

CITY OF BELLE ISLE, FLORIDA CITY COUNCIL AGENDA ITEM COVER SHEET

Meeting Date: January 15, 2019

To: Honorable Mayor and City Council Members

From: B. Francis, City Manager

Subject: Reimbursement of Attorney Fees for Commissioner Nielsen

Background: At the November 13, 2018 meeting, the City Council approved the reimbursement of attorney fees for Commissioners Readey and Gold. Commissioner Nielsen's request was tabled until a more detailed itemization of Commissioner Nielsen's request was received from her attorney. Commissioner Nielsen wanted to discuss this request with the Council. Commissioner Nielsen's attorney, Jacob Stuart, Esq. is scheduled to attend the Council meeting to provide further explanation and clarification.

Staff Recommendation: The staff recommendation is to consider the request of Commissioner Nielsen and determine it meets the criteria of reasonable fees and determine if any, or all, of the fees should be reimbursed.

Suggested Motion: If the Council determines that Commissioner Nielsen is to be reimbursed for any, or all, of her attorney fees, then the suggested motion would be as follows: <u>I move that we reimburse Commissioners Nielsen for attorney fees in the amount of (\$).</u>

Alternatives: Do not approve the request.

Fiscal Impact: \$20,000 (50% recoverable through the City's insurance)

Attachments:

Original Bill

Letter of Explanation for fees from Jacob V. Stuart, Jr. (Commissioner

Nielsen's Attorney)

REQUEST FOR REIMBURSEMENT OF LEGAL EXPENSE INCURRED DUE TO THE BELLE ISLE SUNSHINE INVESTIGATION 12/01/2015-02/07/2018

From: Sue (Susanne) Nielsen, Commissioner, District 7,

5006 St. Germain Ave., Belle Isle, FL 32812

Description of nature and results of proceedings (See attached Case Cover Sheet)

Each Count, Charge, Allegation (See attached)

Date of alleged violation 08/02/2015

Case Number: 48-2017-NM-003789

Position: Commissioner, District 7

Reason Imbursement Justified: Allegations involved actions taken while fulfilling my duty to represent the citizens; charges were dismissed due to Insufficient Proof (See Attached)

Attorney Representing Me (Recommended by city attorney Frank Kruppenbacher on 09/28/2016)

Jacob V. Stuart, P.A., 1521 Mount Vernon Street, Orlando, FL 32803, Phone: 407-434-0330

Fee Arrangement: Retainer paid in Advance

Invoice and Payment: See attached

Other:

Trial Attorney and Counselor at Lane

INVOICE

DATE: JULY 17, 2018 INVOICE # 1

Jacob V. Smart, P.A. 1521 Mount Vernon Street. Orlando, FL 32803 (p) 407-434-0330 (c) 407-416-5987

TO The Honorable Sue Nielsen

RATEAMOUNT

HOURS	DESCRIPTION	RATE AMOUNT	
FLAT-FEE	Initial Fee (PIF September 29, 2016)	KATEAMOUNT	TOTAL.
	•	\$4,000.00	\$4,000.00
FLAT-FEE	Secondary Retainer (PIF August 17, 2017)	\$11,000,00	\$11,000,00
FLAT-FEE	Motion to Dismiss and Trial Preparation (PIF October 19,		311,000.00
	2017)	\$5,000	\$5,000,00

\$U.U.S.TAX \$20,000,00 \$U.U.S.TAX \$0.0 FOLU. \$20,000,00

Please Make all checks payable to Jacob V. Stuart, $P_{\rm e} \Lambda_{\rm e}$

Thank you for your trust in our Firm.

