

**IN THE CIRCUIT COURT FOR THE SECOND JUDICIAL CIRCUIT,
IN AND FOR LEON COUNTY, FLORIDA**

KEVIN AMBLER, a Republican
candidate for nomination and election
to the Florida Senate, District 12,

Plaintiff,

vs.

CASE NO.: 2010-CA-3014

**ELECTIONS CANVASSING COMMISSION
OF THE STATE OF FLORIDA;**
DAWN K. ROBERTS, in her capacity as the Interim
Secretary of State; **DEPARTMENT OF STATE,
DIVISION OF ELECTIONS;** **EARL LENNARD**,
in his capacity as the Supervisor of Elections of
Hillsborough County, Florida; **BRIAN E. CORLEY**,
in his capacity as the Supervisor of Elections of
Pasco County, Florida; and **JIM NORMAN**,
a Republican candidate for nomination and
election to the Florida Senate, District 12,

Defendants.

FILED
CLERK OF THE CIRCUIT COURT
LEON COUNTY, FLORIDA

2010 MAR 31 PM 2:07

FILED

COPY - not verified against original

COMPLAINT CONTESTING ELECTION

General Allegations

1. This is an action to contest an election pursuant to Section 102.168, Florida Statutes, which provides that the outcome of an election "may be contested in the circuit court by any unsuccessful candidate for such office" based on the "ineligibility of the successful candidate for the nomination or office in dispute." See § 102.168(3)(b), Fla. Stat. and §102.171, Fla. Stat.

2. Florida Senate District 12 is comprised of parts of Hillsborough and Pasco

Counties.

3. Plaintiff Kevin Ambler filed qualifying papers with the Department of State, Division of Elections, as a candidate seeking the Republican nomination and election to the Florida Senate, District 12. He was deemed to have "qualified" as was a candidate for the Republican nomination at the primary election held August 24, 2010.

4. Section 102.111, Florida Statutes, creates the Elections Canvassing Commission and charges it with certifying elections and determining who has been nominated or elected for each federal, state or multicounty office. Section 102.168(4), Florida Statutes, provides that the Elections Canvassing Commission is an indispensable and proper party defendant in contest proceedings for state races.

5. Defendant Dawn Roberts is the interim Secretary of State of the State of Florida and is designated as the State's "chief election officer." See §97.012, Fla. Stat.

6. Defendant, DEPARTMENT OF STATE, is an agency of state government created by Section 20.10, Florida Statutes. The DIVISION OF ELECTIONS is a sub-unit of the Defendant DEPARTMENT OF STATE, established in Section 20.10, Florida Statutes, and charged with the responsibility of administering Florida's election laws, including provisions of law relating to the methods of qualification for nomination or election to state and federal office provided in Section 99.061, Florida Statutes. Pursuant to Section 102.111(3), Florida Statutes, as amended by Chapter 2010-167, Laws of Florida, the Division of Elections provides staff services to the Elections Canvassing Commission. Results of elections that are determined by the Elections Canvassing Commission in federal and state elections are recorded in the files of the Department of

State.

7. Defendant Earl Lennard is the Supervisor of Elections of Hillsborough County, Florida. Earl Lennard, in his capacity as the Supervisor of Elections, is charged with overseeing all federal, state and multi-county elections in Hillsborough County.

8. Defendant Brian E. Corley, is the Supervisor of Elections of Pasco County, Florida. Brian E. Corley, in his capacity as the Supervisor of Elections, is charged with overseeing all federal, state and multi-county elections in Pasco County.

9. Defendant Jim Norman filed qualifying papers with the Department of State, Division of Elections, as a candidate seeking the Republican nomination and election to the Florida Senate, District 12. He was deemed to have "qualified" as a candidate for the Republican nomination at the primary election held August 24, 2010. Section 102.168(4), Florida Statutes, provides that the apparently successful candidate is an indispensable and proper party defendant in any action brought to contest the election of that candidate.

