

## ***DERM's Gravy Train***

*A Step-by-Step Breakdown of How Miami-Dade County Weaponizes Environmental Policy for Profit and Land Control*

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### **Introduction**

This report exposes the abusive tactics, regulatory manipulation, and interagency collusion employed by the Miami-Dade County Division of Environmental Resources Management (DERM) to systematically seize land, silence dissent, and expand its funding pipeline—all under the false pretense of environmental protection.

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### **Step 1: Declare a Wetland Without Scientific Basis**

DERM routinely designates land as “wetland” based on outdated aerial imagery, misidentified or unverified plant species, and speculative field notes—often without ever conducting a site visit. Required elements such as real-time soil testing, hydrologic monitoring, and elevation surveys are routinely skipped. Although DERM cites Rule 62-340, Florida Administrative Code, the actual criteria—especially those relating to hydrology and soil indicators—are rarely applied as written. Established agricultural use is ignored, even when documented by tax records, USDA filings, and years of lawful operation.

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### **Step 2: Biologist and Code Enforcer—Same Person, Two Roles, One Agenda**

DERM allows the same employee to function simultaneously as both field biologist and code enforcement officer—an inherent and deeply flawed conflict of interest. In practice, the individual who authors the biological assessment is also the one who issues the citation. Under different job titles, the same person becomes the **scientist, investigator, accuser, and enforcer**—with no independent review or procedural safeguards.

This dual-role arrangement violates **basic principles of administrative fairness, Florida's Code of Ethics for Public Officers and Employees (§112.311–112.326, F.S.), and best practices for regulatory integrity**. It undermines public trust and opens the door to abuse of authority.

One official may issue a Cease and Desist Order based on subjective or unverified field notes, then follow up with a formal citation enforcing their own findings. Supervisors routinely sign off without conducting independent evaluations, effectively rubber-stamping the misconduct rather than correcting it.

This setup has resulted in **multiple serious violations**, including:

- **Fabricated reports presented as official evidence**
- **Biological assessments issued without site access**

- **Cease and Desist Orders based on false or speculative data**
- **Lack of proper recusal or conflict disclosures as required by ethics law**

These are not isolated incidents—they form a **recurring pattern of abuse** driven by a system that prioritizes enforcement quotas and funding justification over truth, fairness, and legal compliance. This conduct may also violate provisions of the **Florida Administrative Procedure Act** and **the due process rights protected under the U.S. and Florida Constitutions**.

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### **Step 3: Generate a False Inspection Report**

DERM inspection reports are routinely compiled without scientific integrity or legal compliance. Instead of conducting site-specific evaluations as required under **Rule 62-340, Florida Administrative Code**, DERM relies on **fabricated imagery, speculative observations, and references to nearby properties** that bear no relevance to the actual parcel in question. Vegetation lists are cherry-picked, soil profiles are skipped, and no hydrologic testing is performed—**despite being explicitly required by law**.

This conduct violates multiple provisions of Florida law and professional standards, including:

- **Rule 62-340.300, F.A.C.** – which mandates site-specific analysis of hydrology, vegetation, and soils in determining wetland jurisdiction.
- **§120.57, Florida Statutes** (Administrative Procedure Act) – which guarantees due process and requires substantial, competent evidence for enforcement actions.
- **§112.313(6), Florida Statutes** – prohibiting public officers from using their official position to secure benefits through deceit or misrepresentation.
- **Florida Board of Professional Engineers and Environmental Professional Standards** – which require accuracy, objectivity, and avoidance of misrepresentation in official reporting.

By submitting false or unsupported reports as the foundation for enforcement, DERM may be engaged in **regulatory fraud, abuse of authority, and denial of due process rights**. These reports are not neutral scientific assessments—they are **predetermined narratives designed to trigger enforcement, support funding applications, and drive land acquisition schemes**.

