



THE SCHOOL DISTRICT OF  
PALM BEACH COUNTY, FLORIDA

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## MEMORANDUM

**TO:** Honorable Chair and Members of the School Board  
Dr. Donald E. Fennoy, Superintendent  
Chair and Members of the Audit Committee

**FROM:** Teresa Michael, Inspector General 

**DATE:** December 1, 2020

**SUBJECT:** Transmittal of Final Investigative Report: *Palm Beach Maritime Academy Case #20-0008-1 Conflict of Interest*

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In accordance with School Board Policy 1.092 we hereby transmit the above-referenced final report.

The report addresses the following allegation(s):

1. Palm Beach Maritime Academy (PBMA) Board Member Richard Scott Shelley did not disclose to the PBMA Board Members that he is the Board Chairperson for Blueline 360, Inc. and Apollo Advisory Inc., who provides marketing services for Blueline 360, prior to PBMA Board Members awarding Blueline 360 a service contract. ***Unsubstantiated.***
2. Palm Beach Maritime Academy (PBMA) service provider Daniel Rishavy is the owner of Edu-Link Inc. who inappropriately received 14 payments between February 3, 2014, and June 24, 2014, totaling \$188,000 and Mr. Rishavy was the signatory for the payments. ***Unsubstantiated.***

The report is finalized and will be posted on the Inspector General's website;  
[https://www.palmbeachschools.org/about\\_us/reports\\_and\\_publications/inspector\\_general\\_reports](https://www.palmbeachschools.org/about_us/reports_and_publications/inspector_general_reports).

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**INTRODUCTION & SYNOPSIS**

On December 10, 2019, the OIG received an anonymous complaint alleging that Palm Beach Maritime Academy (PBMA) Board Member Richard Scott Shelley did not disclose his affiliation as the Board Chairperson of Blueline 360, Inc. prior to the PBMA Board awarding Blueline 360 a service contract. Additionally, it was alleged that Mr. Shelley is the owner of Apollo Advisory Inc. who provides marketing services for Blueline 360, Inc.

The complainant also alleged that PBMA service provider Daniel Rishavy is the owner of Edu-Link Inc., who inappropriately received 14 payments between February 3, 2014, and June 24, 2014, totaling \$188,000, and Mr. Rishavy was the signatory for the payments.

1. Palm Beach Maritime Academy (PBMA) Board Member Richard Scott Shelley did not disclose to the PBMA Board Members that he is the Board Chairperson for Blueline 360, Inc. and Apollo Advisory Inc., who provides marketing services for Blueline 360, prior to PBMA Board Members awarding Blueline 360 a service contract.

*Per Florida Statute 1002.33(9)(5) Students and Parental Rights and Educational Choices-Charter Schools.*

*(9) Charter School Requirements*

- (5) "Participating in governance training approved by the department which must include government in the sunshine, conflicts of interest, ethics, and financial responsibility."*

*Per contractual agreement, Palm Beach County School District and Palm Beach Maritime Academy page-61, section (9)*

*(9) Governing Board Compensation*

*"No member of the Governing Board shall receive compensation, directly or indirectly, from the schools operation, including but not limited to grant funds."*

*Per Amended and Restated Palm Beach Maritime Academy BYLAWS, Article V (5.9.)*

*(5.9.) Board Member Training and Professional Development*

*"The board will schedule annual governance training in accordance with Rule 6A-6.0874, Florida Administrative Code, as may be amended from time to time. Topics to be covered as specified in Section 1002.33(9)(k), Florida Statutes, will include: Conflicts of Interest, Models of Governance and leadership, Charter School Law*

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*in Florida, Ethics, Basic Understanding of Parliamentary Procedures, Government in Sunshine Law, Financial Responsibility, Guided Questions for mission Statement and Strategic Planning and Drafting policies. Measurable learning objectives that specify the performance required, Description of instructional strategies, activities and presentation material, Methods to be used to measure the stated learning objectives, overall training performance. Each board member will receive a comprehensive binder containing copies of the Board Bylaws, charter contract, management agreement, minutes for the previous year, contract information and other pertinent information. New board members shall be required to complete 4 hour required governance training, and the refresher training, in accordance with State requirements in order to maintain their membership in the Board. Non-compliance with these requirements within the time period required by law or charter contract shall result in their removal from the Board without further action required by the Board. The Board shall maintain a schedule of governance training for all members, which shall be updated and published monthly. The Board shall provide in its annual budget, for funding for Board Members to attend professional development, and attendance to the Annual Charter School Conference, in accordance with provisions voted upon annually and provided in the annual budget.”*

2. Palm Beach Maritime Academy (PBMA) service provider Daniel Rishavy is the owner of Edu-Link Inc. who inappropriately received 14 payments between February 3, 2014, and June 24, 2014, totaling \$188,000 and Mr. Rishavy was the signatory for the payments.

*Per Amended and Restated Palm Beach Maritime Academy BYLAWS, Article IX (9.2.)*

*(9.2.) Checks, Drafts, Orders of Payment*

*“All checks, drafts or orders of payment of money, notes, or other evidences of indebtedness issued in the name of the Corporation shall be signed by such officers or officers, agent, or agents of the Corporations and in such manner as the Board of Directors from time to time shall determine by resolution. In the absence of such determination, such instruments shall require the signatures of both the President and the Treasurer of the Corporations.”*

The OIG investigation determined that Allegation 1 and Allegation 2 were unsubstantiated. The investigative conclusions as to each allegation will be discussed in detail later in this report.

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**OIG JURISDICTIONAL AUTHORITY**

*School Board Policy 1.092* provides for the Inspector General to receive and consider complaints, and conduct, supervise, or coordinate such inquiries, investigations, or reviews, as the Inspector General deems appropriate.

**BACKGROUND: INDIVIDUALS & ENTITIES COVERED IN THIS REPORT**

***Palm Beach Maritime Academy (PBMA)***

John Grant founded the Palm Beach Maritime Museum, Inc. in 1974. The Florida not-for-profit organization was established to operate a public charter school, Palm Beach Maritime Academy (PBMA). The Charter School contract with the Palm Beach County School Board commenced on July 1, 2014, ending on June 30, 2019. A contract renewal between Palm Beach County School Board and Palm Beach Maritime Academy began on July 1, 2019, and ends on June 30, 2029.<sup>1</sup>

PBMA operates two charter schools: An elementary school located at 1518 West Lantana Road, Lantana, FL 33462, with a total enrollment of 580, with an 11:1 Student-Teacher Ratio. The school serves elementary school students from K-5.

PBMA's secondary school is a middle/high school located at 600 South East Coast Avenue, Lantana, FL 33462. Total enrollment is 582, and an 11:1 Student-Teacher Ratio, serving students for grades 6-12.<sup>2</sup>

***ASR Alert System, Active Shooter Response.***

The ASR active alert system is a wireless alert system that utilizes a combination of text alerts, email alerts, with localized strobe/alarm alerts to provide timely information and ample warning to personnel (local law enforcement) of an active shooter incident.<sup>3</sup>

***Blueline 360, Inc.***

A Florida profit corporation registered with Department of State, Division of Corporations on December 18, 2018. The Incorporator is Dereck Ogden, the Directors are James R. Billig, Paul G. Murray, and Dereck W. Ogden with a Principal address of 11718 Southeast Federal Highway #216, Hobe Sound, FL 33455.<sup>4</sup> Blueline 360 Inc. is an integration and consulting company that

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<sup>1</sup> Florida Charter School Contract between the School Board of Palm Beach County and the Palm Beach Maritime Academy

<sup>2</sup> [www.palmbeachschools.org](http://www.palmbeachschools.org)

<sup>3</sup> [www.asralertsystems.com/ASR Alert System \(Active Shooter Response\)](http://www.asralertsystems.com/ASR%20Alert%20System%20(Active%20Shooter%20Response))

<sup>4</sup> [www.SunBiz.org](http://www.SunBiz.org) – BlueLine360



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offers risk assessment services, training, security, and safety products to clients through their authorized dealers and distributors.<sup>5</sup>

***Apollo Advisory, Inc.***

A Florida profit corporation was registered with Department of State, Division of Corporations on March 13, 2009 by Spiegel & Utrera, P.A. from 2009 through 2010. Richard Scott Shelley became the sole Incorporator and Director on February 16, 2010, through April 29, 2019. The principal address is 1302 Southwest Evergreen Lane, Palm City, FL 34990. Financial Industry Regulation Authority (FINRA) Apollo Advisory Inc. provides marketing advice for active threat security technology to schools, churches, hospitals, and law enforcement agencies.<sup>6</sup>

In a November 18, 2020, email response Mr. Shelley described Apollo Advisory Inc., as “*Apollo Advisory Provide (non-securities/non-investment) financial advice as it relates to managing financial risk, advising on insurance, partnership structures, customer and vendor contracts, identifying ways to increase the profitability and reduce the tax liability of a business. This include advice on marketing strategies but Apollo does not provide marketing services. The mandated FINRA disclosure of this outside business activity may have been interpreted as activities of Apollo but in reality, it was meant to be a description of what Blueline 360 does not what Apollo does. The disclosures intent is to clarify that the nature of the outside business activity does not involve securities (private or public) and does not involve raising monies for investors,*” (**Exhibit 12**).

***Edu-Link, LLC.***

A Florida Limited Liability Company registered with the Department of State, Division of Corporations on July 9, 2012. The managing members were the Educare Project and Development, LLC and Link-Up, Inc. The Educare and Project Development’s LLC principal address was 4747 Hollywood Blvd #101-146 Hollywood, FL. 33021. The Link-Up Inc. address was 2142 Northeast 122 Road, North Miami, FL 33181. On April 30, 2014, Link-Up Inc’s. address was changed to 7617 Southern Brook Bend, Unit #303, Tampa, FL 33635. On June 16, 2014, Daniel Rishavy withdrew Educare Project and Development, LLC as a managing member of Edu-Link Inc. On September 25, 2015, Daniel Rishavy filed an Administrative Dissolution for the Edu-Link, Inc.<sup>7</sup>

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<sup>5</sup> [www.BlueLine360.net](http://www.BlueLine360.net)

<sup>6</sup> FINRA & [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov), Richard Scott Shelley Investment Adviser Representative Disclosure Report

<sup>7</sup> [www.Sunbiz.org](http://www.Sunbiz.org) – Edu-Link, Inc.

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***Link-Up, Inc.***

Maria Regina Faya-Rishavy registered Link-Up Inc. with the Department of State, Division of Corporations on May 1, 1995, as the Incorporator. Daniel Rishavy was added as a Co-Incorporator on April 5, 2000. Maria Regina Faya-Rishavy was removed as the Incorporator in 2002. Daniel Rishavy was listed as the sole Incorporator and Director from December 2, 2002, through January 16, 2020. The Principal address listed is 11093 Harbour Springs Circle, Boca-Raton, FL 33428.<sup>8</sup> Link-Up Inc. specializes in back-office financial management, administrative support services, employee benefits, financial statements preparation, projections, preparations of budgets, accounts payable, and state reporting.

***FINRA, Financial Industry Regulatory Authority, Inc.***

A government-authorized not-for-profit organization that oversees U.S. broker dealers, and provides information about current and former registered securities firms.

**The OIG interviewed the following Palm Beach Maritime Academy Staff members during the investigation:**

***Andrew Binns, Board Chair, Palm Beach Maritime Academy***

Mr. Binns has been a Palm Beach Maritime Academy Board Member since 2015.

***Cesare Reno Boffice, Principal, Palm Beach Maritime Academy***

Principal at Palm Beach Maritime Academy since 2013.

***Shari Cooper, Parent Liaison, Palm Beach Maritime Academy***

Parent Liaison at Palm Beach Maritime Academy since 2012.

***David Jackson, Board Member Palm Beach Maritime Academy***

PBMA Board member since March 27, 2020.

***Judy Lehman, Former Board Member, Palm Beach Maritime Academy***

Ms. Lehman has been a Board Member at Palm Beach Maritime Academy from March 2015 to March 2019.

***DeeEtte Naukana, Board Member, Palm Beach Maritime Academy***

PBMA Board Member since March 26, 2020.

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***Daniel Rishavy, Contractor, Palm Beach Maritime Academy, Owner of Link-Up Incorporated.***

Owner of Link-Up Incorporated, located at 11093 Harbour Springs Circle, Boca-Raton, FL 33428<sup>9</sup>. Chief Financial Officer at PBMA John Grant Foundation from 2012-2014. Currently, he is a contractor at the PBMA schools who provides back-office financial management services.

***Richard Scott Shelley, Palm Beach Maritime Academy Board Member, Owner of RSM-Financial Risk Management LLC and Apollo Advisory Inc.***

Licensed Broker and owner of RSM Financial Risk Management and Apollo Advisory Inc., located at 1302 Southwest Evergreen Lane, Palm City, FL 34990.<sup>10</sup> Palm Beach Maritime Academy Board Member since 2014.

***Marie Turchiaro, Executive Director, Palm Beach Maritime Academy***

Executive Director at Palm Beach Maritime Academy (PBMA) since 2000.

**RELEVANT GOVERNING AUTHORITIES**

- Florida Statutes 1002.33(9), Charter Schools
- Florida Administrative Code 6A-6.0874(b) Approval of Charter School Governance Training
- School District Charter School Contract Between the School Board of Palm Beach County and Palm Beach Maritime Academy, Page 61, section #9
- Palm Beach Maritime Academy AMENDED and RESTATED BYLAWS

**DOCUMENTS REVIEWED**

- Florida Secretary of State, Division of Corporations Documents on Sunbiz.Org – Edu-Link LLC. Educare Project and Development, LLC. Link-Up Inc., RSM Financial Risk Management, Apollo Advisory Inc., and Blueline 360 Inc.
- February 20, 2019, PBMA Board Meeting Agenda Minutes.
- February 20, 2019, PBMA audio Board Meeting discussions.
- PBMA Charter Agreement Contract with the Palm Beach County School District.
- PBMA Contract with Contractor Daniel Rishavy.
- Central Registration Depository (CRD) webpage.
- Investment Adviser Representative Public Disclosure Report (IAPD) webpage.
- Financial Industry Regulatory Authority, Inc. (FINRA) webpage.
- ASR Alert Systems Website ([www.asralertsystem.com](http://www.asralertsystem.com)).

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<sup>9</sup> [www.Sunbiz.org](http://www.Sunbiz.org) – Link-Up Inc.

<sup>10</sup> [www.Sunbiz.org](http://www.Sunbiz.org) RSM-Financial Risk Management, Apollo Advisory Inc.

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**CASE INITIATION & INVESTIGATIVE METHODOLOGY**

The investigation was based on an anonymous complaint alleging PBMA Board Member Richard Scott Shelley did not disclose that he is the Board Chairperson for Blueline 360, Inc. and Apollo Advisory Inc., to PBMA Board Members prior to PBMA Board Members awarding Blueline 360 Inc., a service contract.

This investigation was conducted in compliance with the *Quality Standards for Investigations, Principles and Standards for Offices of Inspector General*, promulgated by the Association of Inspectors General.

**INVESTIGATIVE FINDINGS<sup>11</sup>**

- 1. Palm Beach Maritime Academy (PBMA) Board Member Richard Scott Shelley did not disclose to the PBMA Board Members that he is the Board Chairperson for Blueline 360, Inc. and Apollo Advisory Inc., who provides marketing services for Blueline 360, Inc., prior to PBMA Board Members awarding Blueline 360, Inc., a service contract.**

*Per Florida Statutes 1002.33(9)(5) Students and Parental Rights and Educational Choices-Charter Schools.*

*(9) Charter School Requirements*

*(5) "Participating in governance training approved by the department which must include government in the sunshine, conflicts of interest, ethics, and financial responsibility."*

*Per contractual agreement, Palm Beach County School District and Palm Beach Maritime Academy page-61, section (9)*

*(9) Governing Board Compensation*

*"No member of the Governing Board shall receive compensation, directly or indirectly, from the schools operation, including but not limited to grant funds."*

*Per Amended and Restated Palm Beach Maritime Academy BYLAWS, Article V (5.9.)*

*(5.9.) Board Member Training and Professional Development*

*"The board will schedule annual governance training in accordance with Rule 6A-6.0874, Florida Administrative Code, as may be amended from time to time. Topics*

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<sup>11</sup> The OIG findings were determined using the standards that appear on the final page of this report.



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*to be covered as specified in Section 1002.33(9)(k), Florida Statutes, will include: Conflicts of Interest, Models of Governance and leadership, Charter School Law in Florida, Ethics, Basic Understanding of Parliamentary Procedures, Government in Sunshine Law, Financial Responsibility, Guided Questions for mission Statement and Strategic Planning and Drafting policies. Measurable learning objectives that specify the performance required, Description of instructional strategies, activities and presentation material, Methods to be used to measure the stated learning objectives, overall training performance. Each board member will receive a comprehensive binder containing copies of the Board Bylaws, charter contract, management agreement, minutes for the previous year, contract information and other pertinent information. New board members shall be required to complete 4 hour required governance training, and the refresher training, in accordance with State requirements in order to maintain their membership in the Board. Non-compliance with these requirements within the time period required by law or charter contract shall result in their removal from the Board without further action required by the Board. The Board shall maintain a schedule of governance training for all members, which shall be updated and published monthly. The Board shall provide in its annual budget, for funding for Board Members to attend professional development, and attendance to the Annual Charter School Conference, in accordance with provisions voted upon annually and provided in the annual budget."*

The OIG investigation concluded that the allegation that Palm Beach Maritime Academy (PBMA) Board Member Richard Scott Shelley did not disclose to the PBMA Board that he is the Board Chairperson for Blueline 360, Inc. and Apollo Advisory Inc. who provides marketing services for Blueline 360, Inc., prior to PBMA Board Members awarding Blueline 360, Inc., as service contract was unsubstantiated.

**The following is a recap of the witnesses' interview testimony as it relates to Allegation 1.**

*Executive Director, Marie Turchiaro:* Ms. Turchiaro stated some BYLAWS govern what board members can and cannot do. Board members cannot use their company to solicit a service contract from PBMA to gain any financial benefit(s) from PBMA. Ms. Turchiaro said she was present at the February 20, 2019, board meeting. She is familiar with the company Blueline 360, Inc. Board members voted to award a service contract to Blueline 360, Inc. to provide security services for the PBMA schools. The security system bypasses the 911 emergency system and directly contacts the Lantana Police Department to respond in a crisis. Ms. Turchiaro stated she does not know if Richard Scott Shelley holds a board position with Blueline 360, Inc. She does not know if Mr. Shelley owns a company called Apollo Advisory Inc., nor does she know if the company Apollo Advisory, Inc. provides marketing services for Blueline 360, Inc.

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*Director of Operations, Stephen Casenza:* Mr. Casenza stated PBMA does have BYLAWS that governs what board members can and cannot do. He is not aware if PBMA BYLAWS prohibits board members who own companies from providing services to PBMA for personal gains. However, if a Board member owns a company, board members must disclose that information to the other board members to prevent a contract from being awarded for a personal gain.

Mr. Casenza stated he is familiar with the company Blueline 360, Inc., and that the company provides an active shooter security system for the two PBMA campuses. The security system bypasses the police communications department and directly alerts the Lantana Police Officers via text message to advise that an active shooter threat is occurring on campus. During the February 20, 2019, Board meeting, and other Board meetings, Mr. Shelley advocated strongly for Board members to approve the Blueline security system installed in the two PBMA schools. He does not know if Mr. Shelley is the Board Chairperson for Blueline 360 Inc. or if he has any other role or position within the Blueline 360 organization. He does not know if Apollo Advisory provides marketing services for Blueline 360. However, Mr. Shelley actively participated in advocating for Blueline 360 with other entities that could use the system. He recalls Mr. Shelley invited Palm Beach State College, Palm Beach County School District Officials, and a group from the Parkland Shootings to talk about the security system.

*Palm Beach Maritime Academy Board Members David Jackson and DeeEtte Naukana:* Mr. Jackson and Ms. Naukana became board members in March 2020 and did not attend board meetings during Mr. Shelley's tenure as a PBMA Board member.

*Former Palm Beach Maritime Academy Board Member Judy Lehman:* Ms. Lehman was not available to interview with the OIG. On Thursday, March 5, 2020, Ms. Lehman provided the OIG an email statement regarding Mr. Shelley's involvement with Blueline 360 Inc. The email is quoted in its entirety:

*Good Morning,*

*“To answer your question regarding any knowledge of Scott Shelley's involvement with the company handling the Active Shooter Alert System that he brought to the Palm Beach Maritime Academy after the Stoneman Douglas Shooting: The answer is no. I was not aware that Scott Shelley had any involvement with the company or with the product prior to our initial meeting to the current time. Hearing the question, I was completely unaware that the possibility even existed. After hearing the question and looking back at subsequent meetings that the Board had concerning the product, it became relevant to the issue of his demanding argument with fellow board members. During such meetings, when we were waiting for the company to address false information they had provided us and other contractual issues that arose, Scott Shelley continued to accuse board members of not wanting to keep our kids safe. On several occasion, made statements that we would have the deaths of children on our hands if we did not approve the contract. Again, he never disclosed any personal or financial involvement with the company that*

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*changed hands and names while I served on the Board of Palm Beach Maritime Academy.*

*Please do not hesitate to contact me if any further issues arise” (Exhibit 1). [sic]*

*Palm Beach Maritime Academy Board Chairperson Andy Binn:* Due to the pandemic crisis, the OIG could not make physical contact with Mr. Binns to obtain a recorded statement. On May 11, 2020, the OIG received an email statement from Mr. Binns, which was transcribed and attached to this report.

*“Scott set up an initial presentation to the Board (not sure the date). The presenter was Hector, a former Navy Seal to demonstrate the alert system...They offered us a price of \$18,000 (??) for the system installation, which the Board thought was pretty reasonable for both campuses. Shortly after that, there was turmoil in the company, and we didn't execute the contract. The company reorganized and presented again at another Board meeting in the Spring of 2019. They agreed to the original terms (they didn't like it!), and the Board approved the contract. The Lantana police were at the meeting and highly recommended the product (which is what sold the Board). The alert system was installed over the summer, 2019” (Exhibit 2). [sic]*

*Blueline 360 Incorporated owner James Billig:* On August 25, 2020, via telephone, Mr. Billig stated that PBMA Board Member Richard Scott Shelley has no affiliations with his company, nor does he hold a position within his company.

*Former Palm Beach Maritime Academy Board Member Richard Scott Shelley:* Mr. Shelley resigned from the PBMA board in March 2020. Due to the pandemic crisis, the OIG could not make physical contact with Mr. Shelley to obtain a recorded statement. On July 21, 2020, OIG received an email statement from Mr. Shelley, which was transcribed and attached to this report.

*“No, I did not personally know anyone at ASR, BL360, or James Billig when this engagement first began. A very good doctor friend of mine introduced me to one of the ASR guys and since I have no experience I felt the best thing would be to connect them with the local Lantana Police Department and put it in the hands of law enforcement to decide if it would be proposed to the Board. In August of 2018 I introduced ASR (an active threat security company) to Lantana P.D. and asked Lantana P.D. to advise the Board on the merits of the security system. Commander Haggerty of the Lantana P.D. came to a public Board meeting and recommended to the PBMA Board to incorporate the technology into the school safety strategy. The Board took the recommendation of Mr. Haggarty and unanimously voted to move forward with the security system. The next day Haggarty advised Marie Turchiaro, who then advised the Board that Lantana P.D., would welcome the technology into the department but only with the inventor of the system (James Billig ret LEO) heading the project. Lantana P.D. would not participate in the partnership if ASR was involved after learning that ASR fired James Billig, the*



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*inventor of the system the night PBMA voted to move forward. No formal contract was ever signed with ASR. The PBMA Board Director Andy Binns after speaking with James Billig and getting an understanding of the situation, made a motion to table the project and give Mr. Billig the opportunity to form his own corporation and provide the alert system to the school. Which he did with Lantana P.D.'s blessing." [sic]*

Mr. Shelley denied that he held a position within Blueline 360 during his tenure as a PBMA Board member. Mr. Shelley said he did not petition or advocate to PBMA board members on behalf of Blueline 360 to award a service contract to Blueline 360 (**Exhibit 3**).

**DOCUMENTATION REVIEWED**

On February 20, 2019, the PBMA Board Members voted to award a service contract for Blueline 360, Inc. to install an active security threat system at both PBMA schools. The security system bypasses the local police communications department and sends a text message directly to responding police officers if an active shooter is identified on school grounds. The security system was installed at both school campuses during the summer of 2019.

The OIG listened to the audio from the February 20, 2019, Board Meeting in its entirety, and focused on page 1 agenda item #4 of the meeting minutes. In attendance at the Board Meeting were the PBMA Board Members, School Operational Staffs and guests. The discussions regarding the Blueline 360 security system began at 4:24 minutes and ended at 1:33:27. At the start of the talks regarding Blueline 360, Mr. Billig talked about the security alert system. Jeff Wieball discussed the various methods to fundraise to support the security system. Board Member Judy Lehman made a motion to approve the security system's purchase, and the Board Members Andrew Binns and Richard Scott Shelley agreed to support the motion to award Blueline 360 a services contract at the PBMA schools. On March 18, 2019, the PBMA Board Members agreed to install the security alert system at the two PBMA schools.

Although Mr. Casenza and Ms. Lehman stated Mr. Shelley attempted to advocate and persuade Board Members to award a service contract to Blueline 360, the OIG found no supporting documentation to verify their statements. A review of the audio discussions indicates that Mr. Shelley did not advocate awarding a service contract to Blueline 360 or disclose PBMA Board Members that he was affiliated with Blueline 360 (**Exhibit 4**). Additionally, the PBMA Board Meeting Minutes from January 9, 2019, thru July 29, 2019, do not show that Mr. Shelly disclosed to Board Members that he was involved with Blueline 360 (**Exhibit 5**).

