



Agenda

October 2, 2014 – 1:30 pm
Governmental Center,
301 North Olive Avenue, 6th Floor
Commissioners Chambers

Palm Beach County

Commission on Ethics

300 North Dixie Highway
West Palm Beach, FL 33401
561.355.1915
FAX: 561.355.1904
Hotline: 877.766.5920

E-mail:

ethics@palmbeachcountyethics.com

Commissioners

Salesia V. Smith-Gordon, Chair

Michael S. Kridel, Vice Chair

Michael F. Loffredo

Carmine A. Priore

Clevis Headley

Executive Director

Steven P. Cullen

Intake Manager

Gina A. Levesque

Staff Counsel

Christie E. Kelley

Senior Investigator

Mark E. Bannon

Investigator

Anthony C. Bennett

- I. Call to Order
- II. Roll Call
- III. Introductory Remarks
- IV. Approval of Minutes from September 4, 2014
- V. Probable Cause Hearing (to be heard in Public Session)
 - a. C14-009
- VI. Proposed Advisory Opinions
 - a. RQO 14-026
 - b. RQO 14-027
 - c. RQO 14-028
- VII. Discussion re: Workshop
- VIII. Executive Director Comments
- IX. Commission Comments
- X. Public Comments
- XI. Adjournment

If a person decides to appeal any decision made by this Commission with respect to any matter considered at this meeting or hearing, (s)he will need a record of the proceedings, and that, for such purpose, (s)he may need to ensure that a verbatim record of the proceedings is made, which record includes the testimony and evidence upon which the appeal is to be based.

**OFFICIAL MEETING MINUTES
OF THE
PALM BEACH COUNTY COMMISSION ON ETHICS
PALM BEACH COUNTY, FLORIDA**

SEPTEMBER 4, 2014

**THURSDAY
1:30 P.M.**

**COMMISSION CHAMBERS
GOVERNMENTAL CENTER**

- I. CALL TO ORDER**
- II. ROLL CALL**

MEMBERS:

Salesia V. Smith-Gordon, Chair – Absent
Michael S. Kridel, Vice Chair
Clevis Headley
Michael F. Loffredo
Carmine A. Priore – Attended by telephone

STAFF:

Mark E. Bannon, Commission on Ethics (COE) Senior Investigator
Anthony C. Bennett, COE Investigator
Steven P. Cullen, COE Executive Director
Christie E. Kelley, COE Staff Counsel
Gina A. Levesque, COE Intake Manager

ADMINISTRATIVE STAFF:

Julie Burns, Deputy Clerk, Clerk & Comptroller's Office
Barbara Strickland, Deputy Clerk, Clerk & Comptroller's Office

- III. INTRODUCTORY REMARKS – None**

IV. APPROVAL OF MINUTES FROM AUGUST 7, 2014

MOTION to approve the August 7, 2014, minutes. Motion by Carmine Priore, seconded by Clevis Headley, and carried 4-0. Salesia Smith-Gordon absent.

V. PROCESSED ADVISORY OPINIONS (CONSENT AGENDA)

V.a. Request for Opinion (RQO) 14-022

Staff Counsel Christie Kelley said that:

- The City of Delray Beach (Delray) attorney asked whether Commissioner Al Jacquet could provide legal services in his personal capacity to someone who previously owned a Delray restaurant.
- The individual did not currently own a Delray restaurant or have any pending contracts, agreements, or applications with Delray.
- Staff submitted that:
 - Commissioner Jacquet was not prohibited from providing legal services in his personal capacity to the individual.
 - The Code of Ethics (Code) prohibited Commissioner Jacquet from using his official position to give a special financial benefit not shared with similarly situated members of the general public to a customer or client of his outside business, or to corruptly secure a special financial benefit for others.
 - If a matter before the Delray commission resulted in a special financial benefit to a customer or client of Commissioner Jacquet's outside business, he must disclose the conflict's nature, abstain from voting and participating in the matter, and complete a Conflict of Interest Form 8B.
 - The individual would be considered Commissioner Jacquet's customer or client if the commissioner's outside business supplied him with over \$10,000 in goods or services during the previous 24 months.

V.a. – CONTINUED

MOTION to approve processed advisory opinion letter RQO 14-022. Motion by Carmine Priore, seconded by Clevis Headley, and carried 4-0. Salesia Smith-Gordon absent.

V.b. RQO 14-023

Ms. Kelley said that:

- Delray’s attorney asked whether Deputy Vice-Mayor Jordana Jarjura could participate in a Delray commission workshop involving the All Aboard Florida (AAF) project.
- Deputy Vice-Mayor Jarjura’s client, Lauderdale Marine Center (LMC), would be financially impacted by AAF, and she asked whether she could vote on its formal resolution.
- Staff submitted that:
 - Deputy Vice-Mayor Jarjura could not participate in the workshop or vote on AAF’s formal resolution.
 - Under the Code, she needed to publicly disclose the conflict’s nature before the item was discussed by the Delray commission, abstain from participating and voting on the matter, and complete Conflict of Interest Form 8B.
 - The Code prohibited Deputy Vice-Mayor Jarjura from using her official position to give a special financial benefit not shared with similarly situated members of the general public to a customer or client of her outside business or to corruptly secure a special financial benefit for others.

V.b. – CONTINUED

- Deputy Vice-Mayor Jarjura supplied LMC with over \$10,000 in services during the previous 24 months; therefore, it was considered a customer or client of her outside employer or business.
- Deputy Vice-Mayor Jarjura was aware of the COE's determination before today's scheduled Delray commission workshop.

MOTION to approve processed advisory opinion letter RQO 14-023. Motion by Michael Loffredo, seconded by Clevis Headley, and carried 4-0. Salesia Smith-Gordon absent.

V.c. RQO 14-024

Ms. Kelley said that:

- The City of Boynton Beach (Boynton Beach) Human Resources and Risk Management director asked whether volunteers of the Links at Boynton Beach Golf Course could receive special privileges or perks.
- Staff submitted that:
 - Boynton Beach volunteers were not prohibited from receiving a benefit.
 - Under the Code, municipal volunteers were defined as employees; therefore, the golf course volunteers were required to comply with the gift law.
 - If the volunteers' privileges or perks exceeded \$100 in the aggregate, they were reportable in an annual gift-disclosure report filed with the COE.

MOTION to approve processed advisory opinion letter RQO 14-024. Motion by Clevis Headley, seconded by Michael Loffredo, and carried 4-0. Salesia Smith-Gordon absent.

V. – CONTINUED

V.d. RQO 14-025

Ms. Kelley said that:

- A Town of Palm Beach employee was also a member of the Palm Beach Economic Crime Unit Board, a not-for-profit charitable organization.
- The employee asked whether she was required to complete an annual gift disclosure report for a golf foursome package that was being donated as a raffle prize for the organization's fund-raising golf tournament.
- Staff submitted that:
 - The donation to the organization fell within the Code's charitable solicitation section.
 - The employee was not required to complete an annual gift disclosure report for the donation, but she must maintain and submit a solicitation log to the COE.
 - The log must contain the organization's name, the event for which funds were being solicited, the names of persons or entities that were contacted, and the amount of funds solicited.
 - The solicitation log must be filed with the COE within 30 days after the event or within 30 days of the solicitation if it was not related to the event.

MOTION to approve processed advisory opinion letter RQO 14-025. Motion by Clevis Headley, seconded by Michael Loffredo, and carried 4-0. Salesia Smith-Gordon absent.

VI. ITEMS PULLED FROM CONSENT AGENDA – None

VII. DISCUSSION RE: WORKSHOP

Steven Cullen, Commission on Ethics (COE) Executive Director, said that:

- The COE workshop was scheduled for October 24, 2014, at 10:00 a.m. at the Vista Center.
- An agenda was being prepared, and any suggestions or changes could be made today or at the October 2, 2014, meeting.
- Staff suggested that the workshop discussion include education, training, and any proposed changes to the COE's by-laws and the Code, including the recurrent issue of a separate trial function.
 - Staff was drafting language to include the COE's Rules of Procedure in its by-laws.
 - Questions previously arose regarding what Robert's Rules of Order (Robert) language should apply to the COE's Rules of Procedure.
 - The Board of County Commissioners' Rules of Procedure contained Robert-based rules.

Commissioner Michael Kridel suggested that each COE member provide staff with agenda input before the October 2, 2014, meeting.

VIII. EXECUTIVE DIRECTOR COMMENTS

VIII.a.

DISCUSSED: Channel 20 Programming.

Mr. Cullen said that he participated in two Politically Speaking television shows produced by Legislative Affairs Director Todd Bonlarron and Channel 20. He added that the COE's Web site contained links to the programs.

VIII. – CONTINUED

VIII.b.

DISCUSSED: Ethics Training and Retraining.

Mr. Cullen commented that:

- Many municipalities under the COE's jurisdiction were undergoing ethics retraining.
- The COE's online video training was widely used.
- The County recently updated its policy and procedures manual to establish a universal date and grace period for training, and some municipalities were following a similar procedure.

VIII.c.

DISCUSSED: Community Outreach.

Mr. Cullen stated that next week he would speak to the Leadership Palm Beach County members about COE operations, and that several other community presentations were scheduled.

VIII.d.

DISCUSSED: Ethics Summit.

Mr. Cullen said that:

- At the August 8, 2014, Ethics Summit planning meeting, a suggestion was made to draft a document containing minimum standards for local ethics commissions.
- The COE executive director for the City of Jacksonville agreed to lead in drafting the document's language.
- Senator Joseph Abruzzo would use the draft document to continue planning for the Ethics Summit.

VIII. – CONTINUED

VIII.e.

DISCUSSED: Advisory Opinion Summaries.

Mr. Cullen stated that the opinion summary project was completed, and that the Web site now contained a legal headnote summary for each advisory opinion.

IX. COMMISSION COMMENTS – None

X. PUBLIC COMMENTS – None

XI. ADJOURNMENT

MOTION to adjourn the meeting. Motion by Clevis Headley, seconded by Michael Loffredo, and carried 4-0. Salesia Smith-Gordon absent.

At 1:49 p.m., the vice chair declared the meeting adjourned.

APPROVED:

Chair/Vice Chair



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: AIEX AUGUSTIN E-Mail J.ALEXAUGUSTIN@LAWYER.COM
Address: 401 NORTH ROSEMARY
City: WEST PALM BEACH Zip: 33401
Home #: 561-299-8495 Work #: _____ Cell #: _____

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

Please provide as much information as possible.

Name: KEITH JAMES E-Mail KJAMES@WPB.ORG
Address: 401 CLEMATIS
City: WEST PALM BEACH FLORIDA Zip: 33401
Home #: 561-822-1390 Work #: _____ Cell #: _____
Title/Office Held or Sought: COMMISSIONER WEST PALM BEACH FLORIDA

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

Allegation is against person in
County/Municipal Government

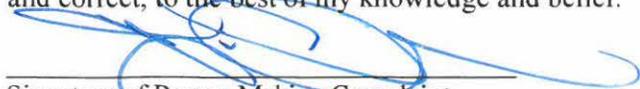
Allegation is about County:
Whistleblower Retaliation

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.



Signature of Person Making Complaint

STATE OF FLORIDA

COUNTY OF _____

Sworn to (or affirmed) and subscribed before me
this 15 day of September, 2014, by

(Name of Person Making Statement)
who is personally known to me ____ or produced
identification . Type of identification
produced:

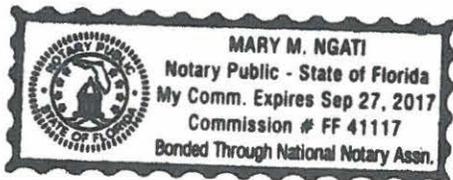
FL DL # A223-461-72-098



(Signature of Notary Public, State of Florida)

MARY NGATI

(Print, Type, or Stamp Commission Expires Date of Notary Public)



September 14, 2014

Palm Beach County Commission on Ethics
300 N. Dixie Hwy.
Suite 450
West Palm Beach, FL 33401

To whom it may concern:

This letter, along with supporting documentation, will serve as a formal ethics complaint on West Palm Beach City Commissioner Keith James.

As is well known in the community, Commissioner James has a long-standing relationship with Redemptive Life Fellowship, Inc., located at 2101 Australian Avenue in West Palm Beach, FL 33407.

In 2011, it became public knowledge that the City of West Palm Beach had many concerns regarding its contribution to one of its CHDO's, Redemptive Life Fellowship for homes that were built in the Coleman Park neighborhood in the City's north end.

When all of this came to light, Commissioner James was a sitting City Commissioner. Commissioner James was also the Registered Agent with the Florida Department of Corporations, and has been as far back as 1995 (the website's information only went back to 1995). At no time that this complainant is aware did Commissioner James ever make a statement to that effect.

However, on September 2, 2014, as a result of a letter written by City Administration to HUD regarding HUD's request for settlement, the issue was raised during formal City Commission meeting.

Further, after a lengthy discussion regarding this matter, a motion was made by Commissioner Kimberly Mitchell and received a second by Commissioner Shanon Materio, directing the Mayor and staff NOT to move forward with their original plan to ask HUD to consider not making these grants available to the City for the next few years in the amount of roughly \$1.4 million in lieu of the fine.

This motion passed 4-1, with Commissioner Keith James voting "nay." This complainant believes the code of ethics required Commissioner James to declare and/or abstain from voting. He did neither.

The full discussion can be viewed by the Commission on Ethics on the City's website roughly beginning at Minute 32:00.

The formal vote can be viewed by this Commission on Ethics on the City's website, during the September 2, 2014 meeting at beginning at Minute 54:00.

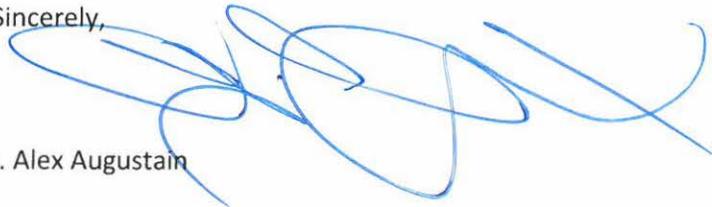
Further, in an interview with Palm Beach Post reporter, Elliot Kleinberg, the following Monday, Commissioner James actually stated that would have been required of him had there been a formal vote. He indicated there had not been a formal vote, which was not the case.

The full interview can be heard on the Palm Beach Post's website, as part of an article published on Sept 10, 2014 (article is attached).

In closing, it is this complainant's belief further examination of Commissioner Keith James' actions is required and necessary. Since the meeting on September 2, 2014, as well as the interview on September 9, 2014, and the subsequent Palm Beach Post article on September 10, 2014, someone has amended the Division of Corporation's annual report (2014). Remarkably, Commissioner James has been removed as the Registered Agent, and replaced by Steve Chin.

Please feel free to contact me if you have any further questions.

Sincerely,



J. Alex Augustain

Enclosures:

Palm Beach County Commission on Ethics Complaint Form
1995-2014 Annual Report as found on Sunbiz from the Department of State, Division of Corporations
Amended 2014 Annual Report as found on Sunbiz from the Department of State, Div. of Corporations
Palm Beach Post editorial, dated September 8, 2014
Palm Beach Post article, dated September 10, 2014
Letter from City of West Palm Beach to Redemptive Life Fellowship, dated August 2, 2011
List of payments requested by the City of West Palm Beach as part of the Monitoring Corrective Action Plan, dated August 2, 2011

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10:25 AM

📶 52% 🔋

search.sunbiz.org 

2014 FLORIDA NON PROFIT CORPORATION ANNUAL REPORT

DOCUMENT# N44788

Entity Name: REDEMPTIVE LIFE FELLOWSHIP, INC.

Current Principal Place of Business:

2101 AUSTRALIAN AVE.
WEST PALM BEACH, FL 33407

Current Mailing Address:

2101 AUSTRALIAN AVE.
WEST PALM BEACH, FL 33407 US

FEI Number: 65-0286937

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

JAMES, KEITH A.
4510 PORTOFINO WAY
SUITE 209
WEST PALM BEACH FL 33409 US

FILED
May 01, 2014
Secretary of State
CC9928595257

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE:

Electronic Signature of Registered Agent

Date

Officer/Director Detail :

Title: D
Name: RAY, HAROLD CALVIN
Address: 11771 LITTLESTONE CT
City-State-Zip: W. PALM BEACH FL

Title: D
Name: RAY, BRENDA J.
Address: 11771 LITTLESTONE CT
City-State-Zip: W. PALM BEACH FL

Title: D
Name: MOORE, WILLIE
Address: 391 W. 36TH ST.
City-State-Zip: RIVIERA BCH FL 33404

Title: D
Name: GAINES, BARBARA
Address: 380 W. 32ND ST.
City-State-Zip: RIVIERA BCH FL 33404

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath, that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: HAROLD RAY

D

05/01/2014

2014 FLORIDA NON PROFIT CORPORATION ANNUAL REPORT

DOCUMENT# N96000005489

Entity Name: KINGDOM DOMINION NETWORK, INC.

Current Principal Place of Business:

2101 AUSTRALIAN AVE
WEST PALM BEACH, FL 33407

Current Mailing Address:

2101 AUSTRALIAN AVE
WEST PALM BEACH, FL 33407

FEI Number: 65-0703834

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

JAMES, KEITH A
4510 PORTOFINO WAY
SUITE 209
WEST PALM BEACH, FL 33409 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: _____
Electronic Signature of Registered Agent Date

Officer/Director Detail :

Title	D	Title	D
Name	RAY, BRENDA	Name	RAY, HAROLD C
Address	11771 LITTLESTONE CT	Address	11771 LITTLESTONE CT
City-State-Zip:	WEST PALM BEACH FL 33412	City-State-Zip:	WEST PALM BEACH FL 33412

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: HAROLD C RAY D 05/01/2014

Electronic Signature of Signing Officer/Director Detail Date

images.sunbiz.org



2009 NOT-FOR-PROFIT CORPORATION ANNUAL REPORT

FILED
Apr 30, 2014
Secretary c

DOCUMENT# N44788

Entity Name: REDEMPTIVE LIFE FELLOWSHIP, INC.

Current Principal Place of Business:

2101 AUSTRALIAN AVE.
WEST PALM BEACH, FL 33407 US

New Principal Place of Business:

Current Mailing Address:

2101 AUSTRALIAN AVE
WEST PALM BEACH, FL 33407 US

New Mailing Address:

FEI Number: 65-0286937

FEI Number Applied For ()

FEI Number Not Applicable ()

Certificate of Status De

Name and Address of Current Registered Agent:

JAMES, KEITH A.
4510 PORTOFINO WAY
SUITE 209
WEST PALM BEACH, FL 33409 US

Name and Address of New Registered Agent:

The above named entity submits this statement for the purpose of changing its registered office or registered agent in the State of Florida.

SIGNATURE: _____

Electronic Signature of Registered Agent

Date

OFFICERS AND DIRECTORS:

Title: D () Delete
Name: BEAN, JAMES
Address: 425 N.E. 14TH AVENUE
City-St-Zip: BOYNTON BEACH, FL

Title: D () Delete
Name: RAY, HAROLD CALVIN
Address: 11771 LITTLESTONE CT
City-St-Zip: W. PALM BEACH, FL

Title: D () Delete
Name: RAY, BRENDA J.
Address: 11771 LITTLESTONE CT
City-St-Zip: W. PALM BEACH, FL

Title: D () Delete
Name: SIMPSON, FERMAL
Address: 6051 ADAMS STREET
City-St-Zip: P. BCH. GARDENS, FL

Title: D () Delete
Name: MOORE, WILLIE

ADDITIONS/CHANGES TO OFFICERS AND

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: () Change () Addition
Name:

2014 FLORIDA NON PROFIT CORPORATION AMENDED ANNUAL REPORT

DOCUMENT# N44788

Entity Name: REDEMPTIVE LIFE FELLOWSHIP, INC.

Current Principal Place of Business:

2101 AUSTRALIAN AVE.
WEST PALM BEACH, FL 33407

Current Mailing Address:

2101 AUSTRALIAN AVE.
WEST PALM BEACH, FL 33407 US

FEI Number: 65-0286937

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

CHIN, STEVE
2101 AUSTRALIAN AVE.
WEST PALM BEACH, FL 33407 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: STEVE CHIN 09/12/2014

Electronic Signature of Registered Agent Date

Officer/Director Detail :

Title D
Name RAY, HAROLD CALVIN
Address 11771 LITTLESTONE CT
City-State-Zip: W. PALM BEACH FL

Title D
Name RAY, BRENDA J.
Address 11771 LITTLESTONE CT
City-State-Zip: W. PALM BEACH FL

Title D
Name MOORE, WILLIE
Address 391 W. 36TH ST.
City-State-Zip: RIVIERA BCH FL 33404

Title D
Name GAINES, BARBARA
Address 380 W. 32ND ST.
City-State-Zip: RIVIERA BCH FL 33404

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SIGNATURE: STEVE CHIN 09/12/2014

Electronic Signature of Signing Officer/Director Detail Date

2014 FLORIDA NON PROFIT CORPORATION ANNUAL REPORT

DOCUMENT# N44788

Entity Name: REDEMPTIVE LIFE FELLOWSHIP, INC.

