

Annual Report 2025



January 2026

This past year, we celebrated a very special anniversary. Fifteen years ago, the voters of Palm Beach County made a powerful and decisive decision: they chose to create an independent watchdog agency dedicated to upholding the principles of transparency, integrity, and accountability in local government.

This decision marked the beginning of a vital undertaking by the newly created Palm Beach County Commission on Ethics — one that remains as relevant and essential today as it was back then. At the heart of its mission is fostering integrity in public service and increasing the public's trust in government. During the past 15 years, the Commission has navigated many challenges and celebrated numerous successes.

From the very start, the strong dedication of elected officials, employees, county and community leaders, and volunteers has brought our mission to life. We thank all of you for your tireless efforts, unwavering dedication, and lasting contributions to our mission. You have laid the foundation for our success and shaped a vibrant, ethical culture.

The community's enthusiasm and tireless efforts on behalf of the Palm Beach County Commission on Ethics have also been instrumental to our continued progress and success. Together, there is no limit to what we can achieve.

This year's annual report highlights both our achievements and the ongoing challenges that shape our work. Behind every case reviewed and training delivered is a shared belief that ethical conduct matters—that it is the cornerstone of a culture built on integrity and accountability. Your support has made this work possible, and for that, we are deeply grateful.

As we celebrate another year together, we do so with a renewed commitment to serving our community with integrity and to upholding the values that have defined us over the past 15 years. We look forward to many more anniversaries filled with new milestones, shared accomplishments, and meaningful celebrations.

Kind regards,

Christie Kelley
Executive Director



CONTENTS

- 01** | EXECUTIVE SUMMARY
- 03** | COMMISSION ON ETHICS
 - MISSION
 - COMMISSIONERS AND STAFF
 - FISCAL REPORT
- 10** | STRATEGIC PLAN 2022–2027
- 12** | CUSTOMER SATISFACTION
- 16** | 2024 ACHIEVEMENTS
 - ADMINISTRATIVE
 - EDUCATION AND OUTREACH
 - LEGAL AFFAIRS
 - ENFORCEMENT
- 26** | CELEBRATING 15 YEARS
- 28** | ADVANCING OUR MISSION
- 30** | APPENDIX
 - PALM BEACH COUNTY CODE OF ETHICS



EXECUTIVE SUMMARY

Fulfilling Our Mission

Since its inception in 2010, the Palm Beach County Commission on Ethics (the Commission) has been essential in fostering a culture of accountability and integrity among public servants. The Commission provides educational programs and initiatives, oversees legal compliance and investigates potential breaches of ethical conduct. Its commitment to transparency and accountability has significantly impacted officials, employees and community members, leading to increased community involvement and engagement and a deeper understanding of ethical obligations.

The Annual Report 2025 articulates our vision and outlines our ongoing strategic plan, highlighting our continued efforts to increase our impact and establish a legacy of ethical stewardship for future generations. This report also reflects our ongoing achievements and the milestones of our 15th anniversary.

Celebrating our anniversary provides an opportunity to acknowledge the Palm Beach County Commission on Ethics' impact and legacy of excellence, which will continue to guide future progress. Notable accomplishments and significant contributions throughout the past 15 years encompass:

- **Clear Ethical Standards:** The Commission oversees and enforces the local ethics ordinances that apply to over 10,000 public officials and employees across the county and its 39 municipalities, as well as four agencies that have voluntarily subjected themselves to the Commission's jurisdiction through interlocal agreement. These ordinances provide public officials and employees with a reliable framework for navigating complex situations, thereby reducing uncertainty, promoting responsible decision-making, and helping prevent unintentional violations.
- **Public Trust and Confidence:** The Commission enhances the public's trust in local government, by promoting transparency and integrity. Each March, the Commission leads Ethics Awareness Month, a public initiative that elevates the importance of ethical conduct in local government, encourages civic participation and reinforces the values of integrity and transparency in public service.
- **Cultural Leadership:** The Commission has consistently demonstrated a strong commitment to ethical leadership, fostering a workplace culture that promotes honesty, transparency and accountability. This ongoing engagement has increased compliance and self-reporting, reflecting a growing internal commitment to ethical conduct.
- **Supportive Oversight:** By offering clear, timely advice and objectively investigating complaints, the Commission supports a fair and balanced approach to accountability, reinforcing public trust in local government. Since 2010, the Commission has published 565 advisory opinions, helping officials and employees proactively address potential ethical concerns. Additionally, the Commission has processed over 280 complaints, ensuring thorough and impartial investigations.



