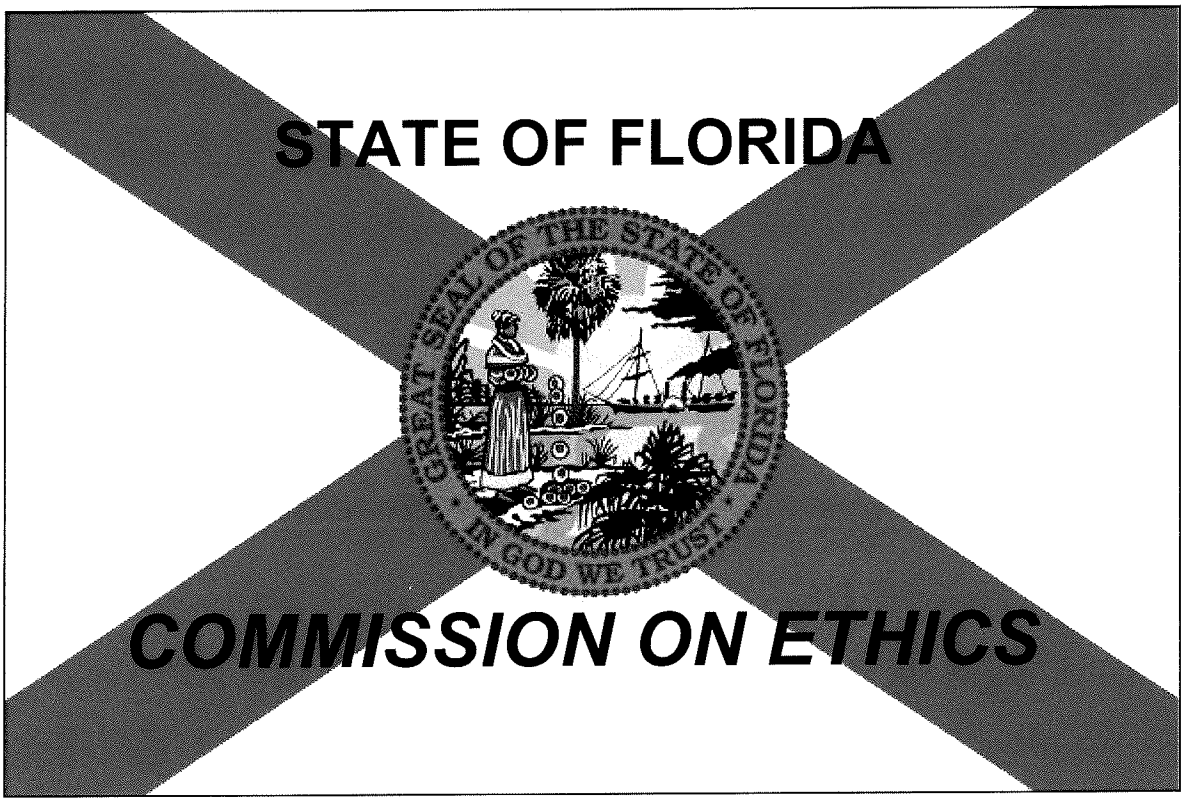
REPORT OF INVESTIGATION



Complaint Number 23-108

NOTICE CONCERNING CONFIDENTIALITY

This report of investigation concerns an alleged violation of Chapter 112, Part III, Florida Statutes, or other breach of public trust under provisions of Article II, Section 8, Florida Constitution. The Report and any exhibits may be confidential (exempt from the public records law) pursuant to Section 112.324, Florida Statutes, and Chapter 34-5, F.A.C., the rules of the Commission on Ethics. Unless the Respondent has waived the confidentiality in writing, this report will remain confidential until one of the following occurs: (1) the complaint is dismissed by the Commission; (2) the Commission finds sufficient evidence to order a public hearing; or (3) the Commission orders a public report as a final disposition of the matter. *See Section 112.3215, Florida Statutes, regarding executive branch lobbying matters and confidentiality.

STATE OF FLORIDA
COMMISSION ON ETHICS
Post Office Drawer 15709
Tallahassee, Florida 32317-5709

REPORT OF INVESTIGATION

TITLE: LESLIE C. RICCIARDELLI
Collier County Public Schools
Superintendent
Naples, Florida

COMPLAINT NO: 23-108
Exhibit A

INVESTIGATED BY: Ronald D. Moalli

Distribution: Commission on Ethics
Respondent
Advocate
File

Releasing Authority: Kerrie J. Stillman
Executive Director
July 13, 2023
Date

* * * *

REPORT OF INVESTIGATION
COMPLAINT NO. 23-108

(1) The complaint in this matter was filed by Nancy Keller who alleges that Leslie C. Ricciardelli, while serving as the Superintendent of the Collier County Public Schools, violated the Code of Ethics for Public Officers and Employees.

(2) Ms. Keller alleges that Ms. Ricciardelli failed to properly disclose all of her financial interests on her 2021 CE Form 1, "Statement of Financial Interests," when she completed the form on June 29, 2022. Specifically, Ms. Keller alleges that Ms. Ricciardelli failed to select the manner in which she calculated her reportable interests; failed to report her leased vehicle in Part D, "Intangible Personal Property;" failed to report her vehicle lease in Part E, "Liabilities;" and failed to report a liability of $18,665.01 in unpaid fines in Part E, "Liabilities."