Current Principal Place of Business:

2101 AUSTRALIAN AVE.
WEST PALM BEACH, FL 33407

Current Mailing Address:

2101 AUSTRALIAN AVE.
WEST PALM BEACH, FL 33407 US

FEI Number: 65-0286937

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

JAMES, KEITH A.
4510 PORTOFINO WAY
SUITE 209
WEST PALM BEACH, FL 33409 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: _____

Electronic Signature of Registered Agent

Date

Officer/Director Detail :

Title D
Name RAY, HAROLD CALVIN
Address 11771 LITTLESTONE CT
City-State-Zip: W. PALM BEACH FL

Title D
Name RAY, BRENDA J.
Address 11771 LITTLESTONE CT
City-State-Zip: W. PALM BEACH FL

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City-State-Zip: RIVIERA BCH FL 33404

Title D
Name GAINES, BARBARA
Address 380 W. 32ND ST.
City-State-Zip: RIVIERA BCH FL 33404

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SIGNATURE: HAROLD RAY

D

05/01/2014

Electronic Signature of Signing Officer/Director Detail

Date

2013 FLORIDA NON PROFIT CORPORATION ANNUAL REPORT

DOCUMENT# N44788

Entity Name: REDEMPTIVE LIFE FELLOWSHIP, INC.

Current Principal Place of Business:

2101 AUSTRALIAN AVE.
WEST PALM BEACH, FL 33407

Current Mailing Address:

2101 AUSTRALIAN AVE.
WEST PALM BEACH, FL 33407 US

FEI Number: 65-0286937

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

JAMES, KEITH A.
4510 PORTOFINO WAY
SUITE 209
WEST PALM BEACH, FL 33409 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: _____

Electronic Signature of Registered Agent

_____ Date

Officer/Director Detail :

Title D
Name RAY, HAROLD CALVIN
Address 11771 LITTLESTONE CT
City-State-Zip: W. PALM BEACH FL

Title D
Name RAY, BRENDA J.
Address 11771 LITTLESTONE CT
City-State-Zip: W. PALM BEACH FL

Title D
Name SIMPSON, FERMAL
Address 6051 ADAMS STREET
City-State-Zip: P. BCH. GARDENS FL

Title D
Name MOORE, WILLIE
Address 391 W. 36TH ST.
City-State-Zip: RIVIERA BCH FL 33404

Title D
Name GAINES, BARBARA
Address 380 W. 32ND ST.
City-State-Zip: RIVIERA BCH FL 33404

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SIGNATURE: HAROLD RAY

DIRECTOR

04/30/2013

Electronic Signature of Signing Officer/Director Detail

Date

2012 NOT-FOR-PROFIT CORPORATION ANNUAL REPORT

**FILED
Apr 30, 2012
Secretary of State**

DOCUMENT# N44788

Entity Name: REDEMPTIVE LIFE FELLOWSHIP, INC.

Current Principal Place of Business:

New Principal Place of Business:

2101 AUSTRALIAN AVE.
WEST PALM BEACH, FL 33407 US

Current Mailing Address:

New Mailing Address:

2101 AUSTRALIAN AVE
WEST PALM BEACH, FL 33407 US

2101 AUSTRALIAN AVE.
WEST PALM BEACH, FL 33407 US

FEI Number: 65-0286937 **FEI Number Applied For ()** **FEI Number Not Applicable ()** **Certificate of Status Desired ()**

Name and Address of Current Registered Agent:

Name and Address of New Registered Agent:

JAMES, KEITH A.
4510 PORTOFINO WAY
SUITE 209
WEST PALM BEACH, FL 33409 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: _____

Electronic Signature of Registered Agent

_____ Date

OFFICERS AND DIRECTORS:

Title: D
Name: RAY, HAROLD CALVIN
Address: 11771 LITTLESTONE CT
City-St-Zip: W. PALM BEACH, FL

Title: D
Name: RAY, BRENDA J.
Address: 11771 LITTLESTONE CT
City-St-Zip: W. PALM BEACH, FL

Title: D
Name: SIMPSON, FERMAL
Address: 6051 ADAMS STREET
City-St-Zip: P. BCH. GARDENS, FL

Title: D
Name: MOORE, WILLIE
Address: 391 W. 36TH ST.
City-St-Zip: RIVIERA BCH, FL 33404

Title: D
Name: GAINES, BARBARA
Address: 380 W. 32ND ST.
City-St-Zip: RIVIERA BCH, FL 33404

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: HAROLD RAY

D

04/30/2012

Electronic Signature of Signing Officer or Director

_____ Date

2011 NOT-FOR-PROFIT CORPORATION ANNUAL REPORT

**FILED
May 01, 2011
Secretary of State**

DOCUMENT# N44788

Entity Name: REDEMPTIVE LIFE FELLOWSHIP, INC.

Current Principal Place of Business:

New Principal Place of Business:

2101 AUSTRALIAN AVE.
WEST PALM BEACH, FL 33407 US

Current Mailing Address:

New Mailing Address:

2101 AUSTRALIAN AVE
WEST PALM BEACH, FL 33407 US

FEI Number: 65-0286937 **FEI Number Applied For ()** **FEI Number Not Applicable ()** **Certificate of Status Desired ()**

Name and Address of Current Registered Agent:

Name and Address of New Registered Agent:

JAMES, KEITH A.
4510 PORTOFINO WAY
SUITE 209
WEST PALM BEACH, FL 33409 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: _____

Electronic Signature of Registered Agent

_____ Date

OFFICERS AND DIRECTORS:

Title: D
Name: BEAN, JAMES
Address: 425 N.E. 14TH AVENUE
City-St-Zip: BOYNTON BEACH, FL

Title: D
Name: RAY, HAROLD CALVIN
Address: 11771 LITTLESTONE CT
City-St-Zip: W. PALM BEACH, FL

Title: D
Name: RAY, BRENDA J.
Address: 11771 LITTLESTONE CT
City-St-Zip: W. PALM BEACH, FL

Title: D
Name: SIMPSON, FERMAL
Address: 6051 ADAMS STREET
City-St-Zip: P. BCH. GARDENS, FL

Title: D
Name: MOORE, WILLIE
Address: 391 W. 36TH ST.
City-St-Zip: RIVIERA BCH, FL 33404

Title: D
Name: GAINES, BARBARA
Address: 380 W. 32ND ST.
City-St-Zip: RIVIERA BCH, FL 33404

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: HAROLD RAY

D

05/01/2011

_____ Electronic Signature of Signing Officer or Director

_____ Date

2010 NOT-FOR-PROFIT CORPORATION ANNUAL REPORT

**FILED
May 02, 2010
Secretary of State**

DOCUMENT# N44788

Entity Name: REDEMPTIVE LIFE FELLOWSHIP, INC.

Current Principal Place of Business:

New Principal Place of Business:

2101 AUSTRALIAN AVE.
WEST PALM BEACH, FL 33407 US

Current Mailing Address:

New Mailing Address:

2101 AUSTRALIAN AVE
WEST PALM BEACH, FL 33407 US

FEI Number: 65-0286937 **FEI Number Applied For ()** **FEI Number Not Applicable ()** **Certificate of Status Desired ()**
In accordance with s. 607.193(2)(b), F.S., the corporation did not receive the prior notice.

Name and Address of Current Registered Agent:

Name and Address of New Registered Agent:

JAMES, KEITH A.
4510 PORTOFINO WAY
SUITE 209
WEST PALM BEACH, FL 33409 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: _____

Electronic Signature of Registered Agent

_____ Date

OFFICERS AND DIRECTORS:

Title: D
Name: BEAN, JAMES
Address: 425 N.E. 14TH AVENUE
City-St-Zip: BOYNTON BEACH, FL

Title: D
Name: RAY, HAROLD CALVIN
Address: 11771 LITTLESTONE CT
City-St-Zip: W. PALM BEACH, FL

Title: D
Name: RAY, BRENDA J.
Address: 11771 LITTLESTONE CT
City-St-Zip: W. PALM BEACH, FL

Title: D
Name: SIMPSON, FERMAL
Address: 6051 ADAMS STREET
City-St-Zip: P. BCH. GARDENS, FL

Title: D
Name: MOORE, WILLIE
Address: 391 W. 36TH ST.
City-St-Zip: RIVIERA BCH, FL 33404

Title: D
Name: GAINES, BARBARA
Address: 380 W. 32ND ST.
City-St-Zip: RIVIERA BCH, FL 33404

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: HAROLD RAY

D

05/02/2010

_____ Electronic Signature of Signing Officer or Director

_____ Date

2009 NOT-FOR-PROFIT CORPORATION ANNUAL REPORT

**FILED
Apr 30, 2009
Secretary of State**

DOCUMENT# N44788

Entity Name: REDEMPTIVE LIFE FELLOWSHIP, INC.

Current Principal Place of Business:

New Principal Place of Business:

2101 AUSTRALIAN AVE.
WEST PALM BEACH, FL 33407 US

Current Mailing Address:

New Mailing Address:

2101 AUSTRALIAN AVE
WEST PALM BEACH, FL 33407 US

FEI Number: 65-0286937 FEI Number Applied For () FEI Number Not Applicable () Certificate of Status Desired ()

Name and Address of Current Registered Agent:

Name and Address of New Registered Agent:

JAMES, KEITH A.
4510 PORTOFINO WAY
SUITE 209
WEST PALM BEACH, FL 33409 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: _____
Electronic Signature of Registered Agent Date

OFFICERS AND DIRECTORS:

ADDITIONS/CHANGES TO OFFICERS AND DIRECTORS:

Title: D () Delete
Name: BEAN, JAMES
Address: 425 N.E. 14TH AVENUE
City-St-Zip: BOYNTON BEACH, FL

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: RAY, HAROLD CALVIN
Address: 11771 LITTLESTONE CT
City-St-Zip: W. PALM BEACH, FL

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: RAY, BRENDA J.
Address: 11771 LITTLESTONE CT
City-St-Zip: W. PALM BEACH, FL

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: SIMPSON, FERMAL
Address: 6051 ADAMS STREET
City-St-Zip: P. BCH. GARDENS, FL

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: MOORE, WILLIE
Address: 391 W. 36TH ST.
City-St-Zip: RIVIERA BCH, FL 33404

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: GAINES, BARBARA
Address: 380 W. 32ND ST.
City-St-Zip: RIVIERA BCH, FL 33404

Title: () Change () Addition
Name:
Address:
City-St-Zip:

I hereby certify that the information supplied with this filing does not qualify for the exemption stated in Chapter 119, Florida Statutes. I further certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with an address, with all other like empowered.

SIGNATURE: HAROLD RAY D 04/30/2009
Electronic Signature of Signing Officer or Director Date

2008 NOT-FOR-PROFIT CORPORATION ANNUAL REPORT

**FILED
Apr 30, 2008
Secretary of State**

DOCUMENT# N44788

Entity Name: REDEMPTIVE LIFE FELLOWSHIP, INC.

Current Principal Place of Business:

2101 AUSTRALIAN AVE.
WEST PALM BEACH, FL 33407 US

New Principal Place of Business:

Current Mailing Address:

2101 AUSTRALIAN AVE
WEST PALM BEACH, FL 33407 US

New Mailing Address:

FEI Number: 65-0286937 FEI Number Applied For () FEI Number Not Applicable () Certificate of Status Desired (X)

Name and Address of Current Registered Agent:

Name and Address of New Registered Agent:

JAMES, KEITH A.
4510 PORTOFINO WAY
SUITE 209
WEST PALM BEACH, FL 33409 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: _____

Electronic Signature of Registered Agent

_____ Date

OFFICERS AND DIRECTORS:

ADDITIONS/CHANGES TO OFFICERS AND DIRECTORS:

Title: D () Delete
Name: BEAN, JAMES,
Address: 425 N.E. 14TH AVENUE
City-St-Zip: BOYNTON BEACH, FL

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: RAY, HAROLD CALVIN,
Address: 11771 LITTLESTONE CT
City-St-Zip: W. PALM BEACH, FL

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: RAY, BRENDA J.,
Address: 11771 LITTLESTONE CT
City-St-Zip: W. PALM BEACH, FL

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: SIMPSON, FERMAL,
Address: 6051 ADAMS STREET
City-St-Zip: P. BCH. GARDENS, FL

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: MOORE, WILLIE
Address: 391 W. 36TH ST.
City-St-Zip: RIVIERA BCH, FL 33404

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: GAINES, BARBARA
Address: 380 W. 32ND ST.
City-St-Zip: RIVIERA BCH, FL 33404

Title: () Change () Addition
Name:
Address:
City-St-Zip:

I hereby certify that the information supplied with this filing does not qualify for the exemption stated in Chapter 119, Florida Statutes. I further certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with an address, with all other like empowered.

SIGNATURE: HAROLD RAY

D

04/30/2008

Electronic Signature of Signing Officer or Director

_____ Date

2007 NOT-FOR-PROFIT CORPORATION ANNUAL REPORT

**FILED
Apr 30, 2007
Secretary of State**

DOCUMENT# N44788

Entity Name: REDEMPTIVE LIFE FELLOWSHIP, INC.

Current Principal Place of Business:

2101 AUSTRALIAN AVE.
WEST PALM BEACH, FL 33407 US

New Principal Place of Business:

Current Mailing Address:

2101 AUSTRALIAN AVE
WEST PALM BEACH, FL 33407 US

New Mailing Address:

FEI Number: 65-0286937 **FEI Number Applied For ()** **FEI Number Not Applicable ()** **Certificate of Status Desired ()**

Name and Address of Current Registered Agent:

JAMES, KEITH A.
1655 PALM BEACH LAKES BLVD
SUITE 810, TOWER C
WEST PALM BEACH, FL 33401 US

Name and Address of New Registered Agent:

JAMES, KEITH A.
4510 PORTOFINO WAY
SUITE 209
WEST PALM BEACH, FL 33409 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: KEITH JAMES

04/30/2007

Electronic Signature of Registered Agent

Date

OFFICERS AND DIRECTORS:

Title: D () Delete
Name: BEAN, JAMES,
Address: 425 N.E. 14TH AVENUE
City-St-Zip: BOYNTON BEACH, FL

Title: D () Delete
Name: RAY, HAROLD CALVIN,
Address: 11771 LITTLESTONE CT
City-St-Zip: W. PALM BEACH, FL

Title: D () Delete
Name: RAY, BRENDA J.,
Address: 11771 LITTLESTONE CT
City-St-Zip: W. PALM BEACH, FL

Title: D () Delete
Name: SIMPSON, FERMAL,
Address: 6051 ADAMS STREET
City-St-Zip: P. BCH. GARDENS, FL

Title: D () Delete
Name: MOORE, WILLIE
Address: 391 W. 36TH ST.
City-St-Zip: RIVIERA BCH, FL 33404

Title: D () Delete
Name: GAINES, BARBARA
Address: 380 W. 32ND ST.
City-St-Zip: RIVIERA BCH, FL 33404

ADDITIONS/CHANGES TO OFFICERS AND DIRECTORS:

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: () Change () Addition
Name:
Address:
City-St-Zip:

I hereby certify that the information supplied with this filing does not qualify for the exemption stated in Chapter 119, Florida Statutes. I further certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with an address, with all other like empowered.

SIGNATURE: HAROLD RAY

D

04/30/2007

Electronic Signature of Signing Officer or Director

Date

2006 NOT-FOR-PROFIT CORPORATION ANNUAL REPORT

**FILED
May 01, 2006
Secretary of State**

DOCUMENT# N44788

Entity Name: REDEMPTIVE LIFE FELLOWSHIP, INC.

Current Principal Place of Business:

New Principal Place of Business:

2101 AUSTRALIAN AVE.
WEST PALM BEACH, FL 33407 US

Current Mailing Address:

New Mailing Address:

2101 AUSTRALIAN AVE
WEST PALM BEACH, FL 33407 US

FEI Number: 65-0286937 FEI Number Applied For () FEI Number Not Applicable () Certificate of Status Desired ()
In accordance with s. 607.193(2)(b), F.S., the corporation did not receive the prior notice.

Name and Address of Current Registered Agent:

Name and Address of New Registered Agent:

JAMES, KEITH A.
1655 PALM BEACH LAKES BLVD
SUITE 810, TOWER C
WEST PALM BEACH, FL 33401 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: _____

Electronic Signature of Registered Agent

_____ Date

OFFICERS AND DIRECTORS:

ADDITIONS/CHANGES TO OFFICERS AND DIRECTORS:

Title: D () Delete
Name: BEAN, JAMES,
Address: 425 N.E. 14TH AVENUE
City-St-Zip: BOYNTON BEACH, FL

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: RAY, HAROLD CALVIN,
Address: 11771 LITTLESTONE CT
City-St-Zip: W. PALM BEACH, FL

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: RAY, BRENDA J.,
Address: 11771 LITTLESTONE CT
City-St-Zip: W. PALM BEACH, FL

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: SIMPSON, FERMAL,
Address: 6051 ADAMS STREET
City-St-Zip: P. BCH. GARDENS, FL

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: MOORE, WILLIE
Address: 391 W. 36TH ST.
City-St-Zip: RIVIERA BCH, FL 33404

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: GAINES, BARBARA
Address: 380 W. 32ND ST.
City-St-Zip: RIVIERA BCH, FL 33404

Title: () Change () Addition
Name:
Address:
City-St-Zip:

I hereby certify that the information supplied with this filing does not qualify for the for the exemption stated in Chapter 119, Florida Statutes. I further certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with an address, with all other like empowered.

SIGNATURE: BARBARA GAINES

D

05/01/2006

Electronic Signature of Signing Officer or Director

_____ Date

2005 NOT-FOR-PROFIT CORPORATION ANNUAL REPORT

**FILED
Apr 26, 2005
Secretary of State**

DOCUMENT# N44788

Entity Name: REDEMPTIVE LIFE FELLOWSHIP, INC.

Current Principal Place of Business:

New Principal Place of Business:

2101 AUSTRALIAN AVE.
WEST PALM BEACH, FL 33407 US

Current Mailing Address:

New Mailing Address:

2101 AUSTRALIAN AVE
WEST PALM BEACH, FL 33407 US

FEI Number: 65-0286937 FEI Number Applied For () FEI Number Not Applicable () Certificate of Status Desired ()

Name and Address of Current Registered Agent:

Name and Address of New Registered Agent:

JAMES, KEITH A.
1655 PALM BEACH LAKES BLVD
SUITE 810, TOWER C
WEST PALM BEACH, FL 33401 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: _____

Electronic Signature of Registered Agent

_____ Date

OFFICERS AND DIRECTORS:

ADDITIONS/CHANGES TO OFFICERS AND DIRECTORS:

Title: D () Delete
Name: BEAN, JAMES,
Address: 425 N.E. 14TH AVENUE
City-St-Zip: BOYNTON BEACH, FL

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: RAY, HAROLD CALVIN,
Address: 11771 LITTLESTONE CT
City-St-Zip: W. PALM BEACH, FL

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: RAY, BRENDA J.,
Address: 11771 LITTLESTONE CT
City-St-Zip: W. PALM BEACH, FL

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: SIMPSON, FERMAL,
Address: 6051 ADAMS STREET
City-St-Zip: P. BCH. GARDENS, FL

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: MOORE, WILLIE
Address: 391 W. 36TH ST.
City-St-Zip: RIVIERA BCH, FL 33404

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: GAINES, BARBARA
Address: 380 W. 32ND ST.
City-St-Zip: RIVIERA BCH, FL 33404

Title: () Change () Addition
Name:
Address:
City-St-Zip:

I hereby certify that the information supplied with this filing does not qualify for the for the exemption stated in Section 119.07(3)(i), Florida Statutes. I further certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with an address, with all other like empowered.

SIGNATURE: BARBARA GAINES

D

04/26/2005

Electronic Signature of Signing Officer or Director

_____ Date

2004 NOT-FOR-PROFIT CORPORATION ANNUAL REPORT

**FILED
Apr 28, 2004
Secretary of State**

DOCUMENT# N44788

Entity Name: REDEMPTIVE LIFE FELLOWSHIP, INC.