The deliberate omission of hydrologic testing, soil boring, and on-site vegetation surveys—combined with the misuse of unrelated aerial imagery and adjacent parcels—undermines every principle of lawful regulation and environmental science. The result is a system in which false reports are weaponized against property owners, with no accountability for accuracy or legality.

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### **Step 4: Declare a Wetland by Visual Guesswork – No Testing, No Science**

On August 1, 2024, DERM issued and posted a Cease and Desist Order on the agricultural property located near **SW 205th Avenue in the Las Palmas Community**, without entering the land, collecting any field data, or notifying the trustee. The notice was based solely on **speculative observation**—likely

from the roadside—and was **recorded against the property title**, launching formal enforcement with no scientific justification.

There was no rain, no visible inundation, and no field activity occurring that day. Yet DERM initiated enforcement **without a wetland delineation**, and **without conducting the minimum requirements of Rule 62-340, Florida Administrative Code**, which mandates an on-site three-part test: **vegetation, soils, and hydrology** under **normal, unaltered conditions**.

No elevation map was prepared. No soil borings were taken. No hydrologic data or seasonal water table analysis was presented. DERM simply declared the presence of a wetland through **visual guesswork**, bypassing the scientific standards that protect landowners from arbitrary enforcement.

This conduct violates:

- **Rule 62-340.300, F.A.C.** – requiring objective and site-specific delineation methodology;
- **§163.3162 and §823.14, Florida Statutes** – shielding bona fide agricultural land from unsubstantiated environmental regulation;
- And **basic administrative due process**.

This was not science. It was a regulatory ambush designed to create a paper trail of presumed violations, pressuring landowners into compliance or surrender **without evidence, without process, and without jurisdiction**.

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## **Step 5: Misleading Plant List Created After Enforcement – No Scientific Basis, No Site Integrity**

After issuing a **Cease and Desist Order on August 1, 2024**, without performing any on-site hydrologic testing, soil borings, or formal delineation procedures, **DERM returned weeks later only after the landowner formally requested a Letter of Interpretation**. It was at that point—not before—that a so-called “wetland” plant species list was created.

During this return visit, DERM staff **photographed both the subject parcel and a neighboring lot**—a lot that DERM had previously ordered stripped down to **bare limestone caprock**. When questioned, DERM admitted these off-site images were used as justification because the parcel was “nearby,” confirming that **DERM relied on visual assumptions from a separate, altered property**.

Meanwhile:

- Over **90% of the subject property was and remains covered with potted nursery plants**, not naturally rooted vegetation.
- **No soil borings, no elevation survey, and no hydrologic measurements** were taken before or after the initial enforcement—despite legal requirements under **Rule 62-340, F.A.C.**
- DERM’s report lacked a **dated species inventory, GPS-tagged photographs, or baseline field data** required to support a wetland finding.

In response, the landowner submitted a **comprehensive scientific rebuttal**, referencing:

- The **USDA NRCS PLANTS Database**;
- The **U.S. Army Corps of Engineers' Technical Manual on Vegetation Delineation** (DTIC\_ADA533785); and
- **Florida Wetland Plants: An Identification Manual** by Tobe et al. (FDEP, 1998).

Every species in DERM's list was:

- **Scientifically reidentified** by binomial (Latin) name and documented with dated site photos;
- **Cross-referenced** against official wetland classification manuals and indicator status tables; and
- Found to consist of upland, facultative, ornamental, or nursery-grown species inconsistent with wetland conditions.

## **Legal and Ethical Violations:**

DERM's actions in this step violate multiple statutory and regulatory provisions:

1. **Rule 62-340.300(1)(a), F.A.C.** – Requires that hydrology be a primary indicator; no hydrologic testing was done.
2. **Rule 62-340.500(5), F.A.C.** – Prohibits reliance on vegetation alone without supporting hydrologic or soil indicators.
3. **§163.3162(4), Florida Statutes (Agricultural Lands and Practices Act)** – Prohibits local environmental regulation of bona fide agricultural lands without state or federal violation.
4. **§823.14, F.S. (Florida Right to Farm Act)** – Prohibits local enforcement that interferes with standard agricultural operations.
5. **§837.06, F.S. (False Official Statements)** – Potential violation if knowingly submitting false data in official agency reports.
6. **§838.022, F.S. (Official Misconduct)** – Criminal violation if public employees falsify, omit, or fabricate information to harm or deprive others of legal rights.
7. **Miami-Dade County Code of Ethics §§ 2-11.1(g), (h), (j)** – Violations for misuse of official position, failure to disclose conflicts of interest, and falsification of records.