The OIG conducted a Broker-Check review via the internet accessing the Central Registration Depository (CRD), the Financial Industry Regulatory Authority, Inc. (FINRA) and the Investment Adviser Public Disclosure (IAPD) webpages. The webpages offered information on all current and former registered securities firms. FINRA and IAPD revealed that Mr. Shelley is the Board Chairperson for Blueline 360, Inc. and Apollo Advisory Inc., which provides marketing advice for

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active security technology to schools, churches, hospitals, and law enforcement agencies. The FINRA report disclosed a date when Mr. Shelley was affiliated with Apollo Advisory Inc., but did not disclose a date when Mr. Shelley initially became involved with Blueline 360 (**Exhibit 6**).

**CONCLUSION**

Mr. Shelley resigned from the PBMA Board in March 2020. On July 21, 2020, Mr. Shelley provided the OIG with an email response regarding his affiliations with Blueline 360 and Apollo Advisory. In response, Mr. Shelley indicated that he had no associations with Blueline 360 while serving as a PBMA Board Member. Mr. Shelley denied that Apollo Advisory Inc. provides marketing services for Blueline 360, and that Apollo Advisory Inc., is not a marketing company (**Exhibit 3**).

A review of the FINRA internet report confirms that Mr. Shelley is affiliated with Blueline 360, Inc., as a Board Chairperson. However, the FINRA webpage summaries do not indicate a date when Mr. Shelley initially became involved with Blueline 360. The OIG contacted FINRA on October 14, 2020, to request the date that their records show when Mr. Shelley became affiliated with Blueline 360 and Apollo Advisory Inc. On October 15, 2020, FINRA provided the OIG an internet response that discloses that they did not have a record to show Mr. Shelley's initial start date with Blueline 360. Regarding Apollo Advisory Inc., FINRA provided information that shows that Mr. Shelley was affiliated with Apollo Advisory Inc., since October 15, 2019 (**Exhibit 6**). James Billig, the owner of Blueline 360, said that Mr. Shelley is not affiliated with Blueline 360 and does not hold a position within the company. The Florida Division of Corporations (SunBiz.org) corroborates Mr. Billig's statement that Mr. Shelley is not a registered agent for Blueline 360. The Florida Division of Corporations shows that Mr. Shelley has been the registered agent for Apollo Advisory Inc. since March 13, 2009 (**Exhibit 7**).

Based on the documents reviewed and the testimonies obtained, the OIG determined that the allegation Palm Beach Maritime Academy (PBMA) Board Member Richard Scott Shelley did not disclose to the PBMA Board Members that he is the Board Chairperson for Blueline 360, Inc. and Apollo Advisory Inc., who provides marketing services for Blueline 360, Inc., prior to PBMA Board Members awarding Blueline 360, Inc., a service contract was **Unsubstantiated**.

- 2. Palm Beach Maritime Academy (PBMA) service provider Daniel Rishavy, is the owner of Edu-Link Inc. who inappropriately received payments between February 3, 2014, and June 24, 2014, totaling \$188,000 and Mr. Rishavy was the signatory for the payments.**

*Per Amended and Restated Palm Beach Maritime Academy BYLAWS, Article IX (9.2.)*

*(9.2.) Checks, Drafts, Orders of Payment*

SCHOOL DISTRICT OF PALM BEACH COUNTY OFFICE OF INSPECTOR GENERAL  
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*Conflict of Interest*

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*"All checks, drafts or orders of payment of money, notes, or other evidences of indebtedness issued in the name of the Corporation shall be signed by such officers or officers, agent, or agents of the Corporations and in such manner as the Board of Directors from time to time shall determine by resolution. In the absence of such determination, such instruments shall require the signatures of both the President and the Treasurer of the Corporations."*

The OIG investigation concluded that the allegation Palm Beach Maritime Academy (PBMA) service provider, and owner of Edu-Link Inc. Daniel Rishavy inappropriately received payments between February 3, 2014, and June 24, 2014, totaling \$188,000 and was the signatory for the payments was unsubstantiated.

**The following is a recap of the witnesses' interview testimony as it relates to Allegation 2.**

*Director of Operations, Stephen Casenza:* Mr. Casenza stated Daniel Rishavy was not the signatory for the payments payable to Edu-Link, LLC for back-office management services for the PBMA schools. The signatories for the payments to Edu-Link, LLC were PBMA Board Chairperson John Grant and Executive Director Marie Turchiaro.

*Executive Director Marie Turchiaro:* Ms. Turchiaro stated she does not recall Daniel Rishavy being the signatory for Edu-Link LLC payments. She (Ms. Turchiaro) and PBMA Board Chairperson John Grant were the signatories.

*Daniel Rishavy, Contractor, Owner of Link-Up Incorporated:* Due to the pandemic crisis, the OIG could not make physical contact with Mr. Rishavy to obtain a recorded statement. On July 16, 2020, OIG received an email statement from Mr. Rishavy, which is transcribed in its entirety (**Exhibit 8**).

*"Dear Mr. Sheppard,*

*In response to an allegation appearing to suggest that I used my position at Edu-Link to inappropriately direct funds to an entity controlled by me, I will swear under oath, and I know that it can be proven, that I never directed any payments to be made from any Palm Beach Maritime Academy school funds to any entity that was not authorized by the agreement described below. In fact, for the fiscal year in question, ending June 30, 2014, Edu-Link and its supporting corporations were paid approximately \$257,660 less than authorized under contract, at my direction and with my knowledge and consent as manager. Also, I do not recall being a co-signer on the checking account, although I would like to review bank records which I do not have. As I recall, Marie Turchiaro and John Grant were signatories to the account through June 30, 2014. However, I think that the central question is whether I was a co-signer, but whether I used my position to obtain funds not authorized under the services agreement. To that end, I offer the following*

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*Conflict of Interest*

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*explanations of the services provided by Edu-link and payments made under the agreement.*

*Agreement*

*Edu-Link LLC, Ink-UP, Inc (Link-up) and Educare Project and Development LLC (Educare) were jointly under an agreement with the Palm Beach Maritime Museum/dba the Palm Beach Maritime Academy (ACADEMY), to whom it jointly would provide school development and school management services.*

*Edu-Link LLC was a pass-through entity held in equal parts by Link-UP, owned by Daniel Rishavy, and Educare, owned by Patricia Aguiar. Together, Edu-Link LLC, Link-UP and Educare were all signatories to the agreement with the ACADEMY. As stated in the agreement Edu-Link's sole purpose was to support the agreement with the ACADEMY through its members. The contract required the ongoing involvement of Link-Up, Educare and their principals.*

*The agreement was for seven years, beginning July 1, 2012. It had provisions for additional 3-year renewals. Daniel Rishavy was the manager of Edu-Link, LLC. Please refer to Exhibit 1 "Edu-Link services final 2.12.12 executed contract"*

*Services are summarized on page one of the agreement, with detail provided on pages two through five.*

*The key areas of support were:*

- Financial support in budgeting, forecasting, purchasing, payroll, accounting, and reporting.*
- Assistance in the development and implementation to the ACADEMY's academic programs and student-performance-measurement systems that are research based and focus on the data-driven assessment.*
- Annual review and quarterly update of statutory and regulatory school compliance issues, and assessment of their inclusion in the school's program.*
- Create sustainable program to include the expansion of the K-8 program and the development of a high school component for the ACADEMY. The academic rigor of academic program must meet the highest standards; the maritime component is to complement the academic program and indelible, hands-on experience and inspiration through the integration of the maritime theme.*
- Marketing and enrollment responsibility to ensure the viability of the school's program.*
- The school must maintain a 3% positive fund balance on the accrual-based balance sheet, and project break-even on the revenue-expense budget before fees are due unless otherwise agreed by the governing Board.*

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*Service fees were scheduled at 9% of federal and state education funding if the school maintained a 3% unrestricted fund balance after the payment of services. The unrestricted fund balance is calculated on all annual revenues, and the service fee were based entirely upon federal and state education funding.*

*Provision of services*

*The services under the agreement were provided as required. In the execution of those services, in addition to the services provided by the Link-Up and Educare principals, Edu-Link employed two staff members who worked full time at the school, and others, engaged through Link-Up, who provided services to the school on and off-campus, and completed the high school charter application specified in the agreement. As this charter application was approved by the school district, the school was expanded to include a high school as of July 1, 2014.*

*Fee Calculation*

*Financial position of the ACADEMY for fiscal year ending June 30, 2013-14. Exhibit 2 "Audited financial position as of June 30, 2014". Pages 1 and 2.*

*The school ended the fiscal year June 30, 2014, with an unrestricted fund balance of \$515,312 against total revenues of \$8,588,410, which included \$7,678,151 of federal and state education funds.*

*Payment of service fees for fiscal-year 2013-14. Exhibit 2 "Service Fee Analysis" page 3.*

*The agreement fees of 9% of the federal and state education funds were \$691,034 for the fiscal year 2013-14. The 3% unrestricted fund balance requirement limited the earned service fees to \$615,712. I believe that jointly Edu-Link, Link-Up, and Educare were paid an approximate total \$358,052 during that year, leaving a balance at year-end of \$257, 660 not collected. To my best recollection, in a board meeting held in approximately July 2014, I told the ACADEMY board that the school ended the fiscal year with a \$515,312 and a 6% fund balance, which left an end-of-year unpaid balance to Edu-Link of \$257,660, but under the current circumstances, as manager of Edu-Link, and Link-Up, I would not seek the additional payment due because the payment structure of the bonds as issued would present*

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*financial difficulties going forward. Patricia Aguiar had resigned and had withdrawn her corporation from Edu-Link in June of 2014, and had given this notice to John Grant, Superintendent of the ACADEMY.*

*Of course, I am available to answer further questions related to this matter.  
 Best regards  
 Daniel Rishavy, CEO Link-Up, Inc." [sic]*

**DOCUMENTATION REVIEWED**

The contractual service agreement between Palm Beach Maritime Academy (PBMA) and Link-Up, Incorporated, Educare Project and Development LLC, and Edu-Link, LLC, commenced on February 21, 2012. The listed companies are Florida companies that are to provide consultative and support services to charter schools. The companies are jointly proposing services under the joint venture known as Edu-Link, LLC. Daniel Rishavy and Patricia Aguiar, who signed the service agreement on February 21, 2012, own the listed companies. The terms of the agreement are from July 1, 2012, through June 30, 2019 (**Exhibit 9**).

Mr. Casenza provided the OIG with 26 PBMA invoices/payments from July 2013 through June 2014. Of the 26 invoices, 2 invoices were reissued on another check. The payments reveal that either PBMA founder and former Board Chairperson John Grant and Executive Director Marie Turchiaro were signatories for payments to Edu-Link, LLC (**Exhibit 10**). The total funds Edu-Link, LLC received for the 2013-14 school year was \$213,588.92 (**See Table 1**).

**Figure 1 (SY 2013-14 checks payable to Edu-Link, LLC.)**

<b>Date</b>	<b>Company</b>	<b>Check#</b>	<b>Amount</b>	<b>Signatory</b>
08/02/2013	Edu-Link, LLC	9541	\$24,004.00	M. Turchiaro
08/18/2013	Edu-Link, LLC	9569	\$1,556.92	M. Turchiaro
09/03/2013	Edu-Link, LLC	9631	\$12,002.00	M. Turchiaro
11/08/2013	Edu-Link, LLC	9961	\$12,002.00	J. Grant
11/21/2013	Edu-Link, LLC	10036	\$12,002.00	J. Grant
12/04/2013	Edu-Link, LLC	10060	\$12,002.00	J. Grant
12/18/2013	Edu-Link, LLC	10118	\$12,002.00	J. Grant
01/14/2014	Edu-Link, LLC	10212	\$12,002.00	J. Grant
02/03/2014	Edu-Link, LLC	10249	\$12,002.00	J. Grant
03/06/2014	Edu-Link, LLC	10380	\$12,002.00	J. Grant
03/27/2014	Edu-Link, LLC	10462	\$12,002.00	J. Grant
04/09/2014	Edu-Link, LLC	10484	\$12,002.00	J. Grant
04/17/2014	Edu-Link, LLC	10508	\$12,002.00	J. Grant
05/02/2014	Edu-Link, LLC	10546 reissued as 10668	\$0.00	M. Turchiaro
06/04/2014	Edu-Link, LLC	10668	\$12,002.00	M. Turchiaro
05/14/2014	Edu-Link, LLC	10600 reissued as 10621	\$0.00	J. Grant
05/20/2014	Edu-Link, LLC	10621	\$12,002.00	J. Grant
06/17/2014	Edu-Link, LLC	10723	\$12,002.00	J. Grant
06/24/2014	Edu-Link, LLC	10734	\$20,000.00	J. Grant
<b>Total:</b>			<b>\$213,588.92</b>	



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**CONCLUSION:**

Mr. Casenza stated Mr. Rishavy was not a bank-authorized signatory for checks payable to Edu-Link, LLC; the authorized signatory for checks payable to Edu-Link were Mr. Grant and Ms. Tuirchiaro. Mr. Casenza provided the OIG 26 invoices payable to Edu-Link, LLC that verify Mr. Rishavy was not the signatory for checks payable to Edu-Link, LLC. Based on the documents reviewed and the testimonies obtained, the OIG determined that the allegation that Palm Beach Maritime Academy (PBMA) service provider and owner of Edu-Link Inc., Daniel Rishavy, inappropriately received payments between February 3, 2014, and June 24, 2014, totaling \$188,000 and was the signatory for the payments was **unsubstantiated**.

**AFFECTED PARTY NOTICE**

In accordance with *School Board Policy 1.092 (8)(b)(iv)*, on November 13, 2020 Mr. Richard Scott Shelley and Daniel Rishavy were notified of the investigative conclusions and provided with an opportunity to submit a written response to these conclusions. On November 13, 2020, Mr. Rishavy provided the OIG an email response. The email response stated, "I have read fully the OIG report for case number 20-0008-1 and have no further comments" (**Exhibit 11**). On November 18, 2020, Mr. Shelley provided the OIG an email response, which is transcribed in its entirety, (**Exhibit 12**).

*"I'm reaching out to clarify some inaccuracies in relation to the description of Apollo Advisory within your report. I would appreciate it if you would make the following corrections prior to finalizing the report.*

*Apollo Advisory Inc. is a financial company. It provides "advice" only. It is not a marketing company as described in your report nor has it ever marketed anything. The purpose of the entity is to provide (non-securities/non-investment) financial advice as it relates to managing financial risks, advising on insurance, partnership structures, customer and vendor contracts, identifying ways to increase the profitability and reduce the tax liability of a business. This may include advice on marketing strategies but Apollo does not provide marketing services.*

*The mandated FINRA disclosure of this outside business activity may have been misrepresented as activities of Apollo but in reality, it was meant to be a description of what Blueline 360 does not what Apollo does. The disclosures intent is to clarify that the nature of the outside business activity does not involve securities (private or public) and does not involve raising monies from investors.*

*Additionally, I would like to also have the record reflect that the Advisory Board for Blueline 360 was a voluntary, non-compensated group of primarily retired law enforcement agents and myself established to brainstorm business growth ideas and strategies that the Principles of Blueline 360, could if they chose to, implement*



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*into their business. The focus was to provide ideas on how best to educate and bring schools, municipalities, law enforcement agencies and communities.*

*Other than those issues, I am pleased with the accurate conclusion of your report. I took my time on the Board of PBMA very seriously and it was extremely important to me personally that it had a positive impact on the school. During my time on the Board I believe I was instrumental in keeping the school from going out of business due to a very poorly structured debt deal put in place by former leadership and I participated in seeing technology and a partnership with Lantana PD incorporated into the campuses that has made PBMA one of the safest schools in the country for both our students to learn in, as well as our teachers and staff to work at. I make no apologies for my passion on these issues and I am very proud of the accomplishments the Board I sat on made.*

*Scott Shelley, [sic]"*

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Palm Beach County School Board Members  
Donald E. Fennoy II, Superintendent  
Audit Committee Members  
Palm Beach Maritime Academy Board Members  
OIG File

SCHOOL DISTRICT OF PALM BEACH COUNTY OFFICE OF INSPECTOR GENERAL  
OIG DRAFT REPORT OF INVESTIGATION

*Conflict of Interest*

**Investigation Conducted by:**

Robert Sheppard, CIGI, Senior Investigator

  
\_\_\_\_\_  
11/30/20  
Date

**Investigation Supervised by:**

Oscar Restrepo, CIG, CIGI, Director of Investigations

  
\_\_\_\_\_  
11/30/20  
Date

**Investigation Approved by:**

Teresa Michael, CIG, CIGI, CFE, Inspector General

  
\_\_\_\_\_  
11/30/2020  
Date

*The evidentiary standard used by the School District of Palm Beach County OIG in determining whether the facts and claims asserted in the complaint were proven or disproven is based upon the preponderance of the evidence. Preponderance of the evidence is contrasted with “beyond a reasonable doubt,” which is the more severe test required to convict a criminal and “clear and convincing evidence,” a standard describing proof of a matter established to be substantially more likely than not to be true. OIG investigative findings classified as “substantiated” means there was sufficient evidence to justify a reasonable conclusion that the actions occurred and there was a violation of law, policy, rule, or contract to support the allegation. Investigative findings classified as “unfounded” means sufficient evidence to justify a reasonable conclusion that the actions did not occur and there was no violation of law, policy, rule, or contract to substantiate the allegation. Investigative findings classified as “unsubstantiated” means there was insufficient evidence to justify a reasonable conclusion that the actions did or did not occur and a violation of law, policy, rule, or contract to support the allegation could not be proven or disproven.*

Exhibit #1

March 5, 2020 Email Response

From

Former PBMA Board Member

Judy Lehman



Robert Sheppard <robert.sheppard@palmbeachschools.org>

## Meeting

2 messages

**Robert Sheppard** <robert.sheppard@palmbeachschools.org>

Thu, Mar 5, 2020 at 10:01 AM

To: Judy Lehman <judy.lehman@palmbeachschools.org>

Good morning Judy,

When you have a moment, would you please give me a return call at PX#46877 or (561) 649-6877...

Robert L. Sheppard, Jr.  
Auditor/Investigator SRI  
Office of Inspector General  
3138 Forest Hill Blvd., Suite C-306  
West Palm Bch, FL 33406  
Phone: (561) 649-6877  
PX# 46877  
Email: [Robert.Sheppard@palmbeachschools.org](mailto:Robert.Sheppard@palmbeachschools.org)

**Judy Lehman** <judy.lehman@palmbeachschools.org>

Thu, Mar 5, 2020 at 10:56 AM

To: Robert Sheppard <robert.sheppard@palmbeachschools.org>

Good Morning,

To answer your question regarding any knowledge of Scott Shelley's involvement with the company handling the Active Shooter Alert System that he brought to the Palm Beach Maritime Academy after the Stoneman Douglas Shooting: The answer is no. I was not aware that Scott Shelley had any involvement with the company or with the product prior to our initial meeting to the current time. Hearing the question, I was completely unaware that the possibility even existed. After hearing the question and looking back at subsequent meetings that the Board had concerning the product, it became relevant to the issue of his demanding argument with fellow board members. During such meetings when we were waiting for the company to address false information they had provided us and other contractual issues that arose, Scott Shelley continued to accuse board members of not wanting to keep our kids safe. On several occasions made statements that we would have the deaths of children on our hands if we did not approve the contract. Again, he never disclosed any personal or financial involvement with the company that changed hands and names while I served on the Board of Palm Beach Maritime Academy.

Please do not hesitate to contact me if any further issues arise.

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Exhibit #2

March 11, 2020 Email Response

From

PBMA Board Member

Andy Binns



If further information is needed please do not hesitate to contact me at (561) 633-8922 or [Robert.Sheppard@palmbeachschools.org](mailto:Robert.Sheppard@palmbeachschools.org)

1. Did PBMA board members award a contract to contractor Dan Rishavy who owns/owned Edu-Links in 2014, Inc. (What services does Edu-Link Inc. provide?) What was the contract worth and contract terms....Can you provide documents....

This is before I was on the Board. Steve Cazenza may have the documents with the terms/amounts... This was when John Grant was running the operation.

2. During PBMA board meetings or at other events did Scott Shelley petition to award Daniel Rishavy's company (Edu-Link) service contract(s) for PBMA?

Dan had been with PBMA as either a contractor or employee since I got on the Board. The Board had a contract with Edu-Link... Scott wasn't pushing it, as it was an ongoing contract/relationship with Dan.

3. During board meetings or at any other times did Scott Shelley petition/advocate to have PBMA award a service contract(s) for BlueLine 360, Inc.?

Scott set up an initial presentation to the Board (not sure the date). The presenter was Hector, a former Navy Seal, to demonstrate the alert system.... They offered us a price of \$18,000 (??) for the system installation, which the Board thought was pretty reasonable for both campuses. Shortly thereafter, there was turmoil in the company and we didn't execute the contract. The company reorganized and presented again at another Board meeting in the Spring of 2019. They agreed to the original terms (they didn't like it!) and the Board approved the contract. The Lantana police were at the meeting and highly recommended the product (which is what sold the Board). The alert system was installed over the summer, 2019

4. Were board members aware that Scott Shelley was the Board Chairman or a representative for BlueLine 360, Inc.? **This I have never heard**

5. Were board members aware that Scott Shelley owned Apollo Advisory, Inc.? (What services for Apollo Advisory Inc. provide)...**I have never heard of this company**

Andy Binns, Ed.D.

5/11/20

Looking forward to hearing from you..Stay Safe!!

Robert L. Sheppard, Jr.  
Auditor/Investigator SRI  
Office of Inspector General  
[3138 Forest Hill Blvd., Suite C-306](#)  
West Palm Bch, FL 33406  
Phone: (561) 649-6877  
PX# 46877  
Email: [Robert.Sheppard@palmbeachschools.org](mailto:Robert.Sheppard@palmbeachschools.org)

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**Robert Sheppard** <robert.sheppard@palmbeachschools.org>  
To: Andy Binns <andy.binns@gmail.com>

Mon, May 11, 2020 at 2:18 PM

On Mon, May 11, 2020 at 1:53 PM Andy Binns <andy.binns@gmail.com> wrote:

Thank you Sir!!!

[Quoted text hidden]

5/11/20

[Quoted text hidden]

--  
Robert L. Sheppard, Jr.  
Auditor/Investigator SRI  
Office of Inspector General  
3138 Forest Hill Blvd., Suite C-306  
West Palm Bch, FL 33406

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**Andy Binns** <andy.binns@gmail.com>  
To: Robert Sheppard <robert.sheppard@palmbeachschools.org>

Tue, May 12, 2020 at 10:53 AM

just thinking... Do you have an evidence that Scott Shelley was on the Board of BlueLine, 360??? He is not listed on Sunbiz

Andy

[Quoted text hidden]

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**Robert Sheppard** <robert.sheppard@palmbeachschools.org>  
To: Andy Binns <andy.binns@gmail.com>

Tue, May 12, 2020 at 11:05 AM

Good morning Andy,

I am aware of the "sunbiz.org" records regarding blueLine360.....respectfully at this time I can not disclose any information regarding Mr. Shelley..

Robert L. Sheppard, Jr.  
Auditor/Investigator SRI  
Office of Inspector General  
3138 Forest Hill Blvd., Suite C-306  
West Palm Bch, FL 33406  
Phone: (561) 648-6877  
PX# 46877  
Email: [Robert.Sheppard@palmbeachschools.org](mailto:Robert.Sheppard@palmbeachschools.org)

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**Andy Binns** <andy.binns@gmail.com>  
To: Robert Sheppard <robert.sheppard@palmbeachschools.org>

Tue, May 12, 2020 at 11:35 AM

no problem... I was just pondering!

[Quoted text hidden]

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**Robert Sheppard** <robert.sheppard@palmbeachschools.org>  
Draft To: Andy Binns <andy.binns@gmail.com>

Tue, May 12, 2020 at 1:15 PM



9/29/2020

School District of Palm Beach County Mail - PBMA/Investigation

Robert L. Sheppard, Jr.  
Auditor/Investigator SRI  
Office of Inspector General  
3138 Forest Hill Blvd., Suite C-306  
West Palm Bch, FL 33406  
Phone: (561) 648-6877  
PX# 46877  
Email: [Robert.Sheppard@palmbeachschools.org](mailto:Robert.Sheppard@palmbeachschools.org)

[Quoted text hidden]



Robert Sheppard <[robert.sheppard@palmbeachschools.org](mailto:robert.sheppard@palmbeachschools.org)>

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## PBMA/Investigation

9 messages

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**Robert Sheppard** <[robert.sheppard@palmbeachschools.org](mailto:robert.sheppard@palmbeachschools.org)>

Mon, May 11, 2020 at 11:40 AM

To: [andy.binns@gmail.com](mailto:andy.binns@gmail.com)

Good morning Sir,

My name is Robert Sheppard with the Palm Beach County School District, Office of the Inspector General. My reasons for contacting you is to follow-up regarding an ongoing investigation at Palm Beach Maritime Academy. Respectfully at your convenience would you review/answer the below questions..

If further information is needed please do not hesitate to contact me at (561) 633-8922 or [Robert.Sheppard@palmbeachschools.org](mailto:Robert.Sheppard@palmbeachschools.org)

1. Did PBMA board members award a contract to contractor Dan Rishavy who owns/owned Edu-Links in 2014, Inc. (What services does Edu-Link Inc. provide?) What was the contract worth and contract terms....Can you provide documents....
2. During PBMA board meetings or at other events did Scott Shelley petition to award Daniel Rishavy's company (Edu-Link) service contract(s) for PBMA?
3. During board meetings or at any other times did Scott Shelley petition/advocate to have PBMA award a service contract(s) for BlueLine 360, Inc.?
4. Were board members aware that Scott Shelley was the Board Chairman or a representative for BlueLine 360, Inc.?
5. Were board members aware that Scott Shelley owned Apollo Advisory, Inc.? (What services for Apollo Advisory Inc. provide)...

