



*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](mailto: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*

April 16, 2026 – 1:30 p.m.

Governmental Center,  
301 North Olive Avenue, 6<sup>th</sup> Floor  
Commissioners Chambers

**Meeting will begin at 1:30pm  
Executive Session will begin at 2:00pm  
Regular Agenda will resume immediately  
following the Executive Session**

- I. Call to Order
- II. Pledge of Allegiance
- III. Roll Call
- IV. Introductory Remarks
- V. Approval of Minutes from March 5, 2026
- VI. Presentation to Former Commissioner Michael S. Kridel
- VII. Processed Advisory Opinions (Consent Agenda)
  - a. RQO 26-005
  - b. RQO 26-006
  - c. RQO 26-007
  - d. RQO 26-008
- VIII. Items Pulled from Consent Agenda
  - a.
- IX. Executive Session C25-013
- X. Executive Director Comments
- XI. Commission Comments
- XII. Public Comments
- XIII. 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  
MARCH 5, 2026**

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

**WEISMAN GOVERNMENTAL CENTER  
COMMISSION CHAMBERS**

**MEMBERS:**

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

**COMMISSION ON ETHICS STAFF PRESENT**

Rhonda Giger, COE General Counsel  
Mark Higgs, COE Investigator II  
Abigail Irizarry, COE Investigator II  
Christie E. Kelley, COE Director III

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

Karla Perez, Deputy Clerk

**I. Call to Order by Executive Director**

Ms. Kelley called the meeting to order at 1:34 p.m.

**II. Introductory Remarks**

No comments were made.

**III. Swearing-in ceremony by Judge Danielle Sherriff**

Judge Danielle Sherriff performed the swearing-in.

- a. Rodney G. Romano-Appointed by the Palm Beach County League of Cities
- b. Peter L. Cruise-Appointed by the president of FAU
- c. Alan I. Blass-Appointed by Palm Beach Chapter of Association of Certified Fraud Examiners

**IV. Roll Call**

All members were present.

**V. Nomination and election of new Chairperson (to begin presiding over meeting immediately upon election)**

Ms. Kelley opened the floor for the nomination of chairperson.

Commissioner Vara-Garcia nominated Commissioner Romano as chair, and Commissioner Kugler seconded the nomination.

Commissioner Romano accepted the nomination of chairperson.

No other nominations were made.

Commissioner Romano was appointed as chair for the term of one year.

Ms. Kelley passed the gavel to Chair Romano.

**VI. Nomination and election of new Vice Chairperson**

Chair Romano opened the floor for nominations of vice chairperson.

Commissioner Kugler nominated Commissioner Blass as vice chair, and Commissioner Vara-Garcia seconded the nomination.

No other nominations were made.

Commissioner Blass was appointed as vice chair for a term of one year.

**VII. Approval of Minutes from February 5, 2026.**

**MOTION to approve the minutes. Motion by Commissioner Kugler, seconded by Commissioner Cruise, and carried 5-0.**

**VIII. Executive Session C25-014**

**RECESS**

**At 1:38 p.m., the chair declared the meeting recessed for the executive session.**

**RECONVENE**

**At 1:52 p.m., the meeting reconvened with all members present.**

*In re: Leondrae Camel*

C25-014

Vice Chair Blass read the following final order into the record:

Complainant, Barbara King, filed the above referenced complaint alleging that Respondent, Leondrae Camel, City Manager of the City of South Bay, may have used his position for personal gain, in violation of Section 2-443(a), Misuse of public office or employment, of the Palm Beach County Code of Ethics.

Pursuant to Section 2-258(a) 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.<sup>1</sup> On March 5, 2026, the Commission conducted a probable cause hearing. After reviewing the Report of investigation and the Probable Cause Recommendation and listening to a statement from the Advocate and Respondent, the Commission concluded that probable cause did not exist because there was no evidence that Respondent took any action that violated the Palm Beach County Code of Ethics.

Therefore, it is:

**ORDERED AND ADJUDGED** that the complaint against Respondent, Leondrae Camel, is hereby DISMISSED.

**DONE AND ORDERED** by the Palm Beach County Commission on Ethics in public session on March 5, 2026.

**IX. Executive Director Comments**

Ms. Kelley reported the following updates:

1.

Staff attended the Junior Achievement event at Dr. Joaquin Garcia High School.

2.