Current Principal Place of Business:

New Principal Place of Business:

2101 AUSTRALIAN AVE.
WEST PALM BEACH, FL 33407 US

Current Mailing Address:

New Mailing Address:

2101 AUSTRALIAN AVE
WEST PALM BEACH, FL 33407 US

FEI Number: 65-0286937 FEI Number Applied For () FEI Number Not Applicable () Certificate of Status Desired (X)

Name and Address of Current Registered Agent:

Name and Address of New Registered Agent:

JAMES, KEITH A.
1655 PALM BEACH LAKES BLVD
SUITE 810, TOWER C
WEST PALM BEACH, FL 33401 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: _____

Electronic Signature of Registered Agent

_____ Date

OFFICERS AND DIRECTORS:

ADDITIONS/CHANGES TO OFFICERS AND DIRECTORS:

Title: D () Delete
Name: BEAN, JAMES,
Address: 425 N.E. 14TH AVENUE
City-St-Zip: BOYNTON BEACH, FL

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: RAY, HAROLD CALVIN,
Address: 11771 LITTLESTONE CT
City-St-Zip: W. PALM BEACH, FL

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: RAY, BRENDA J.,
Address: 11771 LITTLESTONE CT
City-St-Zip: W. PALM BEACH, FL

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: SIMPSON, FERMAL,
Address: 6051 ADAMS STREET
City-St-Zip: P. BCH. GARDENS, FL

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: MOORE, WILLIE
Address: 391 W. 36TH ST.
City-St-Zip: RIVIERA BCH, FL 33404

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: D () Delete
Name: GAINES, BARBARA
Address: 380 W. 32ND ST.
City-St-Zip: RIVIERA BCH, FL 33404

Title: () Change () Addition
Name:
Address:
City-St-Zip:

I hereby certify that the information supplied with this filing does not qualify for the for the exemption stated in Section 119.07(3)(i), Florida Statutes. I further certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with an address, with all other like empowered.

SIGNATURE: BARBARA GAINES

D

04/28/2004

Electronic Signature of Signing Officer or Director

_____ Date

2003 UNIFORM BUSINESS REPORT (UBR)

DOCUMENT# N44788

FILED
May 01, 2003
Secretary of State

Entity Name: REDEMPTIVE LIFE FELLOWSHIP, INC.

Current Principal Place of Business:

2101 AUSTRALIAN AVE.
WEST PALM BEACH, FL 33407 US

New Principal Place of Business:

Current Mailing Address:

2101 AUSTRALIAN AVE
WEST PALM BEACH, FL 33407 US

New Mailing Address:

FEI Number: 65-0286937 FEI Number Applied For () FEI Number Not Applicable () Certificate of Status Desired ()

Name and Address of Current Registered Agent:

JAMES, KEITH A.
1655 PALM BEACH LAKES BLVD
SUITE 810, TOWER C
WEST PALM BEACH, FL 33401 US

Name and Address of New Registered Agent:

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: _____

Electronic Signature of Registered Agent

_____ Date

OFFICERS AND DIRECTORS:

Title: D () Delete
Name: BEAN, JAMES,
Address: 425 N.E. 14TH AVENUE
City-St-Zip: BOYNTON BEACH, FL

Title: D () Delete
Name: RAY, HAROLD CALVIN,
Address: 11771 LITTLESTONE CT
City-St-Zip: W. PALM BEACH, FL

Title: D () Delete
Name: RAY, BRENDA J.,
Address: 11771 LITTLESTONE CT
City-St-Zip: W. PALM BEACH, FL

Title: D () Delete
Name: SIMPSON, FERMAL,
Address: 6051 ADAMS STREET
City-St-Zip: P. BCH. GARDENS, FL

Title: D () Delete
Name: MOORE, WILLIE
Address: 391 W. 36TH ST.
City-St-Zip: RIVIERA BCH, FL 33404

Title: D () Delete
Name: GAINES, BARBARA
Address: 380 W. 32ND ST.
City-St-Zip: RIVIERA BCH, FL 33404

ADDITIONS/CHANGES TO OFFICERS AND DIRECTORS:

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: () Change () Addition
Name:
Address:
City-St-Zip:

Title: () Change () Addition
Name:
Address:
City-St-Zip:

I hereby certify that the information supplied with this filing does not qualify for the for the exemption stated in Section 119.07(3)(i), Florida Statutes. I further certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with an address, with all other like empowered.

SIGNATURE: BARBARA GAINES

D

05/01/2003

Electronic Signature of Signing Officer or Director

_____ Date

2002 UNIFORM BUSINESS REPORT (UBR)

FILED
May 24, 2002 8:00 am
Secretary of State

05-24-2002 91288 034 ****61.25

DOCUMENT # N44788

1. Entity Name

REDEMPTIVE LIFE FELLOWSHIP, INC.

Principal Place of Business

Mailing Address

2101 AUSTRALIAN AVE.
 WEST PALM BEACH FL 33407
 US

2101 AUSTRALIAN AVE
 WEST PALM BEACH FL 33407
 US

433867



DO NOT WRITE IN THIS SPACE

2. Principal Place of Business

3. Mailing Address

Suite, Apt. #, etc.

Suite, Apt. #, etc.

City & State

City & State

4. FEI Number

65-0286937

Applied For

Not Applicable

Zip

Country

Zip

Country

5. Certificate of Status Desired

\$8.75 Additional Fee Required

6. Name and Address of Current Registered Agent

7. Name and Address of New Registered Agent

JAMES, KEITH A.
1655 PALM BEACH LAKES BLVD
SUITE 810, TOWER C
WEST PALM BEACH FL 33401

Name
 Street Address (P.O. Box Number is Not Acceptable)

City **FL** Zip Code

8. The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the state of Florida

SIGNATURE

Signature, typed or printed name of registered agent and title if applicable

(NOTE: Registered Agent signature required when reinstating)

DATE

FILE NOW: FEE IS \$61.25

9. Election Campaign Financing Trust Fund Contribution.

\$5.00 May Be Added to Fees

Make Check Payable to Department of State

10. OFFICERS AND DIRECTORS

11. ADDITIONS/CHANGES TO OFFICERS AND DIRECTORS IN 10

TITLE	D	<input type="checkbox"/> Delete
NAME	BEAN, JAMES	
STREET ADDRESS	425 N.E. 14TH AVENUE	
CITY-ST-ZIP	BOYNTON BEACH FL	
TITLE	D	<input type="checkbox"/> Delete
NAME	RAY, HAROLD CALVIN	
STREET ADDRESS	11771 LITTLESTONE CT	
CITY-ST-ZIP	W. PALM BEACH FL	
TITLE	D	<input type="checkbox"/> Delete
NAME	RAY, BRENDA J.	
STREET ADDRESS	11771 LITTLESTONE CT	
CITY-ST-ZIP	W. PALM BEACH FL	
TITLE	D	<input type="checkbox"/> Delete
NAME	SIMPSON, FERMAL	
STREET ADDRESS	6051 ADAMS STREET	
CITY-ST-ZIP	P. BCH. GARDENS FL	
TITLE	D	<input type="checkbox"/> Delete
NAME	MOORE, WILLIE	
STREET ADDRESS	391 W. 36TH ST.	
CITY-ST-ZIP	RIVIERA BCH FL 33404	
TITLE	D	<input type="checkbox"/> Delete
NAME	GAINES, BARBARA	
STREET ADDRESS	380 W. 32ND ST.	
CITY-ST-ZIP	RIVIERA BCH FL 33404	

TITLE		<input type="checkbox"/> Change <input type="checkbox"/> Addition
NAME		
STREET ADDRESS		
CITY-ST-ZIP		
TITLE		<input type="checkbox"/> Change <input type="checkbox"/> Addition
NAME		
STREET ADDRESS		
CITY-ST-ZIP		
TITLE		<input type="checkbox"/> Change <input type="checkbox"/> Addition
NAME		
STREET ADDRESS		
CITY-ST-ZIP		
TITLE		<input type="checkbox"/> Change <input type="checkbox"/> Addition
NAME		
STREET ADDRESS		
CITY-ST-ZIP		

12. I hereby certify that the information supplied with this filing does not qualify for the exemption stated in Section 119.07(3)(i), Florida Statutes. I further certify that the information indicated on this report or supplemental report is true and accurate and that my signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears in Block 10 or Block 11 if changed, or on an attachment with an address, with all other like empowered.

SIGNATURE: SIGNATURE REQUIRED

SIGNATURE AND TYPED OR PRINTED NAME OF SIGNING OFFICER OR DIRECTOR

Date Regular Commission Meeting

October 2, 2014

Page 29 of 84

CR2E037 (9/01)

05-11-2001 90027 023 ****61.25

DOCUMENT # N44788

1. Entity Name

REDEMPIVE LIFE FELLOWSHIP, INC.

Principal Place of Business

2101 AUSTRALIAN AVE.
 WEST PALM BEACH FL 33407
 US

Mailing Address

2101 AUSTRALIAN AVE
 WEST PALM BEACH FL 33407
 US



DO NOT WRITE IN THIS SPACE

2. Principal Place of Business

Suite, Apt. #, etc.

City & State

Zip

Country

3. Mailing Address

Suite, Apt. #, etc.

City & State

Zip

Country

4. FEI Number

65-0286937

Applied For
 Not Applicable

5. Certificate of Status Desired

\$8.75 Additional
 Fee Required

6. Name and Address of Current Registered Agent

JAMES, KEITH A.
1655 PALM BEACH LAKES BLVD
SUITE 810, TOWER C
WEST PALM BEACH FL 33401

7. Name and Address of New Registered Agent

Name

Street Address (P.O. Box Number is Not Acceptable)

City

FL

Zip Code

8. The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the state of Florida.

SIGNATURE _____ DATE _____
Signature: typed or printed name of registered agent and title if applicable (NOTE: Registered Agent signature required when reinstating)

FILE NOW:
FEES IS \$61.25

9. Election Campaign Financing
 Trust Fund Contribution.

\$5.00 May Be
 Added to Fees

Make Check Payable to
Department of State

10. OFFICERS AND DIRECTORS

TITLE	D	<input type="checkbox"/> Delete
NAME	BEAN, JAMES	
STREET ADDRESS	425 N.E. 14TH AVENUE	
CITY-ST-ZIP	BOYNTON BEACH FL	
TITLE	D	<input type="checkbox"/> Delete
NAME	RAY, HAROLD CALVIN	
STREET ADDRESS	11771 LITTLESTONE CT	
CITY-ST-ZIP	W. PALM BEACH FL	
TITLE	D	<input type="checkbox"/> Delete
NAME	RAY, BRENDA J.	
STREET ADDRESS	11771 LITTLESTONE CT	
CITY-ST-ZIP	W. PALM BEACH FL	
TITLE	D	<input type="checkbox"/> Delete
NAME	SIMPSON, FERMAL	
STREET ADDRESS	6051 ADAMS STREET	
CITY-ST-ZIP	P. BCH. GARDENS FL	
TITLE	D	<input type="checkbox"/> Delete
NAME	MOORE, WILLIE	
STREET ADDRESS	391 W. 36TH ST.	
CITY-ST-ZIP	RIVIERA BCH FL 33404	
TITLE	D	<input type="checkbox"/> Delete
NAME	GAINES, BARBARA	
STREET ADDRESS	380 W. 32ND ST.	
CITY-ST-ZIP	RIVIERA BCH FL 33404	

11. ADDITIONS/CHANGES TO OFFICERS AND DIRECTORS IN 10

TITLE	<input type="checkbox"/> Change <input type="checkbox"/> Addition
NAME	
STREET ADDRESS	
CITY-ST-ZIP	
TITLE	<input type="checkbox"/> Change <input type="checkbox"/> Addition
NAME	
STREET ADDRESS	
CITY-ST-ZIP	
TITLE	<input type="checkbox"/> Change <input type="checkbox"/> Addition
NAME	
STREET ADDRESS	
CITY-ST-ZIP	
TITLE	<input type="checkbox"/> Change <input type="checkbox"/> Addition
NAME	
STREET ADDRESS	
CITY-ST-ZIP	
TITLE	<input type="checkbox"/> Change <input type="checkbox"/> Addition
NAME	
STREET ADDRESS	
CITY-ST-ZIP	

12. I hereby certify that the information supplied with this filing does not qualify for the exemption stated in Section 119.07(3)(i), Florida Statutes. I further certify that the information indicated on this report or supplemental report is true and accurate and that my signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears in Block 10 or Block 11 if changed, or on an attachment with an address, with all other like empowered.

SIGNATURE: Brenda Ray
SIGNATURE AND TYPED OR PRINTED NAME OF AGENT, OFFICER OR DIRECTOR

BRENDA RAY 561 832 6077
Date Daytime Phone #

CR2E037 (10/00)

2000 UNIFORM BUSINESS REPORT (UBR)

DOCUMENT # **N44788**

1. Entity Name
REDEMPITIVE LIFE FELLOWSHIP, INC.

FILED
May 10, 2000 8:00 am
Secretary of State
05-10-2000 90176 031 *****61.25

Principal Place of Business Mailing Address
2101 AUSTRALIAN AVE 2101 AUSTRALIAN AVE
WEST PALM BEACH FL 33407 WEST PALM BEACH FL 33407-5630
US US

2. Principal Place of Business 3. Mailing Address
Suite, Apt #, etc. Suite, Apt #, etc.

City & State City & State
Zip Country Zip Country



DO NOT WRITE IN THIS SPACE

4. FEI Number **65-0286937** Applied For
Not Applicable
5. Certificate of Status Desired **\$8.75** Additional
Fee Required

6. Name and Address of Current Registered Agent
JAMES, KEITH A.
1655 PALM BEACH LAKES BLVD
SUITE 810, TOWER C
WEST PALM BEACH FL 33401

7. Name and Address of New Registered Agent
Name
Street Address (P.O. Box Number is Not Acceptable)
City **FL** Zip Code

8. The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the state of Florida.

SIGNATURE _____ DATE _____
Signature, typed or printed name of registered agent and title if applicable. (NOTE: Registered Agent signature required when reinstating)

FILE NOW:
FEE IS \$61.25

9. Election Campaign Financing Trust Fund Contribution. **\$5.00** May Be Added to Fees

Make Check Payable to Department of State

10. OFFICERS AND DIRECTORS

TITLE NAME	D BEAN, JAMES	<input type="checkbox"/> Delete
STREET ADDRESS	425 N.E. 14TH AVENUE	
CITY-ST-ZIP	BOYNTON BEACH FL	
TITLE NAME	D RAY, HAROLD CALVIN	<input type="checkbox"/> Delete
STREET ADDRESS	11771 LITTLESTONE CT	
CITY-ST-ZIP	W. PALM BEACH FL	
TITLE NAME	D RAY, BRENDA J.	<input type="checkbox"/> Delete
STREET ADDRESS	11771 LITTLESTONE CT	
CITY-ST-ZIP	W. PALM BEACH FL	
TITLE NAME	D SIMPSON, FERMAL	<input type="checkbox"/> Delete
STREET ADDRESS	6051 ADAMS STREET	
CITY-ST-ZIP	P. BCH. GARDENS FL	
TITLE NAME	D CLOUGH, FAITH	<input checked="" type="checkbox"/> Delete
STREET ADDRESS	501 W. 1ST ST.	
CITY-ST-ZIP	W. PALM BEACH FL 33404	
TITLE NAME		<input type="checkbox"/> Delete
STREET ADDRESS		
CITY-ST-ZIP		

11. ADDITIONS/CHANGES TO OFFICERS AND DIRECTORS IN 10

TITLE NAME	D WILLIE MOORE	<input type="checkbox"/> Change <input checked="" type="checkbox"/> Addition
STREET ADDRESS	391 WEST 36TH STREET	
CITY-ST-ZIP	RIVIERA BEACH, FL 33404	
TITLE NAME	D BARBARA GARNES	<input type="checkbox"/> Change <input checked="" type="checkbox"/> Addition
STREET ADDRESS	390 WEST 32ND STREET	
CITY-ST-ZIP	RIVIERA BEACH, FL 33404	
TITLE NAME		<input type="checkbox"/> Change <input type="checkbox"/> Addition
STREET ADDRESS		
CITY-ST-ZIP		
TITLE NAME		<input type="checkbox"/> Change <input type="checkbox"/> Addition
STREET ADDRESS		
CITY-ST-ZIP		

12. I hereby certify that the information supplied with this filing does not qualify for the exemption stated in Section 119.07(3)(i), Florida Statutes. I further certify that the information indicated on this report or supplemental report is true and accurate and that my signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears in Block 10 or Block 11 if changed, or on an attachment with an address, with all other like information.

SIGNATURE: _____ DATE _____ DAYTIME PHONE # _____
SIGNATURE REQUIRES
SMALL, PRE AND TYPED OR PRINTED NAME OF SIGNING OFFICER OR DIRECTOR

FILE NOW: FILING FEE IS \$61.25

FILED
May 06, 1999 8:00 am
Secretary of State

05-06-1999 90080 023 ****61.25

NONPROFIT CORPORATION ANNUAL REPORT 1999		FLORIDA DEPARTMENT OF STATE Katherine Harris Secretary of State DIVISION OF CORPORATIONS
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DOCUMENT # N44788
 1. Corporation Name
REDEMPIVE LIFE FELLOWSHIP, INC.

Principal Place of Business 2101 AUSTRALIAN AVE. WEST PALM BEACH FL 33407 US	Mailing Address 2101 AUSTRALIAN AVE WEST PALM BEACH FL 33407 US
---	--



2. Principal Place of Business 21 Suite, Apt. #, etc. 22 City & State 23 Zip Country 25	2a. Mailing Address 26 Suite, Apt. #, etc. 27 City & State 28 Zip Country 29	3. Date Incorporated or Qualified 08/20/1991	4. FEI Number 65-0286937 Applied For Not Applicable
5. Certificate of Status Desired <input type="checkbox"/>		\$8.75 Additional Fee Required	
6. Election Campaign Financing Trust Fund Contribution <input type="checkbox"/>		\$5.00 May Be Added to Fees	

9. Name and Address of Current Registered Agent JAMES, KEITH A. 1655 PALM BEACH LAKES BLVD SUITE 810, TOWER C WEST PALM BEACH FL 33401	10. Name and Address of New Registered Agent 81 Name 82 Street Address (P.O. Box Number is Not Acceptable) 83 84 City FL 85 Zip Code
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11. Pursuant to the provisions of Sections 617.0502 and 617.1508, Florida Statutes, the above-named corporation submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida. Such change was authorized by the corporation's board of directors. I hereby accept the appointment as registered agent. I am familiar with, and accept the obligations of, Section 617.0503, Florida Statutes.

SIGNATURE _____
Signature, typed or printed name of registered agent and title if applicable. (NOTE: Registered Agent signature required when reinstating) DATE _____

12. OFFICERS AND DIRECTORS		13. ADDITIONS/CHANGES TO OFFICERS AND DIRECTORS IN 12	
TITLE D <input type="checkbox"/> DELETE	1.1 TITLE <input type="checkbox"/> Change <input type="checkbox"/> Addition	NAME BEAN, JAMES	1.2 NAME
STREET ADDRESS 425 N.E. 14TH AVENUE	1.3 STREET ADDRESS	CITY-ST-ZIP BOYNTON BEACH FL	1.4 CITY-ST-ZIP
TITLE D <input type="checkbox"/> DELETE	2.1 TITLE <input type="checkbox"/> Change <input type="checkbox"/> Addition	NAME RAY, HAROLD CALVIN	2.2 NAME
STREET ADDRESS 11771 LITTLESTONE CT	2.3 STREET ADDRESS	CITY-ST-ZIP W. PALM BEACH FL	2.4 CITY-ST-ZIP
TITLE D <input type="checkbox"/> DELETE	3.1 TITLE <input type="checkbox"/> Change <input type="checkbox"/> Addition	NAME RAY, BRENDA J.	3.2 NAME
STREET ADDRESS 11771 LITTLESTONE CT	3.3 STREET ADDRESS	CITY-ST-ZIP W. PALM BEACH FL	3.4 CITY-ST-ZIP
TITLE D <input checked="" type="checkbox"/> DELETE	4.1 TITLE <input type="checkbox"/> Change <input type="checkbox"/> Addition	NAME RICHARDSON, EARL	4.2 NAME
STREET ADDRESS 612 31ST STREET	4.3 STREET ADDRESS	CITY-ST-ZIP WEST PALM BEACH FL	4.4 CITY-ST-ZIP
TITLE D <input type="checkbox"/> DELETE	5.1 TITLE <input type="checkbox"/> Change <input type="checkbox"/> Addition	NAME SIMPSON, FERMAL	5.2 NAME
STREET ADDRESS 6051 ADAMS STREET	5.3 STREET ADDRESS	CITY-ST-ZIP P. BCH. GARDENS FL	5.4 CITY-ST-ZIP
TITLE D <input type="checkbox"/> DELETE	6.1 TITLE <input type="checkbox"/> Change <input type="checkbox"/> Addition	NAME CLOUGH, FAITH	6.2 NAME
STREET ADDRESS 501 W. 1ST ST.	6.3 STREET ADDRESS	CITY-ST-ZIP W. PALM BEACH FL 33404	6.4 CITY-ST-ZIP

14. I hereby certify that the information supplied with this filing does not qualify for the exemption stated in Section 119.07(3)(i), Florida Statutes. I further certify that the information indicated on this annual report or supplemental annual report is true and accurate and that my signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears in Block 12 or Block 13 if changed, or on an attachment with an address, with all other like empowered.

