

APR 24 2026

**BEFORE THE
STATE OF FLORIDA
COMMISSION ON ETHICS**

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In re: Lynn Stoner,

Respondent.

Complaint No.: 23-255

ADVOCATE'S RECOMMENDATION

The undersigned Advocate, after reviewing the Complaint and Report of Investigation filed in this matter, submits this Recommendation in accordance with Rule 34-5.006(3), F.A.C.

RESPONDENT/COMPLAINANT

Respondent, Lynn Stoner, served as mayor for Plantation, Florida. Complainant is Special Agent William Cates, of the Broward County Office of the Inspector General.

JURISDICTION

The Executive Director of the Commission on Ethics determined that the Complaint was legally sufficient and ordered a preliminary investigation for a probable cause determination as to whether Respondent violated Section 112.313(6), Florida Statutes. The Commission on Ethics has jurisdiction over this matter pursuant to Section 112.322, Florida Statutes.

The Report of Investigation was released on April 8, 2026.

ALLEGATION

Respondent is alleged to have violated Section 112.313(6), Florida Statutes, by using her public position and/or public resources to secure a special privilege, benefit, and or exemption for herself and/or another.

APPLICABLE LAW

Section 112.313(6), Florida Statutes, provides as follows:

MISUSE OF PUBLIC POSITION. No public officer, employee of an agency, or local government attorney shall corruptly use or attempt to use his or her official position or any property or resource which may be within his or her trust, or perform his or her official duties, to secure a special privilege, benefit, or exemption for himself, herself, or others. This section shall not be construed to conflict with s. 104.31.

The term “corruptly” is defined by Section 112.312(9), Florida Statutes, as follows:

“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 a public servant which is inconsistent with the proper performance of his or her public duties.

In order to establish a violation of Section 112.313(6), Florida Statutes, the following elements must be proved:

1. Respondent must have been a public officer or employee.
2. Respondent must have:
 - a) used or attempted to use his or her official position or any property or resources within his or her trust,
 - or
 - b) performed his or her official duties.
3. Respondent’s actions must have been taken to secure a special privilege, benefit or exemption for him- or herself or others.
4. Respondent must have acted corruptly, that is, with wrongful intent and for the purpose of benefiting him- or herself or another

person from some act or omission which was inconsistent with the proper performance of public duties.

ANALYSIS

In 2011, Respondent was first elected as a member of the Plantation City Council. (ROI 12) She continuously served in that capacity until she was elected as mayor, serving from November 2018 through November 2022 when she was not reelected. (ROI 12) The City operates as a “strong mayor” form of government and Respondent is responsible for the City administration. (ROI 12)

In addition, Respondent serves as President of Stoner Construction, Inc., a Florida Profit Corporation, with an initial incorporation date of March 5, 2004. (ROI 18) She held an active Florida Real Estate Broker or Sales License, with an initial licensure date of March 19, 1990, through March 31, 2024 and holds an active Certified General Contractor License, with an initial licensure date of July 9, 2004, and an expiration date of August 31, 2026. (ROI 17, Exhibit D1-D2)

Invesca Firm was founded by Christopher Longworth. (ROI 19) Longworth also served as the Registered Agent and Managing Officer of Strata Group, LLC, a part of the Invesca portfolio that held various building projects in the City including Strata at Plantation and PIXL at Plantation. (ROI 2, 19)

The complaint alleges that Strata Group had a pending code enforcement case with the City with a fine that accrued to \$181,500. (ROI 2) It is alleged Respondent contacted then-City Building Official Adnan Ezzeddine to request that he write a letter to Longworth’s bank stating that Strata Group had resolved the code violations related to the subject property and that the City had discharged the fines. (ROI 4) When Ezzeddine refused to write the letter, Respondent “drafted” it herself and submitted it to Longworth for his use/benefit. (ROI 5-7)

The Broward County Office of Inspector General (BOIG) investigated the matters contained in this complaint and conducted a sworn interview with Ezzeddine on January 24, 2023 as did the Broward County Office of the State Attorney.¹ (ROI 13, Exhibit B) The COE investigation incorporates information from both interviews. (ROI 20)

The City lien at issue concerned a 2016 permit issued for interior building work at the property which housed Longworth's Strata office headquarters. (ROI 21) The permit expired on March 2, 2018 and a City building inspector posted a notice of violation on the Strata property which instructed the owner to obtain the necessary permits. (ROI 21) On March 14, 2018, the Special Magistrate issued a Final Order finding Strata Group LLC did not appear at the hearing and the property remained in non-compliance. (ROI 21) The Final Order required Strata Group to comply with the City Code of Ordinances or be subject to a \$250.00 fine for each day the Developer remained out of compliance. (ROI 21) On May 16, 2018, the Special Magistrate entered a Supplemental Order/Claim of Lien finding the Developer failed to comply with the Final Order and that a fine of \$250.00 per day be specified, until such time as the Strata Group complied with the Final Order. (ROI 21, Exhibit E1-E9)

