



PALM BEACH COUNTY COMMISSION ON ETHICS

2633 Vista Parkway, West Palm Beach, Florida 33411

Hotline: 877-766-5920 or 561-233-0724

COMPLAINT FORM

1. Complainant (Person bringing Complaint) Add pages, if necessary.

Name: Michael H. Nelson

Address: 13650 Columbine Ave

City: Wellington FL

Zip: 33414

Home #: 561-793-4094

Work #: 561-596-9535

Cell #: 561-596-9535

2. Respondent (Person against whom complaint is made) Add pages, if necessary.

Name: John J. Greene

Address: 11226 Maritime Ct

City: Wellington FL

Zip: 33467

Home #: Unknown

Work #: 561-791-4000

Cell #: Unknown

Title/Office Held or Sought: Village of Wellington Council Member

3. IF KNOWN, CHECK THE BOX OR BOXES THAT APPLY

☒ Allegation is against person in
County/Municipal Government

☐ Allegation is about County:
Whistleblower Retaliation

4. STATEMENT OF FACTS BASED ON YOUR PERSONAL KNOWLEDGE

In a separate attachment, please describe in detail the facts and actions that are the basis of your complaint, including the dates when the actions occurred. Also attach any relevant documents as well as names and contact information of persons who may be witnesses to the actions. If known, indicate the section of the ordinance you believe is being violated. For further instructions, see page 2 of this form.

5. OATH

I, the person bringing this complaint, do depose on oath or affirmation and say that the facts set forth in the foregoing complaint and attachments are true and correct, to the best of my knowledge and belief.

Signature of Person Making Complaint

STATE OF FLORIDA

COUNTY OF Palm Beach

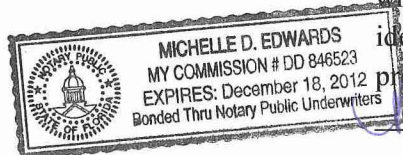
Sworn to (or affirmed) and subscribed before me
this 24th day of July, 2012, by

Michael H. Nelson

(Name of Person Making Statement)

who is personally known to me ☒ or produced
identification ☐. Type of identification

produced: Michelle D. Edwards



(Signature of Notary Public, State of Florida)

(Print, Type, or Stamp Commissioned Name of Notary Public)

MEMORANDUM OF INQUIRY

To: Alan S. Johnson, Executive Director
From: Mark E. Bannon, Investigator
Re: C12-006 – John J. Greene, Village of Wellington Council Member

- **Background**

This matter came to the attention of the Commission on Ethics (COE) staff through a sworn complaint submitted by Michael H. Nelson, who lists his address as, 13650 Columbine Ave., Wellington, FL 33414. The Complaint was dated July 24, 2012, and was properly notarized. Attached to the Complaint was a two (2) page typed document entitled, "Addendum to Complaint Form as submitted on 7-25-12" (The Addendum). This document details the information that forms the basis of the complaint. Also provided with the Complaint Form was the following; a copy of a form used by a gated residential community, Palm Beach Polo and Country Club (PB Polo), to register resident's vehicles and obtain an access decal for entry into the development, a copy of what appears to be a two (2) page electronic security log for the entry gate, and an email dated July 2, 2012 from Daniel Polhamus, Director of Access Control for PB Polo, to Paul Rubino of the Palm Beach County Sheriff's Office (PBSO), requesting information about a vehicle registration number. The Addendum to the Complaint details two (2) specific allegations of violations of the Palm Beach County Code of Ethics (the Code).

The first allegation addresses Respondent's acceptance of an access decal for PB Polo, and states that Respondent was, "complicit in deceiving Palm Beach Polo and Country Club (Polo) as to his having access to Polo via an access decal that was issued to Mr. Neil Hirsch for a vehicle Mr. Hirsch claimed was Mr. Hirsch's vehicle on an application form completed on May 29, 2012." The Addendum goes on to state that the vehicle involved is a 2009 Volvo listed on the application as having a Florida vehicle registration tag number of "JAC 005," when the actual registration plate for this vehicle, owned by Respondent, is "J85 34U." Complainant states within the Addendum that Respondent is a newly elected Wellington Councilman and was, "heavily financially supported by Mr. Hirsch in concert with others." Complainant alleges that while Respondent visited Hirsch only four (4) times from January 2012, until he was seated on the Village Council, these visits increased significantly after his election, and that on May 11, 2012, Respondent visited Hirsch at the same time as Village Councilmember Matthew Willhite. Further, after affixing the access decal to his vehicle on May 29, 2012, Complainant alleges that Respondent visited Hirsch a total of sixteen (16) times between June 10, and July 1, 2012. Finally, Complainant alleges that Respondent and Hirsch, "worked to deceive Polo and the public as to Councilman Greene meeting Mr. Hirsch. In addition, the access by decal has significant value not available to the general public and Councilman Greene's acceptance of the decal is a violation of the Gift Law." The second allegation in the Complaint concerns the aforementioned access decal as being of significant value, and thus is a gift to Respondent. Complainant alleges that the acceptance of this entry decal to PB Polo by Respondent is a violation of the Gift law because "fraud" was used to obtain the decal by both Respondent and Neil Hirsch.

- **Inquiry**

I reviewed the information provided by Complainant in the Addendum and other documents. During this initial review, I observed that Complainant had not listed a nexus between the alleged "fraudulent" obtaining of the PB Polo access decal for his vehicle, and the use of Respondent's authority as a Village Council member in obtaining this decal, other than to state that Neil Hirsch and others had financially supported Respondent's election to the Council.

During a discussion of the Complaint with COE Executive Director Alan Johnson, I was advised of the fact that on May 21, 2012, Respondent sent a request for an advisory opinion to the Commission on Ethics (COE) requesting to know if he was allowed to accept temporary housing from a long-time friend (RQO 12-045)¹. The proposed donor of the temporary housing was not named in the opinion, but was determined from discussions with Respondent to be Neil Hirsch. In this advisory opinion, Respondent was given guidance as to the parameters of accepting such a "gift" of temporary housing, including that since the gift amount exceeded \$100 in value, the donor could not be a vendor, lobbyist, or the employer or principal of a lobbyist that lobbied the Village. Respondent was further

¹ RQO 12-045, rendered by COE on June 8, 2012.

advised that he could not use his official position as a Village Councilman to corruptly secure any benefit for any person, or to obtain a financial benefit for himself not available to similarly situated members of the general public. The opinion also stated that he must follow the state law gift reporting requirements as an elected official. I believed, based on the Complaint, that Complainant was unaware of this advisory opinion and Respondent taking up temporary residence in Hirsch's home, so I placed a copy of the opinion in the inquiry file.

I made contact with Complainant and arranged to meet with him at his office in Wellington on Monday, August 6, 2012 to discuss the Complaint.

