

Pursuant to Rule 3-7.1(f), Rules of Discipline, you must execute the appropriate disclosure paragraph below and return the form to this office by **September 7, 2017**. The rule provides that the nature of the charges be stated in the notice to your firm; however, we suggest that you attach a copy of the complaint.

CERTIFICATE OF DISCLOSURE

I HEREBY CERTIFY that on this _____ day of September, 2017, a true copy of the foregoing disclosure was furnished to _____, a member of my present law firm of _____, and, if different, to _____, a member of the law firm of _____, with which I was associated at the time of the act(s) giving rise to the complaint in The Florida Bar File No. 2018-10,118 (12B).

Ricinda Hope Perry

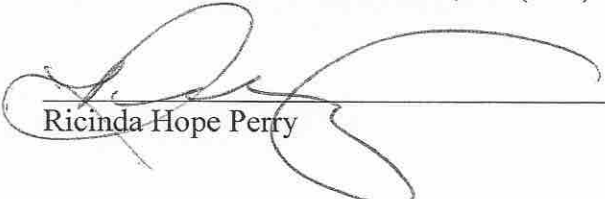
CERTIFICATE OF DISCLOSURE (Corporate/Government Employment)

I HEREBY CERTIFY that on this _____ day of _____, 201____, a true copy of the foregoing disclosure was furnished to _____, my supervisor at _____ (name of agency), with which I was associated at the time of the act(s) giving rise to the complaint in The Florida Bar File No. 2018-10,118 (12B).

Ricinda Hope Perry

CERTIFICATE OF NON-LAW FIRM AFFILIATION (Sole Practitioner)

I HEREBY CERTIFY to The Florida Bar on this 5th day of September, 2017, that I am not presently affiliated with a law firm and was not affiliated with a law firm at the time of the act(s) giving rise to the complaint in The Florida Bar File No. 2018-10,118 (12B).



Ricinda Hope Perry



Ricinda H. Perry, P.A.

Attorney at Law

September 4, 2017

VIA U.S. Mail

Mr. Richard Coombs,
Bar Counsel
Attorney Consumer Assistance Program
651 East Jefferson Street
Tallahassee, Florida 32399-2300

RE: John Metz, The Florida Bar File No. 2018-100,118 (12B)

Dear Mr. Coombs,

Attached is the required response to the above-referenced complaint pursuant to Rule 4-8.4(g), Rules of Professional Conduct of the Rules Regulating the Florida Bar.

Please feel free to contact me should you have any additional questions or concerns at (941)526-6468.

Kindest Regards,

Ricinda H. Perry

Enc.

Cc: John Metz (via U.S. Regular Mail)

Response to John Metz; The Florida Bar File No. 2018-10, 118(12B)

John Metz has presented one complaint to the Florida Bar Association. Below is the complaint and my response thereto.

This is a case of plagiarism by Ricinda Perry, City Attorney for Bradenton Beach, Florida.

I am a member of the Bradenton Beach Planning and Zoning Board. On June 30, 2017, I, and other members of said board, received an unsolicited email from Ms. Perry regarding the subject of "Quasi-Judicial Hearings".

After reading several paragraphs of said email, it was apparent from the tone, language, and manner that his [sic] was not Ms. Perry's style of writing. I did a short internet search and within minutes found the source of the material in THE FLORIDA PLANNING OFFICIALS HANDBOOK (hereinafter "FPOH") which can be found at http://desotobocc.com/imagesplanning_zoning/FLORIDA_PO_HANDBOOK.pdf.

In her email, Ms. Perry wrote the opening paragraph of five sentences, the last sentence reading "Below is an analysis on procedural due process as it relates to quasi-judicial land use decisions. "The inference and implication was that this was her "analysis."

The next 15 paragraphs are a virtual copy from the FPOH (the FPOH text follows below). Occasionally she changed a word such as "Council" to "Commission" since we have a Commission and not a Council here locally. She also changed some wording around the "Snyder decision" since the FPOH included a [sic] excerpt of that case and Ms. Perry did not.

Response:

It is difficult for me to formulate any formal response since the allegation of plagiarism is based upon my sharing of relevant portions of a public record for my client, a governmental entity, where said document was created with public funding and direct involvement of governmental agencies for public use by those who work on land use matters for the county and local governments, including planners, planning and zoning board members and commissioner/council members. In addition to providing relevant portions of the document to my client, I provided the entirety of it to the City Clerk for use by the City. In an effort to be more responsive in accordance with the Florida Bar Rules, please see the below detailed response.

I did not plagiarize, nor did I infer or imply that the research provided in an email was a document that I was trying to pass off as being my own literary work that I wished to publish under my own name. Per the quote from Mr. Metz, I stated in my research email that “the below information was an analysis” and not “the below email is my analysis”.

In order to respond to the complaint filed against me by Mr. Metz, I feel it is important for those considering the complaint to understand the current state of the City of Bradenton Beach, a client that I represent as the City Attorney.

Facts Leading up to the Legal Advice at Issue:

The City of Bradenton Beach is a small island community with a population of approximately 1,200 people. The City Commission has created and appointed a Planning and Zoning Board to hear land use matters. Mr. Metz has stated in The Florida Bar Inquiry/Complaint Form that he is a Planning and Zoning Board member. John Metz, together with Reed Mapes, Patricia Shay, and William Vincent all served on the Planning and Zoning Board (hereinafter, “PZ”) and all resigned in August, 2017 following the initiation of a lawsuit against them individually for violations of the Florida Sunshine Law, as codified in Chapter 286, Fla. Stat.

On or about June 21, 2017, the Planning and Zoning Board conducted a hearing on a land use matter (hereinafter, “PZ Proceeding”). The PZ Proceeding was continued after extensive PZ questions, demands for the landowner to provide contributions in exchange for an approval, and requests for additional documentation and information. I was contacted later that day by the law firm representing the applicant and Vice Mayor John Chappie. Vice Mayor Chappie advised me that he was concerned that the proceeding did not comport with the rules of a quasi-judicial proceeding, as he understood them to be, and in the Mayor’s absence, directed my office to prepare some legal guidance for the City and to work with the applicant and City staff to rectify any legal problems resulting from the PZ Proceeding. During my phone call with the applicant’s representatives, I was advised that the inquiries and statements made by Planning and Zoning Board members were improper, unlawful and that the board failed to adhere to the requirements of a quasi-judicial proceeding. On June 26, 2017, I was further provided an email from the applicant’s representatives stating:

“While I have highlighted specific comments or questions, we certainly leave it to your discretion to determine which of those you believe may fall outside the bounds of proper questions in a quasi-judicial proceeding.”

Attached to the email were three pages of legal issues stemming from the proceeding. See Exhibit A, attached hereto and incorporated herein.

As part of my due diligence to identify what, if any error had occurred and appropriate remedies, I conferred with City staff, reviewed documentation germane to the PZ Proceeding, listened to the recording of the PZ Proceeding, and reviewed Florida Attorney General Opinions, Florida case law, a number of Stetson Law Review Articles, numerous articles from the Florida Municipal Attorney Association Annual Seminar Materials, CLE International Seminar Materials, National Business Institute Seminar Materials and the Florida Planning Officials Handbook (which, notably, is disseminated as a public document, available to the public from a number of public agencies, including the Desoto Board of County Commissions, which Mr. Metz referenced in his complaint).