Looking forward to hearing from you..Stay Safe!!

Robert L. Sheppard, Jr.  
Auditor/Investigator SRI  
Office of Inspector General  
3138 Forest Hill Blvd., Suite C-306  
West Palm Bch, FL 33406  
Phone: (561) 649-6877  
PX# 46877  
Email: [Robert.Sheppard@palmbeachschools.org](mailto:Robert.Sheppard@palmbeachschools.org)

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**Robert Sheppard** <[robert.sheppard@palmbeachschools.org](mailto:robert.sheppard@palmbeachschools.org)>

Mon, May 11, 2020 at 12:32 PM

To: [andy.binns@gmail.com](mailto:andy.binns@gmail.com)

Here you go sir....a question regarding Daniel Rishavy as a co-signatory in 2014..

1. Do you know or were you aware of Daniel Rishavy company "Edu-Link, Inc., receiving payments where he was the co-signatory in 2014? Are two signatures required to sign checks payable to a payee.....Did Rishavy sign checks payable to himself

Robert L. Sheppard, Jr.  
Auditor/Investigator SRI  
Office of Inspector General  
3138 Forest Hill Blvd., Suite C-306  
West Palm Bch, FL 33406  
Phone: (561) 648-6877  
PX# 46877  
Email: [Robert.Sheppard@palmbeachschools.org](mailto:Robert.Sheppard@palmbeachschools.org)

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**Andy Binns** <[andy.binns@gmail.com](mailto:andy.binns@gmail.com)>  
To: Robert Sheppard <[robert.sheppard@palmbeachschools.org](mailto:robert.sheppard@palmbeachschools.org)>

Mon, May 11, 2020 at 1:09 PM

On May 11, 2020, at 12:32 PM, Robert Sheppard <[robert.sheppard@palmbeachschools.org](mailto:robert.sheppard@palmbeachschools.org)> wrote:

Here you go sir....a question regarding Daniel Rishavy as a co-signatory in 2014..

1. Do you know or were you aware of Daniel Rishavy company "Edu-Link, Inc., receiving payments where he was the co-signatory in 2014? Are two signatures required to sign checks payable to a payee.....Did Rishavy sign checks payable to himself

*I started on the Board after this time. I am not aware of this. I believe the checks had to have the signature of the principal.. You would have to check with Marie T about whether Dan could sign....*

[Quoted text hidden]

**Disclaimer:** Under Florida law, e-mail addresses are public records. If you do not want your e-mail address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing.

---

**Andy Binns** <[andy.binns@gmail.com](mailto:andy.binns@gmail.com)>  
To: Robert Sheppard <[robert.sheppard@palmbeachschools.org](mailto:robert.sheppard@palmbeachschools.org)>

Mon, May 11, 2020 at 1:53 PM

On May 11, 2020, at 11:40 AM, Robert Sheppard <[robert.sheppard@palmbeachschools.org](mailto:robert.sheppard@palmbeachschools.org)> wrote:

Good morning Sir,

My name is Robert Sheppard with the Palm Beach County School District, Office of the Inspector General. My reasons for contacting you is to follow-up regarding an ongoing investigation at Palm Beach Maritime Academy. Respectfully at your convenience would you review/answer the below questions..

Exhibit #3

July 21, 2020 Email Response

From

Former PBMA Board Member

Richard Scott Shelley



To: Robert Sheppard <robert.sheppard@palmbeachschools.org>

**Questions:**

1. Who are the Board Members for PBMA?

Not sure who currently sits on the Board for PBMA. Andy Binns and David Jackson were board members when I left.

2. Are you currently a PBMA Board Member? If No when did you resign..

I resigned in March of 2020

3. Do you have any affiliations with the company called BlueLine 360 Inc. If Yes, what is your position?

I did not have any affiliation w/ BL360 during my time as a PBMA Board Member. I've never had a "position" with the company.

4. Did you disclose to the PBMA Board Members that you are affiliated with the company BlueLine 360, Inc.?

I was not affiliated w/ BL360 while on the Board of PBMA

5. Did you petition the PBMA Board Members to select BlueLine 360, Inc. to provide services to the PBMA schools?

**NO**, I did not personally know anyone at ASR, BL360 or James Billig when this engagement first began. A very good doctor friend of mine introduced me to one of the ASR guys and since I have no security experience I felt the best thing would be to connect them with the local Lantana PD and put it in the hands of law enforcement to decide if it would be proposed to the Board. **In August of 2018 I introduced ASR (an active threat security company) to Lantana PD and asked Lantana PD to advise the Board on the merits of the security system. Commander Haggarty of the Lantana PD came to a public Board meeting and recommended to the PBMA Board to incorporate the technology into the school safety strategy. The Board took the recommendation of Mr. Haggarty and unanimously voted to move forward with the security system. The next day Haggarty advised Marie Turchario, who then advised the Board that Lantana PD, would welcome the technology into the department but only with the inventor of the system (James Billig ret LEO) heading the project. Lantana PD would not participate in the partnership if ASR was involved after learning that ASR fired James Billig, the inventor of the system the night PBMA voted to move forward. No formal contract was ever signed with ASR. The PBMA Board Director, Andy Binns, after speaking with James Billig and getting an understanding of the situation, made a motion to table the project and give Mr. Billig the opportunity to form his own corporation and provide the alert system to the school. Which he did with Lantana PD's blessing.**

6. Does BlueLine 360 Inc. provide services to the PBMA schools? If Yes, when did BlueLine start to provide services?

**YES**, In April 2019 James Billig came back to the Board and re-proposed his AT-EAS system. The Board unanimously approved moving forward with BL360, the company Mr. Billig had recently formed. The system was installed in May 2019, I believe.

7. Do you own a company called Apollo Advisory Inc.?

**YES**, I have owned Apollo Advisory since 2008 to pay taxes and business expenses from. I also own RSM Financial Risk Management, LLC that I operate my financial consulting practice under.

8. Does Apollo Advisory provide marketing services for BlueLine 360, Inc.? If Yes, when did they start to provide marketing services for BlueLine?

**NO**, Apollo Advisory is not a marketing company.

[Quoted text hidden]

[Quoted text hidden]

**Disclaimer:** Under Florida law, e-mail addresses are public records. If you do not want your e-mail address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing.



Robert Sheppard <robert.sheppard@palmbeachschools.org>

## Palm Beach Maritime Academy (PBMA 20-0008-1)

2 messages

Robert Sheppard <robert.sheppard@palmbeachschools.org>

Tue, Jul 21, 2020 at 3:05 PM

To: emailScottShelley@gmail.com

Scott,

Below is a copy of the email that I initially forwarded to you on June 25, 2020. It appears that you did not receive the email, thus initiating on my behalf to contact you via certified mail respectfully requesting voluntary participation. Please review this email in its entirety and provide an email response to the eight (8) questions below.

Good Morning Mr. Shelley,

My name is Robert Sheppard with the Palm Beach County School District, Office of the Inspector General. My reasons for contacting you is that there is a pending investigation at Palm Beach Maritime Academy (PBMA). At this time you have been identified as a **subject**.

The allegation we received is: **Allegedly you did not disclose to the PBMA Board Members that you are the Board Chair Member for the company BlueLine 360 Inc., that currently provides services to PBMA. In addition, you own the company called Apollo Advisory Inc., that provides marketing services for BlueLine 360, Inc.**

I apologize sincerely for sending you this email as opposed to contacting you via telephone to possibly schedule a face-to-face interview. That said I've prepared a few questions regarding the said allegations for your review/response.

### Questions:

1. Who are the Board Members for PBMA?
2. Are you currently a PBMA Board Member? If No when did you resign..
3. Do you have any affiliations with the company called BlueLine 360 Inc. If Yes, what is your position?
4. Did you disclose to the PBMA Board Members that you are affiliated with the company BlueLine 360, Inc.?
5. Did you petition the PBMA Board Members to select BlueLine 360, Inc. to provide services to the PBMA schools?
6. Does BlueLine 360 Inc. provide services to the PBMA schools? If Yes, when did BlueLine start to provide services?
7. Do you own a company called Apollo Advisory Inc.?
8. Does Apollo Advisory provide marketing services for BlueLine 360, Inc.? If Yes, when did they start to provide marketing services for BlueLine?

Thank you for your time and response.

Again, I apologize for contacting you in this manner.

If further information is needed please do not hesitate to contact me at (561) 633-8922 or [Robert.Sheppard@palmbeachschools.org](mailto:Robert.Sheppard@palmbeachschools.org)

Robert L. Sheppard, Jr.  
 Auditor/Investigator SRI  
 Office of Inspector General  
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Scott Shelley <emailscottshelley@gmail.com>

Tue, Jul 21, 2020 at 5:31 PM

Exhibit #4  
Recorded Audio Discussion Meeting Minutes  
For  
February 20, 2019, Board Meeting  
(See file)



Exhibit #5  
PBMA Monthly Agenda Meeting Minutes  
From  
January 2019 through July 2019



Minutes of Palm Beach Maritime Museum, Inc. d/b/a Palm Beach Maritime Academy School IDS #2801 & 3924  
Location: 600 S. East Coast Avenue, Lantana, Florida 33462  
Notice of the Board Meeting was posted on PBMA'S website and at both campuses  
Board Meeting Minutes Wednesday, January 30, 2019 at 5:00 p.m.

Participating Board Members via telephone Andrew Binns, and Scott Shelley. Paul Copeland, Marie Turchiaro, Cesare Boffice, Daniel Barone, Steve Casenza, Daniel Rishavy, and DonnaLee Bourbeau, via telephone was Deborah Ward

**Agenda Item 1: Call Meeting to Order**

Meeting was called to Order by Scott Shelley at 5:07 pm

**Agenda Item 2: Review Draft Agenda and Adopt Final Agenda**

After review of the draft agenda Scott Shelley made a motion to approve the draft agenda, with additional item 3b - Update on Litigation, the Board moved to approve the Final Draft Agenda.

Motioned to Approve: SS  
Seconded: AB  
Two (2) Board members in agreement  
Motion Carried 2/2

**Agenda Item 3: Update Budget – Dan Rishavy**

- a. Presentation and Discussion of Updated Budget, Acceptance by Board – After a presentation of the Budget – Dan requested Board approval. Andrew Binns made a Motion to approve the Budget with an expected Fund Balance of a positive \$12,707.00 for the Fiscal Year 2019.

Motioned to Approve: AB  
Seconded: SS  
Two (2) Board members in agreement  
Motion Carried 2/2

Daniel Rishavy requested Board Approval of the Check List that needs to be signed by the Board Chairman if the year to date have expenditures exceeding revenues for 3 consecutive months. Andrew Binns made a Motion to approve the Check List.

Motioned to Approve: AB  
Seconded: SS  
Two (2) Board members in agreement  
Motion Carried 2/2

- b. Update on Law Suit – Dan Rishavy updated the Board that the Federal lawsuit is fully engaged and that he had submitted answers to interrogatories. There were 107 items which involved details back to before the Bond was approved, he was required to attest that all answers were true and correct under threat of perjury. Daniel Rishavy signed on behalf of the school, he has to be able to attest in Court. He is requesting the Board acknowledge that he signed off on behalf of the school. Andrew Binns made a recommendation that the Board sign an acknowledgement that Daniel Rishavy at Linkup is the Representative who has knowledge of the lawsuit and that he is the person engaged by the Board and he should be able to make the decisions and sign the interrogatories for the Board. He is the Representative to sign interrogatories and any other necessary documents pertaining to the ongoing litigation.

Motioned to Approve: AB  
Seconded: SS  
Two (2) Board members in agreement  
Motion Carried 2/2

Daniel Rishavy informed the Board that the venue for this case has been moved to New York, Southern District of New York. Jermaine Lee is going to file so he can represent the school in New York. The school will also need

to engage a local attorney for local matter that may come up. Andrew Binns made a Recommendation to engage a local attorney in this matter, but there was discussion as to Jermaine paying for him/her.

Motioned to Approve: AB  
Seconded: SS  
Two (2) Board members in agreement  
Motion Carried 2/2

Scott Shelly would like to check the language in the Contact – all were in agreement.

Daniel Rishavy wanted to make the Board aware that after the suit was filed, several firms that finance litigation contacted Jermaine Lee and that he asked him to follow up to see what they offered. Mr. Lee responded back that they will finance up to \$100,000.00 of the litigation expenses, not sure of the percentage of what they take from that amount. However, if the school doesn't win the lawsuit, the school will not have to pay, but if the school wins the suit the firm receives the \$100,000.00 plus, Daniel Rishavy will find out the percentage/amount.

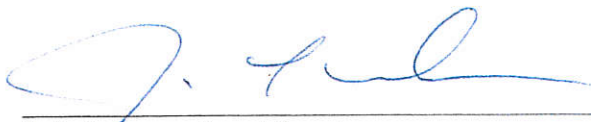
**Agenda Item 4: Public Comment**

None

**Agenda Item 5: Adjournment**

Scott Shelley Motion to adjourn the meeting at 5:29 p.m.

Motioned to Approve: SS  
Seconded: AB  
Two (2) Board members in agreement  
Motion Carried 2/2



Judy Lehman, Board Secretary

2/20/2019

Date



**PROUDLY CELEBRATING A HISTORY OF ACADEMIC EXCELLENCE**

1518 W. Lantana Road, Lantana, FL 33462 | T (561) 547-3775 | Fax (561) 540.5177 | enrollment@pbmalantana.org  
600 S. East Coast Ave., Lantana, FL 33462 | T (561) 578-5700 | Fax (561) 337.3400 | enrollment@pbmalantana.org





Palm Beach Maritime Museum, Inc. d/b/a Palm Beach Maritime Academy School IDS #2801 & 3924  
Location: 600 S. East Coast Avenue, Lantana, Florida 33462  
Notice of the Board Meeting was posted on PBMA'S website and at both campuses  
Draft Board Meeting Minutes Wednesday, January 9, 2019 at 5:00 p.m.

Participating were Andy Binns, Scott Shelley, Judy Lehman Paul Copeland, Marie Turchiaro, Cesare Boffice, Shari Cooper, Daniel Barone, Steve Casenza, Daniel Rishavy, Deborah Ward, DonnaLee Bourbeau and Anthony Miller

**Agenda Item 1: Call Meeting to Order**

Meeting was called to Order by Judy Lehman at 5:00 pm

**Agenda Item 2: Review Draft Agenda and Adopt Final Agenda**

After review of the draft agenda Judy Lehman made a motion to approve the draft agenda, with the following changes: Move Item 4c to Item 4a, then Item 6, Item 4. Board moved to approve the Final Draft Agenda.

Motioned to Approve: JL  
Seconded: AB  
Three (3) Board members in agreement  
Motion Carried 3/3

**Agenda Item 3: Review and Approve Board Meeting Minutes of 10-31-18, 11-8-18 and 11-30-18.**

After a review of the Minutes, Judy Lehman made a motion to approve the Board Meeting Minutes of October 31, 2018, November 8, 2018 and November 30, 2018

Motioned to Approve: JL  
Seconded: AB  
Three (3) Board members in agreement  
Motion Carried 3/3

**Agenda Item 4: Executive Director's Report**

- c. Board Vote on Agreement on Conveyance, Transfer and Assignment of Assists, Assumption of Obligations & Indemnification Against Liability Palm Beach Maritime Museum – Prepared by L. Lembruno for the Arnold Law Firm following conversations with M Turchiaro and S Casenza. After a discussion Anthony Miller requested that the Agreement read “Mariner Museum of Florida” as the “Assignee”. Judy Lehman made a motion to move forward with the Conveyance Agreement.

Motioned to Approve: JL  
Seconded: AB  
Three (3) Board members in agreement  
Motion Carried 3/3

**Agenda Item 6: Financials/Budget – Daniel Rishavy**

After a presentation of the Budget – Dan requested the Board to adopt the 4<sup>th</sup> Draft Budget. Judy Lehman made a motion to accept the 4<sup>th</sup> Draft Budget.

Motioned to Approve: JL  
Seconded: SS  
Three (3) Board members in agreement  
Motion Carried 3/3

Judy asked if there had been any resolution on the Principals' concerns about financials being given to the Principals in a timely fashion for their signature. Dan said he had made the commitment to have the reports ready five days before they were due to be signed and Reno reiterated that supporting documentation was to be included.

**Agenda Item 4: Executive Director's Report**

- a. Update on Police – MT updated the Board that she has spoken with the Lantana Police and stopped services, continuing with Vestige Security. Our excellent relationship with Lantana Police will continue with our March Madness Tournament and end-of-year activities.
- b. FTE Audit Update – Audit scheduled for February 13, 2019. Andy Binns will do a staff presentation to go over all the requirements needed for the Auditor.

**Agenda Item 5: Principals' Report – Dr. Paul Copeland and Mr. Cesare Boffice**

Dr. Copeland explained to the Board that the Elementary School finished iReady, moved 10% Tier 1 in Reading and 14% in Math. Enrollment is at a plus 1 students from this time last school year. Has nine 3rd grade students on waiting list and two 1st grade students on waiting list. AB requested they try to get the student enrolled, SC will call parents before Monday to see about enrolling the students.

Mr. Boffice – Middle School at 338 students up 32 students from last year, High School 183 students up 17 from last year.

Dr. Copeland – Elementary has 538 students up 6 students from last year

- a. Out of Field Teacher for Board Approval - Dr. Jacqueline Kelly – 5th grade. Has Letter of Eligibility, only needs to pass State exam, is scheduled to take test at the end of the month. Judy Lehman made a motion to accept the Out of Field Teacher.

Motioned to Approve: JL

Seconded: SS

Three (3) Board members in agreement

Motion Carried 3/3

- b. Title I – Report on Single School Culture Coordinators – SSCCs are assisting by working with SBT, Data Chats, ES Program, Test Coordinators, Elementary Building Administrator when Dr. Copland is off campus.

Mr. Boffice – 100% on block schedules with ELA and Math scheduling in Middle School. Geometry scores are outstanding, Biology are in the 91%ile on the last USA exam.

**Fixed Assets Clarification/Referendum:** Andy Binns commented about the Audit – 1. He explained that all staff report all assets cost of more than \$100.00. He explained “Fixed Assets” 2. The lawsuit on the referendum is being filed on January 10, 2019 at 1:00 pm; there are 13 other schools in the suit. If someone calls to discuss the lawsuit, we should explain that a case has been filed and direct them to the Attorney Shawn Arnold’s law firm.

After a discussion Judy Lehman made a recommendation to move forward with the Joint Defense and Common Interest Agreement.

Motioned to Approve: JL

Seconded: AB

Two (2) Board members in agreement

Motion Carried 2/2

**Agenda Item 7: Update on Chan vs. Shelley/Packerland – Steve Casenza**

Steve Casenza updated the Board regarding expenses and payments. Andy Binns made a request that moving forward anything to do with the lawsuit involving Scott that Steve Casenza be the “Point Person”.

**Agenda Item 8: Public Comment –**

Steve Casenza addressed the emails that were sent to Marie from Scott Shelley saying he felt they were out of line and the comments were unprofessional. Scott Shelley apologized and said he over stepped his boundaries.

**Agenda Item 11: Adjournment at 7:05 p.m.**

  
\_\_\_\_\_  
Judy Lehman, Board Secretary

2/20/2019  
\_\_\_\_\_  
Date







Minutes of Palm Beach Maritime Museum, Inc. d/b/a Palm Beach Maritime Academy School IDS #2801 & 3924

Location: 600 S. East Coast Avenue, Lantana, Florida 33462

Notice of the Board Meeting was posted on PBMA'S website and at both campuses

Board Meeting Minutes Wednesday, February 20, 2019, at 5:00 p.m.

Participating Board Members Andrew Binns, Judy Lehman, and Scott Shelley. Marie Turchiaro, Cesare Boffice, Paul Copeland, Ana Tessier, Daniel Barone, Shari Cooper, Steve Casenza, Daniel Rishavy, Cindy Willmot, and DonnaLee Bourbeau. Also in attendance were James Billing, Jeff Wiebell, Kelly Sturithal, Paul Murry and Robert Hagerty

**Agenda Item 1: Call Meeting to Order**

Meeting was called to Order by Andy Binns at 5:00 pm

**Agenda Item 2: Review Draft Agenda and Adopt Final Agenda**

After review of the draft agenda Judy Lehman made a motion to approve the draft agenda, with the following additional items under Executive Director's Report: add a Statement for the IDEA Grant, stating that Marie Turchiaro is authorized to sign any Grants as item b; and Approval of Fund for the SLP as item c. Board moved to approve the Final Draft Agenda.

Motioned to Approve: JL

Seconded: SS

Three (3) Board members in agreement

Motion Carried 3/3

**Agenda Item 3: Review and Approve Board Meeting Minutes of January 9, 2019 and January 30, 2019**

After a review of the Minutes, Judy Lehman made a motion to approve the Board Meeting Minutes of January 9, 2019 and January 30, 2019

Motioned to Approve: JL

Seconded: SS

Three (3) Board members in agreement

Motion Carried 3/3

**Agenda Item 4: Presentation – Active Threat Early Alert System – possibly to be paid for through \$5K donation by Lantana Police Department and possible outside funding – Jimmy Billing, BlueLine [jbilling@blueline360.com](mailto:jbilling@blueline360.com)**

Jimmy Billing gave a presentation to the Board of the Active Threat Early Alert System. Then Jeff Wiebell with ourong.store gave a Fund Raising presentation to the Board. After Board discussion Judy Lehman made a motion to approve the purchase of the Active Threat Early Alert System services. The installation would be the week of March 18, 2019. Marie Turchiaro asked about what was included in the \$18,000.00 purchase price for both facilities. It would be in all classrooms and offices. The system, hardware, software, training, upkeep, and updates are included in the purchase price. The estimated annual fee would be around \$3,000.00. The company has decided to waive the first year's annual fee. Everyone needs to be trained to use the system.

**Agenda Item 5: Executive Director's Report – Marie Turchiaro**

a. Update – Title 1 – Passed

b. Statement for the IDEA Grant, stating that Marie Turchiaro is authorized to sign any grants – Judy Lehman made a motion that the Principals or the Executive Director can sign off on any Federal Grant Reimbursements.

Motioned to Approve: JL

Seconded: SS

Three (3) Board members in agreement

Motion Carried 3/3

c. Approval of Fund for the SLP – same as above

**Agenda Item 6: Principals' Report – Mr. Reno Boffice, Dr. Paul Copeland, Mr. Chris Skierski**

a. Presentation of Diagnostic results and comparison; plans for closing the gaps: - Dr. Copeland passed out the handout for the lower school – For K-5 I Ready Winter Diagnostics, the main focus is Tier 1 means student is on



grade level, Tier 2 means the student is one year behind, Tier 3 means the student is 2 or more years behind. We are up across the board except for Math, and we're closing the gaps on that.

Mr. Boffice – Presented a Power Point Presentation on the Winter Diagnostics and FSA's of grades 6 -12. Presentation will be forwarded to the Board.

**Agenda Item 7: HR Report – Steve Casenza**

- a. Update on Shelley/Packerland/Chan – Paid all of our deductibles right now
- b. Update on Paylocity – Going very well, did first payroll in November, using the Web-time since we came back from Winter break. Integrated the 403b plan, next process we will be working on building the on-boarding, we'll be an online on boarding system. Marie Turchiaro want to congratulate Steve because it's a "monster" with many moving parts. The transition was seamless, emails and reminders helped people out. Ms. T thanked Mr. Casenza for all his hard work in implementing the system.
- c. Update on Roof Inspection - The inspection was done by an independent roof inspection company, showed the repairs were botched. Need to go back to Latite and have them fix it. It needs to be fixed between now and May
- d. Andrew Binns – meet with the attorney for the District's lawsuit. The District's response was basically there was nothing to debate, needs to go to a Judge to decide, they are not disputing the facts. It's a matter of interpretation of the law. Wants ruling by the judge. Legislature may solve, there's a shell bill, and it's a statement regarding the voted mileages. Could go to court and be solved by May. Also the ruling that every school has to have a resource office will be coming out any day. Judy Lehman told the Board that she may have to recuse herself from the Board. Andy Binns has someone interested in becoming a Board member

**Agenda Item 8: Budget/Financials – Dan Rishavy**

Starting out with the lawsuit he requested the Board look at the minutes, has one issue he would like the Board to reconsider the comment he made on the funds that we are applying for would be a \$200,000.00 minimum, not \$100,000.00. Hapolin has requested dismissal of the whole case or some portion of it that has to do with the security portion. Jermaine thinks they have no chance of having the whole case dismissed. They want to wait until there's a ruling because the money is none recourse. But if they do they will give us the rates and a \$200,000.00 minimum. The case went to the Southern District of New York, waiting on coordination issues.

*Budget* – We have met 4 times, gone thru every line item, looking at year to date expenditures. Net results is we have a projected budgets surplus to the end of the year currently of approximately \$67,000.00. Andy Binns and Dan spoke and recommend not to change the last adopted budget, it was positive \$12,700.00. Dan explained the new system and how it can update the revenue sheet. Marie will have the pass code that can lock and unlock and can make the changes. Dan asked that if the whole dollar amount of the budget is still ok that we have the authority to approve a line item change it that occurs. Marie Turchiaro asked regarding the adjustment to the budget items, she would like to meet more frequently. Andy Binns made a motion to designate Scott Shelley for the next two weeks to sign any documents on behalf of the Board Chairmen.

Motioned to Approve: AB  
 Seconded: JL  
 Three (3) Board members in agreement  
 Motion Carried 3/3


**Agenda Item 9: Public Comment**

None

**Agenda Item 10: Adjournment**

Andy Binns made a motion to adjourn the Board Meeting at 7:37 p.m.