CASE COVER SHEET

SAO REC'D: 12/01/2015

DEFENDANT: SUSANNE NIELSEN

AGENCY: STAO, 2015-IN-0080

OFFICER: Emmett Browning

ZONE:

CASE NO: 48-2017-NM-003789

VICTIM:

CHARGE(s): REC'D: VIOLATION OF PUBLIC MEETINGS LAW

FILED:

OFFENSE DATE: 08/02/2015

APPR'D FOR FILING

ARREST DATE:

DECLINED TO FILE: 02/07/2018

REASON CASE NOT FILED:

Code 36 - Evidence submitted by law enforcement agency cannot be proved beyond a reasonable

NOTES:

08-02-15: Email exchange between D & Sarah Goodwin regarding funding to repair erosion in LCA HOA (agenda item). Email from Goodwin requests D write a letter/note which is to be copied to Comm. Readey, Gold & Pisano. D was blind-copied along with Readey & Gold on an email from Goodwin to Pisano regarding the erosion repairs. D responded, acknowledging reading the email, on 08-03-15.

10-06-15: D sent 2 texts to Comm. Ed Gold regarding the "Delia Beach" project (agenda item).

10-17-15: D responded to a text from Comm. Harvey Readey regarding the purchase of a street sweeper (agenda item).

11-28-15: D responded to an email from city resident Stuart Bernstein regarding suspending the City Manager (agenda item). Email had statements admitting discussions with Mayor Lydia Pisano regarding the City Manager's suspension or pay cut.

COMMENTS

On December 1, 2015, a complaint was lodged with this office regarding potential criminal violations of Florida Statute §286.011 (commonly referred to as the Sunshine Law) committed by members of the Belle Isle City Commission. Chief Edwards assigned then-SAO investigator Jeff Harris to conduct an investigation. SAO Investigator Emmett Browning was later assigned to assist Inv. Harris, however, Harris was still lead investigator and maintained primary responsibility to conduct and document the investigation. The lead officer left the employ of this office in January 2017 and has since been uncooperative and unresponsive to requests for assistance about his assignments as a state attorney employee. The Belle Isle case was initially classified as State Attorney Investigation Number 2015-IN-0080. It was later reclassified as internal Case Number 2017-NM-3789.

To prove a criminal misdemeanor violation of the Sunshine Law, the state must prove beyond a reasonable doubt that members of the Belle Isle City Commission knowingly attended a meeting at which official acts were to be taken without complying with the requirements of 1) reasonable meeting notice and 2) promptly recorded meeting minutes open to public inspection. See, Florida Statute §286.011. The statute also allows for a noncriminal infraction (fine not to exceed \$500) for unknowing sunshine law violations.

The basis for a criminal prosecution thus becomes proof of communication between two or more city commissioners about official city business outside of a noticed meeting or gathering. The offending

communication need not be in a formal meeting setting. The case law allows prosecution for informal communication such as conversations, emails, text messages, correspondence and so forth. State Attorney Investigators set out to determine if such unlawful communication occurred and, to that end, subpoenaed an extensive number of documents from various sources. The full details are contained in the investigative reports.

As the investigation proceeded to the interview stage, the investigators were confronted with reluctant witnesses. State Attorney Jeffrey Ashton made the strategic decision to grant use-immunity to certain witnesses by compelling their testimony through the issuance of state attorney investigative subpoenas. Among these immunized witnesses was the mayor of Belle Isle, Lydia Pisano, who was herself a member of the city commission. The details of her sworn recorded testimony are contained in other documentation generated by the investigation. In summary, Mayor Pisano admitted to violating the sunshine law in general and implicated other members of the commission in her testimony, however, she did not provide specifics Also immunized under the same process was City Commissioner Ed Gold. The use-immunity makes it extraordinarily difficult (but not legally impossible) to prosecute Pisano or Gold for the same subject matter as their sworn testimony.

While Mayor Pisano's testimony in particular revealed unlawful communication among certain city commissioners, the investigators sought physical evidence or other testimony to support those claims. After reviewing Inv. Harris' work product I identified potential sunshine law violations. These are fully set out in the thirty page Timeline Supplemental Report signed December 9, 2016. However, the state has no corroborating physical or other evidence and it is my opinion that significant proof deficiencies preclude filing charges.

