

MAY 18 2026

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

RECEIVED

Complaint No. 25-304

In Re: Jennifer Liotta,

Respondent

Response to Advocate's Recommendation

Jennifer Liotta, through undersigned counsel, submits this Response to the Advocate's Recommendation, pursuant to Rule 34-5.006(3), Florida Administrative Code.

Introduction

With respect to the instant complaint, the Advocate has recommended the following:

- Allegation One: There is **probable cause** to believe that 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. (AR 13)
- Allegation Two: There is **probable cause** to believe that 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. (AR 13)

- Allegation Three: 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. (AR 13)
- Allegation Four: There is **probable cause** to believe that Respondent violated Article 11. Section 8(h)(2). Florida Constitution, by using her position to obtain a disproportionate benefit for herself and /an another. (AR 13)
- Allegation Five: There is **no probable cause** to believe that Respondent violated Section 112.313(4), Florida Statutes. by accepting, or by her spouse accepting. compensation. payment. or a thing of that was given to influence an official action. (AR 13)

Each of the Advocate's Recommendations will be addressed in turn.

Allegation One
Conflicting Employment of Contractual or
Employment Relationship

It is alleged that Ms. Liotta 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.

Ms. Liotta acknowledges that she stated that she was an employee of Volato, Inc. and was a shareholder in Volato, Inc. (ROI ¶¶ 16-17.) Ms. Liotta also acknowledges that the St. John's County Airport Authority entered into agreements with Volato, Inc. while she was a member of St. John's County Airport Authority Board. (ROI ¶¶ 22,28, and 39.)

When she disclosed her relationship with Volato, Inc., Ms. Liotta stated: “Should there ever be a matter before this board that would create a conflict, I would disclose my conflict before any vote was taken and recuse myself from that vote in accordance with Florida ethics statutes.” (ROI ¶16.) With respect to matters coming before the Board, Ms. Liotta filed the required Form 8B Memorandum of Voting Conflict for her abstentions from Airport Authority Board votes on April 8, 2024, May 13, 2024, and January 13, 2025, on May 2, 2025. (ROI ¶18.)

Allegation Two
Conflicting Employment of Contractual or
Employment Relationship

It is alleged that Ms. Liotta 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.

While the Advocate states that Ms. Liotta admitted being an owner of Modern Aero, LLC (AR 5), corporate records indicate that Ms. Liotta was not a member or manager of Modern Aero, LLC subsequent to taking office on January 4, 2023, St. John's County Airport Authority. See Exhibit A.

When she disclosed her relationship with Modern Aero, LLC, Ms. Liotta stated: “In the case of Modern Aero, I only hold an indirect ownership interest. I am not an employee and I -- and I do not run that busi- -- excuse me, do not have management control over that company.” Corporate records indicate that Modern Aero, LLC has two authorized members, neither of which are Ms. Liotta.

One of the authorized members is Argand Group LLC.(ROI ¶12.) Mrs. Liotta is the sole Manager of Argand Group.

Ms. Liotta does not have an employment or contractual relationship with Modern Aero, LLC. She has a contractual relationship with Argand Group LLC, which in turn has a legal relationship with Modern Aero, LLC.

Thus, a necessary element to establish a violation of Section 112.313(7)(a) is lacking, i.e., "Respondent must have been employed by or have had a contractual relationship with a business entity" which was subject to the regulation of or doing business with the St. John's County Airport Authority.

Allegation Three
Misuse of Public Position

It is alleged that Ms. Liotta 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.

Within the ambit of this allegation is a claim for attorneys' fees incurred by Modern Aero LLC in its litigation against the St. John's County Airport Authority. Also within the ambit of this allegation is a rent credit agreement for repairs to the Casa Cola Hangar. (ROI ¶¶ 41-48.) Interim Executive Director Jamie Topp stated that he discussed this issue with Ms. Liotta. (AR 8.) The Advocate's statements regarding Mr. Topp's discussions with Ms. Liotta glosses over vague nature of Mr. Topp's recollection.