During this timeframe, I learned that Mr. Metz started a personal investigation, including the filing of multiple public records requests, specific to the pending land use matter that he was presiding over in the PZ Proceeding.

Following my review of the actions of the PZ Board and legal research, I determined that the concerns raised by the Vice Mayor and legal counsel for the applicant were valid, finding clear violations of established Florida law by the Planning and Zoning Board, and specifically, John Metz through his independent investigation. Furthermore, the PZ Board did not afford the applicant due process by treating the proceeding as legislative and wholly ignoring the rules of fair play in quasi-judicial hearings.

Consequently, after conferring with the attorneys and planner for the applicant, we established a tentative plan to cure the actions of the Planning and Zoning Board, which began with me advising the City how to conduct quasi-judicial hearings. On August 1, 2017, following my email to the City clarifying quasi-judicial hearings from legislative hearings, I met with the applicant's attorneys and planner, where we continued to work toward rectifying the errors made at the PZ Proceeding, *i.e.* legal notices, sworn testimony, and documentation requirements.

Attached to Mr. Metz' bar complaint via the Appendix is an email sent by me on June 29, 2017. This was an email, which I sent to Mayor Shearon and the City Commission, providing a summary of my training, practice experiences and knowledge, as well as recent legal research on quasi-judicial hearings and legislative hearings. I arrived at the same conclusions of those articulated in numerous case law opinions, Florida Attorney General opinions, the municipal lawyer seminar materials and the Florida Planning Officials Handbook. Having determined that the public document, the Florida Planning Officials Handbook, was the most readable and understandable summary of Florida law for conducting land use hearings, I provided a quick email with an opening summary of the

situation and gave the City portions of the public handbook as guidance for their planning practices.

Details/Argument Specific to Plagiarism Claim

As is the general practice of lawyers, I provided my findings to the City in the more informal format of an email and provided changes that would make the legal research more relatable to my client. Cognizant of the fact that my time is at a cost to taxpayers, I chose to use a section from the Handbook in my email rather than rewrite and reword all of the research at a greater legal cost. All of the Handbook information that I used was arrived at independently, and is general knowledge of any practicing land use, environmental, governmental attorney, planner, engineer, and most municipal land use board members. In no way did I take credit for anyone else's work, nor did I attempt to publish said email. The email communication was provided as a cost-effective means of resolving a significant legal issue regarding a property owner's rights and was merely offered to assist Mr. Metz, together with the other City board members while discharging their planning duties and to clarify the law as it relates to quasi-judicial proceedings.

Furthermore, I never hid the fact that I used the Handbook, which is a free public government document. It is not unusual for me to bring my handbooks and seminar materials into Commission meetings and read excerpts from them to my client. Almost every seminar I have attended, we are advised to take the materials and use them to help our municipal clients. Most of the materials even include examples of ordinances and policies we have been told to use and modify for our clients. One of the attorneys who assisted in the creation of the Handbook at issue had spoken on these same topics at past seminars I attended. Specific to this instance, I referenced the Handbook in billing to the City, provided a copy of the Handbook to the City Clerk, and even recommended that board members be required to review the Handbook. On a regular basis, City staff references excerpts from handbooks and manuals. This communication was part of the ordinary business of the City.

First Plagiarism Complaint and Additional background information that appears to be the basis for Mr. Metz' complaint.

Nearly concurrent with this, these same Planning and Zoning Board members engaged in behavior that is in violation of the Florida Sunshine Law set forth in Chapter 286, Florida Statutes. Multiple individuals advised me that Mr. Mapes, Mr. Metz, Ms. Shay, and Mr. Vincent were holding meetings at locations throughout the City that had not been sanctioned by the City of Bradenton Beach. These meetings were prearranged by the Planning and Zoning Board members, which was chaired by Planning and Zoning Board member William Vincent. Those in attendance at the meetings called themselves Concerned Neighbors of

Bradenton Beach (hereinafter, "CNOBB") and topics of discussion were issues that they knew, or should have known, would come before them as Planning and Zoning Board matters. I prepared a second email communication dated July 27, 2017, to my client regarding the improper actions of the Planning and Zoning Board members. Please see Exhibit B, attached hereto and incorporated herein.

Immediately following this second warning from my office, on next day, July 28, 2017, Mr. Metz lodged a fifteen-page complaint nearly identical to his bar complaint, with the City. See, Exhibit C, which is the cover email articulating his arguments, attached hereto and incorporated herein. (Due to the page limitations of this submittal, I have redacted from the Exhibit C the Handbook with handwritten notations, which Mr. Metz resubmitted in his bar complaint.) While in attendance at the 2017 Florida Municipal Attorneys Association Seminar, I immediately responded to Mr. Metz' complaint of plagiarism. Please see Exhibit D, attached hereto and incorporated herein. The City Commission did not take any action on the matter.

The City was notified on August 2, 2017 that a lawsuit was about to be filed against Mr. Metz individually, along with the other Planning and Zoning Board members of CNOBB for alleged Sunshine Violations. An opportunity to join the lawsuit was presented by the complainant since the City was unaware and did not in any way sanction the actions of the Planning and Zoning Board/CNOBB members. The City Commission voted in a public meeting on August 3, 2017 to join the Sunshine Law complainant in the filing of a three-count complaint alleging Sunshine Law violations against the four members of the Planning & Zoning Board (Reed Mapes, John Metz, Patricia Shay and William Vincent) along with two members of the Scenic Waves Partnership Committee. The factual basis for the Sunshine Law violations are that four Planning and Zoning Board members and two SWPC members met on one or more occasions for the purpose of discussing matters reasonably foreseeable to come before the P&Z Board. The claims seek declaratory and injunctive relief and significantly, personal liability for attorney's fees and costs against the individual board members.

Since he moved to Bradenton Beach in 2014, Mr. Metz has demonstrated a history and pattern of behavior that he legally and publically attacks anyone who questions his conduct or interferes with his plans. For example, the City and an adjacent property owner are currently defending a lawsuit brought by Mr. Metz because the owner had purchased property adjacent to Mr. Metz, which Mr. Metz was interested in purchasing. The City has repeatedly explained the errors with his interpretation of the law, and recently the landowner and City prevailed in a Special Master Hearing that Mr. Metz initiated to undo the administrative approvals and building permits issued to the landowner. He has now filed

civil action in court to appeal the multi-day hearing with the special master¹. Another example of his retaliatory behavior occurred when Commissioner Cole openly stated in a public meeting that as an elected official he opposed the reappointment of a Planning and Zoning Board member (Metz) who sues the City. Since making this statement, Commissioner Cole has been made the subject of repeated Florida Department of Environmental Protection and City of Bradenton Beach Code Enforcement Complaints initiated by Mr. Metz. Mr. Metz dissatisfied that the DEP and Code Enforcement have dismissed all complaints, has attempted to try his code enforcement claims before the City Commission and has stated in a public meeting this past month that he may take additional action on the matter and regularly appears at Commissioner Cole's business site with a camera detailing the actions of Commissioner Cole, his family and his patrons. To date the City has defended, or is defending, four civil circuit lawsuits filed by Mr. Metz. In accordance with this pattern of behavior, and immediately following the filing of the Sunshine lawsuit against Mr. Metz, he has engaged in multiple personal attacks against both the City and me, and has escalated his "plagiarism complaint" from the City Commission to the Florida Bar. Please see Composite Exhibit E, attached hereto and incorporated herein.