## **Conclusion:**

This was not scientific delineation. It was **a retroactive fabrication** used to justify enforcement that had already been initiated—despite the absence of jurisdiction, soil testing, or lawful evidence. When confronted with scientific rebuttals, DERM ignored them. The agency's actions not only undermine the legal intent of **Rule 62-340**, but also violate multiple provisions of state law and local ethics ordinances.

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## Step 6: Invent the Violation First, Justify It Later

In Miami-Dade County, **DERM does not investigate to determine whether a violation exists—it decides in advance that one does, then builds a post hoc justification.** The enforcement timeline is reversed: the **citation is issued first**, and the **evidence is manufactured afterward**. Cease and Desist Orders are posted with **no testing, no data, and no site-specific survey**.

Once enforcement begins, DERM staff **return to the property days or weeks later**—not to conduct an impartial assessment, but to **fabricate a retroactive record** that will later be presented as having preceded the enforcement. These after-the-fact reports often:

- Include **photos taken on adjacent properties**;
- Rely on **selectively identified plants** or **staged images**;
- Are undated or timestamped **after enforcement began**;
- Omit or ignore **contradictory field data** submitted by landowners;
- Lack **mandatory soil, elevation, and hydrologic criteria** per Rule 62-340, F.A.C.

These altered reports then become part of the **administrative file**, which is transmitted to County attorneys and later to the court. Judges, relying on the County’s official record, are rarely aware that the entire factual basis for the case was created **after** enforcement began. **No neutral fact-finder** ever validates the original claim. Instead, the “legal record” is constructed **by the same agency bringing the charge**.

This process violates foundational principles of **due process**, including:

- The right to notice of the evidence against you;
- The right to confront and rebut claims made by the government;
- The right to an impartial hearing based on facts gathered in good faith.

## Legal Violations and Misconduct:

1. **Rule 62-340, F.A.C.** – Requires technical determinations of wetlands be based on field-verified hydrology, soils, and vegetation—not retroactive photos or speculation.
2. **§120.57(1)(b), Florida Statutes** – Requires that material facts in administrative proceedings be based on **competent substantial evidence**.
3. **§119.07(1)(a), F.S.** – Mandates accurate public records; falsified or incomplete administrative records violate this requirement.
4. **§837.06, F.S.** – Criminal offense to knowingly make false official statements in documents intended for public or legal use.
5. **§838.022, F.S.** – Official Misconduct: knowingly falsifying records or altering dates to justify unlawful enforcement may constitute criminal conduct.

6. **Miami-Dade County Code of Ordinances § 2-11.1(g), (h), (j)** – Ethical violations for misuse of official position, falsification of records, and acts contrary to the public trust.

## Conclusion:

This is not environmental protection. It is a **bureaucratic framing strategy**: issue the penalty first, then invent a scientific rationale later. The legal record becomes a tool of control, not truth. Once inside the courtroom, **the falsified timeline is nearly impossible to unwind**, especially for farmers and landowners without legal counsel.

This system does not tolerate rebuttal—it punishes it.

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## Step 7: DERMs Flip-Flop Defense – Classification vs. Delineation

When challenged, DERM claims no formal delineation was conducted—only a general classification. Yet when it serves their purpose, they flip the script and treat the property as if a full delineation under **Rule 62-340, F.A.C.** had been performed. The switch happens arbitrarily, often within the span of a single hour, depending on what justifies their next move.