Mr. Topp stated regarding these negotiations, "In that process with Matt [Liotta] mostly, I think Jennifer [Respondent] may have stopped by to, to just ask me about it or whatever, but I don't recall for sure." Mr. Topp further stated "She was involved in that. I don't know if

she was the lead on that. I can't remember the sequence of how it started."

(ROI ¶42.)

Ms. Liotta stated that "she was "absolutely not" involved in any way in Matt Liotta's solicitation or discussion of legal fees with Mr. Topp, and she did not believe this had any connection to the rent credit agreement for repairs to the Casa Cola Hangar, as alleged by the Complainant." (ROI ¶58.)

Finally, the Advocate includes within the ambit of this allegation that Ms. Liotta "offered to pay the legal fees of any of the Airport Authority's employees who were willing to come forward and make statements against Complainant, who is the one who terminated the business with her company." (AR 10.)

The context within which this request was made reveals that this request by Ms. Liotta had no connection to Modern Aero LLC, or the termination of Modern Aero's T-Hangar leases, or any litigation. Ms. Liotta provided a series of email messages between herself and Airport Authority Aviation Attorney Chad Roberts and other staff members. (See ROI Exhibit E.) These emails reflect that Ms. Liotta contacted Attorney Roberts on March 20, 2025 regarding rumors that documents were being improperly shredded at the airport. (ROI ¶61; ROI Exhibit E 9-10.)

In an email dated March 24, 2025, Ms. Liotta formally documented her serious concerns regarding the Airport Authority's recent handling of public records, particularly with regard to records destruction and compliance with Florida's statutory retention requirements." (ROI Exhibit E 2-6.)

The request to staff members stating that if they wanted to provide affidavits to Woolsey Morcom's law offices and that Ms. Liotta would pay the expenses associated with providing an affidavit arose in the context of the Complainant maintaining two full-time jobs after being hired by the Board. (AR 9; ROI ¶58.) Similarly, in an email to staff, Ms. Liotta stated;

As you are aware, the airport has previously settled litigation involving allegations of retaliatory termination after a staff member lodged complaints against Mr. Pittman In fact, to ensure staff and former employees can speak freely without fear of retaliation -- find it -- or a financial burden, I recently agreed to cover legal expenses for a former employee to provide an affidavit containing allegations regarding Mr. Pittman's conduct.

and

To any current staff included in this e-mail, if you have legitimate concerns related to document handling or other matters that you are uncomfortable raising internally, I will support your right to come forward. If legal representation is needed to do so safely, I am willing to help ensure that access is available.

Thus, the context within which these emails were sent by Ms. Liotta reveal that they were not made with wrongful intent; nor were they inconsistent with the proper performance of her duties as a member of the St. John's County Airport Authority.

Accordingly, there is no probable cause to believe that Ms. Liotta 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.

Allegation Four
Use of Position to Obtain a Disproportionate Benefit

It is alleged that Ms. Liotta violated Article II, Section 8(h)(2), Florida Constitution, by using her position to obtain a disproportionate benefit for herself and/or another.

The pertinent facts and circumstances relating to this allegation are set forth in the response to Allegation Three above.

The context within which these emails were sent by Ms. Liotta reveal that they were not made with wrongful intent; nor were they inconsistent with the proper performance of her duties as a member of the St. John's County Airport Authority.¹

Accordingly, there is no probable cause to believe that Ms. Liotta violated Article II, Section 8(h)(2), Florida Constitution, by using her position to obtain a disproportionate benefit for herself and/or another.

Allegation Five
Unauthorized Compensation

It is alleged that Ms. Liotta 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.

As noted by the Advocate, there is no evidence to support this allegation.

¹ See CEO 19-23 (the intent requirement of Article II, Section 8(h)(2), Florida Constitution, require "require an act or omission committed with a 'wrongful intent' and for the purpose of obtaining a result' inconsistent with the proper performance' of one's public duties.")

There does not appear to be any indication that Ms. Liotta's voted to change Mr. Topp's title from Interim Executive Director to Executive Director was related to the rent credit arrangement between the Airport Authority and Modern Aero, LLC. Nor does there appear to be any indication that Ms. Liotta or her spouse accepted something with the understanding that it was meant to influence some official action by Ms. Liotta. (AR 12.)

