



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

FLORIDA
COMMISSION ON ETHICS

JUN 24 2024

RECEIVED
ORIGINAL

COMPLAINT

24-135

1. PERSON BRINGING COMPLAINT:

Name: Robert Burns Telephone Number: 4078103200
Address: 3146 Verdi Cir
City: Palm Bay County: Brevard State: FL Zip Code: 32905

2. PERSON AGAINST WHOM COMPLAINT IS BROUGHT:

Use a separate complaint form for each person you wish to complain against:

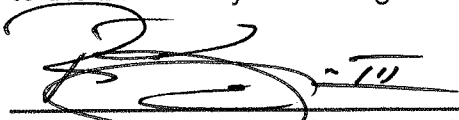
Name: Randall Fine Telephone Number: 3219876101
Address: 103 Oak St
City: Melbourne Beach County: Brevard Zip Code: 32951
Title of office or position held or sought: State Representative 33/Florida Senate 19

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. Include relevant dates and the names and addresses of persons 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, CDs, DVDs, flash drives or other electronic media; such material will not be considered part of the complaint and will be returned.

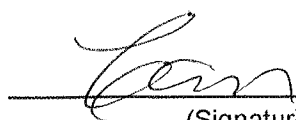
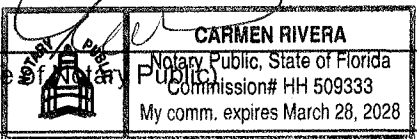
4. OATH

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.


SIGNATURE OF COMPLAINANT

STATE OF FLORIDA
COUNTY OF Brevard

Sworn to (or affirmed) and subscribed before me by means of ☒ physical presence or ☐ online notarization, this 24 day of June, 2024, by Robert Burns (name of person making statement)


(Signature of Notary Public)

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

Personally Known ☐ OR Produced Identification ☒
Type of Identification Produced: FD

June 6, 2024

To: Florida Commission on Ethics

Subject: Request for Ethics Investigation into Financial Misconduct and False Reporting by State Representative Randall A. Fine

I. Summary of Complaint

I am writing to formally request an ethics investigation into the financial activities and disclosures of State Representative Randall A. Fine, an elected official in the State of Florida and a current candidate for Florida Senate District 19. This request is based on substantial evidence indicating potential false reporting, tax evasion, and ongoing illegal business operations in violation of Florida ethics statutes.

II. Background and Findings

A. Jayvid Holdings, LLC

1. Creation and Dissolution: Jayvid Holdings, LLC was established in the state of Florida in 2016 and dissolved in 2017 due to failure to file an annual report. A search of all 50 states in the US results in no registration of this entity besides Florida.

2. Continued Operations: Despite its dissolution, Randall A. Fine has reported substantial income from Jayvid Holdings, LLC on his Form 6 financial disclosures since 2016. In his most recent filing for 2023, he claimed \$329,707 in annual income from this entity.

3. Address Discrepancies: The address listed for Jayvid Holdings, LLC (103 Oak Street, Melbourne Beach, FL) does not match any records on Sunbiz, the official registry for Florida businesses. The last known address for Jayvid Holdings, LLC was 490 Spoonbill Lane, Melbourne Beach, FL. Fine's 2023 Form 6 lists the Jayvid Holdings, LLC address as 103 Oak St; 2022 lists it as 490 Spoonbill Lane; 2021 lists it as 490 Spoonbill, which is crossed out and replaced with 103 Oak St; 2020 and 2019 list Spoonbill.

4. Inconsistent Records: No active records or registrations of Jayvid Holdings, LLC, nor any other business exist under the address provided by Randall A. Fine.

5. Asset Valuation: The initial listed value of Jayvid Holdings, LLC in 2016 was \$14,700,000. Randall A. Fine now lists its value at \$21,200,000 in the 2023 Form 6 report, despite the entity being inactive since 2016.

B. Fine Consulting, Inc. (The Fine Point Group, Inc.)

1. Status: Fine Consulting, Inc. is currently inactive, having had its status revoked for failing to file an annual report as of September 22, 2017.

