



**Florida Commission on Ethics**  
 P. O. Drawer 15709, Tallahassee, Florida 32317-5709  
 "A Public Office is a Public Trust"

FLORIDA  
 COMMISSION ON ETHICS

OCT 03 2022

RECEIVED

ORIGINAL

# COMPLAINT 22-163

### 1. PERSON BRINGING COMPLAINT:

Name: Dave Aronberg & Sherry Plymale Telephone Number: 772-485-9935  
 Address: 401 North Dixie Highway  
 City: West Palm Beach County: Palm Beach State: FL Zip Code: 33401

### 2. PERSON AGAINST WHOM COMPLAINT IS BROUGHT:

Use a separate complaint form for each person you wish to complain against:  
 Name: William Oppenheimer Telephone Number: \_\_\_\_\_  
 Address: 698 Mooring Line Drive  
 City: Naples County: Collier Zip Code: 34102  
 Title of office or position held or sought: Collier County Commission, District 4

### 3. STATEMENT OF FACTS:

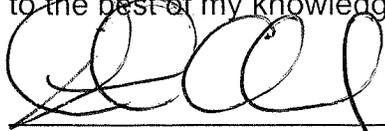
Please provide a full explanation of your complaint, describing the facts and the actions of the person named above and why you believe he or she violated the law. Include relevant dates and the names and addresses of persons whom you believe may be witnesses. Please do not submit more than 15 pages, including this form. Please do not submit video or audio tapes, CDs, DVDs, flash drives or other electronic media; such material will not be considered part of the complaint and will be returned.

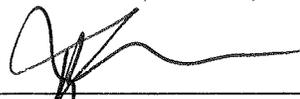
### 4. OATH

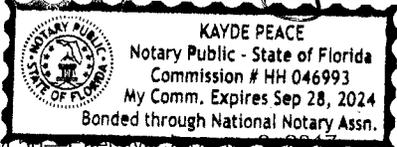
STATE OF Florida  
 COUNTY OF Palm Beach

I, the person bringing this complaint, do swear or affirm that the facts set forth in the foregoing complaint and attachments thereto are true and correct to the best of my knowledge and belief.

Sworn to (or affirmed) and subscribed before me by means of  physical presence or  online notarization, this 27<sup>th</sup> day of September, 2022, by David Aronberg (name of person making statement)

  
 \_\_\_\_\_  
 SIGNATURE OF COMPLAINANT

  
 \_\_\_\_\_  
 (Signature of Notary Public)  
Kayde Peace  
 \_\_\_\_\_  
 (Print, Type, or Stamp Commissioned Name of Notary Public)



Personally Known \_\_\_\_\_ OR Produced Identification   
 Type of Identification Produced: TL/PL

Write-in candidate William Oppenheimer filed an incorrect and incomplete Form 6 (Full and Public Disclosure of Financial Interests). The candidate's Form 6 violations include the following:

- Failure to identify street addresses of his real property listed under Part B. One item is listed as "Principal Residence" with no address. Another item is listed as "Real Estate CT" with no address.
- Failure to identify type of, or investment products within, intangible asset listed under Part B as "BlackRock Portfolio" valued at \$320,000.
- Vague reference to "Vehicles" as an individual asset under Part B, without any further description.
- Illegible entry for a significant asset (\$310,000) under Part B in his attachment.
- Illegible entry for a different asset (\$10,000) under Part B in his attachment.
- Missing significant assets under Part B. The candidate values his net worth under Part A as \$8,025,520, but his assets listed under Part B are nowhere near that figure (\$3,080,000), not even after subtracting his disclosed liabilities.
- Failure to include required information about multiple sources of income under Part D.
  - The candidate lists "BlackRock" but no other identifying information about this income.
  - The candidate lists "Rental Income" under Part D without any addresses of the rental property.
  - The candidate refers to income from "Investments" without any further information about the source of such income.
  - The candidate refers to income from "Pension" without any further information about the source of such income.

OF FINANCIAL INTERESTS

Please print or type your name, mailing address, agency name, and position below:

FOR OFFICE USE ONLY:

JUN 15 2022

LAST NAME -- FIRST NAME -- MIDDLE NAME:

Oppenheimer, William

MAILING ADDRESS:

698 Meering Lane Dr.

Naples 34102 Collier

CITY:

ZIP:

COUNTY:

NAME OF AGENCY:

NAME OF OFFICE OR POSITION HELD OR SOUGHT:

County Commission 9

CHECK IF THIS IS A FILING BY A CANDIDATE

PART A -- NET WORTH

Please enter the value of your net worth as of December 31, 2021 or a more current date. [Note: Net worth is not calculated by subtracting your reported liabilities from your reported assets, so please see the instructions on page 3.]