For example, Inv. Harris asserts that certain email communications which could form the basis for prosecution were blind copies (bcc) between city commissioners in contravention of the sunshine law. However, Inv. Browning and I reviewed the documents in our possession and we cannot locate proof/authentication that the copies were indeed bcc's sent from one commissioner to another. Although the copies in our possession are most likely blind copies, we lack proof beyond a reasonable doubt. We do not have access to computer hard drives for independent forensic analysis.

In an attempt to obtain such corroborating evidence I entered into pre-charge plea discussions with a particular city commissioner's lawyer. The goal was to afford that commissioner a favorable sentence in return for truthful testimony which we expected would corroborate Mayor Pisano's immunized testimony and also authenticate various documents in the state's possession. Those plea negotiations were not successful and the proof deficiencies have not been solved.

A copy of this document was sent to Law Enforcement Agency on February 7, 2018.

PARALEGAL: Noel Piros

APPROVED BY ASA: Richard I. Wallsh

Assistant State Attorney

DATE: February 7, 2018





JACOB V. STUART P.A.

January 7, 2019

Sent Via Electronic Mail

Mr. Bob Francis City Manager, Belle Isle, FL 1600 Nela Ave. Belle Isle, FL 32809 bfrancis@belleislefl.gov

RE: Response from Attorney Jacob Stuart, Jr., Concerning the Representation of Sue
Nielsen

Dear Mr. Francis:

My name is Jacob Stuart, Jr. and I represented the Honorable Sue Nielsen in Case No.: 2017-NM-3789 and 2015-IN-80 here in the Ninth Judicial Circuit. As you have requested, I have put together a *summary* of the legal services my Firm provided to Ms. Nielsen.

Please know that I was originally retained by Ms. Nielsen on September 29, 2016. As you may know, Ms. Nielsen's case began as an open investigation by the 9th Judicial Circuit State's Attorney's Office into alleged violations of Florida's "Sunshine Law" and other potential collateral issues. The case concluded on February 8, 2018 with the State of Florida deciding not to proceed with criminal charges after requesting Ms. Nielsen to plea to baseless criminal charges to resolve the matter. The State's perspective of the alleged facts relating to Ms. Nielsen, and the other officials allegedly involved, can be found in their "Timeline Supplemental Report" from December 16, 2016 on pages 8-19.

The total fee for my firm's representation of Ms. Nielsen throughout the criminal investigation and prosecution for 497 days was \$20,000.00. An invoice for my fees has been previously provided to you.

While I have been taught since I was a boy that humility is one of the most important virtues that exists, it appears a brief summary of my career is necessary. I have been admitted to practice law in the State of Florida since November, 2010. Since that time, I have tried over 130



JACOB V. STUART P.A.

criminal jury trials against the State of Florida. I have also represented many elected officials in criminal and administrative investigations ranging from the Florida Election Commission to inquiries from federal agency(s) including the Department of Homeland Security, the Federal Bureau of Investigation, the Security and Exchange Commission, and the Internal Revenue Service. In addition, I have been on retainer for the past 3 years for a Fortune 50 Company to represent them here locally in criminal and administrative matters in Orange, Osceola, and Seminole Counties. I have also been awarded the designation as a "Rising Star" in the Florida Super Lawyers Publication each year since 2015. Only 2.5% of lawyers receive this recognition out of 100,000+ lawyers in Florida. This selection process includes independent research, peer nominations and peer evaluation. Finally, I was recognized by Florida Trend as a "Florida Legal Elite Up and Comer" in 2017. This statewide designation is given to attorneys under 40 years old who are "respected by their peers for excellence in law [and] represent the future of the legal profession in Florida."