SIGNATURE: SIGNATURE REQUIRED HAROLD CALVIN RAY 04/29/99
SIGNATURE AND TYPED OR PRINTED NAME OF SIGNING OFFICER OR DIRECTOR Date

CR2E037 (11/98)

FILE NOW: FILING FEE IS \$61.25

FILED
Oct 14 1998 8:00am
Secretary of State

NONPROFIT CORPORATION ANNUAL REPORT 1998		FLORIDA DEPARTMENT OF STATE Sandra B. Mortham Secretary of State DIVISION OF CORPORATIONS
--	---	---

DOCUMENT # N44788 (0)
1. Corporation Name
REDEMPITIVE LIFE FELLOWSHIP, INC.



Principal Place of Business		Mailing Address	
2101 AUSTRALIAN AVE. WEST PALM BEACH FL 33407 US		2101 AUSTRALIAN AVE WEST PALM BEACH FL 33407 US	
21. Principal Place of Business	2a. Mailing Address	22. Suite, Apt. #, etc.	27. Suite, Apt. #, etc.
23. City & State	28. City & State	24. Zip	29. Zip
25. Country	30. Country		

3. Date Incorporated or Qualified 08/20/1991	Applied For Not Applicable
4. FEI Number 65-0286937	
5. Certificate of Status Desired <input type="checkbox"/>	\$8.75 Additional Fee Required
6. Election Campaign Financing Trust Fund Contribution <input type="checkbox"/>	\$5.00 May Be Added to Fees
7. Is this nonprofit corporation a homeowners association? <input type="checkbox"/> Yes <input type="checkbox"/> No	
8. This corporation owes or has paid the current year Intangible Personal Property Tax due June 30. <input type="checkbox"/> Yes <input type="checkbox"/> No	

9. Name and Address of Current Registered Agent

JAMES, KEITH A.
1855 PALM BEACH LAKES BLVD
SUITE 810, TOWER C
WEST PALM BEACH FL 33401

10. Name and Address of New Registered Agent

81. Name
82. Street Address (P.O. Box Number is Not Acceptable)
83.
84. City
85. Zip Code

11. Pursuant to the provisions of Sections 617.0502 and 617.1508, Florida Statutes, the above-named corporation submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida. Such change was authorized by the corporation's board of directors. I hereby accept the appointment as registered agent. I am familiar with, and accept the obligations of, Section 617.0503, Florida Statutes.

SIGNATURE _____ DATE _____
Signature, typed or printed name of registered agent and 160 if applicable (NOTE: Registered Agent signature required when registering)

12. OFFICERS AND DIRECTORS		13. ADDITIONS/CHANGES TO OFFICERS AND DIRECTORS IN 12	
TITLE	NAME	1.1 TITLE	1.2 NAME
<input type="checkbox"/> DELETE	D BEAN, JAMES 425 N.E. 14TH AVENUE BOYNTON BEACH FL	<input type="checkbox"/> Change <input type="checkbox"/> Addition	
<input type="checkbox"/> DELETE	D RAY, HAROLD CALVIN 11771 LITTLESTONE CT W. PALM BEACH FL	<input type="checkbox"/> Change <input type="checkbox"/> Addition	
<input type="checkbox"/> DELETE	D RAY, BRENDA J. 11771 LITTLESTONE CT W. PALM BEACH FL	<input type="checkbox"/> Change <input type="checkbox"/> Addition	<i>Brenda Ray</i>
<input type="checkbox"/> DELETE	D RICHARDSON, EARL 612 31ST STREET WEST PALM BEACH FL	<input type="checkbox"/> Change <input type="checkbox"/> Addition	
<input type="checkbox"/> DELETE	D SIMPSON, FERMAL 8051 ADAMS STREET P. BCH. GARDENS FL	<input type="checkbox"/> Change <input type="checkbox"/> Addition	
<input type="checkbox"/> DELETE	D CLOUGH, FAITH 801 W. 1ST ST. W. PALM BEACH FL 33404	<input type="checkbox"/> Change <input type="checkbox"/> Addition	

1.3 STREET ADDRESS	1.4 CITY-ST-ZIP	2.1 TITLE	2.2 NAME	2.3 STREET ADDRESS	2.4 CITY-ST-ZIP	3.1 TITLE	3.2 NAME	3.3 STREET ADDRESS	3.4 CITY-ST-ZIP	4.1 TITLE	4.2 NAME	4.3 STREET ADDRESS	4.4 CITY-ST-ZIP	5.1 TITLE	5.2 NAME	5.3 STREET ADDRESS	5.4 CITY-ST-ZIP	6.1 TITLE	6.2 NAME	6.3 STREET ADDRESS	6.4 CITY-ST-ZIP	

14. I hereby certify that the information supplied with this filing does not qualify for the exemption stated in Section 119.07(3)(a), Florida Statutes. I further certify that the information indicated on this annual report or supplemental annual report is true and accurate and that my signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes, and that my name appears in Block 12 or Block 13 if changed, or on an attachment with an address.

SIGNATURE: *Brenda Ray* _____
SIGNATURE AND TYPED OR PRINTED NAME OF SIGNING OFFICER OR DIRECTOR

FILE NOW: FILING FEE IS \$61.25

FILED
May 19 1997 8:00am
Secretary of State

NONPROFIT CORPORATION ANNUAL REPORT 1997	FLORIDA DEPARTMENT OF STATE Sandra S. Northam Secretary of State DIVISION OF CORPORATIONS
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DOCUMENT # **N44788** (0)

REDEMPITIVE LIFE FELLOWSHIP, INC.

Principal Place of Business 2101 AUSTRALIAN AVE WEST PALM BEACH FL 33407 US	Mailing Address 2101 AUSTRALIAN AVE WEST PALM BEACH FL 33407-5630 US
--	---



2. Principal Place of Business	2a. Mailing Address	3. Date Incorporated or Qualified 08/20/1991	3a. Date of Last Report 05/01/1996
21. Suite, Apt. #, etc.	2b. Suite, Apt. #, etc.	4. FEI Number 65-0286937	Applied For <input type="checkbox"/> Not Applicable
22. City & State	27. City & State	5. Certificate of Status Desired <input type="checkbox"/>	\$8.75 Additional Fee Required
23. Zip	28. Zip	6. Election Campaign Financing Trust Fund Contribution <input type="checkbox"/>	\$5.00 May Be Added to Fees
24. Country	29. Country	8. This corporation has liability for intangible tax under s. 199.032, Florida Statutes <input type="checkbox"/> Yes <input type="checkbox"/> No	

9. Name and Address of Current Registered Agent JAMES, KEITH A. 777 S. FLAGLER DRIVE SUITE 310 WEST PALM BEACH FL 33401	10. Name and Address of New Registered Agent 81. Name JAMES, KEITH A. 82. Street Address (P.O. Box Number is Not Acceptable) 1655 PALM BEACH LAKES DR. 83. Suite 810 Tower C 84. City WEST PALM BEACH FL 85. Zip Code 33401
--	---

11. Pursuant to the provisions of Sections 617.0502 and 617.1508, Florida Statutes, the above-named corporation submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida. Such change was authorized by the corporation's board of directors. I hereby accept the appointment as registered agent. I am familiar with, and accept the obligations of, Section 617.0503, Florida Statutes.

SIGNATURE _____ DATE _____
Signature typed or printed name of registered agent and title if applicable. (NOTE: Registered Agent signature required when reinstating)

12. OFFICERS AND DIRECTORS		13. ADDITIONS/CHANGES TO OFFICERS AND DIRECTORS IN 12	
TITLE	D	1.1 TITLE	<input type="checkbox"/> Change <input type="checkbox"/> Addition
NAME	BEAN, JAMES	1.2 NAME	
STREET ADDRESS	425 N.E. 14TH AVENUE	1.3 STREET ADDRESS	
CITY - ST - ZIP	BOYNTON BEACH FL	1.4 CITY - ST - ZIP	
TITLE	D	2.1 TITLE	<input checked="" type="checkbox"/> Change <input type="checkbox"/> Addition
NAME	RAY, HAROLD CALVIN	2.2 NAME	
STREET ADDRESS	4830 DORCHESTER MEWS	2.3 STREET ADDRESS	11771 LITTLESTONE CT.
CITY - ST - ZIP	W. PALM BEACH FL	2.4 CITY - ST - ZIP	WEST PALM BEACH, FL 33412
TITLE	D	3.1 TITLE	<input checked="" type="checkbox"/> Change <input type="checkbox"/> Addition
NAME	RAY, BRENDA J.	3.2 NAME	
STREET ADDRESS	4830 DORCHESTER MEWS	3.3 STREET ADDRESS	11771 LITTLESTONE CT.
CITY - ST - ZIP	W. PALM BEACH FL	3.4 CITY - ST - ZIP	WEST PALM BEACH, FL 33412
TITLE	D	4.1 TITLE	<input type="checkbox"/> Change <input type="checkbox"/> Addition
NAME	RICHARDSON, EARL	4.2 NAME	
STREET ADDRESS	612 31ST STREET	4.3 STREET ADDRESS	
CITY - ST - ZIP	WEST PALM BEACH FL	4.4 CITY - ST - ZIP	
TITLE	D	5.1 TITLE	<input type="checkbox"/> Change <input type="checkbox"/> Addition
NAME	SIMPSON, FERMAL	5.2 NAME	
STREET ADDRESS	6051 ADAMS STREET	5.3 STREET ADDRESS	
CITY - ST - ZIP	P. BCH. GARDENS FL	5.4 CITY - ST - ZIP	
TITLE	D	6.1 TITLE	<input type="checkbox"/> Change <input type="checkbox"/> Addition
NAME	CLOUGH, FAITH	6.2 NAME	
STREET ADDRESS	501 W. 1ST ST.	6.3 STREET ADDRESS	
CITY - ST - ZIP	W. PALM BEACH FL 33404	6.4 CITY - ST - ZIP	

14. I do hereby certify that the information supplied with this filing does not qualify for the exemption stated in Section 119.07(3)(i), Florida Statutes. I further certify that the information indicated on this annual report or supplemental annual report is true and accurate and that my signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears in Block 12 or Block 13 if changed, or in an attachment with an address.

SIGNATURE: _____ DATE: **4-21-97** DAYTIME PHONE: **832 6077**
SIGNATURE AND TYPED OR PRINTED NAME OF SIGNING OFFICER OR DIRECTOR

FILE NOW: FILING FEE IS \$61.25

NONPROFIT CORPORATION
ANNUAL REPORT
1996



FLORIDA DEPARTMENT OF STATE
Sandra B. Mortham
Secretary of State
DIVISION OF CORPORATIONS

FILED
May 01 1996 8:00 am
Secretary of State

DOCUMENT # N44788 (0)

1. Corporation Name
REDEMPTIVE LIFE FELLOWSHIP, INC.

Principal Place of Business Mailing Address
2101 AUSTRALIAN AVE WEST PALM BEACH FL 33407 US

2. Principal Place of Business 2a. Mailing Address
21 Suite, Apt. #, etc. 26 Suite, Apt. #, etc.
22 City & State 27 City & State
23 Zip Country 28 Zip Country
24 25 29 30

3. Date Incorporated or Qualified **08/20/1991** 3a. Date of Last Report **04/05/1995**
4. FEI Number **65-0286937** Applied For Not Applicable
5. Certificate of Status Desired **\$8.75 Additional Fee Required**
6. Election Campaign Financing Trust Fund Contribution **\$5.00 May Be Added to Fees**
8. This corporation has liability for intangible tax under s. 199.032, Florida Statutes Yes No

9. Name and Address of Current Registered Agent
**JAMES, KEITH A.
777 S. FLAGLER DRIVE
SUITE 310
WEST PALM BEACH FL 33401**

10. Name and Address of New Registered Agent
01 Name
02 Street Address (P.O. Box Number is Not Acceptable)
03
04 City **FL** 05 Zip Code

11. Pursuant to the provisions of Sections 617.0502 and 617.1508, Florida Statutes, the above-named corporation submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida. Such change was authorized by the corporation's board of directors. I hereby accept the appointment as registered agent. I am familiar with, and accept the obligations of, Section 617.0503, Florida Statutes.

SIGNATURE _____ DATE _____
Signature, typed or printed name of registered agent, or both, if applicable. NOTE: Registered Agent signature required when reinstating.

12. OFFICERS AND DIRECTORS

TITLE	D	<input type="checkbox"/> DELETE
NAME	BEAN, JAMES	
STREET ADDRESS	425 N.E. 14TH AVENUE	
CITY-ST-ZIP	BOYNTON BEACH FL	
TITLE	D	<input type="checkbox"/> DELETE
NAME	RAY, HAROLD CALVIN	
STREET ADDRESS	4830 DORCHESTER MEWS	
CITY-ST-ZIP	W. PALM BEACH FL	
TITLE	D	<input type="checkbox"/> DELETE
NAME	RAY, BRENDA J.	
STREET ADDRESS	4830 DORCHESTER MEWS	
CITY-ST-ZIP	W. PALM BEACH FL	
TITLE	D	<input type="checkbox"/> DELETE
NAME	RICHARDSON, EARL	
STREET ADDRESS	612 31ST STREET	
CITY-ST-ZIP	WEST PALM BEACH FL	
TITLE	D	<input type="checkbox"/> DELETE
NAME	SIMPSON, FERMAL	
STREET ADDRESS	6051 ADAMS STREET	
CITY-ST-ZIP	P. BCH. GARDENS FL	
TITLE	D	<input type="checkbox"/> DELETE
NAME	CLOUGH, FAITH	
STREET ADDRESS	501 W. 1ST ST.	
CITY-ST-ZIP	W. PALM BEACH FL 33404	

13. ADDITIONS/CHANGES TO OFFICERS AND DIRECTORS IN 12

11 TITLE	<input type="checkbox"/> Change <input type="checkbox"/> Addition
12 NAME	
13 STREET ADDRESS	
14 CITY-ST-ZIP	
21 TITLE	<input type="checkbox"/> Change <input type="checkbox"/> Addition
22 NAME	
23 STREET ADDRESS	
24 CITY-ST-ZIP	
31 TITLE	<input type="checkbox"/> Change <input type="checkbox"/> Addition
32 NAME	
33 STREET ADDRESS	
34 CITY-ST-ZIP	
41 TITLE	<input type="checkbox"/> Change <input type="checkbox"/> Addition
42 NAME	
43 STREET ADDRESS	
44 CITY-ST-ZIP	
51 TITLE	<input type="checkbox"/> Change <input type="checkbox"/> Addition
52 NAME	
53 STREET ADDRESS	
54 CITY-ST-ZIP	
61 TITLE	<input type="checkbox"/> Change <input type="checkbox"/> Addition
62 NAME	
63 STREET ADDRESS	
64 CITY-ST-ZIP	

14. I do hereby certify that the information supplied with this filing is voluntarily furnished and does not qualify for the exemption stated in Section 119.07(3)(k), Florida Statutes. I further certify that the information indicated on this annual report or supplemental annual report is true and accurate and that my signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes, and that my name appears in Block 12 or Block 13 if changed, or on an attachment with an address.

SIGNATURE: *[Handwritten Signature]*
SIGNATURE AND TYPED OR PRINTED NAME OF SIGNING OFFICER OR DIRECTOR

CR20037 (12/05)

**CORPORATION
ANNUAL REPORT
1995**



FLORIDA DEPARTMENT OF STATE
Sandra B. Morham
Secretary of State
DIVISION OF CORPORATIONS

**FILED
SECRETARY OF STATE
DIVISION OF CORPORATIONS**
95 APR -5 PM 3: 12

DOCUMENT # N44788 (0)
1. Corporation Name
REDEMPIVE LIFE FELLOWSHIP, INC.

DO NOT WRITE IN THIS SPACE

3. Date incorporated or Qualified 08/20/1991	3a. Date of Last Report 05/01/1994
4. FEI Number 65-0286937	Applied For <input type="checkbox"/> Not Applicable
5. Certificate of Status Desired <input type="checkbox"/>	\$8.75 Additional Fee Required
6. Election Campaign Financing Trust Fund Contribution <input type="checkbox"/>	\$5.00 May Be Added to Fees
7. Nonprofit with IRS 501(c)(3) Tax Exempt Status <input checked="" type="checkbox"/>	\$68.75 Supplemental Fee Not Required
8. This corporation has liability for intangible tax under S. 199.032, Florida Statutes <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Principal Place of Business 2501 BRISTOL DRIVE WEST PALM BEACH FL 33409		Mailing Address 2501 BRISTOL DRIVE WEST PALM BEACH FL 33409	
2. Principal Place of Business 21 2101 AUSTRALIAN AVE.	2a. Mailing Address 26 2101 AUSTRALIAN AVE		
22 Suits, Apt. #, etc.	27 Suite, Apt. #, etc.		
23 City & State	28 City & State		
24 Zip 33407	25 Country	29 Zip 33407	30 Country

9. Name and Address of Current Registered Agent JAMES, KEITH A. 777 S. FLAGLER DRIVE SUITE 310 WEST PALM BEACH FL 33401		10. Name and Address of New Registered Agent	
81 Name			
82 Street Address (P.O. Box Number is Not Acceptable)			
83			
84 City	FL	85 Zip Code	

11. Pursuant to the provisions of Sections 607.0502 and 607.1508, Florida Statutes, the above-named corporation submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida. Such change was authorized by the corporation's board of directors. I hereby accept the appointment as registered agent. I am familiar with, and accept the obligations of, Section 607.0505, Florida Statutes.

SIGNATURE _____ (NOTE: Registered Agent signature required when resigning) DATE _____

12. OFFICERS AND DIRECTORS		13. ADDITIONS/CHANGES TO OFFICERS AND DIRECTORS IN 12	
TITLE D	BEAN, JAMES 425 N.E. 14TH AVENUE BOYNTON BEACH FL	1.1 TITLE <input type="checkbox"/> Change <input type="checkbox"/> Addition	
NAME		1.2 NAME	
STREET ADDRESS		1.3 STREET ADDRESS	
CITY - ST - ZIP		1.4 CITY - ST - ZIP	
TITLE D	RAY, HAROLD CALVIN 4830 DORCHESTER MEWS W. PALM BEACH FL	2.1 TITLE <input type="checkbox"/> Change <input type="checkbox"/> Addition	
NAME		2.2 NAME	
STREET ADDRESS		2.3 STREET ADDRESS	
CITY - ST - ZIP		2.4 CITY - ST - ZIP	
TITLE D	RAY, BRENDA J. 4830 DORCHESTER MEWS W. PALM BEACH FL	3.1 TITLE <input type="checkbox"/> Change <input type="checkbox"/> Addition	
NAME		3.2 NAME	
STREET ADDRESS		3.3 STREET ADDRESS	
CITY - ST - ZIP		3.4 CITY - ST - ZIP	
TITLE D	RICHARDSON, EARL 612 31ST STREET WEST PALM BEACH FL	4.1 TITLE <input type="checkbox"/> Change <input type="checkbox"/> Addition	
NAME		4.2 NAME	
STREET ADDRESS		4.3 STREET ADDRESS	
CITY - ST - ZIP		4.4 CITY - ST - ZIP	
TITLE D	SIMPSON, FERMAL 6051 ADAMS STREET P. BCH. GARDENS FL	5.1 TITLE <input type="checkbox"/> Change <input type="checkbox"/> Addition	
NAME		5.2 NAME	
STREET ADDRESS		5.3 STREET ADDRESS	
CITY - ST - ZIP		5.4 CITY - ST - ZIP	
TITLE D	CLOUGH, FAITH 501 W. 18T ST. W. PALM BEACH FL 33404	6.1 TITLE <input type="checkbox"/> Change <input type="checkbox"/> Addition	
NAME		6.2 NAME	
STREET ADDRESS		6.3 STREET ADDRESS	
CITY - ST - ZIP		6.4 CITY - ST - ZIP	

14. I do hereby certify that the information supplied with this filing is voluntarily furnished and does not qualify for the exemption stated in Section 110.07(3)(b), Florida Statutes. I further certify that the information indicated on this annual report or supplemental annual report is true and accurate and that my signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 017, Florida Statutes; and that my name appears in Block 12 or Block 13 if changed, or on an attachment with an address.

SIGNATURE: *[Signature]*
SIGNATURE AND TITLE OR PRINTED NAME OF SIGNING OFFICER OR DIRECTOR

03-30-95 892-6077
Date Telephone (Area)



WPB Scandal: City Commissioner Has Business Ties With Church Under Scrutiny!

