



Honesty - Integrity - Character

**Palm Beach County
Commission on Ethics**

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News Release

For immediate release:

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Summary of Palm Beach County Commission on Ethics Meeting Held on February 6, 2020.

The Palm Beach County Commission on Ethics (COE) took the following actions at its monthly public meeting held on February 6, 2020.

Sarah Shullman and Bryan Kummerlen, COE commissioners, and Anthony Bennett, former COE Chief Investigator, were recognized for their service to the COE. Ms. Shullman was recently appointed county court judge by Governor DeSantis and had to resign her position with the COE. Mr. Kummerlen's term as COE commissioner ends March 1, 2020. Mr. Bennett was hired as the investigations supervisor for the Palm Beach County Office of Inspector General.

One complaint was heard in executive session. The complete file is published on the COE website at: <http://www.palmbeachcountyetics.com/complaints.htm>.

C19-004: After considering the investigative report, probable cause recommendation, and statement of the COE advocate and respondent, the COE issued a letter of instruction and dismissed the complaint because the evidence indicated that the violation was inadvertent, unintentional, or insubstantial.

Three advisory opinions were approved. The full opinions are published and available at: <http://www.palmbeachcountyetics.com/opinions.htm>.

RQO 20-001: A former county employee asked what restrictions the Post Employment Ordinance places on him seeking employment with an entity that is a vendor of the county?

The COE opined as follows: The Post Employment Ordinance, which would apply employment restrictions on certain county officials and employees, would not apply to him because he was not a county commissioner, a Level 1 employee, or a Level 2 employee. Even if the ordinance did apply to him, he would not be prohibited from accepting this type of employment because it would not involve representing anyone at a proceeding before the Board of County Commissioners or any personal communications made with officials or employees of the county.

RQO 20-002: The city attorney for the city of Delray Beach asked if the Palm Beach County Code of Ethics (code) prohibits city officials and employees from accepting tickets to the Delray Beach Open Tennis Tournament from the city.

The COE opined as follows: City officials and employees are not prohibited from accepting these tickets because the tickets are an inseparable part of the contract between the vendor and the city. Because the city is paying for these tickets through the contract, it is not prohibited from distributing the tickets to its officials or employees. However, city officials and employees must report the tickets as gifts from the city if the value exceeds \$100.

RQO 20-003: A prospective county employee asked what restrictions would the code place on her regarding outside employment if she accepts a position with the county.

The COE opined as follows: The code prohibits her from entering into any contracts with any entity where she would be providing services to the county or where the county would pay for her services through her contract with the entity. The code's prohibition on contractual relationships also applies to any ongoing contracts she entered into prior to her employment with the county.

A detailed explanation of all agenda items is available at <http://www.palmbeachcountyetics.com/meetings.htm>.

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