



PALM BEACH COUNTY COMMISSION ON ETHICS
 300 North Dixie Highway, Suite 450, West Palm Beach, Florida 33401
 Hotline: 877-766-5920 or 561-355-1915

COMPLAINT FORM

1. Complainant (Person bringing Complaint) Add pages, if necessary.

Please list all information where you would like to be contacted. Our preference is email.

Name: Todd Bonlarron, Director of Legislative Affairs E-Mail tbonlarr@pbcgov.org
 Address: 301 N. Olive Avenue
 City: West Palm Beach Zip: 33401
 Home #: _____ Work #: 561-355-3451 Cell #: _____

2. Respondent (Person against whom complaint is made) Add pages, if necessary.

Please provide as much information as possible.

Name: Paul J Martin, Jr. Capital Solutions Plus, Inc. ; Future Energy Solutions E-Mail PAULJMARTINJR@GMAIL.COM
 Address: 401 S County Rd
 City: Palm Beach, FL Zip: 33480
 Home #: _____ Work #: (631) 757-7100 Cell #: _____
 Title/Office Held or Sought: Lobbyist

3. IF KNOWN, CHECK THE BOX OR BOXES THAT APPLY

- Allegation is against a lobbyist and/or a principal or employer of a lobbyist Allegation is about County/Municipal/Whistleblower Retaliation

4. STATEMENT OF FACTS BASED ON YOUR PERSONAL KNOWLEDGE

In a separate attachment, please describe in detail the facts and actions that are the basis of your complaint, including the dates when the actions occurred. Also attach any relevant documents as well as names and contact information of persons who may be witnesses to the actions. If known, indicate the section of the ordinance you believe is being violated. For further instructions, see page 2 of this form.

5. OATH

I, the person bringing this complaint, do depose on oath or affirmation and say that the facts set forth in the foregoing complaint and attachments are true and correct, to the best of my knowledge and belief.

Todd Bonlarron
 Signature of Person Making Complaint

STATE OF FLORIDA

COUNTY OF Palm Beach

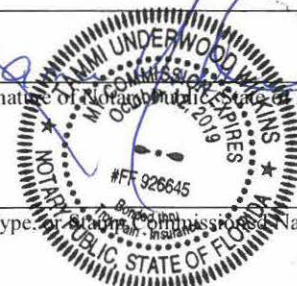
Sworn to (or affirmed) and subscribed before me this 6th day of November, 2015, by

Todd Bonlarron,

(Name of Person Making Statement)

who is personally known to me or produced identification _____. Type of identification produced:

Joseph Underwood
 (Signature of Notary Public, State of Florida)



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



Tammy Gray L.