Staff participated in the Ethical Governance Day at Boynton Beach High School and hosted a Senior Social Event at the West Boca Branch Library.

3.

Staff had resumed attending municipality meetings and providing ethics training courses.

4.

The following took place on Tuesday, March 3, 2026:

- Commissioner Powell presented a proclamation declaring March as Ethics Awareness Month in Palm Beach County.
- The City of Lake Worth Beach issued a similar proclamation at its council meeting, and the City of Palm Beach Gardens would be issuing a proclamation tonight.
- Staff hosted a joint meet-and-greet event with the Office of Inspector General at the Governmental Center Courtyard.

5.

It was announced that the COE Review Committee met yesterday to discuss the following items:

- the proposed changes to the COE ordinance to ensure that the COE ordinance followed Florida Statutes;
- the elimination of local ethics agencies' ability to self-initiate complaints;
- a process to recover costs and fees for frivolous complaints; and
- the presentation to the BCC for review and approval.

Ms. Kelley thanked David Baker, Clevis Headley, Leondrae Camel, Michael Napleton, Keith Davis, and David Behar for volunteering their time to be a part of the COE Review Committee. She also welcomed Florida Atlantic University intern Kev Simpson, who was serving as the community engagement ambassador.

#### **X. Commission Comments**

Commissioner Cruise welcomed Vice Chair Blass to the committee.

Vice Chair Blass stated that he was honored to be a part of the committee, and he thanked his fellow commissioners for the opportunity.

#### **XI. Public Comments**

No comments were provided.

#### **XII. Adjournment**

**MOTION to adjourn. Motion by Commissioner Vara-Garcia, seconded by Commissioner Kugler, and carried 5-0.**

**At 2:07 p.m., the chair declared the meeting adjourned.**



# 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

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March 6, 2026

Edmond C. LeBlanc  
105 South K Street  
Lake Worth Beach, FL 33460

Re: RQO 26-005  
Voting conflict/Conflict of interest

Dear Mr. LeBlanc,

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) prohibit you from participating in discussions or voting on a matter before the Lake Worth Beach Historic Resources Preservation Board (HRPB) regarding the consideration for site plan approval and various decisions related to a project that is located near your personal residence?

**BRIEF ANSWER:**

You are not prohibited from participating in discussions or voting on these matters because the size of the class affected by this project is large enough.

**FACTS:**

You serve as a member of the HRPB advisory board. The HRPB's function is to review and address historic preservation issues. A significant project that involves decisions surrounding a major Site Plan approval, Mixed Use Urban Planned Development, Conditional Use Permit, Right of Way Abandonment, Sustainable Bonus Incentive, Certificate of Appropriateness for relocation of a historic structure, Certificate of Appropriateness for additions and alterations, and a Certificate of Appropriateness for new construction of a parking garage structure will be coming before the HRPB. The HRPB will be the final decision-making body for the three Certificates of Appropriateness applications as well as the Major Site Plan and Conditional Use Permit application. It is also an advisory body for the Mixed Use Urban Planned Development, Right of Way Abandonment and Sustainable Bonus Incentive portions of this matter. You do not have any financial or other ties to the developer or to anyone else associated with the project.

However, you own a home and live near the site of the project. The project area encompasses parcels 13 South K St., 19 South K Street, 25 South K Street, 710 1st

Avenue South, and 704 1st Avenue South. According to City staff, this item has not yet been scheduled on a specific agenda and the formal materials related to the project are unavailable. City staff anticipates this will ultimately be heard within the next 60 days.

**ANSWER:**

The Code prohibits public officials from using their official position in any manner which would result in a special financial benefit, not shared with similarly situated members of the general public, to certain persons or entities, including to themselves.<sup>1</sup> Similarly, the Code also prohibits public officials from voting on an issue or participating in any matter coming before their board which would result in a special financial benefit to themselves.<sup>2</sup>

Whether a matter rises to the level of a prohibited conflict of interest depends on whether the official would receive any special financial benefit. The COE has previously opined that "financial benefit" constitutes an economic gain or loss.<sup>3</sup>