Legal Citations

Mr. Metz has cited to an Illinois case, *In re Lamberis*, 443 N.W. 2d 549 (1982) and two referee judgments, *The Florida Bar v. Rafael Gonzalez*, Nos. SC 07-2314 and SC 08-434, as his legal authority for disciplinary action for my email.

The Illinois case dealt with an individual who was preparing a thesis and plagiarized portions of his thesis. An email to a client is nowhere akin to the facts in *Lamberis*. Moreover, the Illinois case is of no legal precedent in the State of Florida. A practicing and licensed Florida attorney should not be subject to discipline based on out-of state bar rules and resulting discipline under same.

The Gonzalez disciplinary hearing(s) were based on different facts than those under consideration in this complaint process.

First, Mr. Gonzalez was seeking to publish an article in which he copied text from previously-published articles that had not been authored by him, and of which he did not obtain permission to publish said work as his work. Secondly Mr. Gonzalez was not providing legal advice to a client from his to-be-published article. Mr. Gonzalez was presumably attempting to gain notoriety throughout the legal community and to potentially acquire clients through demonstrating superior legal knowledge on a topic that he was

¹ *Metz v. Steve Gilbert*, 2017 CA 3066 (Fla. Cir. Ct. 2017) (petition for writ of certiorari)

looking to publish. Here, I was using governmental public documents to assist a governmental client in discharging its duties in accordance with Florida law. In no way was I seeking any notoriety from the email communication to my client, nor was I preparing a formal legal memorandum of points and authorities that I would file in a legal proceeding or more formal venue.

Another distinguishable point from Gonzalez's actions was a specific finding that the work that Mr. Gonzalez was seeking to publish was not his own work. Unlike Gonzalez, my email was generated on independent knowledge gained from my experience as a land use and government attorney, a review of Florida cases, opinions, continuing legal education and a free public document available from a governmental entity for use by others working in a governmental entity. I had previously, and on a number of occasions, advised my client concerning the differences of a quasi-judicial proceeding and a legislative proceeding, offering the same advice set forth in my email during other public meetings. I have shared this same information with staff members in preparing for public hearings. The City of Bradenton Beach has been one of my clients for nearly fourteen years and I am well versed on the generalized information set forth in the Handbook. Having come to the same independent conclusion from my professional experience and legal research, use of the public document was not plagiarism.

Finally, there is no indication in the Gonzalez opinions that Mr. Gonzalez made any references or acknowledgement of the use of the other published articles while preparing his published article. While I would use the Blue Book Uniform System of Citations in my legal briefs and in legal memorandums submitted in a judicial venue, this was not necessary in an informal email communication and such a practice would become extremely cost-prohibitive to taxpayers. Furthermore, I made references to the materials in billing and had provided the Handbook to the City Clerk.

Conclusion

Based on the legal authority presented by Mr. Metz and Rule 4-8.4(c) of the Florida Bar Rules, in no way were my actions of providing advice and materials to my client dishonest or an act of plagiarism. At all times, I was trying to protect the City, including Mr. Metz, from legal actions stemming from his actions and those of his colleagues' actions when they were serving as Planning and Zoning Board members.



From: **Darenda Marvin** dmarvin@grimesgoebel.com
Subject: June 21, 2017 P and Z
Date: June 26, 2017 at 6:24 PM
To: ricinda@verizon.net
Cc: Sacha Ross sross@grimesgoebel.com, Caleb Grimes cgrimes@grimesgoebel.com

Ricinda, as requested, I have listened to the recording of the P and Z meeting and attached are my notes. While I have highlighted specific comments or questions, we certainly leave it to your discretion to determine which of those you believe may fall outside the bounds of proper questions in a quasi-judicial proceeding. Should you have an opportunity to listen to the hearing, there may perhaps be other comments or questions that could be categorized as such.

We would be happy to discuss with you further should you wish.

Darenda D. Marvin, AICP
Senior Planner

Grimes Goebel Grimes Hawkins
Gladfelter & Galvano, P.L.
1023 Manatee Avenue West
Bradenton, Florida 34205
941-748-0151 (t) 941-748-0158 (f)
Direct Dial: 941-782-2048
www.grimesgoebel.com

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notes from
PZ.docx

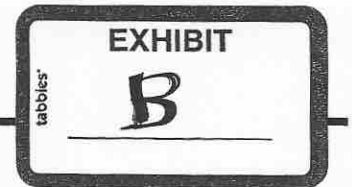
- If there is one accident and what it would cost the then it is worth some of the things they are asking for
- 90% of people don't think it is a street
- Just think how much nicer he can make our city look
- Requires no parking because it is open air dining-that is the way the code is written-a city commission decision -prior disagreement by P and Z
- Want to hear about unity of title
- If we say how many parking spaces we have we should only say how many "legal" spaces
- Concern with total seat count including the restaurant on the west side of the road
- Concern with restroom count to seating capacity in the restaurant on the west side of the road
- Seating capacity listed for entire operation on business tax receipt has to be addressed
- Question to Fire Department- does the number include the deck area at the restaurant on the west side of the road -what is covered in the 164 persons?
- Major congestion within the area with servers, employees, patrons waiting for tables
- Traffic flow, sidewalk and people walking in road is problem
- What are the mitigation efforts being made?
- City attorney needs to address question of unity of title-does this mean it is part of Bridge Street to allow open air dining
- Is the increase in restaurant capacity going to require more off site loading time or space?
- There is another business on the property (parasail)-are they owned by the same ownership or same umbrella company?
- Does parasail have a business tax receipt?
- Does the boat (used as office for parasail) have sanitary facilities on board?
- What written agreement is in place if the parasail operation is sharing facilities with the Bridge Tender?
- Upgrade and make it something our city can be proud of because right now it's not
- Work with city and push restaurant to west side of street and only use east side for waiting or parking

