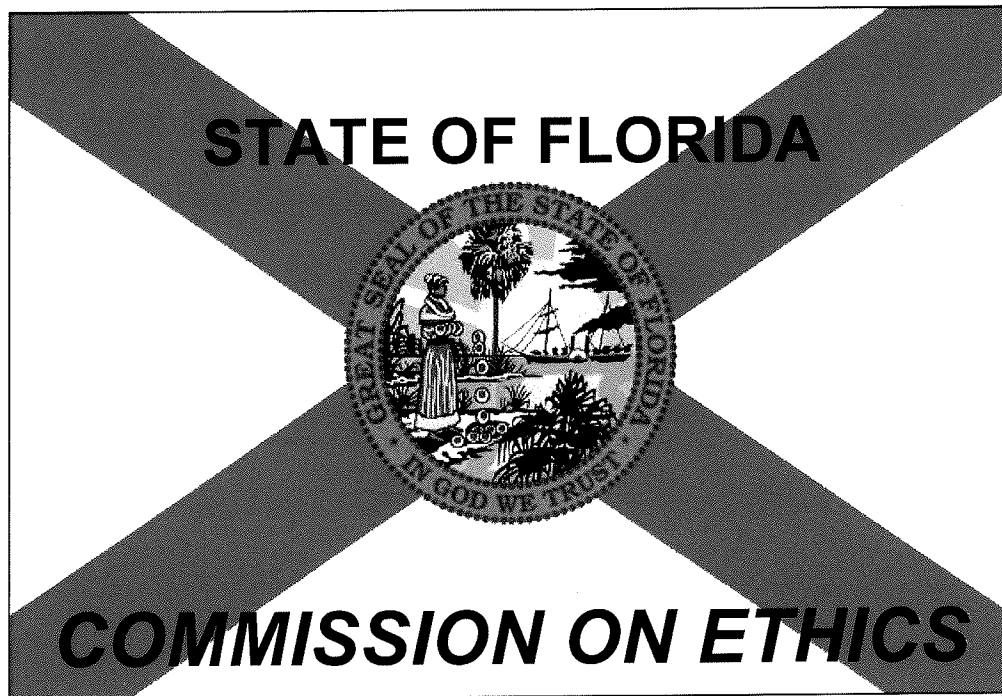


REPORT OF INVESTIGATION



Complaint Number 22-146

NOTICE CONCERNING CONFIDENTIALITY

This report of investigation concerns an alleged violation of Chapter 112, Part III, Florida Statutes, or other breach of public trust under provisions of Article II, Section 8, Florida Constitution. The Report and any exhibits may be confidential (exempt from the public records law) pursuant to Section 112.324, Florida Statutes, and Chapter 34-5, F.A.C., the rules of the Commission on Ethics. Unless the Respondent has waived the confidentiality in writing, this report will remain confidential until one of the following occurs: (1) the complaint is dismissed by the Commission; (2) the Commission finds sufficient evidence to order a public hearing; or (3) the Commission orders a public report as a final disposition of the matter. *See Section 112.3215, Florida Statutes, regarding executive branch lobbying matters and confidentiality.

STATE OF FLORIDA
COMMISSION ON ETHICS
Post Office Drawer 15709
Tallahassee, Florida 32317-5709

REPORT OF INVESTIGATION

TITLE: JENNIE BLACKBURN
Town Commissioner
Redington Shores, FL

COMPLAINT NO.: 22-146
Exhibits A through D

INVESTIGATED BY: Marian Lambeth by D. Keith Powell
Marian Lambeth

Distribution: Commission on Ethics
Respondent
Advocate
File

Releasing Authority: Kerrie J. Stillman
Kerrie J. Stillman
Executive Director

January 20, 2023
Date

* * * *

**REPORT OF INVESTIGATION
COMPLAINT NO. 22-146**

(1) Ms. Mary Palmer of St. Petersburg, Florida, alleges that Ms. Jennie Blackburn, a Commissioner (District 1) for the Town of Redington Shores, Florida, violated the Code of Ethics for Public Officers and Employees.

(2) The complaint contains several allegations concerning the Respondent's CE Form 1, Statement of Financial Interests, for the years 2020 and 2021. Specifically, the complaint alleges the Respondent failed to select a manner of calculating reportable interests on her 2020 Form 1. The Complainant next alleges the Respondent failed to disclose income from Oversight Capital, LLC, and Blackburn Coastal Services, LLC, in 2020 and 2021. The Complainant also alleges the Respondent failed to disclose her checking and savings accounts in 2020 and 2021. The Complainant also alleges that the Respondent failed to disclose major customers and clients of Oversight Capital, LLC and Blackburn Coastal Services, LLC, in 2020 and 2021. The complaint further alleges that the Respondent failed to disclose a mortgage exceeding \$500,000 as a liability and capitalized items from a loan modification exceeding \$10,000 as income, both with Quicken Loans, in 2021.

(3) The Executive Director of the Commission on Ethics noted that based upon the information provided in the complaint, the above-referenced allegations were sufficient to warrant a preliminary investigation to determine whether the Respondent's actions violated Sections 112.3145, Florida Statutes (Disclosure of Financial Interests).

