minutes.

According to the list of assets provided on the 2012 FORM 6 provided by Barbara Revels it is realized she had combined assets in Bank of America/ Intracoastal Bank/RBC in the amount of \$55,442. In 2013 her combined assets in Bank of America/Intracoastal Bank/RBC was reported as \$84,920 which may indicate that funds were not available for her to have paid cash for the boat purchase which is believed to have been \$120,000 and no liabilities were individually listed on the Form 6 reports she filed. It is also realized Barbara Revels' liabilities with Intracoastal Bank increased from 2012 to 2013 by \$113,549.07 yet her annual income declined in 2013 by \$8,884. Considering her income reduction and

income to debt ratio, it is unlikely she would be given a credit increase unless she received a special private gain from Bruce Page/Intracoastal Bank. It is unknown if Barbara Revels also had any credit card debt exceeding \$1,000 as no such debt was indicated on the filed reports.

It has been realized by reviewing records with the Flagler County Property Appraiser that Barbara Revels has real estate property in the name of "Barbara Revels Trustee" however she failed to report under assets her interest in the Trust on her FORM 6 forms which too may be a violation and warrants an investigation.

The instructions to complete the FORM 6 also state to NOT list simply "stocks and bonds" or "bank accounts" however it appear Barbara Revels did just that in 2012 and 2013 as she listed on the provided spreadsheet of assets "Asset Type" "Stock" and under "Address" listed simply the name of Intracoastal Bank. It appears she did the same thing for other assets such as IRA-retirement account and bank accounts, and Business Interest in Coquina. It is expected that years prior to 2012 may have been reported the same way, therefore it is requested that those years be included within this official complaint as well and that those years be investigated and addressed.

If Barbara Revels received rental income from personal properties she owns in her personal name and not that of her real estate and construction business name, and that income was more than \$1,000 it should have been itemized under income on her FORM 6, and it was not. The names and addresses of who provided the income should have been revealed, and again it does not appear to be reported, and therefore too is part of his official complaint. It is also unknown if she received other income from Stocks, IRA's, or pay from her Real Estate and Construction Company etc. that were not reported on the FORM 6's she filed and that too is a matter that is part of this official complaint. It is not likely that one is an owner of a business since 1972 and is not receiving income from the said business. Barbara Revels cannot obviously meet her liabilities and expenses on the income she reported on the filed Form 6 forms.

Barbara Revels claimed "Life Insurance Cash Value" with "Phoenix Life Insurance" as an "Asset Type" on her filed FORM 6 forms, yet it is believed this is not an asset and her reporting of such inflates her net worth. Because the reported Life Insurance is believed to NOT have a "cash surrender value" and only a value payable upon death, she may not have accesses to such funds therefore too is part of this official complaint and warrants investigation as it is important that elected officials be truthful, honest and transparent.

Though Barbara Revels filed Revised Form 6's with the Florida Commission on Ethic for the years 2012 and 2013, she has still failed to file the required Form 6X with the Florida Ethics Commission. Because she stated she and her husband purchased a boat in 2012, she failed to take this action to report this substantial purchase until after a complaint was filed against her for bringing forth a motion and then bringing forth a motion and voting on purchasing real estate from her business associate Bruce Page with Intracoastal bank. Barbara Revels did not take action to rectify this matter for 14 months after her first 2012 Form 6 was filed and the filing date is reflected as being June 21, 2013. I would also like to point out that on her 2012 form filed on June 21, 2013 the "Asset Value" nor her "Amount of Liability"

changed and the same is true on the 2013 forms. This in itself warrants an investigation because one can't purchase a boat which increases ones net worth by \$120,000 without showing an increase in liability or assets.

Also, please note that in 2012 FORM 6 form filed on June 21, 2013 it is reflected under "Part B-Assets" aggregate of household goods and personal effects as being \$8,800, and on the second Form 6 filed for 2012 filed on July 31, 2014 the figure increased to \$128,800, which is an increase of \$120,000. However, on the first Form 6 for 2013 filed on June 2, 2014 the "Part B—Assets the aggregate value listed is \$129,130 and though a "REVISED" form for 2013 was filed by Barbara Revels on July 31, 2014 along with a written statement being filed regarding the need to revise the 2012 and 2013 FORM 6's due to the boat purchase this figure did not change, nor did any other figure on her "REVISED" 2013 Form 6 that was filed on July 31, 2014. **I would also like to add that the 2013 FORM 6 filed on July 31, 2014 does not bear the seal of the Notary Public, therefore it not considered "notarized" and is not believed to be valid.**

Barbara Revels also is believed to have purchased a new car in 2013 or 2014 and it does not appear to be reflected on her filed 2012 or 2013 Form 6 forms. Therefore the forms filed may be absent asset or liability information resulting in an inaccurate net worth being reflected.

The citizens must be able to follow the money, and those that are required to file such forms must be transparent. County Commissioners are required to take annual Ethics training and should conduct themselves at the highest ethical standard possible. As an elected official Barbara Revels took an OATH to office and should demonstrate the highest ethical standards. The many issues raised in this complaint warrant a prompt complete and thorough investigation. Barbara Revels is in her second term as County Commissioner and has access to instruction as well as contact information to the Ethics Commission to obtain any necessary information to ensure she remains in full compliance of filing required forms. It is clear that Barbara Revels may have used her official elected position for her own personal gain as she twice made a motion and she voted for the county to purchase property partially owned by one of her associates in possible exchange for an extended line of credit that the normal walk in customer would not have received, and this too may have allowed her to personally gain by being offered the opportunity to purchase additional properties (as described within and as some supporting documents reflect) to gain income by renting them, and to be given an extended line of credit for a possible boat purchase, or for the possibility that she received a boat in exchange for her action as a county commissioner pushing for the county to purchase real estate from her associate Bruce Page and others.

It is being requested that the Florida Ethics Commission recall the sale (motions and vote) made by Barbara Revels for the purchase of the old hospital real estate as Barbara Revels should have filed FORM 8, disclosed to the assembly why she should abstain, and should have done so because her associate was a part owner of the real estate. According to the court records the courts do not take action on the matter leaving it entirely up to the Florida Ethics Commission stating they have training and the Commission has a Board who is qualified to take such action to recall this sale.

SEE ADDENDUM D

**IN THE CIRCUIT COURT, SEVENTH
JUDICIAL CIRCUIT, IN AND FOR
FLAGLER COUNTY, FLORIDA**

FLAGLER-PALM COAST WATCHDOGS,
a Florida corporation not-for-profit,

Plaintiff,

CASE No.

Division:

vs.

BOARD OF COUNTY COMMISSIONERS OF
FLAGLER COUNTY, FLORIDA, a political
Subdivision of the State of Florida,

Defendant.