- No sidewalks
- Any ideas how to remedy congestion on roadway
- Walk by every day and have to jump out of road from drivers
- How many seats are in the restaurant on the west side of the road?
- What is in the upstairs area of the building on the west side of the road?
- How many bathrooms are there in the restaurant on the west side of the road?
- How many toilets and urinals are there in the restaurant on the west side of the road?
- How many employees?
- Are any bathrooms handicapped accessible in the restaurant on the west side of the road?
- Are they wheelchair accessible?
- Have a problem with number of seats overall (both east and west of Bay Street)
- Clients don't pull in all the way to the spaces on the road and they back out into the road
- It is just way too many people for this area
- Has to be some negotiation here if you want to get through this-parking, bathroom repair, facility upgrades and I want a sidewalk which means it will affect your parking
- Need a proper major development plan and to scale site plan
- This is first shot at identifying issues that need to be addressed so we have hard numbers and terms to know what we have and give you an opportunity to mitigate concerns -that is what process is about
- Why does business tax receipt have 103-operating outside the city's limits-they use this information to evaluate the site plan and we have far more than that (member even listed the number of employees in his count) we need to rectify these numbers
- What does our DBPR license capacity show
- What is fire department approval for capacity inside the restaurant
- Request is to increase so we typically bring sanitary facilities into compliance
- I like the Bridge Tender -paramount for the city to push businesses to upgrade our city
- Fix parking lot, the house, there is no landscaping, haphazard parking
- BTI is a major part of bridge street would like to see us -if we give you what you are asking for then its only right if we get a little bit back in the way of an upgrade and that won't hurt owner one penny

6.21.17 Bradenton Beach Planning and Zoning Commission

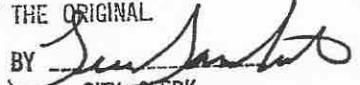
1. Comp Plan Amendment from PSP to MXD
2. Major Development Plan for outdoor dining located east of Bay Street
 - What is the location of tv's, the number of tv's , and how are they wired?
 - Where is parasail (YOLO) operating now?
 - What is relationship between parasail operator and BTI?
 - If selling t shirts and photos with the parasail then it is retail sales.
 - If operating as retail it will require sanitary facilities if no authorization from "supervising agency" (which is the city) to use some other facilities (for example at BTI)
 - Do you have an approved site plan in Cortez on file with Manatee County for the parasail operation?
 - Does the building in Cortez have bathrooms?
 - Is there a written agreement with YOLO and BTI for patrons to use BTI bathrooms?
 - Is electrical supply originating at BTI? Is there underground wiring?
 - Want clarification on how the site "abuts" Bridge Street.
 - As a matter of "physical" location it does not abut
 - Does he own any land to the south?
 - Is any effort being made in this comp plan change to change the use-concerned with future ability to construct condos
 - Don't know why we are seeking more (i.e. Mixed Use Bridge Commercial) unless we want to do more.
 - Concerned about future building on the Bay as it is not the vision for the City
 - Asked if Public Safety is most important Planning function
 - Servers routinely cross roadway not in the cross walk, no traffic control
 - East Bay Drive is only north and south artery and City suffers from over- abundance of cars
 - Patrons who have been drinking and wait staff in a hurry crossing road
 - People walk down the road like they are walking on the beach
 - Have to take care of in some way (using crosswalk or put the bar on the other side of road and only use this area as parking)

Terri Sanclemente (City Clerk)



From: Ricinda Perry <ricinda@verizon.net>
Sent: Thursday, July 27, 2017 1:09 PM
To: Mayor William Shearon
Cc: Terri Sanclemente (City Clerk); Commissioner Jake Spooner; Commissioner Marilyn Maro; Commissioner Ralph Cole; Commissioner John Chappie
Subject: URGENT: Request for Mayor and Commission Action
Importance: High

THIS IS TO CERTIFY THE ABOVE
IS AN EXACT AND TRUE COPY
OF THE ORIGINAL

BY 
CITY CLERK

Mayor,

PLEASE NOTE THAT I HAVE COPIED THE ELECTED OFFICIALS ON THIS EMAIL SO THAT THEY ARE ALSO MADE AWARE OF A POTENTIAL LEGAL THREAT.

I am writing to you out of what I believe to be my fiduciary responsibility to advise of actions taken by sitting board members at organized meetings held outside of City Hall, with no notice, and where votes are taken on subject matters that are planning and zoning issues. Further, the board members are not only attending, but actively organizing, participating and debating land use issues that the Planning and Zoning/LPA members have previously presided over, will preside over, and of which they have, or will foreseeably offer recommendations.

For example, you had made a public presentation regarding a joint project with Manatee County that included improvements to the Pier and the construction of a parking garage near Highland Ave. Parking problems have been addressed in the CRA Plan and a project to consider parking garages was part of the former CRA Plan and were carried over to the current plan. The parking garage was reviewed by the PZ/LPA in April and May of this year when they discharged their statutory requirement to review the CRA plan for compliance with the Comprehensive Plan. The parking garage was specifically referenced in the recommendation that came out of the PZ/LPA 2-meeting review. Building further on this is the current discussion of added parking to the Highland area. The PZ may foreseeably be reviewing the Comprehensive Plan, Land Development Code and the CRA plan to discuss parking garages. It has also been rumored that a private citizen/business man in the Highland Ave. area may be seeking the development of a parking garage. Consideration of a policy on parking garages in the unauthorized, unnoticed, and PZ-member driven CNOBB meetings to discuss policies regarding parking garages appears to be just one example of a possible Sunshine Violation that warrants review and an investigation directed by you and the City Commission. I would strongly encourage you to review the CNOBB website and listen to some of the meeting discussions, which sound akin to a Planning and Zoning Board workshop.

While I have not been present at any of these meetings, I was copied on a recent communication from CNOBB members, wherein I advised them to be mindful of the Sunshine Law and to take measures to discharge their legal obligations in a way that is in compliance with Florida Statute 286. It appears that my advise was disregarded.

Pursuant to the City Charter, the Mayor has primary responsibility for insuring the City operates in accordance with the policy mandates of the Commission. The City Commission has clearly mandated that Chapter 286 be upheld by those holding positions on a board or committee. The Sunshine Law is a very litigious matter for governmental entities. Despite requiring classes and oaths of taking Sunshine Law classes as well as written warnings, the Planning and Zoning Board members continue to advance land use policies in meetings they

schedule outside of City Hall in what they call CNOBB meetings. I would strongly advise that you place this urgent and extremely important issue on a City Commission agenda for discussion and direction to take action to determine if the four members of the Planning and Zoning Board are exposing the City to litigation and threatening the integrity of their work product on Land Use regulations and applications.

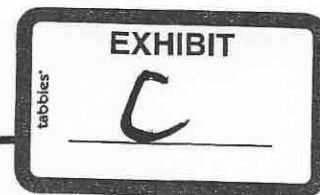
Thank you to your attention to this very important matter.