10. On August 24, 2010, the State of Florida conducted a primary election for numerous offices, including a primary election for the Republican nomination for the Florida Senate, District 12.

11. Results reported on August 25, 2010 for the Republican primary election for Florida Senate, District 12 showed that Plaintiff Kevin Ambler received 14,530 votes (44.05%) and that Defendant Jim Norman received 18,452 votes (55.95%).

12. The Elections Canvassing Commission is expected, based on the results submitted by the local canvassing boards in Hillsborough and Pasco Counties, to

determine and declare that Jim Norman won the primary election for the Republican nomination for the Florida Senate, District 12. Jim Norman would then face two write-in candidates in the November general election.

Requirements to Qualify for Nomination to State Office

13. Pursuant to Section 99.061, Florida Statutes, candidates for election to state office must file qualification papers, and pay qualifying fees, which consists of the filing fee, the election assessment and party assessment, if any, to the Department of State, at any time after noon on the first day of qualifying but before noon on the last day of qualifying. For the 2010 cycle, the qualifying period ended at noon on June 18, 2010.

14. For candidates paying the qualifying fee, the following qualifying papers must be received by the Defendant DEPARTMENT OF STATE, DIVISION OF ELECTIONS no later than noon on June 18, 2010:

- Form DS-DE 9, Appointment of Campaign Treasurer and Designation of Campaign Depository.
- Party Affiliation Candidates: Form DS-DE 24, Loyalty Oath, Oath of Candidate and Statement of Party; and
- Form 6, Full and Public Disclosure of Financial Interests for the year 2009 (and any other forms applicable as identified on Form 6).
- The qualifying fee for Party Affiliated Candidates: \$1,781.82 - 6% of annual salary as of July 1, 2009.

Failure to File Full and Public Disclosure of Financial Interests

15. In seeking to qualify as a Republican candidate for nomination or election

to the Florida Senate, District 12, Jim Norman submitted a Form 6, Full and Public Disclosure of Financial Interests, for the year 2009 to the Defendant Department of State, Division of Elections. A copy of the Form 6, Full and Public Disclosure of Financial Interests, for the year 2009 submitted by Jim Norman during the qualifying period is attached hereto as Exhibit "A."

16. Article II, Section 8(a), Florida Constitution, requires that "[all elected constitutional officers and candidates for such offices and, as may be determined by law, other public officers, candidates, and employees shall file full and public disclosure of their financial interests."

17. Article II, Section 8(i)(1), Florida Constitution, provides:

(1) Full and public disclosure of financial interests shall mean filing with the custodian of state records by July 1 of each year a **sworn statement** showing net worth and identifying **each asset and liability in excess of \$1,000** and its value together with one of the following:

a. A copy of the person's most recent federal income tax return; or

b. A sworn statement which identifies each separate source and amount of income which exceeds \$1,000. The forms for such source disclosure and the rules under which they are to be filed shall be prescribed by the independent commission established in subsection (f), and such rules shall include disclosure of secondary sources of income.

18. Section 112.3144, Florida Statutes, further implements the provisions of Article II, Section 8, Florida Constitution, requiring full and public disclosure of financial interests by candidates for constitutional office.

19. Jim Norman failed to identify on his Form 6, Full and Public Disclosure of Financial Interests for the year 2009, submitted as required in the process of qualifying for the Florida Senate, District 12 office, his ownership of two boats, to wit a 28-foot

pontoon boat with an outboard motor and a 16-foot ski boat with an outboard motor, which are registered to Jim Norman and his wife, Mearline. Each of these boats has a fair market value in excess of \$1,000. These boats were purchased from a company owned by Ed Roleson, Jr., a Miller beer distributor (now deceased), on or about March 6, 2006, by Jim Norman and his wife in conjunction with the cash purchase of a \$435,000 residential lakefront home, including dock, deck, and boathouse, located on Thunderbird Lake at 6 Taos Circle, Cherokee Village, Arkansas. Shortly before March 6, 2006, based on information and belief, Jim Norman accepted a loan for approximately \$435,000, from Tampa businessman, Ralph Hughes (who died unexpectedly on or about June 8, 2008). This loan has not been repaid by Jim Norman, and he failed to identify this liability on his Form 6, Full and Public Disclosure of Financial Interests for the year 2009, submitted as required in the process of qualifying for the Florida Senate, District 12 office.