_____ /

COMPLAINT FOR INJUNCTIVE RELIEF

COMES NOW the Plaintiff, FLAGLER-PALM COAST WATCHDOGS (hereinafter, "Plaintiff"), by and through their undersigned counsel, and respectfully requests this Court to issue Preliminary and Permanent Injunctive Relief. In support thereof, Plaintiff alleges the following:

JURISDICTION AND VENUE

1. Plaintiff is a Florida not-for-profit entity residing and operating in Flagler County, Florida, whose purpose is dedicated to total transparency of the activities of our local governments and their strict conformance to all Florida Statutes consistent with the state of Florida's Government in the Sunshine Doctrine.

2. Defendant, BOARD OF COUNTY COMMISSIONERS OF FLAGLER COUNTY (hereinafter, "Defendant") is a political subdivision of the State of Florida.

3. This action is subject to the jurisdiction of this Court, as it involves an action seeking equitable (i.e. injunctive relief) from a cause of action arising from a vote conducted by the Defendant on or about August 1, 2013 in Flagler County, Florida; as well as the vote on June 16, 2014 that approved additional expenditures for an architectural study to renovate and remodel the subject property.

4. On August 1, 2013, Defendant voted in favor of the purchase of a certain piece of real property formerly known as Memorial Hospital, alternatively known as the "Old Hospital" (hereinafter: "The Property"), located at 901, Moody Blvd. E., Bunnell, Florida 32110, situate in Flagler County, Florida.

FACTUAL ALLEGATIONS

4. On January 28, 2003, property records from the Flagler County Property Appraiser's Office indicate Maluchi Development Corporation purchased the Property for a purchase price of \$750,000. A public records search revealed its corporate directors as Bruce E. Page, Michael D. Chiumento II, and James A. Newslow III.

5. On August 8, 2005, Maluchi Development Corporation filed papers with the Florida Secretary of State, Division of Corporations to change its name to Flagler Crossroads, Inc.

6. On August 1, 2013, at the Emergency Operations Center, Building Three on or about 1:00 PM, Defendant held a public workshop to discuss purchasing the subject Property.

7. At that time and place, and following the public workshop, Defendant conducted a special meeting, wherein Defendant voted 4-1 to purchase the subject property for a purchase price of \$1.23 million dollars.

8. Property records from the Flagler County Property Appraiser's Office indicate that the subject Property had a 2012 Just Market Value of \$353,952.00 and a 2013 Just Market Value of \$661,453.00; the Assessed Value of the subject Property was \$353,952.00 in 2012 and the Assessed Value was \$389,374.00 in 2013.

9. On October 21, 2013, Flagler Crossroads, Inc. filed papers for voluntary dissolution with the Florida Department of State, Division of Corporations. Corporate directors, Bruce E. Page, Michael D. Chiumento II, and James A. Newslow III, voted unanimously to take such action.

10. Mr. Bruce E. Page is also listed as the President, CEO, and Director of Intracoastal Bank, a position he's held since March of 2007 until present; according to the website for Intracoastal Bank and public records from the Florida Department of State, Division of Corporations.

11. Pursuant to Florida Statutes §112.3145, public officials are required to submit a Full and Public Disclosure of Financial Interests, Form 6 document every year with a complete accounting of their personal finances.

12. On May 17, 2012, Flagler County Commissioner Barbara Revels submitted a completed Form 6, which became public record once received by the Flagler County Supervisor of Elections (time-stamped June 5, 2012), which included the following pertinent information: Ms. Revels listed herself as holding \$100,000.00 in shares of Intracoastal Bank stock and additionally listed herself as having liabilities to Intracoastal Bank in the amount of \$215,049.94.

13. On June 18, 2013, Flagler County Commissioner Barbara Revels submitted a completed Form 6, which became public record once received by the Flagler County Supervisor of Elections (time-stamped by the Commission on Ethics June 21, 2013), which included the following pertinent information: Ms. Revels listed herself as holding \$100,000.00 in shares of Intracoastal Bank stock and

additionally listed herself as having liabilities to Intracoastal Bank in the amount of \$312,685.00.

COUNT I: INJUNCTIVE RELIEF

14. Plaintiff restates and incorporates by reference Paragraphs 1-13 of the above Complaint.

15. A review of the public minutes surrounding the special meeting and the vote that took place on August 1, 2013 to purchase the subject Property does not reveal any Commissioner as having filled out a Form 8B Memorandum of Voting Conflict For County, Municipal, and Other Local Public Officers (a transcript of the public minutes is attached to this Complaint as Exhibit A).

16. Pursuant to Florida Statutes §112.3143,(3)(a):

No county, municipal, or other local public officer shall vote in an official capacity upon any measure which would inure to his or her special private gain or loss; which he or she knows would inure to the special private gain or loss of any principal by whom he or she is retained or to the parent organization or subsidiary of a corporate principal by which he or she is retained, other than an agency as defined in s. 112.312(2); or which he or she knows would inure to the special private gain or loss of a relative or business associate of the public officer. Such public officer shall, prior to the vote being taken, publicly state to the assembly the nature of the officer's interest in the matter from which he or she is abstaining from voting and, within 15 days after the vote occurs, disclose the nature of his or her interest as a public record in a memorandum filed with the person responsible for recording the minutes of the meeting, who shall incorporate the memorandum in the minutes.

17. Pursuant to Florida Statutes §112.312(4), a "business associate" is defined as:

(4)"Business associate" means any person or entity engaged in or carrying on a business enterprise with a public officer, public employee, or candidate as a partner, joint venturer, corporate shareholder where the shares of such corporation are not listed on any national or regional stock exchange, or co-owner of property.

18. As noted in Paragraphs 5-13 above, Mr. Bruce Page was one of three directors of Flagler Crossroads, the company that owned the subject Property prior

to Defendant's purchase, and was additionally the President, CEO, and shareholder in Intracoastal Bank.

19. As noted in Paragraphs 5-13 above, Flagler Crossroads made a substantial profit on the real estate transaction: with Defendant paying well over the listed Just-Market Value and the Assessed Value of the subject Property, per public property records listed on with the Flagler County Property Appraiser's Office.

20. As a co-shareholder in Intracoastal Bank, Commissioner Revels had an affirmative duty to disclose her business relationship with Mr. Page and/or Intracoastal Bank prior to voting on the purchase for the subject Property in compliance with Florida Statute §112.3143.

21. Furthermore, in a public opinion column published August 2, 2013 (approximately one day after the vote to purchase the subject Property) in the online newspaper, "www.FlaglerLive.com", by County Commissioner Frank Meeker, Mr. Meeker stated that there was "considerable lobbying" surrounding the purchase and stated "honestly, I can't help but feel I'm being led, at times by the nose, to a conclusion to support the hospital purchase." See Frank Meeker, *Why I Voted To Buy the Old Hospital Despite Reservations*, FlaglerLive (August 2, 2013), <http://flaglerlive.com/57363/meeker-old-hospital-fm/>; Attached as Exhibit B.