Ricinda H. Perry, Esq.
Telephone: (941)526-6468
Facsimile: (941)209-5302
Email: ricinda@verizon.net



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Terri Sanclemente (City Clerk)



From: John Metz <metz1419@gmail.com>
Sent: Friday, July 28, 2017 5:21 PM
To: Ricinda Perry
Cc: Commissioner Jake Spooner; Commissioner Marilyn Maro; Commissioner Ralph Cole; Commissioner John Chappie; Mayor William Shearon; Terri Sanclemente (City Clerk); Alan Garrett; Steve Gilbert; John Burns; James J. Lynch; Patty Shay; Reed Mapes; Bill Vincent
Subject: Your email entitled " Quasi-Judicial Decision-making, dated June 29, 2017
Attachments: Fl. Planning Officials Handbook.pdf; Perry email June 29 2017.pdf

NO P & Z MEMBER SHALL CONTACT/COMMUNICATE WITH ME ON THE SUBJECTS BELOW EXCEPT DURING A P & Z MEETING

Dear Ms. Perry,

I have four issues with the above email:

THIS IS TO CERTIFY THE ABOVE
IS AN EXACT AND TRUE COPY
OF THE ORIGINAL

BY 
CITY CLERK

ISSUE 1: Plagiarism

Soon after beginning to read your email, I realized it was very generic and not in your tone or manner. I suspected it was lifted from somewhere and within very few minutes, I found the source, THE FLORIDA PLANNING OFFICIALS HANDBOOK (hereinafter "handbook") which can be found at http://desotobocc.com/images/planning_zoning/FLORIDA_PO_HANDBOOK.pdf.

The pertinent parts you copied begin in Chapter II, pages 28 through 34. I am attaching those pages to this email.

I am also attaching my mark-up pages of your email. Other than the introductory paragraph and the closing paragraph, the remaining approximately 15 paragraphs were taken from this reference without any citation nor quotation or other marks indicating it was not your original material. You did add approximately 4 sentences (IN YELLOW MARKER) and made a few minor substitutions (IN YELLOW MARKER) such as you substituted "The building and planning department of our City" for the handbook's "Many communities"; you substituted "Commission" for the handbook's "Council"; and you substituted "governmental" for the handbook's "collegial".

My favorite part of your copying was the handbook's use of "ad-here" where the word was hyphenated to fit within the margins. When you copied it, it was in the middle of the sentence but you still hyphenated it!

Such an extensive use of plagiarism is unprofessional, unethical and lacks integrity.

ISSUE 2: The City's P & Z Board is advisory and not quasi-judicial.

The City's P & Z Board makes recommendations only to the Commission. P and Z does not make a decision.

I would direct you to Attorney General Opinion 92-48 which states in part:

“While the regional planning agency advises the local government...,such any agency lacks decision-making authority which determines the rights or interests of a party. Accordingly, it does not appear that the proceedings...are quasi-judicial proceedings”

ISSUE 3: Ex parte communications in non-quasi-judicial hearing are *not subject to restrictions of the Jennings v. Dade County (1991) 589 So. 2d 1337*

Please see AGO 92-48

“It does not appear that the South Florida Regional Planning Council’s decision whether to appeal a local government’s development order involves a quasi-judicial proceeding subject to the restrictions on ex parte communications stated in the *Jennings* case”.

ISSUE 4: General allegations of undocumented and investigated ex parte communications besmirching six board members sent to Commissioners and City staff.

Disheartening. I can uncategorically state that I did not have any ex parte communications with the applicant nor his team.

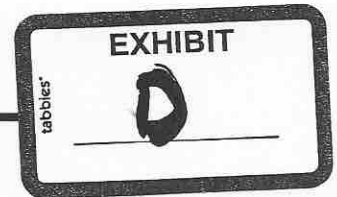
It would seem that the City would support its board members against undocumented or investigated charges.

Sincerely,

John Metz

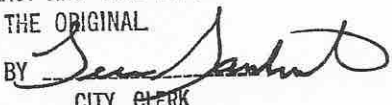
NO P & Z MEMBER SHALL CONTACT/COMMUNICATE WITH ME ON THE SUBJECTS BELOW
EXCEPT DURING A P & Z MEETING

Terri Sanclemente (City Clerk)



From: Ricinda Perry <ricinda@verizon.net>
Sent: Friday, July 28, 2017 6:26 PM
To: John Metz
Cc: Commissioner Jake Spooner; Commissioner Marilyn Maro; Commissioner Ralph Cole; Commissioner John Chappie; Mayor William Shearon; Terri Sanclemente (City Clerk); Alan Garrett; Steve Gilbert
Subject: Re: Your email entitled " Quasi-Judicial Decision - THIS IS TO BE USED BY THE BOARD 7

IS AN EXACT AND TRUE COPY
OF THE ORIGINAL

BY 
CITY CLERK

Mr. Metz,

IT IS IMPERATIVE THAT YOU PLEASE STOP SENDING EMAIL COMMUNICATIONS TO YOUR FELLOW BOARD MEMBERS. THIS OPENS THE CITY UP TO LIABILITY. When I hit reply all to your email - the planning and zoning board was listed. From the statements made in your email, you are attempting to disparage me, but you are also communicating with fellow board members on a matter that is pending in front of the Planning and Zoning Board, where issues include the type of proceeding and whether any *ex parte* communications have taken place are at issue.

Also, it appears that you do not understand some planning practices in the State of Florida. The South Florida Regional Planning Council is not remotely the same type of governmental body as a Planning and Zoning Board of a local government who has been delegated powers by the City Commission. The AG Opinion you referenced is not on point and, furthermore, AG Opinions are nothing but persuasive authority in the State of Florida. Actual statutes and Florida Court opinions are binding authority.

I relied upon actual case law and not Florida Attorney General Opinions in advising the City that the matter at hand is quasi-judicial. Likewise counsel who represents the party appearing before the PZ also recognizes the matter as being quasi-judicial. There are *ex parte* restraints on board members when hearing quasi-judicial matters.

As to your plagiarism complaint, I have attended hundreds of online, recorded and in-person Florida law seminars/courses, and right now am attending the same Florida Municipal Attorneys Association 3 days seminar that I have attended countless times. The information in the Handbook is from Susan Trevarthen, who is an attorney I became acquainted with when I worked at Lewis, Longman and Walker through Chip Rice. I have personally paid for and attended her presentations at City, County and Local Government Seminars as well as the Florida Municipal Attorneys Association Seminars for the Florida Bar. The information in said document is also a public record from the Desoto BOCC that I was provided and has information used from other courses taught by Ms. Trevarthen. We were advised that this information was to be freely used by Florida practicing attorneys, planners, and government staff. None of the ideas or information was new, original, and there is no copyright requirements on any of my literature that I have paid for, referenced and used. I did give "credit" or "reference" the document in my City work on this matter. I could certainly have re-written the entirety of the email; however, I chose to use a more cost-effective approach by copying relevant portions of public information and public records.

Regardless, of your opinion as to "plagiarism" when I share helpful legal information to our boards, I think it may be helpful for the City to require all Planning and Zoning Board members to read the entirety of the Florida Planning Officials Training Program. There is a substantial wealth of information in the document that far exceeds the limited portion I provided. It has become clear that there are areas where board members in the City are unclear on their legal obligations, requirements and Florida law.

Getting back to the reason for my prior communication with the City - I have a fiduciary responsibility to make sure that laws are not being broken and that the City is not vulnerable to litigation. The issues I presented to the City were raised by two attorneys and an elected official. This certainly warranted sharing some education that I have picked up while both speaking at, and taking continuing legal education around the State of Florida.

Have a nice weekend and thank you for your work.