December 5, 2011 by Jose Lambiel

EXCLUSIVE West Palm Beach Commissioner Keith James has business ties to the Redemptive Life Fellowship Church, the religious groups whose leaders are accused by city officials of lining their pockets with taxpayers' money, Gossip Extra has learned.



Keith James

And about the time that Gossip Extra emailed and called James for comment, he went off on the topic during this morning's regular meeting of the commission!

And even though the Redemptive Life scandal wasn't on the agenda, James, a corporate lawyer by trade, demanded an investigation into the leaking of the story to Gossip Extra on Friday. He called the leaks unacceptable and defended the church as "good Samaritans."

— [Click here to catch up with the story here and here](#)

James makes no secret of being a member. And he told his commission colleagues this a.m. that he had done some work for the church.

What he didn't say: According to documents I reviewed, he is the registered agent of four corporations partly owned by the church's bishop, Harold Ray. Ray and two businesses he's involved in have been asked to return about \$240,000 to the city.

— *The Palm Beach Post has yet to cover this story. Be first to know and click to register for Gossip Extra's dirt alerts!*

The role of registered agent is to receive legal and financial documents as well as government notices.

"I am not representing the church in the HUD matter," James told me. "But I have represented the church in the past."

James, a Harvard Law grad elected to the seat in March, is the registered agent of the church and the Kingdom Dominion Network, which has been asked to return \$110,000 to the city.

He's also the registered agent of two inactive Ray corporations: The National Center for Faith-Based Initiatives and the Learn and Grow Child Development Center.

On Friday, Gossip Extra first reported that the city could be on the hook for \$4.1 million to the federal Department for Housing and Urban Development as a result of the relationship between the city and Ray's large church.

And over the summer, the city quietly asked HUD to look into the church's handing of \$1.6 million in grants between 2003 and 2010 to build low-income housing and the subsequent building, marketing and selling of the 22 houses near Coleman Park.

An audit by the city revealed, among 21 violations of the contract:

- While HUD mandates that the proceeds from the sale of the homes to be reinvested into more development, it doesn't appear that all of the \$2.5 million from the sale of the houses have been reinvested.
- Some of the city's money was used to pay the salaries of Redemptive Life board members, including Ray.
- A company owed by Ray and his wife and that used James as registered agent, Kingdom Dominion Network, was the listing agent of the homes and made \$110,000 in commissions.

GOSSIP EXTRA RECOMMENDS:

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GOSSIP EXTRA'S PHOTO DU JOUR



READ THIS BOOK

- Another one of Ray's companies was the selling agent for some homes. It made \$65,000 in commissions.
 - And yet another Ray company, Canaan Construction Corporation, allegedly had ties with the contractor who built the homes. Canaan was dismantled in 2008, according to state records.
- Ray has yet to comment on the scandal.

For more:

- [Feds investigate city-church \\$4 million-snafu](#)
- [Church at the heart of WPB housing scandal loses tax-exempt status](#)

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More From Gossip Extra:



West Palm Beach Church Scandal: City Commish Kimberly Mitchell Blames The City! | Smoking-Mad Bishop Harold Ray: I Got a Bum Rap! | OPINION: Don't Hold Your Breath For Answers in West Palm Beach/Redemptive Life Scandal! | New Scandal: City of West Palm Beach, Church Investigated in \$4 Million-Snafu | West Palm Beach/Church Scandal: The \$40,000-Debt of The Bishop's Wife

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If you enjoyed this post, please consider [leaving a comment](#) or [subscribing to the RSS feed](#) to have future articles delivered to your feed reader.

Comments

wpb resident says
December 5, 2011 at 12:39 pm

this has got scandal all over it — go jose and don't let up everyone in town is talking about this and you broke it before the post and channel 5 —great job and dont let up — if james or other politicos are involved they are supposed to recuse themselves from voting on any matters — including an investigation which mayor muoio should call for immediately unless the fbi beats them to it!

Steve says
December 5, 2011 at 1:29 pm

I think its funny that the crooked sheriff's anti corruption people didnt uncover this. They are way too busy arresting corrections deputies for accepting food stamps, like this isnt done everywhere, duh! I dont condone it but less important than uncovering this scandal and millions of dollars collected from the county. Great job Jose as usual

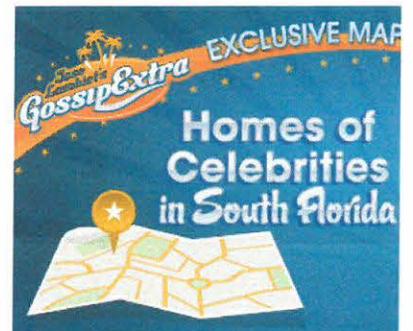
The Girl in BLACK PAJAMAS

BOOK 2 IN THE MURDER MYSTERY SERIES



By Chris Birdy

HEAR THE GOSSIP, SEE THE SIGHTS



BLOGROLL

- PALM BEACH LIVE WORK PLAY
- COP TALK RADIO
- >> WATERFRONT PROPERTIES
- EYESONNEWS
- RANDOM PIXELS
- >>FRANKEL REALTY GROUP
- THE NEWSBLASTER
- MIAMI HERALD
- BROWARD BEAT

GOT GOSSIP? CALL US!



Got news for Jose? 561-801-0893!

West Palm Beach commissioner says no conflict in HUD talk but received \$2,500

Posted: 5:44 p.m. Wednesday, Sept. 10, 2014

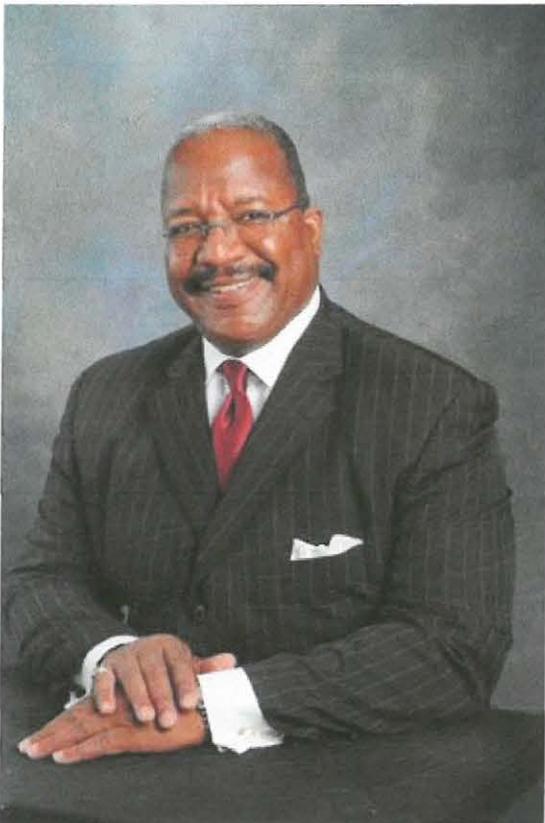
Email Facebook Twitter ShareThis New

By [Pat Beall](#) and [Eliot Kleinberg](#) - Palm Beach Post Staff Writers

WEST PALM BEACH —

Tucked away in West Palm Beach's multimillion tussle with HUD over spending by a city-financed housing firm is a long-ago payment: \$2,500 to its attorney, Keith James.

When the city discussed the HUD money at a recent meeting, James, now a city commissioner, participated and later told The Palm Beach Post the issue didn't pose a conflict.

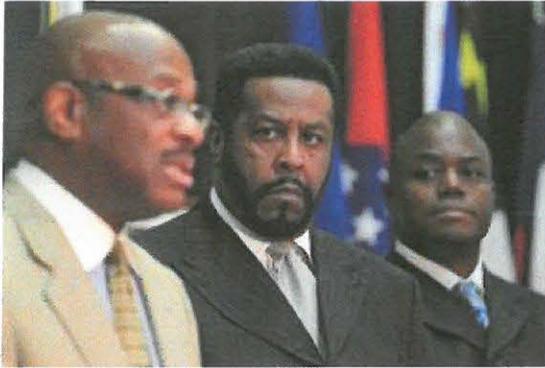


West Palm Beach City Commissioner Keith James

James received the money from Redemptive Life Fellowship Urban Corp., whose spending is at the heart of the city's proposed \$1.46 million settlement with HUD. The city, which gave the federal money to Redemptive, could not find documentation to justify all of the group's spending.

As early as 2011, a [city review](#) singled out payments to 16 commercial vendors and asked Redemptive to prove the money was paid according to HUD rules.

James' \$2,500 was among them.



Bishop Harold Ray (center) and Earl W. Hamilton (right) look on as Stuart attorney Willie Gary addresses the media in 2012. ... [Read More](#)

The city announced last month that it still cannot find all the documents.

Redemptive paid James to clear up some title “blemishes” on three properties the city donated for housing, James said, work that predated his March 2011 election to the commission.

And, said James, he would “absolutely” repay the city the \$2,500 if that’s what it takes to remove the perception of a conflict of interest.

Mayor Jeri Muoio said that’s not needed. “Should he give back the money? I think he earned it fair and square,” she said Wednesday. “He did work for them. I think the onus of an explanation and information rests on Redemptive Life.”

James, when asked if he should have disclosed the Redemptive payment during a Sept. 2 commission meeting when the HUD repayment was discussed, said no. The commission voted only to find other sources for repaying the HUD money, he pointed out. There was no vote about Redemptive.

If it came down to a vote to push Redemptive to repay money, “I would disclose the fact that I had been paid by them and probably abstain,” James told The Post this week. “I would consult with our ethics officer, but I think the appropriate thing would be to abstain.”

The Harvard-trained lawyer’s ties go beyond money. James is a longtime member of Redemptive Life Fellowship church, which created the housing nonprofit. James also has a longstanding business relationship with the church: He was the corporate registered agent for Redemptive Life Fellowship church as early as 1995. He still is. And over the years, James has been a registered agent for other companies linked to the church or its founder, Bishop Harold Ray.

James said he has never been paid to be a registered agent.

Ray is a director of the Redemptive housing company at the center of the proposed \$1.46 million payback. The city provided HUD money to Redemptive, mainly between 2004 and 2006, to build homes in the struggling Coleman Park area.

[West Palm Beach: We'll replace lost federal housing money](#)

[West Palm Beach offers to settle \\$3 million HUD demand](#)

[HUD gives West Palm 30 days to explain or repay \\$1.3 million](#)

[HUD asks West Palm Beach to pay back \\$3M](#)

No one doubts Redemptive built homes. But the city's housing department couldn't find certain documents proving the money went where it was supposed to go. HUD's inspector general, who last year looked at how the city was spending housing money, also wrote that the city has not been able to substantiate that Redemptive money always was spent appropriately.

And, a city consulting firm — Community Redevelopment Associates — reviewed the files and expressed concern over conflicts of interest.

The consultants singled out former Redemptive directors who also were directors of Tram Ventures. Tram did business as Dominion Realty, and Dominion handled multiple real estate transactions for Redemptive, consultants said. According to a city housing department review, one of those directors received more than \$110,000 from Redemptive real estate deals.

Tram's registered agent was Keith James from 1997 through 2003.

Redemptive has emphatically denied it did anything wrong. "We're not saying we're squeaky clean on some oversights, and there might have been some sloppy stuff here and there, but it's just totally unfair for us to be hit like we have stolen funds," Ray told The Post in 2012. He could not be reached Wednesday.

That same year, an attorney working for Ray told The Post that Redemptive had provided the city with all the records and documentation needed.

Last month, though, Muoio acknowledged that some city housing records are missing. Without them, the city can't prove money was spent correctly. HUD wants \$3 million back.

At last week's meeting, Commissioner Kimberly Mitchell questioned why the city could be stuck with the bill, when it was an outside business spending the money. City Administrator Jeff Green responded that, "ultimately, HUD will hold the city responsible for that money."

West Palm has offered to settle the case for \$1.46 million, which could be deducted from future HUD housing allocations to the city.

That would mean less HUD money for future low and moderate income housing, raising complaints from commissioners.

HUD hasn't yet said it would even accept the city's offer, however, and commissioners, including James, voted against shaving HUD money needed for low-income neighborhoods. Muoio hasn't ruled out dipping into the city's reserves for the money so low-income residents aren't forced to pay the tab.

"We're going to pay it," she said. After three years of back and forth with HUD, "We want to get it cleaned up. We just want to get it behind us."

It's not at all clear the nonprofit would be able to help. According to income tax returns, Redemptive's housing venture was \$438,559 in the red in 2011 and had no income.

It does, however, have half a dozen parcels of vacant land worth \$51,570: According to county property records, Redemptive bought all six from West Palm Beach, five in 2007 and one in 2010, for a combined \$60.

WHAT THE POST FOUND

In 2012, The Post revealed that the city used federal dollars to pay twice for four vacant lots with its partner, Redemptive Life Fellowship Urban Initiative Corp. In spring, The Post showed how city consultants altered or botched documents to get federal housing money. The city fired the consultants.

Editorial: Deal would let West Palm Beach off hook for housing mess

Posted: 4:03 p.m. Monday, Sept. 8, 2014

Email Facebook Twitter ShareThis New

West Palm Beach city officials are clearly hoping they can make a protracted housing department scandal go away by offering to “repay” HUD a penalty settlement of \$1.46 million — deducted from future HUD grants.

To underscore its wish that the problem disappear, the city’s spokesman, Elliot Cohen, issued a press release titled, “City Proposes Final Solution to Long Running Housing Inquiry.”



A house at 1010 22nd Street was one slated to be refurbished through the City of West Palm Beach Housing & ...
[Read More](#)

As proposed, the working poor in need of affordable housing would have been the only ones penalized by this “solution.” As the Post’s Eliot Kleinberg reported, city commissioners recognized the rub, and voted last week to require that housing be funded from other sources if HUD accepts the city’s penalty offer.

While that’s a better plan than the city’s first proposal to the federal agency, it’s still unacceptable to taxpayers, because it lifts the pressure to hold those responsible accountable.

West Palm Beach has yet to adequately explain to taxpayers how it could distribute over \$4 million in affordable housing grants to community groups, signing check after check, without assuring proper invoices and paperwork were there, showing precisely which payments were made for which work and supplies on which houses and lots. Or why, when the [city hired a company to clean up the mess](#), the “cleanup” company nearly failed to spend the needed housing money, and then possibly fudged paperwork to make it appear it had met its obligations by deadline.

The U.S. Department of Housing and Urban Development owes it to taxpayers here and across the United States to refuse to send taxpayer money to an agency unable to prove its fiscal house is in order.

Confidence wasn't exactly bolstered last week when news broke that the city had asked its finance director, a former securities trader, to resign for a resume misstatement that helped hide the fact that she had been barred from trading "in any capacity" by the National Association of Securities Dealers.

Unfortunately, should HUD reject the city's proposal, it will mean the city must repay the housing penalty out of general revenues. In other words, West Palm Beach taxpayers will be on the hook for this fiscal mess, and they have every right to be angry about it.

The city told HUD the contractor that actually built the homes is now out of business, making the further documentation impossible. That company may be out of business, but the individuals responsible in most cases are still here. Taxpayers deserve to be made as whole as possible. If the city's partners failed to meet their contractual obligations, then the city must take them to court.

The statute of limitations for breach of contract is five years, so the clock is ticking.

Having the administrators responsible for this mess forced to testify under oath about what really happened would be an antidote to the see-no-evil mentality long pervading City Hall. Former Mayor Lois Frankel, now a member of Congress, is among those who still hasn't adequately explained what happened at the department under her watch.

Above all, the city must prove to taxpayers that it has in place proper contracting, bookkeeping and accounting policies and procedures — ones that incorporate best practices, along with truly independent auditing oversight.

Quality low-income housing for working poor families is in short supply. The city's failure to manage HUD dollars carefully isn't just an insult to taxpayers — it's an injury to the city's working poor.

Finding No. 4:

Ineligible uses of CHDO Proceeds/Program Income (Exhibit C).

The City of West Palm Beach, at its discretion, permitted the CHDO to retain funds realized from any increase in value of the HOME funds as CHDO Proceeds. All funds retained by RLUIC must be utilized for HOME eligible housing activities that benefit low-income families pursuant to 24 CFR Part 92.300(a)(2). The proposed use of such proceeds must be identified by RLUIC and approved by the HCD/ECD Director and/or the City Commission as further described in Section 3.03 of Phase I Agreement Addendum and Section 5.11 of Phase II Agreement.

To date, RLUIC has not formally requested permission to re-use the CHDO Proceeds/Program Income. RLUIC has, however, submitted various bank statements detailing the transactions from March 2005 to December 2006.

Corrective Action:

The following bank statements must be submitted to HCD for review within 30 days: September 2005 – November 2005, January 2006 – May 2006, January 2007 – September 2010.

Additionally, the following transactions must be documented as HOME eligible housing activities that benefit low-income families pursuant to 24CFR Part 92.300(a)(2) or re-paid to the City of West Palm Beach:

1) North American Construction	\$1,031,397.46
2) BB and T Commitment Fees	\$ 5,340.00
3) Redemptive Life Fellowship	\$ 741,568.92
4) Landmark Surveying & Mapping	\$ 4,777.50
5) Land Design South	\$ 52,308.06
6) Laing Surveying	\$ 1,695.00
7) US Treasury Penalties and Fees	\$ 445.92
8) University of Ft. Lauderdale Contributions	\$ 5,000.00
9) Willie Moore Maintenance	\$ 1,000.00
10) Pamela K Speer	\$ 17,948.49
11) Atlantis Air Conditioning	\$ 5,538.00
12) Rental Reimbursement (RLUIC)	\$ 40,000.00
13) In Kind International	\$ 4,350.00
14) Restoration Travel	\$ 1,050.80
15) Schwab, Twitty, and Haser	\$ 105,000.00
16) Kimley-Horn and Associates	\$ 23,159.85
17) Keith James	\$ 2,500.00
18) Payroll & Taxes	\$ 97,464.66
19) Coleman Park Marketing Assistance	\$ 2,000.00
20) Palm Beach County School Board	\$ 1,390.04
21) Panser Troutman Consulting	\$ 4,490.00
22) PM Surveying	\$ 1,714.90

LAW OFFICE
KEITH A. JAMES

N96000005489
FILED

96 OCT 24 PM 2:40
SECRETARY OF STATE
TALLAHASSEE, FLORIDA

October 23, 1996

VIA OVERNIGHT MAIL

Department of State
Division of Corporations
409 East Gaines Street
Tallahassee, Florida 32399

000001985280--5
-10/24/96--01055--014
****122.50 ****122.50

RE: **KINGDOM DOMINION NETWORK, INC.**

Dear Sirs:

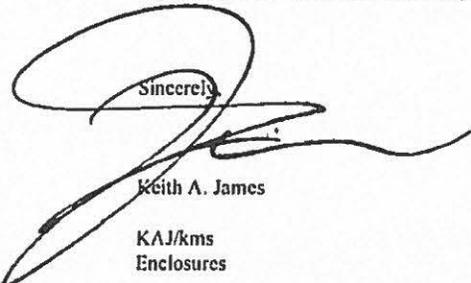
Enclosed please find the original and one copy of the Articles of Incorporation for the above-named corporation, together with this firm's check in the amount of \$122.50, representing payment for the following expenses:

Filing Fee	\$ 35.00
Registered Agent Fee	35.00
Certified Copy	<u>52.50</u>
Total	\$122.50

Please return the certified copy to this office at your earliest convenience.

If you should have any questions or require additional information, please do not hesitate to contact the undersigned.

Sincerely,



Keith A. James

KAJ/kms
Enclosures

cc: Bishop Harold Calvin Ray (with enclosure)

PK
10/25/96

KEITH A. JAMES, P.A.
1655 Palm Beach Lakes Blvd., Suite 810
West Palm Beach, Florida 33401
Phone (561) 686-4500 • Fax (561) 684-1508

FILED

**ARTICLES OF INCORPORATION
OF
KINGDOM DOMINION NETWORK, INC.**

96 OCT 24 PM 2:40

SECRETARY OF STATE
TALLAHASSEE, FLORIDA

The undersigned, acting as incorporator of a Florida corporation under the Florida Business Corporation Act, Chapter 617 of the Florida Statutes (the "Florida Not for Profit Corporation Act"), hereby adopts the following Articles of Incorporation for such Corporation:

ARTICLE I

NAME

The name of the Corporation is **KINGDOM DOMINION NETWORK, INC.**

ARTICLE II

DURATION

The Corporation shall have perpetual existence.

ARTICLE III

PRINCIPAL PLACE OF BUSINESS AND MAILING ADDRESS

The principal place of business and mailing address of the Corporation shall be 2101 Australian Avenue, West Palm Beach, Florida 33407.

