



Honesty - Integrity - Character

Palm Beach County

Commission on Ethics

300 North Dixie Highway, Ste 450

West Palm Beach, FL 33401

561.355.1915

Hotline: 877.766.5920

E-mail: ethics@pbcgov.org

Commissioners

Rodney G. Romano

Alan I. Blass

Peter L. Cruise

Michael H. Kugler

Kristin A. Vara-Garcia

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

Agenda

June 4, 2026 – 1:30 p.m.

Governmental Center,
301 North Olive Avenue, 6th Floor
Commissioners Chambers

- I. Call to Order
- II. Pledge of Allegiance
- III. Roll Call
- IV. Introductory Remarks
- V. Approval of Minutes
 - a. April 16, 2026
 - b. May 7, 2026
- VI. Processed Advisory Opinions (Consent Agenda)
 - a. RQO 26-011
 - b. RQO 26-012
- VII. Items Pulled from Consent Agenda
 - a.
- VIII. Executive Director Comments
- IX. Commission Comments
- X. Public Comments
- XI. 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**

APRIL 16, 2026

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

**COMMISSION CHAMBERS
WEISMAN GOVERNMENTAL CENTER**

MEMBERS:

Rodney G. Romano, Chair
Allan I. Blass, Vice Chair
Peter L. Cruise
Michael H. Kugler
Kristin A. Vara-Garcia

COMMISSION ON ETHICS STAFF PRESENT:

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

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

Danielle Freeman, Deputy Clerk
Samantha Giarratana, Board Meetings Specialist

ALSO PRESENT:

Michael S. Kridel

I. Call to Order

The vice chair called the meeting to order at 1:38 p.m.

II. Pledge of Allegiance

The commissioners recited the Pledge of Allegiance.

III. Roll Call

Present: Vice Chair Blass, Commissioner Cruise, and Commissioner Kugler

Absent: Chair Romano and Commissioner Vara-Garcia

IV. Introductory Remarks

No introductory remarks were made.

V. Approval of Minutes from March 5, 2026

MOTION to approve the minutes. Motion by Commissioner Kugler, seconded by Commissioner Cruise, and carried 3-0.

VI. Presentation to Former Commissioner Michael S. Kridel

Ms. Kelley presented Former Commissioner Michael S. Kridel with a gift and expressed appreciation for his service on the COE.

Former Commissioner Kridel shared his experiences while serving on the COE committee.

Vice Chair Blass, Commissioner Kugler, Commissioner Cruise, and Inspector General John Carey expressed appreciation for Commissioner Kridel's years of service.

VII. Processed Advisory Opinions (Consent Agenda)

- a. RQO 26-005
- b. RQO 26-006
- c. RQO 26-007
- d. RQO 26-008

MOTION to approve the consent agenda. Motion by Commissioner Cruise, seconded by Commissioner Kugler, and carried 3-0.

VII. Items pulled from Consent Agenda

- a.

No items were pulled from the consent agenda.

VIII. Executive Session – C25-013

RECESS

At 1:53 p.m., the chair declared the meeting recessed for executive session.

RECONVENE

At 2:28 p.m., the meeting reconvened with Vice Chair Blass and Commissioner Kugler present.

Commissioner Kugler read the final order into the record:

In re: Barbara King

C25-013

Complainant, Napoleon Collins, filed the above-referenced complaint, alleging Respondent, Barbara King, and elected official for the City of South Bay, violated Section 2-443(a), Misuse of office or position, of the Palm Beach County Code of Ethics, by attempting to use her position as commissioner to intervene on a matter unrelated to her official duties.

Pursuant to Section 2-258(a)¹ of the Palm Beach County Commission on Ethics Ordinance, the Palm Beach County Commission on Ethics is empowered to enforce the Palm Beach County Code of Ethics. In lieu of a probable cause hearing, Respondent further stipulated to probable cause and entered into a negotiated settlement agreement with the Advocate. This agreement, which included a Letter of Reprimand, was submitted to the Commission for approval. Respondent further stipulated to the facts and circumstances set forth in the Letter of Reprimand. Based on those facts, Respondent admitted to violating Section 2-443(a) of the Palm Beach County Code of Ethics and agreed to accept a Letter of Reprimand and a finding that the violation was intentional. The determination as to whether a fine should be imposed was left to the Commission. The Commission accepted the terms of the negotiated settlement, issued a letter of Reprimand, and ordered a fine the amount of \$250.

