

Robert Daniels
1102 Cielo Court
North Venice, Fl. 34275-2222

Attorney Kelly Fernandez
City of Venice
June 21, 2021



Dear Attorney Fernandez:

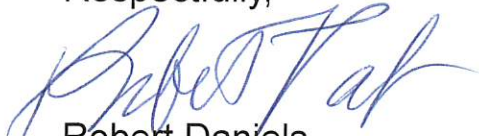
During Spring of 2019 I was an elected official on Venice City Council and always performed my duties in the best interest of the City of Venice. While doing so an erroneous ethics complaint was filed against me with the State of Florida Commission on Ethics. I was acting within the scope of my duties as an agent of the City. I did not violate any ethical practices nor did anything illegal. This was affirmed by the State of Florida Commission on Ethics on April 21, 2021 as they dismissed the complaint. (Attachment A)

During a discussion with you it was stated that the City of Venice had no defined process or procedures for handling ethics complaints. You had suggested several names. I then hired an Attorney that dealt with Ethics claims. Tim M. Cerio was retained to represent me. The Pandemic and the fact that the Court Magistrate was changed during the legal process resulted in the case taking a longer period of time. As stated on April 21, 2021 the court ruled in my favor and dismissed the case. (Attachment A)

Since I was acting within the scope of my official duties and I did nothing wrong I am asking for reimbursement from the City of Venice for my legal fees of \$9,202. My total legal bill from invoices was \$10,602 (Attachment B) to represent my case. I had applied \$1400 left over from my campaign

towards my bill. So the balance is \$9,202 that I am requesting from the City.
Your prompt attention to this matter is appreciated.

Respectfully,



Robert Daniels

Attachment A: Public Report-Ethics Commission

Attachment B: Invoices

Cc: Alan Bullock

Attachment (H)

BEFORE THE
STATE OF FLORIDA
COMMISSION ON ETHICS

DATE FILED

APR 21 2021

COMMISSION ON ETHICS

In re ROBERT DANIELS,

Respondent.

Complaint No. 19-134

PUBLIC REPORT

Based on the preliminary investigation of this complaint and on the recommendation of the Commission's Advocate, the Commission on Ethics finds that there is no probable cause to believe Respondent, as a member of the Venice City Council, violated Section 112.313(6), Florida Statutes, by using or attempting to use his official position and/or resources within his trust to conduct a background check on a person and share the results of the background check with a private citizen via his publicly issued email account and/or public server, as alleged in the complaint.

Accordingly, this complaint is dismissed with the issuance of this public report.

ORDERED by the State of Florida Commission on Ethics meeting in executive session on Friday, April 16, 2021.

April 21, 2021
Date

JoAnne Leznoff
Chair, Florida Commission on Ethics

JL/cmk

cc: Mr. Timothy M. Cerio and Mr. D. Ty Jackson, Attorneys for Respondent
Ms. Elizabeth A. Miller, Commission Advocate
Ms. Dawn Champiny, Complainant

Ethics Invoices

September 12,2019.	#10889668.	\$540.00
November 13,2019.	#10903150.	\$2682.50
November 20,2020.	#10976869.	\$1350.00
July 8,2020.	#10950509.	\$852.50
March 29,2021.	#10998900.	\$2432.50
May 25,2021.	#11010700.	\$2744.50

Total \$10,602.00. Minus \$1400 from campaign account

Requested reimbursement \$9202.00

GRAYROBINSON P.A.

Attorneys At Law
Post Office Box 3068
Orlando, Florida 32802

Telephone (407) 843-8880
Federal ID # 59-1300132

Robert Daniels
1102 Cielo Court
North Venice, FL 34275

September 12, 2019
FILE # 265220 - 1

Invoice # 10889668
Re: Ethics Commission

This summary includes all transactions on the above matter processed up to and including the date of the last transaction shown on this invoice. Any transactions, including credits or receipts processed after that date will be reflected on a future statement.

CURRENT FEES:	\$ 540.00
CURRENT DISBURSEMENTS:	\$ 0.00
CURRENT BALANCE DUE:	\$ 540.00

Daniels, Robert
Ethics Commission

Invoice No. 10889668
Invoice Date: September 12, 2019

Professional Services:

08/06/19	TMC	Prepare and file notice of appearance; receipt and review of documents forwarded by client; telephone conference with client regarding same.	1.20	\$ 540.00
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Current Fees:	<u>\$ 540.00</u>
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Summary of Professional Fees:

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
Cerio, Timothy	1.20	\$ 450.00	\$ 540.00
	<u>1.20</u>		<u>\$ 540.00</u>

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Attorneys At Law
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North Venice, FL 34275

November 13, 2019
FILE # 265220 - 1

Invoice # 10903150
Re: Ethics Commission

This summary includes all transactions on the above matter processed up to and including the date of the last transaction shown on this invoice. Any transactions, including credits or receipts processed after that date will be reflected on a future statement.