Background

(4) The Respondent advised by telephone that she holds a Bachelor's degree in Marketing from the University of Missouri, and a Florida Real Estate License. In 2007, she joined her husband in his real estate business, Oversight Capital LLC, doing business as Blackburn Coastal Realty. She said she is a 50% partner in the business. The Respondent explained that she independently completed her 2020 CE Form 1 (Exhibit A) but was pressured to complete it quickly, and thus did not take the time to read the instructions. She estimated it took her approximately 10 to 15 minutes to complete the 2020 CE Form 1. In 2021, the Respondent said she sought the assistance of her husband and he read the instructions. The 2021 CE Form 1 (Exhibit B) she said took her approximately two hours to complete. Subsequent to the instant complaint, the Respondent submitted an Amendment to Statement of Financial Interests Form 1X for both 2020 (Exhibit C) and 2021 (Exhibit D).

**The Allegation that the Respondent failed to select a manner of calculating
reportable interests on her 2020 CE Form 1**

(5) The Complainant alleges that on the Respondent's 2020 CE Form 1 failed to indicate the manner used for calculating reportable interests.

(6) CE Form 1 instructions, provided with the form, state, "Filers have the option of reporting based on either thresholds that are comparative (usually, based on percentage

values) or thresholds that are based on absolute dollar values....Check the box that reflects the choice you have made. You must use the type of threshold you have chosen for each part of the form."

(7) A review of Respondent's 2020 CE Form 1 Statement of Financial Interests confirms she did not mark either the dollar or comparative value threshold as required by the form instructions. The Respondent explained she was a new commissioner and received no training or guidance when she completed the form, thus she was unsure of which box to select. As was previously noted, on October 27, 2022, the Respondent submitted a CE Form 1X "Amendment to Statement of Financial Interests" selecting "Dollar Value Thresholds" as the manner used for her calculations reported.

(8) During a telephone interview, the Respondent acknowledged she did not choose a manner of calculating her interests when completing her 2020 CE Form 1. She added, in 2020, she was newly elected and was directed by the Complainant, who also serves as the Town Clerk, to complete the form quickly.

The Allegation that the Respondent failed to disclose income from Oversight Capital, LLC, and Blackburn Coastal Services, LLC in 2020 and 2021

(9) As reflected on the CE Form 1 instructions for "Part A — Primary Sources of Income," the principal source of income for the filer during the disclosure period is to be reported. Public salaries are not required to be disclosed and the income of a spouse need not be disclosed unless there is joint income from jointly owned property. A primary source of income is the source of any gross income for purposes of Federal income tax. Any income that exceeded \$2,500 received by the filer, or by any other person for the filer's use or benefit, must be reported, under the Dollar Value threshold. Under the Comparative Value threshold, any income exceeding 5% of the filer's total gross income must be reported.

In Part A of her 2020 CE Form 1, the Respondent reported her Primary Sources of Income as:

Primary Source of Income	Description
Town of Redington Shores Social Security Blackburn Coastal Realty	Municipality US Government Real Estate Brokerage

In Part A of her 2021 CE Form 1, the Respondent reported her Primary Sources of income as:

Primary Source of Income	Description
Town of Redington Shores Social Security	Commissioner Retirement

Oversight Capital, LLC	d/b/a Blackburn Coastal Realty
------------------------	--------------------------------

(10) On her 2020 CE Form 1X (Exhibit C), under Part A - Primary Sources of Income, the Respondent entered "*See attached.*" The Respondent clarified in her 2020 CE Form 1X, "On my original financial disclosure form, I listed Blackburn Coastal Realty under Primary Source of Income because that is the business name most known to the public & the name on all our marketing material. On Form 1X, I corrected the name to Oversight Capital LLC d/b/a/ Blackburn Coastal Realty."

(11) On her 2021 CE Form 1X (Exhibit D), under Part A - Primary Sources of Income, the Respondent entered "*See attached.*" There is no change in the primary sources of income listed from what was listed in Respondent's original 2021 CE Form 1 filing.

(12) On her 2020 CE Form 1, The Respondent entered "NA" under "Part B – Secondary Sources of Income." There is no change in what she reported on her 2020 CE Form 1X.

(13) On her 2021 CE Form 1, the Respondent listed a secondary source of income as "Oversight Capital LLC, d/b/a Blackburn Coastal Realty." On her 2021 CE Form 1X, the Respondent entered "*see attached*" under the secondary source of income. The attachment indicates "Michael Saunder & Co" as a Major Source of Business Income for Oversight Capitol (Exhibit D, page 3).

(14) In a response to the complaint, Respondent stated she did not fail to disclose a primary source of income. She explained that in 2020, she did not use the corporate name Oversight Capital, LLC, but rather used the "marketing name" of Blackburn Coastal Realty by which her business is commonly known. On her CE Form 1 for 2021, which she spent more time completing, the Respondent entered the corporate name of Oversight Capital as a primary source of income and "d/b/a Blackburn Coastal Realty" as the description, in an attempt to identify the source as it is more commonly known. The Respondent explained she choose this nomenclature to clearly indicate her source of income. She described the source as "Real Estate Brokerage" as it is titled with the Florida Department of Business and Professional Regulation, the local Board of Realtors, and at all real estate closings.

(15) The Respondent explained that, as a real estate agent, she uses a tag line on her signature to identify her as being a staging design agent. This certification is beneficial for a real estate professional and stated that staging services are encompassed within her services as a real estate agent to help her customers obtain more for their property.

The Allegation that the Respondent failed to disclose checking and savings accounts

(16) As reflected in the CE Form instructions, "Intangible Personal Property" is defined as property that at any time during the disclosure period was worth more than \$10,000, and specific qualifying items are listed for example.

(17) In "Part D – Intangible Personal Property" of her 2020 CE Form 1, the Respondent wrote "NA."

(18) In "Part D – Intangible Personal Property" of her 2021 CE Form 1, the Respondent reported "cash on hand."