This deliberate ambiguity is used to deflect legal responsibility while maintaining maximum enforcement pressure. By avoiding a formal delineation, DERM circumvents the procedural safeguards and scientific thresholds required by state law. At the same time, they impose fines, restrictions, and restoration demands as if their findings were final and legally binding. This tactic allows the agency to enforce without accountability—weaponizing uncertainty to deprive landowners of clear rights or remedies.

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## Step 8: Forward the Fraud to SFWMD to Escalate Enforcement

DERM transmits its fabricated enforcement reports directly to the **South Florida Water Management District (SFWMD)** to escalate regulatory action. Only DERM’s narrative is shared—**landowner rebuttals, scientific counter-evidence, and procedural objections are excluded**.

SFWMD, despite having **full access to real-time hydrologic data through DBHydro and MODFLOW**, chooses to rely on DERM’s false claims. Since **August 2024**, detailed water level reports, photos, and technical findings have been submitted by the landowner and made available to DERM—and by extension, to SFWMD. These reports directly contradict the wetland claims.

Yet SFWMD continues to act on **disproven assumptions**, escalating enforcement without verifying the evidence. This is not ignorance—it is **deliberate coordination**. A regulatory partner with the tools to uncover the truth has instead become **complicit in perpetuating the fraud**.

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## Step 9: Block Scientific Rebuttal and Suppress Public Records

DERM systematically blocks rebuttal evidence. File uploads vanish. Portals mysteriously stop working. Records are “lost” or denied. Farmers are stripped of the right to respond. Even after resubmitting data multiple times, DERM claims it never arrived. Transparency is deliberately sabotaged.

The DERM RER online portal presents a curated, one-sided record. All documents submitted by DERM staff appear clean, professionally formatted, and easy to access—often with detailed titles and timestamps. In contrast, landowner-submitted evidence is downgraded or digitally obscured: filenames are blank or garbled, formatting is corrupted, and many files are unviewable or unopenable. Publicly, the record appears complete, but in substance it is selectively edited.

This disparity is not a technical glitch—it is a calculated digital manipulation. By making DERM’s narrative pristine while rendering the farmer’s evidence visually impaired or inaccessible, the County creates a false appearance of credibility. This practice not only undermines fair adjudication, but also violates the **Florida Public Records Act (Chapter 119, F.S.)** and the spirit of **due process under the Fourteenth Amendment**.

A records system that silences one party while spotlighting another is not public transparency—it constitutes a deliberate distortion of the public record in favor of the prosecuting agency.

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## **Step 10: Oversight Loop – Complaints Misrouted and Dismissed**

When landowners submit formal complaints regarding DERM’s conduct, they don’t start an investigation—they trigger a bureaucratic evasion system.

- The **County Mayor’s Office** assigns a tracking number, then refers the complaint to **Animal Services**, even when the issue involves environmental fraud and regulatory abuse.
- The **Office of the Inspector General (OIG)** receives detailed complaints supported by public documentation already available on the **MDC DERM RER online portal**—including state and federal protections like **HB 909**, the **Right to Farm Act**, and **Public Law 101-229**. Yet, instead of acting, OIG returns the matter to **DERM**, the accused party.
- The **Miami-Dade State Attorney’s Office** remains silent, even after receiving full notice. No reply, no referral, no investigation—not even a courtesy response.

There is no need to resubmit evidence. It already exists in the County’s own systems. Yet these oversight bodies refuse to act—creating a closed loop of denial, delay, and deflection.

This is not a breakdown in communication—it’s **institutional obstruction**, shielding misconduct through intentional inaction.

## **Legal & Administrative Violations**

- **§112.313(6), Florida Statutes – Misuse of Public Position**  
Knowingly ignoring, misrouting, or concealing valid complaints—especially when all evidence is already on file—may constitute abuse of office and willful neglect of duty.
- **§112.324, F.S. – Ethics Commission Jurisdiction**  
Failing to refer credible complaints for independent review or shielding misconduct violates the statutory duty to uphold public ethics and accountability.