- **Interview with Michael H. Nelson, Complainant**

On Monday, August 6, 2012 at 11:00 AM, I met with Complainant Michael H. Nelson at his office in Wellington. Also present during this interview was attorney Alexander L. Domb, introduced by Complainant as his attorney. This interview was not recorded, nor was it taken under oath, as its primary purpose was to clarify information already sworn to in the Complaint. Complainant gave me a business card listing himself as President/CEO of Effective Solutions, Inc., with an address of 11199 Polo Club Road, Suite 3, Wellington, Florida. He also indicated that he was a consultant for the Polo Club properties in both land use and real estate matters.

After an initial discussion about his complaint, I presented Complainant with a copy of RQO 12-045. Attorney Domb reviewed the opinion while Complainant and I discussed the Complaint. My initial discussion with Complainant concerned the issue of any nexus between Respondent's alleged actions in obtaining an access decal and the use of his position as a council member in doing so. During a prolonged discussion of this issue, Complainant insisted that this nexus was found in the overall situation of how the access decal was obtained. He pointed to the following information provided in the Complaint Addendum: The access decal was obtained using a "fraudulent" vehicle registration number, Respondent's bid for elected office was partially financed by Neil Hirsch, and that Respondent's visits to Hirsch's home had increased in number, and on at least one occasion involved another council member. Complainant also stated that there were land use issues scheduled to come before the Village Council that involved Hirsch's property interests as further evidence of this nexus. Complainant also provided me with a copy of a map of PB Polo with some hand written labels to illustrate this point. This map was submitted to the file. There were no allegations by Complainant that the Respondent had participated or voted on any matter involving the Hirsch property subsequent to his accepting the decal or temporary residence on the Hirsch property, only that issues were scheduled to come before the Council.

Although there is no face value to the decal, which is available for free to all residents and their guests, Complainant stated that by his estimation simple access to the PB Polo property was valued at \$500, based on the ability to come and go freely, and to enjoy the various amenities that access allows, such as watching polo practice. When asked if the access decal provided entry into the country club or use of those facilities, he stated that it did not, because there was a separate fee for joining. However, he also stated during this discussion that as a resident of PB Polo, Hirsch was entitled to obtain an access decal at no additional cost to him or to any person who was temporarily staying at his home, but should not have done so in the manner he did. I pointed out to Complainant that regardless of the method used by the resident Hirsch, the decal was able to be obtained based on Respondent's temporary residence at Hirsch's home. Additionally, in the matter of obtaining the decal, the Complainant provided no evidence, other than conjecture, that Respondent used his official position as a Village Councilman to give a financial or other benefit to Hirsch in exchange for the decal. Further, I pointed out that the application was signed not by Respondent, but by Neil Hirsch.

We then discussed gift law issues. I advised Complainant that Respondent had followed the advice of the COE by ensuring that Hirsch, who had been on the board of directors of an entity that employed a lobbyist, had resigned from this board prior to Respondent accepting this gift of temporary residence so as not to violate the Gift Law. The advisory opinion also explained Respondent's reporting obligation under state law.

The interview was concluded shortly thereafter, and I departed Complainant's office.

I next decided to speak with Respondent to address some of the concerns brought up in my discussion with Complainant. I spoke with Village Attorney Jeff Kurtz who advised me that Respondent was unavailable, but would be available on Tuesday, August 14, 2012 to speak with me. We set up a telephone interview for that time.

- **Interview with John J. Greene, Village of Wellington Council Member**

On Tuesday, August 14, 2012 at approximately 3:00 PM, I was able to speak to Respondent by telephone. Village Attorney Jeff Kurtz, was also present during this conversation. This interview was not recorded or taken under oath.

At the initiation of the interview Respondent advised me that both he and attorney Kurtz were aware of the Complaint filed by Michael Nelson, as they had been given copies of the Complaint, and all documents filed with the Complaint by Nelson.

In discussing the issue of the access decal for PB Polo, Respondent advised me that since he was going to be temporarily living at Hirsch's property in PB Polo, he and Hirsch went to the security office to obtain an entry permit for his car. The application was filled out by Hirsch because he was the resident, and therefore had to authorize the access decal for any guest. Respondent stated that while filling out this application, Hirsch asked him if he knew his tag number, and he gave an old tag number. However, he pointed out that he did this inadvertently. I found this explanation to be reasonable, since there was no benefit to him to give an expired or incorrect tag number. Respondent pointed out that the PB Polo security personnel were the ones who installed the decal on his bumper, and had they checked, the inadvertent error in tag numbers could have been found and corrected immediately.

I then asked him if the gift of temporary housing from Hirsch was based on any past, present or future *quid pro quo* to Hirsch by Respondent in his position as a councilman, or any other improper reason. Greene stated unequivocally that it was based on their thirty-year friendship, and the fact that Hirsch was willing and able to provide such help, and for no other reason. We briefly discussed his responsibilities in reporting the gift of housing under state law, and shortly thereafter the interview was ended. Greene also advised that he moved into the guest house of Neil Hirsch on a temporary basis on June 9, 2012, the day after Hirsch resigned from the board of the Wellington Equestrian Preserve Alliance (WEPA), because the advisory opinion stated that he could not accept a gift valued at over \$100 from any lobbyist, or from any employer or principal of a lobbyist that lobbies Wellington. The WEPA is the principal of a lobbyist who lobbies Wellington. Respondent was able to provide by email a copy of an email/letter written by Neil Hirsch to Mat Forrest, Executive Director of the Wellington Equestrian Preserve Alliance, in which Neil Hirsch resigned from the Board of Directors effective immediately, and in which Forrest acknowledges this resignation. The resignation email was dated June 8, 2012.

- **Witnesses interviewed during this Inquiry**

1. Michael H. Nelson, Complainant
2. John J. Greene, Respondent

- **Documents submitted to file**

1. Copy of the initial Complaint Form. (1 page)
2. Copy of document entitled, "Addendum to Complaint Form as submitted on 7-25-12." (2 pages)
3. Copy of Application for parking access decal from PB Polo. (1 page)
4. Copy of electronic access logs for PB Polo. (2 pages)
5. Copy of email from Daniel Polhamus, Director of Access Control for PB Polo, to Paul Rubino, PBSO. (1 page)
6. Copy of RQO 12-045, Advisory opinion requested by Respondent on May 21, 2012. (3 pages)
7. Copy of map of PB Polo with handwritten labels submitted by Complaint. (1 page)
8. Copy of email "Letter of Resignation" dated June 8, 2012, from Neil Hirsch to Mat Forrest, Executive Director of the Wellington Equestrian Preserve Alliance. (1 page)

- **Legal Analysis**

The following portions of the PBC Commission on Ethics ordinance are relevant to this Inquiry:

Section 2-254. Creation and jurisdiction.