(3) The Executive Director of the Commission on Ethics noted that based upon the information provided in the complaint, the allegations were sufficient to warrant a preliminary investigation to determine whether the Respondent's actions violated Section 112.3145, Florida Statutes (Disclosure of Financial Interests).

(4) Ms. Ricciardelli reported by telephone that she read the instructions that are included with the 2021 CE Form 1 form, and completed the form on her own without the assistance or advice of another party. A copy of the Respondent's 2021 CE Form 1 was provided by the Complainant and included as pages five and six of the complaint.

(5) Addressing her failure to indicate the manner in which she calculated her reportable interests, Ms. Ricciardelli said she completed and filed the form on the last day of the reporting period, and, because she hurriedly filled out the form, she simply overlooked this section. Ms. Ricciardelli noted that she calculated her reportable interests using the "Dollar Value Threshold," as she has done in the past when she filed CE Form 1s in 2011, 2012, 2013, and 2014, copies of which were provided by the Complainant and included as pages 14 through 21 of the complaint. Ms. Ricciardelli noted that she did not file the form for the years 2015 through 2020 because she was not in a position with the school district that required the disclosure of her financial interests.

(6) Regarding the allegation that the Respondent failed to report in Part D – "Intangible Personal Property," a Mercedes Benz leased vehicle, the CE Form 1, Part D, instructions state, "Describe any intangible personal property that, at any time during the disclosure period, was worth more than $10,000 and state the business entity to which the property related. . . . The value of a leased vehicle is the vehicle's present value minus the lease residual (a number found on the lease document)."

(7) The Respondent reported that she leases a 2021 Mercedes GLC 300 and that she did not realize she was required to report the leased vehicle as intangible personal property. As a result of the complaint, she said she researched her lease agreement and discovered that, because the leased vehicle's value was more than $10,000 during 2021, it should have been

disclosed on her 2021 CE Form 1. The Respondent completed the 2021 CE Form 1X, "Amendment to Statement of Financial Interests," which is appended as Exhibit A, and disclosed "vehicle lease" as intangible personal property.

(8) Regarding the allegation that the Respondent failed to disclose the liability of her vehicle lease, and an unpaid fine of $18,665.01 from the Collier County Code Enforcement Board in the 2021 CE Form 1, Part E – "Liabilities" section of the form, the Part E instructions state, "List the name and address of each creditor to whom you owed more than $10,000 at any time during the disclosure period. The amount of the liability of a vehicle lease is the sum of any past due payments and all unpaid prospective lease payments. You are not required to list the amount of any debt."

(9) The Respondent said she made a mistake by not reporting the 2021 Mercedes GLC 300 lease liability, adding that, when she completed her 2021 CE Form 1, she was unaware of the outstanding fine from the Collier County Code Enforcement Board. As a result of the complaint, she said she discovered that the fine was the result of her husband not obtaining a permit for new construction on their residential property. She noted that she and her husband had recently refinanced their home and that no liens on the property were discovered. Ms. Ricciardelli opined that, if an outstanding fine from the County existed, a lien would possibly have been filed, which would have alerted her to the fine. She said the lack of a lien on their property contributed to her being unaware of the fine. Ms. Ricciardelli included the vehicle lease and the fine as liabilities on her 2021 CE Form 1X as reflected in Exhibit A.

(10) Collier County Code Enforcement records reflect that the fine is actually $52,265.01, and was accrued between the dates, of October 27, 2015 and March 31, 2017.

END OF REPORT OF PRELIMINARY INVESTIGATION

EXHIBIT A

EXHIBIT A

PROCESSED 238923

FLORIDA COMMISSION ON ETHICS

JUN 28 2023

RECEIVED

FORM 1X AMENDMENT TO STATEMENT OF FINANCIAL INTERESTS

LAST NAME - FIRST NAME - MIDDLE NAME
(Same as on original Form 1):

Ricciardelli Leslie Cipolla

MAILING ADDRESS:

264 Burning Tree Drive

CITY: Naples ZIP: 34105 COUNTY: Collier

◆ THIS FORM AMENDS THE (Choose one)

☑ FORM 1 I FILED FOR THE YEAR: 2021
(Use a separate Form 1X for each Form 1 you are amending.)

☐ FORM 1F I FILED FOR THE PERIOD
January 1, _____ THROUGH _____
(Must be between January 1 of the last year in which you held public office or employment and the last date you held that office or employment.)