Pursuant to Commission on Ethics Ordinance Section 2-260.1, *Public hearing procedures*, the Commission found that there was clear and convincing evidence contained within the record to support a finding that the violation was intentional and that the Respondent has acknowledged that her actions violated the Palm Beach County Code of Ethics.

Therefore it is:

ORDERED AND ADJUDGED this matter is concluded upon the issuance of a Letter of Reprimand and a fine \$250.

DONE AND ORDERED by the Palm Beach County Commission on Ethics in executive session on this 16th day of April 2026.

VII. Executive Director Comments

Ms. Kelley reported the following updates:

1.

Staff attended a Junior Achievement event at Cholee Lake Elementary School and Jupiter High School.

2.

Staff presented a COE overview to the League of Women Voters, and they participated in an outreach event at the City of Palm Beach Gardens Vendor Open House and Workshop.

3.

Staff conducted ethics trainings for the Palm Beach County Behavioral Health Substance Use Co-Occurring Advisory Committee and for various municipalities in the county.

4.

On Tuesday, April 14th, the Board of County Commissioners (BCC) approved moving forward with the advertised changes to the COE's ordinance, and the subsequent public hearing would take place on May 5th at 9:30 a.m.

XI. Public Comments

There were no public comments.

VIII. Commissioner Comments

No comments were made.

XII. Adjournment

At 2:32 p.m., the chair declared the meeting adjourned.

APPROVED:

Chair/Vice Chair

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

MAY 7, 2026

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

**COMMISSION CHAMBERS
WEISMAN GOVERNMENTAL CENTER**

MEMBERS:

Rodney G. Romano, Chair
Allan I. Blass, Vice Chair
Peter L. Cruise
Michael H. Kugler
Kristin A. Vara-Garcia

STAFF PRESENT:

Mark Higgs, COE Investigator II
Abigail Irizarry, COE Investigator II
Christie E. Kelley, COE Director III
Gina Levesque, Intake and Compliance Manager
S. Lizbeth Martin, Communications and Education Manager
Kavanaugh Simpson, COE Intern

CLERK OF THE CIRCUIT COURT & COMPTROLLER'S OFFICE

Karla Perez, Deputy Clerk

I. Call to Order

The chair called the meeting to order at 1:40 p.m.

UNSCHEDULED ITEM

The commissioners recited the Pledge of Allegiance.

II. Introductory Remarks

No comments were made.

III. Roll Call

Present: Chair Romano, Vice Chair Blass, and Commissioner Cruise

Absent: Commissioner Kugler and Commissioner Vara-Garcia

IV. Processed Advisory Opinions (Consent Agenda)

a. RQO 26-010

MOTION to approve the consent agenda. Motion by Vice Chair Blass, seconded by Commissioner Cruise, and carried 3-0.

V. Items Pulled from Consent Agenda

No items were pulled from the consent agenda.

VI. Executive Director Comments

Ms. Kelley reported the following updates:

1.

Staff attended many outreach events last month at the West Boca Library.

2.

Staff conducted in-person ethics training at the Town of Juno Beach.

3.

Staff delivered presentations at various municipalities.

4.

The Spring-Summer 2026 newsletter had been finalized and would be distributed to all liaisons, municipalities, as well as the County.

5.

The online training materials were being updated, with a completion date of Mid-June 2026.

6.

On Tuesday, May 5, 2026, the Board of County Commissioners (BCC) approved the amendments to the COE's ordinance, noting full compliance with state law.

7.

It was announced that today was COE Intern Kevaughn Simpson's last day, and he was recognized for his leadership and dedication in the COE office. A new promotional brochure that Kevaughn helped create for the COE was also introduced and would be available soon.

8.

Inspector General John Carey was thanked for his leadership and dedicated service to the community.

VII. Commission Comments

Commissioner Cruise stated that his delay to the meeting was due to a zoom conference with the FAU President and noted that he would convey the well wishes.

VIII. Public Comments

No comments were made.

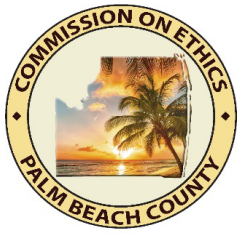
IX. Adjournment

At 1:44 P.M., the chair declared the meeting adjourned.