23. Pursuant to Florida Statutes §112.3175(1)(b)(3), "Any contract that has been executed in violation of this part is voidable: ...in any circuit court, by any appropriate action, by: ...Any citizen materially affected by the contract and residing in the jurisdiction represented by the officer or agency entering into such contract."

24. Due to the age of the property and the amount of time the subject Property has sat vacant, extensive renovations and remodeling will be needed before the intended tenant can occupy the Property.

25. Prior to the purchase of the subject Property, Defendants published an estimated cost for the refurbishment of 61.6% of the subject Property as \$6.075 million dollars. See Attached Exhibit C.

26. At a recent Public Workshop conducted June 16, 2014, Defendants approved an additional \$44,990.00 to be paid to TTV Architects for an architectural study into the remodeling of the subject Property.

27. Defendant's actions reasonably indicate that the planning and construction phases are imminent.

28. Plaintiff, along with other residents and businesses in Flagler County, will be permanently and irreparably damaged by any further costs expended on the subject Property, given the potential statutory violations surrounding the original purchase.

29. The damages are including, but not limited to: all future costs associated with the architectural and engineering studies commissioned to develop and remodel the subject Property; and all future costs associated with the construction work needed to remodel the property.

30. Additionally, as a Florida non-profit corporation founded to ensure public accountability and public transparency with publicly elected officials, Plaintiff will suffer special damages by a frustration of their stated public purpose.

31. Plaintiff has no adequate remedy at law that will prevent the irreparable harm cited above.

32. Plaintiff is seeking preliminary injunctive relief to prevent Defendant from expending any future monies on the subject Property, pending review into the circumstances surrounding the original vote to purchase the subject Property.

33. It is in the public interest that this Court enter an Order granting preliminary injunctive relief to prevent Defendant from taking further action and expending further resources on the subject Property given the potential statutory violations that could rescind the original purchase of the subject Property.

34. This prayer for injunctive relief is justifiable based on the fact a vote took place on June 16, 2014, that represents the first amendment to the initially proposed plan/budget and approved by the County Commissioners as it pertains to the subject Property. If allowed to take continue, this and all additional expenses will further increase the damages incurred by the Plaintiff, as well as the tax paying residents of Flagler County as a whole.

WHEREFORE, for good cause shown, Plaintiff respectfully requests that this Honorable Court enter an Order preliminarily and permanently enjoining Defendant, its agents, employees, officers and representatives from taking any and all further action that will or could result in the payment or allocation of any additional county resources, and/or additional commitments/obligations to spend or allocate any county resources in association with the subject Property described herein, and for such other relief that this Court may deem just and proper.

Respectfully submitted this 18th day of June, 2014, by undersigned counsel.

/s/ Joshua D. Knight
Attorney for Plaintiff
Florida Bar No. 38546
The Law Office of Joshua Knight
9 Florida Park Drive, N
Palm Coast, Florida 32137
(386) 385-4220 Office
(855) 768-6660 Facsimile
jknight@knight-legal.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy has been provided to the Flagler County Attorney, Albert J. Hadeed, by email, electronic filing portal, facsimile and US Postal Service this 18th day of June, 2014, utilizing the information contained on the service addendum attached hereto.

THE LAW OFFICE OF JOSHUA D. KNIGHT

/s/ Joshua D. Knight
Attorney for Plaintiff
Florida Bar No. 38546
9 Florida Park Drive, N
Palm Coast, Florida 32137
(386) 385-4220 Office
(855) 768-6660 Facsimile
jknight@knight-legal.com

SERVICE LIST

Albert J. Hadeed, Esquire
County Attorney
Flagler County, Florida
1769 E. Moody Boulevard
Building 2
Bunnell, Florida 32110
(386) 313-4105 Facsimile
ahadeed@flaglercounty.org
jcarter@flaglercounty.org

FlaglerLive.com

Flagler County Argues Charge Against Commissioner Revels Belongs at Ethics Commission, Not in Court

FlaglerLive | July 9, 2014



Flagler County's \$1.23 million acquisition of the old Memorial Hospital building last year is at the center of a lawsuit by a new group against the county. (© FlaglerLive)

If a local "watchdog" group wants to contest the ethical propriety of Commissioner Barbara Revels's vote last summer to buy the old Memorial Hospital in Bunnell for conversion into a Sheriff's Operations Center, the group may well do so—but not in Flagler County Circuit Court, Flagler County Commission Attorney Al Hadeed argues. The group has no standing in circuit court, but may take its case to the Florida Commission on Ethics.

Click On:

- Lawsuit and Ethics Charge Cite Flagler Commissioner Revels Ties to Business Associate in County's Old Hospital Buy
- Contempt and Deception: How Flagler County Sealed a Dirty Deal for the Old Hospital
- Testily and Disparaging Local "Papers," County Administrator and Commission Defend Hospital Buy
- Commissioner Frank Meeker: Why I Voted to Buy the Old Hospital Despite Reservations
- Sold: County Commission Votes 4-1 To Buy \$1.23 Million Hospital in Bunnell for Sheriff
- Appraisals for Old Hospital Place Value at \$1.5 Million as County Moves Toward Acquisition
- Divided Flagler Commission Moves Ahead With \$1.23 Million Option on Old Hospital
- Other People's Money: How Flagler County Is Closing on a Raw Deal at Taxpayers' Expense
- County Is Negotiating Acquisition of Old Hospital in Bunnell for New Sheriff's HQ
- In Prenup Haggling, County and Bunnell Agree to Split Old Courthouse, With Sheriff in Annex
- In a Historic Breakthrough, County Will Cede Old Courthouse to Bunnell for Its New City Hall

The Documents:

- Hamilton & Jacobs Appraisal
- Cooksey & Associates Appraisal
- Phase I Environmental Site Assessment
- Hazards Survey
- County Administrator's Memo and Option Agreement

Haddeed makes those arguments in the motion he filed last week to dismiss a lawsuit filed late last month by a new group that calls itself the Flagler Palm Coast Watchdogs.

When Revels was part of the 4-1 majority that voted to acquire the hospital for \$1.23 million from a trio of local investors, she did not file a form required by ethics laws indicating that she had a business relationship with Bruce Page, one of the investors. Page is the CEO of Intracoastal Bank, in which Revels has \$100,000 worth of stocks, according to the financial disclosure form she's required to file as an office holder. Haddeed says the form filing prior to the vote was not required, as the hospital transaction did not involve Intracoastal Bank, and Revels's finances were already transparent. The Watchdogs disagree, claiming that Revels had a conflict of interest that should have compelled her to recuse herself from the vote, and explain her recusal.