The Palm Beach County Commission on Ethics (hereinafter "commission on ethics") is hereby established. The jurisdiction of the commission on ethics shall extend to *any person required to comply with the*

countywide code of ethics, the county lobbyist registration ordinance, and the county post-employment ordinance... (Emphasis added)

Section 2-442. Definitions.

Official or employee means any official or employee of the county or the municipalities located within the county, whether paid or unpaid. (Emphasis added)

As a member of the Village of Wellington Council, John J. Greene is subject to the provisions of the PBC Code of Ethics, as of June 1, 2011, when Wellington came under the jurisdiction of the PBC Commission on Ethics.

The following section of the Palm Beach County Code of Ethics is relevant to this inquiry.

Section 2-443(a), *Misuse of public office or employment*, states in relevant portion:

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:

- (1) Himself or herself;
- (2) His or her spouse or domestic partner, household member or persons claimed as dependents on the official or employee's latest individual federal income tax return, or the employer or business of any of these people;
- (3) A sibling or step-sibling, child or step-child, parent or step-parent, niece or nephew, uncle or aunt, or grandparent or grandchild of either himself or herself, or of his or her spouse or domestic partner, or the employer or business of any of these people;
- (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;
- (5) A customer or client of the official or employee's outside employer or business;
- (6) A substantial debtor or creditor of his or hers, or of his or her spouse or domestic partner-- "substantial" for these purposes shall mean at least ten thousand dollars (\$10,000) and shall not include forms of indebtedness, such as a mortgage and note, or a loan between the official or employee and a financial institution;
- (7) A civic group, union, social, charitable, or religious organization, or other not for profit organization of which he or she (or his or her spouse or domestic partner) is an officer or director.

There was no evidence found during this inquiry that the gift of temporary housing given to Village of Wellington Council Member John J. Greene by Neil Hirsch was in violation of Section 2-443(a) of the Code of Ethics, as there is no indication that Greene used his official position as a council member to obtain this benefit, including the use of a vehicle access decal as listed in the complaint.

Section 2-443(b) *Corrupt misuse of official position*, states:

An official or employee shall not use his or her official position or office, or any property or resource which may be within his or her trust, to corruptly secure or attempt to secure a special privilege, benefit, or exemption for himself, herself, or others. For the purposes of this subsection, "*corruptly*" means *done with a wrongful intent and for the purpose of obtaining, or compensating or receiving compensation for, any benefit resulting from some act or omission of an official or employee which is inconsistent with the proper performance of his or her public duties.* (Emphasis added)

There was no evidence found during this inquiry that the gift of temporary housing given to Village of Wellington Council Member John J. Greene by Neil Hirsch was in violation of Section 2-443(b) of the Code of Ethics, as there is no indication that Greene used his official position as a council member to obtain this benefit in a corrupt manner, including the use of a vehicle access decal as listed in the complaint.

Section 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. (Emphasis added)

- (e) No person or entity shall offer, give, or agree to give an official or employee a gift, and no official or employee shall accept or agree to accept a gift from a person or entity, because of:
- (1) An official public action taken or to be taken, or which could be taken;
 - (2) A legal duty performed or to be performed or which could be performed; or
 - (3) A legal duty violated or to be violated, or which could be violated by any official or employee.
- (f) Gift reports. Any official or employee who receives a gift *in excess of one hundred dollars (\$100) shall report that gift* in accordance with this section. (Emphasis added)
- (1) *Gift reports for officials and employees identified by state law as reporting individuals.* Those persons required to report gifts pursuant to state law *shall report those gifts in the manner provided by Florida Statutes, §112.3148, as may be amended.* A copy of each report shall be filed with the county commission on ethics. (Emphasis added)

Based on the information obtained during this inquiry, the gift of temporary housing given to Respondent is valued at more than \$100.² As an elected official, Respondent is required to report gifts under state rules. A copy of this report must also be forwarded to the PBC Commission on Ethics under the local code of ethics.

Section 2-444(a)(1) of the Gift Law prohibits Respondent as a Village of Wellington Council Member from accepting any gift valued at more than \$100 yearly in the aggregate, from any person or entity that is a vendor, lobbyist, or the employer or principal of a lobbyist who lobbies Wellington. Since Neil Hirsch resigned from the board of WEPA (which is a principal of a lobbyist who lobbies Wellington) prior to Greene accepting the gift of temporary housing from him, this gift is not prohibited under the Code, unless done for some corrupt purpose under Section 2-443(b), or in exchange for the performance of an official act or legal duty as described under Section 2-444(e) of the Gift Law. There is no evidence to support any such allegation.

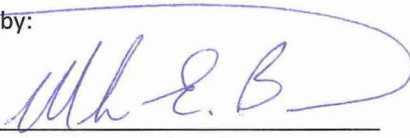
It should be noted that the Complainant was unaware at the time this Complaint was filed that the Respondent had asked for an advisory opinion, as to applicability or interpretation of the Code in regard to Respondent's acceptance of temporary residence on the Hirsch property. While in his interview, Complainant vigorously advocated that the facts and circumstances still present a violation of the Code based on the improper information listed on the application for decal, there has been no information offered, within the personal knowledge of the Complainant, that the Respondent used his official position in violation of the Code.

• **Conclusion**

Based on the fact that the information provided in the Complaint, even if true, did not allege a violation of any provision of the PBC Code of Ethics, and the COE Inquiry did not find any evidence of such a violation, there is no legal sufficiency to open a formal investigation into this matter.

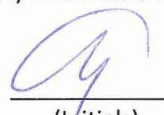
It is the recommendation of staff that this Complaint be **DISMISSED** based upon a finding of **NO LEGAL SUFFICIENCY**.

Submitted by:


Mark E. Bannon, Investigator
PB County Commission on Ethics

8/16/2012
Date

Reviewed by:


(Initials)

08/16/2012
Date

² Art. XIII, §2-444(g) (When determining the value of a gift, the recipient may consult among other sources, section 112.3148, Florida Statutes and the Florida Administrative Code. Section 112.3148(7)(e) values lodging on consecutive days as a single gift, with lodging in a private residence calculated at the per diem rate of \$44 per night)

PALM BEACH COUNTY COMMISSION ON ETHICS

MEMORANDUM OF NO LEGAL SUFFICIENCY

To: Palm Beach County Commission on Ethics
From: Alan S. Johnson, Executive Director
Re: C12-006 – John J. Greene, Village of Wellington Council Member

- **Recommendation**

Regarding the Complaint against Respondent, John J. Greene, Village of Wellington Council Member, COE staff recommends a finding of **NO LEGAL SUFFICIENCY** be entered in complaint number C12-006.

Legal sufficiency exists where there is an allegation containing the elements of a violation of an ordinance within the jurisdiction of the Ethics Commission, purportedly committed by an individual within the authority of the Ethics Commission, based substantially on the personal knowledge of the Complainant, relating to an alleged violation occurring after the effective date of the code, and filed with the Ethics Commission within two years of the alleged violation.

