

FEB 11 2026

Date: February 6, 2026

Florida Commission on Ethics
P.O. Drawer 15709
Tallahassee, Florida 32317-5709

RECEIVED

ORIGINAL

Re: Correspondence Regarding Ethics Matter

Dear Ms. Kerrie Stillman, Executive Director, and Ms. Millie Fulford, Complaint Coordinator:

I respectfully submit this letter as a formal petition pursuant to section 112.317(7), Florida Statutes, seeking the assessment of reasonable attorney's fees and costs arising from the Commission's dismissal of Complaint No. 25-208 on January 23, 2026. I appreciate the Commission's continued efforts in maintaining ethical standards in public service and its careful review of the allegations asserted in Complaint No. 25-208, which were ultimately determined to be legally insufficient. Notwithstanding the dismissal, the Respondent was compelled to retain legal counsel to defend against allegations that should not have been brought, resulting in unnecessary financial expense. As a direct consequence of the filing of Complaint No. 25-208, the Respondent incurred \$309.20 in defense counsel fees and an additional \$350.00 in attorney's fees associated with the preparation of this petition, both of which are reasonable, documented, and recoverable under the governing statute.

The filing of Complaint No. 25-208 did not occur in isolation but was instead part of a sustained course of personal hostility by the Complainant toward the Respondent that predates the ethics proceedings. This animosity became evident during the October 2023 Long Lake Ranch Community Development District Board meeting, where the Complainant publicly threatened to remove the Respondent from his elected position as a Pasco County CDD Board Supervisor. It was explained at that meeting that the Board possesses no legal authority to remove a duly elected supervisor, rendering the threat baseless and improperly calculated to intimidate. Such conduct further contravened the Resolution of the Board of Supervisors of the Long Lake Ranch Community Development District governing public decorum, which expressly prohibits speakers from launching personal attacks against Board supervisors. This incident is relevant because it establishes the Complainant's motivation as personal retaliation rather than a good-faith concern regarding ethics or compliance.

That pattern continued in January 2025 when the Complainant filed Commission on Ethics Complaint No. 25-048, alleging that the Respondent did not qualify as an employee under Internal Revenue Service definitions. That complaint was dismissed, yet rather than accepting the Commission's determination, the Complainant verbally threatened the Respondent by stating that he would file another ethics complaint. This statement is probative of intent, as it demonstrates that subsequent filings were not grounded in newly discovered facts or legitimate

ethical concerns, but rather in a premeditated effort to harass the Respondent through repeated invocation of the ethics complaint process.

In August 2025, the Complainant carried out that threat by filing Complaint No. 25-208, which the Commission dismissed on January 23, 2026. The record reflects that the Complainant knew or should have known that the allegations contained in Complaint No. 25-208 were false or misleading at the time they were made. The complaint asserted that the Respondent “spent \$8,510 all on his own,” yet the complaint itself included a dated expenditure summary demonstrating that multiple individuals participated in decisions related to those expenditures and that the expenditures were associated with routine district matters such as signage, security measures, consultations with district professionals, and legal research. The Commission expressly recognized this deficiency in its Public Report and Order Dismissing Complaint, filed January 28, 2026, observing that it was not clear how a CDD supervisor seeking clarification or advice from Board counsel on matters relevant to his position could be inconsistent with the proper performance of public duties.

The Complainant’s knowledge of the falsity of these allegations is further evidenced by his own conduct as a fellow CDD Board Supervisor on the same board. The Complainant has personally sought and received legal advice from District Counsel on matters directly related to district operations, as reflected in General Counsel Invoice No. 365890912123-1, which documents a conference with the Complainant regarding Pasco County road ownership and preparation of a towing policy. This evidence establishes that the Complainant was fully aware that consultation with Board counsel is routine, permissible, and appropriate, and that his allegations against the Respondent were therefore inconsistent with established practice and made without probable cause.