- **Florida Constitution, Article I, §9 & U.S. Constitution, 14th Amendment – Due Process Rights**

Blocking access to fair, impartial hearings or grievance procedures deprives landowners of fundamental constitutional protections under both state and federal law.

- **Chapter 119, Florida Statutes – Public Records Law**

When agencies ignore, delay, or reroute complaints tied to existing public records—especially records they themselves maintain—they violate Florida’s Sunshine Law and the principle of open government.

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## Step 11: Strip the Agricultural Exemption and Crush Financial Viability

In many cases, once DERM initiates enforcement—even without proving a valid wetland violation—a **chain reaction quietly begins**. The agency may notify the **Miami-Dade County Property Appraiser**, resulting in the **removal of the agricultural tax exemption**. This is often done **without verifying the facts**, without waiting for resolution, and **without notifying the landowner**.

No hearing. No appeal. Just a sudden reclassification—sometimes **retroactive**, inflating tax bills by thousands of dollars overnight. In cases where the land remains in active agricultural use, this removal is not only punitive but **legally unjustified**.

The result is **financial destabilization**. Even if the farmer continues lawful operations, the tax burden becomes unsustainable. The system is weaponized: **use taxation to break resistance**, and create conditions where landowners can no longer afford to hold their property.

## Legal and Statutory Violations

- **§193.461, Florida Statutes – Agricultural Classification of Lands**

Agricultural exemptions cannot be removed arbitrarily. Active, bona fide use must be evaluated fairly, not assumed void based on unrelated enforcement.

- **§163.3162, Florida Statutes (HB 909 – Agricultural Lands and Practices Act)**

Local governments are barred from indirectly penalizing farming operations under the guise of environmental enforcement. Stripping exemptions as retaliation likely exceeds local authority.

- **Florida Constitution, Article VII, §4 – Uniform Taxation**

Taxation must be applied equitably. Targeting farmers under enforcement without due process may violate constitutional protections.

- **42 U.S.C. §1983 – Civil Rights Act**

Removing lawful exemptions without process or factual basis can constitute a deprivation of property rights under color of law—opening the door to federal liability.

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## Step 12: Coerced Sales Disguised as Conservation

DERM’s enforcement strategy is designed to destroy land value through relentless citations, inflated tax assessments, and regulatory uncertainty. Once agricultural viability is crushed and the property is



devalued, the County offers a lifeline—a **buyout letter under the so-called “Willing Seller” program**.

But the offer is no rescue—it’s a final insult. These purchase offers are **a fraction of fair market value**, calculated not on what the land is worth, but on what it has been reduced to after years of government-induced economic hardship. This is not environmental stewardship. It’s **a rigged foreclosure process, orchestrated by the same agencies that caused the collapse**.

What begins as an enforcement action ends as a **land seizure by manipulation**. Productive farms are transformed into public land—not through eminent domain or compensation, but through **economic coercion masked as voluntary sale**.

This practice directly **violates the intent and statutory protections of Public Law 101-229—the Everglades National Park Protection and Expansion Act of 1989**. That law was created to guarantee that any land acquisition for restoration purposes be **voluntary, fair, and free from coercion**. It specifically protects communities like **Las Palmas**, which Congress intended to remain viable and intact.

Instead, **Miami-Dade County (through DERM) and the South Florida Water Management District (SFWMD)** have perverted the law’s intent. They are using **federal restoration funds** to **pressure landowners under duress**, weaponizing policy to force “voluntary” sales that are anything but. What Congress envisioned as **consensual conservation** has been turned into **a calculated forfeiture program**—a land grab masquerading as environmentalism.

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### Step 13: Circuit Court – Theater of Control

By the time a case reaches Circuit Court, most farmers still believe they’ll receive a fair hearing—that DERM is acting within lawful bounds, and that the judge will weigh the facts objectively. But the courtroom is not a check on DERM’s power—it’s the final stage of a process designed to legitimize it.