ARTICLE IV

**CORPORATION NOT-FOR-PROFIT
AND CHARITABLE PURPOSES**

The Corporation shall be a corporation not-for-profit under the provisions of Florida law. It shall be organized, and at all times thereafter operated, exclusively for public charitable uses and purposes within the meaning of Section 501 (c)(3) of the Internal Revenue Code. In furtherance of such charitable uses and purposes, the Corporation shall (i) provide an organizational mechanism for the association of independent churches of various denominational affiliations for the greater purpose of engendering coordinated and synergistic spiritual, charitable, educational and socioeconomic community development initiatives in local communities throughout the continental United States and in foreign countries, and (ii) provide a meaningful mechanism for spiritual fellowship among Christian ministries according to the scriptural exhortation of the Book of Acts.

The Corporation shall serve only such purposes and functions and shall engage only in such activities as are consistent with the purposes set forth in this Article IV, and as are exclusively charitable and are entitled to charitable status under Section 501 (c)(3) of the Internal Revenue Code, as may be prescribed from time to time by the Board of Trustees of the Corporation.

ARTICLE V

TAX-EXEMPT NOT-FOR-PROFIT CORPORATION

The Corporation shall be a corporation not-for-profit and shall be neither organized nor operated for pecuniary gain or profit.

(a) No part of the net earnings of the Corporation shall inure to the benefit of, or be distributable to, any member, trustee, officer, or director of the Corporation, or any other private

person; but the Corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes as set forth in Article IV hereof.

(b) The Corporation shall not carry on propaganda, or otherwise attempt to influence legislation, to an extent that would disqualify it for tax exemption under Section 501 (c)(3) of the Internal Revenue Code by reason of attempting to influence legislation. The Corporation shall not participate in, or intervene in (including the publication or distribution of statements) any political campaign on behalf of any candidate for public office.

(c) Notwithstanding any other provisions of these Articles of Incorporation, the Corporation shall not carry on any other activities not permitted to be carried on:

(i) By a corporation exempt from federal income taxation under Section 501 (c)(3) of the Internal Revenue Code; or

(ii) By a corporation, contributions to which are deductible for federal income tax purposes under Section 170 (c)(1) or (2) of the Internal Revenue Code, for federal estate tax purposes under Section 2055 (n)(1) or (2) of the Internal Revenue Code, and for federal gift tax purposes under Section 2522 (a)(1) or (2) of the Internal Revenue Code.

It is intended that the Corporation shall have, and continue to have, the status of an organization which is exempt from federal income taxation under Section 501 (c)(3) of the Internal Revenue Code. All terms and provisions of these Articles of Incorporation and the Bylaws of the Corporation, and all authority and operations of the Corporation, shall be construed, applied and carried out in accordance with such intent.

ARTICLE VI

NO MEMBERS

The Corporation shall have no members.

ARTICLE VII

INITIAL REGISTERED OFFICE AND REGISTERED AGENT

The street address of the initial registered office of the Corporation is 1655 Palm Beach Lakes Boulevard, Suite 810, Tower C, West Palm Beach, Florida 33401. The name of the initial registered agent of the Corporation at that address is KEITH A. JAMES.

ARTICLE VIII

BOARD OF TRUSTEES

The Board of Trustees shall have general charge of the affairs and any property and assets of the Corporation. It shall be the duty of the Trustees to carry out the purposes and functions of the Corporation. The Trustees shall be elected in accordance with the Bylaws of the Corporation, and shall have the powers and duties set forth in these Articles of Incorporation and in the Bylaws, to the extent that such powers and duties are not inconsistent with the status of the Corporation as a corporation not-for-profit which is exempt from federal income taxation under Section 501 (c)(3) of the Internal Revenue Code. The initial members of the Board of Trustees of the Corporation shall be as follows:

Name:	Address:
1. DONALD MINOR	361 West 24th Street Riviera Beach, FL 33404
2. BRENDA RAY	11771 Littlestone Court West Palm Beach, FL 33412
3. HAROLD CALVIN RAY	11771 Littlestone Court West Palm Beach, FL 33412

ARTICLE IX

DEFINITIONS

For purposes of these Articles of Incorporation, "charitable purposes" include charitable, educational, literary, scientific, or medical purposes within the meaning of Section 501 (c)(3) of the Internal Revenue Code, contributions for which are deductible under Section 170 (c)(1) or (2), Section 2055 (a) (1) or (2), and Section 2522 (a)(1) or (2) of the Internal Revenue Code. All references in these Articles of Incorporation to sections of the Internal Revenue Code shall be considered references to the Internal Revenue Code of 1986, as from time to time amended, and to the corresponding provisions of any applicable future United States Internal Revenue Law, and to all regulations issued under such sections and provisions.

ARTICLE X

LIMITATION OF TRUSTEE LIABILITY

(a) A trustee of the Corporation shall not be personally liable to the Corporation or to any other person for monetary damages for breach of duty of care or other duty as a trustee, or for any

statement, vote, decision, or failure to act, regarding corporate management or policy, regardless of when such breach, statement, vote, decision, or failure to act may have occurred, except for liability under the provisions of Section 607.0831 of the Florida Statutes.

(b) Any repeal or modification of the provisions of this Article shall be prospective only, and shall not adversely affect any limitation on the personal liability of a trustee of the Corporation with respect to any act or omission occurring prior to the effective date of such repeal or modification.

(c) If Florida law hereafter is amended to authorize the further elimination or limitation of the liability of trustees, then the liability of a trustee of the Corporation, in addition to the limitation on personal liability provided herein, shall be limited to the fullest extent permitted by the amended Florida law.

(d) In the event that any of the provisions of this Article (including any provision within a single sentence) are held by a court of competent jurisdiction to be invalid, void, or otherwise unenforceable, the remaining provisions are severable and shall remain enforceable to the fullest extent permitted by law.

ARTICLE XI

INDEMNIFICATION

The Corporation shall indemnify any member of the Board of Trustees or officer or former member of the Board of Trustees or former officer and shall advance and bear expenses and costs (including attorneys' fees) actually and necessarily incurred by him or her in connection with any claim asserted, by reason of such person being or having been a member of the Board of Trustees

or officer of the Corporation, to the fullest extent permitted by the Florida Not-For-Profit Corporation Act. By resolution of the Board of Trustees or in the Bylaws of the Corporation, the Corporation may similarly indemnify and advance and bear expenses and costs of employees and agents of the Corporation with respect to activities within the scope of their services to the Corporation. The Corporation may purchase insurance on such terms as the Board of Trustees may approve insuring trustees and officers against such claims.

ARTICLE XII

AMENDMENTS

These Articles of Incorporation may be amended at any time and from time to time by the affirmative vote of no fewer than two-thirds (2/3) of all of the trustees then in office.

ARTICLE XIII

INCORPORATOR

The name and street address of the incorporator is as follows:

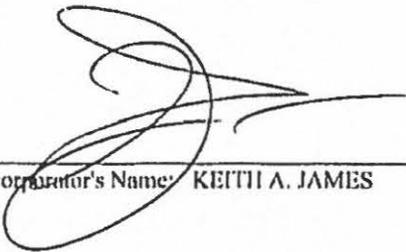
Name:

KEITH A. JAMES

Address:

1655 Palm Beach Lakes Boulevard
Suite 810, Tower C
West Palm Beach, FL 33401

IN WITNESS WHEREOF, the undersigned has executed these Articles of Incorporation
this 23rd day of October, 1996.

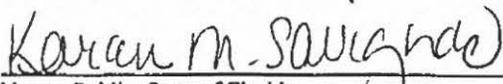

Incorporator's Name: KEITH A. JAMES

STATE OF FLORIDA
COUNTY OF PALM BEACH

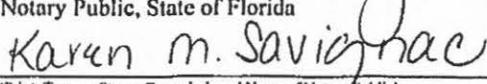
The foregoing Articles of Incorporation were acknowledged before me this 23rd day of
October, 1996, by KEITH A. JAMES, who:

is personally known to me; or

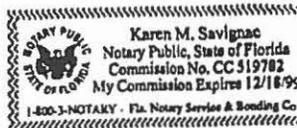
has produced identification: _____



Notary Public, State of Florida



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



FILED

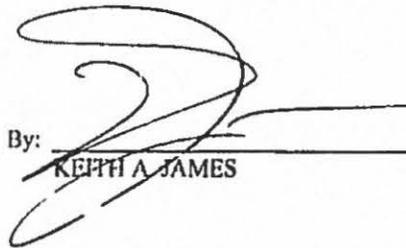
96 OCT 24 PM 2:41

SECRETARY OF STATE
TALLAHASSEE, FLORIDA

ACCEPTANCE OF DESIGNATION AS REGISTERED AGENT

I, KEITH A. JAMES, am familiar with and accept the obligations of the appointment as the initial registered agent of **KINGDOM DOMINION NETWORK, INC.**, as made in the foregoing Articles of Incorporation.

DATED this 23RD day of October, 1996.

By: 

KEITH A. JAMES



Detail by Entity Name

Florida Non Profit Corporation

KINGDOM DOMINION NETWORK, INC.

Filing Information

Document Number	N96000005489
FEI/EIN Number	650703834
Date Filed	10/24/1996
State	FL
Status	ACTIVE

Principal Address

2101 AUSTRALIAN AVE
WEST PALM BEACH, FL 33407

Mailing Address

2101 AUSTRALIAN AVE
WEST PALM BEACH, FL 33407

Registered Agent Name & Address

JAMES, KEITH A
4510 PORTOFINO WAY
SUITE 209
WEST PALM BEACH, FL 33409

Address Changed: 04/30/2007

Officer/Director Detail

Name & Address

Title D

RAY, BRENDA
11771 LITTLESTONE CT
WEST PALM BEACH, FL 33412

Title D

RAY, HAROLD C
11771 LITTLESTONE CT
WEST PALM BEACH, FL 33412

Annual Reports

Report Year	Filed Date
2012	04/30/2012

2014

05/01/2014

Document Images

<u>05/01/2014 -- ANNUAL REPORT</u>	View image in PDF format
<u>04/30/2013 -- ANNUAL REPORT</u>	View image in PDF format
<u>04/30/2012 -- ANNUAL REPORT</u>	View image in PDF format
<u>05/01/2011 -- ANNUAL REPORT</u>	View image in PDF format
<u>05/03/2010 -- ANNUAL REPORT</u>	View image in PDF format
<u>04/30/2009 -- ANNUAL REPORT</u>	View image in PDF format
<u>04/30/2008 -- ANNUAL REPORT</u>	View image in PDF format
<u>04/30/2007 -- ANNUAL REPORT</u>	View image in PDF format
<u>05/01/2006 -- ANNUAL REPORT</u>	View image in PDF format
<u>04/26/2005 -- ANNUAL REPORT</u>	View image in PDF format
<u>04/28/2004 -- ANNUAL REPORT</u>	View image in PDF format
<u>05/01/2003 -- ANNUAL REPORT</u>	View image in PDF format
<u>05/27/2002 -- ANNUAL REPORT</u>	View image in PDF format
<u>05/11/2001 -- ANNUAL REPORT</u>	View image in PDF format
<u>05/16/2000 -- ANNUAL REPORT</u>	View image in PDF format
<u>05/06/1999 -- ANNUAL REPORT</u>	View image in PDF format
<u>10/14/1998 -- ANNUAL REPORT</u>	View image in PDF format
<u>05/20/1997 -- ANNUAL REPORT</u>	View image in PDF format
<u>10/24/1996 -- DOCUMENTS PRIOR TO 1997</u>	View image in PDF format

2014 FLORIDA NON PROFIT CORPORATION ANNUAL REPORT

**FILED
May 01, 2014
Secretary of State
CC1161233987**

DOCUMENT# N96000005489

Entity Name: KINGDOM DOMINION NETWORK, INC.

Current Principal Place of Business:

2101 AUSTRALIAN AVE
WEST PALM BEACH, FL 33407

Current Mailing Address:

2101 AUSTRALIAN AVE
WEST PALM BEACH, FL 33407

FEI Number: 65-0703834

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

JAMES, KEITH A
4510 PORTOFINO WAY
SUITE 209
WEST PALM BEACH, FL 33409 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE:

Electronic Signature of Registered Agent

Date

Officer/Director Detail :

Title D
Name RAY, BRENDA
Address 11771 LITTLESTONE CT
City-State-Zip: WEST PALM BEACH FL 33412

Title D
Name RAY, HAROLD C
Address 11771 LITTLESTONE CT
City-State-Zip: WEST PALM BEACH FL 33412

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: HAROLD C RAY

D

05/01/2014

Electronic Signature of Signing Officer/Director Detail

Date

PALM BEACH COUNTY COMMISSION ON ETHICS
MEMORANDUM OF INQUIRY

To: Steven Cullen, Executive Director
From: Anthony C. Bennett, Investigator
Re: C14-009 - Keith James, Commissioner, West Palm Beach

- **Background**

This matter came to the attention of the Commission on Ethics (COE) staff via a sworn complaint filed by Alex Augustin, 401 North Rosemary, West Palm Beach, FL 33401 on September 15, 2014. The Complaint was properly notarized and hand delivered to the Commission on Ethics (COE) office via courier the same date. The Complaint listed Commissioner Keith James, 401 Clematis, West Palm Beach, FL 33401 as Respondent.

Attached to the sworn Complaint was a letter dated September 14, 2014. The letter was addressed to "Palm Beach County Commission on Ethics." The Complainant states Respondent is listed as the "Registered Agent" of Redemptive Life Fellowship, Inc. located at 2101 Australian Avenue, West Palm Beach, Florida 33407. The letter was signed by the Complainant and stated: "This letter, along with supporting documentation, will serve as a formal ethics complaint on West Palm Beach City Commissioner Keith James."

The letter alleged that on September 2, 2014 at the City of West Palm Beach City Commission meeting, Respondent voted on a matter related to a proposed settlement between the City of West Palm Beach and the U.S. Department Housing and Urban Development (HUD). Complainant alleges the vote was related to work performed by Redemptive Life Fellowship and as the listed Registered Agent of Redemptive Life Fellowship, Inc., Respondent should have either disclosed the relationship and/or abstained from voting.

The following documents were provided with the Complaint and submitted to the file:

- **Documents provided by Complainant**

1. Letter addressed to the COE signed by Complainant. (2 pages)
2. Florida SUNBIZ Non-Profit Corporation Annual Reports from the years: 1995-2014. (24 pages)
3. Gossip Extra Newspaper Article: *WPB Scandal: City Commissioner Has Business Ties With Church Under Scrutiny!*; dated 12/5/2011 (2 pages)
4. Palm Beach Post Article: *West Palm Beach commissioner says no conflict in HUD talk but received \$2,500*; dated 9/10/2014. (4 pages)
5. Palm Beach Post Editorial: *Deal would let West Palm Beach off hook for housing mess*; dated 9/8/2014. (2 pages)
6. Copies of Articles of Incorporation Documents for Kingdom Dominion Network, Inc. (filed 10/24/1996)
7. Acceptance of Designation as Registered Agent document signed by Keith A. James (filed 10/24/1996)
8. Florida Department of State Division of Corporations document listing Kingdom Dominion Network, Inc. as a Florida Non Profit Corporation.
9. Redemptive Life Monitoring document (dated 8/2/2011) listing a payment to Keith James in the amount of \$2,500.00 under item 17.

- **Applicable Law**

The Following sections of the PBC Commission on Ethics Ordinance are relevant:

Sec. 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 county lobbyist registration ordinance, and the county post-employment ordinance... (Emphasis added)

Sec. 2-260. Procedure on Complaints filed.

(a) *Filing of complaints.*

(1) Any person may file a complaint with the commission on ethics.

(b) *Legal sufficiency of complaints.*

(1) In order to be found legally sufficient, complaints filed by persons under section (a) 1 above, must:

- a. Be in writing, and executed on a form prescribed by the commission on ethics;
- b. Allege the elements of a violation within the commission on ethics' jurisdiction in the complaint and/or supporting documents provided;
- c. Be based substantially upon the personal knowledge of the complainant; and
- d. Be signed under oath or affirmation by the complaining person.

The following portions of the PBC Code of Ethics ordinance are relevant:

Section 2-442. Definitions.

Official or employee means ***any official or employee of the county or the municipalities located within the county***, whether paid or unpaid. The term "*employee*" includes but is not limited to all managers, department heads and personnel of the county or the municipalities located within the county... The term "official" shall mean members of the board of county commissioners, *a mayor*, members of local municipal governing bodies, and members appointed by the board of county commissioners, members of local municipal governing bodies or mayors or chief executive officers that are not members of local municipal governing body, as applicable, to serve on any advisory, quasi judicial, or any other board of the county, state, or any other regional, local, municipal, or corporate entity. (Emphasis added)

Outside employer or business includes:

- (1) Any entity, other than the county, the state, or any other federal, regional, local, or municipal government entity, of which the official or employee is a member, official, director, proprietor, partner, or employee, and from which he or she receives compensation for services rendered or goods sold or produced. For purposes of this definition, "compensation" does not include reimbursement for necessary expenses, including travel expenses; or
- (2) Any entity located in the county or which does business with or is regulated by the county or municipality as applicable, in which the official or employee has an ownership interest.

Customer or client means any person or entity to which an official or employee's outside employer or business has supplied goods or services during the previous twenty-four (24) months, having in the aggregate, a value greater than ten thousand dollars (\$10,000).

Financial benefit includes any money, service, license, permit, contract, authorization, loan, travel, entertainment, hospitality, gratuity, or any promise of any of these, or anything else of value.

Sec. 2-443. Prohibited conduct.

- (a) ***Misuse of public office or employment.*** An official or employee shall not use his or her official position or office, or take or fail to take any action, or influence others to take or fail to take any action, in a manner which he or she knows or should know with the exercise of reasonable care will result in a special financial

benefit, not shared with similarly situated members of the general public, for any of the following persons or entities:

- (1) Himself or herself;
 - (5) A customer or client of the official or employee's outside employer or business;
- (b) **Corrupt misuse of official position.** An official or employee shall not use his or her official position or office, or any property or resource which may be within his or her trust, to corruptly secure or attempt to secure a special privilege, benefit, or exemption for himself, herself, or others. For the purposes of this subsection, "corruptly" means done with a wrongful intent and for the purpose of obtaining, or compensating or receiving compensation for, any benefit resulting from some act or omission of an official or employee which is inconsistent with the proper performance of his or her public duties.
- (c) **Disclosure of voting conflicts.** County and municipal officials as applicable shall abstain from voting and not participate in any matter that will result in a special financial benefit as set forth in subsections (a)(1) through (7). The official shall publicly disclose the nature of the conflict and when abstaining from the vote, shall complete and file a State of Florida Commission on Ethics Conflict Form 8B pursuant to the requirements of Florida Statutes, §112.3143. Simultaneously with filing Form 8B, the official shall submit a copy of the completed form to the county commission on ethics. Officials who abstain and disclose a voting conflict as set forth herein, shall not be in violation of subsection (a), provided the official does not otherwise use his or her office to take or fail to take any action, or influence others to take or fail to take any action, in any other manner which he or she knows or should know with the exercise of reasonable care will result in a special financial benefit, not shared with similarly situated members of the general public, as set forth in subsections (a)(1) through (7).

- **Analysis**

For this complaint to be legally sufficient, the following must be applied:

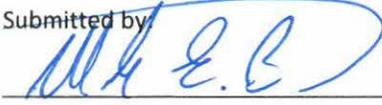
1. The complaint must be regarding an individual who is within the jurisdiction of the Commission on Ethics and the Palm Beach County Code of Ethics.
 - a. Respondent is an elected City Commissioner for the City of West Palm Beach, and thus is under the jurisdiction of the PBC Code of Ethics and the PBC Commission on Ethics.
2. The complaint filed must be in writing and executed on a form prescribed by the COE.
 - a. This complaint was submitted on a Complaint form used by the COE and signed by Alex Augustin.
3. The complaint must allege the elements of a violation within the jurisdiction of the COE with supporting documents provided.
 - a. The complainant has alleged that Keith James misused his official position or office, taking or failing to take action, or influenced others to take or fail to action, in a manner which he knew or should have known would result in a special financial benefit to himself or a customer or client of his outside business in violation of §2-443(a).
 - b. The complainant has also alleged that Keith James corruptly misused his official position or office by the actions listed in a. above with wrongful intent and for the purpose of obtaining or compensating a benefit that resulted from an act or omission, which was inconsistent with the proper performance of his public duties in violation of §2-443(b).
 - c. Finally, the complainant alleged that Keith James had a voting conflict and failed to disclose the conflict and participated in a matter that resulted in a special financial benefit to himself and/or a customer or client of his outside business in violation of §2-443(c).
 - d. The complainant submitted several documents in support of the violations alleged. Said documents are listed by name above.
4. The complaint must be based substantially on the personal knowledge of Alex Augustin.
 - a. The documents submitted by Mr. Augustin indicate he has personal knowledge of the allegations listed above.

5. The complaint must be signed under oath or affirmation by the complaining person.
 - a. Alex Augustin's signature was notarized by a Notary Public for the State of Florida on September 15, 2014.