Ricinda H. Perry, Esq.
Telephone: (941)526-6468
Facsimile: (941)209-5302
Email: ricinda@verizon.net



CONFIDENTIALITY NOTICE: This e-mail and any attachments are for the exclusive and confidential use of the intended recipient. If you are not the intended recipient, please do not read, distribute or take action in reliance upon this message. If you have received this in error, please notify us immediately by return e-mail and promptly delete this message and its attachments from your computer system. We do not waive attorney-client or work product privilege by the transmission of this message.

On Jul 28, 2017, at 5:21 PM, John Metz <metz1419@gmail.com> wrote:

NO P & Z MEMBER SHALL CONTACT/COMMUNICATE WITH ME ON THE SUBJECTS
BELOW EXCEPT DURING A P & Z MEETING

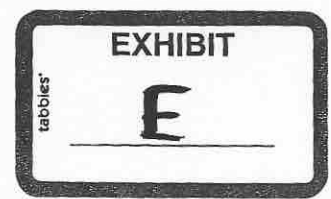
Dear Ms. Perry,

I have four issues with the above email:

ISSUE 1: Plagiarism

Soon after beginning to read your email, I realized it was very generic and not in your tone or manner. I suspected it was lifted from somewhere and within very few minutes, I found the source, THE FLORIDA PLANNING OFFICIALS HANDBOOK (hereinafter "handbook") which can be found at http://desotobocc.com/images/planning_zoning/FLORIDA_PO_HANDBOOK.pdf.

The pertinent parts you copied begin in Chapter II, pages 28 through 34. I am attaching those pages to this email.



Sunshine Lawsuit Filed, Anna Maria Island Sun, Aug. 16, 2017, at 1,15.

Charter Amendment E-mails Revealed, Anna Maria Island Sun, Aug. 16, 2017, at 1,31.

ANNA MARIA ISLAND

SUN

Sunshine lawsuit filed

The lawsuit alleges Sunshine violations occurred during recent CNOBB meetings.

BY JOE HENDRICKS

SUN CORRESPONDENT | jhendricks@amsun.com

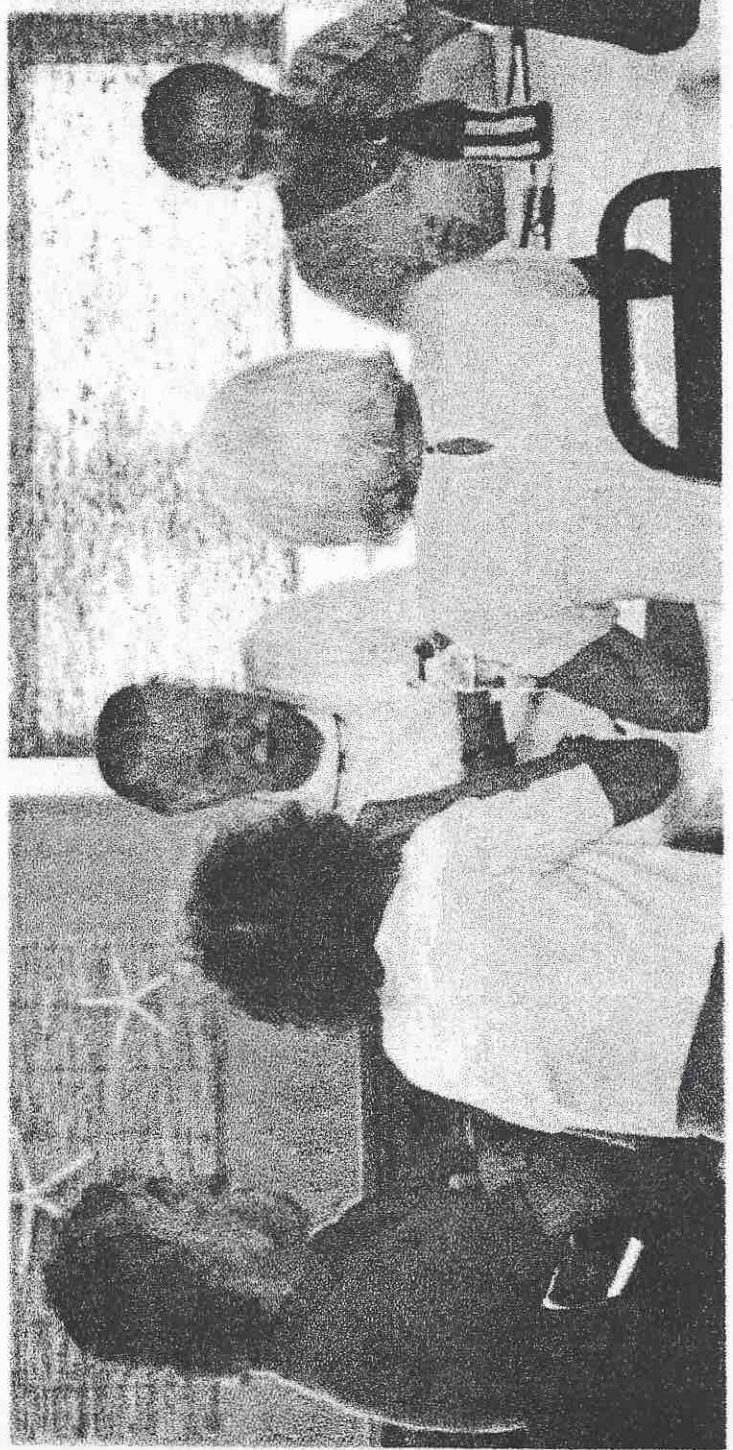
BRADENTON BEACH - Six current and former city board and committee members are named as defendants in a Sunshine Law lawsuit filed Friday.

"This is an action of the Government-in-the-Sunshine Law against the defen-

dants seeking declaratory and injunctive relief for holding meetings outside the Sunshine Law and contrary to the express written directive of the city attorney," the lawsuit complaint states.

Bradenton Beach Planning and Zoning Board member John Metz and former board members Reed Mapes, Patty Shay and Bill Vincent are named as defendants. Vincent, Shay and Mapes resigned from the planning board after

SEE LAWSUIT, PAGE 15



LAWSUIT: Filed Friday

FROM PAGE 1

the alleged Sunshine violations were discussed at the Aug. 3 City Commission meeting.

Scenic WAVES Committee chair Tjet Martin and committee member Rose Vincent (Bill Vincent's wife) are also named as defendants. All six defendants are affiliated with the non-city-sanctioned Concerned Neighbors of Bradenton Beach (CNOBB) group.

The city of Bradenton Beach and former Mayor Jack Clarke are named as co-plaintiffs and will be jointly represented by Sarasota attorney Robert Watrous. Parasota attorney Robert Watrous. Parasota legal Michael Barfield will provide legal assistance. The case is assigned to Judge Lon Arend.

The lawsuit seeks rulings on whether Sunshine violations occurred and what corrective actions can be taken.

"Plaintiffs are entitled to an award of attorney fees and costs for prosecuting this action," the complaint states.