EXECUTIVE SUMMARY

Fulfilling Our Mission

- **Accessible Services:** The Commission maintains an open-door policy not only for officials and employees but also for community members. It fields hundreds of questions annually from the public and provides clear, timely answers to ensure community members understand the local ethics ordinances and the standards expected of our public officials and employees. The Commission also provides guidance and resources on its website and in numerous publications.
- **Ongoing Education and Training:** Required ethics training sessions help public servants understand and comply with local ethics laws, fostering a proactive approach to ethical behavior. Over the past 15 years, the Commission has conducted more than 600 in-person training sessions, reaching thousands of elected officials, advisory board members, and employees. These trainings addressed real-world ethical scenarios, clarified legal responsibilities and reinforced the importance of integrity in public service.
- **Community Outreach and Partnerships:** The Commission actively fosters ethical awareness through impactful community outreach and the cultivation of strong partnerships with civic organizations, schools, and advocacy groups. These initiatives empower community members to engage knowledgeably with their government and help ensure ethical principles are embedded into the wider community fabric. In support of our community, the Commission has conducted over 200 outreach presentations and distributed more than 10,000 ethics guides and resource materials to the public since 2010.

Our enduring success is rooted in a shared, unified purpose that aligns our board, staff, public officials and employees and community members around ambitious yet attainable objectives. We invite our community to join us as we strive toward a future where our mission is fully realized and implemented.



COMMISSION ON ETHICS

Fostering Integrity in Public Service

The Palm Beach County Commission on Ethics reviews, interprets, renders advisory opinions and enforces the Palm Beach County Code of Ethics. This code was enacted in 2010 to provide additional and very stringent ethics standards, as authorized by §112.326, Florida Statutes.

The Code of Ethics emphasizes that public service is a matter of public trust, reminding government officials and employees to act impartially and in the best interest of the people of Palm Beach County. Officials and employees must conduct themselves in a manner that prioritizes public interest above their own personal interests and private gain.

Palm Beach County Commission on Ethics' jurisdiction extends to all county and municipal officials, employees and other persons and entities required to comply with the Code of Ethics, the Palm Beach County Lobbyist Registration Ordinance or the Palm Beach County Post-Employment Ordinance. It also has limited jurisdiction over county and municipal vendors, lobbyists who lobby the county or municipalities and the principals or employers of those lobbyists. The Commission only enforces local governmental ethics laws and does not address other laws, even those involving other ethical issues.

To meet these requirements, the Palm Beach County Commission on Ethics provides both general and specialized training on the Palm Beach County Code of Ethics to county and municipal officials and employees, vendors, lobbyists, and members of the community; offers legal advice through advisory opinions to those under its jurisdiction; investigates complaints alleging violations of the three local ethics ordinances and takes enforcement action on such violations.

MISSION

As an independent watchdog agency, the Palm Beach County Commission on Ethics is committed to upholding high ethical standards to serve the greater good and increase trust and confidence in local government. It accomplishes this by fostering integrity in public service, promoting the public's trust and confidence in that service and preventing conflicts between private interests and public duties.

The Palm Beach County Commission on Ethics fulfills its mission through ongoing educational programs, proactive community outreach and the delivery of clear and timely guidance to help individuals understand and comply with the local ethics ordinances. It also ensures the fair and impartial interpretation and enforcement of those ethics ordinances.

Guided by the principles of honesty, integrity, and character, the Commission's mission is crucial to ensuring the effective and efficient use of public resources and fostering a culture of trust, transparency and accountability within the community. These efforts make Palm Beach County a highly desirable place to live and work.



COMMISSIONERS AND STAFF



Palm Beach County Commission on Ethics Commissioners.

Back row (L-R) Peter Cruise, Kristin Vara-Garcia, Rodney Romano

Front row (L-R) Michael Kugler, Michael Kridel

The members of the Palm Beach County Commission on Ethics board governs the organization, sets ethical standards, ensures compliance, and addresses legal and ethical issues. Working with the executive director and staff, they advance the Commission's mission while promoting accountability, transparency and procedural justice.

The Commissioners meet monthly to oversee the implementation and enforcement of the three local ethics ordinances: the Code of Ethics, the Lobbyist Registration Ordinance, and the Post-Employment Ordinance. They review allegations of ethics violations to determine probable cause and provide guidance and recommendations on the policies, procedures and requirements of these ordinances.