From: Tammy Gray L.
Sent: Monday, September 21, 2015 8:49 AM
To: 'aaron@richardsonpartners.com'; 'acl@floridahardhatlaw.com'; 'ailish@mlpc.net'; 'aciklin@caseyciklin.com'; 'alan.fant@glhomes.com'; 'alan@alanvordermeierjr.com'; 'apalmer@coteleur-hearing.com'; 'apalmer@udkstudios.com'; 'alec@aldlaw.org'; 'alex.ring@seiufpsu.org'; 'amalefatto@llw-law.com'; 'amz@kubickidraper.com'; 'rquintavalli@shubinbass.com'; 'aparke@ssclawfirm.com'; 'andygross@huntgross.com'; 'abaumann@llw-law.com'; 'angelina.fairchild@kimley-horn.com'; 'anita@charlottepelton.com'; 'anitamg@gmail.com'; 'a booth@udkstudios.com'; 'anniedelgado2@yahoo.com'; 'dmainc@gate.net'; 'acoosaia@zonelaw.com'; 'balterman@torcivialaw.com'; 'Hallb@gtlaw.com'; 'brichardson@shutts.com'; 'beth-ann.krimsky@gmlaw.com'; 'bpowell@udkstudios.com'; 'Bmiskel@dmbblaw.com'; 'bradley@mlpc.net'; 'brett@iegroup.net'; 'darlenes@coteleur-hearing.com'; 'bseymour@gunster.com'; 'bterry@landdesignsouth.com'; 'bryan.cook@cvscaremark.com'; 'baaranson.grp@hotmail.com'; 'carlos.maeda@kimley-horn.com'; 'carmenjgimenez@gmail.com'; 'cbowen@abceastflorida.com'; 'caroline.villanueva@floridacrystals.com'; 'caroline.villanueva@floridacrystals.com'; 'fernandez@uber.com'; 'crb@mallorylawgroup.com'; 'charlieb@reagan.com'; 'chip@gsagritek.com'; 'cdudley@flapartners.com'; 'cmillar@shutts.com'; 'cpattison@1000fof.org'; 'charlie.simon@gray-robinson.com'; 'charlotte@charlottepelton.com'; 'christi@mlpc.net'; 'christian@palmbeachpremier.com'; 'cbilenki@dmbblaw.com'; 'cbarry@udkstudios.com'; 'cschulle@wasteprousa.com'; 'csummers@energysystemsgroup.com'; 'clark.stephens@gray-robinson.com'; 'claudia@adamsstadvocates.com'; 'chertz@broadandcassel.com'; 'cwalter@udkstudios.com'; 'curtis@mlpc.net'; 'dbrink@jesla.com'; 'dan@landscape-architects.com'; 'darlenes@coteleur-hearing.com'; 'dbaker@jtrinc.com'; 'dmartell@economiccouncilpbc.org'; 'daniel.hanlon@hkklaw.com'; 'dmccormick@udkstudios.com'; 'drosenbaum@r-mlaw.com'; 'danny@gliddenspina.com'; 'dave.bardt@kimley-horn.com'; 'david.baker@amrl.com'; 'janet@ericksconsultants.com'; 'commkay@aol.com'; 'dma@davidmillerarchitect.com'; 'dmccormick@wm.com'; 'dean.turney@att.net'; 'orshefskyd@gtlaw.com'; 'dgrady@palmbeaches.org'; 'dbruce@gunster.com'; 'dmendez@lsnpartners.com'; 'dhall@rapb.com'; 'dodi@2gho.com'; 'don@ddgovconsulting.com'; 'mathisgrp@aol.com'; 'donald_kiselewski@fpl.com'; 'munksgaarddg@gmail.com'; 'darlenes@coteleur-hearing.com'; 'dmurray@landdesignsouth.com'; 'DDickerson@dmbblaw.com'; 'Dylan@2gho.com'; 'lworsham@shutts.com'; 'eweinberg@ewconsultants.com'; 'ezlanduse@gmail.com'; 'ehertz@r-mlaw.com'; 'esmith13@wm.com'; 'ehalperin@halperinbarkdull.com'; 'ellyn.bogdanoff@gmail.com'; 'ejrobarts@yahoo.com'; 'emily@2gho.com'; 'erin@deadylaw.com'; 'ehendrix@lsnpartners.com'; 'darlenes@coteleur-hearing.com'; 'ernie@familylandsremembered.biz'; 'ethel.williams@fpl.com'; 'flynch@blesmlaw.com'; 'lfsconsult954@att.net'; 'fa@weissandhandlerpa.com'; 'garyh@hgslaw.com'; 'gary@brandenburgpa.com'; 'Gwalk@ciklinlubitz.com'; 'gbs@sluggett.com'; 'george@2gho.com'; 'gplatt@lsnpartners.com'; 'gladys.digirolamo@glhomes.com'; 'gwjeff2@gmail.com'; 'gkino@ciklinlubitz.com'; 'goravec@comcast.net'; 'gthomp11@wm.com'; 'hcarter@wm.com'; 'hjones@harryjonesconsulting.com'; 'jsanchez@shutts.com'; 'dempseyh@gtlaw.com'; 'turnbullh@rubingroup.com'; 'hcohen@udkstudios.com'; 'hbh@weissandhandlerpa.com'; 'HCalhoun@dmbblaw.com'; 'hsearcy@jtrinc.com'; 'hperry@gunster.com'; 'hunruh1@icloud.com'; 'husein.cumber@feci.com'; 'ilenemichelson@aol.com'; 'jackie@jackiealbarran.com'; 'jcrowley@gunster.com'; 'jameskgreen@bellsouth.net'; 'Michael.marshall@gray-robinson.com'; 'jnorquest@gunster.com'; 'james@iegroup.net'; 'darlenes@coteleur-hearing.com'; 'jgraham@audubon.org'; 'janna.lhota@hkklaw.com'; 'jason.lazarus@hkklaw.com'; 'jbridge@udkstudios.com'; 'jsabin@wm.com'; 'jzito@atlanticland.com'; 'jeffkurtzlaw@comcast.net'; 'jbass@shubinbass.com'; 'jbrophy@landdesignsouth.com'; 'jlynn@zonelaw.com'; 'jennifer.morton@wantmangroup.com'; 'jmorton@jmortonla.com'; 'jvail@landdesignsouth.com'; 'JShapiro@gunster.com'; 'jillelisofon@aol.com'; 'capercat@bellsouth.net'; 'jstanley@republicservices.com'; 'jeubanks@blesmlaw.com'; 'jlittle@gunster.com'; 'jmetzger@mcdonaldhopkins.com'; 'john.chibbaro@akerman.com'; 'john@gliddenspina.com'; 'john.herin@gray-robinson.com'; 'john.hillman@kimley-horn.com'; 'john.potts@kimley-horn.com'; 'jerobarts@yahoo.com'; 'jshubin@shubinbass.com'; 'dave@cwassoc.com'; 'jonlev@bellsouth.net'; 'jschmidt@jesla.com'; 'jricketts@jtrinc.com'; 'jbrinkman@udkstudios.com'; 'jordan@jordanconnors.com'; 'jose.gonzalez@feci.com';