Ezzeddine advised that prior to him becoming the Building Inspector, Longworth finished the building that housed his office (Strata) and that he did so without obtaining the required Certificate of Occupancy. (ROI 22) Ezzeddine informed Longworth that he must clear up the violations and pay the fines for the Certificate of Occupancy to be issued. (ROI 22) Longworth refused and indicated Respondent would take care of it. (ROI 22, 23)

In 2019, Longworth began seeking financing for the PIXL Project, an apartment development component of the Strata Group. (ROI 25) On August 20, 2019, Longworth emailed

¹ The BOIG released its final report on July 25, 2023. (ROI 13, Exhibit A)

the City's landscape reviewer stating he was surprised to find a lien on the associated records and that the company had complied with all City standards. (ROI 25) In response, City staff advised him that his landscaping violations were cleared and the violation was regarding the Strata lien. (ROI 25) Longworth then forwarded the email string to Ezzeddine denying knowledge of the lien and advising it was holding up the initial underwriting of the loan for the PIXL Project. (ROI 25, Exhibit F1-F3) In February 2020, Longworth's title company advised Ezzeddine that the City lien on Strata needed to be resolved for the PIXL Project to move forward. (ROI 26)

On April 8, 2020, Longworth emailed two letters to Respondent's City email address with the subject "Draft of code case." (ROI 27) The email read, "This is what barry [sic] sent..." (ROI 27, Exhibit F5) "Barry" is identified as the general counsel for Strata and the personal attorney for Longworth. (ROI 27, FN 2) On April 9, 2020, Respondent forwarded the letter to City Clerk Susan Slattery, requesting her to "get me the info re the CE please." (ROI 27, Exhibit F7) Slattery provided the requested information. (ROI 27)

On April 9, 2020, Respondent called Ezzeddine requesting that he absolve Longworth of any code violations and any monies owed to the City. (ROI 28) Respondent asked Ezzeddine to void the violation and to write a letter to Longworth's bank advising that the code violations were resolved and the fines discharged. (ROI 28) Ezzeddine informed Respondent that it was inappropriate for him to sign a letter that would facilitate issuance of a loan when the violations were not corrected. (ROI 28) Respondent replied, "OK, I will write the letter." and hung up the phone. (ROI 28)

Later that day, Respondent's Chief Administrative Officer, Jason Nunemaker, sent Ezzeddine a letter that Respondent had written and signed. (ROI 29, Exhibit F13) The letter provided in part,

The developer [Strata Group LLC] has established to the satisfaction of the City of Plantation that the conditions for which the accrual of fines arose, have been corrected and eliminated.

(Exhibit F13)

Ezzeddine advised that after reading Respondent's letter, he explained to Nunemaker that no elected or appointed official can waive a code violation and to do so would violate Florida Building Codes. (ROI 29) He told Nunemaker, "This is insane, you guys are insane, this is illegal, and I do not want to have any part of it." (ROI 29)

On April 9, 2020, Nunemaker emailed the letter, that was prepared on City letterhead and signed by Respondent, to Longworth. (ROI 30, Exhibit F11-F12) On April 9, 2020, Longworth forwarded the email and attachment to Fidelity National Title, which subsequently authorized and disbursed loan proceeds of \$95,000,000.00 and \$7,000,000.00 to Longworth. (ROI 30)

Ezzeddine advised that Respondent had no authority to produce such a letter, she was not the building official authorized to draft such a letter, and that a building code violation cannot be removed arbitrarily. (ROI 31)

On May 23, 2023, Third Degree Felony charges were filed against Respondent, including Official Misconduct (Section 838.022(1), Florida Statute, and Falsifying Records (Section 839.13, Florida Statutes), and two counts of First Degree Misdemeanor charges of Falsely Holding Himself or Herself Out as a Certificate Holder (Section 468.629(1)(a), Florida Statutes. (ROI 15, Exhibit C1)

On February 24, 2026, Respondent entered a plea of Nolo Contendere to Count 1, Official Misconduct and to Counts 3 and 4, Influence a Building Official to Violate Florida Statutes. (ROI 44) The Court withheld adjudication and placed Respondent on probation for 12 months, with each count to run concurrently, and allowing Respondent to ask the court for early termination at

six months. (ROI 44) A Nolle Prosequi was issued on the charge of Falsification of Records.
(ROI 44, Exhibit C)

Respondent declined to be interviewed for this investigation. (ROI 11)

Respondent corruptly used her public position and public resources to secure a benefit, privilege, and/or exemption for Longworth and/or Strata Group in a manner that was inconsistent with the proper performance of her public duties.

Therefore, based on the evidence before the Commission, I recommend that the Commission find probable cause to believe that Respondent violated Section 112.313(6), Florida Statutes.

RECOMMENDATION

It is my recommendation that:

There is probable cause to believe that Respondent violated Section 112.313(6), Florida Statutes, by using her public position and/or public resources to secure a special privilege, benefit, and/or exemption for herself and/or another.

Respectfully submitted this 24th day of April, 2026.


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