CURRENT FEES:	\$ 2,682.50
CURRENT DISBURSEMENTS:	\$ 0.00
CURRENT BALANCE DUE:	\$ 2,682.50

1072

CLIENT COPY

PAYMENT IS DUE UPON RECEIPT

To ensure timely allocation to amounts due, please wire payment to:

Wells Fargo Bank, NA
ABA/Routing #121000248
GrayRobinson, P.A. Operating Account
Account #2699400205474

Please reference your File or Invoice Number.

Daniels, Robert
Ethics Commission

Invoice No. 10903150
Invoice Date: November 13, 2019

Professional Services:

09/24/19	TJ	Review complaint; review documents from client re complaint; research re Venice records; research re radaris.	1.60	\$680.00
09/25/19	TJ	Research re defense of allegations.	0.50	\$212.50
10/07/19	TJ	Review of documents; prepare response to commission; conference with client re same.	2.80	\$1,190.00
10/14/19	TJ	Review of documents from client re COE issue; revise letter to COE; correspondence to client re same.	1.20	\$510.00
10/21/19	TMC	Review draft of preliminary response to ethics commission; conference with T. Jackson regarding same.	0.20	\$90.00

Current Fees:

\$2,682.50

Summary of Professional Fees:

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
Jackson, Ty	6.10	\$ 425.00	\$ 2,592.50
Cerio, Timothy	0.20	\$ 450.00	\$ 90.00
	<u>6.30</u>		<u>\$ 2,682.50</u>

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Telephone (407) 843-8880
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Robert Daniels
1102 Cielo Court
North Venice, FL 34275

July 8, 2020
FILE # 265220 - 1

Invoice # 10950509
Re: Ethics Commission

This summary includes all transactions on the above matter processed up to and including the date of the last transaction shown on this invoice. Any transactions, including credits or receipts processed after that date will be reflected on a future statement.

CURRENT FEES:	\$ 852.50
CURRENT DISBURSEMENTS:	\$ 0.00
CURRENT BALANCE DUE:	\$ 852.50

1072

CLIENT COPY

PAYMENT IS DUE UPON RECEIPT

To ensure timely allocation to amounts due, please wire payment to:

Wells Fargo Bank, NA
ABA/Routing #121000248
GrayRobinson, P.A. Operating Account
Account #2699400205474

Please reference your File or Invoice Number.

Professional Services:

11/01/19	TJ	Review of draft letter; review of documents in preparation for call with client; conference with client re strategy for response to complaint.	1.00	\$ 425.00
11/01/19	TMC	Review draft letter from client regarding allegations against him.	0.10	\$ 45.00
11/23/19	AB	Call with Tim Cerio regarding use of campaign funds in connection with ethics proceeding; conducted research; correspondence with Tim Cerio outlining results of research regarding use of campaign funds in connection with ethics proceeding.	0.90	\$ 382.50

Current Fees: \$ 852.50

Summary of Professional Fees:

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
Bardos, Andy	0.90	\$ 425.00	\$ 382.50
Jackson, Ty	1.00	\$ 425.00	\$ 425.00
Cerio, Timothy	0.10	\$ 450.00	\$ 45.00
	<u>2.00</u>		<u>\$ 852.50</u>

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Robert Daniels
1102 Cielo Court
North Venice, FL 34275

November 20, 2020
FILE # 265220 - 1

Invoice # 10976869
Re: Ethics Commission

This summary includes all transactions on the above matter processed up to and including the date of the last transaction shown on this invoice. Any transactions, including credits or receipts processed after that date will be reflected on a future statement.

CURRENT FEES:	\$ 1,350.00
CURRENT DISBURSEMENTS:	\$ 0.00
CURRENT BALANCE DUE:	\$ 1,350.00

1072

CLIENT COPY

PAYMENT IS DUE UPON RECEIPT

To ensure timely allocation to amounts due, please wire payment to:

Wells Fargo Bank, NA
ABA/Routing #121000248
GrayRobinson, P.A. Operating Account
Account #2699400205474

Please reference your File or Invoice Number.