CNOBB DISCUSSIONS

The complaint cites a July 25 CNOBB meeting where Mapes, Metz, Shay, Bill Vincent, Martin and others discussed prohibiting parking garages.

"The Sunshine Law requires advance notice to the public and an opportunity for public comment at any meeting or discussion on issues that are reasonably foreseeable

able to come before any board or collegial body," the complaint states.

CNOBB agendas are posted at the group's website, but residents and business owners were not given formal city notice about a parking garage discussion.

The planning board participated in Sunshine-compliant parking garage discussions when reviewing the updated Community Redevelopment Agency (CRA) plan in April.

"Because the P&Z board acts as the local planning agency, it is reasonably foreseeable that its duties will include future consideration of whether a parking garage should be constructed within the city. Only after engaging in substantive discussion did the defendants recognize that they should not discuss the matter any further because of the Sunshine Law," the complaint says.

The complaint mentions an Aug. 3, CNOBB meeting discussion on the proposed CRA district master plan and says Martin and Rose Vincent knew or should have known that issues discussed at a CNOBB meeting could foreseeably come before Scenic WAVES.

"It will come before Scenic WAVES," Martin said during the meeting.

Rose Vincent did not participate in the master plan discussion, but she was present during part of the meeting.

Only after engaging in substantive discussion, did the defendants recognize that they should not discuss the matter any further because of the Sunshine Law."

Attorney Robert Watrous Sunshine lawsuit

Barfield requested e-mails, text messages and social media communications exchanged by any of the four planning board members from June 1 to Aug. 8. He made a similar request to Martin.

On Friday, Barfield sent the city clerk and city attorney a 793-page document containing Mapes' e-mails and attachments, some of which predate CNOBB's first public meeting on July 11.

On June 12, Mapes e-mailed Bill Vincent about Metz joining CNOBB.

"I spoke to John. He is concerned about sunshine issue," Mapes wrote.

On July 11, Mapes sent Vincent, Metz and others an e-mail referencing a parking garage prohibition and the city's future land use map.

CO-PLAINTIFFS

On Thursday, Aug. 3, commissioners voted 5-0 in favor of joining the proposed legal action at a cost not to exceed \$5,000. This was after Perry told them three potential plaintiffs contacted Barfield. The commission agreed that joining as co-plaintiffs

would signify proactive measures being taken by the city to address existing and future Sunshine concerns.

Earlier that day, Metz suggested the city would pay the board members' legal fees if legal action ensued. It's unlikely the city, as co-plaintiffs, will do that.

On Monday, Aug. 7, Clarke reached agreement with Watrous to serve as a plaintiff and the commission voted 3-1 in favor of Mayor Bill Shearon executing a similar retainer agreement on the city's behalf. Shearon said he changed his mind and now opposed the legal action. Martin, his life partner, had not yet been named as a defendant.

Commissioner Marilyn Maro was not present for the Aug. 7 vote.

"As a former city official, I am acutely aware of the Florida statutes referred to as Sunshine Law," Clarke said later. "When it became clear to me that the core group of CNOBB disregarded these laws, I sought remedy against those I knew were putting the city at risk."

In 2015, Barfield assisted in the successful defense of a lawsuit Metz filed against Clarke.

Charter amendment e-mails revealed

CNOBB members' efforts to amend the city charter have produced some insightful e-mail exchanges.

BY JOE HENDRICKS

SUN CORRESPONDENT | jhendricks@amsum.com

BRADENTON BEACH – In their efforts to form the Concerned Neighbors of Bradenton Beach (CNOBB) group, several e-mails were exchanged that expressed an intent to empower Mayor Bill Shearon and others by getting three

proposed charter amendments placed on the November ballot.

Last week, six CNOBB members were named as defendants in a Sunshine Law lawsuit. Subsequent public records requests made by paralegal Michael Barfield indicate CNOBB members are concerned that Vice Mayor John Chappie might use the state's resign-to-run provision and challenge Shearon in the November election.

CNOBB members also expressed concerns about the legality of the charter amendment process they initiated with a petition drive last week.

STRONGER MAYOR?

On June 10, CNOBB founder Bill Vincent sent an e-mail to future CNOBB member Reed Mapes that said, "I had a lengthy telephone conversation this morning. Mayor Shearon suggested I contact (you) regarding an initiative I am pursuing. Both the mayor and I believe you might be interested and would certainly be of value to our group."

On June 24, CNOBB member John Metz sent an e-mail response to Mapes about empowering the

SEE EMAILS, PAGE 31

E-MAILS: Revealed

FROM PAGE 1

mayor with a charter amendment that addresses charter interpretation and/or a strong mayor amendment.

"If we are giving the mayor back his power, I would include the power to hire and fire any employee or contract person without limit," Metz wrote.

"Giving him back the powers he has under the charter should not be hard and will give us some working time and allow us to get rid of the lawyer (City Attorney Ricinda Perry) and then change the form of gov't," Mapes wrote.

Bradenton Beach's weak mayor form of government prevents Shearon or any other mayor from firing any contracted, salaried or hourly city employee. By majority vote, the commission can terminate a department head or a charter official such as the city clerk, city attorney or police chief. Only a department head can terminate a regular employee.

One of CNOBB's proposed charter amendments seeks to prevent the city commission from adopting ordinances and resolutions that interpret the city charter. This is aimed at commission-initiated proposals adopted in recent years supporting the commission's stance that

the charter says department heads answer to the commission as a whole and not to the mayor exclusively. In 2016, the commission adopted a resolution preventing the mayor from controlling meeting agendas. CNOBB members have discussed rescinding these past commission actions.

OPPOSING CHAPPIE

On July 23, Mapes and CNOBB members Janie Robertson and Michael Harrington exchanged e-mails about Chappie challenging Shearon.

The qualifying period begins Aug. 28 and ends Sept. 1. If Chappie challenges Shearon, his current Ward 4 commission seat will become vacant immediately after the election, whether he wins or loses. That seat will then be filled by a commission-appointed replacement who would serve the remaining year of Chappie's two-year Ward 4 term.

On Jul 22, Robertson wrote, "If Chappie were to challenge for mayor, he should not be allowed to hold his ward seat past the qualifying date and not allow Bill V. (Vincent) to qualify to fill it at the election. This could happen this election and then someone such as

There is legal court precedence requiring the city to do this and even if what we want is illegal it must go on the ballot and fight it in the courts afterwards if it passes."

Reed Mapes
CNOBB member

(Jan) Vosburgh or (Jim) Lynch could be appointed over Bill V. I fear this move is already in the works. Diabolical. Consult with Metz on this."

On July 23, Robertson added, "This is a huge problem we have."

In response, Mapes wrote, "One option would be to not allow a sitting commissioner to run for mayor. I'm not sure that would be legal, but respect for their position would be to complete their term."

THE INITIATIVE PROCESS

CNOBB's efforts to amend the city charter without following the normal charter review process includes asking city voters to eliminate the city's four geographical commission wards and reducing candidate residency requirements from two years to one.

On Aug. 1, Mapes e-mailed several CNOBB members and attorney Bob Hendrickson about the charter amendment process.

