

**IN THE CIRCUIT COURT FOR THE SECOND JUDICIAL CIRCUIT IN AND FOR
LEON COUNTY FLORIDA**

GEORGE SHELDON,
a citizen and registered voter in Florida
Petitioner/Plaintiff

vs.

CASE NO: 2014-CA_____

RICHARD L. "RICK" SCOTT,
Individually (and in his capacity as a candidate
for election to the Office of Governor of Florida)
Respondent/Defendant

**Petition For Declaratory Statement That Candidate Rick Scott Failed To Disclose
All His Financial Assets As Required By The Constitution And Injunctive Relief**

Plaintiff George Sheldon (Sheldon) sues the Defendant Richard L. "Rick" Scott (Scott) and alleges:

1. Article II, Section 8, of the Florida Constitution, the Sunshine Amendment, requires that a candidate for Governor "shall file full and public disclosure of their financial interests."

2. This lawsuit seeks to enforce that promise of transparency and accountability by requiring Rick Scott to fully disclose the financial interests he admittedly controls, a web of complex financial arrangements with assets totaling hundreds of millions of dollars.

3. Yet Rick Scott discloses much less. In 2009, Rick Scott told Floridians he was worth \$218.4 million. (Ex.1, See Page 2) A year later, he reported a net worth of \$103 million. (Ex. 2, See Page 2) Then, in 2011, he created an allegedly blind trust with

a net worth of \$82.9 million. (Ex.3, See Page 2) In 2012, despite at least \$25,000,000 in income this grew slightly to \$83.7 million. (Ex.4, See Page 2) This year Scott reported a 2013 net worth at \$132.7 million – almost 60 percent increase over the previous year. (Ex. 5, See Page 2)

4. Rick Scott has under-reported his financial interests; the assets that he owns and controls. He reports one set of facts to the State of Florida and another set of facts to the Securities and Exchange Commission. Both cannot be true. The full extent of his omissions and what financial interests he has that may conflict with his duties as Governor is unknown, thus necessitating this case.

Summary of Case

5. This is a civil action in which Plaintiff seeks declaratory and injunctive relief to compel Defendant Rick Scott to promptly file the full and public disclosure required by Article II, Section 8, of the Florida Constitution (Ex.6, See Page 9) and by Section 112.3144, Florida Statutes. (Ex.7, See Page 2) The specific relief sought by Plaintiff includes the following:

- a. A declaratory judgment that Rick Scott failed to fully and publicly disclose his financial interests, including hundreds of millions of dollars of assets, in violation of the Florida Constitution, Article II, Section 8 and Section 112.3144, Florida Statutes;
- b. An order directing Rick Scott to comply with the Constitution and statutes by immediately and accurately disclosing all assets he owns or controls; and,

- c. A declaratory judgment that the so-called "qualified blind trust" created by Rick Scott in June 2014, fails to comply with the requirements of Section 112.31425 Florida Statutes (Ex.7, See Page 6);

Background

6. The former Chairman and CEO of Columbia/HCA Healthcare Corporation, Rick Scott resigned his position after fraud investigators raided 18 Columbia/HCA hospitals in six states. He received a "Golden Parachute" of \$9.88 million and shares of stock valued at over \$300 million. (Ex. 8, See Page 3, 8, 9)

7. Rick Scott used the proceeds to form an investment company, Richard L. Scott Investments ("RLSI"). Since then Rick Scott has employed and managed a complex web of investment vehicles which appears to include at least six trusts, numerous partnerships, investment funds and accounts. Publically available documents reflect financial interests of at least \$340 million.

8. His Florida financial disclosure of June 16, 2014 reports a net worth of only \$132.7 million. His worth is understated.

Jurisdiction and Parties

9. This Court has jurisdiction pursuant to Sections 86.011 and 26.012, Florida Statutes and venue is appropriate pursuant to Section 47.011, Scott is a resident of Leon County.

10. Plaintiff is a permanent Florida resident, registered voter and taxpayer residing in Leon County. Plaintiff is eligible to vote, has voted in past elections, and intends to vote in the coming gubernatorial election. Plaintiff has constitutional and statutory rights to the timely full and public financial disclosure by Rick Scott, and all

other candidates for, or holders of, statewide elected office. Such rights are guaranteed to all citizens of Florida in the Florida Constitution.