In evaluating a potential conflict of interest under the Code, the COE considers how many persons stand to gain or lose financially from a decision and whether the gain or loss is remote and speculative. As the COE has previously opined, there is no bright-line rule for determining the number of individuals who would need to be similarly affected to transform a personal gain into a gain or loss shared with similarly situated members of the general public.<sup>4</sup> Therefore, when determining whether a measure will result in a financial benefit that is not shared with similarly situated members of the general public, the COE considers the size of the class of persons who will receive an economic gain or loss from the measure.<sup>5</sup> Where the size of the class is large, a prohibited financial benefit or loss generally exists only when there are circumstances unique to the official that would enable the official's property to benefit more than other property owners within the class. However, where the class of persons who stand to gain or lose from a decision is small, it is more likely that an official will have a conflict.<sup>6</sup>

The general line drawn by the COE, and the Florida Commission on Ethics, is that no voting conflict is present when the official's interest represents 1% or less of the class, that is, when 100 or more ownership entities are affected.<sup>7</sup> While the "1% Rule" may appear arbitrary, it provides certainty and guidance in an area of the law that otherwise lacks clarity.

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<sup>1</sup> Section 2-443(a), *Misuse of public office or employment*.

<sup>2</sup> Section 2-443(c), *Disclosure of voting conflicts*.

<sup>3</sup> RQO 10-013 (For the purpose of ordinance construction, the commission finds that a financial benefit includes either a private gain or loss).

<sup>4</sup> *Id.*

<sup>5</sup> RQO 14-036

<sup>6</sup> CEO 92-37 (two percent or eight percent of the property to be affected is of sufficient size to result in a "special" gain); CEO 93-19 (measure to construct a sidewalk affecting 40 homes would not affect enough persons in order for its effect not to be considered "special" under the voting conflicts law).

<sup>7</sup> CEO 78-96; CEO 84-80; CEO 87-18; CEO 87-95; CEO 92-52; CEO 93-12

Here, the area in the immediate vicinity of the project consists of well over 100 ownership entities. The size of the class affected in this scenario was determined by including all the parcels within the eight city blocks surrounding the project, rather than limiting the analysis to the properties directly adjacent to the project. This is because the nature of this project is expected to affect an area far greater than the properties located immediately next to the project property.

Accordingly, your interest in the area represents less than one percent of the affected class. In addition, there is nothing in the facts currently indicating that the location of your property creates a unique circumstance such that your personal gain or loss from this vote would be significantly greater than that of other property owners in the immediate vicinity of the project. Therefore, based on the facts provided, because the economic gain or loss resulting from this project affects a class large enough to remove any prohibited individual financial benefit, you are not prohibited from voting on or participating in discussions related to this project.

Additionally, as a general reminder, Sec. 2-443(b), Corrupt misuse of official position, prohibits public officials from using their official position to corruptly secure or attempt to secure a special privilege, benefit or exemption for themselves or others. Corruptly means the action is 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. Therefore, you must ensure you do not use your position as an appointed official to take any action that would corruptly secure a special privilege, benefit, or exemption for yourself or anyone else.

Finally, while the Code does not restrict your participation or voting as long as the guidance in this opinion is followed, you must remain mindful that as a public official, no quid pro quo or other benefit may be given in exchange for an official act or the past, present, or future performance of a public duty.<sup>8</sup> You are also reminded that if any of the facts relied upon in this opinion change, you should contact the COE to request an updated opinion.

### **LEGAL BASIS:**

The legal basis for this opinion is found in Sec. 2-443(a) and Sec. 2-444(c) 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, 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;

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<sup>8</sup> Section 2-444(e), *Gift law*.

(c) **Disclosure of voting conflicts.** County and municipal officials as applicable shall abstain from voting and not participate in any matter that will result in a special financial benefit as set forth in subsections (a)(1) through (7) above. The term “participate” as used in this section shall be defined as: “To take any action, or to influence others to take any action, or to attempt to do any of these things, in order to affect the passage or defeat of the specific matter before the voting body in which the official is required to abstain from voting.”

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.

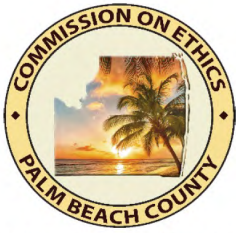
Please feel free to contact me at 561-355-1915 if you need further assistance in this matter.

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

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March 23, 2026

Fran Nachlas, Councilmember  
City of Boca Raton  
201 West Palmetto Park Road  
Boca Raton, Florida 33432

Re: RQO 26-006  
Voting conflict/Conflict of interest

Dear Ms. Nachlas,

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) prohibit you from participating in discussions or voting on a matter related to "The Boca Raton," considering you have a paid membership at the resort?