2. Reported as an Asset: Despite its inactive status, Randall A. Fine has listed Fine Consulting, Inc. as a significant asset under Jayvid Holdings, LLC in his 2017 Form 6 filing.

3. Lack of Transparency: Since Fine Consulting, Inc. is defunct, and he has not listed any other assets of Jayvid Holdings, LLC, it is unclear what other assets (if any) are held in this defunct holding company.

C. Inflation of Net Worth

1. Home Valuation: Fine has grossly inflated the value of his home in his financial disclosures. For his 2023 Form 6, he lists the value of his residence at 103 Oak Street at \$5.85 million. The Brevard County Property Appraiser lists the home's market value at \$3.89 million (a \$2 million difference) and a tax-assessed value of \$2.35 million.

2. Previous Years: For 2022 and 2021, the Brevard County Property Appraiser lists the fair market value at \$3.44 million and \$2.25 million respectively. Fine listed the values at \$4.98 million and \$4.66 million respectively. He did the same for all previous years and even stipulated one year that he based the value on a "Zestimate."

D. Concealment of Assets

1. Undisclosed Personal Assets: Fine's divorce decree from his first wife lists numerous personal assets valued over \$1,000. This document is available upon request due to its size. None of these assets are listed on any of his Form 6s. Additionally, personal vehicles, his Rolex watch, and other assets valued over \$1,000 are not disclosed.

E. Personal Loan of \$250,000

1. Loan Details: Fine lists a \$250,000 loan to the PAC Friends of Randy Fine (formerly known as Foundation for Our Children's Future) as an asset. Campaign finance reports show that Fine loaned this amount to the PAC from Fine Consulting, Inc. (the defunct entity).

2. Repayment Issues: In 2018, Fine reported a partial repayment of \$50,000 to Fine Consulting, Inc., despite its dissolution. In 2016, partial repayments of \$20,000 and \$30,000 were reported to the same defunct business.

3. Misrepresentation: Since the loan did not originate from Fine himself but from his defunct business, listing it as a personal loan inflates his net worth and constitutes misrepresentation and/or fraud.

III. Violations of Florida Ethics Statutes

A. False Reporting:

Section 112.313(6), Florida Statutes: This section prohibits public officers from corruptly using or attempting to use their official positions to secure a special privilege, benefit, or exemption for themselves or others. By falsely reporting income and assets from dissolved entities, Randall A. Fine may have violated this statute.

B. Misuse of Public Position:

Section 112.313(8), Florida Statutes: This section prohibits public officers from knowingly withholding information that is required to be disclosed and making false statements to mislead others. The discrepancies in Randall A. Fine's financial disclosures suggest a violation of this statute.

C. Financial Disclosure Violations:

Section 112.3144, Florida Statutes: This section mandates the filing of full and public disclosures of financial interests by public officers. False information and inaccuracies in these disclosures, as seen in Randall A. Fine's Form 6 filings, violate this statute.

IV. Requested Actions

I urge the Florida Commission on Ethics to conduct a thorough investigation into these matters. Specifically, I request that you:

1. **Verify the Income Claims:** Investigate the legitimacy of the reported income from Jayvid Holdings, LLC and Fine Consulting, Inc. and their reported values.
2. **Examine Financial Disclosures:** Review Randall A. Fine's Form 6 financial disclosures for accuracy and compliance with legal requirements.
3. **Investigate Business Operations:** Determine if any illegal business operations are being conducted under the dissolved entities and take appropriate legal action if necessary.
4. **Enforce Compliance:** Ensure that any violations of Florida ethics statutes are addressed through appropriate sanctions and penalties.

The evidence strongly suggests that State Representative Randall A. Fine has engaged in activities that violate state ethics laws concerning financial reporting, business operations, and tax compliance. An immediate and thorough investigation is necessary to uphold the integrity of public office and ensure compliance with the law. This complaint is filed to cover all years within the statute of limitations since his election into office. Given the nature of this complaint and others where probable cause has already been found, it is imperative to protect the integrity of the office he holds and intends to hold by removing him from his current office and/or the ballot for the position he is currently running for.