To: 'jverdone@carltonfields.com'; 'ja@weissandhandlerpa.com'; 'jgoldstein@shutts.com';
'jmaus@mauslawfirm.com'; 'jlong@gunster.com'; 'jnichols@jesla.com';
'juan.espinosa@dplummer.com'; 'jortega@landdesignsouth.com'; 'jhill-gabriel@audubon.org';
'Karentmarcus@gmail.com'; 'kscheuerman@ssclawfirm.com'; 'darlenes@coteleur-
hearing.com'; 'kwaldron@gamxing.com'; 'katerno@cleanwater.org';
'keith@jordanogroup.com'; 'kpoliakoff@arnstein.com'; 'keith.odonnell@avisonyoung.com';
'keith@gliddenspina.com'; 'ktuma@udkstudios.com'; 'kspillias@llw-law.com';
'barshk@gtlaw.com'; 'kevin.doyle@wexfordstrategies.com'; 'kevin.greiner@ibigroup.com';
'lrmi@bellsouth.net'; 'kevin.ratterree@glhomes.com'; 'kevin.schanen@kimley-horn.com';
'kkilday@udkstudios.com'; 'kglascastro@bellsouth.net'; 'lschone@lawdelray.com';
'lani.ferro@mch.com'; 'larry.portnoy@glhomes.com'; 'cunninghamlaura@comcast.net';
'holly@westinelaw.com'; 'lmcclellan@jmortonla.com'; 'Lsmith@gdr-law.com';
'lmurrell@atlanticland.com'; 'lsocolow@shutts.com'; 'llibes@landdesignsouth.com';
'lmurphy@udkstudios.com'; 'lwalter@udkstudios.com'; 'lreves@r-mlaw.com';
'lisa@evergladeslaw.org'; 'lcaplan@ssclawfirm.com'; 'lcr5002@aol.com';
'lharris@carltonfields.com'; 'tim.hanlon@amrl.com'; 'maeve.desmond@akerman.com';
'mnolan@bplegal.com'; 'mjhorenburger@aol.com'; 'mark.miller@kimley-horn.com';
'mperry@perrykern.com'; 'm@guzzettacorp.com'; 'mark.rickards@kimley-horn.com';
'mstempler@bplegal.com'; 'marty.alexander@hkklaw.com'; 'fmpferri@perrytaylorlaw.com';
'mminor@udkstudios.com'; 'marwan.mufleh@kimley-horn.com'; 'mem@sluggett.com';
'mat@ballardfl.com'; 'morrall@bellsouth.net'; 'mleger@rapb.com'; 'forgeyplanning@aol.com';
'max.macon@fpl.com'; 'mkostelia@coteleur-hearing.com'; Tammy Gray L.;
'michael.carey@kimley-horn.com'; 'Mike@covellidesign.com';
'michael.davis@wantmangroup.com'; 'mjgelfand@gelfandarpe.com'; 'esi2890@aol.com';
'mmallard@BoosDevelopment.com'; 'mike.schwartz@kimley-horn.com';
'msexton@sextonengineering.com'; 'mike.spruce@kimley-horn.com';
'mweiner@zonelaw.com'; 'michelle@agcfla.com'; 'skovit@stateandfed.com';
'mcuetara@udkstudios.com'; 'mdiffenderfer@llw-law.com'; 'mhoyland@landdesignsouth.com';
'julie.degrandy@hkklaw.com'; 'milindchokshi@yahoo.com'; 'mberger@bergersingerman.com';
'mitch.kirschner@gray-robinson.com'; 'Molly.jennings@scotts.com';
'salour@cypressrealtyfl.com'; 'darlenes@coteleur-hearing.com'; 'Ned@fpma.org';
'nschiller@becker-poliakoff.com'; 'nmihelich@udkstudios.com'; 'pamela.m.rauch@fpl.com';
'pat@2gho.com'; 'pmaaloy@flapartners.com'; 'ppainter@broadandcassel.com';
'PAULJMARTINJR@GMAIL.COM'; 'pbreton@blesmlaw.com'; 'psachs@ssclawfirm.com';
'pjack@jhrjpa.com'; 'ralph@mbeachconsulting.com'; 'Rafael.Rodon@feci.com';
'Ralfbrookes@gmail.com'; 'Ralf@RalfBrookesAttorney.com';
'rrodriguez@mcdonaldhopkins.com'; 'rroyce@shutts.com'; 'rebeccaeshelton@gmail.com';
'julie.degrandy@hkklaw.com'; 'richard.pinsky@akerman.com'; 'rwohlfarth@ibigroup.com';
'turjinc@aol.com'; 'bbentz@landdesignsouth.com'; 'rdiffenderfer@llw-law.com';
'robert@hartsell-law.com'; 'rnhochberg@comcast.net'; 'rmoore2144@att.net';
'robert.leapley@akerman.com'; 'RIM2@osbornepa.com'; 'rsweetapple@sweetapplelaw.com';
'rmarante@strategicaccessgroup.com'; 'ron.klein@hkklaw.com'; 'CleanSlateRK@gmail.com';
'russell.barnes@kimley-horn.com'; 'rjohnston@johnstongroupinc.com';
'rpoliakoff@ssclawfirm.com'; 'spoole@bergersingerman.com'; 'smegrue@udkstudios.com';
'sdeflesco@cleanwater.org'; 'sbackman@dmbblaw.com'; 'sblasie@vacantregistry.com';
'smosolf@udkstudios.com'; 'sbehn@llw-law.com'; 'gsplatt@lsnpartners.com';
'sb@weissandhandlerpa.com'; 'sbroadnix@udkstudios.com'; 'cedcofsfla@aol.com';
'Stan@SmarterStory.com'; 'sjt@trippscott.com'; 'stephanie.mitrione@fpl.com';
'stephen.tilbrook@gray-robinson.com'; 'swalker@llw-law.com'; 'steve.geller@gmlaw.com';
'stephen.leung@dplummer.com'; 'prop2020@aol.com'; 'spawlyk@sextonengineering.com';
'steven.wherry@gmlaw.com'; 'sgiddings@sparehandsinc.com'; 'Susan.Motley@gmlaw.com';
'staylor@perrytaylorlaw.com'; 'tduhy@llw-law.com'; 'tyaques@r-mlaw.com'; 'tlewis@llw-
law.com'; 'tom@mcnicholas.biz'; 'tbaird@jonesfoster.com'; 'tom@consultbarlow.com';
'tomderitafl@gmail.com'; 'thanson@carltonfields.com'; 'tplante123@aol.com';
'tbowers@wasteprousa.com'; 'tim.plummer@dplummer.com';
'tinabrilliantminds@comcast.net'; 'Todd@joskoassociates.com'; 'tcarabine@aol.com';
'tpanza@panzamaurer.com'; 'troy@2gho.com'; 'wooldridgev@sfrta.fl.gov'; 'vb2674@att.com';
'Jackeline.Gil-Rendon@feci.com'; 'vinetteg@hgslaw.com'; 'flobbyist@aol.com';
'Wendy.larsen@gray-robinson.com'; 'wtuma@udkstudios.com'; 'wesblackman@gmail.com';
'correnteco@gmail.com'; 'skovit@stateandfed.com'; 'bpfeffer@bowmanconsulting.com';
'wepruitt@snedpruitt.com'; 'watterbury@amrl.com'; 'wcw@teamplaninc.com';
'darlenes@coteleur-hearing.com'; 'markfoley5@gmail.com'; 'michael@johnstongroupinc.com';
'richard.chip.carlson@usa.net'; 'shellyspivack@aol.com'

Cc: Gina A. Levesque; Todd J. Bonlarron; Joseph Sophie

Subject: NOTICE - Lobbyist Expenditure Reports are Due on 11/1/15
Attachments: Lobbyist_Registration_Ordinance-2012.pdf; Lobbyist Expenditure Report 2015.pdf
Importance: High

**LOBBYIST EXPENDITURE REPORTS
ARE DUE NOVEMBER 1, 2015
for the reporting period of 10/1/14 – 9/30/15.**

PALM BEACH COUNTY LOBBYIST REGISTRATION ORDINANCE
EFFECTIVE – APRIL 2, 2012
ARTICLE VIII. LOBBYIST REGISTRATION

You may enter your expenditure reports online, by using the link below:

<https://secure.co.palm-beach.fl.us/lrs/Main/Login.aspx>

If you do not know your userID, please email Tammy Gray tgray@pbcgov.org

Once you log in, click on “Expenditure Reports link”. Click on each principal separately to enter the report for that principal.

Be sure to click on the **I Acknowledge** button and enter your **initials**.

Then click on the **save and submit** button.