20. By his failure to list all assets and liabilities having a value in excess of \$1,000 as required by Article II, Section 8, Florida Constitution, and Section 112.3144, Florida Statutes, Jim Norman has not complied with the requirements of Article II, Section 8, Florida Constitution, as well as Section 112.3144, Florida Statutes, and Section 99.061, Florida Statutes, to make a full and public disclosure of financial interests for the year 2009 as required by law.

21. Jim Norman's failure to list all assets and liabilities having a value in excess of \$1,000 as required by Article II, Section 8, Florida Constitution, and Section 112.3144, Florida Statutes, is significant and, as a consequence, he failed to comply with

requirements of Article II, Section 8, Florida Constitution, Section 112.3144, Florida Statutes, and Section 99.061, Florida Statutes, which are mandatory pre-requisites to qualify as a Republican candidate for nomination or election to the Florida Senate, District 12.

22. Because he failed to comply with the mandatory requirements in order to qualify as a Republican candidate for nomination or election to the Florida Senate, District 12, Jim Norman is ineligible for nomination or election to the Florida Senate District 12.

Applicable Administrative Remedies

23. It has been reported that a complaint has been filed with the State of Florida Commission on Ethics which alleges, among other matters, that Defendant Jim Norman failed to disclose on his Form 6 financial disclosure filed with the Defendant Department of State, Division of Elections, as part of the qualifying process his ownership interest in the two in two boats purchased by Jim Norman and his wife in conjunction with the purchase of a \$435,000 residential lakefront home located at 6 Taos Circle, Cherokee Village, Arkansas, in March of 2006. A copy of the complaint filed with the Florida Commission on Ethics against Jim Norman is attached hereto as Exhibit "B."

24. Section 112.317(1)(c), Florida Statutes, provides that the failure to file any disclosure required by Article II, Section 8, Florida Constitution, can result in "disqualification from being on the ballot."¹

¹ Section 112.317(1)(c), Florida Statutes, provides as follows:

25. Upon the completion of its investigation, the Florida Commission on Ethics has a duty to report its findings and recommendations to the appropriate disciplinary official, who in turn shall have the power to order the appropriate elections official to remove the candidate from the ballot for a violation of Article II, Section 8, Florida Constitution.²

26. Because of the compressed time-frames between the filing of the complaint with the Florida Commission on Ethics, the primary election, the printing of the general election ballot, and the general election, the Florida Commission on Ethics

112.317 Penalties. –

(1) Violation of any provision of this part, including, but not limited to, any failure to file any disclosures required by this part or violation of any standard of conduct imposed by this part, or violation of any provision of s. 8, Art. II of the State Constitution, in addition to any criminal penalty or other civil penalty involved, shall, under applicable constitutional and statutory procedures, constitute grounds for, and may be punished by, one or more of the following:

(c) In the case of a candidate who violates the provisions of this part or s. 8(a) and (i), Art. II of the State Constitution:

1. Disqualification from being on the ballot.
2. Public censure.
3. Reprimand.
4. A civil penalty not to exceed \$10,000.

² Section 112.324(8), Florida Statutes, provides as follows:

If, in cases pertaining to complaints other than complaints against impeachable officers or members of the Legislature, upon completion of a full and final investigation by the commission, the commission finds that there has been a violation of this part or of s. 8, Art. II of the State Constitution, it shall be the duty of the commission to report its findings and recommend appropriate action to the proper disciplinary official or body as follows, and such official or body shall have the power to invoke the penalty provisions of this part, including the power to order the appropriate elections official to remove a candidate from the ballot for a violation of s. 112.3145 or s. 8(a) and (i), Art. II of the State Constitution:

will be unable to complete its investigation and report its findings to the appropriate disciplinary official in time to remove Jim Norman from the 2010 general election ballot.

