

CITY OF JACKSONVILLE



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November 26, 2019

Ms. Sandra Anderson
10200 Belle Rive Blvd Unit 211
Jacksonville, FL 32256

RE: Dismissal of Ethics Commission Complaint 2018-H and Letter of Instruction

Dear Ms. Anderson,

On July 26, 2018, the Office of Ethics, Compliance and Oversight (OECO) received a letter from Mr. Kurt Kraft alleging that you took the following actions in your role as an employee of the Property Appraiser's Office:

- misused City equipment to post campaign contribution information for Property Appraiser Jerry Holland's re-election campaign on the City of Jacksonville's (City) Property Appraiser website; and
- misused City equipment and time to work on the Property Appraiser's re-election campaign

The OECO presented the allegations to the Ethics Commission Complaints Committee in an Executive Session "Shade" meeting on September 10, 2018. Per the Jacksonville Ethics Commission Complaint Procedures Rule 9(c)(2), the Complaints Committee voted to refer the matter to the Office of Inspector General (OIG) for investigation and recommendations.

On August 7, 2019, the OIG issued a Letter of Closure to Mr. Kraft advising him of the findings of their investigation. A copy of the Letter of Closure is enclosed for your review. Briefly, the OIG findings substantiated that you inadvertently posted information to the Property Appraiser's website about the re-election campaign for the Property Appraiser, including information about how to make campaign contributions. The OIG findings did not substantiate that you used City equipment or time to work on the Property Appraiser's re-election campaign.

Subsequently, the Ethics Commission Complaints Committee considered the findings of the OIG investigation during an Executive Session "Shade" meeting on October 7, 2019. Based on the OIG findings, the Complaints Committee voted to dismiss the complaint against you under Ethics Commission

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Complaint Procedures Rule 17(a)(2)¹. Additionally, the Complaints Committee voted to issue a letter of instruction to you in order to provide you with education about a recent significant change to the Jacksonville Ethics Code section 602.401.

Letter of Instruction to Sandra Anderson

While the Complaints Committee dismissed the complaint against you because the OIG found that your actions in posting campaign related information were unintentional, it is imperative that you be advised of a recent significant change to Jacksonville Ethics Code section 602.401 that addresses misuse of City resources for campaign purposes. Section 602.401(d)(3) now prohibits the “use [of] any City resources, including property, employee time, computers and the Internet, for any political campaigning or campaign fundraising activities.” Any actions prohibited by section 602.401(d)(3) may be determined to be a violation of this section regardless of whether the actions are unintentional. By this letter of instruction and pursuant to section 602.401(d)(3), you are advised to refrain from using City resources, including work time, to engage in any campaign related activities.

Sincerely,

See original for signature

Ellen Schmitt
Chair of Ethics Commission Complaints Committee

Encl: OIG Letter of Closure

cc: Jerry Holland, City of Jacksonville Property Appraiser

¹ Rule 17(a)(2) provides: “The Complaints Committee . . . may, at their discretion . . . [d]ismiss a Complaint and issue a letter of instruction to the Respondent when it appears that the alleged violation was inadvertent, unintentional or insubstantial.”