



Florida Commission on Ethics
P.O. Drawer 15709, Tallahassee, Florida 32317-5709
"A Public Office is a Public Trust"

FLORIDA
COMMISSION ON ETHICS

SEP 22 2025

COMPLAINT
25-261

RECEIVED
ORIGINAL

1. PERSON BRINGING COMPLAINT:

Name: Scott Belford Telephone: 352-235-2041
Address: 4756 SE 6th Lane
City: Keystone Heights County: Bradford State: FL ZIP: 32656

2. PERSON AGAINST WHOM COMPLAINT IS BROUGHT:

Use a separate complaint form for each person against whom you are filing a complaint.

Name: Randell Andrews - Zoning Director Telephone: 904-966-6231
Address: 945 N. Temple Ave., P.O. Drawer B
City: Starke County: Bradford State: FL ZIP: 32091
Title of office or position held or sought: Zoning Director

3. STATEMENT OF FACTS:

Please provide a full explanation of your complaint, describing the facts and the actions of the person named above and why you believe he or she violated the law, and include a statement of how you became aware of these facts. Include relevant dates and the names and addresses of people whom you believe may be witnesses. Please do not submit more than 15 pages, including this form. Please do not submit video or audio tapes, CD, DVDs, flash drives, or other electronic media; such material will not be considered part of the complaint and will be returned.

4. OATH:

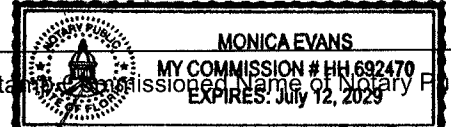
I, the person bringing this complaint, do swear or affirm that the facts set forth in the foregoing complaint and attachments thereto are true and correct to the best of my knowledge and belief.

STATE OF Florida
COUNTY OF Putnam

Sworn to (or affirmed) and subscribed before me by
means of ☒ physical presence or ☐ online notarization,
this 8th day of September, 2025,
by Scott Belford
(name of person making statement)

Scott Belford
SIGNATURE OF COMPLAINANT

Monica Evans
(Signature of Notary Public)

(Print, Type, or Stamp the Commissioned Name of Notary Public)

MONICA EVANS
MY COMMISSION # HH 692470
EXPIRES: July 12, 2029

Personally Known ☒ OR Produced Identification
Type of Identification Produced: _____

Statement of Facts

Respondent: Randal “Randy” Andrews, Zoning Director / Land Development Regulations (LDR) Administrator, Bradford County, Florida

Complainants: Mary & Scott Belford, adjacent property owners

Matter: Z 25-02 (Alexander) and related rezoning/subdivision actions

Timeframe: 2017–2025 (with Commission actions culminating July 1 and August 21, 2025)

Overview of Respondent and Duties

1. Randal (“Randy”) Andrews serves as Bradford County’s Land Development Regulations (LDR) Administrator and Zoning Director, responsible for administering and enforcing the LDRs; supervising zoning compliance; and ensuring that site-specific rezonings proceed as quasi-judicial matters supported by competent, substantial evidence and discernible findings for Comprehensive Plan consistency. As detailed below, Andrews, through acts and omissions, (a) declined to enforce RSF-1 restrictions and related code provisions on the Alexander tract, (b) failed to place or maintain the matter in a proper quasi-judicial posture despite neighbor complaints and evidence, and (c) advanced a rezoning that ratified prior irregularities without the required findings.

Unauthorized Zoning Actions

2. Respondent Randal (Randy) Andrews is the Zoning Director for Bradford County, Florida and is subject to Part III, Chapter 112, Florida Statutes.

3. On November 6, 2024, Respondent wrote in an email that he “took it upon myself to grant the zoning change” for the Alexander property, without any public hearing or posted signs.

4. On February 7, 2025, in response to a public-records request regarding that change, the County produced a written response stating “No such ordinance exist” and that the parcels were “changed by the LDR Administrator.”

Prior Discipline

5. On November 18, 2024, the County issued a Corrective Action Plan disciplining Respondent for “rezoning procedures not followed” and “lack of documentation” in a separate matter, demonstrating Respondent’s knowledge of the proper legal process and the consequences of bypassing it. For clarity, Complainants do not allege any outcome of any state-level ethics proceeding. The reference to the Corrective Action Plan is solely to a public Bradford County HR document.