(19) On October 27, 2022, the Respondent submitted a CE Form 1X to the Commission on Ethics for the years 2020 and 2021 and disclosed Intangible Property as a personal checking/savings account, a business checking/savings account, and a money market account for both years.

The Allegation that the Respondent failed to disclose major customers and clients

(20) As reflected in the CE Form 1 instructions, "Secondary Sources of Income" is income from major customers, clients, and other sources of income to businesses in which the filer owns an interests. Reporting of secondary income is required under the Dollar Value threshold if, during the reporting period, the Respondent owned, directly or indirectly, equitable or beneficial interest of more than 5% of the total assets or capital stock of a business entity (such as an LLC or DBA), *and* received more than \$5,000 in gross income from that business entity. If a filer's ownership interest and gross income from the business entity exceeded these thresholds, then every source of the income to the business entity that exceeded 10% of the business entity's gross income must be disclosed.

(21) The Respondent confirmed that, in 2021, one customer, Michael Saunder & Co, exceeded the threshold. As has been noted, the Respondent submitted a CE Form 1X for 2021 reporting "Michael Saunders & Co" as a major customer/source of income during 2021.

The Allegation that the Respondent failed to disclose a liability and capitalized funds

(22) As reflected in the CE Form 1 instructions, filers must list the name and address of each creditor to whom more than \$10,000 is owed at any time during the disclosure period. The instructions note that a filer is "not required to disclose credit card debt and retail installment accounts, taxes owed (unless reduced to a judgment), indebtedness on a life insurance policy owed to the company of issuance, or contingent liabilities."

(23) On her 2020 CE Form 1, under "Part E — Liabilities," the Respondent wrote, "Rocket Mortgage, Detroit, MI."

(24) On her 2021 CE Form 1, under "Part E — Liabilities," the Respondent wrote, "none."

(25) The Respondent's CE Form 1Xs, for filing years 2020 and 2021, reflect "Rocket Mortgage LLC, 1050 Woodward Ave Detroit, MI 48226" and "Bank of America, 6801 Seminole Blvd, Seminole, FL 33772," as creditors to whom she owed more than \$10,000 for both 2020 and 2021.

(26) The Respondent explained she wrote "none" on her 2021 CE Form 1 under the liabilities section because she interpreted the instructions at that as stating a liability related to

a primary residence (Rocket Mortgage) was not required to be disclosed. The Bank of America debt reported on the Respondent's 2020 and 2021 CE Form1X's is credit card debt.

(27) As to the Complainant's allegation that there were capitalized funds which were not disclosed, the Respondent explained when there are capitalized funds, the mortgage company must provide an Internal Revenue Service (IRS) Form 1099-C, specifically related to the cancellation of debt. She said there was no forgiven debt, and, therefore, she never received an IRS Form 1099-C and had nothing to report or 2020 or 2021.

END OF REPORT OF PRELIMINARY INVESTIGATION

EXHIBIT A

EXHIBIT A

FORM 1**STATEMENT OF
FINANCIAL INTERESTS****2020**

FOR OFFICE USE ONLY:

Blackburn, Jennie
Commissioner
17717 Gulf Blvd Unit 202
Redington Shores, FL 33708

SUPERVISOR OF ELECTIONS
ELECTION SERVICE CENTER

2021 JUN -3 PM 4:50

RECEIVED

CHECK ONLY IF ☐ CANDIDATE OR ☐ NEW EMPLOYEE OR APPOINTEE*** THIS SECTION MUST BE COMPLETED *****DISCLOSURE PERIOD:**

THIS STATEMENT REFLECTS YOUR FINANCIAL INTERESTS FOR CALENDAR YEAR ENDING DECEMBER 31, 2020.

MANNER OF CALCULATING REPORTABLE INTERESTS:

FILERS HAVE THE OPTION OF USING REPORTING THRESHOLDS THAT ARE ABSOLUTE DOLLAR VALUES, WHICH REQUIRES FEWER CALCULATIONS, OR USING COMPARATIVE THRESHOLDS, WHICH ARE USUALLY BASED ON PERCENTAGE VALUES (see instructions for further details). CHECK THE ONE YOU ARE USING (must check one):

☐ COMPARATIVE (PERCENTAGE) THRESHOLDS OR ☐ DOLLAR VALUE THRESHOLDS**PART A -- PRIMARY SOURCES OF INCOME** [Major sources of income to the reporting person - See instructions]

(If you have nothing to report, write "none" or "n/a")

NAME OF SOURCE OF INCOME	SOURCE'S ADDRESS	DESCRIPTION OF THE SOURCE'S PRINCIPAL BUSINESS ACTIVITY
Town of Redington Shores	17425 Gulf Blvd	Municipality
Social Security	Washington, DC	U.S. Government
Blackburn Coastal Realty	17717 Gulf Blvd #202	Real Estate Brokerage

PART B -- SECONDARY SOURCES OF INCOME

[Major customers, clients, and other sources of income to businesses owned by the reporting person - See instructions]

(If you have nothing to report, write "none" or "n/a")

NAME OF BUSINESS ENTITY	NAME OF MAJOR SOURCES OF BUSINESS' INCOME	ADDRESS OF SOURCE	PRINCIPAL BUSINESS ACTIVITY OF SOURCE
N/A			

PART C -- REAL PROPERTY [Land, buildings owned by the reporting person - See instructions]

(If you have nothing to report, write "none" or "n/a")

17717 Gulf Blvd #202 Redington Shores FL 33708

You are not limited to the space on the lines on this form. Attach additional sheets, if necessary.