I am prepared to provide any additional information or documentation required to support this request. Thank you for your attention to this urgent matter.

Sincerely,



Robert W. Burns III



[Department of State](#) / [Division of Corporations](#) / [Search Records](#) / [Search by Entity Name](#) /

Detail by Entity Name

Florida Limited Liability Company
JAYVID HOLDINGS, LLC

Filing Information

Document Number	L16000089227
FE/EIN Number	NONE
Date Filed	05/05/2016
State	FL
Status	INACTIVE
Last Event	ADMIN DISSOLUTION FOR ANNUAL REPORT
Event Date Filed	09/22/2017
Event Effective Date	NONE

Principal Address

490 SPOONBILL LANE
MELBOURNE BEACH, FL 32951

Mailing Address

490 SPOONBILL LANE
MELBOURNE BEACH, FL 32951

Registered Agent Name & Address

WHITE, BRADLEY F
1795 W. NASA BOULEVARD
MELBOURNE, FL 32901

Authorized Person(s) Detail

Name & Address

Title MGR

FINE, RANDALL A
490 SPOONBILL LANE
MELBOURNE BEACH, FL 32951

Annual Reports

No Annual Reports Filed

Document Images

05/05/2016 -- Florida Limited Liability

[View image in PDF format](#)

10. 11. 2020. 10. 11. 2020. 10. 11. 2020.



[Department of State](#) / [Division of Corporations](#) / [Search Records](#) / [Search by Entity Name](#) /

Detail by Entity Name

Foreign Profit Corporation

THE FINE POINT GROUP, INC.

Cross Reference Name

FINE CONSULTING, INCORPORATED

Filing Information

Document Number	F08000000617
FEI/EIN Number	61-1290173
Date Filed	02/11/2008
State	KY
Status	INACTIVE
Last Event	REVOKED FOR ANNUAL REPORT
Event Date Filed	09/22/2017
Event Effective Date	NONE

Principal Address

490 SPOONBILL LANE
MELBOURNE BEACH, FL 32951

Mailing Address

490 SPOONBILL LANE
MELBOURNE BEACH, FL 32951

Registered Agent Name & Address

FINE, WENDY L
490 SPOONBILL LANE
MELBOURNE BEACH, FL 32951

Officer/Director Detail

Name & Address

Title P

FINE, RANDALL A
490 SPOONBILL LANE
MELBOURNE BEACH, FL 32951

Title VP

FINE, WENDY L
490 SPOONBILL LANE
MELBOURNE BEACH, FL 32951

Annual Reports

Report Year	Filed Date
2014	02/28/2014
2015	01/12/2015
2016	02/10/2016

Document Images

02/10/2016 -- ANNUAL REPORT	View image in PDF format
01/12/2015 -- ANNUAL REPORT	View image in PDF format
02/28/2014 -- ANNUAL REPORT	View image in PDF format
01/24/2013 -- ANNUAL REPORT	View image in PDF format
01/06/2012 -- ANNUAL REPORT	View image in PDF format
01/19/2011 -- ANNUAL REPORT	View image in PDF format
01/07/2010 -- ANNUAL REPORT	View image in PDF format
01/16/2009 -- ANNUAL REPORT	View image in PDF format
02/11/2008 -- Foreign Profit	View image in PDF format

2023 Form 6 - Full and Public Disclosure of Financial Interests

Filed with COE: 05/31/2024

General Information

Name: Hon Randall A. Fine

Address: 2539 Palm Bay Rd Ne Ste 5, Palm Bay, FL 32905

PID 266445

County: Brevard

AGENCY INFORMATION

Organization	Suborganization	Title
House Of Representatives	Elected Constitutional Officer	State Representative

CANDIDATE FOR

Position	Agency Name	Position sought or held
State Senate	State Senate	State Senator, District 19

Net Worth

My Net Worth as of April 30, 2024 was \$ 30,338,772.00.