The Palm Beach County Commission on Ethics board is composed of five volunteer members, each appointed by different community organizations to serve staggered four-year terms. The board elects a new chair and vice-chair annually. Serving as a Palm Beach County Commission on Ethics commissioner requires a strong commitment to service and exceptional qualifications. Their work is vital in promoting ethical behavior and practices in local government and the community.



Our Palm Beach County Commission on Ethics Commissioners:

Michael S. Kridel, CPA, CFF, CITP, CFC, Chair

Michael Kridel serves as chair of the Palm Beach County Commission on Ethics and has been a member since 2013. Kridel is a Certified Public Accountant and shareholder in Michael S. Kridel, C.P.A., P.A. He holds the Certified in Financial Forensics, Certified Information Technology Professional, and Certified Forensic Consultant designations, among others. Kridel has practiced public accounting for nearly 50 years and is a frequent speaker and author, garnering numerous awards at national and local conferences. He facilitated an award-winning seminar, "Ethical Decision Making in the Workplace and Society", for Broward County high schools, positively influencing more than 15,000 seniors. Kridel is also a certified ethics instructor for Florida's CPAs, an online forensic accounting course instructor for the University of North Carolina at Charlotte, and a guest instructor at Florida Atlantic University and other institutions. He is a longtime member of the Editorial Review Panels of the *Journal of Accountancy and Florida CPA Today*. Kridel has been a long-time member of the Rotary Club and is a board member for numerous not-for-profit organizations, including the Florida Board of Accountancy Education Advisory Committee. The Palm Beach Chapter of the Association of Certified Fraud Examiners appointed Kridel to the Palm Beach County Commission on Ethics.

Peter L. Cruise, Ph.D., Vice Chair

Peter Cruise serves as vice chair of the Palm Beach County Commission on Ethics and has been a member since 2018. Cruise is the Founding Director of the LeRoy Collins Public Ethics Academy and an Affiliate Associate Professor at Florida Atlantic University. His academic and professional careers have focused on improving the ethical climate in public sector programs and organizations. Previously, Cruise successfully worked in management positions in various health and human service settings. His research interests include organizational ethics, value-based management, and ethnographic approaches in human services planning and evaluation. He has presented the results of these and other research efforts at regional, national, and international academic conferences. In addition, Cruise has published his work in numerous peer-reviewed journals. Cruise is the co-editor of *Handbook of Organization Theory and Management: The Philosophical Approach*. In 2015, Cruise was selected by the College of Design and Social Inquiry faculty at Florida Atlantic University as a Distinguished Alumnus. Florida Atlantic University appointed Cruise to serve on the Palm Beach County Board of Commissioners.

Michael H. Kugler, Esquire

Michael Kugler has been a member since 2020. Kugler has a long and successful legal career as a highly respected prosecutor and personal injury attorney. He is currently a litigation attorney at GOLDLAW. Kugler is active in the community and works with public officials, businesses, and civic leaders through his participation in numerous legal and civic organizations. Kugler was appointed to the Palm Beach County Commission on Ethics by the Hispanic Bar Association of Palm Beach County, in conjunction with the F. Malcolm Cunningham, Sr. Bar Association, and the Palm Beach County Bar Association.



Rodney G. Romano, Esquire

Rodney Romano has been a Palm Beach County Commission on Ethics member since 2018. He is a member of the Florida Bar and restricts his practice to dispute resolution. He previously served as Mayor of the City of Lake Worth. Romano founded Matrix Mediation in 2006 to offer more problem-solving approaches to mediation, providing clients with greater support and compassion to understand their legal issues and help them determine the best solutions. Romano is a Florida Supreme Court Certified Circuit Civil Mediator and has conducted more than 8,500 circuit civil mediations in all areas of civil law. He is also the author of *Dispute Resolution Field Manual – Negotiating in the Trenches* and has lectured and written regularly on alternative dispute resolution issues. Romano is a member of the Florida Bar and the Palm Beach County Bar Association. The Palm Beach County League of Cities, Inc. appointed Romano to the Palm Beach County Commission on Ethics.

