

DATE FILED

APR 24 2026

BEFORE THE
STATE OF FLORIDA
COMMISSION ON ETHICS

COMMISSION ON ETHICS

CONFIDENTIAL

In re LYNN STONER,

Respondent.

Complaint No. 23-255

SECOND AMENDED DETERMINATION OF INVESTIGATIVE JURISDICTION
AND ORDER TO INVESTIGATE¹

UPON REVIEW of this complaint, I find as follows:

1. This complaint was filed by Special Agent William Cates of the Broward County Office of the Inspector General.
2. Respondent, Lynn Stoner, allegedly served as the Mayor of the City of Plantation.
3. The complaint alleges Respondent knowingly authored and signed, in her official capacity and on behalf of the City, an inaccurate letter in order to benefit a local developer. Per the complaint, the letter stated that the private development group, Strata Group, LLC, had corrected violations outlined in an ongoing code enforcement case and, as a result, the City had waived Strata Group, LLC's, accrued fines. The complaint contends that, as a result of the allegedly fraudulent letter, Strata Group, LLC, was able to obtain construction loans in excess of \$95 million.
4. This indicates possible violation of Section 112.313(6), Florida Statutes.

¹ This first amendment was due to the retroactive application of the 2024 amendment to Section 112.324(1)(a), Florida Statutes, which requires allegations investigated by the Commission to be "based upon personal knowledge or information other than hearsay." See Jennings v. Fla. Elections Comm'n, 932 So. 2d 609, (Fla. 2d DCA 2006) (quoting Bruner v. United States, 343 U.S. 112, 116-17 (1952) ("[W]hen a law conferring jurisdiction is repealed without any reservation as to pending cases, all cases fall within the law.")).

The second amendment is to remove an erroneous citation on page 4.

5. The Commission on Ethics has jurisdiction to investigate only those allegations "based upon personal knowledge or information other than hearsay." § 112.324(1)(a), Fla. Stat. The complaint includes a link to the Investigative Report completed by the Broward County Office of the Inspector General. While the text of the Report itself amounts to inadmissible hearsay, the Report includes a number of exhibits, and many of those exhibits are likely admissible pursuant to various exceptions to the hearsay rule. For example, the allegedly fraudulent letter itself would likely be admissible pursuant to either the business records exception or admissions exception to the hearsay rule. §§ 90.803(6), (18), Fla. Stat. The Report also attaches as Exhibit 2 the Articles of Incorporation for Strata Group, LLC, and as Exhibit 18 the ALTA commitment for title insurance issued by Fidelity National Title Insurance Company; these documents likely would be admissible under the business records exception to the hearsay rule. § 90.803(6), Fla. Stat. It also attaches as exhibits a number of orders of a special magistrate regarding the lien placed against the land on which Strata Group's code enforcement violations existed, which would likely be admissible pursuant to the public records exception to the hearsay rule, the records of documents affecting an interest in property exception to the hearsay rule, and the statements in documents affecting an interest in property hearsay rule: Exhibit 10 (Final Order of the Special Magistrate dated March 14, 2018); Exhibit 11 (Supplemental Order/Claim of Lien from the Special Magistrate dated May 16, 2018); Exhibit 12 (Supplemental Order/Claim of Lien from the Special Magistrate dated May 16, 2018); and Exhibit 15 (Order on Request for Reduction of Fine dated July 21, 2021). §§ 90.803(8), (14), (15), Fla. Stat. Additionally, the Report attaches as exhibits a number of the City of Plantation's internal records, which would likely be admissible pursuant to the public records exception to the hearsay rule: Exhibit 8 (City of Plantation Notice of Violation dated February 28, 2018); Exhibit 9 (City of Plantation Amended Notice of Violation dated March 6, 2018); Exhibit

13 (the City's internal records indicating a permit was issued on May 27, 2021); Exhibit 14 (the City of Plantation Financial Services' intra-office memorandum noting Strata Group, as of June 18, 2021, owed 4284,750 with additional out-of-pocket costs of the City of \$962.85); and Exhibit 16 (Release of Municipal Lien dated September 9, 2021). Additionally, the Report includes as attachments a number of e-mails from Respondent, which would likely be admissible pursuant to the admissions exception to the hearsay rule. § 90.803(18), Fla. Stat. Finally, the Report includes as attachments a number of e-mails from Christopher Longworth, the registered agent of the Strata Group, LLC; because Mr. Longworth is now deceased, and because the complaint alleges Respondent worked together with Mr. Longworth in furtherance of the Strata Group's development goals, these e-mails would likely be admissible pursuant to the statements against interest exception to the hearsay rule. § 90.804(2)(b), Fla. Stat.

6. The remaining allegations in the complaint are not sufficient to form the basis of an investigation.

7. The complaint contends Respondent unlawfully attempted to influence the city's building official to violate his statutory duties under the Florida Building Code on two separate occasions.

8. First, the complaint alleges Respondent attempted to persuade the building official to write and sign the letter fraudulently declaring the Strata Group had resolved all code enforcement issues and the resulting lien. This allegation does not appear to be based on personal knowledge or information other than hearsay as required by Section 112.324(1)(a). The allegation stems from the claim that Respondent called the building official, Dan Ezzeddine, to ask him for a "favor." However, the complaint fails to indicate whether Complainant authored or investigated the Report from the Broward County Office of the Inspector General, so it is impossible for the

Commission to determine whether he has personal knowledge of the phone call at issue. Additionally, no documents attached to the Report that likely fall within a hearsay exception support the existence of a such a phone call. Thus, this allegation is not sufficient for investigation.

9. Second, the complaint contends that, after Strata Group, LLC, obtained the funding for the project, the developer began working on the project without the appropriate permits. When the building official became aware that work had improperly begun, Respondent allegedly attempted to coerce the building official to ignore the alleged code enforcement violations and/or push the permitting through with urgency. When the building official failed to do so, Respondent allegedly fired him. This allegation also does not appear to be based on personal knowledge or information other than hearsay as required by Section 112.324(1)(a). Again, the complaint fails to indicate whether Complainant authored or investigated the Report from the Broward County Office of the Inspector General, so it is impossible for the Commission to determine whether he has personal knowledge of any of the claims. Additionally, no documents attached to the Report that likely fall within a hearsay exception support the Respondent's alleged inappropriate coercion and resulting termination of the building official. Thus, this allegation is not sufficient for investigation.

WHEREFORE staff of the Commission on Ethics shall conduct a preliminary investigation of this complaint for a probable cause determination of whether Respondent has violated Sections 112.313(6) of the Florida Statutes, as set forth above.

April 24, 2020
Date
Kerrie J. Stillman
Kerrie J. Stillman
Executive Director

KJS/sen