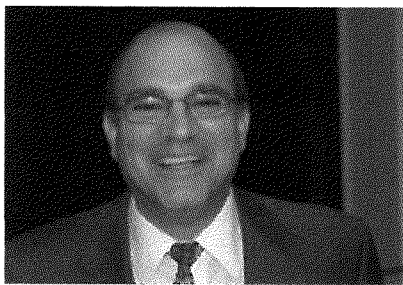
The county's motion to dismiss does not attempt to invalidate the claim that Revels violated the state's ethics laws. Only to remove the court from the equation. In fact, a complaint was filed with the Florida Commission on Ethics making the same charge against Revels, but by a different, if politically related, individual—Ray Stevens, the former candidate for sheriff.

The Watchdogs group is actually one man, Daniel Bozza, who works closely with the Ronald Reagan Republican Assembly of Flagler County, the temperamentally secretive right-wing group

aiming to subvert the local Republican establishment. (When Bozza spoke to the group earlier this week at the Palm Coast Community Center, Bob Hamby, who heads the group, barred Kimble Medley, a former Republican candidate for Supervisor of Elections—whose first name should not prompt confusion with current Supervisor Kimberle Weeks—from attending.)

Bozza would not disclose the names of other members of the group, if any, when asked after he filed the lawsuit last month, but said the group is seeking a non-profit designation and intends to be the conduit for fund-raising that would then underwrite the filing of more lawsuits against local government.

Hadeed's motion, in a sleight of rhetorical jujutsu, uses those intentions to make one of a half dozen arguments concluding that the group has no standing to sue the county in circuit court—at least not over the issues it raised against Revels and cited concerning Commissioner Frank Meeker. (Hadeed does not mention either commissioner by name in his motion.) Since the group leaves its identity imprecise, it does not show that it has been “affected in a substantially different manner or degree” by the county's purchase of the hospital any more than have other county residents at large.



Al Hadeed. (© FlaglerLive)

“The reality is that [the Watchdogs group] does not stand in a superior position to the rest of Florida citizenry, with respect to the right to ensure public accountability and transparency, and if there has been a failure to be accountable or transparent, the plaintiff does not suffer a greater harm than the rest of the community. Absent the demonstration of a special injury, the plaintiff has no standing.”

In plainer English: Cheekiness, evasion or secrecy undermine the legitimacy of the Watchdogs' claims.

But the legal heart of Hadeed's motion goes to a simpler matter.

Florida law—the state constitution and state statutes—make clear who arbitrates what. In matters of ethics, the nine-member Florida Commission on Ethics was created to investigate the alleged ethics breaches of public officials, interpret ethics laws and recommend penalties or further action when laws are found to have been broken. Florida law specifically removes circuit courts from that responsibility, granting that authority to the ethics commission. Less than two years ago, Rodolfo Pedraza, a resident of Miami, filed suit challenging the validity of Frank Hernandez to run for county judge, because Hernandez had allegedly not included his home

mortgage as a liability in financial disclosures. The court dismissed the suit, saying it was up to the ethics commission exclusively to make that determination. Hadeed cites that case in his argument to the circuit court.

“The trial court lacks not only the authority but the unique resources and processes of the Ethics Commission to investigate and report violations of the Code of Ethics,” Hadeed’s motion reads. “The trial courts do not have the experience or the body of jurisprudence developed by the Commission since its creation in the 1970s for addressing violations of the Code of Ethics.”

Addendum C

1 of 4



Search Criteria: Owner Search=revels

Search produced the following results. Select one by clicking the parcel number link in the first column below.



Parcel Number	Owner Name	Address	Legal Information	Homestead	Last Sale	GIS Map
12-12-31-5900-00770-0340	LLOYD JERRY L & BARBARA S REVELS H&W	704 MOODY LN	AMN-SUB DIV-VENICE PARK BL-77	N	2014-04-28	Map It
12-12-31-4500-00030-0060	REVELS BARBARA TRUSTEE	500 N CENTRAL AVE	MOODY SUB.LOT 6, BLOCK 3 OR	N	2001-06-01	Map It
12-12-31-4500-00030-0070	REVELS BARBARA S TRUSTEE	112 5TH ST N	MOODY SUBD BLOCK 3 LOT 7 OR	N	1998-02-01	Map It
12-12-31-4500-00100-0100	REVELS BARBARA S TRUSTEE	316 S OCEAN SHORE BLVD	MOODY SUBD BLOCK 10 LOT 10 &	N	1998-02-01	Map It
19-12-32-4550-00040-0090	REVELS BARBARA S	351 22ND ST S	MORNINGSIDE SUBD. BLOCK 4 LOT	N	2000-03-01	Map It
19-12-32-4550-00330-0040	REVELS BARBARA S LIFE ESTATE	354 22ND ST S	MORNINGSIDE SUB DIV BL-33 LOTS	Y	1998-10-01	Map It
07-11-31-7034-00050-0020	REVELS BARBARA S &	11 EMERALD LN	PALM COAST SEC 34 BL 5 LT 2 OR	N	1999-03-01	Map It
11-12-31-3025-00060-0150	REVELS BARBARA S & JERRY L LLOYD JTWROS	327 CONNECTICUT AVE	0000.14 ACRES HILLCREST UR	N	1998-02-01	Map It
12-12-31-5900-00750-0300	REVELS BARBARA S & JERRY L LLOYD	115 AVALON AVE	AMN-SUB DIV-VENICE PARK BL 75	N	2012-11-21	Map It
07-11-31-1040-00000-0600	REVELS CONNIE LIFE ESTATE	1 LEWISDALE LN	CANTERBURY ESTATES MB 35 PG 3	N	2013-07-30	Map It
07-11-31-1040-00000-0280	REVELS CONNIE LIFE ESTATE	10 LEWISDALE LN	CANTERBURY ESTATES MB 35 PG 3	N	2013-07-30	Map It
07-11-31-1040-00000-0050	REVELS CONNIE LIFE ESTATE	10 LEWISTON CT	CANTERBURY ESTATES MB 35 PG 3	N	2013-07-30	Map It
07-11-31-1040-00000-0290	REVELS CONNIE LIFE ESTATE	12 LEWISDALE LN	CANTERBURY ESTATES MB 35 PG 3	N	2013-07-30	Map It
07-11-31-1040-00000-0170	REVELS CONNIE LIFE ESTATE	13 LEWISTON CT	CANTERBURY ESTATES MB 35 PG 3	N	2013-07-30	Map It
07-11-31-1040-00000-0300	REVELS CONNIE LIFE ESTATE	14 LEWISDALE LN	CANTERBURY ESTATES MB 35 PG 3	N	2013-07-30	Map It
07-11-31-1040-00000-0310	REVELS CONNIE LIFE ESTATE	16 LEWISDALE LN	CANTERBURY ESTATES MB 35 PG 3	N	2013-07-30	Map It
07-11-31-1040-00000-0320	REVELS CONNIE LIFE ESTATE	18 LEWISDALE LN	CANTERBURY ESTATES MB 35 PG 3	N	2013-07-30	Map It
07-11-31-1040-00000-0430	REVELS CONNIE LIFE ESTATE	2 LEWIS DR	CANTERBURY ESTATES MB 35 PG 3	N	2013-07-30	Map It
07-11-31-1040-00000-0330	REVELS CONNIE LIFE ESTATE	22 LEWISDALE LN	CANTERBURY ESTATES MB 35 PG 3	N	2013-07-30	Map It
07-11-31-1040-00000-0220	REVELS CONNIE LIFE ESTATE	3 LEWISTON CT	CANTERBURY ESTATES MB 35 PG 3	N	2013-07-30	Map It
07-11-31-1040-00000-0420	REVELS CONNIE LIFE ESTATE	4 LEWIS DR	CANTERBURY ESTATES MB 35 PG 3	N	2013-07-30	Map It
07-11-31-1040-00000-0020	REVELS CONNIE LIFE ESTATE	4 LEWISTON CT	CANTERBURY ESTATES MB 35 PG 3	N	2013-07-30	Map It
07-11-31-1040-00000-0210	REVELS CONNIE LIFE ESTATE	5 LEWISTON CT	CANTERBURY ESTATES MB 35 PG 3	N	2013-07-30	Map It
07-11-31-1040-00000-0030	REVELS CONNIE LIFE ESTATE	6 LEWISTON CT	CANTERBURY ESTATES MB 35 PG 3	N	2013-07-30	Map It
07-11-31-1040-00000-0040	REVELS CONNIE LIFE ESTATE	8 LEWISTON CT	CANTERBURY ESTATES MB 35 PG 3	N	2013-07-30	Map It
23-11-31-5775-00000-0190	REVELS CONNIE C LIFE ESTATE	3218 N OCEAN SHORE BLVD	TOWER OCEANFRONT UR SUBD LOT	N	2013-07-31	Map It
07-11-31-7037-01120-0150	REVELS CONNIE C & DANA D SIMPSON JTWROS	9 LEWIS SHIRE WAY	PALM COAST SECTION 37 BLOCK	Y	2006-12-05	Map It
40-10-31-4100-00000-0530	REVELS DEEN A	42 SHADY LN N	MAGNOLIA MANOR UNIT 2 LOT 53	N	2014-01-29	Map It
40-10-31-4100-00000-0540	REVELS DEEN A	44 SHADY LN N	MAGNOLIA MANOR UNIT 2 LOTS 54	N	2014-01-29	Map It
37-12-31-0613-00000-0370	REVELS GEORGE F & MIRIAM S	4012 JOHN ANDERSON HWY	BULOW WOODS UNIT 4 LOT 37 OR	Y	1989-07-01	Map It
37-12-31-0614-00000-0250	REVELS JED	5 TRAIL RUN	BULOW WOODS UNIT V LOT 25 OR	Y	2001-12-01	Map It