**BRIEF ANSWER:**

You are not prohibited from participating in discussions or voting on these matters because a prohibited entity is not involved; thus, there is no danger of an improper special financial benefit.

**FACTS:**

You serve as a member of the Boca Raton City Council. In your private capacity, you maintain a membership at "The Boca Raton" (TBR). TBR is a private membership club within the City of Boca Raton (City), but unrelated to City governance. TBR provides its members with access to its resort campus along with other services and amenities. TBR has over 10,000 paying members.

An item related to TBR is on the upcoming agenda.<sup>1</sup> The agenda item will address universal conditional amendments to the Land Use Comprehensive Plan, rezoning, authorization of construction, and site plan approval.<sup>2</sup>

<sup>1</sup> Item 11A (1-4), including Ord. 5780, Ord. 5781, Resolution 16-2026 and Resolution 17-2026 will be discussed and voted on.

<sup>2</sup> The description above was condensed from the actual agenda which can be found here: [Boca Raton Council Agenda 3/24/2026](#)

You do not own any property at TBR, nor do you have any business relationship with it beyond your paid membership. Additionally, you do not have any financial or other ties to the developer or to anyone else associated with the project.

**ANSWER:**

The Code prohibits public officials from using their official position in any manner which would result in a special financial benefit, not shared with similarly situated members of the general public, to certain persons or entities, including to themselves or any other prohibited entity.<sup>3</sup> Similarly, the Code also prohibits public officials from voting on an issue or participating in any matter coming before their board which would result in a special financial benefit to themselves or a prohibited entity.<sup>4</sup>

Based on the facts provided, your paid membership at TBR does not make it a prohibited entity under the Code. An organization to which you pay a membership is not included among the prohibited entities listed in Sec. 2-443(a)(1-7). Thus, considering that your participation or vote would not result in a financial benefit to you or any other prohibited entity, there is no inherent voting conflict related to these agenda items. Additionally, there is nothing in the facts provided to indicate there would be any personal gain or loss to you were the project to be either approved or rejected. Because of this, the Code does not prohibit your vote or discussion on the agenda items related to TBR.

As a general reminder, Sec. 2-443(b), Corrupt misuse of official position, prohibits public officials from using their official position to corruptly secure or attempt to secure a special privilege, benefit or exemption for themselves or others. Corruptly means the action is 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. Therefore, you must ensure you do not use your position as an appointed official to take any action that would corruptly secure a special privilege, benefit, or exemption for yourself or anyone else, including TBR.

Finally, while the Code does not restrict your participation or vote as long as the guidance in this opinion is followed, you must remain mindful that as a public official, no quid pro quo or other benefit may be given in exchange for an official act or the past, present, or future performance of a public duty.<sup>5</sup> You are also reminded that if any of the facts relied upon in this opinion change, you should contact the COE to request an updated opinion.

**LEGAL BASIS:**

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

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<sup>3</sup> Section 2-443(a), *Misuse of public office or employment.*

<sup>4</sup> Section 2-443(c), *Disclosure of voting conflicts.*

<sup>5</sup> Section 2-444(e), *Gift law.*

**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;
  - (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 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.
- (b) **Corrupt misuse of official position.** An official or employee shall not use or attempt to 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.
- (c) **Disclosure of voting conflicts.** County and municipal officials as applicable shall abstain from voting and not participate in any matter that will result in a special financial benefit as set forth in subsections (a)(1) through (7) above. The term "participate" as used in this section shall be defined as: "To take any action, or to influence others to take any action, or to attempt to do any of these things, in order to affect the passage or defeat of the

specific matter before the voting body in which the official is required to abstain from voting.”

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

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March 31, 2026

Erik Range, Chief of Staff  
Office of the Mayor  
City of Riviera Beach  
600 W Blue Heron Blvd  
Riviera Beach, FL, 33404

Re: RQO 26-007  
Prohibited conduct/travel expenses

Dear Mr. Range,

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) prohibit you from accepting travel expenses from a prospective vendor of the City of Riviera Beach (City)?

**BRIEF ANSWER:**

Yes, you are prohibited from accepting travel expenses from a prospective vendor unless a waiver is obtained. The Code provides an exception for travel expenses, including those paid by a bidder or prospective vendor, when the travel is for governmental purposes and is related to your duties and responsibilities as a City employee as long as the expenses are waived in advance by a majority vote of the City Council.