Kristin A. Vara-Garcia, Esquire

Kristin Vara-Garcia has served on the Palm Beach County Commission on Ethics since 2023. An experienced attorney, community volunteer, and award-nominated author, Vara-Garcia is a senior attorney for Palm Beach County School District in the Office of General Counsel. Before joining the School District, Vara-Garcia was a real estate attorney in private practice and served as an Assistant State Attorney in Florida's Fifteenth Judicial Circuit in Palm Beach County. Vara-Garcia is a Palm Beach County Bar Association member and has previously served as the co-chair/moderator of the real estate/transactional section of the Palm Beach County Bench Bar. In addition to her legal work, Vara-Garcia serves as the Vice President of the Guild of Catholic Lawyers of the Diocese of Palm Beach and is a volunteer for GTS Husky Rescue. Vara-Garcia was appointed to the Palm Beach County Commission on Ethics by the Palm Beach County Association of Chiefs of Police.



Working closely with the Commissioners, the Palm Beach County Commission on Ethics staff is the unifying force that drives and propels the Commission's success. Trust and respect are key to a strong team that delivers consistent results. This statement describes the Palm Beach County Commission on Ethics staff, who work diligently as a cohesive, unbeatable team to achieve organizational goals. They also demonstrate and uphold the Commission's values, foster good relationships in the community, and actively support the mission of the Palm Beach County Commission on Ethics in a constructive and impactful manner.



*Palm Beach County Commission on Ethics Staff.
Back row (L-R) Mark Higgs, Christie Kelley, Rhonda Giger
Front row (L-R) Gina Levesque, Abigail Irizarry, Lizabeth Martin*

Our Palm Beach County Commission on Ethics staff:

Christie Kelley, Esquire, Executive Director

Christie Kelley has served as Executive Director of the Palm Beach County Commission on Ethics since 2022. In this role, she is responsible for developing and overseeing the Commission's Strategic Plan, as well as the Commission's legal, educational, enforcement, and administrative areas. She also provides legal counsel to the Palm Beach County Commission on Ethics and other individuals and entities under the Commission's jurisdiction. Before becoming the Executive Director, Kelley served as the General Counsel for the Palm Beach County Commission on Ethics for eight years. Previously, Kelley served as an Assistant State Attorney in Florida's Fifth Judicial Circuit in Marion County and as an Assistant Director in the Center for Career Development at the University of Florida Levin College of Law. Kelley is a member of the Florida Bar and an active community volunteer. Kelley earned a B.A. in Business Administration (summa cum laude) from the University of Florida and a J.D. from the University of Florida Levin College of Law (cum laude).



Rhonda Giger, Esquire, General Counsel

Rhonda Giger has served as General Counsel of the Palm Beach County Commission on Ethics since 2022, leading the Legal Affairs section. With 25 years of legal experience, she worked as the first in-house prosecutor and police legal advisor for the City of Bothell, Washington, and later as an Assistant Attorney in the Capital Appellate Unit of the Florida Attorney General's Office. At the Commission, Giger provides legal services on matters involving the Code of Ethics, the Lobbyist Registration Ordinance, and the Post-Employment Ordinance, and presents legal analyses for determining complaint sufficiency and probable cause. Additionally, Giger provides ethics training and workshops throughout the county that are tailored to help public officials and employees develop skills for addressing multifaceted ethical issues. She earned a B.A. in Law and Justice from Central Washington University and a J.D. (cum laude) from Seattle University School of Law.

Gina Levesque, Intake & Compliance Manager

Gina Levesque has been a Palm Beach County Commission on Ethics staff member since its inception in 2010. With over 25 years of experience in the legal and law enforcement fields, she oversees the daily operations of the Intake & Compliance section, including governance functions, reviewing compliance matters, and providing general guidance on ethical standards to public officials and employees and the public. Levesque also tracks effectiveness, efficiency, and service quality while supporting the Commission's initiatives and outreach efforts. Before joining the Commission, she worked as a law enforcement and correctional officer in Broward County and as a legal assistant in the Palm Beach County State Attorney's Office Homicide Division. Levesque earned a B.S. in Education from Southern Illinois University at Edwardsville and an MPA from Nova Southeastern University. She is a Certified Fraud Examiner and a member of the Florida Region 7 All Hazards Incident Management Team.

