

COMPLAINT

The Commission's records and proceedings in a case are confidential until the Commission rules on probable cause. A copy of the complaint will be provided to the person against whom it is brought.

1. PERSON BRINGING COMPLAINT:

Name: Stephanie Kienzle Work Phone: (____) _____
Address: 7535 SW 26 Court Home Phone: (____) 305 335-2093
City: Davie County: Broward State: FL Zip Code: 33314

2. PERSON AGAINST WHOM COMPLAINT IS BROUGHT:

If you intend to name more than one individual or entity, please file multiple complaints. A person can be an individual, political committee, political party, electioneering communication organization, club, corporation, partnership, company, association, or other type of organization.

Name of individual or entity: Linda Joseph, a/k/a Linda Joseph Noel
Address: 17071 W Dixie Hwy Apt 516 Phone: (____) 305 632-9442
City: North Miami Beach County: Miami-Dade State: FL Zip Code: 33160

If individual is a candidate, list the office or position sought: _____

Have you filed this complaint with the State Attorney's Office? (check one) ☐ Yes ☒ No

Are you alleging a violation of Section 104.271(2), F.S.? (check one) ☐ Yes ☒ No

Are you alleging a violation of Section 104.2715, F.S.? (check one) ☐ Yes ☒ No

3. ALLEGED VIOLATION(S):

Please attach a **concise** narrative statement in which you list the provisions of the Florida Election Code that you believe the person named above may have violated. The Commission has jurisdiction only to investigate provisions of Chapter 104 and Chapter 106, Florida Statutes. Please include the following items as part of your attached statement:

- The facts and actions that you believe support the violations you allege;
- The names/telephone numbers of persons whom you believe may be witnesses to the facts;
- A copy or picture of any political advertisement(s) you mention in your statement;
- A copy of each document you mention in your statement;
- An explanation of why you believe information you reference from websites is relevant; and
- Any other evidence supporting your allegations.

SEE REVERSE SIDE OF DOCUMENT FOR ADDITIONAL INFORMATION

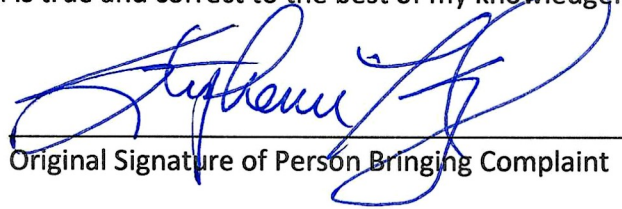
Any person who files a complaint while knowing that the allegations are false or without merit commits a misdemeanor of the first degree, punishable as provided in Sections 775.082 and 775.083, Florida Statutes.

FLORIDA ELECTIONS COMMISSION
107 West Gaines Street, Suite 224, Tallahassee, FL 32399-1050

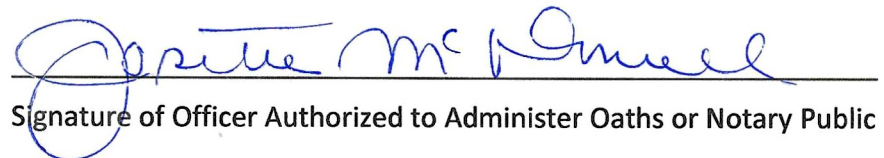
4. **OATH:**

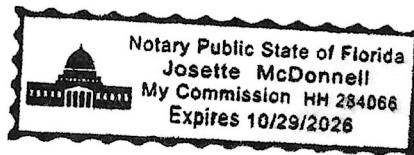
STATE OF FLORIDA
COUNTY OF Broward

I swear or affirm that the above information is true and correct to the best of my knowledge.


