

MAR 03 2022

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BEFORE THE  
STATE OF FLORIDA  
COMMISSION ON ETHICS

In re: Tracie Davis  
Respondent.

Complaint No. 20-211

21-159 #1

**PRE-PROBABLE CAUSE  
JOINT STIPULATION OF FACT, LAW, AND RECOMMENDED ORDER**

Respondent, Tracie Davis, and the Advocate for the Florida Commission on Ethics enter into this Pre-Probable Cause Joint Stipulation of Fact, Law, and Recommended Order with respect to the above-styled Complaint. Subject to acceptance by the Commission on Ethics, the parties agree that they enter into this stipulated settlement in lieu of further hearings in this cause. The parties stipulate as follows:

**STIPULATED FINDINGS OF FACT**

1. At all material times to the Complaint, Respondent served as a State Representative, District 13, and therefore, is subject to the provisions of the Code of Ethics for Public Officers and Employees, Part III, Chapter 112, Florida Statutes.
2. On September 16, 2021, a sworn Complaint was filed with the Commission on Ethics alleging that Respondent violated the Code of Ethics.
3. Pursuant to Section 112.322, Florida Statutes, the Executive Director of the Commission on Ethics found that the Complaint was legally sufficient and ordered a Preliminary Investigation of the Complaint for a probable cause determination of whether Respondent had violated the Code of Ethics.
4. The Report of Investigation was released on January 7, 2022.
5. The allegation is:

**Respondent violated Article II, Section 8, Florida Constitution, and Section 112.3144, Florida Statutes, by filing an inaccurate 2020 CE Form 6, "Full and Public Disclosure of Financial Interests."**

**6. On January 19, 2022, the Advocate filed her Advocate's Recommendation in the case recommending that the Commission on Ethics find probable cause to believe Respondent violated Article II, Section 8, Florida Constitution, and Section 112.3144, Florida Statutes.**

**7. Respondent admits the fact as set forth in the Report of Investigation as to the Allegation as incorporated by reference in this Joint Stipulation.**

**8. On January 20, 2022, Respondent filed a CE Form 6X, "Amendment to Full and Public Disclosure of Financial Interests," for the year 2020 correcting the error in the net worth date.**

#### **STIPULATED CONCLUSIONS OF LAW**

**9. Respondent is subject to the provisions of Part III, Chapter 112, Florida Statutes, the Code of Ethics for Public Officers and Employees.**

**10. The Commission on Ethics has jurisdiction over the Complaint as filed in this proceeding and over Respondent.**

**11. Respondent violated Article II, Section 8, Florida Constitution, and Section 112.3144, Florida Statutes, by filing an inaccurate 2020 CE Form 6, "Full and Public Disclosure of Financial Interests."**

**12. Respondent admits the Allegation as set forth in paragraph five (5) of the Stipulated Findings of Fact above.**

#### **STIPULATED RECOMMENDED ORDER**

**13. The Advocate accepts Respondent's stipulation in this proceeding.**

**14. The Advocate and Respondent have entered into this Joint Stipulation and urge the**

**Commission on Ethics to approve it in lieu of further hearings in this cause.**

**15. Therefore, the Advocate recommends that:**

**(a) The Commission on Ethics approve this Joint Stipulation, embodying the stipulations, admissions, and recommendations of the parties;**

**(b) The Commission on Ethics enter a Final Order and Public Report consistent with this Stipulation finding that Respondent violated the Florida Constitution and Section 112.3144, Florida Statutes, and refer the matter to the Speaker of the Florida House of Representatives for action consistent with Section 112.324(4), Florida Statutes;**

#### **FURTHER STIPULATIONS**

**16. Respondent and the Advocate stipulate and covenant that they have freely and voluntarily entered into this Joint Stipulation of Fact, Law, and Recommended Order with full knowledge and understanding of its contents. Respondent and the Advocate further stipulate and covenant that this Joint Stipulation constitutes the full agreement of the parties and that there are no oral or written understandings between the parties other than those contained in this Stipulation of Fact, Law, and Recommended Order.**

**17. Respondent and the Advocate stipulate and covenant that, in consideration of the provisions of this Joint Stipulation of Fact, Law, and Recommended Order, they accept and will comply with the above-referenced Final Order and Public Report of the Commission on Ethics.**

**18. Respondent enters into this Joint Stipulation with the understanding of the seriousness of the violation and gives her assurance that this proceeding has affected the manner in which she conducts herself as a public official in a positive way.**


**19. Respondent and the Advocate stipulate that this Joint Stipulation of Fact, Law, and Recommended Order is submitted to the Commission on Ethics for its consideration and**

ratification. In the event that it is not approved by the Commission on Ethics as written, this document shall be of no purpose and effect and shall not be deemed an admission by Respondent.

20. Effective upon approval of this Pre-Probable Cause Joint Stipulation of Fact, Law, and Recommended Order by the Commission on Ethics, Respondent waives all time, notice, hearing rights, requirements, and entitlements, as to all subsequent hearings in this proceeding. By her signature hereto, Respondent waives any and all confidentiality with respect to these proceedings.

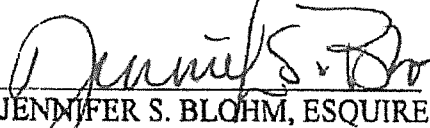
Signed, dated, and entered into:

this 3<sup>rd</sup> day of March, 2022.

  
MELODY A. HADLEY, ESQUIRE  
Advocate for the Florida  
Commission on Ethics  
Florida Bar No. 0636045  
Office of the Attorney General  
The Capitol, PL-01  
Tallahassee, Florida 32399-1050  
850-414-3300

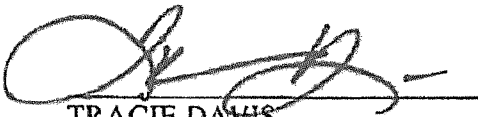
Signed, dated, and entered into:

this 3<sup>rd</sup> day of March, 2022.

  
JENNIFER S. BLOHM, ESQUIRE  
Attorney for Respondent  
Meyer, Blohm and Powell, P.A.  
Florida Bar No. 106290  
P.O. Box 1547  
Tallahassee, Florida 32302  
850-878-5212

Signed, dated, and entered into:

this 3<sup>rd</sup> day of March, 2022.

  
TRACIE DAVIS  
Respondent