2023 Form 6 - Full and Public Disclosure of Financial Interests

Filed with COE: 05/31/2024

Assets

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, if not held for investment purposes: jewelry; collections of stamps, guns, and numismatic items; art objects; household equipment and furnishings; clothing; other household items; and vehicles for personal use, whether owned or leased.

The aggregate value of my household goods and personal effect is \$ 1,900,294.00.

ASSETS INDIVIDUALLY VALUED AT OVER \$1,000:

Description of Asset	Value of Asset
Home	\$ 5,848,000.00
Checking Account	\$ 47,936.00
401-K	\$ 199,295.00
Personal Loans	\$ 250,000.00
See Attached	\$ 22,093,247.00
See Attached	

Liabilities

LIABILITIES IN EXCESS OF \$1,000:

Name of Creditor	Address of Creditor	Amount of Liability
N/A		

JOINT AND SEVERAL LIABILITIES NOT REPORTED ABOVE:

Name of Creditor	Address of Creditor	Amount of Liability
N/A		

Income

Identify each separate source and amount of income which exceeded \$1,000 during the year, including secondary sources of income. Or attach a complete copy of your 2023 federal income tax return, including all W2s, schedules, and attachments. Please redact any social security or account numbers before attaching your returns, as the law requires these documents be posted to the Commission's website.

☐ I elect to file a copy of my 2023 federal income tax return and all W2s, schedules, and attachments.

PRIMARY SOURCES OF INCOME:

Name of Source of Income Exceeding \$1,000	Address of Source of Income	Amount
State of Florida	200 E Gaines Street, Tallahassee, FL 32399	\$ 29,697.00
Jayvid Holdings, LLC	103 Oak Street, Melbourne Beach, FL 32951	\$ 329,707.00

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

Name of Business Entity	Name of Major Sources of Business' Income	Address of Source	Principal Business Activity of Source
N/A			

Interests in Specified Businesses**Business Entity # 1**

N/A

Training

This section applies only to a Constitutional or elected municipal officer, each of whom are required to complete annual ethics training pursuant to Section 112.3142, F.S.

- ☐ I certify that I have completed the required training under Section 112.3142, F.S.
- ☒ Required training under Section 112.3142, F.S., not applicable to filer for this form year.

Signature of Reporting Official or Candidate

Under the penalties of perjury, I declare that I have read the foregoing Form 6 and that the facts stated in it are true.

Randall A. Fine

Digitally signed: 05/31/2024

Filed with COE: 05/31/2024

RANDY FINE, FORM 6

Attachment A

Property at 103 Oak Street; Melbourne Beach, FL 32951 (Insurance Replacement Estimate plus land value estimate)	\$5,848,000
Checking Accounts, JP Morgan, 115 Palm Bay Road, NE, West Melbourne, FL 32904	\$47,936
401-K (non self-directed), Paychex Inc.; 1001 Heathrow Park Lane Suite 2001, Lake Mary, FL 32946 (100% Invested in Clearbridge Aggressive Growth Fund)	\$199,295
Personal Loans to Friends of Randy Fine One Independent Drive, Suite 1300; Jacksonville, FL 32202	\$250,000
IRA (held at JP Morgan; Palm Beach, Florida)	(total - \$881,168)
Investments worth more than \$1K	
Cash Accounts	
US Dollar JPM Deposit Sweep	\$4,204
JPM Money Market Premier	\$133,017
Stocks	
Abbott Laboratories	\$7,623
Abbvie Inc Com	\$11,781
Alcon, Inc.	\$1,070
Apple Inc	\$134,319
AT&T Inc	\$2,834
Berkshire Hathaway CL-B New	\$22,443
Colgate Palmolive Co	\$8,195
Conocophillips	\$8,590
Corteva Inc.	\$1,161
Dow Inc.	\$1,198
Dupont De Nemours Inc-W/D	\$1,717
Exxon Mobil Corp	\$5,738
General Electric Co	\$4,427
GE Vernova, Inc.	\$1,052
Home Depot Inc	\$37,940
Intel Corp	\$6,329
Johnson & Johnson	\$13,831
JPMorgan Chase & Co	\$22,952
Lowes Companies Inc	\$51,077
Merck & Co Inc New Com	\$18,241
Microsoft Corp	\$76,382

