

JUN 01 2026

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

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**In re: Jennifer Liotta,
Respondent.**

Complaint No. 25-304

**PRE-PROBABLE CAUSE
JOINT STIPULATION OF FACT, LAW, AND RECOMMENDED ORDER**

Respondent, Jennifer Liotta, and the Advocate for the Florida Commission on Ethics enter into this Pre-Probable Cause Joint Stipulation of Fact, Law, and Recommended Order with respect to the above-styled Complaint. Subject to acceptance by the Commission on Ethics, the parties agree that they enter into this stipulated settlement in lieu of further hearings in this cause. The parties stipulate as follows:

STIPULATED FINDINGS OF FACT

1. Respondent served as a Board Member of the St. John's County Airport Authority in St. John's County, Florida, and therefore is subject to the provisions of the Code of Ethics for Public Officers and Employees, Part III, Chapter 112, Florida Statutes.
2. On October 23, 2025, a sworn Complaint was filed with the Commission on Ethics alleging that Respondent violated the Code of Ethics. An amendment to the Complaint was filed on October 27, 2025.
3. Pursuant to Section 112.322, Florida Statutes, the Executive Director of the Commission on Ethics found that the Complaint was legally sufficient and ordered a preliminary investigation of the Complaint for a probable cause determination of whether Respondent had violated the Code of Ethics. The Report of Investigation was released on April 17, 2026.

4. The allegations are:

- I. Respondent violated Section 112.313(7)(a), Florida Statutes, by having an employment and/or contractual relationship with Volato, Inc., which was subject to the regulation of and/or doing business with her agency.
- II. Respondent violated Section 112.313(7)(a), Florida Statutes, by having an employment and/or contractual relationship with Modern Aero, LLC., which was subject to the regulation of and/or doing business with her agency.
- III. 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.
- IV. Respondent violated Article II, Section 8(h)(2), Florida Constitution, by using her position to obtain a disproportionate benefit for herself and/or another.
- V. Respondent violated Section 112.313(4), Florida Statutes, by accepting, or by her spouse accepting, compensation, payment, or a thing of value that was given to influence an official action.

5. On April 28, 2026, the Advocate filed his Advocate's Recommendation in this case recommending that the Commission find probable cause to believe Respondent violated the Code of Ethics as described in Allegations I, II, III, and IV, and that the Commission find no probable cause to believe that Respondent violated the Code of Ethics as described in Allegation V.

6. Respondent admits the facts as set forth in the Report of Investigation as to Allegations I and II, and denies Allegations III, IV, and V, as incorporated by reference in this Joint Stipulation. During her tenure on the Airport Authority Board, Respondent repeatedly noted her relationship with Volato, Inc. and Moderns Aero, LLC. and her efforts to avoid conflicts. However, none of the attorneys for the Airport Authority Board advised her that she had a possible conflict pursuant to Section 112.313(7)(a), Florida Statutes. However, Respondent understands that it was her responsibility to comply with the Code of Ethics.

7. Respondent and the Advocate agree that further proceedings regarding Allegations III, IV, or V would not serve the public interest.

STIPULATED CONCLUSIONS OF LAW

8. Respondent is subject to the provisions of Part III, Chapter 112, Florida Statutes, the Code of Ethics for Public Officers and Employees.

9. The Commission on Ethics has jurisdiction over the Complaint as filed in this proceeding and over Respondent.

10. Respondent admits Allegations I and II as set forth in paragraph four (4) of the Stipulated Findings of Fact above.

11. Respondent violated Section 112.313(7)(a), Florida Statutes, by having an employment and/or contractual relationship with Volato, Inc., which was subject to the regulation of and/or doing business with her agency.

12. Respondent violated Section 112.313(7)(a), Florida Statutes, by having an employment and/or contractual relationship with Modern Aero, LLC., which was subject to the regulation of and/or doing business with her agency.

STIPULATED RECOMMENDED ORDER

13. The Advocate accepts Respondent's admission in this proceeding.

14. The Advocate and Respondent have entered into this Joint Stipulation and urge the Commission on Ethics to approve it in lieu of further hearings in this case.

15. Therefore, the parties request and the Advocate recommends that:

- (a) The Commission on Ethics approve this Joint Stipulation, embodying the stipulations, admissions, and recommendations of the parties;
- (b) The Commission on Ethics dismiss Allegations III, IV, and V;
- (c) The Commission on Ethics enter a Final Order and Public Report finding

that Respondent violated Section 112.313(7)(a), Florida Statutes, and recommending:

- (i) a civil penalty of \$1,000 in Allegation I, and
- (ii) \$1,000 in Allegation II.

FURTHER STIPULATIONS

16. Respondent and the Advocate stipulate and covenant that they have freely and voluntarily entered into this Pre-Probable Cause Joint Stipulation of Fact, Law, and Recommended Order with full knowledge and understanding of its contents. Respondent and the Advocate further stipulate and covenant that this Joint Stipulation constitutes the full agreement of the parties and that there are no oral or written understandings between the parties other than those contained in this Pre-Probable Cause Joint Stipulation of Fact, Law, and Recommended Order.

17. Respondent and the Advocate stipulate and covenant that, in consideration of the provisions of this Pre-Probable Cause Joint Stipulation of Fact, Law, and Recommended Order, they accept and will comply with the above-referenced Final Order and Public Report of the Commission on Ethics.

18. Respondent and the Advocate stipulate that this Pre-Probable Cause Joint Stipulation of Fact, Law, and Recommended Order is submitted to the Commission on Ethics for its consideration and ratification. In the event that it is not approved by the Commission on Ethics as written, this document shall be of no purpose and effect and shall not be deemed an admission by Respondent.

19. Respondent enters into this Joint Stipulation with the understanding of the seriousness of the allegations and gives her assurance that this proceeding has affected the manner in which she conducts herself as a public official in a positive way.

20. Effective upon approval of this Pre-Probable Cause Joint Stipulation of Fact, Law,

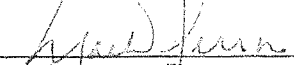
and Recommended Order by the Commission on Ethics, Respondent waives all time, notice, hearing rights, requirements, and entitlements, as to all subsequent hearings in this proceeding. By her signature hereto, Respondent waives any and all confidentiality with respect to these proceedings.

Signed, dated, and entered into:
this 15th day of June, 2026.



Joseph C. Burns, Esq.
Advocate for the Florida
Commission on Ethics
Florida Bar No. 1023385
Office of the Attorney General
The Capitol, PL-01
Tallahassee, FL 32301
(850) 414-3300

Signed, dated, and entered into:
this 15th day of June, 2026.



Mark Herron, Esq.
Attorney for Respondent
Florida Bar No. 199737
Messer Caparello P.A.
2618 Centennial Place
Tallahassee, FL 32308
(850) 222-0720

Signed, dated, and entered into:
this 15th day of June, 2026.



Jennifer Liotta
Respondent