



# All About Advisory Opinions

Advisory opinions from the Palm Beach County Commission on Ethics are . . .

## ...an Essential Function!

The COE is authorized by ordinance to render advisory opinions with regard to questions concerning the applicability or interpretation of the PBC Code of Ethics, PBC Lobbyist Registration Ordinance, and the PBC Post-Employment Ordinance.

## ...Proactive!

Advisory opinions are available to help individuals under the jurisdiction of the COE stay in compliance with the three ordinances. The motto of the COE is **“Ask First, Act Later.”** That means you need to reach out to us for guidance before acting on any potential conflicts of interest or accepting any questionable gifts because the COE cannot provide advisory opinions on issues that have already occurred.

The requestor can rely on holding of the advisory opinion as long as the facts and circumstances submitted by the requestor have **fully disclosed all relevant facts** and the requestor **complied with the requirements outlined in the opinion.**

## ...Available to Anyone Under the COE’s Jurisdiction!

Anyone who is subject to the three ordinances over which the COE has jurisdiction may request an advisory opinion on an issue related to himself or herself.

## ...Easy to Request!

To request an ethics opinion, send a detailed email with your question/issue and all of the facts involved to [ethics@palmbeachcountyethics.com](mailto:ethics@palmbeachcountyethics.com).

## ...Easy to Access Online!

With over 450 advisory opinions already published, many questions can be answered through prior advisory opinions which are available on our website or can be emailed to requestors. Proposed advisory opinions are usually completed within 15 days. The advisory opinions are then reviewed and voted on by the COE commissioners at their monthly meetings.

**The COE welcomes Michael H. Kugler and Carol E.A. DeGraffenreidt to the Commission**

On March 5, 2020, they were sworn in as COE Commissioners by former COE Chair and 15<sup>th</sup> Judicial Circuit Judge Sarah Shullman. They will serve four year terms.

**Commissioner Kugler** was appointed by the F. Malcolm Cunningham, Sr. Bar Association, the Hispanic Bar Association of Palm Beach County, and the Palm Beach County Bar Association. Currently an attorney with Searcy Denney Scarola Barnhart & Shipley, PA. Kugler began his legal career at the Office of the State Attorney in Palm Beach County. With over 100 jury trials, Kugler prosecuted every crime from DUI to Capital Sexual Battery to the Death Penalty. As a vital member of the Special Victims Unit, Kugler prosecuted the most violent predators in our community and gave a voice to child victims of sexual abuse. Kugler is a member of the Sexual Assault Response Team (SART) for Palm Beach County which created and runs the county's first dedicated sexual assault examination site, which coordinates the medical, law enforcement, forensic, and legal response to sexual violence in the community.



**Commissioner DeGraffenreidt** was appointed by the Palm Beach County Association of Chiefs of Police. DeGraffenreidt received her undergraduate degree from Spelman College and her juris doctor from the University of Maryland School of Law. Currently a Senior Assistant Attorney General for the Consumer Protections Division of the Florida Attorney General's Office, DeGraffenreidt began her legal career at the Office of the State Attorney in Broward County, where she was the first black female Assistant State Attorney. DeGraffenreidt also served as an Assistant United States Attorney for the Southern District of Florida in the civil and criminal divisions. DeGraffenreidt has been the lead attorney in over 100 criminal and civil trials.



**Congratulations to Commissioner Peter L. Cruise who was elected COE Chair and Commissioner Michael S. Kridel who was elected COE Vice Chair for two year terms.**

*Ask First, Act Later*

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