- **Background**

This matter came to the attention of the Commission on Ethics (COE) staff through a sworn complaint submitted by Michael H. Nelson, who lists his address as, 13650 Columbine Ave., Wellington, FL 33414. The Complaint was dated July 24, 2012, and was properly notarized. Attached to the Complaint was a two (2) page typed document entitled, "Addendum to Complaint Form as submitted on 7-25-12" (The Addendum). This document details the information that forms the basis of the complaint. The Addendum to the Complaint details two (2) specific allegations of violations of the Palm Beach County Code of Ethics (the Code).

The first allegation addresses Respondent's acceptance of an access decal for PB Polo, and states that Respondent was, "complicit in deceiving Palm Beach Polo and Country Club (Polo) as to his having access to Polo via an access decal that was issued to Mr. Neil Hirsch for a vehicle Mr. Hirsch claimed was Mr. Hirsch's vehicle on an application form completed on May 29, 2012." The Addendum goes on to state that the vehicle involved is a 2009 Volvo listed on the application as having a Florida vehicle registration tag number of "JAC 005," when the actual registration plate for this vehicle, owned by Respondent, is "J85 34U." Complainant states within the Addendum that Respondent is a newly elected Wellington Councilman and was, "heavily financially supported by Mr. Hirsch in concert with others." Complainant alleges that while Respondent visited Hirsch only four (4) times from January 2012, until he was seated on the Village Council, these visits increased significantly after his election, and that on May 11, 2012, Respondent visited Hirsch at the same time as Village Councilmember Matthew Willhite. Further, after affixing the access decal to his vehicle on May 29, 2012, Complainant alleges that Respondent visited Hirsch a total of sixteen (16) times between June 10, and July 1, 2012. Finally, Complainant alleges that Respondent and Hirsch, "worked to deceive Polo and the public as to Respondent meeting Mr. Hirsch. In addition, the access by decal has significant value not available to the general public and Respondent's acceptance of the decal is a violation of the Gift Law."

The second allegation in the Complaint concerns the aforementioned access decal as being of significant value, and thus is a gift to Respondent. Complainant alleges that the acceptance of this entry decal to PB Polo by Respondent is a violation of the Gift law because "fraud" was used to obtain the decal by both Respondent and Neil Hirsch.

Respondent had previously requested an advisory opinion regarding temporary (90 day) residence at the home of Mr. Hirsch and asked whether the Code restricted or prohibited such residence.¹ Respondent began his temporary residence at the Hirsch property in Polo on June 10, 2012. It should be noted that the Complainant was unaware at the time this Complaint was filed that the Respondent had asked for and received an advisory opinion as to applicability or interpretation of the Code in regard to Respondent's acceptance of temporary residence on the Hirsch property.

¹ RQO 12-045

- **Analysis**

As a Village of Wellington Councilman, Respondent is subject to the provisions of the Palm Beach County Code of Ethics (the Code), as of June 1, 2011, when the Village came under the jurisdiction of the COE.

The following section of the Palm Beach County Code of Ethics is relevant to this inquiry.

Section 2-443(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:

- (1) Himself or herself;

There was no evidence found during this inquiry that the gift of temporary housing given to Respondent was in violation of Section 2-443(a) of the Code of Ethics, as there is no indication that Respondent used his official position as a council member to obtain this benefit, including the use of a vehicle access decal as listed in the complaint.

Section 2-443(b) *Corrupt misuse of official position*

An official or employee shall not use his or her official position or office, or any property or resource which may be within his or her trust, to corruptly secure or attempt to secure a special privilege, benefit, or exemption for himself, herself, or others. For the purposes of this subsection, "*corruptly*" means *done with a wrongful intent and for the purpose of obtaining, or compensating or receiving compensation for, any benefit resulting from some act or omission of an official or employee which is inconsistent with the proper performance of his or her public duties.* (Emphasis added)

There was no evidence found during this inquiry that the gift of temporary housing given to Respondent was in violation of Section 2-443(b) of the Code of Ethics, as there is no indication that Respondent used his official position as a council member to obtain this benefit in a corrupt manner, including the use of a vehicle access decal as listed in the Complaint.

Section 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.* (Emphasis added)

(e) No person or entity shall offer, give, or agree to give an official or employee a gift, and no official or employee shall accept or agree to accept a gift from a person or entity, because of:

- (1) An official public action taken or to be taken, or which could be taken;
- (2) A legal duty performed or to be performed or which could be performed; or
- (3) A legal duty violated or to be violated, or which could be violated by any official or employee.

(f) Gift reports. Any official or employee who receives a gift *in excess of one hundred dollars (\$100) shall report that gift* in accordance with this section. (Emphasis added)

- (1) *Gift reports for officials and employees identified by state law as reporting individuals.* Those persons required to report gifts pursuant to state law *shall report those gifts in the manner provided by Florida Statutes, §112.3148*, as may be amended. A copy of each report shall be filed with the county commission on ethics. (Emphasis added)

Based on the information obtained during this inquiry, the gift of temporary housing given to Respondent is valued at more than \$100.² As an elected official, Respondent is required to report gifts as required under state law. A copy of this report must also be forwarded to the COE under the Palm Beach County Code of Ethics.

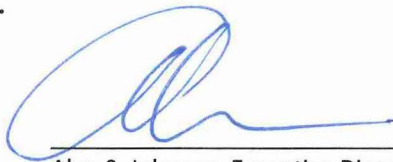
Section 2-444(a)(1) of the Gift Law prohibits Respondent, as a Village of Wellington Council Member, from accepting any gift valued at more than \$100 annually in the aggregate, from any person or entity that is a vendor, lobbyist, or the employer or principal of a lobbyist who lobbies Wellington. Prior to June 9, 2012, Neil Hirsch was a director of a non-profit organization, Wellington Equestrian Preserve Alliance (WEPA). This organization employed a lobbyist who had lobbied the Village. However, since Mr. Hirsch resigned from the board of WEPA prior to Respondent accepting the gift of temporary housing from him, this gift is not prohibited under the Code, unless done for some corrupt purpose under Section 2-443(b), or in exchange for the performance of an official act or legal duty as described under Section 2-444(e) of the Gift Law. There is no evidence to support any such allegation.

- **Conclusion**

Based on the fact that the information provided in the Complaint, even if true, does not allege a violation of any provision of the Palm Beach County Code of Ethics, and the COE Inquiry did not find any evidence of such a violation, there is **NO LEGAL SUFFICIENCY** to open a formal investigation into this matter.

It is the recommendation of staff that this **COMPLAINT** be **DISMISSED** based upon a finding of **NO LEGAL SUFFICIENCY**.