Prayer for Relief

Wherefore, Plaintiff Kevin Ambler prays that the Court:

A. Convene a status conference promptly to establish an expeditious schedule for completing discovery and conducting a hearing for final determination of the violations of law by Jim Norman alleged herein.

B. Set this matter for a prompt hearing pursuant to Section 102.168(7), Florida Statutes.

C. Order the Elections Canvassing Commission to declare void the results of the August 24, 2010 Republican primary election for the Florida Senate District 12.

D. Order the Elections Canvassing Commission to declare and certify Kevin Ambler, the nominee of the Republican Party for the Florida Senate, District 12, as the only duly qualified Republican candidate for the Florida Senate, District 12, and order the Defendant Department of State, Division of Election, to notify Defendant Earl Lennard and Defendant Byron E. Corley that Kevin Ambler is the nominee of the Republican Party for the Florida Senate, District 12.

E. Enjoin Defendant Earl Lennard and Defendant Byron E. Corley from including Defendant Jim Norman on the 2010 general election ballot as the nominee of the Republican Party for the Florida Senate, District 12, and order Defendant Earl Lennard and Defendant Byron E. Corley to include Kevin Ambler on the 2010 general election ballot as the nominee of the Republican Party for the Florida Senate, District 12.

F. Order all other appropriate relief, including an award of fees and costs.

Respectfully submitted this 31st day of August, 2010, by:



Mark Herron, Esq.

Florida Bar No.: 0199737

Email: mherron@lawfla.com

Albert T. Gimbel, Esq.

Florida Bar No.: 0279730

Email: tgimbel@lawfla.com

MESSER, CAPARELLO & SELF, P.A.

Post Office Box 15579

Tallahassee, Florida 32317-5579

Telephone: (850) 222-0720

Facsimile: (850) 224-4359

Counsel for Plaintiffs

FINANCIAL INTERESTS

FILED

James Norman
 County Commissioner
 Hillsborough County
 Elected Constitutional Officer
 601 E KENNEDY BLVD 2ND FLOOR, COUNTY CENTER
 TAMPA, FL 33602-4156

FOR OFFICE USE ONLY: JUN 14 AM 10:35



ID No. 9957
 Conf Code
 P. Req. Code *****

Norman, James

CHECK IF THIS IS A FILING BY A CANDIDATE

PART A - NET WORTH

Please enter the value of your net worth as of December 31, 2009, or a more current date. [Note: Net worth is not calculated by subtracting your reported liabilities from your reported assets, so please see the instructions on page 3.]

My net worth as of 6/1, 2010 was \$ 901,785.

PART B -- ASSETS

HOUSEHOLD GOODS AND PERSONAL EFFECTS:

Household goods and personal effects may be reported in a lump sum if their aggregate value exceeds \$1,000. This category includes any of the following not held for investment: jewelry; collections of stamps, guns, and numismatic items; art objects; household equipment and furnishings; clothing; other household items; and vehicles for personal use.

The aggregate value of my household goods and personal effects (described above) is \$ 65,000.

ASSETS INDIVIDUALLY VALUED AT OVER \$1,000:

DESCRIPTION OF ASSET (specific description is required - see Instructions p.4)

VALUE OF ASSET

DESCRIPTION OF ASSET (specific description is required - see Instructions p.4)	VALUE OF ASSET
Home - [redacted]	\$205,000.
retirement acct - County 401k	\$292,000.
4 retirement acct (SAL Army \$161,000) stock investments (44,340) attached	\$205,340.
Savings acct (\$16,000) Savings Bonds (\$41,000)	\$117,000.
2-Auto's (Chevy Tahoe \$3500.) (GMC-SRX \$20,000)	\$23,500.