During the course of my representation of Ms. Nielsen from September, 2016 to present, at a minimum, I have had over thirty (30) phone calls with Ms. Nielsen, over fifty (50) text messages, over twenty-five (25) emails, and at least six (6) meetings in my office. In addition, I was provided with thousands of text messages and emails by Ms. Nielson, as well as thousands of pages of documentation to review pertaining to the subject of the investigation. As supported by the attachments to this letter, my office communicated with the Office of the State Attorney over thirty (30) times, including a face-to-face interview with Ms. Nielsen, phone calls, emails, and providing the State Attorney's Office a comprehensive binder of communication by Ms. Nielsen for the period requested. In addition, there were many hours spent researching the application of each specific instance of potential violations and preparing a memorandum of law and motion to dismiss at arraignment if the State did formally file charges.

For the purposes you requested, I want to reiterate that I do not normally charge clients by the "billable hour method" as I believe that flat-fees are better for client's expectations, overall efficiency, and my firm's time management. To help assist in the timeline of work, I have gone back to give a macro examination our work. Simply put, creating a work-log of over a yaer's



JACOB V. STUART P.A.

worth of work, is sunstantial in itself. Towards this end, while the work done was immense as listed in the attachments, this does not reflect the total amount of work done by myself and my Firm. If I had charged Ms. Nielsen a reasonable billable rate of \$350.00 per hour, Ms. Nielsen's bill for legal services would have greatly exceeded what has been paid to my Firm. We have broken down the macro-summaries as follows (none of which are exhaustive): (1) a communication log with myself and Ms. Nielsen; (2) a communication log with my Firm and 9th Judicial Circuit State's Attorney's Office; (3) a portion of the relevant text messages involving Ms. Nielsen; 1 and (4) a copy of the relevant phone records. If required, an exhaustive list can be provided but would require more time and cost(s).

Finally, I plan on attending the next meeting pf the Belle Isle City Hall Meeting to answer any question(s) from the Council or staff. Further, please feel free to call (my cell is 407-416-5987) or email, JVS@JacobStuartLaw.com, with any questions or concerns.

Sincerel

Jacob V. Stuart, Jr.

Enclosures

CC: The Honorable Sue Nielsen

¹ As indicated, and provided to 9th Judicial Circuit State's Attorney's Office, there were were thousands of texts and emails, section 3 of the attachments represent a portion of the discovery. A public records request of our information provided to the 9th Judicial Circuit State's Attorney's Office would also provide a point of reference as well.

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9/25/17	Email: Mr. Rich Wallsh, Esq
9/28/17	Email: Mr. Rich Wallsh, Esq
10/2/17	Email: Mr. Rich Wallsh, Esq
N/A	Telephone Confernce: Mr. Rich Wallsh, Esq
N/A	Telephone Confernce: Mr. Rich Wallsh, Esq
10/4/17	Email: Mr. Rich Wallsh, Esq
11/28/17	Email: Mr. Rich Wallsh, Esq
11/29/17	Email: Mr. Rich Wallsh, Esq
2/7/18	Email: Mr. Rich Wallsh, Esq

DATE	Sue Nielsen	Lydia Pisano
11/15/13	3	3
11/18/13	11	16
11/19/13	3	5
11/22/13	2	1
11/25/13	1	3
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2/23/14	3	8
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	2	Katy McGinnis
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	11	Jeremy Weinsler
10/29/14	3	11
10/30/14	0	1
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4/22/16	1	1
9/7/16	1	0
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	1	Frank Kruppenbachan
6/1/15	1	1
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5/15/16	4	2
5/17/16	1	1
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6/8/16	8	2
6/22/16	4	8
6/23/16	4	1
6/24/16	1	1
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	2	Pattrick Kennedy
1/27/16	2	0
6/8/16		3
	0	Lerry Miles
12/2/14	4	1
12/3/14	1	5
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12/6/14	0	9
9/12/16		1
	1	John Eversten
3/8/16	2	1
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		Rick Willer
5/30/16	0	3
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