

STATE OF FLORIDA
COMMISSION ON ETHICS
P. O. DRAWER 15709, TALLAHASSEE, FLORIDA 32317-5709

COMPLAINT

1. PERSON BRINGING COMPLAINT:

Name: Charles P Swofford Telephone Number: 352-633-8015

Address: 3354 Richmond

City: The Villages County: Sumter Zip Code: 32162

2. PERSON AGAINST WHOM COMPLAINT IS BROUGHT:

Current or former public officer, public employee, candidate, or lobbyist - please use one complaint form for each person you wish to complain against:

Name: GOVERNOR RICK SCOTT AND THE STATE OF FLORIDA Telephone Number: 850-488-7146

Address: 400 S. MONROE ST

City: TALLAHASSEE County: JEFFERSON Zip Code: 32399

Title of office or position held or sought: GOVERNOR OF FLORIDA

3. STATEMENT OF FACTS: SEE ATTACHED SHEETS

Please explain your complaint fully, either on the reverse side of this form or on additional sheets, providing a detailed description of the facts and the actions of the person named above. Include relevant dates and the names and addresses of persons whom you believe may be witnesses. If you believe that a particular provision of Article II, Section 8, Florida Constitution (the Sunshine Amendment) or of Part III, Chapter 112, Florida Statutes (the Code of Ethics for Public Officers and Employees) has been violated, please state the specific section(s). Please do not attach copies of lengthy documents; if they are relevant, your description of them will suffice. Also, please do not submit video tapes or audio tapes.

4. OATH.

STATE OF FLORIDA
COUNTY OF Sumter

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 thereto are true and correct to the best of my knowledge and belief.

Sworn to (or affirmed) and subscribed before me
this 29 day of January,
20 15, by Charles Swofford
(name of person making statement)

Ch P Swofford
SIGNATURE OF COMPLAINANT

Vicki K Breslin
(Signature of Notary Public, State of Florida)
VICKI K. BRISLIN
Notary Public - State of Florida
My Comm. Expires Oct 20, 2017
(Print Name of Notary Public)
Commissioned Name of Notary Public
Bonded Through National Notary Assn.
Personally known OR Produced Identification
Type of Identification Produced:
FLDL

1/29/2015

To the Florida Commission on Ethics,

This a complaint as to whether it is Ethical for Governor Rick Scott of Florida and the State of Florida to fire Jerry Baily The head of Florida Department of Law Enforcement in Secret Meetings not open to the Public and without the Knowledge and Consent of Florida State Cabinet officials CFO Jeff Atwater, Attorney General Pam Bondi. and Commissioner of Agriculture Adam Putnam.

Charles Swofford

Attorney asks for inquiry on Scott, Cabinet over ouster of FDLE's Bailey

Compiled from wire reports

TALLAHASSEE — A St. Petersburg attorney is asking a Tallahassee prosecutor to investigate whether Gov. Rick Scott and three Cabinet officials violated the state's open-meetings law in the ouster of Gerald Bailey.

Matthew Weidner filed his complaint Wednesday. It came the same day Gov. Rick Scott vigorously denied doing anything wrong in the dismissal of the Florida Department of Law Enforcement commissioner.

Weidner asked State Attorney Willie Meggs to look into whether Scott and Cabinet officials reached a decision in secret to force out Bailey. Bailey has said he was told that the governor and Cabinet officials

agreed he should step down. FDLE reports to the governor and the Cabinet.

Agriculture Commissioner Adam Putnam and Chief Financial Officer Jeff Atwater said Wednesday that they knew Scott wanted to replace Bailey but said they were surprised he resigned.

Meanwhile, Attorney General Pam Bondi, another member of the Cabinet, contended that Scott didn't approve of Bailey's ouster.

Bondi instead suggested it was the governor's staff who pressed Bailey to resign from his job.

"Did I know that Jerry Bailey was going to be told he was fired and have his things packed up, his entire life as a career law-enforcement officer in a cardboard box, and be told to be out of

the office before the end of the day? Absolutely not. Nor do I believe the governor knew it," Bondi said to reporters.

Later, she added: "I do not think that Rick Scott would do that. I think it was done at the staff level. I firmly believe it was done at the staff level."

Bondi acknowledged she had no proof to back her opinion and had not discussed the matter with Scott.

Putnam described the treatment of Bailey as "shabby."

Scott's office has maintained that no laws were violated in the way that Bailey's ouster was handled.

The Associated Press and News Service of Florida contributed to this report.