



# The Florida House of Representatives

## Rules & Calendar Council

**Marco Rubio**  
Speaker

**David Rivera**  
Chair

May 20, 2008

The Honorable Marco Rubio  
Speaker, Florida House of Representatives  
Suite 420, The Capitol  
402 South Monroe Street  
Tallahassee, Florida 32399-1300

BY HAND DELIVERY

RE: Complaint against Rep. Paige Kreegel, No. 08-01

Dear Mr. Speaker:

On April 23, 2008, the Rules & Calendar Council received a complaint against Rep. Paige Kreegel, a copy of which is attached hereto. Pursuant to Rule 16.2(b)(4), I have examined the complaint. I have determined that some of the alleged violations are not well founded, as explained in my letter to the complainant, attached hereto. It is my determination that the complaint otherwise satisfies the requirements of Rule 16.2(a) and that one allegation against Rep. Kreegel does allege facts sufficient to constitute a violation. That allegation is contained in paragraph 3.a. of the complaint.

The sufficient allegation is that Rep. Kreegel directed his legislative aide to contact the employer of an announced candidate (against Rep. Kreegel's re-election) to provide publicly available information that might damage the relationship between the employer and the employee/opponent. The complaint alleges that this conduct violated §106.15(3), Florida Statutes.<sup>1</sup> At the time of the incident in question, Rep. Kreegel was a candidate for re-election for purposes of §106.15(3). It is not alleged that the information provided was not true or of legitimate interest to the employer. The substance of the allegation appears to be that Rep. Kreegel's actions were motivated by his electoral interests, although they appear to be otherwise lawful. It is therefore my conclusion that paragraph 3.a. of the complaint may allege facts

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<sup>1</sup> "A candidate may not, in the furtherance of his or her candidacy for nomination or election to public office in any election, use the services of any state, county, municipal, or district officer or employee during working hours."

sufficient to constitute a violation under the jurisdiction of the House and that the complaint is not de minimis.

Pursuant to Rule 16.2(b)(4)d., based on my analysis of the complaint, it is my duty to transmit a copy of the complaint to you and, with respect to paragraph 3.a. of the complaint, request the appointment of a Probable Cause Panel or Special Investigator to carry out the responsibilities assigned thereto in Rule 16.2.

Respectfully,

A handwritten signature in black ink, appearing to read "D. Rivera", with a horizontal line drawn through the bottom of the signature.

David Rivera  
Chairman

Attachments

cc: ~~Rep. Paige Kreegel~~  
Robert J. Anderson, Complainant