24



Flagler County Property Appraiser's Office

[Sales In Area](#)
 [Previous Parcel](#)
 [Next Parcel](#)
 [Return to Main Search](#)
 [Flagler Home](#)

Property Record Card

Owner and Parcel Information

Owner Name	REVELS BARBARA S TRUSTEE	Today's Date	June 2, 2015
Mailing Address	PO BOX 434	Parcel Number	12-12-31-4500-00100-0100
	FLAGLER BEACH, FL 32136	Tax District	FLAGLER BEACH REDEVELOPMENT AREA (District 22)
Location Address	316 S OCEAN SHORE BLVD	2014 Millage Rates	21.63550
Property Usage	STORE/OFFI (001200)	Homestead	N

[Tax Collector Bill](#)
 [Show Parcel Maps](#)
 [Generate Owner List By Radius](#)
 [Show Assessment Notice](#)
 [Show Historical Assessments](#)

Value Information

	2013 Certified Values	2014 Certified Values	2015 Working Values
Building Value	\$110,857	\$112,331	\$115,888
Extra Feature Value	\$4,827	\$4,827	\$4,525
Land Value	\$96,320	\$120,400	\$120,400
Land Agricultural Value	\$0	\$0	\$0
Agricultural (Market) Value	\$0	\$0	\$0
Just (Market) Value*	\$212,004	\$237,558	\$240,813
Assessed Value	\$212,004	\$233,204	\$240,813
Exempt Value	\$0	\$0	\$0
Taxable Value	\$212,004	\$233,204	\$240,813
Protected Value	\$0	\$4,354	\$0

Legal Information

MOODY SUBD BLOCK 10 LOT 10 & SOUTHERLY 18 INCHES OF LOT 9 OR 230 PG 429 OR 266 PG 365 OR 255 PG 143 OR 552 PG 1860 OR 605 PG 239-REVELS TRUST OR 1670/358-CD

The legal description shown here may be condensed for assessment purposes. Exact description should be obtained from the recorded deed.

Just (Market) Value description - This is the value established by the Property Appraiser for ad valorem purposes. This value does not represent anticipated selling price.

Building Information

Type	Construction Class	Total Area	Finished Area	Perimeter	Exterior Wall	Wall Frame
RTAIL/RES	OC	3,647	3,647	213	STUCCO / VINYL LAP	CLASS C
HVAC	Stories	Wall Height	Actual Year Built	Effective Year Built	Fire Sprinklers	Building Sketch
PKG A/C	2	10	1986	1995	N/A	Show Building Sketch

Extra Features Data

Description	Units	Effective Year Built
SIDEWALK CONC AVG	340 SF	1986
CONC PARKING SPACE	10 UT	1986
RISER CONC AVG	68 LF	1986
LANDING CONC AVG	16 SF	1986
STRG SHED WOOD AVG	24 SF	1995
CANOPY WOOD	413 SF	1986
CANOPY CLOTH AVG	154 SF	2000

Sale Information

Sale Date	Sale Price	Instrument	Deed Book	Deed Page	Sale Qualification	Vacant or Improved	Grantor
02-01-1998		N/A	605	239	Unqualified	Improved	REVELS BARBARA S
03-01-1996	\$ 130,000	N/A	552	1860	Unqualified	Improved	WILSON BERNIE L & CATHERINE P
04-01-1985		N/A	255	143	Unqualified	Vacant	
03-01-1984	\$ 20,000	N/A	230	429	Unqualified	Vacant	
01-01-1900	\$ 365,847	N/A	0	0	Qualified	Improved	CONVERSION

Land Information

For land plat information see [Flagler Clerk of Court Website](#)

The Flagler County Property Appraiser's Office makes every effort to produce the most accurate information possible. No warranties, expressed or implied, are provided for the data herein, its use or interpretation. The Senior Exemption Does Not Apply to All Taxing Authorities. Just (Market) Value is established by the Property Appraiser for ad valorem tax purposes. It does not represent anticipated selling price. Working values are subject to change. Website Updated: June 2, 2015