If you would rather fill out the paper expenditure report instead of using the online system, the form is attached. Please fill out a form for each principal you represent and **return the original signed form(s) to Legislative Affairs for processing.**

(d) Reporting of expenditures. Commencing November 1, 2011, and by November 1 of each year thereafter, all lobbyists shall submit to the Central Lobbyist Registration Site a signed statement under oath listing all expenditures made by the lobbyist in lobbying county or municipal officials and employees in excess of twenty-five dollars (\$25) for the preceding fiscal year commencing on October 1 and ending on September 30. **A statement shall be filed even if there have been no expenditures during the reporting period.** The statement shall list in detail each expenditure category, including food and beverage, entertainment, research, communications, media advertising, publications, travel, lodging and special events. Political contributions and expenditures which are reported under election laws as well as campaign-related personal services provided without compensation are excluded from the reporting requirements. A lobbyist or principal’s salary, office overhead expenses and personal expenses for lodging, meals and travel also are excluded from the reporting requirements. Research is an office expense unless it is performed by independent contractors rather than by the lobbyist or the lobbyist’s firm.

(1) The county administrator of the Central Lobbyist Registration Site shall provide notice of violation to any lobbyist who fails to timely file an expenditure report and shall also notify the county commission on ethics of this failure. In addition to any other penalties which may be imposed under this article, any lobbyist who fails to file the required expenditure report within thirty (30) days of the date of notice of violation shall be suspended from lobbying unless the notice of violation has been appealed to the commission on ethics.

Contact Tammy Gray at 355-2754 with any questions.

Tammy Gray

Palm Beach County Public Affairs Dept.

301 N. Olive Ave, Suite 1102

West Palm Beach, FL 33401

561.355.1850

tgray@pbcgov.org

Tammy Gray L.

From: Tammy Gray L.
Sent: Monday, October 19, 2015 12:28 PM
To: 'PAULJMARTINJR@GMAIL.COM'
Cc: Gina A. Levesque
Subject: REMINDER NOTICE - Lobbyist Expenditure Reports are Due on 11/1/15
Attachments: Lobbyist Expenditure Report 2015.pdf; Expenditure Reports timeline.docx

Importance: High

**LOBBYIST EXPENDITURE REPORTS
ARE DUE NOVEMBER 1, 2015
for the reporting period of 10/1/14 – 9/30/15.**

PALM BEACH COUNTY LOBBYIST REGISTRATION ORDINANCE
EFFECTIVE – APRIL 2, 2012
ARTICLE VIII. LOBBYIST REGISTRATION

You may enter your expenditure reports online, by using the link below:

<https://secure.co.palm-beach.fl.us/lrs/Main/Login.aspx>

If you do not know your userID, please email Tammy Gray tgray@pbcgov.org

Once you log in, click on “Expenditure Reports link”. Click on each principal separately to enter the report for that principal.

Principal

Martin Jr, Paul J

Company

Capital Solutions Plus, Inc. Future Energy Solutions

Be sure to click on the **I Acknowledge** button and enter your **initials**.

Then click on the **save and submit** button.

If you would rather fill out the paper expenditure report instead of using the online system, the form is attached. Please fill out a form for each principal you represent and **return the original signed form(s) to Legislative Affairs for processing**.

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well as campaign-related personal services provided without compensation are excluded from the reporting requirements. A lobbyist or principal's salary, office overhead expenses and personal expenses for lodging, meals and travel also are excluded from the reporting requirements. Research is an office expense unless it is performed by independent contractors rather than by the lobbyist or the lobbyist's firm.

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Contact Tammy Gray at 355-2754 with any questions.

Tammy Gray

Palm Beach County Public Affairs Dept.

301 N. Olive Ave, Suite 1102

West Palm Beach, FL 33401

561.355.1850

tgray@pbcgov.org

Tammy Gray L.

From: Joseph Sophie
Sent: Monday, November 02, 2015 10:39 AM
To: Tammy Gray L.
Subject: FW: Lobbyist expenditure report
Attachments: Lobbyist Expenditure Report 2015.pdf

Importance: High

Joseph Sophie

Legislative Delegation Aide
Palm Beach County Legislative Affairs
301 N. Olive Avenue, Suite 1101
West Palm Beach, FL 33401
Office: 561-355-3452
Fax: 561-242-7620
jsophie@pbcgov.org

From: Joseph Sophie
Sent: Thursday, October 29, 2015 1:08 PM
To: 'pauljmartinjr@gmail.com'
Subject: Lobbyist expenditure report
Importance: High

Hi, Paul. We are emailing to remind you that we still need to receive a lobbyist expenditure report from you. If we don't, we are required to send your name to the Commission on Ethics. Please fill out the attached expenditure report and email back to me by 11/1/15. Thank you.

Joseph Sophie

Legislative Delegation Aide
Palm Beach County Legislative Affairs
301 N. Olive Avenue, Suite 1101
West Palm Beach, FL 33401
Office: 561-355-3452
Fax: 561-242-7620
jsophie@pbcgov.org

Tammy Gray L.

From: Tammy Gray L.
Sent: Friday, October 30, 2015 7:12 AM
Cc: Gina A. Levesque
Subject: FINAL NOTICE - Only 2 days left to file lobbyist expenditure reports
Attachments: Lobbyist Expenditure Report 2015.pdf

Importance: High

Tracking:	Recipient	Read
	Gina A. Levesque	Read: 10/30/2015 7:58 AM
	Todd J. Bonlarron	
	'amz@kubickidraper.com'	
	'rquintavalli@shubinbass.com'	
	'anniedelgado2@yahoo.com'	
	'brichardson@shutts.com'	
	'bryan.cook@cvscaremark.com'	
	'charlieb@reagan.com'	
	'cmillar@shutts.com'	
	'charlie.simon@gray-robinson.com'	
	'csummers@energysystemsgroup.com'	
	'dmccormick@wm.com'	
	'dmendez@lsnpartners.com'	
	'ezlanduse@gmail.com'	
	'lfsconsult954@att.net'	
	'Michael.marshall@gray-robinson.com'	
	'jeffkurtzlaw@comcast.net'	
	'jbass@shubinbass.com'	
	'john@gliddenspina.com'	
	'jshubin@shubinbass.com'	
	'dave@cwiasoc.com'	
	'ja@weissandhandlerpa.com'	
	'juan.espinosa@dplummer.com'	
	'jhill-gabriel@audubon.org'	
	'kspillias@llw-law.com'	
	'holly@westinelaw.com'	
	'Lsmith@gdr-law.com'	
	'lmurrell@atlanticland.com'	
	'lharris@carltonfields.com'	
	'mjhorenburger@aol.com'	
	'forgeyplanning@aol.com'	
	'mjgelfand@gelfandarpe.com'	
	'mmailard@BoosDevelopment.com'	
	'mike.schwartz@kimley-horn.com'	
	'mike.spruce@kimley-horn.com'	
	'michelle@agcfla.com'	
	'PAULJMARTINJR@GMAIL.COM'	
	'ralph@mbeachconsulting.com'	
	'rodriguez@mcdonaldhopkins.com'	