11. Defendant Rick Scott is the current Governor of Florida. On August 26, 2014, Scott won the Republican Party nomination for Governor. On June 16, 2014, Scott filed financial disclosure documents with the Florida Secretary of State (Ex. 1, 2013 Financial Disclosure). Rick Scott has filed similar disclosures for each year since 2009. See Exs. 1-4 (Financial Disclosures for 2009-2012).

12. Rick Scott is sued in his individual capacity as a candidate for the 2014 gubernatorial election because his filing of financial disclosure documents on June 16, 2014, was a requirement for him to qualify as a candidate

13. Plaintiff has standing to bring this action as a citizen, taxpayer, and voter.

Sunshine Amendment Violations

14. In November of 1976, approximately 80 percent of Florida voters approved an amendment to the Florida Constitution by adding Article II, Section 8, which is popularly referred to as the “Sunshine Amendment.”

15. The Full and Public Disclosure of Financial Interest, Form 6, filed by Scott on June 16, 2014, violates the Sunshine Amendment and related statutes because it fails to disclose all assets owned by Rick Scott that have a value in excess of \$1,000.

16. The purposes and effects of the Sunshine Amendment include a guarantee to all voters in the State of Florida that they will receive timely information about the personal financial interests of all candidates and holders of elected statewide office sufficient for the voters to make their own informed decisions as to whether such interests raise any concerns about the possibility of conflicts of interest.

17. Article II, Section 8, of our Florida Constitution reads, in relevant part:

Ethics in government.—A public office is a public trust. The people shall have the right to secure and sustain that trust against abuse. To assure this right:

(a) All elected constitutional officers and candidates for such offices and, as may be determined by law, other public officers, candidates, and employees shall file full and public disclosure of their financial interests.

(f)(1) Full and public disclosure of financial interests shall mean filing with the custodian of state records by July 1 of each year a sworn statement showing **net worth and identifying each asset and liability in excess of \$1,000.** (Emphasis added.)

(Ex.6, See Page 9); See also § 112.3144 (Ex.7, See Page 2) (requiring full and public disclosure of financial interest).

18. Since the adoption of the Sunshine Amendment laws have been enacted by the Florida Legislature and rules and forms have been adopted by the Florida Commission on Ethics, which specify the time, place, and manner by which the constitutional guarantee of full and public financial disclosure will be implemented. See, e.g., § 112.3144. Candidates are required to file Form 6 entitled “Full and Public Disclosure of Financial Interest.”

19. Under the Florida Ethics Code, the Florida Commission on Ethics has investigatory powers as well as statutory authority to impose nominal fines and make recommendations for penalties to one of the statutorily designated disciplinary authorities. The penalties that can be recommended by the Florida Commission on Ethics and that can be imposed by one of the statutorily designated disciplinary authorities are strictly limited to those enumerated by statute.

20. There is no statutory authority for either the Florida Commission on Ethics or for any of the statutorily designated disciplinary authorities to require a public officer or a candidate to file complete and correct financial disclosure documents. See § 112.317, F.S. That is why this case is necessary and appropriate.