© 2011 by the County of Flagler, FL | Website design by [gpublic.net](#)

Addendum

3 of 4



Flagler County Property Appraiser's Office

[Sales In Area](#) [Previous Parcel](#) [Next Parcel](#) [Return to Main Search](#) [Flagler Home](#)

Property Record Card

Owner and Parcel Information

Owner Name	REVELS BARBARA S TRUSTEE	Today's Date	June 2, 2015
Mailing Address	PO BOX 434 FLAGLER BEACH, FL 32136	Parcel Number	12-12-31-4500-00030-0070
Location Address	112 5TH ST N	Tax District	FLAGLER BEACH AREA (District 21)
Property Usage	SINGLE FAM (000100)	2014 Millage Rates	21.63550
		Homestead	N

[Tax Collector Bill](#) | [Show Parcel Maps](#) | [Generate Owner List By Radius](#) | [Show Assessment Notice](#) | [Show Historical Assessments](#)

Value Information

	2013 Certified Values	2014 Certified Values	2015 Working Values
Building Value	\$36,745	\$44,777	\$49,503
Extra Feature Value	\$356	\$343	\$330
Land Value	\$58,000	\$66,500	\$80,000
Land Agricultural Value	\$0	\$0	\$0
Agricultural (Market) Value	\$0	\$0	\$0
Just (Market) Value*	\$95,101	\$111,620	\$129,833
Assessed Value	\$95,101	\$104,611	\$115,072
Exempt Value	\$0	\$0	\$0
Taxable Value	\$95,101	\$104,611	\$115,072
Protected Value	\$0	\$7,009	\$14,761

Legal Information

MOODY SUBD BLOCK 3 LOT 7 OR 383 PG 261 OR 409 PG 998- ENCROACHMENT ESMT AGROR 605 PG 235-REVELS TRUST OR 1670/362-CD

The legal description shown here may be condensed for assessment purposes. Exact description should be obtained from the recorded deed.

*Just (Market) Value" description - This is the value established by the Property Appraiser for ad valorem purposes. This value does not represent anticipated selling price.

Building Information

Type	Effective Area	Living Area	Exterior Wall	Roof Cover	Interior Wall
SINGLE FAM	1,117	555	CON.STUCCO	BLT UP TAR	DRYWALL
Baths	Heating Type	A/C Type	Flooring	Actual Year Built/Effective Year Built	Sketch Building
2	FO AIR N/D	WINDOW UNT	CARPET / VINYL TILE	1975 / 1980	Show Building Sketch

Extra Features Data

Description	Units	Effective Year Built
CONCRETE WW	264 SF	1990

Sale Information

Sale Date	Sale Price	Instrument	Deed Book	Deed Page	Sale Qualification	Vacant or Improved	Grantor
02-01-1998		N/A	605	235	Unqualified	Improved	REVELS BARBARA S
03-01-1989	\$ 50,000	N/A	383	261	Qualified	Improved	
01-01-1900	\$ 127,069	N/A	0	0	Qualified	Improved	CONVERSION

Land Information

For land plat information see [Flagler Clerk of Court Website](#)

The Flagler County Property Appraiser's Office makes every effort to produce the most accurate information possible. No warranties, expressed or implied, are provided for the data herein, its use or interpretation. The Senior Exemption Does Not Apply to All Taxing Authorities. Just (Market) Value is established by the Property Appraiser for ad valorem tax purposes. It does not represent anticipated selling price. Working values are subject to change. Website Updated: June 2, 2015

© 2011 by the County of Flagler, FL | Website design by [qpublic.net](#)

26

Addendum C

4 of 4



[Sales In Area](#) [Previous Parcel](#) [Next Parcel](#) [Return to Main Search](#) [Flagler Home](#)

Property Record Card

Owner and Parcel Information

Owner Name	REVELS BARBARA TRUSTEE	Today's Date	June 2, 2015
Mailing Address	P O BOX 434	Parcel Number	12-12-31-4500-00030-0060
Location Address	FLAGLER BEACH, FL 32136	Tax District	FLAGLER BEACH AREA (District 21)
Property Usage	500 N CENTRAL AVE	2014 Millage Rates	21.63550
	MULTI-FAMI (000850)	Homestead	N

[Tax Collector Bill](#) | [Show Parcel Maps](#) | [Generate Owner List By Radius](#) | [Show Assessment Notice](#) | [Show Historical Assessments](#)

Value Information

	2013 Certified Values	2014 Certified Values	2015 Working Values
Building Value	\$45,567	\$45,185	\$46,167
Extra Feature Value	\$197	\$197	\$197
Land Value	\$58,000	\$66,500	\$80,000
Land Agricultural Value	\$0	\$0	\$0
Agricultural (Market) Value	\$0	\$0	\$0
Just (Market) Value*	\$103,764	\$111,882	\$126,364
Assessed Value	\$103,764	\$111,882	\$123,070
Exempt Value	\$0	\$0	\$0
Taxable Value	\$103,764	\$111,882	\$123,070
Protected Value	\$0	\$0	\$3,294

Legal Information

MOODY SUB.LOT 6, BLOCK 3 OR 409 PG 998-ENCROACHMENT
ESMT AGROR 486 PG 1943 OR 751 PG 1905

The legal description shown here may be condensed for assessment purposes. Exact description should be obtained from the recorded deed.

*Just (Market) Value" description - This is the value established by the Property Appraiser for ad valorem purposes. This value does not represent anticipated selling price.

Building Information

Type	Effective Area	Living Area	Exterior Wall	Roof Cover	Interior Wall
MULTI FAM	2,173	2,144	CONCR BLK / PLY W/BATT	BLT UP TAR	DRYWALL
Baths	Heating Type	A/C Type	Flooring	Actual Year Built/Effective Year Built	Sketch Building
4	FO AIR DCT	CENTRAL	CARPET / VINYL TILE	1960 / 1973	Show Building Sketch

Extra Features Data

Description	Units	Effective Year Built
CONCRETE WW	315 SF	1960

Sale Information

Sale Date	Sale Price	Instrument	Deed Book	Deed Page	Sale Qualification	Vacant or Improved	Grantor
06-01-2001	\$ 137,500	N/A	751	1905	Qualified	Improved	HENRY LEONARD F JR &
04-01-1993		N/A	486	1943	Unqualified	Improved	
01-01-1900	\$ 145,635	N/A	0	0	Qualified	Improved	CONVERSION

Land Information

For land plat information see [Flagler Clerk of Court Website](#)