Judges are presented with **pre-assembled case files prepared by County attorneys**, built entirely on DERM’s version of events. Key documents—many of them **factually inaccurate, procedurally flawed, or based on fabricated field reports—go unchallenged**. The landowner is overwhelmed by legal jargon, denied meaningful discovery, and restricted from introducing new evidence.

This is not a venue for truth—it’s a **controlled environment where procedural traps and institutional bias favor the County**. No one explains the agency misconduct that built the case. No one questions how DERM’s initial enforcement action originated. The burden quietly shifts to the landowner, who is forced to prove innocence against a record already rigged for conviction.

The outcome is predictable: **pressured settlements, coerced compliance, and the quiet forfeiture of property rights**. Landowners leave believing they lost on merit—when in reality, the system was never designed to give them a fair chance.

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## Step 14: Procedural Delay and Legal Entrapment by Design

DERM's enforcement system is **intentionally structured to entrap landowners** in a slow, opaque process that deprives them of fundamental due process protections. Once a violation is issued, **motions are routinely ignored, hearing dates are delayed without cause, and there is no guaranteed access to a neutral forum or timely review.**

This deliberate delay exerts **economic and psychological pressure**—particularly on farmers, whose operations depend on uninterrupted land access and regulatory clarity. The longer the delay, the greater the leverage DERM gains to extract settlements, enforce compliance, or compel forfeiture. This violates the basic constitutional guarantee that **“no person shall be deprived of life, liberty, or property, without due process of law.”** (U.S. Const. amend. V; Fla. Const. art. I, § 9).

**Administrative hearings are fully controlled by DERM.** There is **no independent adjudicator, no automatic discovery rights, and no external oversight.** DERM staff act as **investigators, prosecutors, and hearing officials**—a structure that violates the principle of separation of functions required under **§ 120.57(1), Florida Statutes, and Florida Administrative Code Rule 28-106**, which call for impartial hearings in contested administrative proceedings.

As described in **Step 6** (“Invent the Violation First”) and **Step 9** (“Block Scientific Rebuttal”), by the time the case reaches Circuit Court for appeal, the **“official record” has already been manufactured**—excluding contradictory evidence, rebuttals, or scientific corrections submitted by the landowner. Circuit Court review under **§ 120.68, F.S.** is limited to the existing administrative record, and **no new evidence may be introduced**, effectively cementing DERM's one-sided narrative as unchallengeable.

This procedural design does not merely fail to meet constitutional due process standards—it **weaponizes delay and control** to transform judicial review into a **rubber stamp**, granting the illusion of legal legitimacy to what is, in effect, bureaucratic coercion.

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## Step 15: Interagency Complicity and the Money Pipeline

DERM's enforcement actions do not occur in a vacuum. Other agencies benefit—and therefore comply. Each citation issued becomes a trigger for a cascading flow of funding and performance metrics across local, state, and federal levels. This includes:

- **Eligibility for federal and state environmental grants;**
- **Increased line-item budgets and staffing allocations;**
- **Performance-based incentives and interagency compliance quotas;**
- **Access to matching funds tied to enforcement statistics.**

The financial incentives are indirect but substantial. Promotions, guaranteed pension tracks, consulting contracts, and post-agency employment are awarded to those who maintain the enforcement machine. The Miami-Dade Property Appraiser meets tax revenue targets by reclassifying properties. County legal departments bill hours defending actions they know are procedurally defective. The South Florida

Water Management District (SFWMD) meets its enforcement goals, often using DERM's reports without independent verification.

This is not environmental stewardship—it is institutionalized profiteering through regulatory overreach.