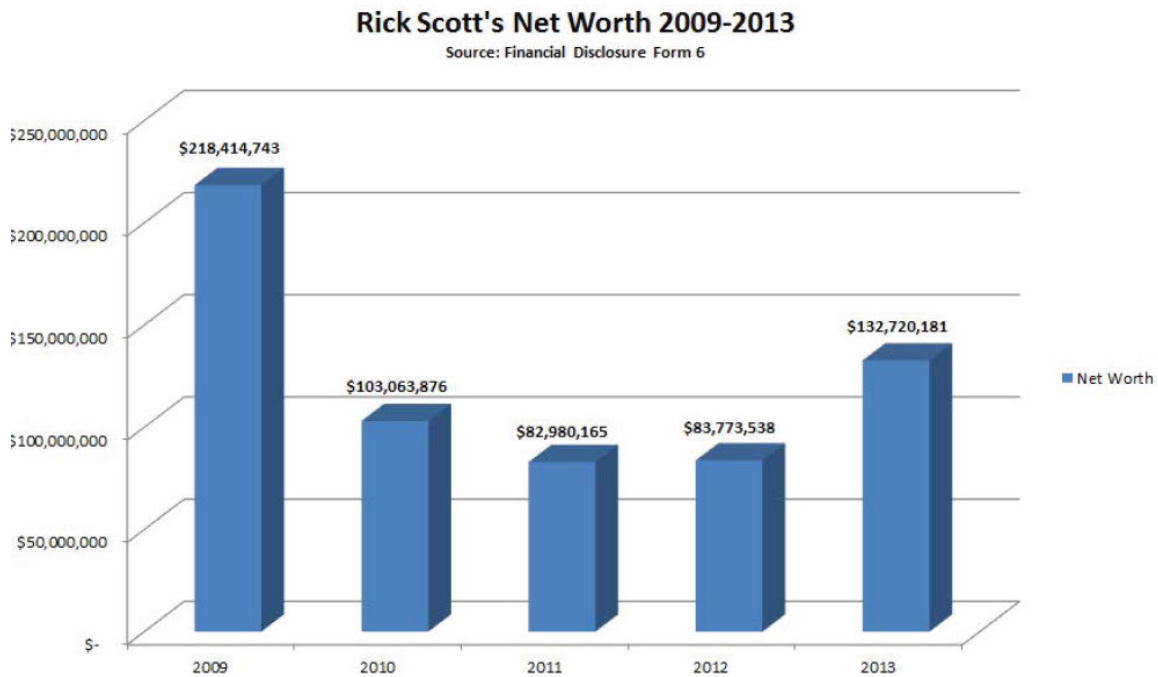
21. The only relief available to vindicate Plaintiff's constitutional right to full and public disclosure of Scott's financial interests is this Court through its power to compel compliance with the Constitution and statutes. Any action taken by any designated disciplinary authority to punish Scott for failing to file complete and correct financial disclosure documents would do nothing to provide the Plaintiff with the financial disclosure information to which Plaintiff is guaranteed by both constitutional and statutory mandates.

Financial Interests

22. Dating back to the inception of Richard L. Scott Investments (RLSI) and continuing to this day, the Defendant Scott has retained beneficial ownership of hundreds of millions of dollars of assets which he moves between a network of trusts, partnerships, accounts and financial vehicles. Because he does not include these entities on his financial disclosure, it is impossible to detect and evaluate the potential conflicts of interest that may exist or develop with respect to his financial interests.

23. It was publically announced that when he left Columbia/HCA Healthcare Corporation that Scott received stock worth \$300 million (Ex.8, See Page 3) and between 2007 and 2012 Scott and his wife have reported combined income of \$123,511,260. (Ex. 9) Significant profits from other successful investments have been disclosed, and yet he reports to Floridians a net worth of only a fraction of this amount.

24. He discloses only what he chooses to disclose. As the attached chart illustrates, (See Ex.10), his reported net worth bounces wildly without explanation. In 2011 his net worth was reported as \$82,980,165 and he reported income of \$25,920,639 – a total of \$108,900,804. Yet his net worth for 2012 was reported to be \$83,773,538. No explanation is offered as to what happened to the difference. Perhaps more confusing, his reported 2012 income was only \$3,183,984 yet his 2013 net worth exploded to \$132,720,181.



Scott Family Trusts, Partnerships

25. Over the years Scott has established many different entities to hold his wealth. Rick Scott has used at least the following trusts or partnerships: (i) Richard L. Scott Revocable Trust, (ii) Richard L. Scott Florida Trust, (iii) Richard L. & F. Annette Scott Family Partnership, (iv) Frances Annette Scott Revocable Trust, (v) Annette Scott Florida Trust, and (vi) Scott Family Florida Partnership Trust (“Scott Trusts”).

26. While there may be legitimate business and estate planning reasons for arranging his assets in these multiple entities, they remain his financial interests subject to disclosure, since Scott’s assets and earnings were contributed to each entity. Funds appear to be moved seamlessly between the entities and in concert; they are all financial interests of the Defendant Scott. Because he does not include these entities on his financial disclosure they enable Scott to conceal some of his assets and financial interests from public view.

