



*Honesty - Integrity - Character*

**Palm Beach County**

**Commission on Ethics**

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West Palm Beach, FL 33401

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**Commissioners**

Michael H. Kugler  
Kristin A. Vara-Garcia  
Peter L. Cruise  
Michael S. Kridel  
Rodney G. Romano

**Executive Director**

Christie Kelley

**General Counsel**

Rhonda Giger

**Intake & Compliance Manager**

Gina A. Levesque

**Education & Communications Manager**

S. Lizabeth Martin

**Investigator**

Mark A. Higgs

**Investigator**

Abigail Irizarry

# *Amended Agenda*

March 7, 2024 – 1:30 p.m.

Governmental Center,  
301 North Olive Avenue, 6<sup>th</sup> Floor  
Commissioners Chambers

**Meeting will begin at 1:30pm  
Executive Session will begin at 1:45pm  
Regular Agenda will resume immediately  
following Executive Session**

- I. Call to Order
- II. Pledge of Allegiance
- III. Swearing in ceremony by Judge Danielle Sherriff
- IV. Roll Call
- V. Nomination and election of new Chairperson (to begin presiding over meeting immediately upon election)
- VI. Nomination and election of new Vice Chairperson
- VII. Introductory Remarks
- VIII. Approval of Minutes
  - a. January 11, 2024
  - b. February 1, 2024
- IX. Executive Session
  - a. C23-026
  - b. C23-031
- X. Executive Director Comments
- XI. Commission Comments
- XII. Public Comments
- XIII. Adjournment

If a person decides to appeal any decision made by this Commission with respect to any matter considered at this meeting or hearing, (s)he will need a record of the proceedings, and that, for such purpose, (s)he may need to ensure that a verbatim record of the proceedings is made, which record includes the testimony and evidence upon which the appeal is to be based.

**OFFICIAL MEETING MINUTES  
OF THE  
PALM BEACH COUNTY COMMISSION ON ETHICS (COE)  
PALM BEACH COUNTY, FLORIDA**

**JANUARY 11, 2024**

**THURSDAY  
1:30 P.M.**

**COMMISSION CHAMBERS  
WEISMAN GOVERNMENTAL CENTER**

**MEMBERS:**

Michael H. Kugler, Chair  
Kristin A. Vara-Garcia, Vice Chair  
Peter L. Cruise  
Michael S. Kridel  
Rodney G. Romano

**COUNTY STAFF PRESENT:**

Rhonda Giger, General Counsel  
Mark. A. Higgs, COE Investigator II  
Abigail Irizarry, COE Investigator II  
Christie E. Kelley, COE Director III  
Gina A. Levesque, COE Intake and Compliance Manager  
S. Lizabeth Martin, COE Communication and Education Manager

**CLERK OF THE CIRCUIT COURT & COMPTROLLER'S OFFICE STAFF PRESENT:**

Danielle Freeman, Deputy Clerk  
Jillian Zalewska, Deputy Clerk

**I. Call to Order**

The chair called the meeting to order at 1:32 p.m.

**II. Pledge of Allegiance**

Chair Kugler led the Pledge of Allegiance.

**III. Roll Call**

**Present:** Chair Michael H. Kugler, Vice Chair Vara-Garcia, and Commissioner Michael S. Kridel

**Absent:** Commissioner Peter L. Cruise and Commissioner Rodney G. Romano

#### **IV. INTRODUCTORY REMARKS**

No remarks were made.

#### **V. APPROVAL OF MINUTES FROM DECEMBER 14, 2023**

**MOTION to approve the December 14, 2023, meeting minutes. Motion by Vice Chair Vara-Garcia, seconded by Commissioner Kridel, and carried 3-0.**

#### **VI. PROCESSED ADVISORY OPINIONS (CONSENT AGENDA)**

a. RQO 23-030

b. RQO 24-001

**MOTION to approve the consent agenda. Motion by Vice Chair Vara-Garcia, seconded by Commissioner Kridel, and carried 3-0.**

#### **VII. ITEMS PULLED FROM CONSENT AGENDA**

No items were pulled from the consent agenda.

#### **VIII. 2023 ANNUAL REPORT PRESENTATION**

Ms. Kelley gave a brief overview of the 2023 Annual Report, that included a review of the COE mission, customer satisfaction surveys, plans to update the COE website, and upcoming projects for 2024.

A discussion ensued between Commissioner Kridel and Ms. Kelley regarding details of the annual report.

#### **IX. EXECUTIVE SESSION RE: C23-032**

#### **RECESS**

**At 1:46 p.m., the chair declared the meeting recessed for an executive session.**

#### **RECONVENE**

**At 2:20 p.m., the meeting reconvened with Chair Kugler, Vice Chair Vara-Garcia, and Commissioner Kridel present.**

Vice Chair Vara-Garcia read the final order for the record.