- **Recommendation**

After reviewing the background information, the documents submitted by Alex Augustin, the applicable law and making the analysis, I believe that a violation of the Code of Ethics could be found if any of the allegations are true and committed by the Respondent. Therefore, it is my recommendation that a finding of **LEGAL SUFFICIENCY** is made and a formal investigation be opened.

Submitted by:

for  *MARK E. BARBOUR*

Anthony C. Bennett
PB County Commission on Ethics

9/26/2014
Date

Reviewed by:

SC
(Initials)

9/26/2014
Date

PALM BEACH COUNTY COMMISSION ON ETHICS
LEGAL SUFFICIENCY DETERMINATION

To: File
From: Steven P. Cullen, Executive Director
Re: C14-009 – Keith James, Commissioner, West Palm Beach

- **Background**

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The letter alleged that on September 2, 2014 at the City of West Palm Beach City Commission meeting, Respondent voted on a matter related to a proposed settlement between the City of West Palm Beach and the U.S. Department Housing and Urban Development (HUD). Complainant alleges the vote was related to work performed by Redemptive Life Fellowship and as the listed Registered Agent of Redemptive Life Fellowship, Inc., Respondent should have either disclosed the relationship and/or abstained from voting.

- **Finding**

Based on the information listed in both the Complaint and the Memorandum of Inquiry, there is **LEGAL SUFFICIENCY** for further investigation of this Complaint to be undertaken.

Legal sufficiency exists where there is an allegation of a violation of an ordinance within the jurisdiction of the Ethics Commission, purportedly committed by an individual within the authority of the Ethics Commission, based substantially on the personal knowledge of the Complainant, relating to an alleged violation occurring after the effective date of the code, and filed with the Ethics Commission within two years of the alleged violation.

If true and Respondent violated the Code of Ethics by committing any of the alleged unlawful acts of §2-443(a), *Misuse of public office or employment*, §2-443(b), *Corrupt misuse of official position*, or §2-443(c), *Disclosure of voting conflicts* were committed then the Commission could find Probable Cause.

BY:



Steven P. Cullen, Executive Director
Florida Bar No. 362204
PBC Commission on Ethics

9/26/2014

Date

INVESTIGATIVE REPORT

To: Steven Cullen, Executive Director
From: Anthony C. Bennett, Investigator
Re: C14-009 - Keith James, Commissioner, West Palm Beach

All information from the Memorandum of Inquiry, supporting documents and Legal Sufficiency Determination are incorporated by reference into this Investigation.

- **Allegation:**

This matter came to the attention of the Commission on Ethics (COE) staff via a sworn complaint filed by Alex Augustin, 401 North Rosemary, West Palm Beach, FL 33401 on September 15, 2014. The Complaint was properly notarized and hand delivered to the Commission on Ethics (COE) office via courier the same date. The Complaint listed Commissioner Keith James, 401 Clematis, West Palm Beach, FL 33401 as Respondent.

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- **Investigation:**

Redemptive Life Fellowship Urban Initiative Corporation (RLFUIC) entered into a contract with the City of West Palm Beach to receive funds from the U.S. Department of Housing and Urban Development, through the City, to build affordable housing in the Coleman Park area of West Palm Beach Florida under a Community Housing and Development Organization (CHDO) program. According to the Complainant, in 2011 the City had concerns regarding the contributions made from HUD through the City CHDO program, which then transferred the funds to Redemptive Life Fellowship Urban Initiative Corporation. The City contacted HUD and requested an audit.

HUD performed an audit on August 2, 2011, and found there were discrepancies in the reporting of payments made by RLFUIC to various entities. One document in particular titled "***Redemptive Life Monitoring,***" page 5 of 11 under Finding No. 4 - Item number 17, has a listing of Keith James receiving a payment in the amount of \$2,500.00. It does not give the reason as to why this payment was made.

Based on this audit, HUD required the City of West Palm Beach to pay back monies they received through the program.

On Thursday September 18, 2014, I called the Administrative Offices of Redemptive Life Fellowship Inc.

I spoke with a receptionist, who took my information and advised Bishop Ray and Mrs. Ray were out of town. She also stated that inquiries regarding this issue were being handled by the attorney for the church. She told me the attorney is Ms. Elaine Johnson-James and provided contact information. I called Ms. Johnson-James, of the Berger/Singerman Law Firm, and left a message.

On Thursday, September 18, 2014, I spoke via telephone with Ms. Elaine Johnson-James, attorney for Bishop Harold C. Ray, Brenda Ray, and Redemptive Life Fellowship Inc.

Ms. Johnson-James advised that she was the attorney of record for Bishop Harold C. Ray, Brenda Ray and Redemptive Life Fellowship, Inc. She also disclosed that Respondent is her ex-husband. She stated Respondent joined Redemptive Life Fellowship in 1991 and has been an active member for 20 plus years. She said Respondent is an attorney and has done some legal work for the church from the 1990s through the early 2000s. She advised that much of the work performed was more advisory and Respondent neither charged the church nor the Rays.

The only time she could recall Respondent getting "paid" for services was in the early 2000's and the amount "paid" to him was somewhere between \$2000 and \$3000. She wasn't sure of the exact amount. She said the work was surrounding a title issue that Respondent worked on in the Coleman Park area of West Palm Beach, Florida. She stated this work was done well before he was elected as a City Commissioner for West Palm Beach.

As the attorney of record, Ms. Johnson-James said she would know if other work was performed for the church by any other attorney. She said Respondent has not performed any work for the church nor any of their entities since becoming an elected official. When asked about Respondent's role as "Registered Agent" as listed in the church's corporate documents, she said that was an apparent oversight by the church and it had been cleared up. Mr. Steve Chin is the present Registered Agent listed on corporate documents. Ms. Johnson-James stated Respondent did not receive any compensation from the Redemptive Life or the Rays during his time listed as the Registered Agent.

Ms. Johnson-James then noted Respondent was not the listed "Registered Agent" of Redemptive Life Fellowship Urban Initiative Corporation, which is the entity that was used to secure the housing contract with the City of West Palm Beach. She advised she never remembered Respondent ever holding the position as the Registered Agency for that particular entity.

Ms. Johnson-James advised she would provide an affidavit from Bishop Harold C. Ray, which would outline the time frame that Respondent performed paid work for the church. **The phone interview concluded at that time.**

I reviewed copies of Florida Non-Profit Corporation documents filed with the Florida Department of State by Redemptive Life Fellowship, Inc. These documents were submitted with the complaint and they list Respondent as the Registered Agent of Redemptive Life Fellowship, Inc. for the following dates:

- Listed Registered Agent: Keith James Filed: April 5, 1995
- Listed Registered Agent: Keith James Filed: May 1, 1996
- Listed Registered Agent: Keith James Filed: May 19, 1997
- Listed Registered Agent: Keith James Filed: October 14, 1998
- Listed Registered Agent: Keith James Filed: May 6, 1999
- Listed Registered Agent: Keith James Filed: May 10, 2000
- Listed Registered Agent: Keith James Filed: May 11, 2001
- Listed Registered Agent: Keith James Filed: May 24, 2002
- Listed Registered Agent: Keith James Filed: May 1, 2003
- Listed Registered Agent: Keith James Filed: April 28, 2004
- Listed Registered Agent: Keith James Filed: April 26, 2005
- Listed Registered Agent: Keith James Filed: May 1, 2006
- Listed Registered Agent: Keith James Filed: April 30, 2007
- Listed Registered Agent: Keith James Filed: April 30, 2008
- Listed Registered Agent: Keith James Filed: April 30, 2009
- Listed Registered Agent: Keith James Filed: May 2, 2010
- Listed Registered Agent: Keith James Filed: May 1, 2011
- Listed Registered Agent: Keith James Filed: April 30, 2012
- Listed Registered Agent: Keith James Filed: April 30, 2013
- Listed Registered Agent: Keith James Filed: May 1, 2014

On September 12, 2014 there was a copy of a Florida Non-Profit Corporation document filed to the Florida Department of State by Redemptive Life Fellowship, Inc., which shows Mr. Steve Chin as the new Registered Agent.

- Listed Registered Agent: Steve Chin Filed: September 12, 2014

In addition, there was a copy of a 2014 Florida Non-Profit Foundation document filed with the Florida Department of State by an entity named Kingdom Dominion Network, Inc. This document also shows Respondent as the listed Registered Agent and lists Harold C. Ray and Brenda Ray as officers.

- Listed Registered Agent: Keith James Filed: May 1, 2014

On June 3, 2002, Articles of Incorporation were filed with the Florida Department of State by Harold C. Ray under the corporation Redemptive Life Fellowship Urban Initiative Corporation. The listed officers are:

- Harold C. Ray
- Brenda J. Ray
- Donald Minor
- Alonzo Rozier
- Dale M. Smith
- James Gilbert
- Trinetta Hobbs
- Robert Schraeder

Mr. Donald Minor is listed as the "Registered Agent" on the Articles of Incorporation documents for Redemptive Life Fellowship Urban Initiative Corporation (RLUIC). In addition, Minor is listed as the "Registered Agent" on all corporate renewal documents filed by the Corporation from the years 2003 to present. Respondent's name was not found on any of the corporate documents for this entity.

On Monday, September 22, 2014, I reviewed the City of West Palm Beach September 2, 2014, 5:00 pm regular Commission Meeting via the link provided by the City website.

Respondent was present at the meeting. Commissioners pulled item number 9 from the "Consent Calendar". Item Number 9 is listed as:

***Resolution No. 219-14** authorizing technical revisions to the State of Florida Housing Initiatives Partnership Program (SHIP) Local Housing Assistance Plan (LHAP) for the program years 2009/10, 2010/11 and 2011/12 to amend the terms and provisions for various strategies.*

The resolution was a proposed settlement agreement drafted by City staff with the intent of resolving and repaying monies owed to HUD. This resolution was clearly based on the proposed settlement with HUD. The proposed repayment amount was \$1.4 million dollars in lieu of a fine by HUD. At no time during this discussion did I hear Commissioners or City staff raise any questions or comment(s) regarding Redemptive Life Fellowship, Inc., Kingdom Dominion Network, Inc. or Redemptive Life Fellowship Urban Initiative Corporation. Motion to approve the resolution by Commissioner Kimberly Mitchell, seconded by Commissioner Shannon Materio, and carried 5-0.

Motion by Commissioner Kimberly Mitchell to give approval for the City to write a check to cover the entire amount of the monies owed to HUD from the City's general Fund. There was discussion back and forth between the Commissioners debating on not wanting to penalize segments of the City's population by forgoing future funds from HUD as was discussed in Item 9 previously. At no time during this discussion did I hear City staff or Commissioners mention Redemptive Life or any of its subsidiaries. Motion seconded by Commissioner Shannon Materio, and carried 4-1. Commissioner Keith James opposed.

On Wednesday, September 24, 2014, at 9:15 AM, I took a sworn taped statement from West Palm Beach City Commissioner Keith James (Respondent) inside the COE Conference Room. Below are the details of that interview.

Respondent gave his name, work address and work phone number. He stated his occupation as an attorney. He also advised he is a City Commissioner for the City of West Palm Beach. Respondent advised he knows Bishop Harold Ray and Mrs. Debra Ray. He said he is a member of their church, Redemptive Life Fellowship and has been since 1993 or 1994.

He advised historically he has done *pro bono* work for the church based on different matters that may have come up. He said this work was primarily done under the Redemptive Life Fellowship Inc. entity. He also stated there was other work he performed for other entities associated with Bishop Ray such as Redemptive Life Fellowship Urban Initiative Corporation on both a *pro bono* basis and in some instances such as title work, for a modest fee.

Respondent stated Redemptive Life Fellowship Urban Initiative Corporation is a separate entity from Redemptive Life Fellowship, Inc. He said he was the "Registered Agent" for Redemptive Life Fellowship, Inc. from 1995 to very recently, September 2014. He advised he has been replaced as the "Registered Agent" by another individual in October 2014. He said he believes Mr. Steve Chin is now the "Registered Agent" of Redemptive Life Fellowship, Inc. but wasn't completely sure.

When I asked Respondent about Redemptive Life Fellowship Urban Initiative Corporation, he again said he knew of the entity, but that he is not and has never been the "Registered Agent" for them. He said he is not sure who is currently listed as the Registered Agent for RLFUIC. When asked about Donald Minor, Respondent said he knew Mr. Minor but wasn't sure if he is the listed "Registered Agent" for RLFUIC. He said RLFUIC is the entity that had contracts with the City to build housing through use of the HUD grants.

Then I asked if he was familiar with Kingdom Dominion Network, Inc., and he stated that this company was an affiliated entity of the church. He said he "may have been" the listed "Registered Agent" but wasn't absolutely sure.

Respondent was asked about the services he provided for RLFUIC. He said those services were performed for the entity in roughly 2006 or 2007. He said he did some legal title work for the organization and advised that was the only time he received monies from that particular entity. He said the services were performed prior to his election to the City Commission in 2011. Respondent stated he has not done any type of legal work for RLFUIC since 2011.

Respondent confirmed he attended the September 2, 2014 City of West Palm Beach Commission Meeting. When I showed him a copy of the meeting agenda, specifically "Item 9", he stated that item dealt with making revisions to the City's Local Housing Assistance Plan, which is a document the City has to file with HUD. He said the revisions were related to amendments to certain City programs to show what was done to alleviate HUD concerns. He said during the presentation, there was no specific outside entity named related to past issues. When I specifically asked about RLFUIC, he said that entity was never mentioned during the presentation.

He said there was a vote taken on the particular item, which passed unanimously to go forward with the revision of the amendments proposed by City staff. He advised he did take part in the vote and that the resolution never listed RLFUIC or any other specific entity. He stated, that to his knowledge, this Item was not directly related to RLFUIC.

Respondent added, as part of the discussion on "Item 9" at the Commission meeting, one of the Commissioners brought up the fact that HUD requested a \$1.5 million dollar back from the City and that the City had written a letter to HUD proposing a way for the City to repay the funds by foregoing certain future installments of home monies over a three to four year period. The same Commissioner felt it was inappropriate for the City to make that deal with HUD and preferred to write the check for \$1.5 million out of general funds to cover the monies owed instead of an installment payment plan. He stated that this was a separate question that was raised after the resolution vote and thus a separate motion was presented to either go along with staff's recommendation for the settlement or just write a check to cover the entire amount. He said he opposed the motion and did vote. He said he was out voted 4 to 1.

He reiterated this entire discussion just surrounded the settlement between the City and HUD and how to repay the \$1.5 million dollars. There was no discussion or reference to Redemptive Life or any other entity that may have had housing contracts with the City.

He stated that after the meeting and after seeing a newspaper article related to the subject, he inquired about a potential conflict by contacting City of West Palm Beach Ethics Officer Norm Ostrau the next day and asked that he to look into the matter. Verbally, Mr. Ostrau stated that it was his opinion that there was no conflict violation. Respondent then said Mr. Ostrau provided a written response, which he would provide.

The interview was concluded at 9:30 AM.

On Wednesday, September 24, 2014, a copy of a Notarized Affidavit was forwarded to me via email from Bishop Harold C. Ray. The Affidavit was signed and dated on September 21, 2014.

Bishop Ray lists himself as an attorney (member of the Texas Bar) and the Chief Executive Officer of Redemptive Life Fellowship, Inc. and Redemptive Life Fellowship Urban Initiatives Corporation. He states, Respondent has been a member of the church since 1991. He also states respondent has provided more than one hundred hours of legal services to both RLF and RLFUIC between the dates 1992/1993 until 2008/2009. Most of these services were performed on a *pro bono* basis. He advised on a few occasions, two or three, RLF paid Respondent a "modest" legal fee for services. He further states since his election to Commissioner for the City of West Palm Beach, Respondent has "not" provided "any" legal services for RLF or RLFUIC. This document was added to the file.

- **Additional Documents added to the File**

1. City of West Palm Beach Commission Meeting Agenda – September 2, 2014
2. City of West Palm Beach Commission Meeting Agenda *PASS/FAIL* – September 2, 2014
3. Notarized Affidavit from Bishop Harold C. Ray
4. "Voting Conflict" Letter from West Palm Beach Ethics Officer Norm Ostrau
5. Palm Beach Post Newspaper Article: *"Opponent files ethics complaint against West Palm Beach's James"* (September 18, 2014)
6. Redemptive Life Fellowship Urban Initiative Corporation – Articles of Incorporation
7. Redemptive Life Fellowship Urban Initiative Corporation – Corporate renewal documents for the years 1995-2014.
8. HOME OIG Report dated September 30, 2013
9. HUD Region IV, Miami Field Office, Letter dated May 19, 2014
10. City of West Palm Beach Request for Voluntary Grant Reduction Letter dated August 29, 2014

- **Summary of Investigation:**

In order to find a violation of §2-443(a) *Misuse of public office or employment*, it would have to be established that the Respondent used his official position to provide a "special financial benefit" for a customer or client of his outside business.

In order to find a violation of §2-443(b), *Corrupt misuse of official position*, it would have to be established that the Respondent used his official position or office to corruptly secure or attempt to secure a special privilege or benefit, for himself or others.

In order to find a violation of §2-443(c), *Disclosure of Voting Conflict*, it would have to be established that Respondent participated in and voted on a matter that resulted in a special financial benefit for a person or entity as listed in §2-443 (a)(1) through (7).

Respondent, Keith James has an established relationship with Redemptive Life Fellowship having been a member of the church since 1993 or 1994. He was also listed in the corporate documents as the "Registered Agent" of Redemptive Life Fellowship, Inc. However, according to documentation filed with the Department of State he is **not, nor has he ever been**, the "Registered Agent" of Redemptive Life Fellowship Urban Initiative Corporation, which is the entity that has the contractual agreement with City to build housing in urban areas.

There was no mention of Redemptive Life or any of its entities at the September 2, 2014 Commission Meeting. The discussion concerned the repayment method of monies owed to HUD. Redemptive Life and its entities would not be affected in any way by the repayment, as it was clearly established that the settlement is strictly between the City of West Palm Beach and HUD. Respondent's prior relationship to the church or any of the subsequent affiliates is not relevant in this case.

The relationship between Respondent and Redemptive Life Fellowship Urban Initiative Corporation does not meet the Code's definition of *Customer or Client*. The Code's definition states: "*an official or employee's outside employer or business has supplied goods or services during the previous twenty-four (24) months, having in the aggregate, a value greater than ten thousand dollars (\$10,000).*" In this instance, the paid work performed by Respondent occurred sometime between 2006 and 2007, which is well outside the required previous 24-month time period. In addition, the services provided resulted in a payment amount of \$2,500, which is also well below the \$10,000 threshold stated in the Code.

Although the Respondent voted on Item 9 as well as a separate but related matter of the Agenda during the September 2, 2014 City of West Palm Beach Commission Meeting, neither issue directly or indirectly involved Redemptive Life Fellowship, Inc., Dominion Network, Inc., or Redemptive Life Fellowship Urban Initiative Corporation. Therefore, there was no "Special Financial Benefit" provided.

It is important to note that the Complaint filed listed Redemptive Life Fellowship, Inc. as the entity which secured contracts with City. Thus, questioning Respondent's relationship as the "Registered Agent" of that entity. Through Florida Department of State records searches, a sworn taped statement from Respondent, and a phone interview with the entity's attorney, it has been established that Redemptive Life Fellowship Urban Initiative Corporation has the contract with the City, which has a different "Registered Agent" listed.

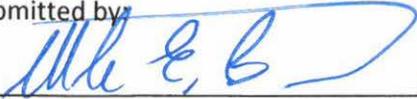
In addition, neither the vote regarding item 9 on the agenda from the September 2, 2014 Commission Meeting nor the subsequent yet related vote directly or indirectly involved Redemptive Life or its affiliated entities, thus there was no conflicted vote by Respondent.

Lastly, although Respondent did provide legal services to RLFUIC, the services were provided prior his election to the position of City Commissioner and the services performed did not equal to the amount of

\$10,000. Based on the time frame and amount, the threshold of a "customer or client" violation as defined in the Code has not been met.

The investigation is hereby concluded at this time.

Submitted by:

for  *Anthony C. Bennett*
Anthony C. Bennett
PB County Commission on Ethics

9/26/2014
Date

Reviewed by:

SA
(Initials)

9/26/2014
Date

PALM BEACH COUNTY COMMISSION ON ETHICS
PROBABLE CAUSE RECOMMENDATION

To: Commission on Ethics
From: Christie E. Kelley, Staff Counsel
Re: Case Number C14-009, Keith James, Commissioner, City of West Palm Beach

- **Recommendation**

A finding of NO PROBABLE CAUSE and DISMISSAL should be entered in the above captioned matter as to the allegations made in the Complaint.

Probable Cause exists where there are reasonably trustworthy facts and circumstances for the Commission on Ethics (COE) to believe that the Respondent, Keith James, violated the Palm Beach County Code of Ethics.