**FACTS:**

You are a City employee, serving as the Chief of Staff for Mayor Douglas Lawson.

The Capella Music Festival (CMF) is an event that is currently held in the Cayman Islands. Kenny Rankin, the organizer and director of the festival, has contacted you to explore the possibility of expanding the festival to the City. Mr. Rankin has invited you and Mayor Lawson to attend their next scheduled concert so you can experience how their business model works while in the concert atmosphere. CMF and Mr. Rankin would like to facilitate this interaction by providing airfare and hotel accommodations as well as attendance at a VIP dinner and access to the music festival.

According to the information you provided, CMF ultimately seeks to enter into a long-term partnership with the City to support tourism and encourage economic growth. To this end, CMF endeavors to bring together international audiences and local businesses within the City. You expect the resulting partnership will have a beneficial impact on the City.

Neither you nor anyone in the mayor's office has financial ties to CMF, or to its officers or founders.

**ANSWER:**

In general, public officials and employees are prohibited from accepting, directly or indirectly, payment of travel expenses "from any county or municipal contractor, vendor, service provider, bidder or proposer."<sup>1</sup> The Code considers travel expenses to include meals, transportation, lodging, registration fees, and other incidentals. However, the prohibition against accepting travel expenses may be waived by a majority vote of the local municipal governing body, as applicable. Under the Code, this prohibition may only be waived if the travel and attendance is for a governmental purpose related to your duties and responsibilities as a City employee.<sup>2</sup> The waiver process is intended to ensure the transparency of the transaction.

Based on the facts provided, because CMF is a bidder or proposer of the City, you are prohibited from accepting any travel expenses from CMF, directly or indirectly, unless it is waived by a majority vote of the City Council. If the City Council grants the waiver and your attendance is in your official capacity and related to your duties as a City employee, any waived or reimbursed travel expenses associated with this trip would not be considered a gift under the Code. Because the waived expenses are not considered a gift, they do not need to be reported to the COE.<sup>3</sup> Additionally, as long as only the waived travel expenses are included, CMF may either arrange and pay for the costs in advance or reimburse you after the travel has concluded.

Additionally, the Code prohibits public employees from using their official position in any way to give a special financial benefit not shared with similarly situated members of the general public for certain persons or entities, including themselves.<sup>4</sup> Because the waiver of travel expenses would result in you receiving a special financial benefit, you are prohibited from using your official position with the City in any way to influence the matter. This includes taking or failing to take any action, influencing others to take or fail to take some action, or attempting to do any of those things, in connection with the approval of the travel expenses.

Further, you must remember that as a public employee, no quid pro quo or any other benefit may ever be given for an official act or for the past, present, or future performance of a public duty.<sup>5</sup> You are also reminded that public officials and employees are prohibited from using their official position to corruptly secure or attempt to secure a special privilege, benefit, or exemption

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<sup>1</sup> Sec. 2-443(f), Accepting travel expenses.

<sup>2</sup> Id.

<sup>3</sup> Sec. 2-444(g)(8), Gift law.

<sup>4</sup> Sec. 2-443(a), Misuse of public office or employment.

<sup>5</sup> Sec. 2-444(e), Gift law.

for themselves or others.<sup>6</sup> 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.<sup>7</sup>

You are also reminded that, while attending the CMF event, you are prohibited from soliciting or accepting any gift in excess of \$100, other than the waived travel reimbursement as described above, from any vendor, lobbyist, or principal or employer of a lobbyist who lobbies, sells, or leases to the City.<sup>8</sup> If, while attending the CMF event, you receive anything of value exceeding \$100 from any person or entity who is not a vendor, lobbyist, or principal of a lobbyist of the City, the gift must be reported on your annual gift report.<sup>9</sup>

### **LEGAL BASIS:**

The legal basis for this opinion is found in Sec. 2-443(a), Sec. 2-443(f) and Sec. 2-444(g) 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, 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;
- (f) ***Accepting travel expenses.*** No official or employee shall accept, directly or indirectly, any travel expenses including, but not limited to, transportation, lodging, meals, registration fees and incidentals from any county or municipal contractor, vendor, service provider, bidder or proposer as applicable. The board of county commissioners or local municipal governing body as applicable may waive the requirements of this subsection by a majority vote of the board or local municipal governing body. The provisions of this subsection shall not apply to travel expenses paid by other governmental entities or by organizations of which the county or municipality as applicable is a member if the travel is related to that membership.