S. Lizabeth Martin, Communications & Education Manager

Lizabeth Martin has served as Communications and Education Manager of the Palm Beach County Commission on Ethics since 2023. With more than 20 years of experience in communications, marketing, and journalism, she manages the Commission's community outreach education programs, marketing projects, and public communications, and represents the agency at community and educational events. Working in alignment with the Commission's Strategic Plan, Martin also leads efforts to increase public visibility and awareness of the Commission's mission. Before joining the Commission, she was a tenured professor at Palm Beach State College for 11 years. Earlier in her career, she held positions at the University of North Florida, Flagler College, Duval County Schools, The Florida Times-Union, and WJCT Public Broadcasting. Martin earned a B.A. in Communications from Florida State University and an M.A. in Communications from the University of West Florida.



Abigail Irizarry, Investigator

Abigail Irizarry joined the Palm Beach County Commission on Ethics staff in 2016 after serving nine years as a respected and award-winning investigator for the State of Florida. As an investigator for the Commission, Irizarry conducts confidential and time-sensitive investigations focused on alleged ethics violations. She also serves as a department liaison with law enforcement agencies and other institutions to foster investigation collaboration. Her previous experience includes a variety of investigative capacities, first for the Better Business Bureau and then becoming the lead investigator for the Florida Department of Children and Families in Lee County, where she specialized in human trafficking cases and other serious crimes. In 2015, Irizarry was named the Department of Children and Families Office of Inspector General's Investigative Star of the Year for her achievements. She was the first female investigator in the state to receive this prestigious award and honor. Irizarry graduated from Florida State University with a B.S. in Criminology and holds certifications as a Certified Inspector General Investigator, Fraud Examiner and Forensic Interviewer.

Mark Higgs, Investigator

Mark Higgs has been an investigator with the Palm Beach County Commission on Ethics since 2019. He conducts confidential and time-sensitive investigations into alleged ethics violations and acts as a liaison with law enforcement agencies and other institutions to foster investigative collaboration. Higgs joined the Commission after a 30-year career with the Chicago Police Department, where he held supervisory roles in counterterrorism, intelligence, and internal affairs, and served on the FBI's Joint Terrorism Task Force. He has also obtained specialized training through the Department of Homeland Security, the Bureau of Justice Assistance, the Office of the Director of National Intelligence, and the FBI. Higgs is a Certified Fraud Examiner and Certified Forensic Interviewer and holds a B.S. in Law Enforcement Management and an M.S. in Public Safety Administration from Calumet College of St. Joseph.

FISCAL REPORT

Under the Commission on Ethics Ordinance §2-259, Palm Beach County provides financial support to the Palm Beach County Commission on Ethics, with funds allocated from the county's general fund account. As good stewards of public funds, the Palm Beach County Commission on Ethics board and staff exercise prudence and integrity in managing public funds and resources, ensuring efficient and effective operations.

The Commission's operating budget for the fiscal year 2025 was \$1,025,491. Additional budget details can be obtained from the Palm Beach County Office of Financial Management and Budget at www.pbc.gov/ofmb.



STRATEGIC PLAN 2022–2027

Roadmap to Success

In 2025, the Palm Beach County Commission on Ethics had another successful year, advancing its ambitious five-year strategic plan. Below is a brief overview of key achievements and notable progress on the plan's five strategic priorities.

Goal 1: Provide Exceptional Service Delivery

Objective: To manage Palm Beach County Commission on Ethics operations, priorities, and evaluation of programs, services, and projects.

The Palm Beach County Commission on Ethics continues to promote and uphold a culture of ethics and accountability, as mandated by the Palm Beach County Code of Ethics. Last year, a strong focus on operations and customer service continued, with all efforts directed toward delivering exceptional service.

In 2025, the Palm Beach County Commission on Ethics reviewed its continuous improvement process in service delivery. It identified and revised processes and checklists to streamline inquiry and complaint procedures, continued tracking 28 organization-wide performance metrics, created and incorporated new methods to raise awareness of our mission, assessed the new state ethics bill for its impact on standard operating procedures, and initiated revisions to the ordinance to reflect changes from recent legislation.

The Palm Beach County Commission on Ethics continues to engage with legislators to encourage and support ethics legislation that addresses and benefits the needs of local government and the community. The Palm Beach County Commission on Ethics has collaborated with other state-wide ethics agencies to coordinate efforts to educate elected leaders on ethics policies, standards, and benefits.

Goal 2: Maintain and Motivate A Highly Skilled Agile Team

Objective: To ensure a workplace environment that welcomes and supports Palm Beach County Commission on Ethics employee engagement and development.

Personnel development, job descriptions, and staffing are continuously reviewed and updated annually to ensure employee motivation, engagement, and well-being. Employees are dedicated and firmly committed to the Palm Beach County Commission on Ethics' mission and core values, reflected in their numerous accolades and accomplishments.