◆ DURING THAT YEAR, I HELD, OR WAS A CANDIDATE FOR, THE POSITION OF: School Leadership and Performance Officer

◆ WITH THIS GOVERNMENTAL AGENCY: Collier County Public Schools

MANNER OF CALCULATING REPORTABLE INTERESTS:

FILERS HAVE THE OPTION OF USING REPORTING THRESHOLDS THAT ARE ABSOLUTE DOLLAR VALUES, WHICH REQUIRES FEWER CALCULATIONS, OR USING COMPARATIVE THRESHOLDS, WHICH ARE USUALLY BASED ON PERCENTAGE VALUES (see instructions for further details). CHECK THE ONE YOU ARE USING **(must check one):**

☐ COMPARATIVE (PERCENTAGE) THRESHOLDS OR ☑ DOLLAR VALUE THRESHOLDS

PART A -- PRIMARY SOURCES OF INCOME [Major sources of income to the reporting person - See instructions]
(If you have nothing to report, write "none" or "n/a")

NAME OF SOURCE OF INCOME	SOURCE'S ADDRESS	DESCRIPTION OF THE SOURCE'S PRINCIPAL BUSINESS ACTIVITY
Collier County Public Schools	5775 Osceola Trail, Naples, FL 34109	Education
	5775 Osceola Trail, Naples, 34109	

PART B -- SECONDARY SOURCES OF INCOME
[Major customers, clients, and other sources of income to businesses owned by the reporting person - See instructions]
(If you have nothing to report, write "none" or "n/a")

NAME OF BUSINESS ENTITY	NAME OF MAJOR SOURCES OF BUSINESS'S INCOME	ADDRESS OF SOURCE	PRINCIPAL BUSINESS ACTIVITY OF SOURCE
N/A			

PART C -- REAL PROPERTY [Land, buildings owned by the reporting person - See instructions]
(If you have nothing to report, write "none" or "n/a")

PART D — INTANGIBLE PERSONAL PROPERTY [Stocks, bonds, certificates of deposit, etc. - See instructions]
(If you have nothing to report, write "none" or "n/a")

TYPE OF INTANGIBLE	BUSINESS ENTITY TO WHICH THE PROPERTY RELATES
Vehicle Lease	Personal

A1

PART E — LIABILITIES [Major debts - See instructions]
(If you have nothing to report, write "none" or "n/a")

NAME OF CREDITOR	ADDRESS OF CREDITOR
Mercedes Benz Financial Services	P.O. Box 685, Roanoke, TX 76262
Collier County Growth Management	2800 Horseshoe Drive, Naples, FL 34104

PART F — INTERESTS IN SPECIFIED BUSINESSES [Ownership or positions in certain types of businesses - See instructions]
(If you have nothing to report, write "none" or "n/a"

	BUSINESS ENTITY # 1	BUSINESS ENTITY # 2
NAME OF BUSINESS ENTITY	N/A	
ADDRESS OF BUSINESS ENTITY		
PRINCIPAL BUSINESS ACTIVITY		
POSITION HELD WITH ENTITY		
I OWN MORE THAN A 5% INTEREST IN THE BUSINESS		
NATURE OF MY OWNERSHIP INTEREST		

PART G — TRAINING For **elected municipal officers officers, appointed school superintendents, and commissioners of a community redevelopment agency** created under Part III, Chapter 163 required to complete annual ethics training pursuant to section 112.3142, F.S.

☐ **I CERTIFY THAT I HAVE COMPLETED THE REQUIRED TRAINING.**

PART H — EXPLANATION OF CHANGES

I have also added information pertaining to my personal vehicle as it is a lease with a value higher than $10,000.

IF ANY OF PARTS A THROUGH H ARE CONTINUED ON A SEPARATE SHEET, PLEASE CHECK HERE ☐

SIGNATURE OF FILER:

Signature:

Leslie C. Ricciardelli

Date Signed:

6/20/23

CPA or ATTORNEY SIGNATURE ONLY

If a certified public accountant licensed under Chapter 473, or attorney in good standing with the Florida Bar prepared this form for you, he or she must complete the following statement:

I,_____, prepared the CE Form 1 in accordance with Section 112.3145, Florida Statutes, and the instructions to the form. Upon my reasonable knowledge and belief, the disclosure herein is true and correct.

CPA/Attorney Signature _____

Date Signed _____

FILING INSTRUCTIONS:

Return the form to the location where you filed the Form 1 or 1F that you are seeking to amend.

Local officers file with the Supervisor of Elections of the county in which they permanently reside. (If you do not permanently reside in Florida, file with the Supervisor of the county where your agency has its headquarters.) Form 1 filers who file with the Supervisor of Elections may file by mail or email. Contact your Supervisor of Elections for the mailing address or email address to use. Do not email your form to the Commission on Ethics, it will be returned.

State officers or specified state employees' who file with the Commission on Ethics may file by mail or email. To file by mail, send the completed form to P.O. Drawer 15709, Tallahassee, FL 32317-5709; physical address: 325 John Knox Rd, Bldg E, Ste 200, Tallahassee, FL 32303. To file with the Commission by email, scan your completed form and any attachments as a pdf (do not use any other format), send it to CEForm1@leg.state.fl.us and retain a copy for your records. Do not file by both mail and email. Choose only one filing method.

Candidates should have filed their Form 1 together with their qualifying papers.

QUESTIONS:

About this form or the ethics laws may be addressed to the Commission on Ethics, Post Office Drawer 15709, Tallahassee, Florida 32317-5709; physical address: 325 John Knox Road, Bldg E, Ste 200, Tallahassee, FL 32303; telephone (850) 488-7864.