Recipient	Read
'bbentz@landdesignsouth.com'	
'rmarante@strategicaccessgroup.com'	
'CleanSlateRK@gmail.com'	
'prop2020@aol.com'	
'sgiddings@sparehandsinc.com'	
'tom@mcnicholas.biz'	
'tomderitafl@gmail.com'	
'tplante123@aol.com'	
'tinabrilliantminds@comcast.net'	
'Wendy.larsen@gray-robinson.com'	
'bpfeffer@bowmanconsulting.com'	
'richard.chip.carlson@usa.net'	

You have **2 days left** to process your 2015 lobbyist expenditure reports.

If your report(s) are not submitted in the system, email back to us or received in our office by 11/1/2015, you **will be in violation** of the Lobbyist Registration Ordinance.

The violation will be submitted to the Commission on Ethics and may further lead to suspension of lobbying within all entities that participate in the Palm Beach County Lobbyist Registration System.

Please contact me if you have any questions.

Tammy Gray

Palm Beach County Public Affairs Dept.

301 N. Olive Ave, Suite 1102

West Palm Beach, FL 33401

561.355.1850

tgray@pbcgov.org



Legislative Affairs

301 North Olive Avenue, Suite 1101.4

West Palm Beach, FL 33401

(561) 355-3451

FAX: (561) 355-3982

www.pbcgov.com



**Palm Beach County
Board of County
Commissioners**

Shelley Vana, Mayor

Mary Lou Berger, Vice Mayor

Hal R. Valeche

Paulette Burdick

Steven L. Abrams

Melissa McKinlay

Priscilla A. Taylor

County Administrator

Verdenia C. Baker

November 6, 2015

TO: Mark Bannon, Interim Executive Director
Commission on Ethics

FROM: Todd Bonlarron, Director
Legislative Affairs

RE: Violation of Lobbyist Registration Ordinance

The following lobbyists are in violation of the Lobbyist Registration Ordinance, Sec. 2-353 (d) Registration and Expenditures.

Christopher Summers – currently suspended

Paul Martin, Jr.

Steven Smith – currently suspended

These lobbyists were notified by email on 9/21/15, 10/19/15, 10/30/15 that the expenditure reports were due on or before 11/1/15.

They were also notified by phone on 10/28/15 or 10/29/15, which included a follow up email relating to the phone call.

Attached are the complaints and relevant documents relating to this violation.

Please contact me for any additional information that is required.

Regards,

Todd Bonlarron, Director
Legislative Affairs

"An Equal Opportunity
Affirmative Action Employer"



Legislative Affairs

11 North Olive Avenue, Suite 1101.4
West Palm Beach, FL 33401
(561) 355-3451
FAX: (561) 355-3982
www.pbcgov.com

**Palm Beach County
Board of County
Commissioners**

Shelley Vana, Mayor
Mary Lou Berger, Vice Mayor
Hal R. Valeche
Paulette Burdick
Steven L. Abrams
Melissa McKinlay
Priscilla A. Taylor

County Administrator

Verdenia C. Baker

"An Equal Opportunity
Affirmative Action Employer"

Official Electronic Letterhead

November 6, 2015

Paul J Martin, Jr
401 S County Rd
Palm Beach, FL 33480

Re: Lobbyist Expenditure Report

NOTIFICATION OF VIOLATION


Pursuant to Palm Beach County Lobbyist Registration Ordinance

Pursuant to Sec. 2-353(d)¹ of the Palm Beach County Lobbyist Registration Ordinance (Ordinance), you are hereby notified that you have failed to file a 2015 Expenditure Report. As such, pursuant to Section 2-353(d)(1)² of the Ordinance, you have 30 days from the date of this letter to file the expenditure report without recrimination. In the event you do not file the expenditure report within 30 days from the date of this letter, you will be suspended from all lobbying activities in the county. Additionally, a copy of this violation and the file will be forwarded to the Commission on Ethics for further investigation.

After a complete investigation, if the Commission on Ethics finds the violation to be willful and knowing, pursuant to Section 2-357(6) of the Ordinance, a copy of the findings shall be referred to the State Attorney's Office³ for criminal prosecution.

Please contact Tammy Gray, Public Affairs, at 561-355-2754 with any questions you may have.

Regards,


Todd J. Bonlarron, Director
Legislative Delegation

¹ §2-353(d) states in relevant part ...all lobbyists shall submit to the Central Lobbyist Registration Site a signed statement under oath listing all expenditures made by the lobbyist in lobbying county or municipal officials and employees in excess of twenty-five dollars (\$25) for the preceding fiscal year commencing on October 1 and ending on September 30. A statement shall be filed even if there have been no expenditures during the reporting period. The statement shall list in detail each expenditure category, including food and beverage, entertainment, research, communications, media advertising, publications, travel, lodging and special events...

² §2-353(d)(1) The county administrator of the Central Lobbyist Registration Site shall provide notice of violation to any lobbyist who fails to timely file an expenditure report and shall also notify the county commission on ethics of this failure. In addition to any other penalties which may be imposed under this article, any lobbyist who fails to file the required expenditure report within thirty (30) days of the date of notice of violation shall be suspended from lobbying unless the notice of violation has been appealed to the commission on ethics.