"There is legal court precedence requiring the city to do this, and even if what we want is illegal, it must go on the ballot and fight it in the courts afterwards if it passes," he wrote.

On Monday, City Clerk Terri Sandlemente delivered the signed CNOBB petition signatures to the Supervisor of Elections office for signature verification. Supervisor of Elections Mike Bennett was also presented with a 14-page memo that addresses the city's concerns about legality and procedural compliance.

These concerns will be addressed at the Thursday, Aug. 17, commission meeting.

The CNOBB e-mail exchanges have not been error-free. On July 25, Martin sent an e-mail to CNOBB members that said, "Oh my God I just did a 'reply all' and you had Terri and Ricinda on the list. Please if you're going to communicate with them do it in a separate format do not include us in it. God only knows how they'll take this."

Listen in

I, John Metz, Patty Shay and Bill Vincent have been accused of a Sunshine Law violation.

If you are interested in why the city of Bradenton Beach is wasting most likely in excess of \$5,000 to punish four members of your city who are fighting to help preserve your neighborhoods, go to cnobb.org/meetings-minutes and click on the button "Steering Minutes Audio -7/25/2017."

You will be able to listen to our conversation.

Please, start the file and slide the button on the bar to the 17:20-minute mark and listen through the 18:45 mark, and then listen from the 25:00 mark and thru the 29:35-minute mark.

See if you think the city should be wasting your tax money.

Mind you, they are supporting a claim by former Mayor Jack Clarke and basically paying for his lawsuit to prevent him from suing the city as a vendetta against his loss as mayor and a money-making scheme, all of this instead of sticking up for four of us who have worked tirelessly to support our citizens.

I surely wouldn't recommend being a volunteer for anything in this city.

Remember this at election time.

By the way, if you believe a charter amendment against a parking garage is a good idea, leave us a message at www.cnobb.org/contact.

We will continue to work for you.

Reed Mapes, Bradenton Beach

Punishing Work

Since the city of Bradenton Beach has sued six of its volunteer board members, plenty of vacancies need to be filled.

P & Z volunteers should be ready to learn, on their own, 230 pages of technical land use regulations and take a Sunshine course.

Also, as an "advisory" board, you only make recommendations, not decisions. About 90 percent of the time, the commission will overturn or ignore your recommendations you spent weeks or months studying.

If the city turns around and sues you, you get to pay for your own lawyer while facing threats of fines and paying the other party's attorney fees.

It can be expensive to be a volunteer.

John Metz, Bradenton Beach

John Metz, Letter to the Editor,
Punishing Work, Anna Maria
The Islander August 23, 2017.

Bullying in Bradenton Beach

Aug. 4, three Bradenton Beach planning and zoning members resigned after a week of threats from city manager, sorry, city attorney Ricinda Perry about being sued. Uncontrolled and unsupervised, Perry is the city bully.

P&Z members are expected to learn and know some 230 pages of land-use regulations. Who wants these volunteers to be then threatened with lawsuits, civil penalties and fines, or possible criminal action? That volunteer needs that?

The P&Z is without a quorum now. That business stopped. Good luck in finding replacements.

It would better to get rid of the city attorney and to back the bullied members.

John Metz, Bradenton Beach

John Metz, Letter to the Editor,
Bullying in Bradenton Beach, Anna
Maria The Islander August 9, 2017.

From: **Ricinda Perry** ricinda@verizon.net
 Subject: Re: Thank you for the forms for the citizens' initiative
 Date: July 25, 2017 at 7:21 PM
 To: Reed Mapes reed.mapes@outlook.com
 Cc: Terri Sanclemente (tsanclemente@cityofbradentonbeach.com) tsanclemente@cityofbradentonbeach.com,
 John Metz (metz1419@gmail.com) metz1419@gmail.com, Rose Vincent rosemv1963@gmail.com, Michael Harrington mharr77@gmail.com, Janie Robertson jsrfla@hotmail.com, Joann Keir joke229@juno.com, Tjet Martin tjet62@gmail.com,
 Bill Vincent WWGGVV46@gmail.com, Patty Shay patriciashay@aol.com, Mike Bazy dockmaster@bradentonbeachmarina.com,
 Carol Harrington carolhar213@gmail.com, Mayor William Shearon mayor@cityofbradentonbeach.com,
 Commissioner Jake Spooner ward1@cityofbradentonbeach.com, Commissioner Marilyn Maro ward2@cityofbradentonbeach.com,
 Commissioner Ralph Cole ward3@cityofbradentonbeach.com, Commissioner John Chappie ward4@cityofbradentonbeach.com

Mr. Mapes,

I would strongly advise following the requirements of the form and the directions of Ms. Sanclemente. Please note that you cannot "amend the charter" as there are technicalities to be followed. An opportunity to "amend the charter" occurred recently by local citizens who served on the Charter Review Committee. Your concerns could have been addressed at that time and rolled into the citizens' recommendations - which, as you may or may not know, were presented to the electors of this City on August 30, 2016, after further vetting by the City Commission in public hearings. It was a very involved process that was wide open to the public with many opportunities to participate, offer suggestions, and speak on topics of concern. To effectuate an amendment after the Charter Review Committee has completed its work, one *must create an ordinance* that contains charter provisions that you wish to modify. Thus, the purpose of the petition is to request an ordinance and not to amend the charter. Semantics are relevant.

Also, my office has been contacted by a number of citizens asking why a group is looking to circumvent the Charter Review Process and take it "hostage". (Their words, not mine.) Some have also shared that they are concerned with this cost and that it appears the group coming forward is disregarding the work of those who served the City last year and that they wonder why your concerns weren't brought up in the public Charter Review Committee meetings or with the Commission at that time. You may want to take this into consideration as you advance this process. For your edification, I have attached the report from the Charter Review Committee. Please advise if you have any difficulties opening the document.

Finally, it appears that more than one Planning and Zoning Board Member is copied on this email and I presume commenting and participating in this effort. You should take extreme caution to not cause any Sunshine Violations. If a single idea or topic in your "private discussions" may reasonably come before the PZ, then you have violated the Sunshine Law. It is more than advisable that Board members hold themselves to a high standard and that they avoid the appearance of impropriety. Likewise, I have received calls of concern regarding the CNOBB meetings. A similar situation occurred not long ago where an out of town attorney raised a formal complaint on PZ members participating in discussions where the meetings were unnoticed, off-site and wholly failed to comply with the Sunshine Law. **This email shall serve as notice by the City of Bradenton Beach that you have been notified of your legal obligations as Planning and Zoning Board members and members of the Land Planning Agency as well as members of the Scenic Highway Committee regarding the Sunshine Law.**

IF ANYONE CHOOSES TO RESPOND TO ME REGARDING THIS EMAIL, PLEASE DO NOT HIT REPLY ALL, NOR BLIND COPY OTHERS.



1.CRC Report.
 2015.pdf

Ricinda H. Perry, Esq.
 Telephone: (941)526-6468
 Facsimile: (941)209-5302
 Email: ricinda@verizon.net