#### **Sec. 2-444. Gift law.**

- (g) Exceptions. For the purposes of this section, the following shall not be considered a gift:
- (8) Registration fees and other related costs associated with educational or governmental conferences, meetings or seminars and travel expenses either properly waived or inapplicable pursuant to section 2-443(f), provided that attendance is for governmental

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<sup>6</sup> Sec. 2-443(b), Corrupt misuse of official position.

<sup>7</sup> Id.

<sup>8</sup> Sec. 2-444(a)(1), Gift law.

<sup>9</sup> Sec. 2-444(f)(2)b, Gift law.

purposes, and attendance is related to his or her duties and responsibilities as an official or employee of the county or municipality;

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,

A handwritten signature in blue ink, appearing to read 'CK', with a long horizontal line extending to the right.

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*

March 31, 2026

Douglas Lawson, Mayor  
City of Riviera Beach  
600 W Blue Heron Blvd  
Riviera Beach, FL, 33404

Re: RQO 26-008  
Prohibited conduct/travel expenses/conflict of interest

Dear Mr. Lawson,

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) prohibit you from accepting travel expenses from a prospective vendor of the City of Riviera Beach (City)?

**BRIEF ANSWER:**

Yes, you are prohibited from accepting travel expenses from a prospective vendor unless a waiver is obtained. The Code provides an exception for travel expenses, including those paid by a bidder or prospective vendor, when the travel is for governmental purposes and is related to your duties and responsibilities as a City official as long as the expenses are waived in advance by a majority vote of the City Council.

**FACTS:**

You currently serve as the Mayor of the City of Riviera Beach, having been selected and appointed by the City Council in April 2025.<sup>1</sup> The City has a Mayor-Council-Manager form of government, in which the City Council appoints the city manager as the chief executive officer to manage the day-to-day operations of the City. The mayor, in the Mayor-Council-Manager form of government, does not vote on issues before the City Council.

The Capella Music Festival (CMF) is an event that is currently held in the Cayman Islands. Kenny Rankin, the organizer and director of the festival, has contacted you to explore the possibility of

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<sup>1</sup> The office of Mayor would normally be an elected position. In your case, the City Council held a special meeting to select the mayor from a pool of applicants after no candidates appeared on the March 2025 ballot due to a filing error.

expanding the festival to the City. Mr. Rankin has invited you and Eric Range, your Chief of Staff, to attend the next scheduled CMF concert so you can experience how their business model works while in the concert atmosphere. CMF and Mr. Rankin would like to facilitate this interaction by providing airfare and hotel accommodations as well as attendance at a VIP dinner and access to the music festival.

According to the information you provided, CMF ultimately seeks to enter into a long-term partnership with the City to support tourism and encourage economic growth. To this end, CMF endeavors to bring together international audiences and local businesses within the City. You expect the resulting partnership will have a beneficial impact on the City. Neither you nor anyone in the mayor's office has financial ties to CMF, or to its officers or founders.

**ANSWER:**

In general, public officials and employees are prohibited from accepting, directly or indirectly, payment of travel expenses "from any county or municipal contractor, vendor, service provider, bidder or proposer."<sup>2</sup> The Code considers travel expenses to include meals, transportation, lodging, registration fees, and other incidentals. However, the prohibition against accepting travel expenses may be waived by a majority vote of the local municipal governing body, as applicable. Under the Code, this prohibition may only be waived if the travel and attendance is for a governmental purpose related to your duties and responsibilities as a City official.<sup>3</sup> The waiver process is intended to ensure the transparency of the transaction.

Based on the facts provided, because CMF is a bidder or proposer, you are prohibited from accepting any travel expenses from CMF, directly or indirectly, unless it is waived by a majority vote of the City Council. If the City Council grants the waiver and your attendance is in your official capacity and related to your duties as a City official, any waived or reimbursed travel expenses associated with this trip would not be considered a gift under the Code.<sup>4</sup> Because the waived expenses are not considered a gift, they do not need to be reported on a gift form. Moreover, as long as only the waived travel expenses are included, CMF may either arrange and pay for the costs in advance or reimburse you after the travel has concluded.