MOTION to adjourn. Motion by Commissioner Cruise, seconded by Vice Chair Blass, and carried 3-0.

APPROVED:

Chair/Vice Chair



Palm Beach County Commission on Ethics

Commissioners
Rodney G. Romano, Chair
Alan I. Blass, Vice Chair
Peter L. Cruise
Michael H. Kugler
Kristin A. Vara-Garcia

Executive Director
Christie Kelley

Honesty - Integrity - Character

May 15, 2026

Michael Gauger, Assistant Deputy of Strategic Projects
Planning, Zoning & Building Department
2300 N. Jog Road
West Palm Beach, FL 33411

Re: RQO 26-011
Outside Business/Employment

Dear Mr. Gauger,

Your request for an advisory opinion to the Palm Beach County Commission on Ethics (COE) has been received and reviewed. The opinion rendered is as follows:

QUESTION:

Does the Palm Beach County Code of Ethics (Code) impose any restrictions upon you as a Palm Beach County (county) employee if you were to start a contracting business?

BRIEF ANSWER:

Generally, the Code would not prohibit you from working as a contractor in your private capacity as long as you do not enter into a contract or transaction, either directly or indirectly, with the county, and you follow the rest of the requirements as described in this advisory opinion.

FACTS:

You are employed with the county's Department of Planning, Zoning, and Building as the Assistant Deputy of Strategic Projects. You hold an inactive State of Florida Certified Building Contractor license and may soon reactivate that license to create a private contracting business.

If you do so, your contracting business will not engage in work for the county in a vendor or subcontractor capacity. Additionally, the business would not perform work within any unincorporated areas of the county that fall under the county's regulatory authority. Any building contractor work would be limited to municipalities within the county that are governed and regulated by their own independent building departments.

You anticipate the work would primarily involve preparing permits and completing the application process within municipalities as well as performing work for homeowners and personally owned properties that are located outside of the areas covered by your county work responsibilities or authority.

Any work you would perform for your outside business would be conducted entirely outside of your county work hours. Additionally, you understand and acknowledge that county resources, equipment, or time will not be used in connection with any outside employment or business activities. Before you move forward with the outside business, you want to ensure full compliance

with the ethical requirements of the Code and want to be aware of any potential conflicts or other restrictions that may apply.

ANSWER:

Section 2-443(d) of the Code prohibits public officials or employees, their outside business, or their outside employer from entering into a contract or other transaction for goods or services, directly or indirectly, with their public employer, unless an exception applies.¹ The Code defines an "outside business" as any entity located in the county, or which does business with or is regulated by the county or a municipality as applicable, in which the official or employee has an ownership interest. Therefore, both you and your outside business would be prohibited from entering into any contract or other transaction with the county unless at least one of the exceptions listed in Section 2-443(e) applies. Additionally, the COE has previously held that Section 2-443(d) also prohibits you or your outside business from entering into any contractual relationships with a vendor of the county if you would be providing goods or services to the county through that contract.² This would create an indirect contract between you and the county and would violate the Code. The Code also prohibits public officials or employees from using official work time or resources, software, or equipment in furtherance of their outside employment or outside business activities.³

Based on the facts provided, you have stated that neither you nor your outside business intends to enter into transactions with the county and that any outside contracting activities would be performed entirely outside of county work hours and without the use of county resources or equipment. This opinion is premised upon those representations which must be adhered to at all times, and a strict separation between your county employment and outside business activities must always be maintained

You are reminded that in the future, should an opportunity to enter into a contract with the county arise, such activity would only be permissible if an exception applies. Moreover, if you and your outside business were to enter into any contract or other transaction for services with a vendor of the county, you must ensure that, absent an applicable exception, you are not indirectly providing a service to the county through that contract.

As long as the above guidance is followed, the Code does not restrict the operation of your outside business within the county and you are free to engage with clients wherever they are located, including other state, federal, local, or municipal government entities, excluding the county, which is your public employer.