Consistent with the Advocate's Recommendation, there is no probable cause to believe that Ms. Liotta violated Section 112.313(4), Florida Statutes. by accepting, or by her spouse accepting. compensation. payment. or a thing of that was given to influence an official action.

Conclusion

Based on the foregoing, the Commission should:

- **Allegation One:** Concur in the Advocate's Recommendation that there is **probable cause** to believe that Ms. Liotta 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.
- **Allegation Two:** Concur in the Advocate's Recommendation that there is **probable cause** to believe that Ms. Liotta 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.

- **Allegation Three:** Reject the Advocate's Recommendation that there is probable cause to believe that Ms. Liotta 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.

Instead, the Commission should find that there is **no probable cause** to believe that Ms. Liotta violated Section 112.313(6), Florida Statutes, as the context within which these emails were sent by Ms. Liotta reveal that they were not made with wrongful intent; nor were they inconsistent with the proper performance of her duties as a member of the St. John's County Airport Authority.

- **Allegation Four:** Reject the Advocate's Recommendation that there is probable cause to believe that Ms. Liotta violated Article II, Section 8(h)(2), Florida Constitution, by using her position to obtain a disproportionate benefit for herself and/or another.

Instead, the Commission should find that there is **no probable cause** to believe that Ms. Liotta violated Article II, Section 8(h)(2), Florida Constitution, as the context within which these emails were sent by Ms. Liotta reveal that they were not made with wrongful intent; nor were they inconsistent with the proper performance of her duties as a member of the St. John's County Airport Authority.

- **Allegation Five:** Concur in the Advocate's Recommendation that there is **no probable cause** to believe that Ms. Liotta violated Section 112.313(4),

Florida Statutes. by accepting, or by her spouse accepting, compensation.
payment, or a thing of that was given to influence an official action.

Respectfully submitted on this 18th day of May 2026 by:

/s/ Mark Herron
Mark Herron
Florida Bar No.: 0199737
MESSER CAPARELLO, P.A.
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Tallahassee, FL 32308
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Email: mherron@lawfla.com

2022 FLORIDA LIMITED LIABILITY COMPANY AMENDED ANNUAL REPORT

DOCUMENT# L21000083892

Entity Name: MODERN AERO, LLC**Current Principal Place of Business:**4738 CASA COLA WAY
ST AUGUSTINE, FL 32095**Current Mailing Address:**4738 CASA COLA WAY
ST AUGUSTINE, FL 32095 US**FEI Number:** 86-2332007**Certificate of Status Desired:** Yes**Name and Address of Current Registered Agent:**LUDWIG HULSEY, P.A.
5150 BELFORT ROAD, BLDG. 500
JACKSONVILLE, FL 32256 US*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.***SIGNATURE:**

Electronic Signature of Registered Agent

Date

Authorized Person(s) Detail :

Title AUTHORIZED MEMBER
Name ARGAND GROUP, LLC
Address 2220 COUNTY ROAD 210 W, SUITE
108, PMB 132
City-State-Zip: JACKSONVILLE FL 32259

Title MANAGER
Name LIOTTA, MATTHEW
Address 4738 CASA COLA WAY
City-State-Zip: ST AUGUSTINE FL 32095

Title MANAGER
Name KREIS, BRUCE
Address 4738 CASA COLA WAY
City-State-Zip: ST AUGUSTINE FL 32095

Title AUTHORIZED MEMBER
Name JEL AIR LLC
Address 130 S END ST
City-State-Zip: ST. AUGUSTINE FL 32095

Title MANAGER
Name LAWSON, JIM
Address 4738 CASA COLA WAY
City-State-Zip: ST AUGUSTINE FL 32095

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 605, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: JENNIFER LIOTTA**AUTHORIZED PERSON****11/11/2022**