FILING INSTRUCTIONS for when and where to file this form are located at the bottom of page 2.

INSTRUCTIONS on who must file this form and how to fill it out begin on page 3.

PART D — INTANGIBLE PERSONAL PROPERTY [Stocks, bonds, certificates of deposit, etc. - See instructions]
(If you have nothing to report, write "none" or "n/a")

TYPE OF INTANGIBLE

BUSINESS ENTITY TO WHICH THE PROPERTY RELATES

N/A

PART E — LIABILITIES [Major debts - See instructions]
(If you have nothing to report, write "none" or "n/a")

NAME OF CREDITOR

ADDRESS OF CREDITOR

Rocket Mortgage

Detroit, MI

PART F — INTERESTS IN SPECIFIED BUSINESSES [Ownership or positions in certain types of businesses - See instructions]
(If you have nothing to report, write "none" or "n/a")

BUSINESS ENTITY # 1

BUSINESS ENTITY # 2

NAME OF BUSINESS ENTITY

ADDRESS OF BUSINESS ENTITY

PRINCIPAL BUSINESS ACTIVITY

POSITION HELD WITH ENTITY

I OWN MORE THAN A 5% INTEREST IN THE BUSINESS

NATURE OF MY OWNERSHIP INTEREST

N/A

PART G — TRAINING For elected municipal officers, appointed school superintendents, and commissioners of a community redevelopment agency created under Part III, Chapter 163 required to complete annual ethics training pursuant to section 112.3142, F.S.

☒ I CERTIFY THAT I HAVE COMPLETED THE REQUIRED TRAINING.

IF ANY OF PARTS A THROUGH G ARE CONTINUED ON A SEPARATE SHEET, PLEASE CHECK HERE ☐

SIGNATURE OF FILER:

Signature:

Jessie Blodgett

Date Signed:

5/28/21

CPA or ATTORNEY SIGNATURE ONLY

If a certified public accountant licensed under Chapter 473, or attorney in good standing with the Florida Bar prepared this form for you, he or she must complete the following statement:

I, _____, prepared the CE Form 1 in accordance with Section 112.3145, Florida Statutes, and the instructions to the form. Upon my reasonable knowledge and belief, the disclosure herein is true and correct.

CPA/Attorney Signature: _____

Date Signed: _____

FILING INSTRUCTIONS:

If you were mailed the form by the Commission on Ethics or a County Supervisor of Elections for your annual disclosure filing, return the form to that location. To determine what category your position falls under, see page 3 of instructions.

Local officers/employees file with the Supervisor of Elections of the county in which they permanently reside. (If you do not permanently reside in Florida, file with the Supervisor of the county where your agency has its headquarters.) Form 1 filers who file with the Supervisor of Elections may file by mail or email. Contact your Supervisor of Elections for the mailing address or email address to use. Do not email your form to the Commission on Ethics, it will be returned.

State officers or specified state employees who file with the Commission on Ethics may file by mail or email. To file by mail, send the completed form to P.O. Drawer 15709, Tallahassee, FL 32317-5709; physical address: 325 John Knox Rd, Bldg E, Ste 200, Tallahassee, FL 32303. To file with the Commission by email, scan your completed form and any attachments as a pdf (do not use any other format), send it to CEForm1@leg.state.fl.us and retain a copy for your records. Do not file by both mail and email. Choose only one filing method. Form 6s will not be accepted via email.

Candidates file this form together with their filing papers.

MULTIPLE FILING UNNECESSARY: A candidate who files a Form 1 with a qualifying officer is not required to file with the Commission or Supervisor of Elections.

WHEN TO FILE: Initially, each local officer/employee, state officer, and specified state employee must file **within 30 days** of the date of his or her appointment or of the beginning of employment. Appointees who must be confirmed by the Senate must file prior to confirmation, even if that is less than 30 days from the date of their appointment.

Candidates must file at the same time they file their qualifying papers.

Thereafter, file by July 1 following each calendar year in which they hold their positions.

Finally, file a final disclosure form (Form 1F) within 60 days of leaving office or employment. Filing a CE Form 1F (Final Statement of Financial Interests) does not relieve the filer of filing a CE Form 1 if the filer was in his or her position on December 31, 2020.

AD

EXHIBIT B

EXHIBIT B

Jennie Blackburn

✓
VR

FORM 1

STATEMENT OF
FINANCIAL INTERESTS

2021

FOR OFFICE USE ONLY:

Blackburn, Jennie

Redington Shores

CHECK ONLY IF ☐ CANDIDATE OR ☐ NEW EMPLOYEE OR APPOINTEE**** THIS SECTION MUST BE COMPLETED ****

DISCLOSURE PERIOD:

THIS STATEMENT REFLECTS YOUR FINANCIAL INTERESTS FOR CALENDAR YEAR ENDING DECEMBER 31, 2021.