Original Signature of Person Bringing Complaint

Sworn to and subscribed before me this 13 day of
August, 20 26


Signature of Officer Authorized to Administer Oaths or Notary Public



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

Personally Known ☒ Or Produced Identification ☐

Type of Identification Produced _____

5. **IMPROPERLY COMPLETED COMPLAINT FORMS MAY BE RETURNED:**

- You **MUST** submit this completed complaint form in order to file a complaint.
- You **MUST** complete **ALL FOUR** of the above sections of this form. **DO NOT** leave any blanks.
- You **MUST** submit the **ORIGINAL** complaint form. Copied/faxed/emailed forms are returned.
- Each complaint can only be filed against **ONE PERSON** or **ENTITY**. If you wish to file against multiple parties, you **MUST** submit a complaint form **for each party** you wish to file against.
- **DO NOT** submit multiple complaint forms with one set of attachments applying to multiple complaints. You **MUST** attach **copies** of attachments to **each complaint** to which they apply.
- **MAKE SURE** the alleged violation(s) of **Chapters 104 or 106** occurred within the last **2 years**.
- **MAKE SURE** your complaint is **sworn** and there is **no defect** to the **notarization** in Section 4.

COMPLAINT AGAINST NORTH MIAMI BEACH COMMISSION CANDIDATE LINDA JOSEPH NOEL

Linda Joseph Noel filed to run for a seat on the North Miami Beach Commission on February 6, 2026.

Linda Joseph Noel filed the attached Campaign Treasurer's Report on August 7, 2026 with the City Clerk's Office for the City of North Miami Beach.

One of the Itemized Expenditures the candidate report was for a payment made on July 31, 2026 to the Florida League of Cities in the amount of \$1,825.00, with a Purpose of "Annual conference registration for candidate and adult guest."

It is this complainant's belief that such expenditure is impermissible for a municipal campaign and in violation of Florida Statute 106.1405, in that this is a personal expense.

For one thing, a **non-incumbent municipal candidate** has no official city business at the Florida League of Cities annual conference.

Furthermore, based on Florida campaign finance law, a **non-incumbent municipal candidate** using campaign funds to pay for an **"adult guest" to attend a conference is a clear violation of state law.**

Even if this candidate's expense to register for the annual conference is a legitimate campaign expense, the expense for an "adult guest" does not appear to be an allowable expense under Florida law.