27. However, when he is a controlling shareholder Rick Scott must report his beneficial ownership in publicly traded companies with the United State Securities and Exchange Commission. (Ex. 11)

28. Rick Scott’s financial disclosure forms, the joint tax returns of Rick and Ann Scott and public documents from the SEC and other sources reveal that these trusts and partnerships either hold assets or have generated income worth at least \$340 million since he was elected governor in 2010. (Ex. 12) (Ex. 13)

29. Public documents reveal more than 25 coordinated investments in publicly traded companies made by and on behalf of Rick Scott, RLSI, the other Scott Trusts and Partnerships, and the blind trust over the years (“Scott Related Entities.”) (See

Summary Chart, Ex. 14) Non-public transactions involving the Scott Related Entities cannot be brought into the sunshine without the relief sought in this case.

30. A “revocable trust” is one where the person contributing assets to the trust may “revoke” that contribution at any time and reclaim full ownership and use of those assets. The person contributing the assets is called the “settlor”. The settlor continues to be the owner of the assets contributed to the revocable trust for so long as the trust retains its revocable character, because at any time for any reason a settlor may revoke a revocable trust and take back some or all of the assets previously contributed to the trust. This is true even though assets contributed to a revocable trust are held in the name of the trust. Section 736.0505(1)(a), Florida Statutes, states: "(a) The property of a revocable trust is subject to the claims of the settlor’s creditors during the settlor’s lifetime to the extent the property would not otherwise be exempt by law if owned directly by the settlor."

31. Because Rick Scott continues to be the settlor with a financial interest in the assets he contributes to the revocable trusts, Rick Scott is required by statute and by the constitution to make full financial disclosure of all such contributed assets that have a value of \$1,000 or more.

Public Documents

32. Non-public transactions involving the Scott related entities are not open to public scrutiny and cannot be brought into the sunshine without the relief sought in this case. However, the SEC requires investors with substantial interests in a public company to promptly and accurately disclose changes in their holdings. (Ex. 11) These

filings are signed pursuant to federal statutes that impose fines and prison sentences for false statements or misrepresentations.

33. Numerous filings to the SEC identify “Richard L. Scott” as “The Reporting Person” and state that he has beneficial ownership and has held voting, investment power or control of the investments in public companies held by Scott related entities. .

34. Rick Scott has reported to the SEC that he was the beneficial owner of shares in Argan, Inc., Xfone Inc. / NTS, Inc., Wireless Telecom Group and Quepasa Corporation / MeetMe, Inc.. His ownership in these companies as reported to the SEC was worth about \$36 million more than he disclosed to Floridians on his financial disclosure forms. (Ex. 15)

35. In addition, tax returns show that he failed to completely disclose investments of more than \$90 million he directed and controlled in Drives LLC and Continental Structured Plastics. (Ex. 15)

36. It is not known what other investments may be in the non-disclosed entities.

Argan, Inc.

37. By way of example, in 2012 Rick Scott filed with the SEC Form 4, Statement of Changes in Beneficial Ownership for Argan, Inc. (NYSE: AGX). (Ex. 16 Argan SEC Form 4, dated 12/21/2012)

38. According to its web site, Argan, Inc. is a publically traded holding company whose “primary business is designing and building energy plants through its Gemma Power Systems subsidiary” which “excels in developing traditional natural gas power plants” and who “also owns Southern Maryland Cable, Inc.” which provides

“comprehensive technology wiring and utility construction solutions” to a wide range of customers” including Governments. Argan’s principal subsidiary, power plant builder Gemma Power Systems, does business in Florida. (Available at: <http://www.arganinc.com>) (last accessed October 7, 2014)

39. Filings with the SEC must be truthful and complete, as shown by the footnote to the signature line on SEC Form 4 which states: "Intentional misstatements or omissions of facts constitute Federal Criminal Violations," and directs attention to 18 U.S.C. 1001 and 15 U.S.C. 78ff(a).

40. Rick Scott identified himself to the SEC as a “Reporting Person” and *stated that he was the beneficial owner* of 10% or more of the outstanding shares of Argan, Inc. (Ex. 16 Argan SEC Form 4, dated 12/21/2012).