MANNER OF CALCULATING REPORTABLE INTERESTS:

FILERS HAVE THE OPTION OF USING REPORTING THRESHOLDS THAT ARE ABSOLUTE DOLLAR VALUES, WHICH REQUIRES FEWER CALCULATIONS, OR USING COMPARATIVE THRESHOLDS, WHICH ARE USUALLY BASED ON PERCENTAGE VALUES (see instructions for further details). CHECK THE ONE YOU ARE USING (must check one):

☐ COMPARATIVE (PERCENTAGE) THRESHOLDS OR ☒ DOLLAR VALUE THRESHOLDS

PART A -- PRIMARY SOURCES OF INCOME [Major sources of income to the reporting person - See instructions]
 (If you have nothing to report, write "none" or "n/a")

NAME OF SOURCE OF INCOME	SOURCE'S ADDRESS	DESCRIPTION OF THE SOURCE'S PRINCIPAL BUSINESS ACTIVITY
Town of Redington Shores, FL	Town Hall Redington Shores	Commissioner
Social Security	US Treasury	Retirement
OverSight Capital, LLC	17717 Gulf Blvd #202 Redington Shores, FL	d/b/a Blackburn Coastal Realty

PART B -- SECONDARY SOURCES OF INCOME

 [Major customers, clients, and other sources of income to businesses owned by the reporting person - See instructions]
 (If you have nothing to report, write "none" or "n/a")

NAME OF BUSINESS ENTITY	NAME OF MAJOR SOURCES OF BUSINESS' INCOME	ADDRESS OF SOURCE	PRINCIPAL BUSINESS ACTIVITY OF SOURCE
OverSight Capital LLC	d/b/a Blackburn Coastal Realty	17717 Gulf Blvd #202 Redington Shores, FL 33708	Real Estate Sales

PART C -- REAL PROPERTY [Land, buildings owned by the reporting person - See instructions]
 (If you have nothing to report, write "none" or "n/a")

You are not limited to the space on the lines on this form. Attach additional sheets, if necessary.

FILING INSTRUCTIONS for when and where to file this form are located at the bottom of page 2.

INSTRUCTIONS on who must file this form and how to fill it out begin on page 3.

None

Jennie Blackburn (con't.)

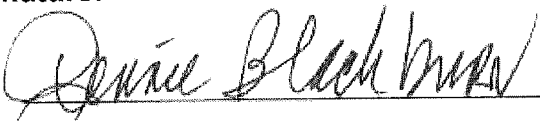
PART D — INTANGIBLE PERSONAL PROPERTY [Stocks, bonds, certificates of deposit, etc. - See instructions] (If you have nothing to report, write "none" or "n/a")	
TYPE OF INTANGIBLE	BUSINESS ENTITY TO WHICH THE PROPERTY RELATES
CASH on Hand	Personal
PART E — LIABILITIES [Major debts - See instructions] (If you have nothing to report, write "none" or "n/a")	
NAME OF CREDITOR	ADDRESS OF CREDITOR
None	
PART F — INTERESTS IN SPECIFIED BUSINESSES [Ownership or positions in certain types of businesses - See instructions] (If you have nothing to report, write "none" or "n/a")	
	BUSINESS ENTITY # 1
NAME OF BUSINESS ENTITY	oversight Capital, LLC
ADDRESS OF BUSINESS ENTITY	1717 W. Blvd. #100, Redding, Shores, FL
PRINCIPAL BUSINESS ACTIVITY	Blackburn Coastal Realty
POSITION HELD WITH ENTITY	OWNER / Sales of Real Estate
I OWN MORE THAN A 5% INTEREST IN THE BUSINESS	YES
NATURE OF MY OWNERSHIP INTEREST	50% owner
PART G — TRAINING For elected municipal officers, appointed school superintendents, and commissioners of a community redevelopment agency created under Part III, Chapter 163 required to complete annual ethics training pursuant to section 112.3142, F.S.	
<input checked="" type="checkbox"/> I CERTIFY THAT I HAVE COMPLETED THE REQUIRED TRAINING.	
IF ANY OF PARTS A THROUGH G ARE CONTINUED ON A SEPARATE SHEET, PLEASE CHECK HERE <input type="checkbox"/>	
SIGNATURE OF FILER:	
Signature: 	
Date Signed: 6/23/22	
CPA or ATTORNEY SIGNATURE ONLY	
If a certified public accountant licensed under Chapter 473, or attorney in good standing with the Florida Bar prepared this form for you, he or she must complete the following statement:	
I, _____, prepared the CE Form 1 in accordance with Section 112.3145, Florida Statutes, and the instructions to the form. Upon my reasonable knowledge and belief, the disclosure herein is true and correct.	
CPA/Attorney Signature: _____	
Date Signed: _____	
FILING INSTRUCTIONS:	
If you were mailed the form by the Commission on Ethics or a County Supervisor of Elections for your annual disclosure filing, return the form to that location. To determine what category your position falls under, see page 3 of instructions.	
Local officers/employees file with the Supervisor of Elections of the county in which they permanently reside. (If you do not permanently reside in Florida, file with the Supervisor of the county where your agency has its headquarters.) Form 1 filers who file with the Supervisor of Elections may file by mail or email. Contact your Supervisor of Elections for the mailing address or email address to use. <u>Do not email your form to the Commission on Ethics. It will be returned.</u>	
State officers or specified state employees who file with the Commission on Ethics may file by mail or email. To file by mail, send the completed form to P.O. Drawer 15709, Tallahassee, FL 32317-5709; physical address: 325 John Knox Rd, Bldg E, Ste 200, Tallahassee, FL 32303. To file with the Commission by email, scan your completed form and any attachments as a pdf (do not use any other format), send it to CEForm1@leg.state.fl.us and retain a copy for your records. <u>Do not file by both mail and email. Choose only one filing method.</u> Form 6s will not be accepted via email.	
Candidates file this form together with their filing papers.	
MULTIPLE FILING UNNECESSARY: A candidate who files a Form 1 with a qualifying officer is not required to file with the Commission or Supervisor of Elections.	
WHEN TO FILE: Initially, each local officer/employee, state officer, and specified state employee must file within 30 days of the date of his or her appointment or of the beginning of employment. Appointees who must be confirmed by the Senate must file prior to confirmation, even if that is less than 30 days from the date of their appointment.	
Candidates must file at the same time they file their qualifying papers.	
Thereafter, file by July 1 following each calendar year in which they hold their positions.	
Finally, file a final disclosure form (Form 1F) within 60 days of leaving office or employment. Filing a CE Form 1F (Final Statement of Financial Interests) does <u>not</u> relieve the filer of filing a CE Form 1 if the filer was in his or her position on December 31, 2021.	