CAMPAIGN TREASURER'S REPORT SUMMARY

(1) Linda Joseph Noel Name _____ (2) 17071 W Dixie Hwy Apt 516 Address (number and street) _____ North Miami Beach, FL 33160 City, State, Zip Code _____ ☐ Check here if address has changed	OFFICE USE ONLY CITY CLERK'S OFFICE '26 AUG 07 PM5:23 (3) ID Number: _____														
(4) Check appropriate box(es): ☒ Candidate Office Sought: North Miami Beach City Commissioner Group 4 ☐ Political Committee (PC) ☐ Electioneering Communications Org. (ECO) ☐ Check here if PC or ECO has disbanded ☐ Party Executive Committee (PTY) ☐ Check here if PTY has disbanded															
(5) Report Identifiers Cover Period: Fr 07 / 18 / 26 07 / 31 / 26 26P5 ☒ Original ☐ Amendment ☐ Special Election Report															
(6) Contributions This Report <table style="width: 100%;"> <tr> <td>Cash & Checks</td> <td style="text-align: right;">\$0.00</td> </tr> <tr> <td>Loans</td> <td style="text-align: right;">\$2,700.00</td> </tr> <tr> <td>Total Monetary</td> <td style="text-align: right;">\$2,700.00</td> </tr> <tr> <td>In-Kind</td> <td style="text-align: right;">\$0.00</td> </tr> </table>	Cash & Checks	\$0.00	Loans	\$2,700.00	Total Monetary	\$2,700.00	In-Kind	\$0.00	(7) Expenditures This Report <table style="width: 100%;"> <tr> <td>Monetary Expenditures</td> <td style="text-align: right;">\$4,525.00</td> </tr> <tr> <td>Transfers to Office Acct</td> <td style="text-align: right;">\$0.00</td> </tr> <tr> <td>Total Monetary</td> <td style="text-align: right;">\$4,525.00</td> </tr> </table>	Monetary Expenditures	\$4,525.00	Transfers to Office Acct	\$0.00	Total Monetary	\$4,525.00
Cash & Checks	\$0.00														
Loans	\$2,700.00														
Total Monetary	\$2,700.00														
In-Kind	\$0.00														
Monetary Expenditures	\$4,525.00														
Transfers to Office Acct	\$0.00														
Total Monetary	\$4,525.00														
(8) Other Distributions \$0.00															
(9) TOTAL Monetary Contributions To Date \$ \$34,725.00	(10) TOTAL Monetary Expenditures To Date \$ \$4,670.20														
(11) Certification It is a first degree misdemeanor for any person to falsify a public record (ss. 839.13, F.S.) I certify that I have examined this report and it is true, correct, and complete: <table style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> (Type name) <u>Linda Joseph Noel</u> ☐ Individual (only for IE or electioneering comm.) ☒ Treasurer ☐ Deputy Treasurer </td> <td style="width: 50%; vertical-align: top;"> (Type name) <u>Linda Joseph Noel</u> ☒ Candidate ☐ Chairperson (only for PC and PTY) </td> </tr> </table> <table style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: bottom;"> X _____ Signature </td> <td style="width: 50%; vertical-align: bottom;"> X _____ Signature </td> </tr> </table>		(Type name) <u>Linda Joseph Noel</u> ☐ Individual (only for IE or electioneering comm.) ☒ Treasurer ☐ Deputy Treasurer	(Type name) <u>Linda Joseph Noel</u> ☒ Candidate ☐ Chairperson (only for PC and PTY)	X _____ Signature	X _____ Signature										
(Type name) <u>Linda Joseph Noel</u> ☐ Individual (only for IE or electioneering comm.) ☒ Treasurer ☐ Deputy Treasurer	(Type name) <u>Linda Joseph Noel</u> ☒ Candidate ☐ Chairperson (only for PC and PTY)														
X _____ Signature	X _____ Signature														

CAMPAIGN TREASURER'S REPORT – ITEMIZED CONTRIBUTIONS

(1) Name Linda Joseph Noel (2) I.D. Number _____

(3) Cover Period 07/18/26 through 07/31/26 (4) Page 1 of 1

(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Contributor Type Occupation		(9) Contribution Type	(10) In-kind Description	(11) Amendment	(12) Amount
(6) Sequence Number		Type	Occupation	Type	Description		
07/31/26	Linda Joseph Noel 17071 W Dixie Hwy Apt 516 North Miami Beach, FL 33160	S	Candidate	LOA			\$2,700.00
1							
/ /							
/ /							
/ /							
/ /							
/ /							
/ /							

DS-DE 13 (Rev. 11/13)

SEE REVERSE FOR INSTRUCTIONS AND CODE VALUES

CITY CLERK'S OFFICE
'26 AUG 07 PM5:23

CAMPAIGN TREASURER'S REPORT – ITEMIZED EXPENDITURES

(1) Name Linda Joseph Noel

(2) I.D. Number _____

(3) Cover Period 07/18/26 through 07/31/26

(4) Page 1 of 1

(5) Date	(7) Full Name (Last, Suffix, First, Middle) Street Address & City, State, Zip Code	(8) Purpose (add office sought if contribution to a candidate)	(9) Expenditure Type	(10) Amendment	(11) Amount
07/30/26 1	Blueprint Consulting LLC 936 SW 1st Ave, Suite 980 Miami, FL 33130	Campaign marketing materials and photography	MON		\$2,700.00
07/31/26 2	Florida League of Cities 301 S. Bronough St., Suite 300 Tallahassee, FL 32301	Annual conference registration for candidate and adult guest	MON		\$1,825.00
//					
//					
//					
//					
//					