Although the Code does not prohibit this type of work in your private capacity, you would have an ongoing responsibility to refrain from using your official position with the county to give a special financial benefit to yourself or your outside business.⁴ This would include using your position to influence another person to take some action, which would give a special financial benefit to yourself or your outside business; soliciting business during your county work hours or using your county email; or identifying yourself as a county employee in an attempt to obtain a customer, including providing any written or verbal communication using your title or position with the county. It should be noted that the Code does not prohibit you from including your county employment

¹ Sec. 2-443(d), *Contractual relationships*

² RQO 10-038, RQO 16-001, RQO 16-006, RQO 19-019

³ Sec. 2-443(a), *Misuse of public office or employment*; Sec. 2-443(b), *Corrupt misuse of official position*

⁴ Section 2-443(a), *Misuse of public office or employment*

and title on your resume as part of describing your professional background and experience.⁵ A resume is generally understood to be a summary of an individual's employment history, qualifications, and education, and the mere listing of such information does not constitute a violation of the Code of Ethics. Finally, you are reminded that you must ensure that you comply with the county's rules regarding outside employment.

LEGAL BASIS:

The legal basis for this opinion is found in Sec. 2-442, Sec. 2-443(a), Sec. 2-443(d), and Sec. 2-443(e) of the Code:

Sec. 2-442. Definitions.

Outside employer or business includes:

- (2) Any entity located in the county or which does business with or is regulated by the county or municipality as applicable, in which the official or employee has an ownership interest. For purposes of this definition, an "ownership interest" shall mean at least five (5) percent of the total assets or common stock owned by the official or employee or any combination of the official or employee's household members, spouse, child, step-child, brother, sister, parent or step-parent, or a person claimed as a dependent on the official or employee's latest individual federal tax return.

Sec. 2-443. Prohibited conduct.

- (a) ***Misuse of public office or employment.*** An official or employee shall not use his or her official position or office, or take or fail to take any action, or influence others to take or fail to take any action, or attempt to do any of these things, in a manner which he or she knows or should know with the exercise of reasonable care will result in a special financial benefit, not shared with similarly situated members of the general public, for any of the following persons or entities:
 - (1) Himself or herself;
 - (4) An outside employer or business of his or hers, or of his or her spouse or domestic partner, or someone who is known to such official or employee to work for such outside employer or business;
- (d) ***Contractual relationships.*** No official or employee shall enter into any contract or other transaction for goods or services with his or her respective county or municipality. This prohibition extends to all contracts or transactions between the county or municipality as applicable or any person, agency or entity acting for the county or municipality as applicable, and the official or employee, directly or indirectly, or the official or employee's outside employer or business. Any such contract, agreement, or business arrangement entered into in violation of this subsection may be rescinded or declared void by the board of county commissioners pursuant to section 2-448(c) or by the local municipal governing body pursuant to local ordinance as applicable. This prohibition shall not apply to employees who enter into contracts with Palm Beach County or a municipality as part of their official duties with the county or that municipality. This prohibition also shall not apply to officials or employees who purchase goods from the county or municipality on the same terms available to all members of the public.
- (e) Exceptions and waiver.
In addition, no official or employee shall be held in violation of subsection (d) if:

⁵ RQO 16-022

- (1) The business is awarded under a system of sealed, competitive bidding to the lowest bidder and:
 - a. The official or employee, or his or her relative or household member, has in no way participated in the determination of the bid specifications or the determination of the lowest bidder;
 - b. The official or employee, or his or her relative or household member, has in no way used or attempted to use the official or employee's influence to persuade the agency, governmental entity or any personnel thereof to enter such a contract other than by the mere submission of the bid; and
 - c. The official or employee, prior to or at the time of the submission of the bid, has filed a statement with the supervisor of elections and the commission on ethics, disclosing the nature of the interest in the outside employer or business submitting the bid.
- (2) An emergency purchase or contract, which would otherwise violate a provision of subsection (d), must be made in order to protect the health, safety, or welfare of the citizens of the county or municipality as applicable.
- (3) The outside employer or business involved is the only source of supply within the county or municipality under applicable law or county or municipal policy, and there is full disclosure by the official or employee of his or her interest in the outside employer or business to the county or municipality as applicable and the ethics commission prior to the purchase, rental, sale, leasing, or other business being transacted.
- (4) The total amount of the contracts or transactions in the aggregate between the outside employer or business and the county or municipality as applicable does not exceed five hundred dollars (\$500) per calendar year.

This opinion construes the Palm Beach County Code of Ethics Ordinance and is based upon the facts and circumstances that you have submitted. The Palm Beach County Commission on Ethics does not investigate the facts and circumstances submitted but assumes they are true for purposes of this advisory opinion. It is not applicable to any conflict under state law. Inquiries regarding possible conflicts under state law should be directed to the State of Florida Commission on Ethics.