Motioned to Approve: AB  
 Seconded: JL  
 Three (3) Board members in agreement  
 Motion Carried 3/3

  
 \_\_\_\_\_  
 Judy Lehman, Board Secretary

\_\_\_\_\_ 3/27/2019  
 Date







Minutes of Palm Beach Maritime Museum, Inc. d/b/a Palm Beach Maritime Academy School IDS #2801 & 3924

Location: 600 S. East Coast Avenue, Lantana, Florida 33462

Notice of the Board Meeting was posted on PBMA'S website and at both campuses

Board Meeting Minutes Wednesday, March 27, 2019, at 5:00 p.m.

Participating Board Members Andrew Binns, Judy Lehman, and via telephone Scott Shelley, Marie Turchiaro, Cesare Boffice, Paul Copeland, Ana Tessier, Daniel Barone, Shari Cooper, Steve Casenza, Daniel Rishavy, Cindy Willmot, DonnaLee Bourbeau, Kelley Maloney, Boris Aguilar, Ian Bottom, Valerie Pratt Owen, Cindy Stromeyer, Chris Skierski, Maria Acevedo, Chris Nicolini, Paul DeDomeinco, Deborah Ward, Laura Paige Cruise, Frances Kennedy. Also in attendance was David C. Jackson, John Sargent and Andrew Boyd.

**Agenda Item 1: Call Meeting to Order**

Meeting was called to Order by Andy Binns at 5:05 pm

**Agenda Item 2: Review Draft Agenda and Adopt Final Agenda**

After review of the draft agenda Judy Lehman made a motion to approve the draft agenda, with the following change, Agenda Item #8 moved up to Agenda Item #4c. Board moved to approve the Final Draft Agenda.

Motioned to Approve: JL

Seconded: SS

Three (3) Board members in agreement

Motion Carried 3/3

**Agenda Item 3: Review and Approve Board Meeting Minutes of February 20, 2019**

After a review of the Minutes, Judy Lehman made a motion to approve the Board Meeting Minutes February 20, 2019

Motioned to Approve: JL

Seconded: SS

Three (3) Board members in agreement

Motion Carried 3/3

**Agenda Item 4: Introduction of Potential New Board Members:**

- a. Mr. David Jackson
- b. Dr. John Seargeant

Andrew Binns- Concerned about only 3 Board members, he explained the dynamics of the school and gave a brief overview of the Boards duties and workings. Marie Turchiaro gave a brief presentation about the school. Cesare Boffice also gave a brief presentation about the High School. Andrew Binns then introduced Mr. Jackson and Dr. Seargeant and asked them to tell the Board about themselves.

- a. Mr. David Jackson – He is a resident and native of Palm Beach County, attended school in Palm Beach County school system, went to college at USF and got his Masters at FAU. Involved in the Boca Rottery Club for 30 years which focus on graduating Scholarships for high school seniors. Works for TD Bank, is familiar with Charter Schools transactions and has an idea of how they work. Looks at his role on this Board as support; he's not a teacher or instructor, but anything he can do to help as far as additional revenue sources for the school or below the line as far as the expensive, minimize those areas.
- b. Dr. John Seargeant – is a retired Palm Beach County employee/educator, was an Elementary Classroom teacher, a PE Teacher. Because a Guidance Counselor and as part of that he worked for a vocational rehabilitation (Boca Rehab). Came back to Palm Beach County School District, was a school psychologist, was involved in different projects in the Special Education Department and within years started running projects. 1975 was an Administrator in the Special Education Department in Palm Beach County Schools, expect for a 5 year stint, left Palm Beach County and went to work for FAU in a Federal Funded through the State through the University a multi-regional program covered the entire United States, traveled 9 states and worked with them to develop the IDEA, 4102 issues when it first began. Came back to Palm Beach County Schools, was the Southern Area Administrator for the Special Education department for 14 years, covered 30-35 schools which was 30% of the Special Education population. The last 5 years before he retired he went to the District office and became the

Manager , was the District's ESE representative to review charter school applications and then go out to observe the charter schools to see if they were implementing the IDEA issues. Now retired.

Andy Binns explained that the Board meets on the last Wednesday of the month. The District requires every month, we submit financial records to them. At every Board meeting we look at the budget. We must posts the budget to meet the Districts requirements we are at 100% compliance.

K-8 Charter is a 15 year Charter, goes to 2028. High School is due this year. Andy Binns explained the current law suit with Palm Beach County Schools and Charter Schools regarding the tax mileage.

- c. Budget/Financials – Mr. Dan Rishavy reviewed the budget and we are positive and well within the guidelines for safety margins for the schools operations. The school's academic and instructional side is not overspending. The difference were the one time expenditures that won't occur next year. Examples the buses, legal expenses, security and text books. He explained the process of reviewing the financial statements with administration and requesting the Boards adoption of the monthly financial statements. He also gave a brief overview of the Bond Issue, recovery settlement. Andy Binns made a motion to recommend that the Board accept the Financial Statements for the month.

Motioned to Approve: AB

Seconded: JL

Three (3) Board members in agreement

Motion Carried 3/3

**Agenda Item 5: Executive Director's Report – Marie Turchiaro**

- a. Update – Annual Review – Had the annual review for 2801 we did very nicely.
- b. Update on Charter Renewal and Obtaining Contract of 3924 – Renewal was already done and was approved on February 4, 2019. The next step is to renegotiate the Charter for the High School. Waiting on the District to give us the paperwork that we need for the Charter, it's supposed to be sent in the strike through format within 30 days of the approval of the annual review. We have contacted our attorney who proposes that we prepare our draft based on another schools who have an accepted charter this year and then go ahead and submit it.
- c. Update on Alert System – Board contracted at last Board meeting to put in an Alert system, the alarm boxes would be in each classroom, these alarms would bypass 911 and go directly to the police station with the idea of eliminating the 2 or 3 minutes that it takes to go to 911 in case you have an active shooter. The system was installed, and there was a presentation/training. At the presentation, it was stated that the boxes were installed in different classrooms around the school. A tape of the Board meeting of 2/20/19 during the initial presentation states that "you won't have boxes in some of the classrooms, you will have a box in all classroom". Ms.Turchiaro sent an email requesting no more work until we have a contact and have a sit down and figure out the situation. At this point all activity has been stopped until we receive a contact from them and they resolve the other issue.

**Agenda Item 6: Principals' Report – Mr. Reno Boffice, Dr. Paul Copeland**

- a. Enrollment – Enrollment number for this year of students coming back 861 for both K-12, last year at this time we were at 836, the numbers are not plus of 25 students.

**Agenda Item 7: HR Report – Steve Casenza**

- a. HR/Admin Teacher Pay proposal – Steve explained the school issue to the Board prior to the meeting a proposal for pay raises for the 2019-2020 school year. The plan is based on the 2018-2019 school year evaluations. Highly Effective will receive an increase of 3.5%, Effective will receive an increase of 2.75% and all other ratings receive a 0.5% increase. He also proposed initiative to ensure that employees will be on an equivalent scale as the district based on years of experience up to 15 years of experience. Any current teacher that after the merit pay increase is still below the new hire rate on the District's 2018-2019 salary schedule for their years of experience will be adjusted to the new hire rate with a maximum at 15 years. Also the schools intensions are if we are successful in our litigation against the District is to match the temporary salary increases 1 to 5 years' experience will pay \$1000, 6 to 10 years' experience will pay \$5000, over 10 years will receive \$10,000, this is all contingent on the school success in the pending law suit with the District. Judy Lehman made a motion effective for the school year 2019-2020 to approve merit pay increases based on teachers' 2018-2019 evaluations, a rating of Highly Effective will result in a raise of 3.5%, Effective will result in a raise of 2.75% and all other ratings would receive a 0.5% increase. Also Judy Lehman made a motion to approve an initiative to ensure that employees will be on an equivalent scale as the district based on years of experience up to 15 years of experience.

Motioned to Approve: JL

Seconded: AB

(Two) 2 Board members in agreement

Motion Carried

2/3

- b. Vacation/PTO/School Closing (Camp Open) One Week in Summer Proposal - Steve made proposal to the Board requesting the school close the week of July 4<sup>th</sup>, starting the Friday before closing those 5 days. All effective personal will be charged 5 vacation days, however if there is Reading Camp or Summer Camp and full time employee that have to work during that time they will keep their vacation and we will work with them. A PTO change was proposed effective immediately, would eliminate 10 month employee rollover PTOs, currently we have an option to rollover 3 days to the next year and we offer a buyout of \$50.00 per day per unused PTO. Proposing not to have the rollover and increase the buyout to \$100.00 per day. Andy Binns recommended the school be close the July 4<sup>th</sup> week every year beginning this year. Andy also recommended any unused PTO at the end of the school year for 10 month employees will be paid out at a rate of \$100.00 per unused day.

Motioned to Approve: AB  
Seconded: JL  
(Two) 2 Board members in agreement  
Motion Carried 2/3

**Agenda Item 8: Public Comment**

There was a question about the PTO time, Andy Binns clarified

**Agenda Item 9: Adjournment**

Andy Binns made a motion to adjourn the Board Meeting at 6:50 p.m.

Motioned to Approve: AB  
Seconded: JL  
Two (2) Board members in agreement  
Motion Carried 2/3

  
\_\_\_\_\_  
Judy Lehman, Board Secretary

4/24/2019  
\_\_\_\_\_  
Date



**PROUDLY CELEBRATING A HISTORY OF ACADEMIC EXCELLENCE**

1518 W. Lantana Road, Lantana, FL 33462 | T (561) 547-3775 | Fax (561) 540.5177 | enrollment@pbmalantana.org  
600 S. East Coast Ave., Lantana, FL 33462 | T (561) 578-5700 | Fax (561) 337.3400 | enrollment@pbmalantana.org





Minutes of Palm Beach Maritime Museum, Inc. d/b/a Palm Beach Maritime Academy School IDS #2801 & 3924

Location: 600 S. East Coast Avenue, Lantana, Florida 33462

Notice of the Special Board Meeting was posted on PBMA'S website and at both campuses

Board Meeting Minutes Tuesday, **April 2, 2019, at 5:00 p.m.**

Participating Board Members Andrew Binns, Judy Lehman, via telephone. Cesare Boffice, Donna Lee Bourbeau and Ana Tessier and via telephone was Steve Casenza,

**Agenda Item 1: Call Meeting to Order**

Meeting was called to Order by Andy Binns at 5:00 pm. Quorum present.

**Agenda Item 2: Review Draft Agenda and Adopt Final Agenda**

After review of the draft agenda Andy Binns made a motion to approve the draft Agenda. Board moved to approve the Final Draft Agenda.

Motioned to Approve: AB

Seconded: JL

Two (2) Board members in agreement

Motion Carried 2/2

**Agenda Item 3: Board to Vote on New Board Member**

a. Mr. David Jackson

Andrew Binns made a recommendation to invite David Jackson to be a member of the Board of Directors.

Motioned to Approve: AB

Seconded: JL

Two (2) Board members in agreement

Motion Carried 2/2

b. Dr. John Sargeant

Andrew Binns made a recommendation to invite John Sargeant to be a member of the Board of Directors.

Motioned to Approve: AB

Seconded: JL

Two (2) Board members in agreement

Motion Carried 2/2

**Agenda Item 4: Public Comment**

None

**Agenda Item 5: Adjournment**

Andy Binns made a motion to adjourn the Board Meeting at 5:05 p.m.

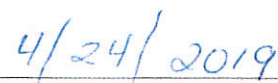
Motioned to Approve: AB

Seconded: JL

Two (2) Board members in agreement

Motion Carried 2/3

  
\_\_\_\_\_  
Judy Lehman, Board Secretary

  
\_\_\_\_\_  
Date



**PROUDLY CELEBRATING A HISTORY OF ACADEMIC EXCELLENCE**

1518 W. Lantana Road, Lantana, FL 33462 | T (561) 547-3775 | Fax (561) 540.5177 | enrollment@pbmalantana.org  
600 S. East Coast Ave., Lantana, FL 33462 | T (561) 578-5700 | Fax (561) 337.3400 | enrollment@pbmalantana.org

**Palm Beach Maritime Academy and High School**  
**Approved Governing Board Meeting Minutes**  
**July 24, 2019**

Participating were Andy Binns, Chariman (AB) and Board Members David Jackson (DJ) and Scott Shelley (SS) (via telephone) thereby establishing a quorum.

Also present were Marie Tuchiario (MT), Steve Casenza, Reno Boffice, Chelsea Rupp, Deborah Ward, Daniel Barone, Ana Tessier, Shari Cooper, Chris Nicolini, Dan Rishavy and Jane Murphy.

The meeting was called to order by the chairman at 5:14pm.

The meeting agenda was approved by SS, and seconded by DJ.

MT introduced Chelsea Rupp and recommended that the Board to appoint her Principal of the K-5 campus. Dr. Binns accepted the recommendation. Motion to Appoint Ms. Rupp as Elementary Principal made by DJ, seconded by SS. Approved 3/3.

AB will be bringing a seasoned Principal in to be a mentor/consultant to both Principals to assist in working with ELL students.

In addition, the District rezoned several schools and many parents were dissatisfied; we were therefore getting many new students with a heavy ELL concentration.

Enrollment at this time last year was 1070 and as of today, 1111. The current budget is based on 1113.

Ms. T opened a discussion about controlled open enrollment. It was suggested and agreed that a lottery triggered by a date only if we have more students than seats and can be in particular grades when that criteria is met.

AB announced a meeting on Monday, July 29, 2019 at 1:00pm to review/approve items due on the Opening of School Checklist as requested by Ms. T.

Steve Casenza suggested that we create Board Officers for Sun Biz. Steve informed the Board that there could be a 5% increase in Florida Blue insurance. He also added that the roof at the elementary campus may be able to be repaired without redoing it. He will continue to advise the Board.

AB suggested that both campuses open internal accounts.

Parent/Family Compact and Parent Engagement Plans was approved by SS and seconded by DJ. Approved 3/3.



Both Principals gave presentations on school grades and changes they are putting in place to increase student achievement. .

AB and DR presented Financials/Budget.

There were no public comments.

There being no further business, AB motioned for adjournment, seconded by DJ. Approved 3/3.

---

Chairman

---

Date

# **PALM BEACH MARITIME ACADEMY AND HIGH SCHOOL NOTICE OF GOVERNING BOARD MEETING**

A Governing Board Meeting will be held on July 29, 2019 at 1:00 P.M. at the Middle/High School Campus, 600 S. East Coast Avenue, Lantana, FL 33462, Building #2.

The meeting will utilize Communications Media Technology ("CMT"). The CMT used will be the following conference call-in number: 720-835-5924, Conference Code Pin #52807. Interested persons may either attend this meeting via CMT or in person at the above location.

For more information about the meeting or to request that an item be considered for the Agenda, please contact Executive Director Marie Turchiaro no later than 48 business hours prior to the meeting at [MTuchario@PBMAlantana.org](mailto:MTuchario@PBMAlantana.org).

Lantana 1  
Chelsea Rupp, Principal  
1518 West Lantana Road  
Lantana, FL 33462  
Phone No.: (561)547-3775  
Fax No.: (561)540-5177

Lantana 2  
Cesare Boffice, Principal  
600 S. East Coast Avenue  
Lantana, FL 33462  
Phone No.: (561)578-5700  
Fax No.: (561)337-3400

**Palm Beach Maritime Academy and High School**  
**Approved Governing Board Meeting Minutes**  
**July 29, 2019**

Participating were Andy Binns, Chairman (AB), Scott Shelley (SS) and David Jackson (DJ) board members all via phone, thereby establishing a quorum.

Also participating were Steve Cansenza, Dan Rishavy, Jane Murphy, Donnalee Bourbeau and Anthony Andrepont all via phone.

The meeting was called to order by the Chairman.

AB motioned to approve agenda seconded by SS.

Steve presented on the Speech/Language Contract. Both schools and will be about 30/35 hours a week. AB recommended approval; seconded by SS. Adopted 3/3.

Steve presented the Security Contract which has to be in place by August 30, 2019 to meet statutory requirements. Discussion at next meeting about security during extra hours before and after school. AB motioned to approve and it was seconded by SS. Approved 3/3.

AB recommended the approval of the Charter Contract based on the changes made by the attorney. SS seconded the motion. Approved 3/3.

Dan Rishavy reported on the Closing Financials for FY19. AB recommended to adopt the final budget. The recommendation was seconded by SS. Approved 3/3.

AB recommended that the audit engagement letter be approved. The recommendation was seconded by SS. Approved 3/3.

The meeting was adjourned at 1:17pm by AB and seconded by SS. Approved 3/3.

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Chairman – Dr. Andy Binns

---

Date

Exhibit #6  
Financial Industry Regulatory Authority  
(FINRA)  
&  
Investment Adviser Public Disclosure  
(IAPD)  
Summary Reports



Robert Sheppard &lt;robert.sheppard@palmbeachschools.org&gt;

**Case #: CAS-2117380-C1C9M9 RE: Call Center Feedback: SHEPPARD, ROBERT  
CRM:0494000000534**

1 message

**Customer Support** <GatewaySupport@finra.org>  
To: Robert SHEPPARD <Robert.Sheppard@palmbeachschools.org>

Thu, Oct 15, 2020 at 4:55 PM

Hello Robert,

You can confirm if a company is a registered broker dealer firm or investment adviser firm online by using the FINRA BrokerCheck tool, <https://brokercheck.finra.org/>. A brokerage firm, also called a broker-dealer, is in the business of buying and selling securities – stocks, bonds, mutual funds, and certain other investment products – on behalf of its customer (as broker), for its own bank (dealer), or both. An investment adviser is paid for providing advice about securities to clients. In addition, some investment advisers manage investment portfolios and offer financial planning services. You are also able to use the BrokerCheck search tool to search for broker dealer representatives and investment adviser representatives that are either actively FINRA registered or have been registered within the past 10 years. If you need assistance using the BrokerCheck search tool please call our BrokerCheck Help Line at (800) 289-9999 available Monday through Friday 8AM-8PM EST.

I see using the BrokerCheck search tool that Richard Scott Shelley (CRD#2671545) is an actively registered broker and investment adviser representative, registered with Packerland Brokerage Services, Inc. (CRD# 37031). If you would like more information about Christopher please click the following link <https://brokercheck.finra.org/individual/summary/4853840>. According to the Detailed Report on BrokerCheck, specifically the Other Business Details Section, Richard started with Apollo Advisory on 10/15/2020; there is no start date mentioned for BlueLine 360.

Thanks,  
FINRA Customer Support

----- Original Message -----

**From:** Robert SHEPPARD;  
**Received:** Wed Oct 14 2020 20:23:49 GMT-0400 (Eastern Daylight Time)  
**To:** [GatewaySupport@finra.org](mailto:GatewaySupport@finra.org); GBAS;  
**Subject:** Call Center Feedback: SHEPPARD, ROBERT

---

Date: 10/14/2020 8:23 PM  
First Name: ROBERT  
Last Name: SHEPPARD  
Phone Number: 561-649-6877  
Email: [Robert.Sheppard@palmbeachschools.org](mailto:Robert.Sheppard@palmbeachschools.org)  
CRD Number: 2671545/Richard Scott Shelley  
What page or area of the website: [www.finra.org](http://www.finra.org)  
Referring page user was: <https://www.finra.org/contact-finra>



visiting  
before  
feedback  
form:

Feedback message: Good evening, Please allow me to briefly introduce myself to you and explain my reasons for contacting you. My name is Robert Sheppard with the Palm Beach County School District, Office of the Inspector General. I'm conducting an investigation regarding "CRD#2671545 Richard Scott Shelley" affiliations with Blueline 360, Inc. and Apollo Advisory, Inc. Respectfully, if possible could you please provide me the date(s) when Mr. Shelley initially submitted information to "FINRA" regarding Blueline 360, Inc. and Apollo Advisory, Inc.

---

Confidentiality Notice:: This email, including attachments, may include non-public, proprietary, confidential or legally privileged information. If you are not an intended recipient or an authorized agent of an intended recipient, you are hereby notified that any dissemination, distribution or copying of the information contained in or transmitted with this e-mail is unauthorized and strictly prohibited. If you have received this email in error, please notify the sender by replying to this message and permanently delete this e-mail, its attachments, and any copies of it immediately. You should not retain, copy or use this e-mail or any attachment for any purpose, nor disclose all or any part of the contents to any other person. Thank you.

## Registration and Employment History



### Other Business Activities, continued

DUTIES: ENGAGE PROSPECTS, INTRODUCE SERVICES, CONNECT QUALIFIED BUSINESS OWNERS WITH GMG  
HOURS DEVOTED: 10 TO 15 HOURS, ZERO DURING SECURITY TRADING HOURS  
START DATE: 1/1/2017  
NON INVESTMENT OR INSURANCE RELATED

APOLLO ADVISORY INC-OWNER  
PROVIDE MARKETING ADVICE FOR ACTIVE THREAT SECURITY TECHNOLOGY TO SCHOOLS, CHURCHES, HOSPITALS AND LAW ENFORCEMENT AGENCIES  
10/15/2019  
1302 SW EVERGREEN LANE PALM CITY, FL 34990  
NON-INVESTMENT RELATED

**BLUELINE 360**  
BOARD CHAIR PERSON:DUTIES INCLUDE COMMUNITY OUTREACH CAMPAIGNS TO INCREASE SERVICE AWARENESS AND CUSTOMER BASE, CONNECTING WITH COMMUNITY LEADERS, LAW ENFORCEMENT AGENCIES, CORPORATE SPONSORS AND SAFETY ADVOCATES; RECRUITING OTHER PROFESSIONALS TO GROWTH BLUELINE'S CUSTOMER BASE AND EXPOSURE.  
NON-INVESTMENT RELATED

255AVESLIVES.ORG  
MARKETING CAMPAIGN TO ASSIST BLUELINE 360 IN PROMOTING THE BUSINESS FOR SCHOOL SECURITY SYSTEM  
1302 SW EVERGREEN LANE PALM CITY, FL 34990  
NON-INVESTMENT RELATED

**BrokerCheck Report**

**RICHARD SCOTT SHELLEY**

CRD# 2671545

<u>Section Title</u>	<u>Page(s)</u>
Report Summary	1
Broker Qualifications	2 - 3
Registration and Employment History	5 - 6

## About BrokerCheck®

BrokerCheck offers information on all current, and many former, registered securities brokers, and all current and former registered securities firms. FINRA strongly encourages investors to use BrokerCheck to check the background of securities brokers and brokerage firms before deciding to conduct, or continue to conduct, business with them.

### What is included in a BrokerCheck report?

BrokerCheck reports for individual brokers include information such as employment history, professional qualifications, disciplinary actions, criminal convictions, civil judgments and arbitration awards. BrokerCheck reports for brokerage firms include information on a firm's profile, history, and operations, as well as many of the same disclosure events mentioned above.

Please note that the information contained in a BrokerCheck report may include pending actions or allegations that may be contested, unresolved or unproven. In the end, these actions or allegations may be resolved in favor of the broker or brokerage firm, or concluded through a negotiated settlement with no admission or finding of wrongdoing.

### Where did this information come from?

The information contained in BrokerCheck comes from FINRA's Central Registration Depository, or CRD® and is a combination of:

- o information FINRA and/or the Securities and Exchange Commission (SEC) require brokers and brokerage firms to submit as part of the registration and licensing process, and
- o information that regulators report regarding disciplinary actions or allegations against firms or brokers.

### How current is this information?

Generally, active brokerage firms and brokers are required to update their professional and disciplinary information in CRD within 30 days. Under most circumstances, information reported by brokerage firms, brokers and regulators is available in BrokerCheck the next business day.

### What if I want to check the background of an investment adviser firm or investment adviser representative?

To check the background of an investment adviser firm or representative, you can search for the firm or individual in BrokerCheck. If your search is successful, click on the link provided to view the available licensing and registration information in the SEC's Investment Adviser Public Disclosure (IAPD) website at <https://www.adviserinfo.sec.gov>. In the alternative, you may search the IAPD website directly or contact your state securities regulator at <http://www.finra.org/Investors/ToolsCalculators/BrokerCheck/P455414>.

### Are there other resources I can use to check the background of investment professionals?

FINRA recommends that you learn as much as possible about an investment professional before deciding to work with them. Your state securities regulator can help you research brokers and investment adviser representatives doing business in your state.

Thank you for using FINRA BrokerCheck.



Using this site/information means that you accept the FINRA BrokerCheck Terms and Conditions. A complete list of Terms and Conditions can be found at [brokercheck.finra.org](http://brokercheck.finra.org)



For additional information about the contents of this report, please refer to the User Guidance or [www.finra.org/brokercheck](http://www.finra.org/brokercheck). It provides a glossary of terms and a list of frequently asked questions, as well as additional resources. For more information about FINRA, visit [www.finra.org](http://www.finra.org).



**RICHARD S. SHELLEY**

CRD# 2671545



## Report Summary for this Broker

Currently employed by and registered with the following Firm(s):

**B** **PACKERLAND BROKERAGE SERVICES, INC.**

1302 SW Evergreen Lane  
Palm City, FL 34990  
CRD# 37031  
Registered with this firm since: 12/16/2002

**1A** **PACKERLAND BROKERAGE SERVICES, INC.**

1302 SW Evergreen Lane  
Palm City, FL 34990  
CRD# 37031  
Registered with this firm since: 10/28/2004

This report summary provides an overview of the broker's professional background and conduct. Additional information can be found in the detailed report.