Daniels, Robert
Ethics Commission

Invoice No. 10976869
Invoice Date: November 20, 2020

Professional Services:

09/17/20	TMC	Prepare for client's interview with Ethics Commission investigator.	1.00	\$450.00
09/18/20	TMC	Meet with client to prepare for interview with investigator; attend ethics investigator interview of client.	2.00	\$900.00

Current Fees:	<u>\$1,350.00</u>
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Summary of Professional Fees:

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
Cerio, Timothy	3.00	\$ 450.00	\$ 1,350.00
	<u>3.00</u>		<u>\$ 1,350.00</u>

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Robert Daniels
1102 Cielo Court
North Venice, FL 34275

March 29, 2021
FILE # 265220 - 1

Invoice # 10998900
Re: Ethics Commission

This summary includes all transactions on the above matter processed up to and including the date of the last transaction shown on this invoice. Any transactions, including credits or receipts processed after that date will be reflected on a future statement.

CURRENT FEES:	\$ 2,432.50
CURRENT DISBURSEMENTS:	\$ 0.00
CURRENT BALANCE DUE:	\$ 2,432.50

1072

CLIENT COPY

PAYMENT IS DUE UPON RECEIPT

To ensure timely allocation to amounts due, please wire payment to:

Wells Fargo Bank, NA
ABA/Routing #121000248
GrayRobinson, P.A. Operating Account
Account #2699400205474

Please reference your File or Invoice Number.

Daniels, Robert
Ethics Commission

Invoice No. 10998900
Invoice Date: March 29, 2021

Professional Services:

02/01/21	TJ	Review and analysis of report of investigation and supporting documents.	0.30	\$127.50
02/02/21	TJ	Review of ROI; review prior correspondence with client re facts; draft correspondence to client re ROI.	0.50	\$212.50
02/08/21	TJ	Preparation for and conference with client re response to Report of Investigation.	0.30	\$127.50
02/08/21	TMC	Review investigator's report; discuss same with client and T. Jackson.	0.40	\$180.00
02/09/21	TJ	Draft/revise response to ROI; review ROI and complaint in support of same.	2.60	\$1,105.00
02/10/21	TJ	Finalize response to report of investigation.	0.20	\$85.00
02/18/21	TJ	Review of Advocate's Recommendation; draft/revise response to Advocate's Recommendation.	1.40	\$595.00

Current Fees: \$2,432.50

Summary of Professional Fees:

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
Jackson, Ty	5.30	\$ 425.00	\$ 2,252.50
Cerio, Timothy	0.40	\$ 450.00	\$ 180.00
	<u>5.70</u>		<u>\$ 2,432.50</u>

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Attorneys At Law
Post Office Box 3068
Orlando, Florida 32802

Telephone (407) 843-8880
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Robert Daniels
1102 Cielo Court
North Venice, FL 34275

May 25, 2021
FILE # 265220 - 1

Invoice # 11010700
Re: Ethics Commission

This summary includes all transactions on the above matter processed up to and including the date of the last transaction shown on this invoice. Any transactions, including credits or receipts processed after that date will be reflected on a future statement.

CURRENT FEES:	\$ 2,744.50
CURRENT DISBURSEMENTS:	\$ 0.00
CURRENT BALANCE DUE:	\$ 2,744.50

1072

CLIENT COPY

PAYMENT IS DUE UPON RECEIPT

To ensure timely allocation to amounts due, please wire payment to:

Wells Fargo Bank, NA
ABA/Routing #121000248
GrayRobinson, P.A. Operating Account
Account #2699400205474

Please reference your File or Invoice Number.

Daniels, Robert
Ethics Commission

Invoice No. 11010700
Invoice Date: May 25, 2021

Professional Services:

03/04/21	JB	Finalize and File Response to the Advocate's Recommendation	0.10	\$9.50
03/04/21	TJ	Draft/revise response to Advocate's Recommendation; correspondence with client re same.	0.40	\$170.00
03/04/21	TMC	Receipt and review of response to Advocate's recommendation; telephone conference with client re same.	0.80	\$360.00
03/30/21	TJ	Review correspondence re probable cause; correspondence with COE re possible remote appearance; develop strategy for probable cause hearing.	0.30	\$127.50
04/15/21	TJ	Review of documents in preparation for Commission hearing.	1.10	\$467.50
04/16/21	TJ	Continued review of documents and research in preparation for Commission hearing; attend commission hearing; conference with client re outcome.	2.20	\$935.00
04/16/21	TMC	Prepare for and attend commission hearing.	1.50	\$675.00

Current Fees:

\$2,744.50

Summary of Professional Fees:

<u>NAME</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
Jackson, Ty	4.00	\$ 425.00	\$ 1,700.00
Cerio, Timothy	2.30	\$ 450.00	\$ 1,035.00
Bruce, Jennifer	0.10	\$ 95.00	\$ 9.50
	<u>6.40</u>		<u>\$ 2,744.50</u>