Permitting and Occupancy Irregularities

6. Certificates of Occupancy (COs) were issued on October 3, 2024 for multiple parcels in the Alexander tract. One parcel had no CO as of December 5, 2024 (tie-down failed; power release issued), and another shows only a February 10, 2021 re-roof permit. These actions occurred while the tract was zoned RSF-1.

7. On August 21, 2025, the Board of County Commissioners adopted a rezoning in Case Z 25-02 (RSF-1 → RSF/MH-1), which effectively ratified outcomes previously facilitated by Respondent’s “administrative rezoning” and permitting posture, despite no earlier ordinance.

8. On information and belief, no approved and recorded Final Plat creating the five ½-acre “lots” existed when Respondent permitted or validated multiple dwellings; permits and COs proceeded as if such lots lawfully existed.

Water System Compliance (Zoning–Building–Health coordination)

9. Regulatory roles. Within Bradford County’s Building & Zoning operation, the Zoning Director/LDR Administrator (Mr. Andrews) is responsible for enforcing land-use preconditions under the LDRs (use, density, setbacks), while the Building Official (Mr. Crawford) issues building permits, inspections, and certificates of occupancy under the Florida Building Code. Potable-water systems serving more than a single dwelling are regulated by the Florida Department of Health (DOH); where a single well serves multiple dwellings, DOH review/authorization is required (commonly as a Limited Use Public Water System under Ch. 64E-8, F.A.C.), together with any county plumbing/water-service permits for distribution lines.

10. Facts observed from the County’s file to date. On information and belief, a single private well installed in 2022 has been used to supply multiple mobile homes on the

Alexander tract. Records produced to Complainants show no additional well permits and no DOH approval or operations authorization for multi-connection use in the period when units were occupied. Likewise, Complainants have not been provided county plumbing/water-service permits evidencing lawful distribution to multiple dwellings. Despite the absence of clear approvals, occupancy proceeded—including certificates of occupancy issued October 3, 2024, and a power release noted even while a CO was outstanding.

11. Ethics significance. Given their complementary roles, Mr. Andrews (zoning compliance/LDR preconditions) and Mr. Crawford (permit/CO issuance) were jointly positioned to withhold approvals or occupancy until potable-water compliance was demonstrated through DOH and any required county permits. Allowing occupancy and/or permitting activity to proceed without verifying multi-use well authorization afforded Mr. Alexander a special regulatory advantage and departed from ordinary safeguards intended to protect public health and neighboring properties.

12. Requested verification. Complainants respectfully request that the Commission obtain from DOH and the County: (a) any Limited Use Public Water System permits/approvals, sampling/operation records, or variances for the Alexander tract; (b) any county plumbing/water-service permits or inspections for distribution lines serving multiple homes from a single well; and (c) Building & Zoning checklists or sign-offs used by Mr. Andrews and Mr. Crawford to verify potable-water compliance before issuing power releases or COs.

Notice and Knowledge of Violations

13. Prior notice of violations. Before the filing of formal code complaints in September 2025, Respondent Andrews had actual knowledge of multiple violations. On or about July 2024, Complainant Mary Belford personally advised Respondent that Alexander's property was in violation of the LDR, including unpermitted mobile home placements and occupancy without certificates of occupancy. Other residents had also raised concerns directly to Respondent prior to this date. Despite this notice, Respondent took no corrective enforcement action, permitting continued occupancy and development inconsistent with the LDR.

14. On July 15, 2024, Ms. Belford visited the Zoning office and requested to see the rezoning file (application, approval date, notices, sign-posting affidavit). She was not shown the file. Mr. Andrews said he would call back on July 17, 2024. On July 18, 2024, Ms. Belford called

and left a message; no call was returned. She made two additional office visits thereafter; no file was produced.

Misdirection and Records Failures

15. During these July visits, Mr. Andrews redirected Ms. Belford to the tax office. Tax staff stated they were “baffled” about the zoning status but had entered five new parcels into the tax roll for the site. On information and belief, this entry occurred without an approved or recorded Final Plat or a duly adopted rezoning ordinance and appears to have been based on owner representations, not any produced county approval.