EXHIBIT C

EXHIBIT C

FORM 1X

AMENDMENT TO

STATEMENT OF FINANCIAL INTERESTS

RECEIVED

LAST NAME - FIRST NAME - MIDDLE NAME
(Same as on original Form 1):

Blackburn, Jennie Lynn

MAILING ADDRESS:

17717 Gulf Blvd

Unit 202

CITY:

ZIP:

COUNTY:

Redington Shores

FL

33708

◆ THIS FORM AMENDS THE (Choose one)



FORM 1 I FILED FOR THE YEAR: 2020

(Use a separate Form 1X for each Form 1 you are amending)



FORM 1F I FILED FOR THE PERIOD

January 1, _____ THROUGH _____

(Must be between January 1 of the last year in which you held public office or employment and the last date you held that office or employment.)

◆ DURING THAT YEAR, I HELD, OR WAS A CANDIDATE FOR, THE POSITION OF: District 1 Commissioner

◆ WITH THIS GOVERNMENTAL AGENCY: _____

Town of Redington Shores

MANNER OF CALCULATING REPORTABLE INTERESTS:

FILERS HAVE THE OPTION OF USING REPORTING THRESHOLDS THAT ARE ABSOLUTE DOLLAR VALUES, WHICH REQUIRES FEWER CALCULATIONS, OR USING COMPARATIVE THRESHOLDS, WHICH ARE USUALLY BASED ON PERCENTAGE VALUES (see instructions for further details). CHECK THE ONE YOU ARE USING (must check one):



COMPARATIVE (PERCENTAGE) THRESHOLDS

OR



DOLLAR VALUE THRESHOLDS

PART A -- PRIMARY SOURCES OF INCOME [Major sources of income to the reporting person - See instructions]
(If you have nothing to report, write "none" or "n/a")

NAME OF SOURCE OF INCOME	SOURCE'S ADDRESS	DESCRIPTION OF THE SOURCE'S PRINCIPAL BUSINESS ACTIVITY
See attached		

PART B -- SECONDARY SOURCES OF INCOME

[Major customers, clients, and other sources of income to businesses owned by the reporting person - See instructions]

(If you have nothing to report, write "none" or "n/a")

NAME OF BUSINESS ENTITY	NAME OF MAJOR SOURCES OF BUSINESS'S INCOME	ADDRESS OF SOURCE	PRINCIPAL BUSINESS ACTIVITY OF SOURCE
See attached			

PART C -- REAL PROPERTY [Land, buildings owned by the reporting person - See instructions]

(If you have nothing to report, write "none" or "n/a")

17717 Gulf Blvd #202 Redington Shores FL 33708

PART D -- INTANGIBLE PERSONAL PROPERTY [Stocks, bonds, certificates of deposit, etc. - See instructions]

(If you have nothing to report, write "none" or "n/a")

TYPE OF INTANGIBLE	BUSINESS ENTITY TO WHICH THE PROPERTY RELATES
Checking & Savings (personal)	Bank of America
Money Market (personal)	TD Ameritrade
Checking & Savings (business)	Bank of America/Oversight Capital, LLC d/b/a Blackburn Coastal Realty

PART E — LIABILITIES [Major debts - See instructions]
(If you have nothing to report, write "none" or "n/a")

NAME OF CREDITOR	ADDRESS OF CREDITOR
Rocket Mortgage LLC	1050 Woodward Ave Detroit MI 48226
Bank of America	6801 Seminole Blvd Seminole FL 33772

PART F — INTERESTS IN SPECIFIED BUSINESSES [Ownership or positions in certain types of businesses - See instructions]
(If you have nothing to report, write "none" or "n/a")

	BUSINESS ENTITY # 1	BUSINESS ENTITY # 2
NAME OF BUSINESS ENTITY	n/a	
ADDRESS OF BUSINESS ENTITY		
PRINCIPAL BUSINESS ACTIVITY		
POSITION HELD WITH ENTITY		
I OWN MORE THAN A 5% INTEREST IN THE BUSINESS		
NATURE OF MY OWNERSHIP INTEREST		

PART G — TRAINING For elected municipal officers, appointed school superintendents, and commissioners of a community redevelopment agency created under Part III, Chapter 163 required to complete annual ethics training pursuant to section 112.3142, F.S.

☒ I CERTIFY THAT I HAVE COMPLETED THE REQUIRED TRAINING.

PART H — EXPLANATION OF CHANGES

See attached

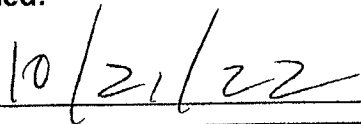
IF ANY OF PARTS A THROUGH H ARE CONTINUED ON A SEPARATE SHEET, PLEASE CHECK HERE ☒

SIGNATURE OF FILER:

Signature:



Date Signed:



CPA or ATTORNEY SIGNATURE ONLY

If a certified public accountant licensed under Chapter 473, or attorney in good standing with the Florida Bar prepared this form for you, he or she must complete the following statement:

I, _____, prepared the CE Form 1 in accordance with Section 112.3145, Florida Statutes, and the instructions to the form. Upon my reasonable knowledge and belief, the disclosure herein is true and correct.