As a direct and foreseeable result of the filing of Complaint No. 25-208, the Respondent was required to incur legal expenses to defend against allegations that were ultimately dismissed in their entirety. The assessment of attorney’s fees and costs in this matter is consistent with the purpose of section 112.317(7), Florida Statutes, which exists to deter the misuse of the ethics complaint process as a tool for personal retaliation and to protect public officers from bearing the financial burden of defending against bad-faith complaints. The amounts sought are modest, reasonable, and directly attributable to the Complainant’s actions.

For these reasons, the Respondent respectfully requests that the Commission require the Complainant to reimburse the Respondent in the total amount of \$659.20 for attorney’s fees and costs incurred in connection with Complaint No. 25-208. Thank you for your time, consideration, and continued service in this matter.

Respectfully submitted,

DARRELL C. THOMPSON

Darrell C. Thompson

The Delta

PlayStation 4 - £149.99

\$309.20



Review, Draft and Mail Letter

\$109.20

Fulford, Millie

FEB 16 2026

From: Edward Blair <edward4blair@gmail.com>
Sent: Monday, February 16, 2026 3:17 PM
To: Fulford, Millie
Subject: Complaint 25-208 - More petition evidence.

RECEIVED

Dear Ms. Kerrie Stillman, Executive Director, and Ms. Millie Fulford,
Complaint Coordinator:

Thank you for your government service.

Please confirm you have received this.

Additional petition evidence plus two attached invoices in PDF file
form:

The Complainant's knowledge of the falsity of allegations is further
evidenced by his own conduct as a fellow CDD Board Supervisor on the same
board:

1) The Complainant has personally sought and received legal advice from
District Counsel on matters directly related to district operations, as
reflected in General Counsel Invoice No. 345416112123-1, which documents
8/13/24 "Confer with G. Smith regarding request for supervisor request
report".

2) The Complainant has personally sought and received legal advice from
District Counsel on matters directly related to district operations, as
reflected in General Counsel Invoice No. 347015012123-1, which documents
9/30/24 "Review request from Smith regarding the addition of an election
complaint to October agenda".

These General Counsel Invoices and the previously provided General
Counsel Invoice No. 365890912123-1, are more evidence that establishes that
the Complainant was fully aware that consultation with Board counsel is
routine, permissible, and appropriate, and that his allegations against the
Respondent were therefore inconsistent with established practice and made
without probable cause.

Thank you,
Darrell Thompson
/s/ Edward L. Blair, IV, ESQ.

BLAIR LEGAL SOLUTIONS, LLC

Attorney at Law

Florida Bar No. 1060731

111 N. Orange Ave Ste 800

Orlando, FL 32801

(201) 965-9323

JEREMIAH 1:18 *"For, behold, I have made thee this day a defenced city, and an iron pillar, and brasen walls against the whole land, against the kings of Judah, against the princes thereof, against the priests thereof, and against the people of the land."*

FLORIDA
COMMISSION ON ETHICS

FEB 17 2026

KUTAK ROCK LLP

TALLAHASSEE, FLORIDA

Telephone 404-222-4600

Facsimile 404-222-4654

Federal ID 47-0597598

September 27, 2024

RECEIVED

Check Remit To:

Kutak Rock LLP

PO Box 30057

Omaha, NE 68103-1157

ACH/Wire Transfer Remit To:

ABA #104000016

First National Bank of Omaha

Kutak Rock LLP

A/C # 24690470

Reference: Invoice No. 3454161

Client Matter No. 12123-1

Notification Email: eftgroup@kutakrock.com

Ms. Patricia Thibault
Long Lake Ranch CDD
Breeze
Ste 2000
1540 International Parkway
Lake Mary, FL 32746