### Broker Qualifications

This broker is registered with:

- 1 Self-Regulatory Organization
- 2 U.S. states and territories

This broker has passed:

- 0 Principal/Supervisory Exams
- 2 General Industry/Product Exams
- 2 State Securities Law Exams

### Registration History

This broker was previously registered with the following securities firm(s):

**B** **HIGH MARK SECURITIES, INC.**

CRD# 42467  
LAKELAND, FL  
04/2002 - 12/2002

**B** **PACKERLAND BROKERAGE SERVICES, INC.**

CRD# 37031  
GREEN BAY, WI  
03/2000 - 04/2002

**B** **SIGNATOR INVESTORS, INC.**

CRD# 468  
BOSTON, MA  
11/1998 - 03/2000

### Disclosure Events

All individuals registered to sell securities or provide investment advice are required to disclose customer complaints and arbitrations, regulatory actions, employment terminations, bankruptcy filings, and criminal or civil judicial proceedings.

Are there events disclosed about this broker? **No**



# Broker Qualifications



## Registrations

This section provides the self-regulatory organizations (SROs) and U.S. states/territories the broker is currently registered and licensed with, the category of each license, and the date on which it became effective. This section also provides, for every brokerage firm with which the broker is currently employed, the address of each branch where the broker works.

**This individual is currently registered with 1 SRO and is licensed in 2 U.S. states and territories through his or her employer.**

### Employment 1 of 1

Firm Name: **PACKERLAND BROKERAGE SERVICES, INC.**  
Main Office Address: **432 SECURITY BLVD.  
STE. 101  
GREEN BAY, WI 54313-9709**

Firm CRD#: **37031**

SRO	Category	Status	Date
<b>B</b> FINRA	General Securities Representative	APPROVED	12/16/2002
<b>B</b> FINRA	Invest. Co and Variable Contracts	APPROVED	12/16/2002
U.S. State/Territory			
U.S. State/Territory	Category	Status	Date
<b>B</b> Florida	Agent	APPROVED	09/08/2003
<b>IA</b> Florida	Investment Adviser Representative	APPROVED	10/28/2004
<b>B</b> Massachusetts	Agent	APPROVED	11/28/2007

## Branch Office Locations

**PACKERLAND BROKERAGE SERVICES, INC.**  
1302 SW Evergreen Lane  
Palm City, FL 34990

## Broker Qualifications



### Industry Exams this Broker has Passed

This section includes all securities industry exams that the broker has passed. Under limited circumstances, a broker may attain a registration after receiving an exam waiver based on exams the broker has passed and/or qualifying work experience. Any exam waivers that the broker has received are not included below.

**This individual has passed 0 principal/supervisory exams, 2 general industry/product exams, and 2 state securities law exams.**

### Principal/Supervisory Exams

Exam	Category	Date
No information reported.		

### General Industry/Product Exams

Exam	Category	Date
<b>B</b> Securities Industry Essentials Examination	SIE	10/01/2018
<b>B</b> General Securities Representative Examination	Series 7	01/12/1996

### State Securities Law Exams

Exam	Category	Date
<b>IA</b> Uniform Investment Adviser Law Examination	Series 65	10/22/2004
<b>B</b> Uniform Securities Agent State Law Examination	Series 63	01/22/1996

Additional information about the above exams or other exams FINRA administers to brokers and other securities professionals can be found at [www.finra.org/brokerqualifications/registeredrep/](http://www.finra.org/brokerqualifications/registeredrep/).

## Broker Qualifications

### Professional Designations



This section details that the representative has reported **0** professional designation(s).

No information reported.



## Registration and Employment History



### Registration History

The broker previously was registered with the following firms:

Registration Dates	Firm Name	CRD#	Branch Location
<b>B</b> 04/2002 - 12/2002	HIGH MARK SECURITIES, INC.	42467	LAKELAND, FL
<b>B</b> 03/2000 - 04/2002	PACKERLAND BROKERAGE SERVICES, INC.	37031	GREEN BAY, WI
<b>B</b> 11/1998 - 03/2000	SIGNATOR INVESTORS, INC.	468	BOSTON, MA
<b>B</b> 05/1997 - 02/1998	GRUNTAL & CO., L.L.C.	372	NEW YORK, NY
<b>B</b> 11/1996 - 04/1997	CAPITAL INTERNATIONAL SECURITIES GROUP, INC.	29771	MIAMI, FL
<b>B</b> 03/1996 - 10/1996	JOSEPH ROBERTS & CO., INC.	15971	POMPANO BEACH, FL

### Employment History

This section provides up to 10 years of an individual broker's employment history as reported by the individual broker on the most recently filed Form U4.

**Please note that the broker is required to provide this information only while registered with FINRA or a national securities exchange and the information is not updated via Form U4 after the broker ceases to be registered. Therefore, an employment end date of "Present" may not reflect the broker's current employment status.**

Employment	Employer Name	Position	Investment Related	Employer Location
12/2002 - Present	PACKERLAND BROKERAGE SERVICES, INC.	REGISTERED REPRESENTATIVE	Y	GREEN BAY, WI, United States

### Other Business Activities

This section includes information, if any, as provided by the broker regarding other business activities the broker is currently engaged in either as a proprietor, partner, officer, director, employee, trustee, agent or otherwise. This section does not include non-investment related activity that is exclusively charitable, civic, religious or fraternal and is recognized as tax exempt.

1) RSM FINANCIAL RISK MGMT, LLC. LAKEWORTH, FL.  
 INSURANCE SALES, 10 PLUS HOURS A MONTH TIME DEVOTED. START DATE 12/1999. LIFE, HEALTH, FIXED & INDEXED ANNUITIES, LTC, DI. APPT. WITH VARIOUS COMPANIES. INVESTMENT RELATED.

2) STRYDE/GMG  
 1100 TOREY ROAD FENTON, MI 48430  
 TITLE: INDEPENDENT CONSULTANT

**End of Report**



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Exhibit #7

SunBiz.org Division of Corporations Entity

Annual Reports

For

Blueline 360, Inc.

&

Apollo Advisory Inc.



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

## Detail by Entity Name

Florida Profit Corporation

**BLUELINE 360, INC.**

### Filing Information

<b>Document Number</b>	P18000102038
<b>FEI/EIN Number</b>	83-2899549
<b>Date Filed</b>	12/18/2018
<b>Effective Date</b>	12/18/2018
<b>State</b>	FL
<b>Status</b>	ACTIVE
<b>Last Event</b>	REINSTATEMENT
<b>Event Date Filed</b>	09/28/2020

### Principal Address

1 East Ocean Ave,  
#216  
Stuart, FL 34994

Changed: 09/28/2020

### Mailing Address

1 East Ocean Blvd  
Stuart, FL 34994

Changed: 09/28/2020

### Registered Agent Name & Address

**WEBBER, GLENN**  
101 SE Ocean Blvd.  
Stuart, FL 34994

Name Changed: 09/28/2020

Address Changed: 09/28/2020

### Officer/Director Detail

#### **Name & Address**

Title CEO

**BILLIG, JAMES R**  
1 East Ocean Ave,

Stuart, FL 34994

Title CMO

MURRAY, PAUL G  
1 East Ocean Ave,  
Stuart, FL 34994

Title CFO

PRINCE, ROBERT A  
1 East Ocean Blvd,  
Stuart, FL 34994

Title COO

HENDRICKS, GREGG  
1 East Ocean Blvd  
Stuart, FL 34994

**Annual Reports**

<b>Report Year</b>	<b>Filed Date</b>
2019	03/06/2019
2020	09/28/2020

**Document Images**

<a href="#">09/28/2020 -- REINSTATEMENT</a>	<a href="#">View image in PDF format</a>
<a href="#">03/06/2019 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">12/18/2018 -- Domestic Profit</a>	<a href="#">View image in PDF format</a>

**2020 FLORIDA PROFIT CORPORATION REINSTATEMENT**

DOCUMENT# P18000102038

**FILED**  
**Sep 28, 2020**  
**Secretary of State**  
**1108077678CR**

**Entity Name: BLUELINE 360, INC.**

**Current Principal Place of Business:**

1 EAST OCEAN AVE,  
#216  
STUART, FL 34994

**Current Mailing Address:**

1 EAST OCEAN BLVD  
STUART, FL 34994 US

**FEI Number: 83-2899549**

**Certificate of Status Desired: No**

**Name and Address of Current Registered Agent:**

**WEBBER, GLENN**  
101 SE OCEAN BLVD.  
STUART, FL 34994 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

**SIGNATURE: GLENN WEBBER**

**09/28/2020**

Electronic Signature of Registered Agent

Date

**Officer/Director Detail :**

Title CEO  
Name BILLIG, JAMES R  
Address 1 EAST OCEAN AVE,  
City-State-Zip: STUART FL 34994

Title CMO  
Name MURRAY, PAUL G  
Address 1 EAST OCEAN AVE,  
City-State-Zip: STUART FL 34994

Title CFO  
Name PRINCE, ROBERT A  
Address 1 EAST OCEAN BLVD,  
City-State-Zip: STUART FL 34994

Title COO  
Name HENDRICKS, GREGG  
Address 1 EAST OCEAN BLVD  
City-State-Zip: STUART FL 34994

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 607, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

**SIGNATURE: JAMES BILLIG**

**CEO**

**09/28/2020**

Electronic Signature of Signing Officer/Director Detail

Date



**2019 FLORIDA PROFIT CORPORATION ANNUAL REPORT**

DOCUMENT# P18000102038

Entity Name: **BLUELINE 360, INC.**

**Current Principal Place of Business:**

11718 SE FEDERAL HIGHWAY  
#216  
HOBE SOUND, FL 33455

**FILED**  
**Mar 06, 2019**  
**Secretary of State**  
**6995891847CC**

**Current Mailing Address:**

11718 SE FEDERAL HIGHWAY  
#216  
HOBE SOUND, FL 33455 US

FEI Number: **83-2899549**

Certificate of Status Desired: No

**Name and Address of Current Registered Agent:**

**OGDEN, DERRECK W**  
11718 SE FEDERAL HIGHWAY  
#216  
HOBE SOUND, FL 33455 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

SIGNATURE:

\_\_\_\_\_  
Electronic Signature of Registered Agent

\_\_\_\_\_  
Date

**Officer/Director Detail :**

Title O  
Name BILLIG, JAMES R  
Address 6517 SE BROADMOOR  
City-State-Zip: STUART FL 34997

Title O  
Name MURRAY, PAUL G  
Address 130 TALLOW TRAIL  
City-State-Zip: JUPITER FL 33458

Title O  
Name OGDEN, DERRECK W  
Address 511 SE HIBISCUS AVENUE  
City-State-Zip: STUART FL 34996

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 607, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

SIGNATURE: DERRECK OGDEN

PRESIDENT

03/06/2019

\_\_\_\_\_  
Electronic Signature of Signing Officer/Director Detail

\_\_\_\_\_  
Date

**Electronic Articles of Incorporation  
For**

P18000102038  
FILED  
December 18, 2018  
Sec. Of State  
crico

**BLUELINE 360, INC.**

The undersigned incorporator, for the purpose of forming a Florida profit corporation, hereby adopts the following Articles of Incorporation:

**Article I**

The name of the corporation is:  
BLUELINE 360, INC.

**Article II**

The principal place of business address:  
11718 SE FEDERAL HIGHWAY  
#216  
HOBE SOUND, FL. US 33455

The mailing address of the corporation is:  
11718 SE FEDERAL HIGHWAY  
#216  
HOBE SOUND, FL. US 33455

**Article III**

The purpose for which this corporation is organized is:  
ANY AND ALL LAWFUL BUSINESS.

**Article IV**

The number of shares the corporation is authorized to issue is:  
30000

**Article V**

The name and Florida street address of the registered agent is:  
DERRECK W OGDEN  
11718 SE FEDERAL HIGHWAY  
#216  
HOBE SOUND, FL. 33455

I certify that I am familiar with and accept the responsibilities of registered agent.

Registered Agent Signature: DERRECK OGDEN

P18000102038  
FILED  
December 18, 2018  
Sec. Of State  
crico

## Article VI

The name and address of the incorporator is:

DERRECK OGDEN  
11718 SE FEDERAL HIGHWAY  
#216  
HOBE SOUND, FL 33455

Electronic Signature of Incorporator: DERRECK OGDEN

I am the incorporator submitting these Articles of Incorporation and affirm that the facts stated herein are true. I am aware that false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S. I understand the requirement to file an annual report between January 1st and May 1st in the calendar year following formation of this corporation and every year thereafter to maintain "active" status.

## Article VII

The initial officer(s) and/or director(s) of the corporation is/are:

Title: O  
JAMES R BILLIG  
6517 SE BROADMOOR  
STUART, FL. 34997 US

Title: O  
PAUL G MURRAY  
130 TALLOW TRAIL  
JUPITER, FL. 33458 US

Title: O  
DERRECK W OGDEN  
511 SE HIBISCUS AVENUE  
STUART, FL. 34996 US

## Article VIII

The effective date for this corporation shall be:

12/18/2018



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

## Detail by Entity Name

Florida Profit Corporation  
APOLLO ADVISORY INCORPORATED

### Filing Information

**Document Number** P09000023702  
**FEI/EIN Number** 26-4545913  
**Date Filed** 03/13/2009  
**State** FL  
**Status** ACTIVE

### Principal Address

1302 SW Evergreen Lane  
Palm City, FL 34990

Changed: 04/21/2016

### Mailing Address

1302 SW Evergreen Lane  
Palm City, FL 34990

Changed: 04/21/2016

### Registered Agent Name & Address

SHELLEY, SCOTT PSD  
1302 SW Evergreen Lane  
Palm City, FL 34990

Name Changed: 02/16/2010

Address Changed: 04/21/2016

### Officer/Director Detail

#### **Name & Address**

Title PSD

SHELLEY, R. SCOTT  
1302 SW Evergreen Lane  
Palm City, FL 34990

### Annual Reports

Report Year	Filed Date
-------------	------------



2018	04/30/2018
2019	04/29/2019
2020	04/20/2020

**Document Images**

<a href="#">04/20/2020 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">04/29/2019 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">04/30/2018 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">04/29/2017 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">04/21/2016 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">04/30/2015 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">04/30/2014 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">04/12/2013 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">04/13/2012 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">04/19/2011 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">02/16/2010 -- ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">03/13/2009 -- Domestic Profit</a>	<a href="#">View image in PDF format</a>

**2020 FLORIDA PROFIT CORPORATION ANNUAL REPORT**

DOCUMENT# P09000023702

Entity Name: **APOLLO ADVISORY INCORPORATED**

**Current Principal Place of Business:**

1302 SW EVERGREEN LANE  
PALM CITY, FL 34990

**Current Mailing Address:**

1302 SW EVERGREEN LANE  
PALM CITY, FL 34990 US

FEI Number: 26-4545913

Certificate of Status Desired: No

**Name and Address of Current Registered Agent:**

**SHELLEY, SCOTT PSD**  
1302 SW EVERGREEN LANE  
PALM CITY, FL 34990 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

SIGNATURE:

\_\_\_\_\_  
Electronic Signature of Registered Agent

\_\_\_\_\_  
Date

**Officer/Director Detail :**

Title PSD  
Name SHELLEY, R. SCOTT  
Address 1302 SW EVERGREEN LANE  
City-State-Zip: PALM CITY FL 34990

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 607, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

SIGNATURE: R. SCOTT SHELLEY

PRES

04/20/2020

\_\_\_\_\_  
Electronic Signature of Signing Officer/Director Detail

\_\_\_\_\_  
Date

**2019 FLORIDA PROFIT CORPORATION ANNUAL REPORT**

DOCUMENT# P09000023702

**Entity Name:** APOLLO ADVISORY INCORPORATED

**Current Principal Place of Business:**

1302 SW EVERGREEN LANE  
PALM CITY, FL 34990

**Current Mailing Address:**

1302 SW EVERGREEN LANE  
PALM CITY, FL 34990 US

**FEI Number:** 26-4545913

**Certificate of Status Desired:** No

**Name and Address of Current Registered Agent:**

SHELLEY, SCOTT PSD  
1302 SW EVERGREEN LANE  
PALM CITY, FL 34990 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

**SIGNATURE:**

\_\_\_\_\_  
Electronic Signature of Registered Agent

\_\_\_\_\_  
Date

**Officer/Director Detail :**

Title PSD  
Name SHELLEY, R. SCOTT  
Address 1302 SW EVERGREEN LANE  
City-State-Zip: PALM CITY FL 34990

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 607, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

**SIGNATURE:** SHELLEY , R. SCOTT

**PRESIDENT**

**04/29/2019**

\_\_\_\_\_  
Electronic Signature of Signing Officer/Director Detail

\_\_\_\_\_  
Date

**2018 FLORIDA PROFIT CORPORATION ANNUAL REPORT**

DOCUMENT# P09000023702

**FILED**  
**Apr 30, 2018**  
**Secretary of State**  
**CC5720134546**

**Entity Name:** APOLLO ADVISORY INCORPORATED

**Current Principal Place of Business:**

1302 SW EVERGREEN LANE  
PALM CITY, FL 34990

**Current Mailing Address:**

1302 SW EVERGREEN LANE  
PALM CITY, FL 34990 US

**FEI Number:** 26-4545913

**Certificate of Status Desired:** No

**Name and Address of Current Registered Agent:**

SHELLEY, SCOTT PSD  
1302 SW EVERGREEN LANE  
PALM CITY, FL 34990 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

**SIGNATURE:**

\_\_\_\_\_  
Electronic Signature of Registered Agent

\_\_\_\_\_  
Date

**Officer/Director Detail :**

Title PSD  
Name SHELLEY, R. SCOTT  
Address 1302 SW EVERGREEN LANE  
City-State-Zip: PALM CITY FL 34990

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 607, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

**SIGNATURE:** R. SCOTT SHELLEY

**PRESIDENT**

**04/30/2018**

\_\_\_\_\_  
Electronic Signature of Signing Officer/Director Detail

\_\_\_\_\_  
Date



**2017 FLORIDA PROFIT CORPORATION ANNUAL REPORT**

DOCUMENT# P09000023702

**Entity Name:** APOLLO ADVISORY INCORPORATED

**FILED**  
**Apr 29, 2017**  
**Secretary of State**  
**CC9571413706**

**Current Principal Place of Business:**

1302 SW EVERGREEN LANE  
PALM CITY, FL 34990

**Current Mailing Address:**

1302 SW EVERGREEN LANE  
PALM CITY, FL 34990 US

**FEI Number:** 26-4545913

**Certificate of Status Desired:** No

**Name and Address of Current Registered Agent:**

SHELLEY, SCOTT PSD  
1302 SW EVERGREEN LANE  
PALM CITY, FL 34990 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

**SIGNATURE:**

\_\_\_\_\_  
Electronic Signature of Registered Agent

\_\_\_\_\_  
Date

**Officer/Director Detail :**

Title PSD  
Name SHELLEY, R. SCOTT  
Address 1302 SW EVERGREEN LANE  
City-State-Zip: PALM CITY FL 34990

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 607, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

**SIGNATURE:** R. SCOTT SHELLEY

**PRES**

**04/29/2017**

\_\_\_\_\_  
Electronic Signature of Signing Officer/Director Detail

\_\_\_\_\_  
Date

**2016 FLORIDA PROFIT CORPORATION ANNUAL REPORT**

DOCUMENT# P09000023702

**FILED**  
**Apr 21, 2016**  
**Secretary of State**  
**CC9754045839**

**Entity Name:** APOLLO ADVISORY INCORPORATED

**Current Principal Place of Business:**

1302 SW EVERGREEN LANE  
PALM CITY, FL 34990

**Current Mailing Address:**

1302 SW EVERGREEN LANE  
PALM CITY, FL 34990 US

**FEI Number:** 26-4545913

**Certificate of Status Desired:** No

**Name and Address of Current Registered Agent:**

SHELLEY, SCOTT PSD  
1302 SW EVERGREEN LANE  
PALM CITY, FL 34990 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

**SIGNATURE:**

\_\_\_\_\_  
Electronic Signature of Registered Agent

\_\_\_\_\_  
Date

**Officer/Director Detail :**

Title PSD  
Name SHELLEY, R. SCOTT  
Address 1302 SW EVERGREEN LANE  
City-State-Zip: PALM CITY FL 34990

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 607, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

**SIGNATURE:** R. SCOTT SHELLEY

**PRESIDENT**

**04/21/2016**

\_\_\_\_\_  
Electronic Signature of Signing Officer/Director Detail

\_\_\_\_\_  
Date

**2015 FLORIDA PROFIT CORPORATION ANNUAL REPORT**

DOCUMENT# P09000023702

**Entity Name:** APOLLO ADVISORY INCORPORATED

**Current Principal Place of Business:**

1224 NORTH C STREET  
LAKE WORTH, FL 33460

**Current Mailing Address:**

1224 NORTH C STREET  
LAKE WORTH, FL 33460

**FEI Number:** 26-4545913

**Certificate of Status Desired:** No

**Name and Address of Current Registered Agent:**

SHELLEY, SCOTT PSD  
1224 NORTH C STREET  
LAKE WORTH, FL 33460 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

**SIGNATURE:**

\_\_\_\_\_  
Electronic Signature of Registered Agent

\_\_\_\_\_  
Date

**Officer/Director Detail :**

Title PSD  
Name SHELLEY, R. SCOTT  
Address 1224 NORTH C STREET  
City-State-Zip: LAKE WORTH FL 33460

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 607, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

**SIGNATURE:** R. SCOTT SHELLEY

**PRES**

**04/30/2015**

\_\_\_\_\_  
Electronic Signature of Signing Officer/Director Detail

\_\_\_\_\_  
Date

**2014 FLORIDA PROFIT CORPORATION ANNUAL REPORT**

DOCUMENT# P09000023702

**Entity Name:** APOLLO ADVISORY INCORPORATED

**Current Principal Place of Business:**

1224 NORTH C STREET  
LAKE WORTH, FL 33460

**Current Mailing Address:**

1224 NORTH C STREET  
LAKE WORTH, FL 33460

**FEI Number:** 26-4545913

**Certificate of Status Desired:** No

**Name and Address of Current Registered Agent:**

SHELLEY, SCOTT PSD  
1224 NORTH C STREET  
LAKE WORTH, FL 33460 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

**SIGNATURE:**

\_\_\_\_\_  
Electronic Signature of Registered Agent

\_\_\_\_\_  
Date

**Officer/Director Detail :**

Title PSD  
Name SHELLEY, R. SCOTT  
Address 1224 NORTH C STREET  
City-State-Zip: LAKE WORTH FL 33460

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 607, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

**SIGNATURE:** R. SCOTT SHELLEY

**PRESIDENT**

**04/30/2014**

\_\_\_\_\_  
Electronic Signature of Signing Officer/Director Detail

\_\_\_\_\_  
Date



**2013 FLORIDA PROFIT CORPORATION ANNUAL REPORT**

DOCUMENT# P09000023702

Entity Name: **APOLLO ADVISORY INCORPORATED**

**Current Principal Place of Business:**

1224 NORTH C STREET  
LAKE WORTH, FL 33460

**Current Mailing Address:**

1224 NORTH C STREET  
LAKE WORTH, FL 33460

FEI Number: 26-4545913

Certificate of Status Desired: No

**Name and Address of Current Registered Agent:**

**SHELLEY, SCOTT PSD**  
1224 NORTH C STREET  
LAKE WORTH, FL 33460 US

*The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.*

SIGNATURE: \_\_\_\_\_

Electronic Signature of Registered Agent

\_\_\_\_\_ Date

**Officer/Director Detail :**

Title PSD  
Name SHELLEY, R. SCOTT  
Address 1224 NORTH C STREET  
City-State-Zip: LAKE WORTH FL 33460

*I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 607, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.*

SIGNATURE: R. SCOTT SHELLEY

PSD

04/12/2013

\_\_\_\_\_ Electronic Signature of Signing Officer/Director Detail

\_\_\_\_\_ Date

**2012 FOR PROFIT CORPORATION ANNUAL REPORT**

DOCUMENT# P09000023702

FILED  
Apr 13, 2012  
Secretary of State

Entity Name: APOLLO ADVISORY INCORPORATED

**Current Principal Place of Business:**

1224 NORTH C STREET  
LAKE WORTH, FL 33460

**New Principal Place of Business:**

**Current Mailing Address:**

1224 NORTH C STREET  
LAKE WORTH, FL 33460

**New Mailing Address:**

FEI Number: 26-4545913

FEI Number Applied For ( )

FEI Number Not Applicable ( )

Certificate of Status Desired ( )

**Name and Address of Current Registered Agent:**

SHELLEY, SCOTT PSD  
1224 NORTH C STREET  
LAKE WORTH, FL 33460 US

**Name and Address of New Registered Agent:**

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: \_\_\_\_\_

Electronic Signature of Registered Agent

\_\_\_\_\_ Date

**OFFICERS AND DIRECTORS:**

Title: PSD  
Name: SHELLEY, R. SCOTT  
Address: 1224 NORTH C STREET  
City-St-Zip: LAKE WORTH, FL 33460

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 607, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: R SCOTT SHELLEY

PRES

04/13/2012

Electronic Signature of Signing Officer or Director

\_\_\_\_\_ Date

**2012 FOR PROFIT CORPORATION ANNUAL REPORT**

DOCUMENT# P09000023702

**FILED**  
**Apr 13, 2012**  
**Secretary of State**

**Entity Name:** APOLLO ADVISORY INCORPORATED

**Current Principal Place of Business:**

1224 NORTH C STREET  
LAKE WORTH, FL 33460

**New Principal Place of Business:**

**Current Mailing Address:**

1224 NORTH C STREET  
LAKE WORTH, FL 33460

**New Mailing Address:**

**FEI Number:** 26-4545913

**FEI Number Applied For ( )**

**FEI Number Not Applicable ( )**

**Certificate of Status Desired ( )**

**Name and Address of Current Registered Agent:**

SHELLEY, SCOTT PSD  
1224 NORTH C STREET  
LAKE WORTH, FL 33460 US

**Name and Address of New Registered Agent:**

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: \_\_\_\_\_

Electronic Signature of Registered Agent

\_\_\_\_\_ Date

**OFFICERS AND DIRECTORS:**

**Title:** PSD  
**Name:** SHELLEY, R. SCOTT  
**Address:** 1224 NORTH C STREET  
**City-St-Zip:** LAKE WORTH, FL 33460

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 607, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: R SCOTT SHELLEY