BY:



Alan S. Johnson, Executive Director
Florida bar #223352
Commission on Ethics

08/17/2012
Date

² Art. XIII, §2-444(g) (When determining the value of a gift, the recipient may consult among other sources, section 112.3148, Florida Statutes and the Florida Administrative Code. Section 112.3148(7)(e) values lodging on consecutive days as a single gift, with lodging in a private residence calculated at the per diem rate of \$44 per night)

Addendum to Complaint Form as submitted on 7-25-12

Respondent:

John Greene, Councilmember, Wellington FL

It is my belief that Councilman Greene has violated Article XIII, Code of Ethics, Sec. 2-443 entitled Prohibited Conduct and possibly Sec. 2.444 entitled Gift Law.

The specific action is Councilman Greene being complicit in deceiving Palm Beach Polo and Country Club (Polo) as to his having access to Polo via an access decal that was issued to Mr. Neil Hirsch for a vehicle Mr. Hirsch claimed was Mr. Hirsch's vehicle on an application form completed on May 29, 2012. The vehicle is a 2009 C70 Volvo black convertible as stated on the application. The application stated that the Florida vehicle tag number was JAC 005 which according to PBSO is an invalid tag number. The actual Florida tag number on the vehicle is J85 34U and is registered to Councilman Greene.

As noted Mr. Greene is a Village of Wellington Council Member having been recently elected and heavily financially supported by Mr. Hirsch in concert with others. Prior to the election Mr. Greene gained access to Polo to visit Mr. Hirsch via the guest gate as documented by an Entries Reports obtained from Polo. Visits to Mr. Hirsch were 4 from January 1, 2012 until the date Mr. Greene was seated as a Council Member on approx. April 1, 2012. Visits to Mr. Hirsch increased significantly once he was elected including one visit that included Council Member Matthew Wilhite on May 11, 2012 at approx. 11:00 AM. A separate complaint under the Sunshine Law is in process regarding this meeting.

As stated Councilman Greene had an access decal affixed to his vehicle via the false application on May 29, 2012. From the date he fraudulently obtained the access decal he visited Mr. Hirsch a total of 16 times from June 10, 2012 to July 1, 2012. On June 30, 2012 Mr. Greene was observed speeding through Polo which brought to the attention of Polo that the vehicle supposedly owned and operated by Mr. Hirsch actually belonged to someone else. On July 2, 2012 the access rights to this vehicle were ceased by deactivating the decal.

Mr. Hirsch, nor Councilman Greene, have made any effort to correct the information supplied to Polo and Councilman Greene now gains access to Polo via the guest gate and has visited Mr. Hirsch a total of 12 times from July 14, 2012 to July 22, 2012.

It is my firm belief that Councilman Greene and Mr. Hirsch worked to deceive Polo and the public as to Councilman Greene meeting Mr. Hirsch. In addition, the access by decal has significant value not available to the general public and Councilman Greene's acceptance of the decal is a violation of the Gift Law.

As requested I have attached documentation regarding the above. Attached you will find the following:

- Decal application as completed by Neil Hirsch for the vehicle found to be owned and driven by Councilman Greene.
- Access report for the vehicle driven by Councilman Greene.
- 6-30-12 access report showing Councilman Greene entering Polo and subsequently found speeding.
- E-mail trying to determine who owns the vehicle listed on the application

What is not attached is the Entries Report pages as they contain information pertaining to other guests who are not the subject of this complaint. I will bring the reports with me when I am requested to do so.

Respectfully submitted,


Michael H. Nelson

July 25, 2012



PALM BEACH POLO GOLF & COUNTRY CLUB
11198 POLO CLUB ROAD
WELLINGTON, FL 33414
561-798-7000 EXT.7232
561-790-7114 FAX

Date: 5/29/12

Name: NEIL HIRSCH Phone: 561 793-4192

Member #: _____

Address: 12076 POLO CLUB ROAD

City: WELLINGTON State: FL Zip: 33414

Vehicle Make: VOLVO Model: C70

Color: BLACK

Year: 2008

License Tag #: JAC005 State: FL

Decal #: 54354

Cost for Decal: \$

Explanation for charge/no charge _____

Signature: _____

Homeowner Signature: Neps. f

Continental Entries Report

Start Date: 5/1/2012

Reader Name:

End Date: 7/3/2012

Resolve to CMS ☐Search Continental Archive? ☐

Generate Report

Code Number: 54354

Total Rows: 100

Entry Time	Code	Event	Device	Last Name	First Name
7/1/2012 8:47:34 PM	54354	BADGE VALID	1-1 Front Gate Rear	HIRSCH, NEIL	N/A
7/1/2012 1:48:06 PM	54354	BADGE VALID	1-1 Front Gate Rear	HIRSCH, NEIL	N/A
6/30/2012 8:09:35 PM	54354	BADGE VALID	1-1 Front Gate Rear	HIRSCH, NEIL	N/A
6/30/2012 12:58:05 PM	54354	BADGE VALID	1-1 Front Gate Rear	HIRSCH, NEIL	N/A
6/30/2012 12:01:44 AM	54354	BADGE VALID	1-1 Front Gate Rear	HIRSCH, NEIL	N/A
6/29/2012 2:09:51 PM	54354	BADGE VALID	1-1 Front Gate Rear	HIRSCH, NEIL	N/A
6/28/2012 5:44:43 PM	54354	BADGE VALID	1-1 Front Gate Rear	HIRSCH, NEIL	N/A
6/27/2012 9:24:52 PM	54354	BADGE VALID	1-1 Front Gate Rear	HIRSCH, NEIL	N/A
6/27/2012 12:58:57 AM	54354	BADGE VALID	2-1 Back Gate Rear	HIRSCH, NEIL	N/A
6/26/2012 2:05:35 PM	54354	BADGE VALID	1-1 Front Gate Rear	HIRSCH, NEIL	N/A
6/25/2012 9:31:43 PM	54354	BADGE VALID	1-1 Front Gate Rear	HIRSCH, NEIL	N/A
6/25/2012 6:11:54 PM	54354	BADGE VALID	1-1 Front Gate Rear	HIRSCH, NEIL	N/A
6/25/2012 8:15:21 AM	54354	BADGE VALID	1-1 Front Gate Rear	HIRSCH, NEIL	N/A
6/20/2012 11:06:31 PM	54354	BADGE VALID	1-1 Front Gate Rear	HIRSCH, NEIL	N/A
6/17/2012 11:13:18 AM	54354	BADGE VALID	1-1 Front Gate Rear	HIRSCH, NEIL	N/A
6/10/2012 4:00:13 PM	54354	BADGE VALID	1-1 Front Gate Rear	HIRSCH, NEIL	N/A