Pepsico Inc NC	\$6,816
Pfizer Inc	\$5,705
Philip Morris Intl Inc	\$4,007
Phillips 66 Com	\$5,168
Procter & Gamble	\$12,173
Verizon Communications	\$4,472
Wal Mart Stores Inc	\$17,334
Wells Fargo & Co New	\$9,199
3M Company	\$3,909
Novartis AG ADR	\$6,137
Exchange-Traded and Closed-End Funds	
Ishares Global Energy ETF	\$12,218
Ishares S&P Mid-Cap 400 G ETF	\$12,457
Ishares S&P Mid-Cap 400 V ETF	\$11,528
Ishares Morningstar SML CP GRWT	\$10,907
Invesco QQQ TR (QQQ)	\$31,528
Mutual Funds	
Fidelity 500 Index INV	\$91,550
Fidelity Capital & Inc Bond	\$5,706
Fidelity Convertible Secs	\$4,915
Fidelity Floating HR HI INC	\$4,846
Fidelity New Markts Inc Bond	\$3,980
Fidelity Select Health Care	\$26,146
Fidelity Short-Term Bond	\$10,063
Loomis Sayles Bond Inst	\$1,286

JAYVID HOLDINGS, LLC – 103 Oak Street; Melbourne Beach, Florida \$21,212,079
Method of valuation: estimate of fair market value; 100% owner

RANDY FINE, FORM 6

Attachment B

Part D – INCOME

Primary Sources of Income

State of Florida; 200 E Gaines Street; Tallahassee, FL 32399 \$29,697

Jayvid Holdings, LLC; 103 Oak Street, Melbourne Beach, FL 32951 \$329,707

Secondary Source of Income

Jayvid Holdings, LLC

JPMorgan Chase; 115 Palm Bay Road, NE; West Melbourne FL 32904 – Financial Institution

Goldman Sachs & Co.; 200 S. Biscayne Blvd., Suite 3700; Miami, FL 33131 – Financial Institution



Campaign Contributions

Friends of Randy Fine

[About the Campaign Finance Data Base](#)

Rpt Yr	Rpt Type	Date	Amount	Contributor Name	Address	City State Zip
2018	M12	12/04/2018	-50,000.00	FINE CONSULTING INC	4651 BABCOCK ST, STE 18-202	PALM BAY, FL 32905
			-50,000.00			

1 Contribution(s) Selected

[Query the Campaign Finance Data Base](#)

[\[Department of State\]](#) [\[Division of Elections\]](#) [\[Candidates and Races\]](#) [\[Campaign Finance Information\]](#)



Campaign Contributions

Friends of Randy Fine

[About the Campaign Finance Data Base](#)

Rpt Yr	Rpt Type	Date	Amount	Contributor Name	Address	City State Zip
2016	M1	12/16/2015	250,000.00	FINE CONSULTING INC. D/B/A FIN	3960 HOWARD HUGHES PARKWAY, SUITE 500	LAS VEGAS, NV 89169
2016	M1	01/13/2016	-249,965.00	FINE CONSULTING INC. D/B/A FIN	3960 HOWARD HUGHES PARKWAY, SUITE 500	LAS VEGAS, NV 89169
2016	M1	01/14/2016	250,000.00	FINE CONSULTING INC. D/B/A FIN	3960 HOWARD HUGHES PARKWAY, SUITE 500	LAS VEGAS, NV 89169
2016	M1	01/15/2016	-30.00	FINE CONSULTING INC. D/B/A FIN	3960 HOWARD HUGHES PARKWAY, SUITE 500	LAS VEGAS, NV 89169
			250,005.00			

4 Contribution(s) Selected

[Query the Campaign Finance Data Base](#)

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