- **Jurisdiction**

The COE has jurisdiction pursuant to Chapter 2, Article V, Division 8, §2-258(a) of the Palm Beach County Commission on Ethics Ordinance which states in pertinent part:

Article V, Division 8, Section 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;

- (1) County Code of Ethics;
- (2) County Post-Employment Ordinance, and
- (3) County Lobbyist Registration Ordinance.

Article XIII, §2-443(a) *Misuse of public office or employment*, of the Palm Beach County Code of Ethics (the Code) prohibits any employee or official from using their official position to give a special financial benefit, not shared with similarly situated members of the general public, to their outside employer.

Article XIII, §2-443(b) *Corrupt misuse of official position*, of the Code prohibits any employee or official from using their official position to corruptly secure a benefit for others. For the purposes of this subsection, "corruptly" means done with a wrongful intent and for the purpose of obtaining any benefit resulting from some act or omission, which is inconsistent with the proper performance of his or her public duties.

Article XIII, §2-443(c) *Disclosure of Voting Conflicts* requires officials and advisory board members to abstain from voting and not participate in any matter that will result in a special financial benefit to the employee or official's outside employer.

This recommendation adopts by reference the Memorandum of Inquiry, Legal Sufficiency Determination and the Investigative Report.

- **Background**

This matter came to the attention of the Commission on Ethics (COE) staff via a sworn complaint filed by Alex Augustin, 401 North Rosemary, West Palm Beach, FL 33401 on September 15, 2014. The Complaint was properly notarized and hand delivered to the Commission on Ethics (COE) office via courier the same date. The Complaint listed Commissioner Keith James, 401 Clematis, West Palm Beach, FL 33401 as Respondent.

Attached to the sworn Complaint was a letter dated September 14, 2014. The letter was addressed to "Palm Beach County Commission on Ethics." The Complainant states Respondent is listed as the "Registered Agent" of

Redemptive Life Fellowship, Inc. located at 2101 Australian Avenue, West Palm Beach, Florida 33407. The letter was signed by the Complainant and stated: "This letter, along with supporting documentation, will serve as a formal ethics complaint on West Palm Beach City Commissioner Keith James."

The letter alleged that on September 2, 2014 at the City of West Palm Beach City Commission meeting, Respondent voted on a matter related to a proposed settlement between the City of West Palm Beach and the U.S. Department Housing and Urban Development (HUD). Complainant alleges the vote was related to work performed by Redemptive Life Fellowship and as the listed Registered Agent of Redemptive Life Fellowship, Inc., Respondent should have either disclosed the relationship and/or abstained from voting.

- **Facts**

The investigation revealed that Respondent is not, nor has he ever been, the "Registered Agent" of Redemptive Life Fellowship Urban Initiative Corporation, which is the entity that has the contractual agreement with City to build housing in urban areas.

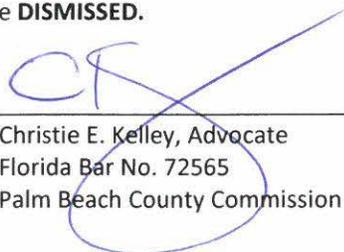
Item 9 of the September 2, 2014 Commission Meeting concerned the repayment method of monies in accordance with a settlement between HUD and the City. Redemptive Life and its entities would not be affected in any way by the repayment. Respondent's prior relationship to the church or any of the subsequent affiliates is not relevant in this case.

The relationship between Respondent and Redemptive Life Fellowship Urban Initiative Corporation does not meet the Code's definition of *Customer or Client*. The Code's definition states: "an official or employee's outside employer or business has supplied goods or services during the previous twenty-four (24) months, having in the aggregate, a value greater than ten thousand dollars (\$10,000)." In this instance, the paid work performed by Respondent occurred sometime between 2006 and 2007, which is well outside the required previous 24-month time period. In addition, the services provided resulted in a payment amount of \$2,500, which is also well below the \$10,000 threshold stated in the Code.

Although the Respondent voted on Item 9 as well as a separate but related matter of the Agenda during the September 2, 2014 City of West Palm Beach Commission Meeting, neither issue directly or indirectly involved a customer or client of his outside employer or business. As such, there was no voting conflict to disclose.

- **Conclusion**

Based on the facts and circumstances, there is **NO PROBABLE CAUSE** to believe that Respondent, Keith James, has violated §2-443(a), §2-443(b) or §2-443(c) of the Palm Beach County Code of Ethics. Therefore, staff recommends that this matter be **DISMISSED**.

BY: 
Christie E. Kelley, Advocate
Florida Bar No. 72565
Palm Beach County Commission on Ethics

9-26-14
Date

October 2, 2014

Mr. Cary P. Sabol
P.O. Box 15981
West Palm Beach, FL 33416

Re: RQO 14-026
Conflict of Interest

Dear Mr. Sabol,

The Palm Beach County Commission on Ethics (COE) considered your request for an advisory opinion, and rendered its opinion at a public meeting held on October 2, 2014.

QUESTION:

As the Chair of the Lake Worth Community Redevelopment Agency (LWCRA), are you prohibited from representing Adopt-a-Family in a real estate transaction in your personal capacity as an attorney? If you are prohibited from engaging in paid representation of Adopt-a-Family, are you permitted to represent and provide legal services to Adopt-a-Family on a pro bono basis (unpaid)?

ANSWER:

Based on the facts submitted, you are not prohibited from representing Adopt-a-Family in this real estate transaction in your personal capacity as an attorney.

As an appointed official, you are prohibited from using your official position on the LWCRA to give a special financial benefit, not shared with similarly situated members of the general public, to a customer or client of your outside business or to corruptly secure a special benefit for any person.¹ If you are presented with such a conflict, you must publicly disclose the nature of the conflict, file the required state disclosure form, and refrain from participating in and voting on the matter.² For Adopt-a-Family to be considered your customer or client, you must have supplied goods or services to the organization in excess of \$10,000 over the previous 24 months.³

Based on the facts presented here, Adopt-a-Family would not be considered your customer or client because the anticipated income from your representation would be less than \$2,000, which is below the \$10,000 monetary threshold required by the Code. Second, if you provide unpaid representation on a pro bono basis to Adopt-a-Family, then Adopt-a-Family would not be considered your customer or client under the Code. Therefore, under both of these instances, if Adopt-a-Family comes before the LWCRA on a matter, you are not required to abstain from participating in or voting on the matter.

FACTS:

You are the current Chairman for the LWCRA. The LWCRA is an independent special district and has a Memorandum of Understanding with the COE, bringing the LWCRA within the jurisdiction of the COE. You have been a board member of the LWCRA for approximately five years and the Chairman for over three years. Your position on the LWCRA Board is a volunteer position, and you work as an attorney in your personal capacity.

¹ §2-443(a); §2-443(b)

² §2-443(c)

³ §2-442

The LWCRA has recently been involved with the NSP-2 Grant, which was a grant awarded to the LWCRA by the U.S. Department of Housing and Urban Development. As part of this grant, the LWCRA formed various partnerships with other nonprofit organizations in the area to provide affordable housing in Lake Worth. One of the partners of the LWCRA is Adopt-a-Family, a local 501(c)(3) nonprofit organization. It is your understanding that Adopt-a-Family has received funds from the NSP-2 Grant. In addition, it is possible that Adopt-a-Family may have received other funds from the LWCRA in the past.

Adopt-a-Family recently contacted you and asked to hire you to represent that organization in a real estate transaction. You anticipate that your income from this representation would be less than \$2,000. Additionally, neither you nor your spouse serves as an officer or director of Adopt-a-Family.

LEGAL BASIS:

The legal basis for this opinion is found in §2-442 and §2-443 of the Code:

Sec. 2-442. Definitions.

Customer or client means any person or entity to which an official or employee's outside employer or business has supplied goods or services during the previous twenty-four (24) months, having, in the aggregate, a value greater than ten thousand dollars (\$10,000).

Sec. 2-443 Prohibited conduct.

- (a) **Misuse of public office or employment.** An official or employee shall not use his or her official position or office, or take or fail to take any action, or influence others to take or fail to take any action, in a manner which he or she knows or should know with the exercise of reasonable care will result in a special financial benefit, not shared with similarly situated members of the general public, for any of the following persons or entities:
 - (1) Himself or herself;
 - (5) A customer or client of the official or employee's outside employer or business;

- (b) **Corrupt misuse of official position.** An official or employee shall not use his or her official position or office, or any property or resource which may be within his or her trust, to corruptly secure or attempt to secure a special privilege, benefit, or exemption for himself, herself, or others. For the purposes of this subsection, "corruptly" means done with a wrongful intent and for the purpose of obtaining, or compensating or receiving compensation for, any benefit resulting from some act or omission of an official or employee which is inconsistent with the proper performance of his or her public duties.

- (c) **Disclosure of voting conflicts.** County and municipal officials as applicable shall abstain from voting and not participate in any matter that will result in a special financial benefit as set forth in subsections (a) above. The official shall publicly disclose the nature of the conflict and when abstaining from the vote, shall complete and file a State of Florida Commission on Ethics Conflict Form 8B pursuant to the requirements of Florida Statutes, §112.3143. Simultaneously with filing Form 8B, the official shall submit a copy of the completed form to the county commission on ethics. Officials who abstain and disclose a voting conflict as set forth herein, shall not be in violation of subsection (a), provided the official does not otherwise use his or her office to take or fail to take any action, or influence others to take or fail to take any action, in any other manner which he or she knows or should know with the exercise of reasonable care will result in a special financial benefit,

not shared with similarly situated members of the general public, as set forth in subsections (a)(1) through (7).

This opinion construes the Palm Beach County Code of Ethics Ordinance and is based upon the facts and circumstances that you have submitted. It is not applicable to any conflict under state law. Inquiries regarding possible conflicts under state law should be directed to the State of Florida Commission on Ethics.

Please feel free to contact me at 561-355-1915 if I can be of any further assistance in this matter.

Sincerely,

Steven P. Cullen,
Executive Director

Enclosure
CEK/gal

PROPOSED

October 3, 2014

Rebecca Driskill Caldwell, Executive Director
Palm Beach County Planning, Zoning, and Building
2300 North Jog Road
West Palm Beach, FL 33411

Re: RQO 14-027
Gifts

Dear Ms. Caldwell,

The Palm Beach County Commission on Ethics (COE) considered your request for an advisory opinion, and rendered its opinion at a public meeting held on October 2, 2014.

QUESTION:

As an employee of Palm Beach County, whether your attendance at an awards ceremony dinner, valued in excess of \$100 sponsored by a registered lobbyist in consideration of your participation as a judge in the "Build Florida Award" program, is considered a gift under the Palm Beach County Code of Ethics (Code)?

ANSWER:

Based upon the facts submitted, your attendance at the awards dinner is not a gift under the Code. As such, you are not prohibited by the Code from attending the event and there is no need to report it on a gift disclosure form.

Under the Code, you may not accept a gift in excess of \$100 from a lobbyist.¹ Gifts in excess of \$100, not otherwise prohibited or excluded, must be reported on an annual gift disclosure report.² An exception to the definition of a gift contained in Sec. 2-444(g) is a gift accepted in performance of official duties, by the county, for a public purpose.³ Furthermore, when the county employee performs work and preparation for the event as part of their official duties, that constitutes adequate consideration for any benefit received.⁴

FACTS:

You are the Executive Director of the Palm Beach County Planning, Zoning and Building Department. A trade organization, which is also a registered lobbyist, has asked you to act as a judge in their annual "Build Florida Award" program. The judging takes place during a workday. A significant amount of time, (4-8+) hours, would be spent in evaluating the applications before

¹ §2-444(a)(1).

² §2-444(f)(2)b.

³ §2-444(g)(1)e.

⁴ RQO 11-011

the judging event. A public purpose is served by your participation as this enhances the relationship between “industry” and the “enforcers.” By participating, the collaborative aspect of both industry and enforcer is given emphasis. Judges are expected to attend a dinner as part of the awards presentation ceremony. The value of the dinner exceeds \$100.

LEGAL BASIS:

The legal basis for this opinion is found in §2-444 of the Code of Ethics:

Sec. 2-444. Gift law.

- (a)(1) No county commissioner, member of a local governing body, mayor or chief executive when not a member of the governing body, or employee, or any other person or business entity on his or her behalf, shall knowingly solicit or accept directly or indirectly, any gift with a value of greater than one hundred dollars (\$100) in the aggregate for the calendar year from any person or business entity that the recipient knows, or should know with the exercise of reasonable care, is a vendor, lobbyist or any principal or employer of a lobbyist who lobbies, sells or leases to the county or municipality as applicable.
- (f) Gift reports. Any official or employee who receives a gift in excess of one hundred dollars (\$100) shall report that gift in accordance with this section.
- (2) *All other officials and employees who are not reporting individuals under state law.*
- b. *All other gifts.* All officials or employees who are not reporting individuals under state law and who receive any gift in excess of one hundred dollars (\$100), which is not otherwise excluded or prohibited pursuant to this subsection, shall complete and submit an annual gift disclosure report with the county commission on ethics no later than November 1 of each year beginning November 1, 2011, for the period ending September 30 of each year. All officials or employees who are not reporting individuals under state law and who do not receive a gift in excess of one hundred dollars (\$100) during a given reporting period shall not file an annual gift disclosure report. The annual gift disclosure report shall be created by the county commission on ethics and shall be in a form substantially similar in content as that required by state law.
- (g) For the purposes of this section, "gift" shall refer to the transfer of anything of economic value, whether in the form of money, service, loan, travel, entertainment, hospitality, item or promise, or in any other form, without adequate and lawful consideration.
- (1) Exceptions. The provisions of subsection (g) shall not apply to:
- e. Gifts solicited or accepted by county or municipal officials or employees as applicable on behalf of the county or municipality in performance of their official duties for use solely by the county or municipality for a public purpose.

This opinion construes the Palm Beach County Code of Ethics Ordinance and is based upon the facts and circumstances that you have submitted. It is not applicable to any conflict under state

law. Inquiries regarding possible conflicts under state law should be directed to the State of Florida Commission on Ethics.

Please feel free to contact me at 561-355-1915 if I can be of any further assistance in this matter.

Sincerely,

Steven P. Cullen
Executive Director

SPC/gal

PROPOSED

October 3, 2014

Michael Fitzpatrick, District 3 City Commissioner
City of Boynton Beach
100 E. Boynton Beach Blvd.
Boynton Beach, FL 33425

Re: RQO 14-028
Cone of Silence

Dear Commissioner Fitzpatrick,

The Palm Beach County Commission on Ethics (COE) considered your request for an advisory opinion, and rendered its opinion at a public meeting held on October 2, 2014.

QUESTION:

Does the cone of silence requirement of Palm Beach County Lobbyist Registration Ordinance §2-355 apply to a City Commissioner authorized by Resolution of the City Commission to enter into preliminary negotiations with the County to purchase at below market rate vacant County-owned land for a public purpose outside the confines of a pending formal bid process?

ANSWER:

Based upon the facts submitted, the cone of silence requirement of §2-355 of the Palm Beach County Lobbyist Registration Ordinance does not apply to you under these circumstances. You are clearly within the definition of "Persons or entities," under the Ordinance.¹ However, you are not seeking, on behalf of the City pursuant to the Resolution, an award from a competitive solicitation.² Because you are seeking, on behalf of the City for a public purpose, the sale of property at below market rate outside of the confines of the pending formal bid process, the cone of silence requirement, by the plain language of the Ordinance, is inapplicable to you under these circumstances.

FACTS:

You are a Boynton Beach City Commissioner. By Resolution Passed by the Commission on January 21, 2014, you have been given authority to enter into preliminary negotiations with representatives of Palm Beach County to effectuate the transfer of 4.85 acres of vacant landlocked County owned land for the purpose of preserving and expanding public parks. Palm Beach County has placed the land for sale through a bid process. County Commissioners will consider and vote upon the sale of the property at a future meeting. You, on behalf of the City pursuant to the Resolution, are seeking to buy the land from the County below market value as an inter-governmental transfer for use as a public park. The City proposal will be presented along side of the bid process. As such, the City is not participating in the bid process. Instead, the City is advocating that the County sell the property outside of the formal bid process for a public purpose. You believe that F.S. 125.38 provides authority for such sale.

LEGAL BASIS:

The legal basis for this opinion is found in §§ 2-352 and 2-355 of the Palm Beach County Lobbyist Registration Ordinance:

¹ § 2-352

² § 2-355(a)(1)

Sec. 2-352. Definitions.

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.

Sec. 2-355. Cone of silence.

- (a) **Cone of silence** means a prohibition on any communication, except for written correspondence, regarding a particular request for proposal, request for qualification, bid, or any other competitive solicitation between:
- (1) Any person or person's representative seeking an award from such competitive solicitation; and
 - (2) Any county commissioner or commissioner's staff, any member of a local governing body or the member's staff, a mayor or chief executive officer that is not a member of a local governing body or the mayor or chief executive officer's staff, or any employee authorized to act on behalf of the commission or local governing body to award a particular contract.
- (b) For the purposes of this section, a person's representative shall include but not be limited to the person's employee, partner, officer, director, consultant, lobbyist, or any actual or potential subcontractor or consultant of the person.
- (c) The cone of silence shall be in effect as of the deadline to submit the proposal, bid, or other response to a competitive solicitation. The cone of silence applies to any person or person's representative who responds to a particular request for proposal, request for qualification, bid, or any other competitive solicitation, and shall remain in effect until such response is either rejected by the county or municipality as applicable or withdrawn by the person or person's representative. Each request for proposal, request for qualification, bid or any other competitive solicitation shall provide notice of cone of silence requirements and refer to this article.
- (d) The provisions of this article shall not apply to oral communications at any public proceeding, including pre-bid conferences, oral presentations before selection committees, contract negotiations during any public meeting, presentations made to the board or local municipal governing body as applicable, and protest hearings. Further, the cone of silence shall not apply to contract negotiations between any employee and the intended awardee, any dispute resolution process following the filing of a protest between the person filing the protest and any employee, or any written correspondence at any time with any employee, county commissioner, member of a local municipal governing body, mayor or chief executive officer that is not a member of the local municipal governing body, or advisory board member or selection committee member, unless specifically prohibited by the applicable competitive solicitation process.
- (e) The cone of silence shall not apply to any purchases made in an amount less than the competitive bid threshold set forth in the county purchasing ordinance (County Code, chapter 2, article III, division 2, part A, section 2-51 et seq.) or municipal ordinance as applicable.
- (f) The cone of silence shall terminate at the time the board, local municipal governing body, or a county or municipal department authorized to act on behalf of the board or local municipal governing body as applicable, awards or approves a contract, rejects all bids or responses, or otherwise takes action which ends the solicitation process.

(g) Any contract entered into in violation of the cone of silence provisions in this section shall render the transaction voidable.

This opinion construes the Palm Beach County Code of Ethics Ordinance and is based upon the facts and circumstances that you have submitted. It is not applicable to any conflict under state law. Inquiries regarding possible conflicts under state law should be directed to the State of Florida Commission on Ethics.

Please feel free to contact me at 561-355-1915 if I can be of any further assistance in this matter.

Sincerely,

Steven P. Cullen,
Executive Director

SPC/gal

PROPOSED



Agenda

October 24, 2014 – 10:00 am
Vista Center,
2300 N. Jog Road, Rm 1W-47/50
Hearing Room/Chambers

WORKSHOP

Palm Beach County

Commission on Ethics

300 North Dixie Highway
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Commissioners

Salesia V. Smith-Gordon, Chair

Michael S. Kridel, Vice Chair

Michael F. Loffredo

Carmine A. Priore

Clevis Headley

Executive Director

Steven P. Cullen

Intake Manager

Gina A. Levesque

Staff Counsel

Christie E. Kelley

Senior Investigator

Mark E. Bannon

Investigator

Anthony C. Bennett

- I. Call to Order
- II. Roll Call
- III. Introductory Remarks
- IV. Introduction of Facilitator & Special Guests
- V. Historical Overview of COE
- VI. Roles of Commissioners
 - a. Relating to COE
 - b. Relating to Appointing Entities
- VII. Discussion Points:
 - a. OPPAGA Report and Changes implemented
 - b. Senator Abruzzo's "Ethic's Summit"
 - c. Establishment of COE Standards Book
- VIII. Review of Proposed Changes to COE Rules and By-Laws
- IX. Review of Proposed Changes to COE Ordinances
- X. Executive Director Comments
- XI. Commission Comments
- XII. Public Comments
- XIII. Adjournment

If a person decides to appeal any decision made by this Commission with respect to any matter considered at this meeting or hearing, (s)he will need a record of the proceedings, and that, for such purpose, (s)he may need to ensure that a verbatim record of the proceedings is made, which record includes the testimony and evidence upon which the appeal is to be based.