PERSON TO
NEIL HIRSCH

VEHICLE DRIVEN BY JOHN GREENE

ENTRIES From 5/1 - 7/1/12

SUN
SUN
SAT
SAT
FRI
THUR
WED
WED
TUES
MON
MON
MON
WED
SAT
SUN

File Edit Insert Records Window

CMS - Main Menu

Searches

Search Devices

All

Last Name

Device Use Report

Entry Time

Continental Entries

Continental Entries Report

Start Date: 6/30/2012 Reader Name: Front Gate Reader A

End Date: 7/2/2012 Resolve to CMS Search Continental Archive? Generate Report

Code Number: Total Rows: 500

Entry Time	Code	Event	Device	Last Name	First Name
6/30/2012 1:04:51 PM	52397	BADGE VALID	1-1 Front Gate Reader	Badge: 52397	N/A
6/30/2012 1:01:27 PM	54255	BADGE VALID	1-1 Front Gate Reader	ferguson, david	N/A
6/30/2012 12:58:43 PM	53920	BADGE VALID	1-1 Front Gate Reader	MOTLEY, SHEILA	N/A
6/30/2012 12:58:11 PM	50665	BADGE VALID	1-1 Front Gate Reader	NELSON, MIKE	N/A
6/30/2012 12:58:11 PM	54354	BADGE VALID	1-1 Front Gate Reader	THORNTON, NEIL	N/A
6/30/2012 12:57:29 PM	51842	BADGE VALID	1-1 Front Gate Reader	Badge: 51842	N/A
6/30/2012 12:54:17 PM	51554	BADGE VALID	1-1 Front Gate Reader	Badge: 51554	N/A
6/30/2012 12:52:35 PM	52717	BADGE VALID	1-1 Front Gate Reader	OROZCO, MARIA	N/A
6/30/2012 12:51:39 PM	53321	BADGE VALID	1-1 Front Gate Reader	MARSHAL, EDWARD	N/A
6/30/2012 12:51:33 PM	50508	BADGE VALID	1-1 Front Gate Reader	RODGERS, JOHN	N/A
6/30/2012 12:51:26 PM	53790	BADGE VALID	1-1 Front Gate Reader	JACOBSON, DONALD	N/A
6/30/2012 12:50:12 PM	54379	BADGE VALID	1-1 Front Gate Reader	remington, ned	N/A
6/30/2012 12:48:00 PM	54096	BADGE VALID	1-1 Front Gate Reader	DELUCA, MARK	N/A
6/30/2012 12:45:54 PM	53184	BADGE VALID	1-1 Front Gate Reader	DELUCA, MARK	N/A
6/30/2012 12:43:58 PM	54114	BADGE VALID	1-1 Front Gate Reader	BRAY, CATHERINE	N/A
6/30/2012 12:40:24 PM	53427	BADGE VALID	1-1 Front Gate Reader	GRIFFITHS, SCOTT	N/A
6/30/2012 12:39:58 PM	52954	BADGE VALID	1-1 Front Gate Reader	TAYLOR, MELISSA	N/A
6/30/2012 12:38:22 PM	50650	BADGE VALID	1-1 Front Gate Reader	FERENZ, ANNE	N/A
6/30/2012 12:35:44 PM	54286	BADGE VALID	1-1 Front Gate Reader	WALKER, JESSICA	N/A
6/30/2012 12:33:56 PM	53174	BADGE VALID	1-1 Front Gate Reader	LANGDON, DON	N/A
6/30/2012 12:31:38 PM	49042	BADGE VALID	1-1 Front Gate Reader	Badge: 49042	N/A
6/30/2012 12:29:52 PM	54316	BADGE VALID	1-1 Front Gate Reader	HERNANDEZ, BEATE	N/A
6/30/2012 12:26:26 PM	48998	BADGE VALID	1-1 Front Gate Reader	Badge: 48998	N/A
6/30/2012 12:25:34 PM	53338	BADGE VALID	1-1 Front Gate Reader	TOWER JR., WITNEY	N/A

Close Total Entries Print Entries

Entry Logs

Status Report

Time Zones

Message Box

Start Community Manage...

JOHN
GLOVE

Black Volvo C70
Decal # 54354

} REGISTERED To Neil

SAT
12:15 EAST
Gate
Blk Volvo

POA

From: Rubino, E Paul [RubinoP@pbso.org]
Sent: Tuesday, July 03, 2012 7:54 AM
To: 'POA'
Subject: RE: Plate Information

My cell number is 398-5031 call me after 0900. Thanks, Paul

From: POA [mailto:polopoa2@aol.com]
Sent: Monday, July 02, 2012 1:30 PM
To: Rubino, E Paul
Subject: Plate Information

Good Afternoon Paul,

We had an incident on Saturday with a vehicle and obtained the plate number. Would you be able to let us know who the car is registered to? Any help would be greatly appreciated. Also, I thought I had your cell phone number but I returned Mike's old phone and don't have the number stored in mine.

FL Tag – JAC005

Regards,

Daniel Polhamus
Director of Access Control
Palm Beach Polo Golf and Country Club
Office 561-798-7000 Ext. 7232
Fax 561-790-7114

7/10/2012



Palm Beach County Commission on Ethics

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Daniel T. Galo

Executive Director

Alan S. Johnson

June 8, 2012

Councilman Johnny Greene
Wellington Village Council
14000 Greenbriar Blvd.
Wellington, FL 33414

Re: RQO 12-045
Gift Law/Personal Friend

Dear Councilman Greene,

The Palm Beach County Commission on Ethics (COE) considered your request for an advisory opinion, and rendered its opinion at a public meeting held on June 7, 2012.

YOU ASKED in your email submission dated May 21, 2012, whether you may accept temporary housing from a personal friend who is a director of a civic organization that employs a lobbyist compensated by a third party, and if so, whether the value of the housing is reportable under the Palm Beach County Code of Ethics (the Code).

IN SUM, where a personal friend/donor is a director of a civic organization, and the organization is a *principal* or *employer* of a lobbyist, you are prohibited from accepting a gift from your friend/donor of a value in excess of \$100, annually in the aggregate.

Under the Code, elected officials, identified by state law as reporting individuals, are only required to report gifts pursuant to state law and file a copy of the report with the Palm Beach County Commission on Ethics (COE).

At all times, you may not use your official position corruptly to secure a benefit for the donor of a gift, or otherwise use your official position to obtain for yourself a financial benefit, not available to similarly situated members of the public. *"Corruptly", means done with a wrongful intent and for the purpose of obtaining, compensating or receiving compensation for, any benefit* resulting from some act or omission which is inconsistent with the proper performance of your public duties.

THE FACTS as we understand them are as follows:

You are a newly elected Councilman for the Village of Wellington (the Village). You have been offered temporary housing from a close, personal friend who you have known for 30 years. You frequently socialize together, he is a frequent guest at your current home and your close friendship is publicly known. The property will not become your permanent or primary residence. The temporary arrangement will be for no more than 90 days.

Your friend (the Donor) is not a vendor or lobbyist who does business with the Village. He is a retired businessman who currently owns a restaurant located within the Village. Nor do you have any business relationship with the donor or serve on any board, committee or commission together.

