

DEC 17 2025

**BEFORE THE
STATE OF FLORIDA
COMMISSION ON ETHICS**

RECEIVED

CONFIDENTIAL

In re: Randal Andrews,

Respondent.

Complaint No.: 25-261

ADVOCATE'S RECOMMENDATION

The undersigned Advocate, after reviewing the Complaint and Report of Investigation filed in this matter, submits this Recommendation in accordance with Rule 34-5.006(3), F.A.C.

RESPONDENT/COMPLAINANT

Respondent, Randal Andrews, serves as the Bradford County Zoning Director.
Complainant is Scott Belford of Keystone Heights, Florida

JURISDICTION

The Executive Director of the Commission on Ethics determined that the Complaint was legally sufficient and ordered a preliminary investigation for a probable cause determination as to whether Respondent violated Article II, Section 8(h)(2), Florida Constitution, and Section 112.313(6), Florida Statutes. The Commission on Ethics has jurisdiction over this matter pursuant to Section 112.322, Florida Statutes.

The Report of Investigation was released on December 3, 2025.

ALLEGATION ONE

Respondent is alleged to have violated Section 112.313(6), Florida Statutes, by using his position to secure a special benefit for himself.

APPLICABLE LAW

Section 112.313(6), Florida Statutes, provides as follows:

MISUSE OF PUBLIC POSITION. No public officer, employee of an agency, or local government attorney shall corruptly use or attempt to use his or her official position or any property or resource which may be within his or her trust, or perform his or her official duties, to secure a special privilege, benefit, or exemption for himself, herself, or others. This section shall not be construed to conflict with s. 104.31.

The term “corruptly” is defined by Section 112.312(9), Florida Statutes, as follows:

“Corruptly” means done with a wrongful intent and for the purpose of obtaining, or compensating or receiving compensation for, any benefit resulting from some act or omission of a public servant which is inconsistent with the proper performance of his or her public duties.

In order to establish a violation of Section 112.313(6), Florida Statutes, the following elements must be proved:

1. Respondent must have been a public officer or employee.
2. Respondent must have:
 - a) used or attempted to use his or her official position or any property or resources within his or her trust,
 - or
 - b) performed his or her official duties.
3. Respondent’s actions must have been taken to secure a special privilege, benefit or exemption for him- or herself or others.
4. Respondent must have acted corruptly, that is, with wrongful intent and for the purpose of benefiting him- or herself or another person from some act or omission which was inconsistent with the proper performance of public duties.

ANALYSIS

Respondent serves as the Bradford County Zoning Director. (ROI 11) His duties include assisting residents and, occasionally, real estate agents, with matters related to zoning. (ROI 11)

On January 25, 2021, Respondent received an unsolicited email at his County email address from realtor Julie Morrow about a potential buyer inquiring about dividing an 18-acre parcel of property owned by Respondent. (ROI , 12, Exhibit A) On January 26, 2021, Respondent responded to the email from his County email providing pertinent zoning and permitting information. (ROI 5, 12, Exhibit A) On June 22, 2022, Respondent used his County-issued email to initiate contact with a prospective buyer and provide details about the property owned by Respondent. (ROI 6, 13, Exhibit B) On October 26 and 27, 2022, Respondent used his County-issued email to initiate communication with Linda Trembley about the potential sale of an 18-acre parcel owned by Respondent. (ROI 7, 14, Exhibit C)

Complainant alleges Respondent used his County-issued email, randal_andrews@bradfordcounty.com, on multiple occasions to discuss and arrange activity regarding his personal land sales. (ROI 2, 4) It is also alleged that he signed these emails using his official title and “contact block” information. (ROI 2)

Amanda Brown, Executive Assistant to the Bradford County Manager, advised that in accordance with the County’s 2013 through 2024 “Email, Internet, and Technology” policies and procedures, employees are permitted limited, personal use of the County email. (ROI 8, Exhibit D1-D4) She advised that the policy reflects,

The purpose of email is to facilitate inter-office and inter-agency transmittal of information. Email shall be used for matters of concern to County operations. Any incidental emails of personal, private, or non-business nature shall be kept to a minimum in both number and brevity.

(ROI 8, Exhibit D3)

In addition, a review of the "Use of Electronic Mail" section of the policy indicates, "The email system shall not be used to solicit or proselytize others for commercial ventures, religious or political causes, outside organizations, or other non-job-related solicitations." (ROI 10)

Respondent advised that he only used his County-issued email because it was convenient during work hours. (ROI 15) He advised that when he replies using his office email account, his official Bradford County position title and contact information are displayed. (ROI 15) Respondent advised that he does not believe his position with Bradford County made the buyer feel more compelled to purchase his property because of his County-issued email. (ROI 7, 14, Exhibit C)

County Attorney Richard Komando advised that he has reviewed the emails in question and the County policies. (ROI 17) He advised that the County's "Email, Internet, and Technology" policies and procedures permit the limited personal use of County email under Section b of the policy. (ROI 17, Exhibit D3) He opined Respondent's use of the email system were "incidental" and permitted under current County policy. (ROI 17)

Notwithstanding the County Attorney's opinion, it does appear that Respondent used his email to solicit others for commercial ventures in violation of the County's policy. If there was evidence that Respondent was noticed by the County Attorney that his use of the email system was permitted prior to his actions, then it may have negated the element of corrupt intent because he would have been acting on the advice of counsel; however, that evidence is not present. As such, there is sufficient evidence that Respondent's use of the email system was inconsistent with the proper performance of his duties.

Therefore, based on the evidence before the Commission, I recommend that the Commission find probable cause to believe that Respondent violated Section 112.313(6), Florida Statutes.

ALLEGATION TWO

Respondent is alleged to have violated Article II, Section 8(h)(2), Florida Constitution, by using his position to obtain a disproportionate benefit for himself.

APPLICABLE LAW

Article II, Section 8, provides as follows:

Ethics in government.—A public office is a public trust. The people shall have the right to secure and sustain that trust against abuse. To assure this right:

(h)(1) A code of ethics for all state employees and nonjudicial officers prohibiting conflict between public duty and private interests shall be prescribed by law.

(2) A public officer or public employee shall not abuse his or her public position in order to obtain a disproportionate benefit for himself or herself; his or her spouse, children, or employer; or for any business with which he or she contracts; in which he or she is an officer, a partner, a director, or a proprietor; or in which he or she owns an interest.

ANALYSIS

The underlying facts and circumstances relating to this allegation are contained above in Allegation One. See Analysis in Allegation One.¹

¹ In CEO 19-23, the Commission expounded on the intent requirement of the Constitutional amendment, noting that it is “highly similar, if not identical,” to the intent required to show a violation of Section 112.313(6) because both the rule and the amendment “require an act or omission committed with a ‘wrongful intent’ and for the purpose of obtaining a result ‘inconsistent with the proper performance’ of one’s public duties.”


Therefore, based on the evidence before the Commission, I recommend that the Commission find probable cause to believe that Respondent violated Article II, Section 8(h)(2), Florida Constitution.

RECOMMENDATION

It is my recommendation that:

1. There is probable cause to believe that Respondent violated Section 112.313(6), Florida Statutes, by using his position to secure a special benefit for himself.
2. There is probable cause to believe that Respondent violated Article II, Section 8(h)(2), Florida Constitution, by using his position to obtain a disproportionate benefit for himself.

Respectfully submitted this 17th day of December, 2025.


MELODY A. HADLEY
Advocate for the Florida Commission
on Ethics
Florida Bar No. 0636045
Office of the Attorney General
The Capitol, PL-01
Tallahassee, FL 32399-1050
(850) 414-3300, Ext. 3704