Invoice No. 3454161

12123-1

Re: General Counsel

For Professional Legal Services Rendered

08/01/24	S. Sandy	0.60	174.00	Review correspondence from Hodge; confer with Pellan regarding same
08/09/24	S. Sandy	0.80	232.00	1.3 Review landscape RFP documents; confer with Hughes regarding same
08/09/24	D. Wilbourn	0.50	85.00	Update and revise landscape RFP
08/12/24	S. Sandy	1.30	377.00	Confer regarding outstanding Vesta invoices; prepare email to community regarding posting signage and statement regarding public decorum
08/12/24	D. Wilbourn	1.00	170.00	Update and revise landscape RFP
08/13/24	S. Sandy	0.50	145.00	Confer with G. Smith regarding request for supervisor request report
08/15/24	S. Sandy	0.40	116.00	Confer with Thibault and Hughes regarding landscape RFP
08/16/24	S. Sandy	0.10	29.00	Prepare form of anti-human trafficking affidavit

KUTAK ROCK LLP**TALLAHASSEE, FLORIDA**

Telephone 404-222-4600

Facsimile 404-222-4654

Federal ID 47-0597598

October 31, 2024

Check Remit To:

Kutak Rock LLP

PO Box 30057

Omaha, NE 68103-1157

ACH/Wire Transfer Remit To:

ABA #104000016

First National Bank of Omaha

Kutak Rock LLP

A/C # 24690470

Reference: Invoice No. 3470150

Client Matter No. 12123-1

Notification Email: cftgroup@kutakrock.com

Ms. Patricia Thibault
Long Lake Ranch CDD
Breeze
Ste 2000
1540 International Parkway
Lake Mary, FL 32746

Invoice No. 3470150

12123-1

Re: General Counsel

For Professional Legal Services Rendered

09/16/24	S. Sandy	0.50	145.00	Update and revise amenity rules
09/17/24	H. Hurley	1.00	175.00	Review and revise District amenity facility policies
09/18/24	H. Hurley	0.70	122.50	Review various documents pertaining to District
09/18/24	S. Sandy	0.20	58.00	Revise amenity facility policies
09/18/24	S. Sandy	0.10	29.00	Coordinate response to the Florida Office of Economic and Demographic Research's Water and Land Survey
09/23/24	S. Sandy	0.10	29.00	Facilitate response to Florida Department of Management Services' local government retirement plan survey
09/30/24	M. Eckert	0.30	127.50	Analyze FEC complaint
09/30/24	S. Sandy	0.70	203.00	Review request from Smith regarding the addition of an election complaint to October agenda; confer with Thibault regarding same

TOTAL HOURS 3.60

PRIVILEGED AND CONFIDENTIAL
ATTORNEY-CLIENT COMMUNICATION AND/OR WORK PRODUCT

KUTAK ROCK LLP**TALLAHASSEE, FLORIDA**

Telephone 404-222-4600

Facsimile 404-222-4654

Federal ID 47-0597598

November 28, 2025

Check Remit To:

Kutak Rock LLP

PO Box 30057

Omaha, NE 68103-1157

ACH/Wire Transfer Remit To:

ABA #104000016

First National Bank of Omaha

Kutak Rock LLP

A/C # 24690470

Reference: Invoice No. 3658909

Client Matter No. 12123-1

Notification Email: eftgroup@kutakrock.com

Long Lake Ranch CDD

Suite 160

255 Primera Boulevard

Lake Mary, FL 32746

Invoice No. 3658909

12123-1

Re: General Counsel

For Professional Legal Services Rendered

10/01/25	S. Sandy	0.50	152.50	Confer with Cotey regarding SR 54 signage
10/03/25	S. Sandy	0.30	91.50	Review correspondence from Thibault regarding traffic enforcement on public roads; confer regarding same
10/24/25	S. Sandy	0.70	213.50	Confer with G. Smith regarding Pasco County road ownership; prepare towing policy
10/29/25	S. Sandy	0.80	244.00	Review refunding presentation; review and revise towing policy
10/30/25	S. Sandy	0.40	122.00	Confer with Thibault regarding Open Carry application to special districts
10/31/25	S. Sandy	3.10	945.50	Prepare towing policy
TOTAL HOURS		5.80		