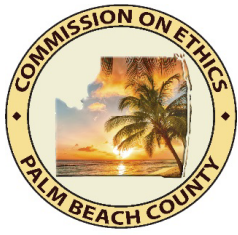
Please feel free to contact me at 561-355-1915 if you need further assistance in this matter.

Sincerely,



Christie Kelley,
Executive Director

RG/gl



Palm Beach County Commission on Ethics

Commissioners
Rodney G. Romano, Chair
Alan I. Blass, Vice Chair
Peter L. Cruise
Michael H. Kugler
Kristin A. Vara-Garcia

Executive Director
Christie Kelley

Honesty - Integrity - Character

May 26, 2026

Yelizaveta "Liz" Herman, Assistant County Attorney
Palm Beach County Attorney's Office
301 N. Olive Avenue, Suite 601
West Palm Beach, FL 33401

Re: RQO 26-012

Dear Ms. Herman,

Your request for an advisory opinion to the Palm Beach County Commission on Ethics (COE) has been received and reviewed. The opinion rendered is as follows:

QUESTION:

As a Palm Beach County (County) employee, would it violate the Palm Beach County Code of Ethics (Code) if the non-profit organization of which you are a board member accepts support from a county vendor who will donate space and/or a sponsorship to the non-profit organization?

BRIEF ANSWER:

The Code would not be violated if the non-profit organization of which you are a board member accepts support from a county vendor who will donate space and/or a sponsorship to the non-profit organization, as long as you follow the requirements as described in this advisory opinion.

FACTS:

You are a county employee. You also serve on the board of a non-profit charitable organization, Florida Association for Women Lawyers (FAWL), along with a variety of individuals from other law firms and governmental entities. One of the other attorneys working with FAWL is employed at a law firm, Jones Foster (JF), who is both a county vendor as well as a firm who engages in lobbying. JF would like to offer FAWL its law firm's conference room for FAWL's meetings and events. Additionally, JF would like to provide a sponsorship to FAWL.¹

You would like to ensure that the Code is not violated if JF provides these benefits to FAWL while you are an active board member or volunteer.

ANSWER:

Public employees and officials are prohibited from using their official position to give a special financial benefit, not shared with similarly situated members of the general public, to specified

¹ While the exact amount of the sponsorship is unknown, it is likely to be more than \$1000.

persons or entities, including to an organization of which they are an officer or director.² Thus, as a county employee, you are prohibited from using your position as a county employee to give a special financial benefit to FAWL, a non-profit organization of which you are an officer or director. Furthermore, Section 2-444(a)(1) of the Code specifically prohibits you, in your individual capacity, from soliciting or accepting a gift valued at over \$100 from any vendor of the county or any lobbyist or principal or employer of a lobbyist who lobbies the county.

Based on the facts provided, you are not soliciting or accepting the donation or gift from JF in your individual capacity. Additionally, there is no indication that you used your position as a county employee to request, secure, or influence the donation. Instead, JF is providing the use of space and/or sponsorship support directly to FAWL through its relationship with a board member employed by JF and in recognition of FAWL's status as a nonprofit organization. Because the gifts are being provided to FAWL rather than to you specifically, as long as you follow the guidance provided in this opinion, the donation offered to FAWL by JF does not violate the Code.

It should be noted that, if you were to solicit donations on behalf of FAWL, the Code has an exception for solicitations or donations on behalf of non-profit charitable organizations. Section 2-444(h), Solicitation of contributions on behalf of a non-profit charitable organization, permits you to solicit and accept funds for a non-profit charitable organization from a county vendor or a lobbyist or principal or employer of a lobbyist who lobbies the county provided there is no quid pro quo or other special consideration given.

Once this exception is used, a record of any solicitations or any donations from any county vendor or a lobbyist or principal or employer of a lobbyist who lobbies the county must be maintained and submitted to the COE within 30 days of the event or if not solicited or donated for an event, then within 30 days of the solicitation or donation.³ In this case, you would need to submit a charitable solicitation log (which can be found on our website: www.palmbeachcountyethics.com/pdf/Forms/Solicitation%20Log.pdf), listing the county vendor, the event, and the amount donated to FAWL.