PRES

04/13/2012

Electronic Signature of Signing Officer or Director

Date

# 2011 FOR PROFIT CORPORATION ANNUAL REPORT

DOCUMENT# P09000023702

Entity Name: APOLLO ADVISORY INCORPORATED

FILED  
Apr 19, 2011  
Secretary of State

**Current Principal Place of Business:**

1224 NORTH C STREET  
LAKE WORTH, FL 33460

**New Principal Place of Business:**

**Current Mailing Address:**

1224 NORTH C STREET  
LAKE WORTH, FL 33460

**New Mailing Address:**

FEI Number: 26-4545913

FEI Number Applied For ( )

FEI Number Not Applicable ( )

Certificate of Status Desired ( )

**Name and Address of Current Registered Agent:**

SHELLEY, SCOTT PSD  
1224 NORTH C STREET  
LAKE WORTH, FL 33460 US

**Name and Address of New Registered Agent:**

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: \_\_\_\_\_

Electronic Signature of Registered Agent

\_\_\_\_\_ Date

**OFFICERS AND DIRECTORS:**

Title: PSD  
Name: SHELLEY, R. SCOTT  
Address: 1224 NORTH C STREET  
City-St-Zip: LAKE WORTH, FL 33460

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 607, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: R. SCOTT SHELLEY

Electronic Signature of Signing Officer or Director

OWNE

04/19/2011

Date



**2011 FOR PROFIT CORPORATION ANNUAL REPORT**

DOCUMENT# P09000023702

**FILED**  
**Apr 19, 2011**  
**Secretary of State**

**Entity Name:** APOLLO ADVISORY INCORPORATED

**Current Principal Place of Business:**

1224 NORTH C STREET  
LAKE WORTH, FL 33460

**New Principal Place of Business:**

**Current Mailing Address:**

1224 NORTH C STREET  
LAKE WORTH, FL 33460

**New Mailing Address:**

**FEI Number:** 26-4545913      **FEI Number Applied For ( )**      **FEI Number Not Applicable ( )**      **Certificate of Status Desired ( )**

**Name and Address of Current Registered Agent:**

SHELLEY, SCOTT PSD  
1224 NORTH C STREET  
LAKE WORTH, FL 33460      US

**Name and Address of New Registered Agent:**

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: \_\_\_\_\_

Electronic Signature of Registered Agent

\_\_\_\_\_ Date

**OFFICERS AND DIRECTORS:**

**Title:** PSD  
**Name:** SHELLEY, R. SCOTT  
**Address:** 1224 NORTH C STREET  
**City-St-Zip:** LAKE WORTH, FL 33460

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 607, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: R. SCOTT SHELLEY

OWNE

04/19/2011

Electronic Signature of Signing Officer or Director

Date

# 2010 FOR PROFIT CORPORATION ANNUAL REPORT

DOCUMENT# P09000023702

FILED  
Feb 16, 2010  
Secretary of State

Entity Name: APOLLO ADVISORY INCORPORATED

**Current Principal Place of Business:**

1224 NORTH C STREET  
LAKE WORTH, FL 33460

**New Principal Place of Business:**

**Current Mailing Address:**

1224 NORTH C STREET  
LAKE WORTH, FL 33460

**New Mailing Address:**

FEI Number: 26-4545913

FEI Number Applied For ( )

FEI Number Not Applicable ( )

Certificate of Status Desired ( )

**Name and Address of Current Registered Agent:**

SPIEGEL & UTRERA, P.A.  
1840 SW 22ND ST.  
4TH FLOOR  
MIAMI, FL 33145 US

**Name and Address of New Registered Agent:**

SHELLEY, SCOTT PSD  
1224 NORTH C STREET  
LAKE WORTH, FL 33460 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: R. SCOTT SHELLEY

02/16/2010

Electronic Signature of Registered Agent

Date

Election Campaign Financing Trust Fund Contribution ( ).

**OFFICERS AND DIRECTORS:**

Title: PSD  
Name: SHELLEY, R. SCOTT  
Address: 1224 NORTH C STREET  
City-St-Zip: LAKE WORTH, FL 33460

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 607, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: R SCOTT SHELLEY

PSD

02/16/2010

Electronic Signature of Signing Officer or Director

Date

PD90000 23702

(Requestor's Name)

(Address)

(Address)

(City/State/Zip/Phone #)

PICK-UP  WAIT  MAIL

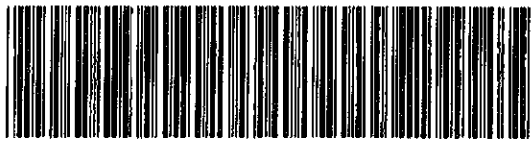
(Business Entity Name)

(Document Number)

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DIVISION OF CORPORATIONS  
TALLAHASSEE, FLORIDA

FILED  
09 MAR 13 PM 12:04  
SECRETARY OF STATE  
TALLAHASSEE, FLORIDA

**SPIEGEL & UTRERA, P.A.**

(Requestor's Name)

**1840 SOUTHWEST 22ND STREET, 4TH FLOOR**

**MIAMI, FL 33145 - (305) 854-6000**

OFFICE USE ONLY

**CORPORATION NAME(S) & DOCUMENT NUMBER(S) (if known):**

1. **APOLLO ADVISORY INCORPORATED**  
(Corporation Name) (Document #)
2. \_\_\_\_\_  
(Corporation Name) (Document #)
3. \_\_\_\_\_  
(Corporation Name) (Document #)
4. \_\_\_\_\_  
(Corporation Name) (Document #)

- Walk-In   
  Pick up time \_\_\_\_\_   
  Certified Copy  
 Mail out   
  Will wait   
  Photocopy   
  Certificate of Status

**NEW FILINGS**

Profit
NonProfit
Limited Liability
Domestication
Other

**AMENDMENTS**

Amendment
Resignation of R.A., Officer/Director
Change of Registered Agent
Dissolution/Withdrawal
Merger

**OTHER FILINGS**

Annual Report
Fictitious Name
Name Reservation

**REGISTRATION/QUALIFICATION**

Foreign
Limited Partnership
Reinstatement
Trademark
Other

Examiner's Initials



**ARTICLES OF INCORPORATION**  
**OF**  
**APOLLO ADVISORY INCORPORATED**

The undersigned subscriber to these Articles of Incorporation is a natural person competent to contract and hereby form a Corporation for profit under Chapter 607 of the Florida Statutes.

**ARTICLE 1 - NAME**

The name of the Corporation is **APOLLO ADVISORY INCORPORATED**, (hereinafter, "Corporation").

**ARTICLE 2 - PURPOSE OF CORPORATION**

The Corporation shall engage in any activity or business permitted under the laws of the United States and of the State of Florida.

**ARTICLE 3 - PRINCIPAL OFFICE**

The address of the principal office of this Corporation is 1224 North C Street, Lake Worth, Florida 33460 and the mailing address is the same.

**ARTICLE 4 - INCORPORATOR**

The name and street address of the incorporator of this Corporation is:

Elsie Sanchez  
1840 Southwest 22nd Street, 4th Floor  
Miami, Florida 33145

**ARTICLE 5 - OFFICERS**

The officers of the Corporation shall be:

President:	R. Scott Shelley
Secretary:	R. Scott Shelley

whose mailing addresses shall be the same as the principal office of the Corporation.

09 MAR 13 PM 12:04  
FILED  
SECRETARY OF STATE  
TALLAHASSEE, FLORIDA



**SPIEGEL & UTRERA, P.A.**

LAWYERS  
[www.amerilawyer.com](http://www.amerilawyer.com)

1840 CORAL WAY, 4TH FLOOR, MIAMI, FL 33145 - (305) 854-6000 - (800) 603-3900 - FACSIMILE (305) 860-2076

**ARTICLE 6 - DIRECTOR(S)**

The Director(s) of the Corporation shall be:

R. Scott Shelley

whose mailing addresses shall be the same as the principal office of the Corporation.

**ARTICLE 7 - CORPORATE CAPITALIZATION**

7.1 The maximum number of shares that this Corporation is authorized to have outstanding at any time is **TEN THOUSAND (10,000)** shares of common stock, each share having the par value of **ONE CENT (\$.01)**.

7.2 All holders of shares of common stock shall be identical with each other in every respect and the holders of common shares shall be entitled to have unlimited voting rights on all shares and be entitled to one vote for each share on all matters on which Shareholders have the right to vote.

7.3 All holders of shares of common stock, upon the dissolution of the Corporation, shall be entitled to receive the net assets of the Corporation.

7.4 No holder of shares of stock of any class shall have any preemptive right to subscribe to or purchase any additional shares of any class, or any bonds or convertible securities of any nature; provided, however, that the Board of Director(s) may, in authorizing the issuance of shares of stock of any class, confer any preemptive right that the Board of Director(s) may deem advisable in connection with such issuance.

7.5 The Board of Director(s) of the Corporation may authorize the issuance from time to time of shares of its stock of any class, whether now or hereafter authorized, or securities convertible into shares of its stock of any class, whether now or hereafter authorized, for such consideration as the Board of Director(s) may deem advisable, subject to such restrictions or limitations, if any, as may be set forth in the bylaws of the Corporation.

7.6 The Board of Director(s) of the Corporation may, by Restated Articles of Incorporation, classify or reclassify any unissued stock from time to time by setting or changing the preferences, conversions or other rights, voting powers, restrictions, limitations as to dividends, qualifications, or term or conditions of redemption of the stock.



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### **ARTICLE 8 - SUB-CHAPTER S CORPORATION**

The Corporation may elect to be an S Corporation, as provided in Sub-Chapter S of the Internal Revenue Code of 1986, as amended.

8.1 The shareholders of this Corporation may elect and, if elected, shall continue such election to be an S Corporation as provided in Sub-Chapter S of the Internal Revenue Code of 1986, as amended, unless the shareholders of the Corporation unanimously agree otherwise in writing.

8.2 After this Corporation has elected to be an S Corporation, none of the shareholders of this Corporation, without the written consent of all the shareholders of this Corporation shall take any action, or make any transfer or other disposition of the shareholders' shares of stock in the Corporation, which will result in the termination or revocation of such election to be an S Corporation, as provided in Sub-chapter S of the Internal Revenue Code of 1986, as amended.

8.3 Once the Corporation has elected to be an S Corporation, each share of stock issued by this Corporation shall contain the following legend:

"The shares of stock represented by this certificate cannot be transferred if such transfer would void the election of the Corporation to be taxed under Sub-Chapter S of the Internal Revenue Code of 1986, as amended."

### **ARTICLE 9 - SHAREHOLDERS' RESTRICTIVE AGREEMENT**

All of the shares of stock of this Corporation may be subject to a Shareholders' Restrictive Agreement containing numerous restrictions on the rights of shareholders of the Corporation and transferability of the shares of stock of the Corporation. A copy of the Shareholders' Restrictive Agreement, if any, is on file at the principal office of the Corporation.

### **ARTICLE 10 - POWERS OF CORPORATION**

The Corporation shall have the same powers as an individual to do all things necessary or convenient to carry out its business and affairs, subject to any limitations or restrictions imposed by applicable law or these Articles of Incorporation.

### **ARTICLE 11 - TERM OF EXISTENCE**

This Corporation shall have perpetual existence.



**SPIEGEL & UTRERA, P.A.**

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**ARTICLE 12 - REGISTERED OWNER(S)**

The Corporation, to the extent permitted by law, shall be entitled to treat the person in whose name any share or right is registered on the books of the Corporation as the owner thereto, for all purposes, and except as may be agreed in writing by the Corporation, the Corporation shall not be bound to recognize any equitable or other claim to, or interest in, such share or right on the part of any other person, whether or not the Corporation shall have notice thereof.

**ARTICLE 13 - REGISTERED OFFICE AND REGISTERED AGENT**

The initial address of registered office of this Corporation is Spiegel & Utrera, P.A., located at 1840 Southwest 22nd Street, 4th Floor, Miami, Florida 33145. The name and address of the registered agent of this Corporation is Spiegel & Utrera, P.A., 1840 Southwest 22nd Street, 4th Floor, Miami, Florida 33145.

**ARTICLE 14 - BYLAWS**

The Board of Director(s) of the Corporation shall have power, without the assent or vote of the shareholders, to make, alter, amend or repeal the Bylaws of the Corporation, but the affirmative vote of a number of Directors equal to a majority of the number who would constitute a full Board of Director(s) at the time of such action shall be necessary to take any action for the making, alteration, amendment or repeal of the Bylaws.

**ARTICLE 15 - EFFECTIVE DATE**

These Articles of Incorporation shall be effective immediately upon approval of the Secretary of State, State of Florida.

**ARTICLE 16 - AMENDMENT**

The Corporation reserves the right to amend, alter, change or repeal any provision contained in these Articles of Incorporation, or in any amendment hereto, or to add any provision to these Articles of Incorporation or to any amendment hereto, in any manner now or hereafter prescribed or permitted by the provisions of any applicable statute of the State of Florida, and all rights conferred upon shareholders in these Articles of Incorporation or any amendment hereto are granted subject to this reservation.



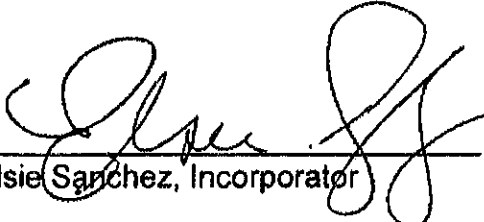
**SPIEGEL & UTRERA, P.A.**

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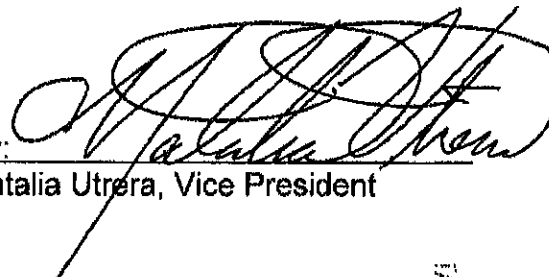
IN WITNESS WHEREOF, I have hereunto set my hand and seal, acknowledged and filed the foregoing Articles of Incorporation under the laws of the State of Florida, this \_\_\_\_\_.

  
Elsie Sanchez, Incorporator

**ACCEPTANCE OF REGISTERED AGENT DESIGNATED  
IN ARTICLES OF INCORPORATION**

Spiegel & Utrera, P.A., having a business office identical with the registered office of the Corporation name above, and having been designated as the Registered Agent in the above and foregoing Articles of Incorporation, is familiar with and accepts the obligations of the position of Registered Agent under the applicable provisions of the Florida Statutes.

Spiegel & Utrera, P.A.

By:   
Natalia Utrera, Vice President

FILED  
09 MAR 13 PM 12:04  
CLERK OF STATE  
TALLAHASSEE, FLORIDA



**SPIEGEL & UTRERA, P.A.**  
LAWYERS

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1840 CORAL WAY, 4<sup>TH</sup> FLOOR, MIAMI, FLORIDA 33145 - (305) 854-6000 - (800) 603-3900 - FACSIMILE (305) 857-3700

Exhibit #8

July 16, 2020, Email Response

From

Daniel Rishavy

July 16, 2020

Robert Sheppard

Investigator/Auditor (SRI)

Palm Beach School District Office of the Inspector General

3318 Forest Hill Blvd. C-306

West Palm Beach, FL 33406

(via email)

Dear Mr. Sheppard,

In response to an allegation appearing to suggest that I used my position at Edu-Link to inappropriately direct funds to an entity controlled by me, I will swear under oath, and I know that it can be proven, that I never directed any payments to be made from any Palm Beach Maritime Academy school funds to any entity that was not authorized by the agreement described below. In fact, for the fiscal year in question, ending June 30, 2014, Edu-Link and its supporting corporations were paid approximately \$257,660 less than authorized under contract, at my direction and with my knowledge and consent as manager. Also, I do not recall being a co-signer on the checking account, although I would like to review bank records which I do not have. As I recall, Marie Turchiaro and John Grant were signatories to the account through June 30, 2014. However, I think that the central question is not whether I was a co-signer, but whether I used my position to obtain funds not authorized under the services agreement. To that end, I offer the following explanations of the services provide by Edu-link and payments made under the agreement.

#### Agreement

Edu-Link LLC, Ink-Up, Inc. (Link-Up) and Educare Project and Development LLC (Educare) were jointly under an agreement with the Palm Beach Maritime Museum /dba the Palm Beach Maritime Academy (ACADEMY), to whom it jointly would provide school development and school management services.

Edu-Link LLC was a pass-through entity held in equal parts by Link-Up, owned by Daniel Rishavy, and Educare, owned by Patricia Aguiar. Together, Edu-Link LLC, Link-Up and Educare were all signatories to the agreement with the ACADEMY. As stated in the agreement Edu-Link's sole purpose was to support the agreement with the ACADEMY through its members. The contract required the ongoing involvement of Link-Up, Educare and their principals.

The agreement was for a seven years, beginning July 1, 2012. It had a provision for additional 3-year renewals. Daniel Rishavy was the manager of Edu-Link, LLC. Please refer to Exhibit 1 "Edu-Link services final 2.12.12 executed contract"

Services are summarized on page one of the agreement, with detail provided on pages two through five.

The key areas of support were:

- Financial support in budgeting, forecasting, purchasing, payroll, accounting, and reporting.
- Assistance in the development and implementation to the ACADEMY's academic programs and student-performance-measurement systems that are research based and focus on data-driven assessment.
- Human resources support, benefits administration, and insurance administration.
- Annual review and quarterly update of statutory and regulatory school compliance issues, and assessment of their inclusion in the school's program.
- Create sustainable program to include the expansion of the K-8 program and the development of a high school component for the ACADEMY. The academic rigor of academic program must meet the highest





Link-Up, Inc. 11093 Harbour Springs Circle, Boca Raton, FL 33428

standards; the maritime component is to complement the academic program and indelible, hands-on experience and inspiration through the integration of the maritime theme.

- Marketing and enrollment responsibility to ensure the viability of the school's program.
- The school must maintain a 3% positive fund balance on the accrual-based balance sheet, and project break-even on the revenue-expense budget before fees are due unless otherwise agreed by the governing board.

Service fees were scheduled at 9% of federal and state education funding if the school maintained a 3% unrestricted fund balance after the payment of services. The unrestricted fund balance is calculated on all annual revenues, and the services fee were based entirely upon federal and state education funding.

#### Provision of services

The services under the agreement were provided as required. In the execution of those services, in addition to the services provided by the Link-Up and Educare principals, Edu-Link employed two staff members who worked full time at the school, and others, engaged through Link-Up, who provided services to the school on and off-campus, and completed the high school charter application specified in the agreement. As this charter application was approved by the school district, the school was expanded to include a high school as of July 1, 2014.

#### Fee Calculation

Financial position of the ACADEMY for fiscal year ending June 30, 2013-14. Exhibit 2 "Audited financial position as of June 30, 2014". Pages 1 and 2.

The school ended the fiscal year June 30, 2014, with an unrestricted fund balance of \$515,312 against total revenues of \$8,588,410, which included \$7,678,151 of federal and state education funds.

Payment of service fees for fiscal-year 2013-14. Exhibit 2 "Service Fee Analysis" page 3.

The agreement fees of 9% of the federal and state education funds were \$691,034 for the fiscal year 2013-14. The 3% unrestricted fund balance requirement limited the earned service fees to \$615,712. I believe that jointly Edu-Link, Link-Up, and Educare were paid an approximate total of \$358,052 during that year, leaving a balance at year-end of \$257,660 not collected. To my best recollection, in a board meeting held in approximately July 2014, I told the ACADEMY board that the school ended the fiscal year with a \$515,312, and a 6% fund balance, which left an end-of-year unpaid balance to Edu-Link of \$257,660, but, under the current circumstances, as manager of Edu-Link, and Link-Up, I would not seek the additional payment due because the payment structure of the bonds as issued would present financial difficulties going forward. Patricia Aguiar had resigned and had withdrawn her corporation from Edu-Link in June of 2014, and had given this notice to John Grant, Superintendent of the ACADEMY.

Of course, I am available to answer further questions related to this matter.

Best regards,



Daniel Rishavy, CEO Link-Up, Inc..



Exhibit #9  
February 21, 2012, Service Agreement  
Between  
Link-Up, Inc.  
Educare Project and Development LLC.  
Edu-Link, LLC  
&  
Palm Beach Maritime Academy

**SERVICES AGREEMENT**

**BETWEEN**

**LINK-UP, INCORPORATED, EDUCARE PROJECT AND DEVELOPMENT LLC, EDU-LINK, LLC**  
**AND**

**PALM BEACH MARITIME MUSEUM, INC. d/b/a PALM BEACH MARITIME ACADEMY**

This Services Agreement (the "Agreement") is made effective as of this 21<sup>ST</sup> day of FEB., 2012 by and between the undersigned parties and pursuant to the following provisions.

EDUCARE PROJECT DEVELOPMENT LLC (hereinafter "EDUCARE") and LINK-UP, INCORPORATED (hereinafter "LINK-UP") are Florida companies that provide consultative and support services to charter schools. They are jointly proposing the services described in this Agreement, and will be operating under the joint venture known as EDU-LINK, LLC, a Florida limited liability company (hereinafter "EDU-LINK"). The PALM BEACH MARITIME MUSEUM, INC. d/b/a PALM BEACH MARITIME ACADEMY (hereinafter "ACADEMY") is a Florida non-profit corporation, who is authorized to operate one or more charter schools in Florida.

Whereas the ACADEMY desires services that will support the ACADEMY in sustaining and expanding its educational mission for the operation of its charter schools and related objectives, and whereas EDU-LINK wishes to provide the ACADEMY with such support services, the parties hereby agree as follows:

1. **SUMMARY OF SERVICES:** EDU-LINK will assist in the development and implementation of policies, procedures and programs to help the ACADEMY meet its charter contract obligations and objectives. EDU-LINK will provide guidance and support to the ACADEMY in the areas of finance, administration, academic operations, compliance with local, state and federal regulation, program growth and sustainability, and marketing and enrollment support. This will include:

- (1) Financial support in budgeting, forecasting, purchasing, payroll, accounting and reporting.
- (2) Assistance in the development and implementation of the ACADEMY's academic programs and student-performance-measurement systems that are research-based and focus on data-driven assessment.
- (3) Human resources support, benefits administration and insurance administration.
- (4) Annual review and quarterly update of statutory and regulatory school compliance issues, and assessment of their inclusion in the school's program.
- (5) Create sustainable program to include the expansion of the K-8 Program and the development of a high school component for the ACADEMY. The academic rigor of academic program must meet highest standards; the maritime component is to complement the academic program and provide indelible, hands-on experience and inspiration through the integration of the maritime theme.
- (6) Marketing and enrollment responsibility to ensure viability of the school's programs. The School must maintain a 3% positive fund balance on the accrual-based balance sheet, and project break-even on the revenue-expense budget before fees are due, unless otherwise agreed to by the governing board.

Initials:  

Services Agreement

Page 1 of 10

**2. DETAILED DESCRIPTION OF SERVICES:**

**2.1 Financial Management:** EDU-LINK will provide financial budgeting, forecasting, and reporting that is in conformance with all State and Federal requirements. Financial accounting and reporting will be in accordance with GAAP (Generally Accepted Accounting Principles) on a modified accrual basis, and in accordance with GASB standards (Governmental Accounting Standards Board). Reports will comply with the contractual financial reporting requirements of the charter, and will provide the ACADEMY with accurate, timely financial information and reconciliations. At the direction of the ACADEMY, EDU-LINK will meet with the Palm Beach School District to review financial reports in order to ensure that the ACADEMY's financial reporting meets the District's requirements. EDU-LINK will provide to the Palm Beach County School District and any other governmental agency any and all reports on a timely basis to conform to all applicable governmental and/or School District regulations. The Academy will fully cooperate in providing EDU-LINK with any and all information and resources reasonably necessary to fulfill this requirement. EDU-LINK will report monthly to the ACADEMY on these matters. The financial management services will include the following:

- (1) Fully GASB Compliant Fund Accounting, Cash Flow Management and Long-Range Financial Planning.
- (2) Budget preparation in consultation with school administration and the BOD
- (3) Actual-to-budget analysis and cash flow analysis, ongoing with monthly reporting
- (4) Purchase order system, integrated into the financial system
- (5) Invoice review, check preparation, Positive Pay check anti-fraud system management
- (6) Fixed asset system integrated into the financial system
- (7) Detailed Balance Sheet Account Reports: Assets, liabilities, and fund balances for each fund type
- (8) The original budget as approved by the governing board
- (9) Current budget as approved by the governing board
- (10) Revenues and expenditures, year-to-date, vs. budget
- (11) Transaction register
- (12) Bank activity and reconciliation report
- (13) Cash flow projection

**2.2 Payroll:** EDU-LINK will provide for and manage payroll related services, including the following:

- (1) Review payroll time sheets to budget
- (2) Prepare and produce payroll
- (3) Initiate tax deposits
- (4) Produce federal and state tax reports, 1099 and W2, W3, W4

**2.3 Human Resources:** EDU-LINK will provide human resource support to the ACADEMY that includes the preparation of compliant policies and procedures manuals and related forms. EDU-LINK will also provide professional human resource support and guidance on an ongoing basis. Services will include the following:

Initials: *JH* *DRK*

Services Agreement

- (1) EDU-LINK will prepare an Employee Handbook which will cover required Policies and procedures. These include, but are not limited to: ADA, FMLA, Workers' Compensation, problem resolution, disciplinary policies and procedures, employee appraisals, recruiting and hiring procedures, safety, separation procedures, disaster preparedness, compensation, benefits, abuse and molestation, wage and hour, internet and computer usage, investigations, discrimination and harassment, Drug Free Workplace .Program, Fingerprint/Background Check, Jessica Lunsford Act law, and time and attendance procedures.
- (2) EDU-LINK will prepare the program for New Employee Orientation
- (3) EDU-LINK will prepare required forms and documents and will implement procedures for Personnel Files Administration. These include:
  - (i) Employment Application
  - (ii) Position Description for each position
  - (iii) Affirmative Action Statement
  - (iv) I-9 Form
  - (v) W-4 Form Employee
  - (vi) Employee Information Sheet
  - (vii) Direct Deposit Form
  - (viii) Personnel Action Form
  - (ix) Employment Contract
  - (x) Various forms which pertain to personnel and the operation of the school.
- (4) EDU-LINK will provide assistance in managing regulatory employment-compliance issues. EDU-LINK will provide services for review of policies and procedures, forms, consultation regarding employment related issues, and bi-annual training regarding employment regulation.