³ §2-357(6) - Willful and knowing violations of this article shall be referred by the commission on ethics to the state attorney for prosecution in the same manner as a first degree misdemeanor pursuant to Florida Statutes, §125.69. Failure or refusal of any lobbyist to comply with any order of the commission on ethics shall be punishable as provided by law, and shall otherwise be subject to such civil remedies as the county or municipality as applicable may pursue, including injunctive relief.



County Administration

P.O. Box 1989
West Palm Beach, FL 33402-1989
(561) 355-2030
FAX: (561) 355-3982
www.pbcgov.com



**Palm Beach County
Board of County
Commissioners**

Mary Lou Berger, Mayor
Hal R. Valeche, Vice Mayor
Paulette Burdick
Shelley Vana
Steven L. Abrams
Melissa McKinlay
Priscilla A. Taylor

County Administrator

Verdenia C. Baker

December 5, 2015

Paul J. Martin Jr
Capital Solutions Plus, Inc.; Future Energy Solutions
401 S. County Road
Palm Beach, FL 33480

Dear Mr. Martin,

NOTIFICATION OF SUSPENSION

Pursuant to Palm Beach County Lobbyist Registration Ordinance

Pursuant to Section 2-353(d)(1)¹ of the Palm Beach County Lobbyist Registration Ordinance, on November 3, 2015, you were issued a Notice of Violation for your failure to file an expenditure report. A copy of said notice was forwarded to the Palm Beach County Commission on Ethics.

This correspondence shall serve as official notification that you are hereby suspended from all lobbyist activity within Palm Beach County, effective immediately.

This suspension is final unless original expenditure report documentation is received and eligibility is reinstated by the County.

Regards,

Todd J. Bonlarron, Director
Legislative Affairs

Copies to: Palm Beach County Commission on Ethics
Central Lobbyist Registration Website Administrator

*"An Equal Opportunity
Affirmative Action Employer"*

Official Electronic Letterhead

¹ §2-353(d)(1) The county administrator of the Central Lobbyist Registration Site shall provide notice of violation to any lobbyist who fails to timely file an expenditure report and shall also notify the county commission on ethics of this failure. In addition to any other penalties which may be imposed under this article, any lobbyist who fails to file the required expenditure report within thirty (30) days of the date of notice of violation shall be suspended from lobbying unless the notice of violation has been appealed to the commission on ethics.

PALM BEACH COUNTY COMMISSION ON ETHICS
REPORT OF INVESTIGATION

To: Palm Beach County Commission on Ethics
From: Mark E. Bannon, Executive Director
Re: C15-025 – Paul Martin, Jr., Lobbyist, Capital Solutions Plus, Inc.

- **Background**

On November 6, 2015, COE staff received a signed and sworn Complaint also dated November 6, 2015, from Todd Bonlarron, Director of PBC Legislative Affairs. Attached to the Complaint were several other documents relating to the allegations within the Complaint. Legislative Affairs is a department within Palm Beach County government. Among its responsibilities is to act and the administrator of the county's Central Lobbyist Registration Site (CLRS), a public computer database housing lobbyist registration information. Mr. Bonlarron is thus the county administrator for the CLRS. He and county staff are also tasked with the responsibility to assure that all paid lobbyists who lobby the county or any of the 35 participating municipal governments are properly registered and follow the required procedures laid out in the PBC Lobbyist Registration Ordinance (the ordinance) for payment of fees and reporting of expenditures. Legislative Affairs is assisted with this function by staff from Public Affairs, which is another county department.

In the November 6th letter, Mr. Bonlarron advised that Respondent, who registered as a paid lobbyist for Capital Solutions Plus, Inc. on April 20, 2014, was in violation of the expenditure reporting requirements found in §2-353(d), *Registration and expenditures*, of the ordinance. The registration covered all 35 of the municipalities who chose to fall within the jurisdiction of the ordinance, and to participate in the CLRS for registration of lobbyists who lobby these municipalities.¹

The letter from Mr. Bonlarron alleges that despite several emails sent by Tammy Gray, Public Affairs Specialist, and Joseph Sophie, Legislative Delegation Aide, notifying each registered lobbyist within the CLRS of their responsibility to report lobbying expenditures yearly, and the requirement to file a statement even if there have been no expenditures during the reporting period, Respondent has failed to comply with the requirements.

The reporting period for lobbyist expenditures commences October 1st and ends September 30th of each year. All expenditures in specific categories of spending as delineated in the ordinance must be reported, and even where there were no expenditures for a specific Principal, a statement must be filed advising that no expenditures were made. On September 21, 2015, Tammy Gray sent an email notification of the requirement to file the expenditures by the November 1st deadline to Respondent followed by a second email notification October 19, 2015. On October 29, 2015, Legislative Delegation Aide Joseph Sophie sent a third notification. October 30, 2015, Tammy Gray sent an email to Respondent entitled, "Final Notice," where she provided notice to Respondent that if his expenditure disclosure was not received by November 1, 2015, his registration would be suspended. County Staff also left a voicemail message for Respondent at the telephone number listed in his registration paperwork on October 28-29, 2015 reiterating the requirement to file this expenditure report prior to November 1, 2015.

On November 6, 2015, Todd Bonlarron sent a "Notification of Violation" to Respondent for his failure to file the required expense disclosure. After allowing for the mandated 30 days for Respondent to appeal the Notification of Violation to the COE, on December 5, 2015 Mr. Bonlarron issued a "Notification of Suspension," officially suspending Respondent from lobbying the county, or any of the 35 Palm Beach County municipalities that have adopted the PBC Lobbyist Registration Ordinance.

- **Documents received from Legislative Affairs and submitted to the investigative file**

1. Copy of sworn Complaint from Todd Bonlarron, Director of Legislative Affairs. (1 page)

¹ West Palm Beach, Palm Beach Gardens, and Riviera Beach have their own lobbyist registration procedure, which is permitted under the ordinance.

2. Copy of email notifications to file required lobbyist expenditure reports made to lobbyists, including Respondent Paul Martin, Jr., by Legislative/Public Affairs staff on September 21, 2015, October 19, 2015, and October 30, 2015. (9 pages)
 3. Copy of Notification of Violation dated November 6, 2015, issued to Respondent by Todd Bonlarron. (1 page)
 4. Copy of Notice of Suspension dated December 5, 2015, issued to Respondent by Todd Bonlarron. (1 page)
 5. Copy of letter dated November 6, 2015 to COE Executive Director from Todd Bonlarron, advising of the violation by Respondent. (1 page)
- **Applicable law**

The following sections of the PBC Commission on Ethics ordinance are relevant:

Section 2-254. Creation and jurisdiction.