Additionally, the Code prohibits public officials from using their official position in a manner, including voting on or participating in discussions on a matter, that would result in a special financial benefit not shared with similarly situated members of the general public for certain persons or entities, including themselves.<sup>5</sup> Because the waiver of travel expenses would provide you with a special financial benefit, you are prohibited from participating in any discussions with City Council regarding the travel expenses when the matter comes before the board. Were you a voting member of the Council, you would also be required to abstain from voting on the waiver of travel expenses. However, because the mayor is not a voting member of the Council, you would not vote on this matter. Additionally, because you will be the recipient of the travel

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<sup>2</sup> Sec. 2-443(f), Accepting travel expenses.

<sup>3</sup> Id.

<sup>4</sup> Sec. 2-444(g)(8), Gift law.

<sup>5</sup> Sec. 2-443(a), Misuse of public office or employment, Sec. 2-443(c), Disclosure of voting conflicts.

expenses, you may not use your official position or office in any way, 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 in any action related to the approval of the travel expenses.

Further, you must remember that as a public official, no quid pro quo or any other benefit may ever be given for an official act or for the past, present, or future performance of a public duty.<sup>6</sup> You are also reminded that public officials and employees are prohibited from using their official position to corruptly secure or attempt to secure a special privilege, benefit, or exemption for themselves or others.<sup>7</sup> 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.<sup>8</sup>

You are also reminded that, while attending the CMF event, you are prohibited from soliciting or accepting any gift in excess of \$100, other than the waived travel reimbursement as described above, from any vendor, lobbyist, or principal or employer of a lobbyist who lobbies, sells, or leases to the City.<sup>9</sup> If, while attending the CMF event, you receive anything of value exceeding \$100 from any person or entity who is not a vendor, lobbyist, or principal of a lobbyist of the City, the gift must be reported on your annual gift report.<sup>10</sup>

#### **LEGAL BASIS:**

The legal basis for this opinion is found in Sec. 2-443(a), Sec. 2-443(c), Sec. 2-443(f), and Sec. 2-444(g) 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, 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;

(c) ***Disclosure of voting conflicts.*** County and municipal officials as applicable shall abstain from voting and not participate in any matter that will result in a special financial benefit as set forth in subsections (a)(1) through (7) above. The term "participate" as used in this section shall be defined as: "To take any action, or to influence others to take any action, or to attempt to do any of these things, in order to affect the passage or defeat of the specific matter before the voting body in which the official is required to abstain from voting." The

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<sup>6</sup> Sec. 2-444(e), Gift law.

<sup>7</sup> Sec. 2-443(b), Corrupt misuse of official position

<sup>8</sup> Id.

<sup>9</sup> Sec. 2-444(a)(1), Gift law.

<sup>10</sup> Sec. 2-444(f)(1), Gift law.

official shall publicly disclose the nature of the conflict and when abstaining from the vote, shall complete and file a State of Florida Commission on Ethics Conflict Form 8B pursuant to the requirements of Florida Statutes, §112.3143. Simultaneously with filing Form 8B, the official shall submit a copy of the completed form to the county commission on ethics. Officials who abstain and disclose a voting conflict as set forth herein, shall not be in violation of subsection (a), provided the official does not otherwise use his or her office to take or fail to take any action, or influence others to take or fail to take any action, in any other 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, as set forth in subsections (a)(1) through (7).

- (f) **Accepting travel expenses.** No official or employee shall accept, directly or indirectly, any travel expenses including, but not limited to, transportation, lodging, meals, registration fees and incidentals from any county or municipal contractor, vendor, service provider, bidder or proposer as applicable. The board of county commissioners or local municipal governing body as applicable may waive the requirements of this subsection by a majority vote of the board or local municipal governing body. The provisions of this subsection shall not apply to travel expenses paid by other governmental entities or by organizations of which the county or municipality as applicable is a member if the travel is related to that membership.

**Sec. 2-444. Gift law.**

- (g) Exceptions. For the purposes of this section, the following shall not be considered a gift:
- (8) Registration fees and other related costs associated with educational or governmental conferences, meetings or seminars and travel expenses either properly waived or inapplicable pursuant to section 2-443(f), provided that attendance is for governmental purposes, and attendance is related to his or her duties and responsibilities as an official or employee of the county or municipality;

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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