Goal 3: Overhaul and Improve Commission Website

Objective: To engage and inspire individuals to support the Palm Beach County Commission on Ethics mission.

A comprehensive website redesign in collaboration with county personnel is underway. It involves significant content, structure, and visual changes that will serve and improve user experience and our educational and marketing capabilities—estimated to debut in the latter half of 2026.

Goal 4: Enhance Comprehensive Education Program

Objective: To deliver Palm Beach County Commission on Ethics training that is effective, efficient, and accessible.

Educational training, activities, marketing and communication campaigns foster a culture of ethics in government service and promote a county-wide ethical culture. Over the past year, the Education and Communication section expanded its programming, increasing capacity to address demand for community programs and services. Multiple new marketing initiatives, social media awareness campaigns and training programs and materials were developed to address education objectives.

Goal 5: Organization and Community Partnerships

Objective: To foster community outreach and partnerships to strengthen the Palm Beach County Commission on Ethics' presence and services.

In 2024, the Palm Beach County Commission on Ethics developed a marketing and outreach plan to guide and track community engagement efforts. The plan's goals were actively implemented in 2025, including building relationships, increasing awareness and delivery of Commission programs and supporting our mission through events and social media content.



CUSTOMER SATISFACTION

Meeting Expectations

Delivering outstanding customer service and satisfaction is a priority for the Palm Beach County Commission on Ethics. The organization values feedback from its internal and external customers and currently utilizes a Customer Satisfaction Survey to gain deeper insight into the needs of its internal customers. This instrument enables the Commission to assess whether it effectively meets the expectations and requirements of those it serves.

By engaging in our programs and providing valuable feedback, customers not only enhance their understanding of ethical practices but also play a crucial role in influencing the direction of our initiatives. Their input helps us refine our services, ensuring that Commission programming and other offerings remain relevant and impactful. This collaborative approach is central to our strategic plan, enabling us to cultivate a loyal and committed customer base that genuinely values the importance of ethical conduct.

When our customers are satisfied with the resources and support we provide, they become enthusiastic advocates for our mission, sharing the significance of ethics in government service with their peers and the wider community. Ultimately, empowering our customers in this way strengthens the foundation of an ethical culture throughout Palm Beach County and contributes to the overall well-being of our community.



Rhonda Giger at ethics training.

CUSTOMER SATISFACTION SURVEY

Measuring customer satisfaction is essential for monitoring our efforts, ensuring we are headed in the right direction, and providing effective programs and services. The commissioners and staff of the Palm Beach County Commission on Ethics are committed to providing high-quality customer service and education programming, and we will continue to focus on delivering exceptional service in the years ahead.

The Palm Beach County Commission on Ethics Customer Satisfaction Survey includes five rating questions and one open-ended question for feedback. Responses are reviewed in real time, enabling quick action on concerns. The results also provide possible information and data for new performance indicators.



Rhonda Giger presenting ethics training to City of Lake Park employees.



Town of Jupiter employees asking Rhonda Giger questions during an ethics training.

The surveys allow us to identify trends, highlight areas where additional support may be needed, and pinpoint opportunities for improvement that may not emerge through informal feedback alone.

Since its inception in 2022, 1,694 customers voluntarily completed our surveys regarding our work and programs. The surveys revealed that our customers remain satisfied with our performance, find the training beneficial, and consider our mission crucial to the community.

CUSTOMER SATISFACTION: FEEDBACK

“I think the in-person meeting was super beneficial. Meet with more businesses and boards to increase awareness.”

– Delray Beach DDA employee

“The instructor was very engaging; she always has fresh material that makes you think.”

– City of Greenacres employee

“It is always a reaffirming presentation for employee conduct.”

– City of Palm Beach Gardens employee

“Looking forward to future classes. This was important instruction.”

– Town of Lake Clarke Shores employee

“It was good to include lots of examples! Good explanations too!”

– City of Palm Beach Gardens employee

“The content and presentation were engaging and helpful.”

– City of Palm Beach Gardens employee

“Very interactive and understandable.”

– City of Lake Worth Beach employee

“In-person training was extremely helpful.”

– Delray Beach DDA employee

CUSTOMER SATISFACTION: BY THE NUMBERS

99.8%

reported they are satisfied or very satisfied with the Palm Beach County Commission on Ethics programming.