**RE: C23-032**

Christie Kelley, Executive Director of the Palm Beach County Commission on Ethics (COE), filed the above-referenced complaint against Respondent, Carolyn Cassidy, a Commissioner for the Town of Ocean Ridge, alleging that Respondent used or attempted to use her position in a manner that may have resulted in a special financial benefit to herself or her outside business in violation of Section 2-443(a) of the Palm Beach County Code of Ethics.

Pursuant to Sec. 2-258(a)1 of the Palm Beach County Commission on Ethics Ordinance, the COE is empowered to enforce the Palm Beach County Code of Ethics.

In lieu of a probable cause hearing, the COE advocate recommended the issuance of a letter of instruction and a dismissal of the complaint. This recommendation is based on the Respondent's self-reporting of the incident and the facts elicited in the investigation.

Pursuant to Commission on Ethics Ordinance Sec. 2-260.3(b), Dismissal of complaints, the complaint may be dismissed and a letter of instruction issued at this stage of the proceedings if the Commission finds that the violation was inadvertent, unintentional, or insubstantial.

Therefore it is:

**ORDERED AND ADJUDGED** that the complaint against Respondent, Carolyn Cassidy, is hereby DISMISSED and a Letter of Instruction is issued.

**DONE AND ORDERED** by the Palm Beach County Commission on Ethics public session on this 11th day of January, 2024.

**X. Executive Director Comments**

Ms. Kelley made the following comments:

1.

On Tuesday, January 23, 2024, from 9 a.m. to 12 p.m. there would be a “meet and greet” with the committee to answer any questions and the event was open to the public.

2.

Ms. Kelley reminded everyone to save the date for the Regional High School Ethics Bowl on Saturday, January 27, 2024.

**XI. Commission Comments**

Chair Kugler requested information from Ms. Kelley regarding the permissibility of using one's official title in advertisements, to which Ms. Kelley responded it varied from case to case.

**XII. Public Comment**

No comments were made.

**XIII. Adjournment**

**At 2:24 p.m., the chair declared the meeting adjourned.**

APPROVED:

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Chair/Vice Chair

**OFFICIAL MEETING MINUTES  
OF THE  
PALM BEACH COUNTY COMMISSION ON ETHICS (COE)  
PALM BEACH COUNTY, FLORIDA**

**FEBRUARY 1, 2024**

**THURSDAY  
1:30 P.M.**

**COMMISSION CHAMBERS  
WEISMAN GOVERNMENTAL CENTER**

**MEMBERS:**

Michael H. Kugler, Chair  
Kristin A. Vara-Garcia, Vice Chair  
Peter L. Cruise  
Michael S. Kridel  
Rodney G. Romano

**COUNTY STAFF PRESENT:**

Rhonda Giger, General Counsel  
Abigail Irizarry, COE Investigator II  
Christie E. Kelley, COE Director III  
Gina Levesque, COE Intake and Compliance Manager

**CLERK OF THE CIRCUIT COURT & COMPTROLLER'S OFFICE STAFF PRESENT:**

Alyssa Berg, Board Meetings Specialist

**I. Call to Order**

The chair called the meeting to order at 1:30 p.m.

**II. Pledge of Allegiance**

Commissioner Romano led the Pledge of Allegiance.

**III. Roll Call**

All members were present.

**IV. INTRODUCTORY REMARKS**

~~No remarks were made.~~ There were no introductory remarks.

**V. PROCESSED ADVISORY OPINIONS (CONSENT AGENDA)**

a. RQO 24-002

**MOTION to approve the consent agenda. Motion by Commissioner Cruise, seconded by Vice Chair Vara-Garcia, and carried 5-0.**

**VI. ITEMS PULLED FROM THE CONSENT AGENDA**

No items were pulled from the consent agenda.

**VII. Executive Director Comments**

Ms. Kelley stated that an amendment had been added to Senate Bill 7014 that~~which~~ included a~~the~~ prohibition of self-initiated complaints by local ethics agencies. She also said the COE's office had diligently begun drafting a statement opposing the amendment to the bBill.

A physical draft of the statement was distributed amongst the Board~~to the commissioners~~ for review.

Ms. Kelley thanked Ms. Levesque for her assistance with the statistics.

Discussion ensued regarding the distribution of the statement upon finalization.

**MOTION to approve the drafted statement opposing the added amendment to Senate Bill 7014 and to direct staff to take the necessary actions. Motion by Commissioner Romano, seconded by Commissioner Cruise, and carried 5-0.**

Discussion ensued regarding the amendment to Senate Bill 7014, and Ms. Kelley responded to questions from the Board~~commission~~.

**VIII. Commission Comments**

Commissioner Cruise thanked Vice Chair Vara-Garcia and staff for their participation in the Eethics Bowl ~~that was held~~ at Florida Atlantic University. He invited everyone to attend next year.

Commissioner Romano thanked Ms. Levesque and Ms. Kelley for their promptness in preparing the statement for the commission.

**IX. Public Comments**

No comments were made.

**X. Adjournment**

**At 1:41 p.m., the chair declared the meeting adjourned.**

APPROVED:

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Chair/Vice Chair