16. Because the rezoning file was not produced in July 2024—and later communications said there were “no further records available”—Ms. Belford could not determine whether the developer submitted or the County required buffering or landscaping plans or a privacy-fence condition before allowing occupancy.

Special Regulatory Advantage

17. Collectively, the off-book “administrative rezoning,” the permitting and CO sequencing while the site was zoned RSF-1, and additional post-discipline actions (such as a power release despite no CO) conferred special regulatory advantages on a private party (Tommy Lee Alexander) through Respondent’s public position, contrary to law.

Misrepresentation to Citizens

18. False and misleading statements to adjacent owners. In or about July 2024, Complainant Mary Belford raised zoning and compliance concerns with Respondent. Rather than provide records or explain the absence of an ordinance, Respondent gave false or misleading information about the status of the Alexander property. On information and belief, at least one other resident also received misleading statements from Respondent regarding the zoning or subdivision status of the tract.

19. Contemporaneous written corroboration. On November 8, 2024, Complainant Mary Belford memorialized Respondent’s statements in an email. She recorded that Respondent told her he could “just change” the zoning due to an error, that there would be a large buffer, and that Alexander would be directed to install a privacy fence — none of which were supported by any record.

20. Statements regarding a privacy fence. In July–August 2024, after Complainant Mary Belford explained that the rezoning/subdivision would force her to spend about \$20,000 on a privacy fence, Respondent said that would not be necessary because he would “just tell Alexander to put one in.” On information and belief, he gave the same assurance to at least one other nearby resident. The public record contains no condition requiring Mr. Alexander to install a privacy fence.

21. Contemporaneous record to Commissioner. On July 24, 2024, Complainant Mary Belford emailed Commissioner Danny Riddick after multiple unanswered calls to Respondent Andrews. In the email and a contemporaneous memorandum for record, she documented that Respondent stated the property had been rezoned and subdivided into five half-acre lots, but could not provide the approval date, notices, or Commission action. She recorded that Respondent admitted “we didn’t do anything normally done” and claimed the Planning Council told him he could “just change it.” She further documented Respondent’s assurance that he would “just tell Alexander to put up a fence.”

22. Lack of response from Commissioner. Commissioner Riddick never responded to the July 24, 2024 email. This failure to respond, combined with Respondent’s misrepresentations, left Complainants without recourse to verify the rezoning or subdivision status of the Alexander property, compounding the harm described in ¶¶18–21.

Personal Real Estate Transactions Using Office

23. On August 14, 2019, Respondent used his official county email account to discuss and arrange activity around his personal land sale, including parcel numbers and a proposal to “ride out there” with a realtor. In the same exchange, he solicited brokerage help to sell about 18 acres on Butler Road that he owned.

24. On January 25–26, 2021, Respondent emailed a realtor regarding a client’s family compound split, attaching a flood map and giving permitting advice. In the same message, he added: “Good news about my parcel, just keep me in touch.”

25. On June 22, 2022, Respondent emailed a prospective buyer attaching maps and zoning details for two parcels he owned, explicitly listing standards and marketing the property for \$190,000. He signed as “Randy Andrews, Zoning Director, Bradford County, Fla., (904)-966-6213.”

26. On October 26–27, 2022, Respondent proactively contacted a prospective buyer regarding 18 acres he was selling, attaching flood maps and discussing zoning, flood

elevation requirements, livestock permissibility, and his ownership of adjacent lands. He signed using his official title and contact block.

27. On September 21–22, 2017, Respondent corresponded with a realtor regarding commission rates for his land, negotiating her rate from 10% to 8%.

Pattern and Prior Complaints

28. In 2024, resident Damian Fragata prepared and submitted a Formal Complaint to the Florida Commission on Ethics naming Randy Andrews (along with the County Manager and Assistant Manager), alleging misuse of public position and related procedural defects in a subdivision matter; he also filed a police report alleging official misconduct and related offenses. Complainants do not ask the Commission to credit Mr. Fragata's allegations as proven; rather, these filings are presented to show the existence of similar, contemporaneous complaints and to request that the Commission obtain the underlying County records to determine whether Mr. Andrews has engaged in a broader pattern of irregular "administrative" actions (e.g., zoning/map changes without ordinance or findings, occupancy before CO, or approvals without proper notice).