Electronic Signature of Signing Authorized Person(s) Detail

Date

EXHIBIT A

2023 FLORIDA LIMITED LIABILITY COMPANY ANNUAL REPORT

DOCUMENT# L21000083892

Entity Name: MODERN AERO, LLC**Current Principal Place of Business:**4738 CASA COLA WAY
ST AUGUSTINE, FL 32095**Current Mailing Address:**4738 CASA COLA WAY
ST AUGUSTINE, FL 32095 US**FEI Number:** 86-2332007**Certificate of Status Desired:** No**Name and Address of Current Registered Agent:**LUDWIG HULSEY, P.A.
5150 BELFORT ROAD, BLDG. 500
JACKSONVILLE, FL 32256 US*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.***SIGNATURE:**

Electronic Signature of Registered Agent

Date

Authorized Person(s) Detail :

Title AUTHORIZED MEMBER
Name ARGAND GROUP, LLC
Address 2220 COUNTY ROAD 210 W, SUITE
108, PMB 132
City-State-Zip: JACKSONVILLE FL 32259

Title MANAGER
Name LIOTTA, MATTHEW
Address 4738 CASA COLA WAY
City-State-Zip: ST AUGUSTINE FL 32095

Title MANAGER
Name KREIS, BRUCE
Address 4738 CASA COLA WAY
City-State-Zip: ST AUGUSTINE FL 32095

Title AUTHORIZED MEMBER
Name JEL AIR LLC
Address 130 S END ST
City-State-Zip: ST. AUGUSTINE FL 32095

Title MANAGER
Name LAWSON, JIM
Address 4738 CASA COLA WAY
City-State-Zip: ST AUGUSTINE FL 32095

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 605, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: BRUCE KREIS

MANAGER

01/23/2023

Electronic Signature of Signing Authorized Person(s) Detail

Date

2024 FLORIDA LIMITED LIABILITY COMPANY ANNUAL REPORT

DOCUMENT# L21000083892

Entity Name: MODERN AERO, LLC

Current Principal Place of Business:

4738 CASA COLA WAY
ST AUGUSTINE, FL 32095

Current Mailing Address:

4738 CASA COLA WAY
ST AUGUSTINE, FL 32095 US

FEI Number: 86-2332007

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

LUDWIG HULSEY, P.A.
5150 BELFORT ROAD, BLDG. 500
JACKSONVILLE, FL 32256 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE:

Electronic Signature of Registered Agent

Date

Authorized Person(s) Detail :

Title AUTHORIZED MEMBER
Name ARGAND GROUP, LLC
Address 1954 AIRPORT ROAD
STE 124
City-State-Zip: CHAMBLEE GA 30341

Title MANAGER
Name LIOTTA, MATTHEW
Address 4738 CASA COLA WAY
City-State-Zip: ST AUGUSTINE FL 32095

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 605, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: BRANDY CUMMINGS

ACCOUNTING MANAGER 02/08/2024

Electronic Signature of Signing Authorized Person(s) Detail

Date

2025 FLORIDA LIMITED LIABILITY COMPANY ANNUAL REPORT

DOCUMENT# L21000083892

Entity Name: MODERN AERO, LLC

Current Principal Place of Business:

385 HAWKEYE VIEW LANE
ST AUGUSTINE, FL 32095

Current Mailing Address:

385 HAWKEYE VIEW LANE
ST AUGUSTINE, FL 32095 US

FEI Number: 86-2332007

Certificate of Status Desired: No

Name and Address of Current Registered Agent:

LUDWIG HULSEY, P.A.
5150 BELFORT ROAD, BLDG. 500
JACKSONVILLE, FL 32256 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: _____

Electronic Signature of Registered Agent

Date

Authorized Person(s) Detail :

Title AUTHORIZED MEMBER
Name ARGAND GROUP, LLC
Address 1954 AIRPORT ROAD
 STE 124
City-State-Zip: CHAMBLEE GA 30341

Title MANAGER
Name LIOTTA, MATTHEW
Address 385 HAWKEYE VIEW LANE
City-State-Zip: ST AUGUSTINE FL 32095

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am a managing member or manager of the limited liability company or the receiver or trustee empowered to execute this report as required by Chapter 605, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: MATTHEW LIOTA

MANAGER

02/25/2025

Electronic Signature of Signing Authorized Person(s) Detail

Date