PART C -- LIABILITIES

LIABILITIES IN EXCESS OF \$1,000:

NAME AND ADDRESS OF CREDITOR

AMOUNT OF LIABILITY

NAME AND ADDRESS OF CREDITOR	AMOUNT OF LIABILITY
Home (Taxes & Insurance)	\$6005.00

JOINT AND SEVERAL LIABILITIES NOT REPORTED ABOVE:

NAME AND ADDRESS OF CREDITOR

AMOUNT OF LIABILITY

HAND DELIVERED

NAME AND ADDRESS OF CREDITOR	AMOUNT OF LIABILITY

PART D -- INCOME

You may EITHER (1) file a complete copy of your 2009 federal income tax return including all attachments, OR (2) file a sworn statement identifying each source and amount of income which exceeds \$1,000 including secondary sources of income, by completing the remainder of Part D, below.

I elect to file a copy of my 2009 federal income tax return (if you check this box and attach a copy of your 2009 tax return, you need not complete the remainder of Part D).

PRIMARY SOURCES OF INCOME:

NAME OF SOURCE OF INCOME EXCEEDING \$1,000	ADDRESS OF SOURCE OF INCOME	AMOUNT
THE SALVATION ARMY Hillsborough County	VAN DYKE RD, TAMPA, FL County Center, TAMPA, FL 6001 E. Kennedy	\$95,000 92,000

SECONDARY SOURCES OF INCOME (Major customers, clients, etc., of businesses owned by reporting person - see instructions):

NAME OF BUSINESS ENTITY	NAME OF MAJOR SOURCES OF BUSINESS INCOME	ADDRESS OF SOURCE	PRINCIPAL BUSINESS ACTIVITY OF SOURCE

PART E -- INTERESTS IN SPECIFIED BUSINESSES

	BUSINESS ENTITY # 1	BUSINESS ENTITY # 2	BUSINESS ENTITY # 3
NAME OF BUSINESS ENTITY			
ADDRESS OF BUSINESS ENTITY			
PRINCIPAL BUSINESS ACTIVITY			
POSITION HELD WITH ENTITY			
OWN MORE THAN A 5% INTEREST IN THE BUSINESS			
NATURE OF MY OWNERSHIP INTEREST			

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

OATH

I, the person whose name appears at the beginning of this form, do depose on oath or affirmation and say that the information disclosed on this form and any attachments hereto is true, accurate, and complete.

STATE OF FLORIDA
COUNTY OF Hillsborough
Sworn to (or affirmed) and subscribed before me this 8th day of


July, 2010 by Jim Norman

(Signature of Notary Public - State of Florida)


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

Personally Known OR Produced Identification

Type of Identification Produced _____


SIGNATURE OF REPORTING OFFICIAL OR CANDIDATE

FILING INSTRUCTIONS for when and where to file this form are located at the top of page 3. INSTRUCTIONS on who must file this form and how to fill it out begin on page 3. OTHER FORMS you may need to file are described on page 6.

HAND DELIVERED

Stock Investments

Home Dep	\$ 600.
Tampa Elec	\$ 11,600.
Ford	\$ 6,700.
BA	\$ 1,010.
Whirlpool	\$ 1,200.
Proc Gamble	\$ 11,200.
PFE	\$ 12,030.
Total	\$ 44,340.

STATE OF FLORIDA
COMMISSION ON ETHICS
P. O. DRAWER 15709, TALLAHASSEE, FLORIDA 32317-5709

COMPLAINT

1. PERSON BRINGING COMPLAINT:

Name: Paul M. Phillips Telephone Number: 813-465-1612

Address: 2218 Eagle Bluff Drive

City: Valrico County: Hillsborough Zip Code: 33596

2. PERSON AGAINST WHOM COMPLAINT IS BROUGHT:

Current or former public officer, public employee, candidate, or lobbyist - please use one complaint form for each person you wish to complain against:

Name: Jim Norman Telephone Number: 813-272-5725

Address: P. O. Box 1110

City: Tampa County: Hillsborough Zip Code: 33601

Title of office or position held or sought: County Commissioner (at large)

3. STATEMENT OF FACTS:

Please explain your complaint fully, either on the reverse side of this form or on additional sheets, providing a detailed description of the facts and the actions of the person named above. Include relevant dates and the names and addresses of persons whom you believe may be witnesses. If you believe that a particular provision of Article II, Section 8, Florida Constitution (the Sunshine Amendment) or of Part III, Chapter 112, Florida Statutes (the Code of Ethics for Public Officers and Employees) has been violated, please state the specific section(s). Please do not attach copies of lengthy documents; if they are relevant, your description of them will suffice. Also, please do not submit video tapes or audio tapes.

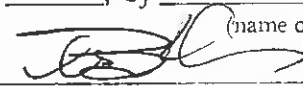
4. OATH

I, the person bringing this complaint, do depose on oath or affirmation and say 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 HILLSBOROUGH

Sworn to (or affirmed) and subscribed before me this 19th day of AUGUST

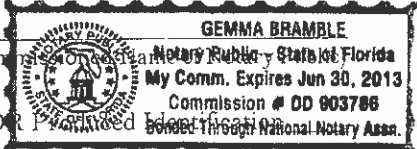
20 10, by PAUL M. PHILLIPS


(name of person making statement)

(Signature of Notary Public - State of Florida)


SIGNATURE OF COMPLAINANT

(Print, Type, or Stamp Commission Seal)



Personally Known OR Produced by

Type of Identification Produced:

**State of Florida
COMMISSION ON ETHICS
P.O. Drawer 15709
Tallahassee, Florida 32317-5709**

COMPLAINT – STATEMENT OF FACTS

Jim Norman is a Hillsborough County Commissioner (at large) who has held office as a County Commissioner continuously since 1992. He is required under Florida's ethics laws to file annually, by July 1st, a Statement of Financial Interests - Form 1, because he is a Local Officer as defined in Section 112.3145(1)(a), Florida Statutes. He is also a candidate for Florida Senate, District 12, and therefore was required to file a Full and Public Disclosure of Financial Interests - Form 6, because he is a candidate for the Florida Senate. Based on information and belief, Mr. Norman has filed his required Form 1 financial disclosures each year for the last 5 years with the Hillsborough County Supervisor of Elections, and he timely filed his Form 6 with the Florida Department of State, Division of Elections prior to qualifying for the Florida Senate, District 12.

On March 6, 2006, Mr. Norman and his wife Mearline became the co-owners of two boats (a 28-foot pontoon boat with an outboard motor and a 16-foot ski boat with outboard motor). The vessel registrations for these two boats were filed in Arkansas in the names of Jim Norman and Mearline Norman. The reasonable fair market value of these two boats with their outboard motors at the time of purchase, and currently, is in excess of the \$1000 threshold for the required reporting of assets by public officials. This means that these boats should have been listed each year on Mr. Norman's Form 1's since 2006 and on his Form 6 filed in June 2010. However, in each instance he failed to report these assets on his annual financial disclosures as required by Florida law.

The boats were purchased by Mr. and Mrs. Norman in conjunction with the purchase of a residential lakefront home located at 6 Taos Circle, Cherokee Village, Arkansas. The lakefront home was titled in the name of Mearline Norman only, and was purchased for \$435,000 in cash. Since the day it was acquired with Mrs. Norman's name on the title, there has not been any mortgage on the home which includes a large concrete boat house and dock on the lake. The home and boats were sold by a company owned by Ed Roleson, Jr., a Miller beer distributor who is now deceased.