The Flagler County Property Appraiser's Office makes every effort to produce the most accurate information possible. No warranties, expressed or implied, are provided for the data herein, its use or interpretation. The Senior Exemption Does Not Apply to All Taxing Authorities. Just (Market) Value is established by the Property Appraiser for ad valorem tax purposes. It does not represent anticipated selling price. Working values are subject to change. Website Updated: June 2, 2015

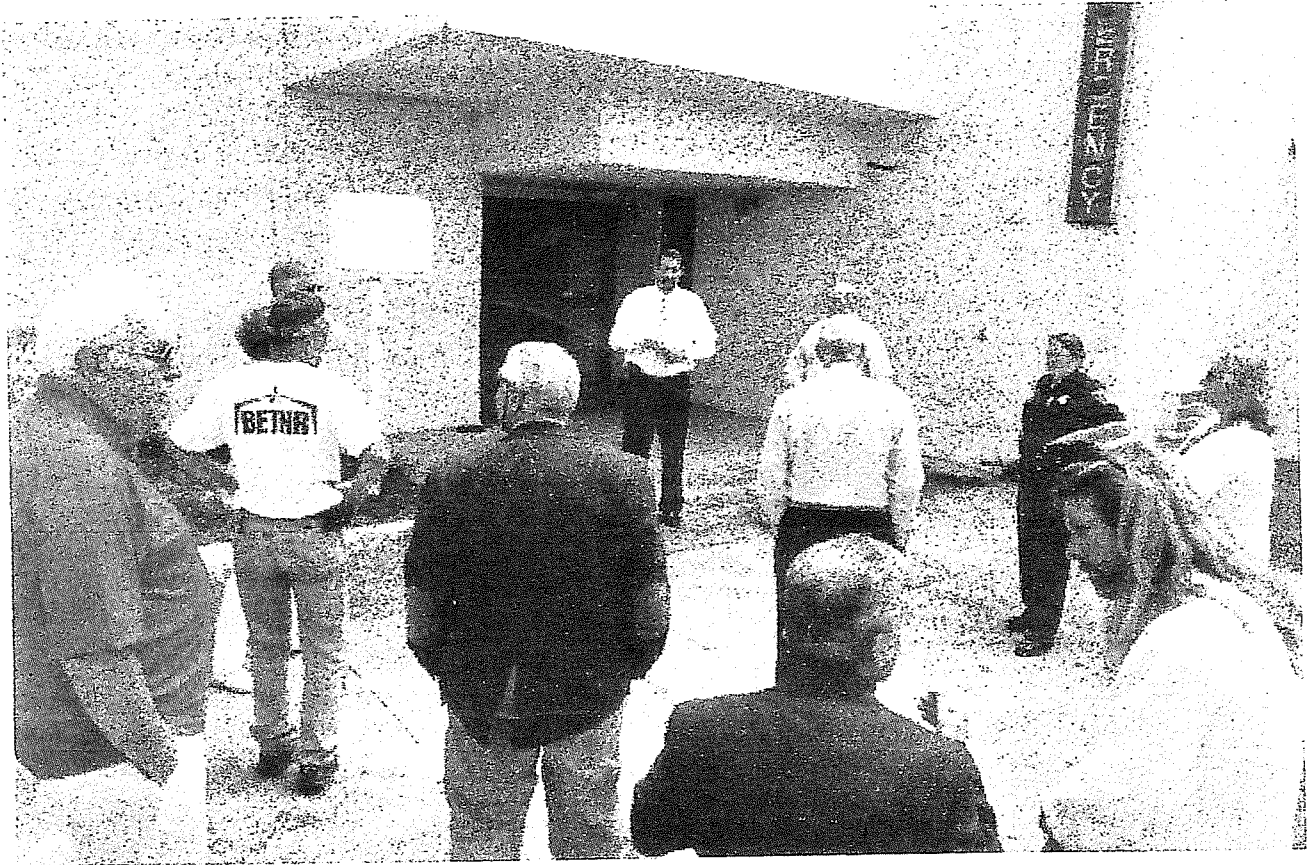
© 2011 by the County of Flagler, FL | Website design by [qpublic.net](#)

27

Contempt and Deception: How Flagler County Sealed a Dirty Deal for the Old Hospital



FlaglerLive | August 16, 2013



County Administrator Craig Coffey, facing the camera, as he was briefing county commissioners and others before tours of the old Memorial hospital in May. (© FlaglerLive)

It's not unusual for politicians and their administrators on our local government boards to blow smoke in taxpayers' eyes as they go about misusing taxpayer money. But last week's dog and pony show by County Administrator Craig Coffey and Commission Chairman Nate McLaughlin stands out.



The Live Column

Pierre Tristam



They insulted the public's intelligence by claiming to have been transparent about the hurried deal to buy the old and decrepit Memorial hospital for the indefensible price of \$1.23 million (for a property that sold for \$750,000 in 2003 and that hasn't exactly gotten handsomer since). They hid behind the cherry-picked documents Coffey stage-managed as if the substance of the deal was in those documents rather than in secret meetings Coffey carried out, with his commissioners' knowledge, but not the public's. Let's not forget that on this allegedly transparent and sunshine-challenged commission, every commissioner knew a deal was going down with the hospital owners in April before it was ever mentioned in public, until FlaglerLive reported it.

And of course during that seal-the-deal commission meeting last week Coffey mocked what he calls the local "papers," accusing them of reporting only "snippets," and urging people to get the real truth by looking up records posted on the county's website and in discussions spoken during workshops and meetings. "I wouldn't encourage people to read the paper," were Coffey's exact words.

Because as we all know, there's nothing like government honesty.

McLaughlin's snide thank you to Coffey aside, fellow-commissioners sat there with their complicit silence, letting their administrator disparage local businesses as they never would let him if he was referring to, say, one of their pals' banks, or one of their lawyer pals' firms. But they have reasons to keep mum. Remember, these commissioners are paying for all this with proceeds from a sales tax they passed unilaterally last year and for the next 20 years, knowing fully well it wouldn't pass at the ballot box. They don't like these reminders because it gives voters ideas when they *do* get a chance to vote.

That's why bashing media is every craven politician's cheapest scapegoat. The problem in this case is that Coffey and McLaughlin did the bashing behind a small army of straw men, then turned around and flatly peddled one deception after another.



Craig Coffey. (© FlaglerLive)

Coffey passed off a PowerPoint presentation that any clever middle schooler could have cut and pasted together as the end-all analysis of the deal. To put "PowerPoint" and "analysis" in the same sentence is an oxymoron. But even the missing bullet points left gaping holes in the

presentation. There were no answers to basic questions such as the recurring costs of running that colossal new acquisition, the lost tax revenue to local governments (especially Bunnell's crippled redevelopment taxing district for that area), the source of money for the interest payments on the loan the county will soon take out to pay for its potato-salad of a building, all this presumably with the similarly mounting maintenance costs of the larger jail Coffey and the sheriff want to build, not to mention the mountain of cans commissioners and Coffey say they've been kicking down the road, and that they'll have to be paying for very soon, and so on. None of that was even hinted at in Coffey's "analysis."