**2.4 Benefits Administration:** EDU-LINK will assist in benefits administration, and will manage broker relations for the ACADEMY in order that the ACADEMY may make decisions about available:

- (1) Health Insurance
- (2) Group Term Life Insurance
- (3) Short and Long Term Disability
- (4) Dental Insurance
- (5) Retirement Program [403(b)]
- (6) Vision Coverage
- (7) Ancillary benefits
- (8) Annual leave
- (9) Sick Leave
- (10) Leaves of Absence
- (11) EAP
- (12) TRAINING Disciplinary Policies and Procedures
- (13) Team Building
- (14) Discrimination/Harassment (mandatory for compliance)
- (15) I-9 Procedures
- (16) Recruitment and Hiring Procedures
- (17) Supervisory leadership Training

Initials:

*JR* *DRR*

Services Agreement



- (18) Employee Appraisal Training
- (19) FMLA and ADA Training
- (20) Workers' Compensation Administration
- (21) Internal Communications

**2.5 Commercial Insurance:** EDU – LINK will direct the broker, chosen solely by the Academy, to undertake a competitive bid process and be creative with a plan design and contribution methods. It will provide recommendations for the placement of Workers' Compensation Insurance, General Liability Insurance, Auto Insurance (if applicable), Property Insurance (if applicable), Errors and Omissions Insurance, Fidelity Insurance and EPL Insurance, and other insurance required under the contract.

**2.6 Academic Program:** EDU-LINK will support the ACADEMY's development and implementation of a rigorous curriculum that integrates a STEAM (Science, Technology, Engineering, Art and Mathematics) program, consistent with Florida Next Generation Sunshine Standards, and threaded into a Maritime theme. The academic program services will include the following:

- (1) EDU-LINK will support the ACADEMY's selection and implementation of a data-driven, student-proficiency-assessment program, in order to indentify the proficiency levels of each student, providing information to the school staff to help it to determine appropriate individualized student instruction.
- (2) EDU-LINK will provide consultation and recommendations in regards to school policy, best practices, and academic regulatory compliance. It will assist the ACADEMY in the implementation of these recommendations through a Continuous School Improvement program:
- (3) EDU-LINK will lead in the preparation of amendments and applications for program expansion. It will provide the written curriculum, research support, budgets and other requirements of the sponsor.
- (4) EDU-LINK's academic-performance-support includes advice regarding:
  - (i) ESE-program-adherence (Exceptional Student Education) to the regulations governing IEPs, student evaluations, program standards, due process considerations, and required accommodations or modifications to meet student needs. Response to Interventions, as required to provide interventions in the areas of reading, math, and behavior to try to improve student achievement and/or behavior before a referral is made to ESE. Support includes the procedures that Response to Interventions requires for progress monitoring on a regular basis.
  - (ii) ELL (English Language Learner) program regulations.
  - (iii) 504 plans development and implementation in accordance with the law.
  - (iv) PMPs (Progress Monitoring Programs) for students who are significantly below proficiency and who will require individual learning plans that define the program of study to improve achievement.
  - (v) FCAT and End of Course Exam preparation.

Initials:

Services Agreement

- (vi) Benchmark tests to assess student progress toward mastery of the Sunshine State Standards.
- (vii) Thread Maritime studies throughout the curriculum.
- (viii) Development progress monitoring instruments to provide actionable measurement such as diagnostic assessment tools, alignment of curriculum with the Sunshine State Standards and the GLEs, and development of a standards-based performance measurement and reporting system.

**2.7 Marketing and Communications:** EDU-LINK will provide Marketing and Communications support for public engagement with the parents, the Palm Beach School District, and the community at large. EDU-LINK will develop a process to obtain feedback and input from the ACADEMY's stakeholders that can be utilized by the ACADEMY in managing its relationships. It will oversee marketing communications for the enrollment of the ACADEMY. By assuming the primary responsibility for the ACADEMY'S enrollment and also budgeting, EDU-LINK agrees that it will not have earned its fees unless the ACADEMY has broken even on its budget, while maintain at least a 3% unrestricted fund balance on its balance sheet.

**2.8 Professional Development:** EDU-LINK will provide guidance for professional development to (1) take advantage of the professional development opportunities offered by the district; (2) provide for internal programs that leverage internal competencies and promote institutional learning; and (3) recommend and support additional professional development to meet identified shortfalls not addressed through the preceding two procedures.

**2.9 Student Behavior:** EDU-LINK will provide guidance for Management of Student Behavior through the recommendation of (1) policies that defines behavioral expectations and the consequences for misbehavior, which will be defined in a Code of Conduct that is approved by the governing board; and (2) procedures for administering disciplinary action that ensures due process for all students.

### **3. PERFORMANCE REQUIREMENTS:**

**3.1 Reporting:** EDU-LINK will ensure that contractually-required financial reports, required employment-related tax and withholding filings and IRS annual reports are submitted timely. EDU-LINK will provide the ACADEMY with an annual financial reports schedule, and will report to the ACADEMY monthly on the adherence to that schedule. EDU-LINK will provide to the ACADEMY monthly an electronic copy of all files and reports developed in support of this Agreement. It will maintain a daily backup of all financial records, which will be maintained on the ACADEMY network, and also maintained in an off-site location to be determined by the ACADEMY.

Initials:

Services Agreement

Page 5 of 10

**3.2 Performance Measures:** The ACADEMY recognizes and agrees that academic performance involves many factors and further agrees that EDU-LINK shall not be held responsible for actual performance levels of the students and the school. However, as one of the ACADEMY's primary concerns, for which it is engaging EDU-LINK, is to drive up student performance from their current levels, EDU-LINK must reasonably demonstrate that the academic assessment programs, which it will help to select and implement, are providing measurable, timely, predictive and actionable student-proficiency information regarding the implementation of and adherence to a rigorous academic programs aligned with the academic program outlined this Agreement.

The ACADEMY may perform a monthly review in order to determine whether EDU-LINK is adhering to providing the services in accordance with this Agreement. If the ACADEMY believes EDU-LINK to be in breach of its performance of any services or duties under this Agreement, then the ACADEMY shall follow the procedures set forth in Section 3.3 of this Agreement.

**3.3 Default:** The ACADEMY will provide to EDU-LINK a written description detailing any breaches in the performance of this Agreement, and will provide EDU-LINK with a 90-day cure period. Material Breaches which may affect the ACADEMY'S immediate survival must be cured by EDU-LINK within the period agreed to in the Performance Exhibit to this agreement. EDU-LINK shall not be responsible for any non-performance arising due to force majeure events or any other events beyond the reasonable control of EDU-LINK or its agents, representatives, and personnel. If the breaches identified from the Performance Exhibit are not cured, as decided solely by the ACADEMY, within 90 days, then the ACADEMY shall have the power to terminate this Agreement.

**3.4 Disputes:** All parties agree that this Agreement shall be governed and construed according to the laws of the State of Florida and that the venue for resolving any legal or alternative dispute proceedings shall be in Palm Beach County, Florida.

**3.5 No Solicitation:** Both parties agree not to hire or engage for a period of two years from the effective date of this Agreement any persons that the other party has engaged to provide services under this Agreement without the written consent of the other party.

**3.6 Executive Responsibilities and Delegation:** Patricia Aguiar and Daniel Rishavy shall be the principal contacts for EDU-LINK (hereinafter the "Principals"). The ACADEMY, as a material inducement to enter into this Agreement, requires that each of the Principals agrees to remain personally involved and remain as principal, controlling owners of EDUCARE and LINK-UP during the term of this Agreement. If either of the Principals for EDU-LINK should not remain personally involved or remain as principal, controlling owners of EDUCARE and LINK-UP, then the ACADEMY may hold EDU-LINK in breach of this Agreement subject to the provisions of Section 3.3 of this Agreement. The parties agree that Patricia Aguiar, as a Principal of EDU-LINK, shall be responsible for the development of marketing plans and enrollment support, and that Daniel Rishavy, as a Principal for EDU-LINK, shall be responsible for providing the financial management and for overseeing budgeting and financial reporting. EDU-LINK may engage other persons or organizations in order to discharge its duties under this Agreement or delegate authorities to others to perform the services. It will have the sole authority to make these selections, and shall be responsible for their performance.

Initials:



Services Agreement

Page 6 of 10

- 3.7 Attendance at Board Meetings:** EDU-LINK will send an appropriate representative to Board meetings held by the ACADEMY. Quarterly board meetings will be attended by at least one of the Principals of EDU-LINK (Patricia Aguiar and/or Daniel Rishavy). The ACADEMY shall provide written notification to EDU-LINK and its Principals reasonably in advance of when Board meetings are held and also of any cancellations or changes to such meeting dates and times.
- 3.8 Proprietary Rights:** The ACADEMY retains all rights in its intellectual property, including without limitation, its creative rights over its trade names and charter school concepts and persona that constitute the subject matter of this Agreement. The ACADEMY for the term of this Agreement grants EDU-LINK a license to utilize all proprietary rights of the ACADEMY for the limited purpose of performing the services under this Agreement. Such license will terminate when this agreement terminates and the ACADEMY reserves all remedies under the law, including injunctive relief, to enforce the requirements of this section 3.8.
- 3.9 Confidentiality:** EDU-LINK agrees to hold in confidence school plans that are not in the public domain.
- 3.10 Exclusivity:**
- (a) For the term of this Agreement and for any renewal term thereof, EDU-LINK shall be the exclusive management company to provide the services under this Agreement and EDUCARE and LINK-UP shall be the sole owners EDU-LINK. EDU-LINK will work exclusively for Palm Beach Maritime Museum, Inc. unless otherwise agreed upon in writing by Palm Beach Maritime Museum, Inc. This does not restrict LINK-UP, INC. or EDUCARE from performing business and entering into charter school contracts, provided that it does not conflict with the proprietary rights as described in Section 3.8.
  - (b) For the term of this Agreement and for a period of two years following its termination (or following the expiration of any renewal term of the Agreement) the ACADEMY shall give EDU-LINK a first right of refusal to develop, build and manage any and all future charter school projects contemplated for and/or by the ACADEMY. The ACADEMY shall provide EDU-LINK with at least 60 days advance written notice describing the contemplated projects and offering EDU-LINK to act as the management company along terms similar to this Agreement.
  - (c) For the term of this Agreement and for a period of two years following its termination (or following the expiration of any renewal term of the Agreement), EDU-LINK shall not use the charter school model developed specifically for or by the ACADEMY in connection with other charter school projects not related to this Agreement without first obtaining in advance the written consent of the ACADEMY

4. **TERM OF AGREEMENT:** The term of this Agreement shall be from July 1, 2012 through June 30, 2019. This Agreement will apply to all charters obtained by the ACADEMY during the term of this Agreement. This Agreement may be renewed for additional 3-year terms upon the consent of all parties.

5. **FEES AND PAYMENT TERMS:**

5.1 **Fees:** EDU-LINK shall receive a services fee which shall consist of (1) 9% of State, Local and Federal funding, and (2) up to 9% of other funding sources that EDU-LINK is instrumental in securing and administering, provided that administrative fees are allowed under the terms provided by the funding sources. Fee-generating revenues exclude any revenues obtained from students, parents, and board members. The ACADEMY's financial accounting provided for under this Agreement will include all revenue sources, which will be segregated in the financial reports as fee allowable and non-allowable.

5.2 **Costs:** EDU-LINK shall not incur any expenses on behalf of the ACADEMY except as authorized in writing by the ACADEMY or pursuant to budget approved by the parties.

5.3 **Payment:** EDU-LINK will be paid its fees and reimbursed for any expenses approved by the ACADEMY on a bi-weekly basis on the 15th day and the last day of each month. Payments are initially based upon the revenue projection provided to the ACADEMY by the Palm Beach School District, but will be reconciled in the following month based upon the board-approved financial statement, which is to be provided to the ACADEMY within 20 days after the end of the month.

5.4 **Prior services:** Any services that are provided to the ACADEMY by EDU-LINK prior to the term of this Agreement are additional services to this Agreement and must be approved in advance by the ACADEMY and invoiced separately.

6. **GENERAL PROVISIONS:**

6.1 **Entire Agreement:** This Agreement contains the entire agreement and understandings of the parties and supersedes all prior and contemporaneous agreements, whether written or oral, concerning the subject matter herein.

6.2 **Amendments:** Any amendments or modifications to this Agreement shall not be effective unless made in writing signed by each of the parties to this Agreement.

6.3 **Binding Effect:** This Agreement is binding upon and shall inure to the benefit of the parties hereto and their respective heirs, executors, administrators, personal and legal representatives, successors and permitted assigns.

6.4 **Invalid Provisions:** Any provisions of this Agreement that are held to be invalid by a court or decision maker having competent jurisdiction nevertheless shall be construed to give the most reasonable and economic meaning and shall not in any way affect the validity of the remaining provisions.

Initials:



Services Agreement



**6.5 Context:** The headings and captions in this Agreement are for convenience only. Any reference to gender shall include the male, female, and neutral gender, and any references to the singular shall include the plural and vice versa, as the context requires. Any reference to "person" in this Agreement shall include individuals and entities.

**6.6 Notices:** Except as otherwise provided in this Agreement, all notices required or permitted under this Agreement shall be made in writing to a party's address. Notices shall be deemed given to a party as follows: (1) upon delivery to a party, if notice is given by personal delivery (to be evidenced by written receipt by the recipient or by sworn affidavit by the deliverer); (2) upon receipt or refusal of receipt, if notice is sent to a party's address by postage prepaid certified or registered mail with return receipt requested; (3) upon delivery (to be evidenced by delivery receipt), if notice is delivered to a party's address by nationally recognized courier service, or (4) upon facsimile or e-mail transmission (to be evidenced by written confirmation of successful transmittal). A party may change its address for giving of notices by following the procedure set forth in this paragraph. As of the effective date of this Agreement, notices to a party shall be given as follows:

If to the ACADEMY:

Name: Palm Beach Maritime Academy  
Attn: John C. Grant, President  
Address: P.O. Box 2317, Palm Beach, FL 33480  
Fax:  
E-mail: Museum@pbmm.org

With copy to:

Name: Jones, Foster, Johnston & Stubbs, P.A.  
Attn: Brian D. Kennedy, Esq.  
Address: 505 S. Flagler Drive, Suite 1100, West Palm Beach, FL 33401  
Fax: (561) 650-0485  
E-mail: bkennedy@jones-foster.com

If to EDU-LINK, LINK-UP, OR EDUCARE:

Name: Daniel Rishavy  
Attn:  
Address: 2142 NE 122 Road, N. Miami, FL 33181  
Fax: (954) 509-6553  
E-mail: dan.rishavy@gmail.com

With copy to:

Name: Patricia Aguiar  
Attn:  
Address: 845 N. Northlake Dr., Hollywood, FL 33019  
Fax:  
E-mail: peretzpatricia@aol.com

**6.7 Counterparts:** This Agreement may be executed in counterparts and signed copies provided by facsimile or e-mail transmission shall be given the same legal effect as the signed originals.

[Signatures on next page]

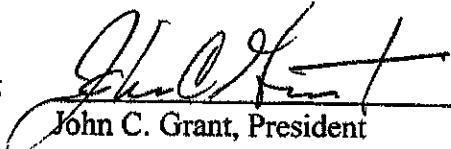
Initials:



Services Agreement

The foregoing Agreement is read and agreed as of the date first set forth above by:

PALM BEACH MARITIME MUSEUM, INC.  
d/b/a PALM BEACH MARITIME ACADEMY  
A Florida not for profit corporation

By:   
John C. Grant, President

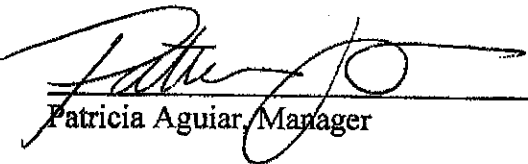
Date: 2/28/12

LINK-UP, INCORPORATED  
A Florida corporation

By:   
Daniel R. Rishavy, President

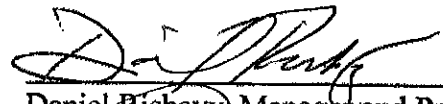
Date: 02/21/12

EDUCARE PROJECT AND DEVELOPMENT LLC  
A Florida limited liability company

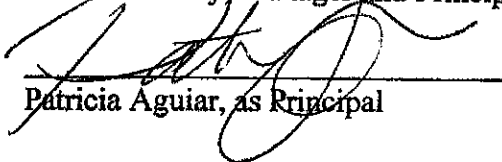
By:   
Patricia Aguiar, Manager

Date: 02/21/12



EDU-LINK, LLC  
A Florida limited liability company

By:   
Daniel Rishavy, Manager and Principal

Date: 02/21/12

By:   
Patricia Aguiar, as Principal

Date: 02/21/12

Initials:  

Services Agreement

**PALM BEACH MARITIME ACADEMY**  
**(A CHARTER SCHOOL UNDER PALM BEACH MARITIME MUSEUM, INC.)**  
**A CHARTER SCHOOL AND COMPONENT UNIT OF THE**  
**DISTRICT SCHOOL BOARD OF PALM BEACH COUNTY, FLORIDA**

**STATEMENT OF NET POSITION**

*June 30, 2014*

	<u>Governmental Activities</u>
<b>ASSETS</b>	
Cash & Cash Equivalents	\$ 597,552
Restricted Investments	22,614,598
Due From Other Agencies	241,963
Deferred Charges	710,913
Deposits and Prepaid Expenses	107,395
Other Assets	38,000
Capital Assets:	
Leasehold Improvements, Net	25,535
Furniture, Fixtures, and Equipment, Net	415,255
Assets Under Capital Lease, Net	435,600
Total Capital Assets, Net	<u>876,390</u>
<b>TOTAL ASSETS</b>	<u><u>25,186,811</u></u>
<b>LIABILITIES</b>	
Accounts Payable	32,810
Salary and Wages Payable	436,788
Long-Term Liabilities:	
Due within one year - Bonds Payable	1,600,000
Due within one year - Capital Leases	107,583
Due after one year - Bonds Payable	23,040,000
Due after one year - Capital Leases	306,553
<b>TOTAL LIABILITIES</b>	<u><u>25,523,734</u></u>
<b>NET POSITION</b>	
Net Investment in Capital Assets	(23,466,833)
Restricted for Debt Service	4,326,370
Restricted for Capital Projects	18,288,228
Unrestricted	515,312
<b>TOTAL NET POSITION</b>	<u><u>\$ (336,923)</u></u>

Audited Financial position, June 30, 2014

The accompanying notes to the financial statements are an integral part of this statement.

**PALM BEACH MARITIME ACADEMY**  
(A CHARTER SCHOOL UNDER PALM BEACH MARITIME MUSEUM, INC.)  
A CHARTER SCHOOL AND COMPONENT UNIT OF THE  
DISTRICT SCHOOL BOARD OF PALM BEACH COUNTY, FLORIDA

**STATEMENT OF REVENUES, EXPENDITURES, AND CHANGES  
IN FUND BALANCES - GOVERNMENTAL FUNDS**  
*For the Fiscal Year Ended June 30, 2014*

	General Fund	Debt Service Fund	Capital Projects Fund	Other Governmental Funds	Total Governmental Funds
<b>Revenues</b>					
Intergovernmental:					
Federal Through Local	\$ 94,122	\$ -	\$ -	\$ 336,115	\$ 430,237
State Sources	7,247,914				7,247,914
Local and Other	900,259				900,259
Total Revenues	<u>8,242,295</u>	<u>-</u>	<u>-</u>	<u>336,115</u>	<u>8,578,410</u>
<b>Expenditures</b>					
Current - Education:					
Instruction	\$ 3,785,635	\$ -	\$ -	336,115	\$ 4,121,750
Pupil Personnel Services	129,281				129,281
Instruction & Curriculum Development	609				609
Instructional Staff Training	2,924				2,924
Board of Education	242,084				242,084
General Administration	205,869				205,869
School Administration	718,679				718,679
Facilities Acquisition & Construction	1,158,119				1,158,119
Fiscal Services	310,930				310,930
Food Services	43,051				43,051
Central Services	73,305				73,305
Pupil Transportation	337,081				337,081
Operation of Plant	698,055				698,055
Maintenance of Plant	77,881				77,881
Admin. Technology	26,461				26,461
Community Service	206,212				206,212
Fixed Capital Outlay:					
Facilities Acquisition & Construction	12,378				12,378
Other Capital Outlay	581,833				581,833
Debt Service:					
Principal	1,392,265				1,392,265
Interest and Fiscal Charges	1,219,151				1,219,151
Total Expenditures	<u>11,221,803</u>	<u>-</u>	<u>-</u>	<u>336,115</u>	<u>11,557,918</u>
Excess (Deficiency) of Revenues Over Expenditures	<u>(2,979,508)</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>(2,979,508)</u>
Other Financing Sources (Uses):					
Proceeds From Bond Issue	25,640,000				25,640,000
Proceeds From Inception of Capital Leases	243,930				243,930
Debt Forgiveness	10,000				10,000
Transfers In/(Out)	(22,614,598)	4,326,370	18,288,228		-
Total Other Financing Sources (Uses)	<u>3,279,332</u>	<u>4,326,370</u>	<u>18,288,228</u>	<u>-</u>	<u>25,893,930</u>
Net Change in Fund Balances	299,824	4,326,370	18,288,228	-	22,914,422
Fund Balances, July 1, 2013	215,488	-	-	-	215,488
Fund Balances, June 30, 2014	<u>\$ 515,312</u>	<u>\$ 4,326,370</u>	<u>\$ 18,288,228</u>	<u>\$ -</u>	<u>\$ 23,129,910</u>

Audited financial position, June 30, 2014

The accompanying notes to financial statements are an integral part of this statement.

## EXHIBIT 2

### Service Fee Analysis

Palm Beach Maritime Academy (2801)  
 Fiscal Year End, June 30, 2014

	Location	Exhibit page	Item	%	
Federal through Local Revenue	Exhibit 2	Page 2	2		\$ 430,237
State Sources of Revenue	Exhibit 2	Page 2	3		\$ 7,247,914
Total Federal and State Sources of Revenue					<u>\$ 7,678,151</u>
Other Revenue	Exhibit 2	Page 2	4		\$ 910,259
Total Reveune	Exhibit 2	Page 2	5		<u>\$ 8,588,410</u>
3% of Total Revenues, Required Unrestricted fund balance.				3.0%	\$ 257,652
Actual Unrestricted Fund Balance, and calculation as a % of Total Revenue.	Exhibit 2	Page 1	1	6.0%	\$ 515,312
Fees applicable before unrestricted fund balance cap (9 % of Total Federal and State Funds).				9.0%	\$ 691,034
Fees Paid.					\$ 358,052
Total Fees Due Under Agreement, after fund balance cap.					<u>\$ 615,712</u>
Additional Unrestricted Funds Due for Fees, Not Collected.					\$ 257,660



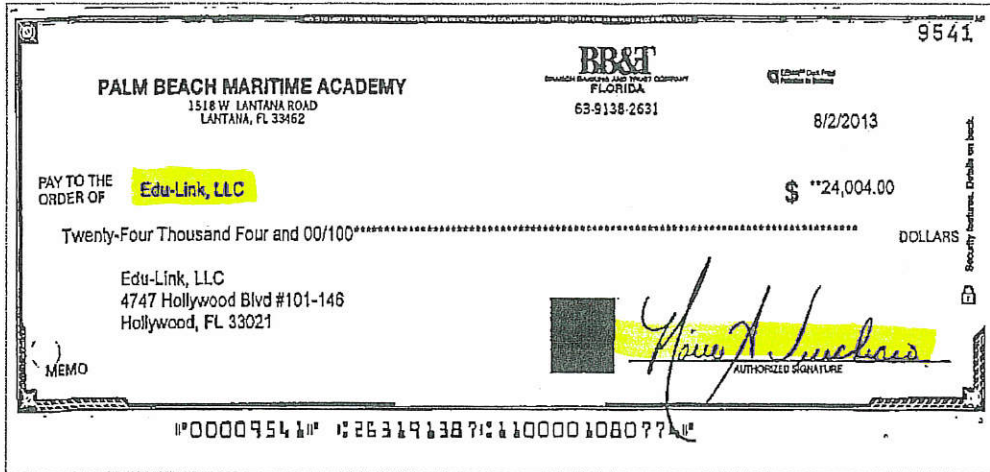
Exhibit #10  
PBMA Invoices Payable  
to  
Edu-Link, Inc.  
from  
July 2013 through June 2014

# BB&T OnLine® CHECK IMAGE

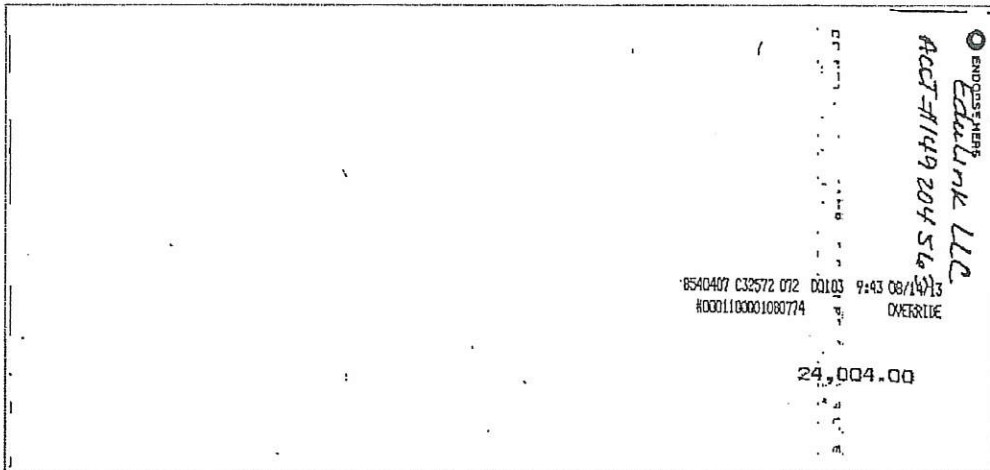
Print | Save Instructions | Close Window

Account Type: Checking Account: 1100001080774 Date: 08/14/2013 Check Number: 9541 Amount: \$24004.00

Front View Click Image to Enlarge



Back View Click Image to Enlarge



Print | Close Window

### Save Instructions

**Windows users:** Right click on the image of the check and select Save Picture As.

**Mac users:** Drag the image of the check onto your desktop.

Please note that you'll have to save the front and back check images individually.