41. Rick Scott affirmed to the SEC that his direct beneficial ownership of 1,323,000 shares of Argan stock was comprised of shares indirectly held by the following:

- a. F. Annette Scott Revocable Trust (532,891 shares (40%));
- b. Richard L. & F. Annette Scott Family Partnership (266,445 shares (20%));
- c. Richard L. Scott Blind Trust (523,664 shares (40%));

42. The price of Argan at the close of trading on December 20, 2012, was \$17.99 per share, making Rick Scott’s direct beneficial ownership worth \$23,800,770. (Ex. 17).

43. At year-end 2013, SEC records show Scott with 1,323,000 shares of stock in Argan Inc. Argan stock closed at \$27.56 a share on December 31, 2013, making the

value of the stock \$36,461,880. (Ex.18) On the other hand, Rick Scott's financial disclosure to the citizens of the State of Florida filed under oath (Ex 5 2014 Financial Disclosure, see page 6) reported only \$14,686,476 in Argan stock as of December 31, 2013.

44. Rick Scott's 2014 financial disclosure of \$14,686,476 in Argan stock directly contradicts his SEC filing that he had direct beneficial ownership of 1,323,000 shares worth \$36,461,880.

45. Rick Scott confirmed his beneficial ownership of 1,323,000 shares of Argan stock in a January 22, 2014 report to the SEC that he sold 357,745 shares earlier that month. (Ex. 19 SEC Schedule 13D/A, dated 1/22/2014).

46. Rick Scott was required by the Sunshine Amendment and by statute to disclose to Florida voters a full and public disclosure of [his] financial interests in Argan, Inc. but he did not.

47. Rick Scott's disclosure of less than half of the Argan stock he owned violates the Sunshine Amendment and Section 112.3144, Florida Statutes. (Ex. 7, See Page 2)

Xfone / NTS, Inc.

48. Alan Bazaar, in his capacity as CEO of Hollow Brook Wealth Management, LLC, and in his capacity as "the individual responsible for managing the trust" within the meaning of Section 112.31425(6)(a), Florida Statutes, collectively managed and continues to collectively manage common assets on behalf of Rick Scott's "blind trust" as well as on behalf of the other Scott Trusts and Partnerships.

49. On November 15, 2011 Rick Scott filed SEC Form 4 reporting that he owned 5,011,966 shares of Xfone comprised of shares indirectly held by the following:

- a. F. Annette Scott Revocable Trust: (2,505,974 shares (50%));
- b. Richard L. & F. Annette Scott Family Partnership (1,252,996 shares (25%));
- c. Richard L. Scott Blind Trust (1,252,996 shares (25%));

(Ex. 20 Xfone SEC Form 4, dated 11/15/2011).

50. Previously, Rick Scott reported that he also owned 800,000 shares of derivatives indirectly held by XFN RLSI Investments, LLC. On the same day he filed the Argan Form 5, Rick Scott filed a similar statement of ownership relating to Xfone, where he reported to the SEC that his beneficial ownership in Xfone was comprised of:

- a. 1,252,987 shares indirectly held by the F. Annette Scott Revocable Trust;
- b. 626,498 shares indirectly held by the Richard L. & F. Annette Family Partnership; and
- c. 626,498 shares indirectly held by the Richard L. Scott Revocable Trust.

(Ex. 21 Xfone SEC Form 5, Annual Statement of Changes in Beneficial Ownership, dated 2/15/2011). Rick Scott's ownership interest arose from his ownership of XFN RLSI Investments, LLC. Id.

51. NTS, Inc. is a privately held telecommunications company headquartered in Lubbock, Texas and claims to be one of the leading integrated telecommunications

company in the Southwest receiving more than \$99,900,000 in Federal broadband stimulus funding. (Ex. 22)

52. Xfone Inc. changed its name to NTS Inc. in February 2012. On June 6, 2014, T3 North Intermediate Holdings Inc. completed its acquisition of NTS. NTS now is a wholly owned subsidiary of T3 and no longer is registered on the NYSE. An NTS proxy statement concerning the merger dated January 23, 2014, confirmed that Rick Scott continued to hold NTS stock. The proxy statement stated:

Mr. Bazaar has shared voting and dispositive power over 5,011,966 shares of NTS common stock as ... trustee of a blind trust for the benefit of Mr. Richard L. Scott (the "Scott Blind Trust"), investment adviser of a family partnership controlled by Richard L. Scott's spouse (the "Scott Family Partnership") and a revocable trust for the benefit of Mr. Scott's spouse (the "Scott Revocable Trust"). The Scott Blind Trust, Scott Family Partnership and Scott Revocable Trust (together, the "Scott Trusts") collectively own 5,011,966 shares of NTS common stock.