The Palm Beach County Commission on Ethics (hereinafter "commission on ethics") is hereby established. The jurisdiction of the commission on ethics shall extend to any person required to comply with the countywide code of ethics, ***the lobbyist registration ordinance***... (Emphasis added)

Sec. 2-258. Powers and duties.

- (a) The commission on ethics shall be authorized to exercise such powers and shall be required to perform such duties as are hereinafter provided. The commission on ethics shall be empowered to review, interpret, render advisory opinions and enforce the:
 - (3) ***County lobbying Registration Ordinance***. (Emphasis added)

The following sections of the PBC Lobbyist Registration Ordinance are relevant to this inquiry:

Section 2-352. Definitions.

Central Lobbyist Registration Site will mean the official location for countywide lobbyist registration.

Lobbyist shall mean any person who is employed and receives payment, or who contracts for economic consideration, for the purpose of lobbying on behalf of a principal, and shall include an employee whose principal responsibility to the employer is overseeing the employer's various relationships with government or representing the employer in its contacts with government.

Palm Beach County Commission on Ethics means the commission established in section 2-254 et seq. to administer and enforce the ethics regulations set forth herein, and may also be referred to as the "commission on ethics" in this article.

Persons and entities shall be defined to include all natural persons, firms, associations, joint ventures, partnerships, estates, trusts, business entities, syndicates, fiduciaries, corporations, and all other organizations.

Principal shall mean the person or entity a lobbyist represents, including a lobbyist's employer or client, for the purpose of lobbying.

Sec. 2-353. Registration and expenditures.

- (a) ***Registration required.*** Prior to lobbying, all lobbyists shall submit an original, fully executed registration form to county administration, which shall serve as the official location for countywide lobbyist registration and which shall be known as the "Central Lobbyist Registration Site." The registration may be submitted in paper or electronic form pursuant to countywide policies and procedures. Each lobbyist is required to submit a separate registration for each principal represented. A registration fee of twenty-five dollars (\$25.00) must be included with each registration form submitted. A registrant shall promptly send a written statement to county administration canceling the registration for a principal upon termination of the lobbyist's representation of that principal. This

statement shall be signed by the lobbyist. Lobbying prior to registration is prohibited. It is the responsibility of the lobbyist to keep all information contained in the registration form current and up to date.

- (d) **Reporting of expenditures.** Commencing November 1, 2011, and by November 1 of each year thereafter, all lobbyists shall submit to the Central Lobbyist Registration Site a signed statement under oath listing all expenditures made by the lobbyist in lobbying county or municipal officials and employees in excess of twenty-five dollars (\$25) for the preceding fiscal year commencing on October 1 and ending on September 30. **A statement shall be filed even if there have been no expenditures during the reporting period...** (Emphasis added)

- (1) The county administrator of the Central Lobbyist Registration Site shall provide notice of violation to any lobbyist who fails to timely file an expenditure report and shall also notify the county commission on ethics of this failure. In addition to any other penalties which may be imposed under this article, **any lobbyist who fails to file the required expenditure report within thirty (30) days of the date of notice of violation shall be suspended from lobbying unless the notice of violation has been appealed to the commission on ethics.** (Emphasis added)

Sec. 2-356. Enforcement.

- (a) If the county administrator or municipal administrator as applicable is informed of any person who has failed to comply with the requirements of this article, he or she shall conduct a preliminary investigation as deemed necessary under the circumstances. In the event the county administrator or municipal administrator as applicable determines that a violation may have occurred based on the results of the investigation, the county administrator or municipal administrator as applicable shall forward the matter to the county commission on ethics for further investigation and enforcement proceeding as set forth in article XIII of this chapter, the countywide code of ethics. **For the purposes of further investigation and enforcement by the commission on ethics, a complaint submitted under this subsection by the county administrator or municipal administrator shall be deemed legally sufficient.** (Emphasis added)
- (e) The commission on ethics may process any other legally sufficient complaints of violations under this article pursuant to the procedures established in article XIII of this chapter.²

Sec. 2-357. Penalties.

Violations of this article shall be punishable as follows:

- (6) The penalties provided in this section shall be exclusive penalties imposed for any violation of the registration, contact log, and cone of silence requirements of this article. **Willful and knowing violations of this article shall be referred by the commission on ethics to the state attorney for prosecution in the same manner as a first degree misdemeanor pursuant to Florida Statutes, §125.69.** Failure or refusal of any lobbyist to comply with any order of the commission on ethics shall be punishable as provided by law, and shall otherwise be subject to such civil remedies as the county or municipality as applicable may pursue, including injunctive relief. (Emphasis added)

- **Analysis**

This sworn Complaint was filed by Todd Bonlarron, who is the PBC Director of Legislative Affairs, and also the county administrator for the Central Lobbyist Registration site (CLRS) as contemplated in §2-553(a)(1), *Reporting of expenditures*, and §2-554, *Enforcement*, of the PBC Lobbyist Registration Ordinance. As the administrator of the CLRS, any sworn complaint submitted by him to the COE for violation of any section of the Lobbyist Registration Ordinance is deemed to be **LEGALLY SUFFICIENT** pursuant to §2-356 of that ordinance. Based on the ordinance as

² While the Ordinance gives the COE authority to sanction individuals for certain violations of the lobbyist registration ordinance (i.e., failure to properly register-\$250 per day, failure to provide contact information-\$250 per violation, and "cone of silence" violations-\$250 per violation), it does not allow sanctions beyond suspension of lobbyist registration for failure to report lobbying expenditures.

written, each registered lobbyist must file an annual report of lobbying expenditures for each Principal they represent by November 1st of each year. The ordinance further requires under Section 2-353(d), that where no lobbying expenditures are made, the lobbyist must file a statement to that affect by November 1st of each year. Respondent is a registered lobbyist within the CLRS for the 35 municipalities that have adopted the ordinance. On April 20, 2015, Respondent registered to conduct paid lobbying activities on behalf of Capital Solutions Plus, Inc., and this registration remained active until it was suspended by Mr. Bonlarron in December 2015.