Further, although the Code does not prohibit you from soliciting and accepting donations on behalf of FAWL as a non-profit charitable organization, your service on FAWL's board requires that any participation in fundraising for FAWL needs to be in your personal name only without any reference to your position as an employee of the county. Lending your name and official title as a county employee to a FAWL fundraising effort would per se constitute using your official position to provide a special financial benefit to that organization.⁴ This applies directly to you and to anyone indirectly soliciting on your behalf.

² Sec. 2-443(a)(1-7), Misuse of public office or employment

³ Sec. 2-444(h)(2), Solicitation of contributions on behalf of a non-profit charitable organization.

⁴ RQO 12-081

Finally, although the Code does not prohibit your board membership or support of FAWL, the following guidance is provided as a general reminder regarding your obligations as a public employee. No quid pro quo or any other benefit may ever be given for an official act or the past, present, or future performance of a public duty.⁵ You are also reminded that public officials are prohibited from using their official position to corruptly secure or attempt to secure a special privilege, benefit, or exemption for themselves or others.⁶ Corruptly means done with a wrongful intent and for the purpose of obtaining any benefit resulting from some act which is inconsistent with the proper performance of the official's duties.⁷

LEGAL BASIS:

The legal basis for this opinion is found in Sec. 2-443(a), Sec. 2-444(a)(1), and Sec. 2-444(h) of the Code:

Sec. 2-443. Prohibited conduct.

(a) ***Misuse of public office or employment.*** An official or employee shall not use his or her official position or office, or take or fail to take any action, or influence others to take or fail to take any action, in a manner which he or she knows or should know with the exercise of reasonable care will result in a special financial benefit, not shared with similarly situated members of the general public, for any of the following persons or entities:

(7) A civic group, union, social, charitable, or religious organization, or other organization of which he or she (or his or her spouse or domestic partner) is an officer or director. However, this sub-section shall not apply to any official or employee who is required to serve on the board of directors of any organization solely based on his or her official position (ex-officio), regardless of whether he or she has voting rights on the board, and who receives no financial compensation for such service on the board of directors, and otherwise has no personal ownership interest in the organization.

Sec. 2-444. Gift law.

(a)(1) No county commissioner, member of a local governing body, mayor or chief executive when not a member of the governing body, or employee, or any other person or business entity on his or her behalf, shall knowingly solicit or accept directly or indirectly, any gift with a value of greater than one hundred dollars (\$100) in the aggregate for the calendar year from any person or business entity that the recipient knows, or should know with the exercise of reasonable care, is a vendor, lobbyist, or any principal or employer of a lobbyist, who lobbies, sells, or leases to the county or municipality as applicable.

(h) Solicitation of contributions on behalf of a non-profit charitable organization.

⁵ Sec. 2-444(e), Gift law.

⁶ Sec. 2-443(b), Corrupt misuse of official position

⁷ Id.

- (1) Notwithstanding the prohibition on gifts as outlined in subsections (a) and (b), the solicitation of funds by a county or municipal official or employee for a non-profit charitable organization, as defined under the Internal Revenue Code, is permissible so long as there is no quid pro quo or other special consideration, including any direct or indirect special financial benefit to the official or employee or to the person or entity being solicited. The solicitation by an official or employee as contemplated herein, is expressly prohibited if made to any person or entity with a pending application for approval or award of any nature before the county or municipality as applicable.
- (2) To promote the full and complete transparency of any such solicitation, officials and employees shall disclose, on a form provided by the commission on ethics, the name of the charitable organization, the event for which the funds were solicited, the name of any person or entity that was contacted regarding a solicitation or pledge by the official or employee, and the amount of the funds solicited or pledged if known. The form shall be completed legibly and shall be filed with the commission on ethics. The form shall be filed within thirty (30) days from the occurrence of the event for which the solicitation was made, or if no event, within thirty (30) days from the occurrence of the solicitation.
- (3) Officials and employees may not use county or municipal staff or other county or municipal resources in the solicitation of charitable contributions described in this subsection.

This opinion construes the Palm Beach County Code of Ethics Ordinance and is based upon the facts and circumstances that you have submitted. The Palm Beach County Commission on Ethics does not investigate the facts and circumstances submitted but assumes they are true for purposes of this advisory opinion. It is not applicable to any conflict under state law. Inquiries regarding possible conflicts under state law should be directed to the State of Florida Commission on Ethics.

Please feel free to contact me at 561-355-1915 if you need further assistance in this matter.

Sincerely,



Christie Kelley,
Executive Director

RG/gl