Ex. 23 (Feb. 26, 2014 Special Meeting Notice, See Page 2) (emphasis added).

53. Merger documents for NTS indicate a valuation of \$2.00 per share as of October 18, 2013. That price and the merger were to be approved at the Special Meeting held on February 26, 2014, referenced above. Under this valuation, Rick Scott's 5,011,966 shares were worth \$10,023,932.

54. On his 2014 Financial Disclosure Rick Scott stated under oath that his holdings in NTS were worth \$2,468,402 as of December 31, 2013. (Ex.5, 2014

Financial Disclosure) Scott understated his interest in the company by more than \$7.5 Million.

55. As with Argan, Rick Scott failed to disclose the NTS shares he owned that were indirectly held by the F. Annette Scott Revocable Trust and the Richard L. & F. Annette Scott Family Partnership when filing his 2014 Financial Disclosure under oath.

56. Rick Scott was required to disclose to Florida voters the totality of his ownership interest in NTS, but he did not. Rick Scott's failure to disclose his complete ownership interest in NTS violates the Sunshine Amendment.

Wireless Telecom Group

57. Wireless Telecom Groups Inc. is a global designer and manufacturer of radio frequency ("RF") and microwave-based products for wireless and advanced communications industries. See, <http://www.wirelesstelecomgroup.com> (last accessed October 7, 2014). It is headquartered in Parsippany, New Jersey. (Ex. 25)

58. In 2008 Rick Scott used "personal funds" to acquire 1,315,930 shares of Wireless Telecom Group, Inc., common stock worth \$2,025,390. (Ex. 25, Schedule 13D, dated June 30, 2008) As the "Reporting Person," Rick Scott stated that "[t]he Common Stock was purchased by three different entities controlled by the Reporting Person, including the Frances Annette Scott Revocable Trust, of which the Reporting Person's spouse is the trustee." Id. (emphasis added).

59. Thus, in July 2008 Rick Scott acquired \$2,025,390 in Wireless Telecom Stock, purchased "by three different entities controlled by the Reporting Person." However, Rick Scott's 2009 "Full" Financial Disclosure only lists \$342,323 of this acquisition, hiding the remainder in "different entities" he controls.

60. By June of 2012 Rick Scott increased his stake to 1,872,265, including shares indirectly held by certain of the Scott Trusts.

61. Rick Scott continued to hold the Wireless Telecom stock in 2014. On April 25, 2014 Wireless Telecom Group confirmed to shareholders that Rick Scott still owned 1,872,265 shares, or 9.7 percent of the shares outstanding – the single largest ownership stake in the company. Ex. 26, Proxy Statement, dated 4/25/2014, at p. 26. The price of Wireless Telecom at the close of trading on December 31, 2013, was \$2.12 per-share, making Rick Scott's stake worth \$3,918,321. (Ex.27)

62. When reporting his finances to Floridians, Rick Scott under-reported his holdings by almost \$3 Million and represented that his Wireless Telecom shares were worth only \$944,384. (Ex. 5, 2014 Financial Disclosure)

63. Rick Scott was required by the Sunshine Amendment and by statute to disclose to Florida voters the totality of his financial interest in Wireless Telecom. Rick Scott's disclosure of only about one fourth of the Wireless Telecom stock he owns and controls is a violation of both the Sunshine Amendment and Section 112.3144, Florida Statutes.