Supplemental Neighbor Evidence (2021–2022)

29. Neighbor documentation, parcel orientation, and acreage. At the time of the 2021–2022 events, Ms. Parker owned 6.02 acres immediately south of the Alexander tract, consisting of two contiguous parcels arranged north-to-south. The northern parcel (approximately 2.5 acres) directly adjoined Alexander's and later held Parker's mobile home; the southern parcel was 3.52 acres and contained Parker's house. During this period, citizen Michelle A. Reynolds assisted Parker with zoning research and documentation, including the November 10 and November 16, 2021 emails and the March 18, 2022 videos showing Alexander moving mobile homes with heavy equipment, property-line clearing on Parker's side, and junk placed on Parker's property; Parker later issued a trespass warning.

30. Subsequent chain and impacts (Parker → Cortes). Ms. Parker ultimately lost the 3.52-acre house parcel to foreclosure, and April Cortes purchased that parcel and now resides there. Ms. Parker later sold the ~2.5-acre mobile-home parcel because of Alexander's repeated trespasses and conditions on his property. The current north-to-south sequence is therefore: Alexander parcel → former Parker ~2.5-acre mobile-home lot (since sold) → Cortes 3.52-acre house lot. Ms. Cortes has appeared before the Zoning/Planning Board with complaints regarding Mr. Alexander's activities.

Substantive LDR Threshold and Physical Constraints

31. The Alexander tract at issue comprises approximately 2.5 acres and is burdened by a 30-foot private road running through it, materially constraining any lawful configuration of dwellings. On information and belief, LDR §4.9.6(1) requires a minimum of ten (10) contiguous acres to establish an RSF/MH district, a standard not met by the subject tract; nevertheless, the matter was advanced without staff-level correction or written findings addressing that threshold requirement.

Requested Action

Complainants request that the Florida Commission on Ethics find legal sufficiency, investigate, and find probable cause that Respondent violated:

- Section 112.313(6), Florida Statutes (misuse of public position), by conferring special regulatory advantages on a private party (Alexander), misleading citizens, and using his public office and resources in a manner inconsistent with the public trust; and, in the alternative,
- Section 112.313(7)(a), Florida Statutes (conflicting employment/contractual relationship), by engaging in personal real estate marketing while holding himself out as Zoning Director of Bradford County.

Witness / Contact Information

- Joyce Parker — Former owner immediately south of Parcel 1031; firsthand observations (2021–2022); later sold and relocated.

Email: parkerjv@msn.com

Phone/Address: not provided

- Michelle A. Reynolds — Assisted Parker (zoning research, evidence compilation, county communications); author of 11/10/2021 and 11/16/2021 emails; recorded 3/18/2022 video; granted permission to use materials.

Email: bad_grr1849@outlook.com

Phone: 850-353-1019

Address: not provided

- April Cortes — Purchased part of Parker's former holdings; owns the next lot south of Parker's remaining lot (south of Parcel 1031); appeared before the Zoning/Planning Board with complaints regarding Alexander's activities.

Phone: 386-916-7408

Email/Address: not provided

- Damian Fragata — Resident/complainant providing similar-acts lead material (COE complaint; police report).

Address: 19027 NW 69th Lane, Starke, FL 32091

Phone: 954-278-4848

Email: Damian.Fragata@gmail.com

Exhibits

Exhibit A: Bradford County Code Research email & comments (Nov. 10, 2021) — maps; RSF-1; FLU; LDR excerpts; commentary.

Exhibit B: Illegal Burning Statutes Email (Nov. 16, 2021) — relevant statutes regarding open burning.

Exhibit C: Videos of March 18, 2022 — on file with Complainants (link available upon request).

Exhibit D: Email from Attorney Byron Flagg (Aug. 1, 2025) — necessity of code-enforcement/injunctive relief noted.

Exhibit E: Board action on Z 25-02 (Aug. 21, 2025) — agenda/minutes/transcript when obtained.

Exhibit F: Fragata — Formal Complaint to Florida Commission on Ethics (2024).

Exhibit G: Fragata — Police Report (Aug. 1, 2024).