A few weeks ago Commissioner Barbara Revels pointed out the lack of cleanliness in the Government Services Building, brought on by cuts in custodial services. If the county is having trouble keeping its main building's toilets, it'll be interesting to see how it intends to manage a 60,000 square foot addition—with money that will have to come out of the general fund, not from sales tax revenue. Money it does not have. Money it is as we speak raising taxes dramatically to close its deficits.

Not that you saw any of this in that pretty PowerPoint, either.

Click On:

- Testily and Disparaging Local "Papers." County Administrator and Commission Defend Hospital Buy
- Commissioner Frank Meeker: Why I Voted to Buy the Old Hospital Despite Reservations
- Sold: County Commission Votes 4-1 To Buy \$1.23 Million Hospital in Bunnell for Sheriff
- Appraisals for Old Hospital Place Value at \$1.5 Million as County Moves Toward Acquisition
- Divided Flagler Commission Moves Ahead With \$1.23 Million Option on Old Hospital
- Other People's Money: How Flagler County Is Closing on a Raw Deal at Taxpayers' Expense
- County Is Negotiating Acquisition of Old Hospital in Bunnell for New Sheriff's HQ
- In Prenup Haggling, County and Bunnell Agree to Split Old Courthouse, With Sheriff in Annex
- In a Historic Breakthrough, County Will Cede Old Courthouse to Bunnell for its New City Hall

The Documents:

- Hamilton & Jacobs Appraisal
- Cooksey & Associates Appraisal
- Phase I Environmental Site Assessment
- Hazards Survey
- County Administrator's Memo and Option Agreement

One of Coffey's most blatant deceptions, never once questioned by commissioners too busy playing their assigned roles in this closed-circuit circle jerk, was the calculation of the 60,000 square foot hospital's reconstruction costs. First, he tried to deflate the purchase cost by

\$750,000 by applying a nutty pro-rated formula in accordance with the square footage only the sheriff would use, as if the county were buying just half the thing. It took Commissioner Charlie Erickson, a Colombo-type personality who hides his claws behind a genial demeanor, to set Coffey's numbers straight.

But only half the numbers. The rest of the discussion stuck to costs of reconstruction applying only to the half of the building the county will refurbish immediately, without taking into account the reconstruction and maintenance cost of the whole structure even though one of the selling points of the building is its size, and what it will enable the county to do in the future. One of Coffey's "options" included that of demolishing the hospital and building new, at a cost of \$4.55 million. That option was included as if to highlight its expense: \$7.8 million overall, as opposed to \$6.55 million for merely refurbishing *half* the existing building. But the \$7.8 million was as close to an honest number as there was that day. It was quickly dismissed. There was a script to follow.

McLaughlin, who had been more cautious and questioning until then, went so far as to say that the hospital buy is only the culmination of years of meetings—as if the county had been negotiating buying the hospital for the past seven years rather than the past few weeks. But what the hell. Since there's a document about rebuilding the sheriff's office and jail dating back to 2005, let's just say, as Coffey did, that this deal has been in the works eight years. You could dance sophistry to the rhythms of Coffey's logic.

(And not just sophistry. There's something sinister about the way Coffey tries to undermine his challengers. When I called him last Friday afternoon to get his reaction to County Spokesman—and my former colleague—Carl Laundrie's accident, Coffey intimated that I was to blame for the wreck, because Laundrie had been "agitated" from hearing a version of this piece air on WNZF Friday morning. It was a vile suggestion, and Coffey knew it. He backed off when I protested. But he'd made it. That was enough. So he rolls.)

It got worse in that meeting last week. Coffey at one point not only again blamed the media about inaccurately reporting the original acquisition price of the hospital years ago. He went on to misstate the facts himself, and very gravely so, because he was again and falsely making it seem as if the sellers were giving away the property at a loss. This is what Coffey said: "The purchase price that the current owners paid of \$750,000, that is not correct. Mr. Gardner will tell you that that was a number generated from his office through some error in software or what have you, but the actual purchase price, he does not have. It's not recorded in that sense. Essentially it was a \$1.6 million purchase."

He just threw that figure out there. A figure more than twice the formal selling price. A figure backed by not a single official document, though Coffey can refer to an obscure one-page memo—not from the hospital owners, not one of whom showed his face throughout this charade, but from their real estate broker. And again, not one commissioner questioned Coffey about the substance of his \$1.6 million figure. Ah, the transparency.

Coffey was conveniently mixing fact and fiction. There was a fictional transaction once recorded in Gardner's records. Gardner has since removed any trace of that alleged 2006 real estate deal from his website, because there indeed was none. But nor was there a fictional \$1.6 million transaction.

The original acquisition of the hospital, by Michael Chiumento (one of the current owners), under what was then called the Maluchi Development Corporation, closed for \$750,000 on June 5, 2003. That's the only official deal in the books. That's the only sale figure Coffey should have cited. That figure is not based on property appraiser records, on "some software error" or anyone's memo, but on the Clerk of Court's records, and the dock stamp tax Chiumento's company paid on the acquisition. Records show Chiumento changed his corporation's name to Flagler Crossroads around 2005, dropped a couple of partners and took on a couple of new ones, he is the constant. But what business partners conducted among themselves is their business. It never amounted to an official real estate sale of the building itself. No records to show it, no tax trail.

By law, real estate transactions carry a 70-cent per \$100 dock stamp tax on all documents that transfer interest in real property, if we're to believe the Florida Department of Revenue. If you conduct a real estate transaction and don't pay that tax, you're evading taxes. All such transactions must be recorded with the clerk of court. (There are several mortgages under Maluchi-Crossroads's name between 2003 and 2007, which are taxed differently, but taking out mortgages was last decade's pastime.) There is only one transaction taxed at that rate since Maluchi took over, and that's the 2003 transaction.

So either the owners of Flagler Hospital somewhere along the way conducted a \$1.6 million real estate transaction, but didn't pay the tax, or there never was a \$1.6 million sale, and that \$750,000 price is the true price paid for the building, netting its owners the astronomical profit they're now set to reap.

Yet Coffey wants us to trust him and his numbers. Not the media. Not clerk of court and tax records. Just Coffey and his snippets. He wants us to trust him that the old hospital was a prize the county shouldn't let slip away, that the price couldn't have been negotiated down to a less ungodly level, though Chiumento and his partners couldn't find a buyer for it year after year—until the county came along.

I think I'll pass. I'll take the papers over Coffey any day. Lucky for Coffey he has his commissioners exactly where he wants them: in his amen corner. And together they're again making suckers of taxpayers, who'll be paying for this for many years, with more bullet points than could ever fit on a PowerPoint.

Cue the greasy sequel to the potato palace.