The Donor is a member of the board of directors of a civic organization that does engage in lobbying activity within the Village. The civic organization, Wellington Equestrian Preservation Alliance (the Alliance), is active in publicly advocating positions regarding the development of an area in the Village known as the Equestrian Preserve.

2633 Vista Parkway, West Palm Beach, FL 33411 561.233.0724 FAX: 561.233.0735

Hotline: 877.766.5920 E-mail: ethics@palmbeachcountyethics.com

Website: palmbeachcountyethics.com

According to the facts you submitted, the Donor does not provide financial support to this organization and "strictly acts in an advisory capacity." However, the Executive Director of the Alliance (ED) was hired and paid through Solar Sports Systems, Inc. (Solar) and does engage in lobbying activity for Solar within the Village. He also lobbies the Village on behalf of the Alliance. While the ED is a paid lobbyist for Solar, you stated that he receives no compensation in his capacity as the ED of the Alliance. However, the president of the Alliance apparently has a significant ownership interest in Solar.

THE LEGAL BASIS for this opinion is found in the following relevant sections of the revised Palm Beach County Commission on Ethics Ordinance and Code of Ethics, which took effect on June 1, 2011:

A public official may not use his or her official position or office to financially benefit him or herself, in a manner that will result in a special financial benefit not shared with similarly situated members of the general public, or otherwise corruptly obtain a special benefit for anyone if done with a wrongful intent, inconsistent with the proper performance of his or her public duties.¹ Additionally, an official may not accept a gift of any value if given because of an official action taken or legal duty performed or violated.²

Section 2-444(a) prohibits an elected official or employee from accepting a gift valued in excess of \$100, *from a vendor, lobbyist or any principal or employer of a lobbyist who lobbies, sells or leases* to his or her municipality. In determining the value of a gift, section 2-444(g) allows a recipient to consult §112.3148, Florida Statutes, and the Florida Administrative Code. Section 112.3148 states that lodging provided on consecutive days is considered a single gift and that lodging in a private residence is to be valued at the per diem rate as established in §112.061(6)(a), Florida Statutes. The state per diem lodging rate is currently \$44; therefore, the total value of a 90 day stay in a private residence would be \$3960. The value of the gift may be reduced by the Donee by compensating the Donor within 90 days.³

Section 2-444(d) states as follows:

For purposes of this section, a principal or employer of a lobbyist shall include any officer, partner or director of the principal entity, or any employee of a principal who is not an officer, partner or director, provided that the employee knows or should know with the exercise of reasonable care that the principal employs a lobbyist.

Therefore, since the Alliance is a principal or employer of a lobbyist, you may not accept a prohibited gift from a director of the Alliance. Lobbying means seeking to influence a decision of an item which may foreseeably be presented for consideration to an advisory board or a local governing body.

Section 2-442 defines lobbyist as follows:

Lobbyist shall mean any person who is employed and receives payment, or who contracts for economic consideration, for the purpose of lobbying on behalf of a principal, and shall include an employee whose principal responsibility to the employer is overseeing the employer's various relationships with government or representing the employer in its contacts with government.

If the person lobbying on behalf of the Alliance receives compensation for that representation, from whatever source, that person is a lobbyist and Alliance is the principal under the Code. While an exception may exist where a person lobbies as an employee of the principal organization, it applies in circumstances where lobbying is not the principal responsibility of the employee to the employer. Here, the Solar lobbyist is also the ED of the Alliance and lobbies on behalf of the Alliance. Recent issues involving land use decisions in the Village have been the subject of significant lobbying activity. This opinion relies upon the facts and circumstances you have provided, based upon

¹ Article XIII, §2-443(b)

² §2-444(e)

³ §112.3148(7)(b), Florida Statutes.

your knowledge and belief. Considering the facts and relationships that exist between the Alliance, Solar, the Alliance ED and the President of the Alliance, the COE cannot opine as to whether the employer/employee exception applies without further investigation into the relationships involved. Should an inquiry be commenced or a complaint filed in the matter, the issue would be decided by the facts uncovered through an inquiry or investigation. Due to these relationships and the potential appearance of impropriety, should you choose to accept the gift, you must take great care in relying on the employer/employee exception. It should be noted that the Code also prohibits a principal or employer of a lobbyist from knowingly giving a gift valued in excess of \$100, annually in the aggregate, to a person they know is an elected official of the municipality lobbied.⁴ The Donor, as a Director of the Alliance, is subject to this prohibition if the Alliance is the principal of a lobbyist.

As an elected official, you are required to *report gifts pursuant to state law... in the manner provided by Florida Statutes, §112.3148.*⁵ No other reporting requirements or exemptions apply under the Code. A copy of the state report must be submitted to the Palm Beach County Commission on Ethics.

IN SUMMARY, as an elected official, you may not accept a gift valued in excess of \$100, annually in the aggregate, from a director of an organization that employs a lobbyist who lobbies your municipality.

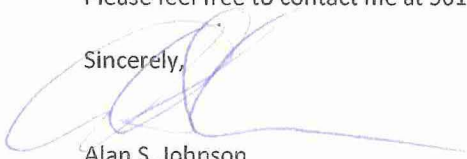
As a state reporting individual, the Code does not impose additional requirements other than the submission of a copy of any state required report to the COE.

In all instances, you may not accept a gift of any value in exchange for the past, present or future performance of an official act or a legal duty. Nor may you accept anything of value as a quid pro quo or otherwise corruptly misuse your office by giving someone a special benefit that is inconsistent with the proper performance of your duties.

This opinion construes the Palm Beach County Code of Ethics Ordinance and is based upon the facts and circumstances that you have submitted. 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 561-233-0724 if I can be of any further assistance in this matter.

Sincerely,



Alan S. Johnson
Executive Director

ASJ/gal

⁴ §2-443(a)(2) No lobbyist, vendor or principal or employer of a lobbyist that lobbies...a municipality shall knowingly give, directly or indirectly, any gift with a value greater than one hundred dollars (\$100) in the aggregate for the calendar year to a person who...is an official...of that municipality.

⁵ §2-444(f)(1)



Google earth

miles
km

1

2

Palm Beach Blvd
West End
Gate

Blue
Express

Nice
Hillside
Estate

Palm Beach Blvd
East End
Gate

AREA OUTLINED IN BLUE IS PALM BEACH BLVD

Google earth

Lake Lisbet

Marjorie Club Rd, Welli

Mark Bannon E.

From: JOHNNY GREENE [johnjgreene@bellsouth.net]
Sent: Tuesday, August 21, 2012 3:42 PM
To: Mark Bannon E.
Subject: FL Tag
Attachments: photo.JPG

Mark,

I guess I'm not perfect. I was close with my old tag number but it looks like I was off a little. See the attached photo for proof of what my previous tag number was.

It's amazing how the private security company contracted by Palm Beach Polo could have made the same mistake regarding a vehicle involved in an "incident". I wonder how they were able to retrieve the tag number off my vehicle if that tag never existed?