“Blind Trust”

64. Florida's Qualified Blind Trust Law, Section 112.31425, F.S., sets forth requirements and restrictions concerning the creation, operation, and permitted assets of a Blind Trust by public officials. (Ex.7, See Page 6)

65. On June 16, 2014, Rick Scott filed with the Commission on Ethics what purported to be "Qualified Blind Trust" documents that included a list of the assets

placed in his blind trust. He named Hollow Brook Wealth Management, LLC, (Hollow Brook) its trustee. (Ex. 28)

66. The CEO of Hollow Brook is Alan Bazaar, a longtime business associate of Rick Scott. From 1999 until 2010, Bazaar was a managing director and portfolio manager at Richard L. Scott Investments LLC where he co-managed the public equity portfolio and was responsible for all aspects of the investment decision-making process. (Ex. 26, See Page 8) In addition to his role as CEO/partner of Hollow Brook, Bazaar acts as “investment adviser” to at least one trust and a family partnership controlled directly or indirectly by Scott: the revocable trust that benefits Ann Scott and a Scott family partnership. (Ex.23, See Page 2)

67. Section 112.31425(6)(a)(4) provides that the trustee may not be a business associate of the public officer. Clearly Hollow Brook Wealth Management and CEO Alan Bazaar are business associates of the Defendant.

68. Bazaar could not certify in good faith that the Scott blind trust met the requirements of Section 112.31425, F.S., since it failed to list the value of any asset initially placed in the second Scott blind trust. (Ex.7, See Page 6)

69. Bazaar could not certify in good faith that the Second Scott blind trust met the requirements of Section 112.31425, F.S., since the list of initial assets placed in the trust failed to include the name of a single investment in any of the first four brokerage accounts identified.

70. Bazaar knew, or should have known, that the initial assets of the June 16, 2014, blind trust included, among many others, Scott's interests in the following assets: Columbia Collier Management, LLC; G. Scott Capital Partners I, LP; RLSI-CSP Capital

Partners, LLC; RLSI Emida Capital Partners, LLC; Notes & Contract Receivables from S&S Family Entertainment, LLC; Current receivables due from Richard L. & F. Annett Scott Family Partnership, Ltd; and, current receivables due from F. Annette Scott Revocable Trust. (Ex. 28)

71. Each and every one of the nine assets itemized above are assets that are not permitted in a Florida qualified blind trust pursuant to Section 112.31425, Florida Statutes and Bazaar could not in good faith certify that including them met the requirements of Florida law.

72. As a result of the numerous deficiencies, the Qualified Blind Trust filed with the Commission on Ethics on June 16, 2014 failed to comply with Section 112.31425, F.S., and by reason of such failure it was never a "qualified" blind trust and Rick Scott is not entitled to assert any of the benefits of that law.

Declaratory Judgment

73. The Sunshine Amendment guarantees to the Plaintiff, a qualified voter in the State of Florida, the right to timely full financial disclosure of all assets owned or controlled by Rick Scott.

74. Rick Scott has deprived Plaintiff of this constitutional right by failing to disclose hundreds of millions of dollars of financial interests owned by Rick Scott.

75. Rick Scott has attempted to conceal these interests through transfer to several revocable trusts and undisclosed privately owned business entities.

76. A bona fide, actual, present and practical need for the declaration exists. Absent the declaration, Plaintiff and all other Florida voters will be denied a right provided for under the Florida Constitution.

77. The requested declaration concerns a present, ascertainable state of facts and/or present controversy concerning a state of facts, as set forth in the preceding paragraphs.

78. There exists a present, actual, bona fide, controversy as to the parties' rights and obligations with respect to disclosure of Rick Scott's financial interests, which is before the court by proper process.

79. The relief sought is not merely an advisory opinion.

80. There exists no remedy at law.

81. The right of Plaintiff to full and public disclosure of Rick Scott's financial interests is dependent upon application of the law to these facts.

WHEREFORE, Plaintiff seeks:

(a) A declaration that Rick Scott violated the Sunshine Amendment and implementing statutes by failing to provide full and public disclosure of his financial interests;

(b) A declaration that Rick Scott has failed to satisfy the criteria required by Section 112.31425, Florida Statutes, to establish a qualified blind trust; and that by reason of such failure, Rick Scott is not entitled to any of the benefits of the Blind Trust Law and must make full disclosure;

(c) A temporary and permanent mandatory injunction order compelling Rick Scott to comply with the Sunshine Amendment by filing corrected financial disclosure