**The landowner becomes the involuntary donor to a bureaucratic revenue stream.**

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## Step 16: Exposing the Gravy Train – The Only Way to Stop It

Want to stop DERM? Expose the financial motive:

- **More violations = Bigger budgets.** Every citation is logged and used to justify higher funding during budget cycles. More “activity” equals more cash.
- **More takedowns = Grant compliance.** Environmental enforcement is tied to federal/state grant terms. Every enforcement action helps check boxes on performance metrics.
- **More agency activity = Performance bonuses.** Agencies report their enforcement stats to justify bonuses, promotions, and new staffing.
- **More propaganda = Job security.** Public outreach campaigns and PR spins are funded to defend agency actions. The more the public buys into the myth, the safer the budget line.

**Fabricated or procedurally invalid violations** are not just regulatory overreach—they're the foundation of a financial racket. **Demand independent audits. Request public financial disclosures. File ethics complaints. This isn't environmental enforcement—it's organized theft disguised as policy.**

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## Step 17: The OIG – Watchdog or Cover-Up Unit?

The Miami-Dade Office of the Inspector General (OIG) presents itself as an independent watchdog—but in practice, it operates as a **protective barrier for County agencies**, not a mechanism for accountability. Complaints alleging serious misconduct are frequently **rerouted back to the very departments named in the complaint**, often without independent inquiry, response, or resolution.

Allegations supported by factual evidence are quietly closed, redirected, or dismissed without meaningful review. Rather than investigating misconduct, the OIG appears to function as an **internal damage control unit**, shielding the County from exposure and liability.

The public is led to believe that oversight exists. In reality, the system is **engineered to protect insiders, not the residents it claims to serve.**

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## STOP CORRUPTION:

Expose the abuse. Name the players. Follow the money. File public records requests. Document the fraud. Submit to legislators. Report to media. Show the world that behind every Cease and Desist is a paycheck—and behind every “wetland” is a land grab.

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## WHO MUST BE INVESTIGATED

This corruption machine will not dismantle itself. It operates with internal protection, external funding, and systemic complicity. Only thorough, independent investigations—by ethical auditors, whistleblowers, and legal watchdogs—can expose the full scale of abuse. The following agencies and actors must be immediately investigated:

- **DERM Directors and Field Biologists**

Investigate the misuse of dual enforcement roles, the creation of false or misleading environmental reports, and repeated abuse of **Chapter 24 of the Miami-Dade County Code**. Scrutinize all employees who issue citations and simultaneously serve as fact witnesses.

- **Miami-Dade County Attorney's Office**

Audit all legal filings where County Attorneys may have presented or defended knowingly false, incomplete, or retroactive enforcement records in administrative and judicial proceedings.

- **Miami-Dade Property Appraiser's Office**

Examine how agricultural exemptions are systematically stripped following DERM enforcement—often without hearings, evidence, or notice—resulting in unlawful tax increases and economic coercion.

- **South Florida Water Management District (SFWMD)**

Investigate the use of fabricated or unverified DERM reports in issuing enforcement actions, permit denials, or compliance referrals. Determine whether federal wetland protocols (e.g., **Rule 62-340, F.A.C.**) were bypassed in favor of DERM's unsupported claims.

- **Federal and State Grant Administrators**

Conduct forensic audits of funding streams tied to local environmental enforcement metrics. Follow the money—especially where citations generate eligibility for performance-based grants, staffing budgets, or matching funds.

- **Miami-Dade Office of the Inspector General (OIG)**

Investigate the OIG itself for procedural failures, willful blind-eye referrals back to DERM, and its pattern of dismissing or whitewashing citizen complaints despite credible evidence of wrongdoing.

- **Miami-Dade County Commission**

Hold Commissioners accountable for approving annual DERM budgets, ignoring public complaints, and enabling continued abuse through willful neglect of oversight duties.

- **Environmental Grant Writers and Private Consultants**

Investigate individuals and firms who profit from enforcement-driven funding, especially where they have worked on both policy drafting and post-enforcement grant procurement. Assess for conflicts of interest, collusion, and insider contracting.

This is your roadmap. This is your evidence. Use it to restore accountability.

Expose the Gravy Train. Burn the tracks.

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**Prepared by:** [www.MiamiDade.watch](http://www.MiamiDade.watch)

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