For assistance, call BB&T OnLine Support at 1-888-BBT-ONLINE (1-888-228-6654).

**PALM BEACH MARITIME ACADEMY**

1518 W. LANTANA ROAD  
LANTANA, FL 33462

63-9138-2631

9/3/2013

PAY TO THE ORDER OF Edu-Link, LLC

Twelve Thousand Two and 00/100\*\*\*\*\*

\$ \*\*12,002.00

DOLLARS

Edu-Link, LLC  
4747 Hollywood Blvd #101-146  
Hollywood, FL 33021

MEMO

⑆00009631⑆ ⑆263191387⑆ 1000010807⑆



AUTHORIZED SIGNATURE

*Yancy M. Sheehan*



Security features. Details on back.

9631

**PALM BEACH MARITIME ACADEMY**

1518 W. LANTANA ROAD  
LANTANA, FL 33462

63-9138-2631

8/18/2013

PAY TO THE ORDER OF Edu-Link, LLC

One Thousand Five Hundred Fifty-Six and 92/100\*\*\*\*\*

\$ \*\*1,556.92

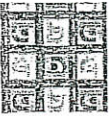
DOLLARS

Edu-Link, LLC  
4747 Hollywood Blvd #101-146  
Hollywood, FL 33021

MEMO

reimburse for two Refrigerators + 3-year warranty

⑆00009569⑆ ⑆263191387⑆ 1000010807⑆



AUTHORIZED SIGNATURE

*Yancy M. Sheehan*



Security features. Details on back.

9569

**PALM BEACH MARITIME ACADEMY**

1518 W LANTANA ROAD  
LANTANA, FL 33462

**BB&T**  
BRANCH BANKING AND TRUST COMPANY  
FLORIDA

63-9138-2631

ESNet<sup>SM</sup> Check Fraud  
Protection for Business

11/21/2013

PAY TO THE ORDER OF Edu-Link, LLC

\$ \*\*12,002.00

Twelve Thousand Two and 00/100\*\*\*\*\*

DOLLARS

Edu-Link, LLC  
4747 Hollywood Blvd #101-146  
Hollywood, FL 33021



*[Signature]*  
AUTHORIZED SIGNATURE

Security features. Details on back.

MEMO

⑈00010036⑈ ⑆263191387⑆ 10000108077⑆⑈

**PALM BEACH MARITIME ACADEMY**

✓ 10036

Edu-Link, LLC					11/21/2013	
Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment
11/21/2013	Bill	1022	12,002.00	12,002.00		12,002.00
					Check Amount	12,002.00

BB&T-0774

12,002.00

**PALM BEACH MARITIME ACADEMY**

✓ 10036

Edu-Link, LLC					11/21/2013	
Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment
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					Check Amount	12,002.00

BB&T-0774

12,002.00

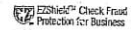


**PALM BEACH MARITIME ACADEMY**

1518 W LANTANA ROAD  
LANTANA, FL 33462

**BB&T**  
BRANCH BANKING AND TRUST COMPANY  
FLORIDA

63-9138-2631



11/8/2013

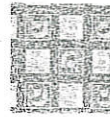
PAY TO THE ORDER OF Edu-Link, LLC

\$ \*\*12,002.00

Twelve Thousand Two and 00/100\*\*\*\*\*

DOLLARS

Edu-Link, LLC  
4747 Hollywood Blvd #101-146  
Hollywood, FL 33021



*[Handwritten Signature]*  
AUTHORIZED SIGNATURE

MEMO

⑈0000996⑆ ⑆263⑆9⑆38⑆7⑆⑆10000⑆1080⑆7⑆7⑆⑈

Security features. Details on back.

**PALM BEACH MARITIME ACADEMY**

Edu-Link, LLC

11/8/2013

9961

Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment
11/8/2013	Bill	1021	12,002.00	12,002.00		12,002.00
					Check Amount	12,002.00

BB&T-0774

12,002.00

**PALM BEACH MARITIME ACADEMY**

Edu-Link, LLC

11/8/2013

9961

Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment
11/8/2013	Bill	1021	12,002.00	12,002.00		12,002.00
					Check Amount	12,002.00

BB&T-0774

12,002.00





**PALM BEACH MARITIME ACADEMY**

1518 W LANTANA ROAD  
LANTANA, FL 33462

**BB&T**  
BRANCH BANKING AND TRUST COMPANY  
FLORIDA

63-9138-2631

EZShield<sup>SM</sup> Check Fraud  
Protection for Business

12/18/2013

PAY TO THE ORDER OF Edu-Link, LLC

\$ \*\*12,002.00

Twelve Thousand Two and 00/100\*\*\*\*\*

DOLLARS

Edu-Link, LLC  
4747 Hollywood Blvd #101-146  
Hollywood, FL 33021



*[Handwritten Signature]*  
AUTHORIZED SIGNATURE

MEMO

⑈00010118⑈ ⑆263191387⑆ 110000108077⑈

Security features. Details on back.

**PALM BEACH MARITIME ACADEMY**

10118

Date	Type	Reference	Original Amt.	Balance Due	12/18/2013 Discount	Payment
12/18/2013	Bill	1024	12,002.00	12,002.00		12,002.00
					Check Amount	12,002.00

**PALM BEACH MARITIME ACADEMY**

10118

Date	Type	Reference	Original Amt.	Balance Due	12/18/2013 Discount	Payment
12/18/2013	Bill	1024	12,002.00	12,002.00		12,002.00
					Check Amount	12,002.00

BB&T-0774

12,002.00

10249

**PALM BEACH MARITIME ACADEMY**

1518 W LANTANA ROAD  
LANTANA, FL 33462

**BB&T**  
BRANCH BANKING AND TRUST COMPANY  
FLORIDA

63-9138-2631

EZ<sup>®</sup> Check Fraud  
Protection for Business

2/3/2014

PAY TO THE  
ORDER OF Edu-Link, LLC

\$ \*\*12,002.00

Twelve Thousand Two and 00/100\*\*\*\*\*

DOLLARS

Edu-Link, LLC  
4747 Hollywood Blvd #101-146  
Hollywood, FL 33021



*[Handwritten Signature]*  
AUTHORIZED SIGNATURE

Security features. Details on back.

MEMO

⑈00010249⑈ ⑆263191387⑆ 110000108077⑈

**PALM BEACH MARITIME ACADEMY**

10249

Edu-Link, LLC				2/3/2014	
Date	Type	Reference	Original Amt.	Balance Due	Discount
2/3/2014	Bill	1026	12,002.00	12,002.00	
				Check Amount	12,002.00

BB&T-0774 12,002.00

**PALM BEACH MARITIME ACADEMY**

10249

Edu-Link, LLC				2/3/2014	
Date	Type	Reference	Original Amt.	Balance Due	Discount
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				Check Amount	12,002.00

BB&T-0774 12,002.00

10462

**PALM BEACH MARITIME ACADEMY**

1518 W LANTANA ROAD  
LANTANA, FL 33462

**BB&T**  
BRANCH BANKING AND TRUST COMPANY  
FLORIDA

63-9138-2631

Check Fraud  
Protection for Business

3/27/2014

PAY TO THE  
ORDER OF Edu-Link, LLC

\$ \*\*12,002.00

Twelve Thousand Two and 00/100\*\*\*\*\*

DOLLARS

Edu-Link, LLC  
4747 Hollywood Blvd #101-146  
Hollywood, FL 33021



*[Handwritten Signature]*  
AUTHORIZED SIGNATURE

Security features. Details on back.

MEMO

⑈00010462⑈ ⑆263191387⑆ 1100001080774⑈

**PALM BEACH MARITIME ACADEMY**

10462

Edu-Link, LLC

Date Type Reference  
3/27/2014 Bill 1032

Original Amt.  
12,002.00

Balance Due  
12,002.00

3/27/2014

Discount

Payment  
12,002.00

Check Amount

12,002.00

BB&T-0774

12,002.00

**PALM BEACH MARITIME ACADEMY**

10462

Edu-Link, LLC

Date Type Reference  
3/27/2014 Bill 1032

Original Amt.  
12,002.00

Balance Due  
12,002.00

3/27/2014

Discount

Payment  
12,002.00

Check Amount

12,002.00

BB&T-0774

12,002.00

**PALM BEACH MARITIME ACADEMY**

1518 W LANTANA ROAD  
LANTANA, FL 33462

**BB&T**  
BRANCH BANKING AND TRUST COMPANY  
FLORIDA

63-9138-2631

Check Fraud  
Prevention for Business

4/17/2014

PAY TO THE  
ORDER OF Edu-Link, LLC

\$ \*\*12,002.00

Twelve Thousand Two and 00/100\*\*\*\*\* DOLLARS

Edu-Link, LLC  
4747 Hollywood Blvd #101-146  
Hollywood, FL 33021



*[Handwritten Signature]*  
AUTHORIZED SIGNATURE

MEMO

⑈00010508⑈ ⑆263191387⑆ 1100001080774⑈

PALM BEACH MARITIME ACADEMY

10508

Edu-Link, LLC				4/17/2014		
Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment
4/17/2014	Bill	1034	12,002.00	12,002.00		12,002.00
				Check Amount		12,002.00

BB&T-0774

12,002.00

PALM BEACH MARITIME ACADEMY

10508

Edu-Link, LLC				4/17/2014		
Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment
4/17/2014	Bill	1034	12,002.00	12,002.00		12,002.00
				Check Amount		12,002.00

BB&T-0774

12,002.00

**PALM BEACH MARITIME ACADEMY**

1518 W LANTANA ROAD  
LANTANA, FL 33462

**BB&T**  
BRANCH BANKING AND TRUST COMPANY  
FLORIDA  
63-9138-2631

Check Fraud  
Protection for Business

5/2/2014

PAY TO THE  
ORDER OF Edu-Link, LLC

\$ \*\*12,002.00

Twelve Thousand Two and 00/100\*\*\*\*\*

DOLLARS

Edu-Link, LLC  
4747 Hollywood Blvd #101-146  
Hollywood, FL 33021



*[Signature]*  
AUTHORIZED SIGNATURE

MEMO

⑈00010546⑈ ⑆263191387⑆ 110000106077⑈

Security features. Details on back.

**PALM BEACH MARITIME ACADEMY**

10546

Edu-Link, LLC

Date Type Reference  
5/2/2014 Bill 1035

Original Amt.  
12,002.00

Balance Due  
12,002.00

5/2/2014

Discount

Payment  
12,002.00

Check Amount

12,002.00

BB&T-0774

12,002.00

**PALM BEACH MARITIME ACADEMY**

10546

Edu-Link, LLC

Date Type Reference  
5/2/2014 Bill 1035

Original Amt.  
12,002.00

Balance Due  
12,002.00

5/2/2014

Discount

Payment  
12,002.00

Check Amount

12,002.00

BB&T-0774

12,002.00



# BB&T OnLine® DEPOSIT IMAGES

Print | Save Instructions | Close Window

Account Type: Checking Account: 1100001080774 Date: 05/08/2014 Amount: \$12002.00

Front View

Click Image to Enlarge

<b>BB&amp;T</b> Branch Banking and Trust Company		<b>Account Deposit / Depositar a Cuenta de</b>		Dollars/Dólares	Cents/Centavos
Deposit To The Account O/Depositar a la cuenta de:		<input checked="" type="checkbox"/> Checking/Cheques <input type="checkbox"/> Savings/Ahorros			
Address/Dirección		Date/Fecha		Total	
City, State, Zip Code/Ciudad, Estado, Código Postal		Please Sign Here If Cash Received Por favor firme aquí si recibió efectivo		Less: Cash Received Menos: Efectivo Recibido	
Total Deposit Depósito Total \$				12,002.00	
Please enter your account number below: Por favor escriba su número de cuenta abajo:		8540407 C32572 072 00203 16:27 05/08/14		#0001100001080774 OVERRIDE	
1100001080774				12,002.00	
F0008000260 (Rev. 01/2012)					
0591011210				33	

Back View

Click Image to Enlarge

#10668 correction made w/ CK #10668

12,002.00		PAID	
8540407 C32572 072 00203 16:27 05/08/14		6-04-2014	
#XXXXXXXXXXXX0774 DUPLICATE DEPOSIT		CK#10668	
		8540407 C32572 072 00203 16:27 05/08/14	
		#0001100001080774 DUPLICATE DEPOSIT	
		12,002.00	

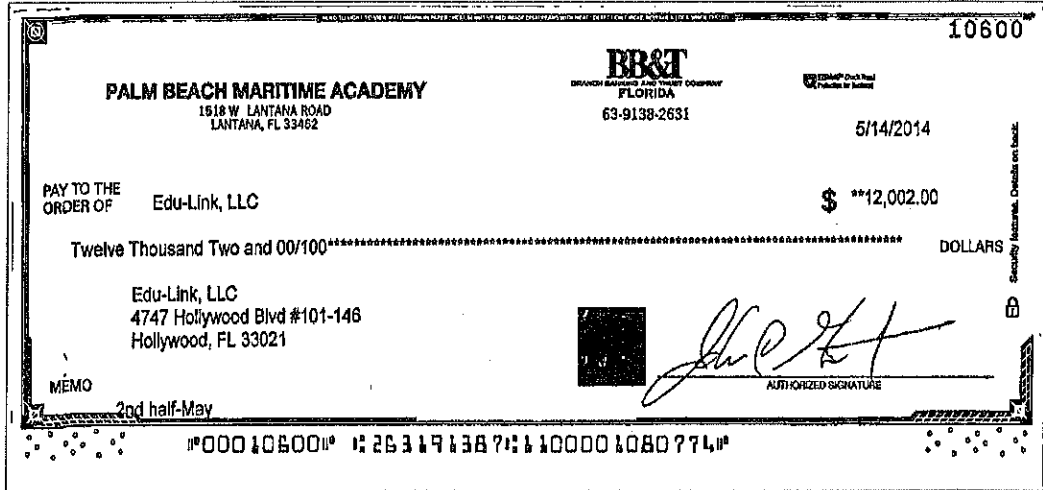
Print | Close Window

# BB&T OnLine<sup>®</sup> CHECK IMAGE

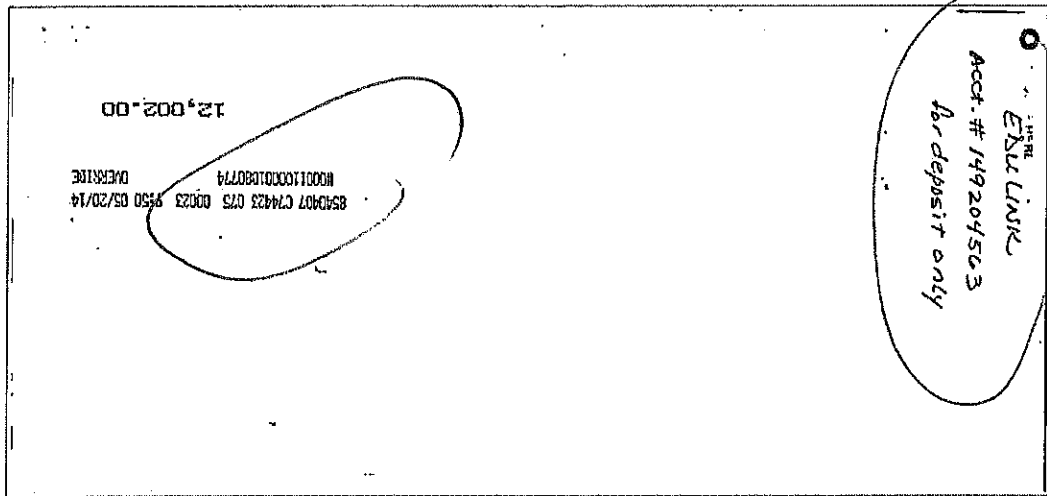
Print | Save Instructions | Close Window

Account Type: Checking Account: 1100001080774 Date: 05/20/2014 Check Number: 10600 Amount: \$12002.00

Front View Click Image to Enlarge



Back View Click Image to Enlarge



Print | Close Window

### Save Instructions

**Windows users:** Right click on the image of the check and select Save Picture As.

**Mac users:** Drag the image of the check onto your desktop.

Please note that you'll have to save the front and back check images individually.

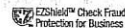
For assistance, call BB&T OnLine Support at 1-888-BBT-ONLINE (1-888-228-6654).

**PALM BEACH MARITIME ACADEMY**

1518 W LANTANA ROAD  
LANTANA, FL 33462



63-9138-2631



6/24/2014

PAY TO THE ORDER OF Edu-Link, LLC

\$ \*\*20,000.00

Twenty Thousand and 00/100\*\*\*\*\* DOLLARS

Edu-Link, LLC  
4747 Hollywood Blvd #101-146  
Hollywood, FL 33021



*[Handwritten Signature]*  
AUTHORIZED SIGNATURE

MEMO

⑈00010734⑈ ⑆263191387⑆ 100001080774⑈

**PALM BEACH MARITIME ACADEMY**

Edu-Link, LLC

Date Type Reference  
6/24/2014 Bill 1040

Original Amt.  
20,000.00

Balance Due  
20,000.00

6/24/2014  
Discount

Payment  
20,000.00

Check Amount

20,000.00

BB&T-0774

20,000.00

**PALM BEACH MARITIME ACADEMY**

Edu-Link, LLC

Date Type Reference  
6/24/2014 Bill 1040

Original Amt.  
20,000.00

Balance Due  
20,000.00

6/24/2014  
Discount

Payment  
20,000.00

Check Amount

20,000.00

BB&T-0774

20,000.00

10723

**PALM BEACH MARITIME ACADEMY**

1518 W LANTANA ROAD  
LANTANA, FL 33462

**BB&T**  
BRANCH BANKING AND TRUST COMPANY  
FLORIDA  
63-9138-2631

EZSIGN™ Check Fraud  
Protection for Business

6/17/2014

PAY TO THE  
ORDER OF Edu-Link, LLC

\$ \*\*12,002.00

Twelve Thousand Two and 00/100\*\*\*\*\*

DOLLARS

Edu-Link, LLC  
4747 Hollywood Blvd #101-146  
Hollywood, FL 33021



*[Handwritten Signature]*  
AUTHORIZED SIGNATURE

MEMO

Batch FY14 80

⑈00010723⑈ ⑆263191387⑆ 110000108077⑈

Security features. Details on back.

**PALM BEACH MARITIME ACADEMY**

10723

Edu-Link, LLC

Date Type Reference  
6/17/2014 Bill 1038

Original Amt.  
12,002.00

Balance Due  
12,002.00

6/17/2014

Discount

Payment  
12,002.00

Check Amount

12,002.00

BB&T-0774

Batch FY14\_80

12,002.00

**PALM BEACH MARITIME ACADEMY**

10723

Edu-Link, LLC

Date Type Reference  
6/17/2014 Bill 1038

Original Amt.  
12,002.00

Balance Due  
12,002.00

6/17/2014

Discount

Payment  
12,002.00

Check Amount

12,002.00

BB&T-0774

Batch FY14\_80

12,002.00

Exhibit #11

November 13, 2020, 20-day Email Response

From

Daniel Rishavy



Thank you for your response.

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--

Robert L. Sheppard, Jr.  
Auditor/Investigator SRI  
Office of Inspector General  
3138 Forest Hill Blvd., Suite C-306  
West Palm Bch, FL 33406  
Phone: (561) 648-6877  
PX# 46877  
Email: [Robert.Sheppard@palmbeachschools.org](mailto:Robert.Sheppard@palmbeachschools.org)

---

**Robert Sheppard** <[robert.sheppard@palmbeachschools.org](mailto:robert.sheppard@palmbeachschools.org)>

Fri, Nov 13, 2020 at 2:30 PM

To: Dan Rishavy <[dan.rishavy@gmail.com](mailto:dan.rishavy@gmail.com)>


Attached is a copy of the investigative report at Palm Beach Maritime Academy (PBMA). Please review the report in its entirety and note that you have 20-work days to respond. The 20-work day ends December 14, 2020....If you have any questions please do not hesitate to contact me at (561) 649-6877 or email at [Robert.Sheppard@palmbeachschools.org](mailto:Robert.Sheppard@palmbeachschools.org).

Thank you..

Robert L. Sheppard, Jr.  
Auditor/Investigator SRI  
Office of Inspector General  
3138 Forest Hill Blvd., Suite C-306  
West Palm Bch, FL 33406  
Phone: (561) 649-6877  
PX# 46877  
Email: [Robert.Sheppard@palmbeachschools.org](mailto:Robert.Sheppard@palmbeachschools.org)

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 **Daniel Rishavy 111320.pdf**  
2495K

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**Dan Rishavy** <[dan.rishavy@gmail.com](mailto:dan.rishavy@gmail.com)>

Fri, Nov 13, 2020 at 4:18 PM

To: Robert Sheppard <[robert.sheppard@palmbeachschools.org](mailto:robert.sheppard@palmbeachschools.org)>

Mr. Sheppard,

I have read fully the OIG report for case number 20-0008-1 and have no further comments.

Best regards,

Daniel Rishavy

[Quoted text hidden]

Exhibit #12

November 18, 2020, 20-day Email Response


From

Richard Scott Shelley

Robert L. Sheppard, Jr.  
Auditor/Investigator SRI  
Office of Inspector General  
3138 Forest Hill Blvd., Suite C-306  
West Palm Bch, FL 33406  
Phone: (561) 649-6877  
PX# 46877  
Email: [Robert.Sheppard@palmbeachschools.org](mailto:Robert.Sheppard@palmbeachschools.org)

[Quoted text hidden]

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 **Richard Scott Shelley 111320.pdf**  
2494K

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**Scott Shelley** <[emailscottshelley@gmail.com](mailto:emailscottshelley@gmail.com)>

Wed, Nov 18, 2020 at 8:20 AM

To: Robert Sheppard <[robert.sheppard@palmbeachschools.org](mailto:robert.sheppard@palmbeachschools.org)>

Mr Sheppard,

I am reaching out to clarify some inaccuracies in relation to the description of Apollo Advisory within your report. I would appreciate it if you would make the following corrections prior to finalizing the report.

Apollo Advisory Inc is a financial advisory company, it provides "advice" only. It is not a marketing company as described in your report nor has it ever marketed anything. The purpose of the entity is to provide (non-securities/non-investment) financial advice as it relates to managing financial risks, advising on insurance, partnership structures, customer and vendor contracts, identifying ways to increase the profitability and reduce the tax liability of a business. This may include advice on marketing strategies but Apollo does not provide marketing services.

The mandated FINRA disclosure of this outside business activity may have been misinterpreted as activities of Apollo but in reality it was meant to be a description of what Blueline360 does not what Apollo does. The disclosures intent is to clarify that the nature of the outside business activity does not involve securities (private or public) and does not involve raising monies from investors.

Additionally, I would like to also have the record reflect that the Advisory Board for Blueline360 was a voluntary, non-compensated group of primarily retired law enforcement agents and myself established to brainstorm business growth ideas and strategies that the Principles of Blueline360, could if they chose to, implement into their business. The focus was to provide ideas on how best to educate and bring awareness of Blueline360's services to schools, municipalities, law enforcement agencies and communities.

Other than those issues, I am pleased with the accurate conclusion of your report. I took my time on the Board of PBMA very seriously and it was extremely important to me personally that it had a positive impact on the school. During my time on the Board I believe I was instrumental in keeping the school from going out of business due to a very poorly structured debt deal put in place by former leadership and I participated in seeing technology and a partnership with Lantana PD incorporated into the campuses that has made PBMA one of the safest schools in the country for both our students to learn in, as well as our teachers and staff to work at. I make no apologies for my passion on these issues and I am very proud of the accomplishments the Board I sat on made.

Scott Shelley

Please confirm the email has been received.

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**Robert Sheppard** <[robert.sheppard@palmbeachschools.org](mailto:robert.sheppard@palmbeachschools.org)>  
To: Scott Shelley <[emailscottshelley@gmail.com](mailto:emailscottshelley@gmail.com)>

Wed, Nov 18, 2020 at 9:37 AM

Good morning,

I received your response, when you have a moment please contact me at (561) 633-8922...

Robert L. Sheppard, Jr.