I am very sorry for the confusion. It was truly an honest mistake but hopefully this image clears things up for you. In my mind, it certainly proves that there was never an incident as reported to you in the complaint filed.

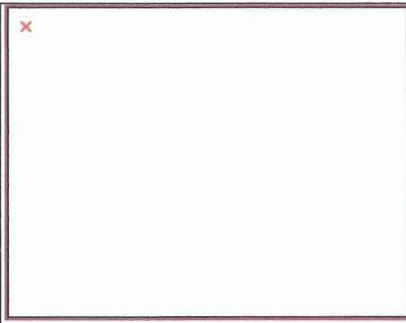
Please let me know if you need any additional information.

Regards,

John Greene
351-5762

--- On Tue, 8/21/12, John J Greene <johnjgreene@bellsouth.net> wrote:

John J. Greene
561-351-5762



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About the Wellington Equestrian Preservation Alliance

The primary goal of the Alliance is to support and preserve the equestrian community of the Village of Wellington. The corporation will work hard to encourage and promote cooperation among the equestrian community by staying focused to the rural equestrian lifestyle that has made Wellington a success.

Alliance President: Lou Jacobs

Board of Directors:

Neil Hirsch

Michael Whitlow

Executive Director: Mat Forrest

Contact:

Wellington Equestrian Preservation Alliance, Inc.



P.O. Box 213275

Royal Palm Beach, FL 33421-3275

(561) 291-8417

info@wellingtonalliance.com

Wellington Equestrian Preservation Alliance | P.O. Box 213275
Royal Palm Beach, FL 33421 | 561-291-8417

FLORIDA DEPARTMENT OF STATE DIVISION OF CORPORATIONS					
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Previous on List Next on List Return To List			Entity Name Search		
Events No Name History			<input type="button" value="Submit"/>		
Detail by Entity Name					
Florida Non Profit Corporation					
WELLINGTON EQUESTRIAN PRESERVATION ALLIANCE, INC.					
Filing Information					
Document Number	N11000009940				
FEI/EIN Number	453943275				
Date Filed	10/20/2011				
State	FL				
Status	ACTIVE				
Last Event	AMENDMENT				
Event Date Filed	12/09/2011				
Event Effective Date	NONE				
Principal Address					
3600 NORTH FEDERAL HIGHWAY THIRD FLOOR, BANK OF AMERICA BUILDING FORT LAUDERDALE FL 33308					
Mailing Address					
3600 NORTH FEDERAL HIGHWAY THIRD FLOOR, BANK OF AMERICA BUILDING FORT LAUDERDALE FL 33308					
Registered Agent Name & Address					
PANZA, THOMAS F ESQ. 3600 NORTH FEDERAL HIGHWAY THIRD FLOOR, BANK OF AMERICA BUILDING FORT LAUDERDALE FL 33308 US					
Officer/Director Detail					
Name & Address					
Title D					
JACOBS, LOUIS 3600 NORTH FEDERAL HIGHWAY, THIRD FLOOR FORT LAUDERDALE FL 33308-6225					
Title D					
HIRSCH, NEIL 3600 NORTH FEDERAL HIGHWAY, THIRD FLOOR FORT LAUDERDALE FL 33308-6225					
Title D					
CLARK, JANE 3600 NORTH FEDERAL HIGHWAY, THIRD FLOOR					

FORT LAUDERDALE FL 33308-6225

Title D

WHITLOW, MICHAEL
3600 NORTH FEDERAL HIGHWAY, THIRD FLOOR
FORT LAUDERDALE FL 33308-6225

Title D

FORREST, MATTHEW J
3600 NORTH FEDERAL HIGHWAY, THIRD FLOOR
FORT LAUDERDALE FL 33308-6225

Annual Reports

Report Year Filed Date

2012 01/05/2012

Document Images

[01/05/2012 -- ANNUAL REPORT](#)

View image in PDF format

[12/09/2011 -- Amendment](#)

View image in PDF format

[10/20/2011 -- Domestic Non-Profit](#)

View image in PDF format

Note: This is not official record. See documents if question or conflict.

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State of Florida, Department of State

From: "Mat Forrest" <mat@ballardfl.com>

Subject: RE: Letter of resignation

Date: June 8, 2012 12:41:23 PM EDT

To: "Neil Hirsch" <neilshirsch@aol.com>

Dear Neil,

Thank you Neil for your assistance and support. I will inform the rest of the board including Lou Jacobs, President. I will also work on removing you from our State incorporation documents.

We look forward to working with you again in the future and of course your voice as a Wellington resident and business owner will always be heard by our group.

Have a great summer,
Mat

-----Original Message-----

From: Neil Hirsch [mailto:neilshirsch@aol.com]

Sent: Friday, June 08, 2012 7:39 AM

To: Mat Forrest

Subject: Letter of resignation

Dear Mat,

Please accept this as my formal resignation as Director from the Wellington Equestrian Preserve Alliance.

Thank You

Neil S. Hirsch

Golf Capital of the World

14500V

FLORIDA



1560498
11-09
FL
VEHICLE
JASON



Palm Beach County Commission on Ethics

Commissioners

Manuel Farach, Chair
Robin N. Fiore, Vice Chair
Edward Rodgers
Ronald E. Harbison
Daniel T. Galo

Executive Director

Alan S. Johnson

August 17, 2012

Mr. John J. Greene
11226 Maritime Court
Wellington, FL 33467

Re: C12-006

Dear Mr. Greene,

This is to inform you that a complaint was filed against you in the above referenced matter on July 26, 2012. Attached please find a copy of the complaint as well as additional documents prepared by the Commission on Ethics Staff. This information is not a public record until probable cause is found or the complaint is dismissed by the Commission.

On September 6, 2012 this matter will be heard by the Commission on Ethics. For the reasons contained in the reports, Staff is recommending that the complaint be dismissed.

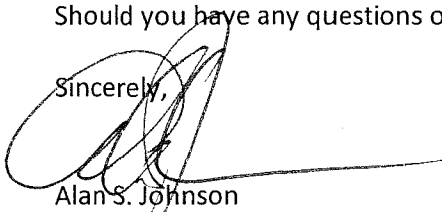
You are not required to attend the public session; however, if you wish to attend, the session will take place at the following time and location:

September 6, 2012 @ 1:30 P.M.
Palm Beach County Governmental Center
301 North Olive Avenue
12th Floor, McEaddy Conference Room
West Palm Beach, FL 33401

As indicated, it will be the Commission on Ethics Staff recommendation that the above referenced complaint be dismissed. If the Commission on Ethics does not dismiss the complaint, no other action will be taken at that time and you will be notified of any future proceedings or requirements.

Should you have any questions or concerns regarding the above, please feel free to contact me at 561-233-0736.

Sincerely,



Alan S. Johnson
Executive Director

Enclosures

ASJ/gal