CPA/Attorney Signature _____

Date Signed _____

FILING INSTRUCTIONS:

Return the form to the location where you filed the Form 1 or 1F that you are seeking to amend.

Local officers file with the Supervisor of Elections of the county in which they permanently reside. (If you do not permanently reside in Florida, file with the Supervisor of the county where your agency has its headquarters.) Form 1 filers who file with the Supervisor of Elections may file by mail or email. Contact your Supervisor of Elections for the mailing address or email address to use. Do not email your form to the Commission on Ethics. It will be returned.

State officers or specified state employees' who file with the Commission on Ethics may file by mail or email. To file by mail, send the completed form to P.O. Drawer 15709, Tallahassee, FL 32317-5709; physical address: 325 John Knox Rd, Bldg E, Ste 200, Tallahassee, FL 32303. To file with the Commission by email, scan your completed form and any attachments as a pdf (do not use any other format), send it to CEForm1@leg.state.fl.us and retain a copy for your records. Do not file by both mail and email. Choose only one filing method.

Candidates should have filed their Form 1 together with their qualifying papers.

QUESTIONS:

About this form or the ethics laws may be addressed to the Commission on Ethics, Post Office Drawer 15709, Tallahassee, Florida 32317-5709; physical address: 325 John Knox Road, Bldg E, Ste 200, Tallahassee, FL 32303; telephone (850) 488-7864.

Form 1x 2020 Supplement

2020 Form 1X Part A PRIMARY SOURCES OF INCOME

Name of Source of Income	Source's Address	Principal Business Activity
Social Security Administration	1100 W High Rise Baltimore MD 21235	United States Federal Government- Benefits Administration
Oversight Capital LLC d/b/a Blackburn Coastal Realty	17717 Gulf Blvd #202 Redington Shores FL 33708	Real Estate
Town of Redington Shores	17425 Gulf Blvd Redington Shores FL 33708	Local Government

2020 Form 1X Part B SECONDARY SOURCES OF INCOME

Name of Business Entity	Name of Major Sources of Business's Income	Address of Source	Principal Business Activity of Source
Oversight Capital LLC d/b/a Blackburn Coastal Realty	n/a*	n/a	n/a

*no individuals or companies or other sources of income comprised more than 10% of 2020 gross revenue for Oversight Capital LLC d/b/a Blackburn Coastal Realty in which I own more than 5% interest.

2020 Form 1X Part H EXPLANATION OF CHANGES

Manner of Calculating Reportable Interests

At that time in 2020, I wasn't sure which box to check & I was told I must submit it right away, so I left it blank rather than check the wrong box. Not an excuse, but a factor is that when I filled out the 2020 Financial Disclosure Form, I was a brand-new Commissioner & we were on COVID-19 lockdown. I received no guidance on this from the Town Clerk or the Mayor-Commissioner.

Part A Primary Sources of Income

On my original financial disclosure form, I listed Blackburn Coastal Realty under Primary Source of Income because that is the business name most known to the public & the name on all our marketing material. On Form 1X, I corrected the name to Oversight Capital LLC d/b/a Blackburn Coastal Realty.

Part B Secondary Sources of Income

On my original 2020 financial disclosure I wrote N/A in Part B, secondary sources of income because I thought I had listed all of them in Part A. I own more than 5% of Oversight Capital LLC. No individuals or companies or other sources of income to Oversight Capital LLC comprised more than 10% of the company's gross revenue in 2020.

Part D Intangible Personal Property

I did not list my checking & savings accounts in Part D because they were not included in the examples listed in the form: stocks, bonds, certificates of deposit. The form also states "see instructions" and I apparently did not do that. If I had, I would have included checking and savings accounts in Part D. It has been corrected on Form 1X.

Part E Liabilities

I did not list the full address of my mortgage company and I forgot to include my VISA credit card through Bank of America. Corrected on Form 1X.

EXHIBIT D

EXHIBIT D

FORM 1X

AMENDMENT TO

STATEMENT OF FINANCIAL INTERESTS

2022 OCT 27 PM 5:30

ELECTIONS
SERVICE CENTERLAST NAME - FIRST NAME - MIDDLE NAME
(Same as on original Form 1):

Blackburn, Jennie Lynn

MAILING ADDRESS:

17717 Gulf Blvd

Unit 202

CITY:

ZIP:

COUNTY:

Redington Shores

FL

33708

◆ THIS FORM AMENDS THE (Choose one)



FORM 1 I FILED FOR THE YEAR: 2021

(Use a separate Form 1X for each Form 1 you are amending.)



FORM 1 IF I FILED FOR THE PERIOD

January 1, _____ THROUGH _____

(Must be between January 1 of the last year in which you held public office or employment and the last date you held that office or employment.)