My net worth as of 6/8, 2022 was \$ 8,025,500

PART B -- ASSETS

HOUSEHOLD GOODS AND PERSONAL EFFECTS:

Household goods and personal effects may be reported in a lump sum if their aggregate value exceeds \$1,000. This category includes any of the following, if not held for investment purposes: jewelry; collections of stamps, guns, and numismatic items; art objects; household equipment and furnishings; clothing; other household items; and vehicles for personal use, whether owned or leased.

The aggregate value of my household goods and personal effects (described above) is \$ 100,000

ASSETS INDIVIDUALLY VALUED AT OVER \$1,000:

DESCRIPTION OF ASSET (specific description is required - see instructions p.4)

VALUE OF ASSET

DESCRIPTION OF ASSET (specific description is required - see instructions p.4)	VALUE OF ASSET
Primary Residence <sup>bedding</sup>	\$2,000,000
New Estate CT <sup>Portfolio</sup>	\$600,000
Vehicles	60,000
Furniture + Contents	100,000

PART C -- LIABILITIES

LIABILITIES IN EXCESS OF \$1,000 (See instructions on page 4):

NAME AND ADDRESS OF CREDITOR

AMOUNT OF LIABILITY

NAME AND ADDRESS OF CREDITOR	AMOUNT OF LIABILITY
Car Loan <sup>(Caledonia)</sup>	\$56,000
Credit Cards <sup>Mid-Florida CU</sup>	12,000

JOINT AND SEVERAL LIABILITIES NOT REPORTED ABOVE:

NAME AND ADDRESS OF CREDITOR

AMOUNT OF LIABILITY

NAME AND ADDRESS OF CREDITOR	AMOUNT OF LIABILITY

**PART D -- INCOME**

Identify each separate source and amount of income which exceeded \$1,000 during the year, including secondary sources of income. Or attach a complete copy of your 2021 federal income tax return, including all W2s, schedules, and attachments. Please redact any social security or account numbers before attaching your returns, as the law requires these documents be posted to the Commission's website.

I elect to file a copy of my 2021 federal income tax return and all W2's, schedules, and attachments.  
 (If you check this box and attach a copy of your 2020 tax return, you need not complete the remainder of Part D.)

PRIMARY SOURCES OF INCOME (See Instructions on page 5):

NAME OF SOURCE OF INCOME EXCEEDING \$1,000	ADDRESS OF SOURCE OF INCOME	AMOUNT
Investment Income		\$20,000 (18,000)
Social Security		12,800
Rental Income	80/457 Wood Park Trl	36,000

SECONDARY SOURCES OF INCOME [Major customers, clients, etc., of businesses owned by reporting person--see Instructions on page 5]:

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

**PART E -- INTERESTS IN SPECIFIED BUSINESSES [Instructions on page 6]**

	BUSINESS ENTITY # 1	BUSINESS ENTITY # 2	BUSINESS ENTITY # 3
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			

**PART F - TRAINING**

This section applies only to officers required to complete annual ethics training pursuant to section 112.3142, F.S. [See instructions p. 6]

I CERTIFY THAT I HAVE COMPLETED THE REQUIRED TRAINING.

**OATH**

I, the person whose name appears at the beginning of this form, do depose on oath or affirmation and say that the information disclosed on this form and any attachments hereto is true, accurate, and complete.

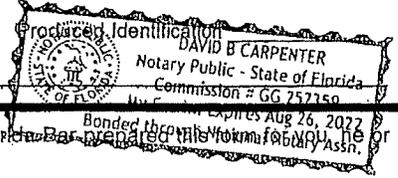
STATE OF FLORIDA  
 COUNTY OF Collier  
 Sworn to (or affirmed) and subscribed before me by means of 1  
 physical presence or  online notarization, this 15 day of

June 2022 by David B Carpenter  
 (Signature of Notary Public--State of Florida)

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

W. J. Green  
 SIGNATURE OF REPORTING OFFICIAL OR CANDIDATE

Personally Known X OR  
 Type of Identification Produced \_\_\_\_\_



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

I, \_\_\_\_\_, prepared the CE Form 6 in accordance with Art. II, Sec. 8, Florida Constitution, Section 112.3144, Florida Statutes, and the instructions to the form. Upon my reasonable knowledge and belief, the disclosure herein is true and correct.

Signature \_\_\_\_\_ Date \_\_\_\_\_

Preparation of this form by a CPA or attorney does not relieve the filer of the responsibility to sign the form under oath.

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

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Assets	
Princ. Residence	\$ 2,000,000
Retail Property	{ 300,000
	{ 300,000
Vehicles	60,000
Household Goods	100,000
Fidelity	310,000
RBC	10,000
<u>Liab</u>	
Car Loan	56,000
VISA	8,000
Amerx	500

Income	
Investments	20,000
Social Security	18,000
Rental Inc	36,000
Pension	22,000

Wagner