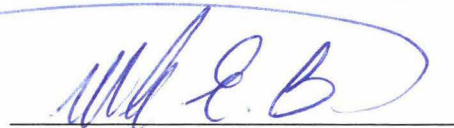
During September and October of 2015, county staff from Public Affairs and Legislative Affairs sent three emails, and made one telephone call to Respondent at the email addresses and telephone number he provided attempting to obtain Respondent's expenditure reports prior to the deadline on November 1st. On November 6, 2015, Respondent was sent a Notification of Violation of the lobbying expenditure reporting requirements under the ordinance. On this same date, a sworn complaint was filed with the COE for the violation.

Pursuant to the ordinance, Respondent had 30 days from the date of the notification of violation to appeal the proposed suspension of lobbying activities. On December 5, 2015, Mr. Bonlarron issued a Notification of Suspension to Respondent advising that he was suspended from all lobbying activity within Palm Beach County effective immediately. Respondent has not filed the required expenditure report as of this date, February 29, 2016, nor did he appeal the suspension within 30 days of the Notification of Suspension.

- **Recommendation**

Based on the information provided in the sworn complaint, I recommend the Commission of Ethics issue an Order affirming the suspension of Respondent from all lobbying activities in Palm Beach County as completed by Todd Bonlarron in his authority as county administrator of the Central Lobbyist Registration Site. Further, I recommend the order acknowledge that Respondent's 30-day time period to appeal such suspension to the Commission on Ethics under the ordinance expired as of December 1, 2015 with no appeal being filed. Lastly, I recommend that Respondent is found to have violated the Lobbyist Registration Ordinance willfully and knowingly.

Submitted by:



Mark E. Bannon., Executive Director



Date

PALM BEACH COUNTY COMMISSION ON ETHICS

MEMORANDUM

To: File
From: Gina A. Levesque, Intake and Compliance Manager
Re: C15-025 – Paul Martin, Jr., Lobbyist, Capital Solutions Plus, Inc.

Prior to the above-referenced case being heard in executive session by the commission, I attempted to make contact with the Respondent to provide notice of the hearing. When I called the telephone number listed on the Respondent's application, I received a recording that the number was disconnected.

At that time, I attempted to locate the Respondent by searching the internet. One website named The Christina & Paul Foundation (Foundation) listed the same contact information for Paul Martin as Respondent's application. Additional information on the website let me to contact information for Thomas M. Sullivan, as the Representative Office Manager for the Foundation.

I called the telephone number listed for Mr. Sullivan and left a voicemail on February 29, 2016 and received a return call approximately 30 minutes later. Mr. Sullivan said that while it is true that he used to be an employee of the Respondent, he no longer worked for him and had not done so for quite a while. When I asked if he had any contact information for him, he said that he hadn't spoken with the Respondent for years, but that he heard that the Respondent passed away approximately a year ago. He went on to say that Respondent sold his home in New York and was living in Palm Beach on a full-time basis.

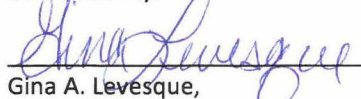
I continued to search the internet and found another reference about Respondent as a mortgage broker in Zillow. The listing titled Paul J. Martin Jr P.A. contained a photograph of the Respondent and listed him as a Real Estate Professional with 26 years experience. A review that someone placed with the screen name of "simhuggins7" said that the Respondent helped him rent a condo home in Palm Beach, FL and that he would highly recommend Respondent as a broker. Since the review was placed on February 7, 2014, I clicked on the screen name, which opened an email link to contact the reviewer. I sent the email on March 1, 2016 at approximately 2:00 pm and requested a return call to ask for information regarding Respondent.

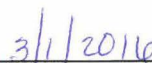
Approximately 2:30 pm, Mr. Sim Huggins called and said he knew Mr. Martin and that he passed away in July 2015. He said he didn't have contact information, but that the Respondent's girlfriend still works at Scott Gordon Realty in Palm Beach and that she could provide information that would confirm Respondent's death. Mr. Huggins said that Respondent's girlfriend's name is Becky. He also advised that Respondent lived in an apartment on "the island" and that he had a massive heart attack one day and died. When asked, Mr. Huggins said Respondent was approximately 73 years old. He went on to say that Scott Gordon also knew the Respondent and could verify his death.

Prior to contacting Becky or Scott Gordon, I searched the county website for the Medical Examiner's office to determine if I could confirm the Respondent's death without having to speak with his girlfriend or Mr. Gordon. The Medical Examiner's website contains a database search to find individuals by name and/or date of death. I entered the Respondent's name and found two listings. Based on information from website postings, the listings were immediately narrowed to one. I contacted the Medical Examiner's Office to determine if the person listed on the website with case number 150762 and date of death 06/12/2015 was Respondent.

The following information was confirmed by the Medical Examiner's Office: Case Number 150762 is for decedent Paul J. Martin, Jr., age on date of death was 73. Deceased lived in a residence on Ocean Drive, Lantana, which is considered to be part of "the island". I believe sufficient information has been provided to verify Respondent is deceased.

Submitted by:


Gina A. Levesque,
Intake and Compliance Manager


Date

SUPPLEMENTAL REPORT OF INVESTIGATION

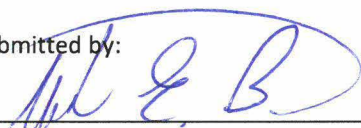
To: Palm Beach County Commission on Ethics
From: Mark E. Bannon, Executive Director
Re: C15-025 – Paul Martin, Jr., Lobbyist, Capital Solutions Plus, Inc.

On November 6, 2015, COE staff received a signed and sworn Complaint also dated November 6, 2015, from Todd Bonlarron, Director of PBC Legislative Affairs. After further investigation by COE staff, it was discovered and verified that Respondent is deceased.

- **Recommendation**

Based on the information that Respondent is deceased, I recommend that this matter be administratively dismissed pursuant to Rule of Procedure 4.2(d). While the sworn complaint is legally sufficient, it can no longer be pursued under the circumstances.

Submitted by:



Mark E. Bannon, Executive Director



Date