◆ DURING THAT YEAR, I HELD, OR WAS A CANDIDATE FOR, THE
POSITION OF: Commissioner, District 1

◆ WITH THIS GOVERNMENTAL AGENCY: _____

Town of Redington Shores

MANNER OF CALCULATING REPORTABLE INTERESTS:

FILERS HAVE THE OPTION OF USING REPORTING THRESHOLDS THAT ARE ABSOLUTE DOLLAR VALUES, WHICH REQUIRES FEWER CALCULATIONS, OR USING COMPARATIVE THRESHOLDS, WHICH ARE USUALLY BASED ON PERCENTAGE VALUES (see instructions for further details). CHECK THE ONE YOU ARE USING (must check one):



COMPARATIVE (PERCENTAGE) THRESHOLDS

OR



DOLLAR VALUE THRESHOLDS

PART A -- PRIMARY SOURCES OF INCOME [Major sources of income to the reporting person - See instructions]

(If you have nothing to report, write "none" or "n/a")

NAME OF SOURCE OF INCOME	SOURCE'S ADDRESS	DESCRIPTION OF THE SOURCE'S PRINCIPAL BUSINESS ACTIVITY
See attached		

PART B -- SECONDARY SOURCES OF INCOME

[Major customers, clients, and other sources of income to businesses owned by the reporting person - See instructions]

(If you have nothing to report, write "none" or "n/a")

NAME OF BUSINESS ENTITY	NAME OF MAJOR SOURCES OF BUSINESS'S INCOME	ADDRESS OF SOURCE	PRINCIPAL BUSINESS ACTIVITY OF SOURCE
See attached			

PART C -- REAL PROPERTY [Land, buildings owned by the reporting person - See instructions]

(If you have nothing to report, write "none" or "n/a")

17717 Gulf Blvd #202 Redington Shores FL 33708

PART D -- INTANGIBLE PERSONAL PROPERTY [Stocks, bonds, certificates of deposit, etc. - See instructions]

(If you have nothing to report, write "none" or "n/a")

TYPE OF INTANGIBLE	BUSINESS ENTITY TO WHICH THE PROPERTY RELATES
Checking & Savings (Personal)	Bank of America
Checking & Savings (Business)	Bank of America/Oversight Capital LLC d/b/a Blackburn Coastal Realty
Money Market (Personal)	TD Ameritrade

PART E — LIABILITIES [Major debts - See instructions]
(If you have nothing to report, write "none" or "n/a")

NAME OF CREDITOR	ADDRESS OF CREDITOR
Rocket Mortgage LLC	1050 Woodward Ave Detroit MI 48226
Bank of America	6801 Seminole Blvd Seminole FL 33772

PART F — INTERESTS IN SPECIFIED BUSINESSES [Ownership or positions in certain types of businesses - See instructions]
(If you have nothing to report, write "none" or "n/a")

	BUSINESS ENTITY # 1	BUSINESS ENTITY # 2
NAME OF BUSINESS ENTITY	n/a	
ADDRESS OF BUSINESS ENTITY		
PRINCIPAL BUSINESS ACTIVITY		
POSITION HELD WITH ENTITY		
I OWN MORE THAN A 5% INTEREST IN THE BUSINESS		
NATURE OF MY OWNERSHIP INTEREST		

PART G — TRAINING For elected municipal officers, officers, appointed school superintendents, and commissioners of a community redevelopment agency created under Part III, Chapter 163 required to complete annual ethics training pursuant to section 112.3142, F.S.

☒ I CERTIFY THAT I HAVE COMPLETED THE REQUIRED TRAINING.

PART H — EXPLANATION OF CHANGES

See Attached

IF ANY OF PARTS A THROUGH H ARE CONTINUED ON A SEPARATE SHEET, PLEASE CHECK HERE ☒

SIGNATURE OF FILER:

Signature:



Date Signed:



CPA or ATTORNEY SIGNATURE ONLY

If a certified public accountant licensed under Chapter 473, or attorney in good standing with the Florida Bar prepared this form for you, he or she must complete the following statement:

I, _____, prepared the CE Form 1 in accordance with Section 112.3145, Florida Statutes, and the instructions to the form. Upon my reasonable knowledge and belief, the disclosure herein is true and correct.

CPA/Attorney Signature _____

Date Signed _____

FILING INSTRUCTIONS:

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Form 1x 2021 Supplement

2021 Form 1X Part A PRIMARY SOURCES OF INCOME

Name of Source of Income	Source's Address	Principal Business Activity
Social Security Administration	1100 W High Rise Baltimore MD 21235	United States Federal Government- Benefits Administration
Oversight Capital LLC d/b/a Blackburn Coastal Realty	17717 Gulf Blvd #202 Redington Shores FL 33708	Real Estate
Town of Redington Shores	17425 Gulf Blvd Redington Shores FL 33708	Local Government

2021 Form 1X Part B SECONDARY SOURCES OF INCOME

Name of Business Entity	Name of Major Sources of Business Income	Address of Source	Principal Business Activity of Source
Oversight Capital LLC d/b/a Blackburn Coastal Realty	Michael Saunders & Co	5100 Ocean Blvd Sarasota FL 34242	Real Estate

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2021 Form 1X Part H EXPLANATION OF CHANGES

Part B Secondary Sources of Income

On the 2021 financial disclosure form, I did not list the customers or clients that met the threshold for major sources of income of Oversight Capital LLC d/b/a Blackburn Coastal Realty. This was not an attempt to defraud the public, since all of the company's real estate transactions are publicly available. Because the company pays to be a member of the local board of Realtors, Pinellas Realtor Organization, all of its transactions are posted on the Multiple Listing Service which feeds 90+ real estate portals such as Zillow and Trulia, accessible to anyone with an internet connection, as are the Pinellas County Property Appraiser's records for those transactions. In 2021, one transaction met the threshold for major customer & is included on Form 1X 2021.

Part D Intangible Personal Property

I did not list my checking & savings accounts in Part D because they were not included in the examples listed in the form: stocks, bonds, certificates of deposit. The form also states "see instructions" and I apparently did not do that. If I had, I would have included checking and savings accounts in Part D. It has been corrected on Form 1X 2021.

Part E Liabilities

I did not list the full address of my mortgage company and I forgot to include my VISA credit card through Bank of America. Corrected on Form 1X 2021.