



Honesty - Integrity - Character

**Palm Beach County
Commission on Ethics**

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News Release

For immediate release:
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October 1, 2026
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Summary of Palm Beach County Commission on Ethics Meeting Held on October 1, 2026

The Palm Beach County Commission on Ethics (COE) took the following action at its monthly public meeting held on October 1, 2026.

The COE approved two advisory opinions. The full opinions will be available on the COE's website within seven days at: <https://www.palmbeachcountyethics.com/coepub/>.

RQO 26-018: An employee of Palm Beach County (County) asked if the Palm Beach County Code of Ethics (Code) would prohibit his ownership of an outside business that would provide trauma and mental health services to first responders, where the business may treat County employees, establish a referral relationship with a Palm Beach County vendor, and receive payment from the County-funded employee health plan.

COE ANSWER: Based on the facts presented, the Code does not prohibit the ownership of the business as long as the employee does not use, or attempt to use, his public position in any way to give a special financial benefit to himself, his outside business, or its customers or clients. This includes using his County position to refer, recommend, or otherwise direct County employees to the outside business, soliciting business during County work time, or using his County title, position, authority, or influence in connection with its business activities. There is an additional prohibition against using his County title or any reference to his County employment in any marketing, awareness, or partnership efforts.

Additionally, neither the employee nor his outside business may enter into any direct or indirect contract or transaction for goods or services with the County unless an exception applies.

The COE also analyzed whether a conflict could arise if the outside business submitted claims to and received payment from the same insurance provider used by the County. Based on the facts presented, the County is not the ultimate purchaser or recipient of the outside business' services, and the fact that the business may receive payment through

other County employees' health plans does no, by itself, create an indirect contractual relationship under the Code. While the likelihood of a conflict of interest increases as a public employee's outside business becomes more directly connected to a transaction involving the public employer, the connection here between the outside business and the insurance payment is sufficiently attenuated. Accordingly, the Code does not prohibit the arrangement described in this opinion.

RQO 26-019: A County employee asked if the anti-nepotism provision of the Code would prohibit her from working or acting in a supervisory capacity within the same section as an employee who will soon become her son-in-law when that employee falls within her overall organizational responsibilities?

COE ANSWER: Provided certain conditions are met, the Code does not prohibit this situation. The Code's anti-nepotism provision generally does not preclude the continued employment or advancement of individuals who are currently employed with the same governmental agency when a familial relationship later occurs. It also does not require the discharge of a person who becomes a relative after employment is established. Therefore, the Code does not prohibit the supervisory employee from continuing to work in a supervisory capacity within the same section as the subordinate employee when he becomes her son-in-law as long as the guidance in this opinion is carefully followed, including exercising no control over her future son-in-law's employment or potential promotion and abstaining from advocating for any promotion for him in the future.

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

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