According to recent press reports, Hillsborough County Commissioner Jim Norman says he had nothing to do with his wife's cash purchase of a \$435,000 home in Arkansas, yet during all of 2005 and 2006, Mr. Norman served as a member of the Tampa Sports Authority (TSA), a public body which is subject to the Sunshine law and financial disclosure laws. In October 2005, the TSA agreed to the construction of a large Miller beer patio deck (capacity about 200) in the south end-zone of the Raymond James Stadium. The Stadium is owned by the TSA and/or Hillsborough County and is

managed and maintained by the TSA. The Miller beer patio deck was completed in June 2006. This was the first structure of its type ever built in Raymond James Stadium by Miller beer. From October 2005 to June 2006, Mr. Norman never revealed or reported the purchase of the Arkansas lakefront home titled in his wife's name, that was purchased from a Miller beer distributor. Based on information and belief, the \$435,000 purchase price was substantially less than the original asking price for the property, even though the sale was closed during the height of the national real estate boom.

The boats, which were registered to Mr. Norman and his wife at the time of purchase in March 2006, have remained registered that way, records show.

Mr. Norman has said in recent press reports that his wife put his name on the boat registrations "for liability and insurance purposes, she told me, in case I used them. I didn't realize she'd done that."

Mr. Norman has said his wife bought the lakefront home in Arkansas as an investment with the help of partners whose names are being kept secret. Florida and Arkansas state records don't show her as being part of any corporation or partnership, and Mrs. Norman does not have any visible means of earning income.

Mr. Norman has stated in recent press accounts that: "Her investors are her investors and she has a right to have her own career," he said, describing any questions about her partners as a political attack.

Mr. Norman has acknowledged in recent press accounts that he and his wife file joint tax returns, but he doesn't want to release them. Notwithstanding that the two boats at the Arkansas home have not been listed on Mr. Norman's annual financial disclosures since 2006, he has maintained, according to recent press accounts: "I've already submitted all my personal financial disclosures that are required by law," he said.

Based on information and belief and recent press accounts, Mr. Norman has failed to reveal on any of his required State of Florida financial disclosure forms since 2006, that Ralph Hughes was the source of the \$435,000 that was used to purchase the lakefront home in Arkansas in 2006 that is titled in Mearline Norman's name. Ralph Hughes, who died in June 2008, was a very significant political contributor to Jim Norman for more than 10 years, and Mr. Hughes and his companies have had a considerable number of issues affecting him and his companies, including CastCrete, come before the Hillsborough County Commission during the time that Jim Norman has served as a Hillsborough County Commissioner. Mr. Norman and his wife have never repaid any of the \$435,000 to Ralph Hughes, his estate, his heirs, or his companies. This money either constitutes an unreported loan or unreported income of Jim Norman which should have been disclosed on his Form 1's filed since 2006 and on his Form 6 filed in 2010. The failure to disclose the source of the funds from Ralph Hughes, coupled with the act of solely listing Mearline Norman on the title to the Arkansas lakefront home, was done deliberately to conceal an obvious conflict of interest for Mr. Norman, and an illegal gift to him and/or his spouse.

Separate and apart from Mr. Norman's knowing and wilful failure to disclose financial information required to be included on the Form 1's for multiple years, and on his Form 6, which was done in an effort to conceal assets, liabilities and/or sources of funds, Mr. Norman has violated Florida law by working as an unregistered lobbyist. As background, according to recent press reports and based on Mr. Norman's filed financial disclosures, in addition to his job as a Hillsborough County Commissioner for the past 18 years (currently earning more than \$90,000 per year, plus a monthly car allowance), Mr. Norman has also been employed full time for over 30 years by the Salvation Army (currently earning \$95,000 per year, plus a free car). During each legislative session of the Florida Legislature from at least 2003 through 2007, Mr. Norman, on behalf of the Salvation Army, has acted as a lobbyist for the Salvation Army by requesting that members of the Florida Legislature include line items and funding allocations in the State's annual fiscal year budget for specific on-going Salvation Army programs in Florida, and these items were funded in the State budgets for those years. Jim Norman has never registered as a lobbyist as is required by Florida law, and he has never filed the required disclosures that are required of registered lobbyists.