99.6%

found the Palm Beach County Commission on Ethics training program helpful in understanding how to incorporate the Code of Ethics into their work.

98.9%

believe ethical instruction, knowledge, and practices are essential for community well-being.

94.8%

felt more confident in their abilities to serve the public, coworkers, and employers with honesty, integrity, and character after participating in the Palm Beach County Commission on Ethics program.

86.3%

reported they had previously heard about the Palm Beach County Commission on Ethics and its mission.



2025 ACHIEVEMENTS

Accomplishing our Goals

Administrative

- New Chair and Vice-Chair appointed
- 12** Commission meetings held
- 15** Training Policy Compliance Reviews completed

Education and Outreach

- 20** Outreach events attended
- 43** County/Municipal/Agency meetings attended



Legal Affairs

- 48** Guidance requests received
- 11** Advisory Opinions issued
- 46** Ethics Trainings conducted

Enforcement

- 55** Pre-Inquiry Reviews completed
- 20** Complaints investigated
- 1,182** Gift Forms reviewed



Christie Kelley at an outreach event.

Aligned with our Strategic Plan 2022-2027, we continually seek to enhance our services and increase awareness of our mission. Reviewing our operational processes enabled us to develop and meet our targeted performance metrics, thereby optimizing outcomes and achieving key successes in 2025. We also identified areas for improvement and implemented new initiatives tailored to specific needs, resulting in increased customer satisfaction and broader community impact. Furthermore, our commitment to clear, consistent communication has strengthened our relationships with stakeholders, while our focus on measurable performance goals has enhanced efficiency and quality.

As a trusted and independent resource for Palm Beach County, the Commission on Ethics elevated its impact in 2025 by refining operational processes, enhancing education and outreach, and maintaining rigorous oversight of advisory and enforcement activities.

Highlighting achievements in our Administrative, Education and Outreach, Legal Affairs, and Enforcement areas best demonstrates our ongoing commitment to success.



ADMINISTRATIVE

Laying the Foundation for 15 Years of Integrity

As the Commission marks its 15th year of service, the Administrative area continues to provide the steady foundation on which all progress is made. From organizing Commission meetings to overseeing compliance reviews and supporting staff development, this area ensures the office's seamless functioning. Its work extends beyond daily operations by driving the goals of the Strategic Plan, cultivating a culture of accountability, and positioning the Commission to remain a trusted and responsive institution well into the future. The highlights of 2025 efforts are listed below.

- Conducted **12** Palm Beach County Commission on Ethics meetings.
- Michael S. Kridel was selected as chair.
- Peter L. Cruise was selected as vice chair.
- Conducted **15** Training Policy Compliance Reviews, supporting public employers in meeting their ethics training obligations.
- Staff attended the annual COGEL Conference, sharing best practices, fostering innovation through engagement with other agencies, and identifying potential gaps or opportunities to improve Commission processes and policies.
- Continued implementation of the Strategic Plan 2022–2027, focusing on process performance and customer service enhancements.
- Advanced employee development initiatives, with staff completing over **150** professional development hours to expand skills and foster innovation.
- Continued monitoring and reviewing office policies, manuals, and forms to maintain consistency, cross-training opportunities, and efficiency.
- Managed over **650** phone or email inquiries, using these interactions to educate the public about the Commission on Ethics and the Palm Beach County Code of Ethics.
- Reviewed **600** customer satisfaction surveys to continue evaluation of training effectiveness.



Christie Kelley and Gina Levesque at the National High School Ethics Bowl Regional competition.



Commissioner Peter Cruise, Christie Kelley, and Kristin Vara-Garcia at the National High School Ethics Bowl Regional competition.



EDUCATION AND OUTREACH

Strengthening Public Trust

Celebrating 15 years of advancing ethics awareness, the Commission's Education and Outreach area continues to make a lasting impact across Palm Beach County. By delivering engaging training, hosting community outreach events, and maintaining a strong digital presence, the Commission helps officials, employees, and community members understand and embrace their ethical responsibilities.

Direct engagement and outreach with local organizations ensures that the message of integrity reaches every corner of the county, and provides an opportunity for them to learn more about the Commission and its work.

The 2025 statistics and scope of these initiatives are captured in the list below.

- Conducted **20** outreach events for community groups and organizations.
- Celebrated our 15th anniversary with a bus wrap on a Palm Tran bus to reach a wider audience and promote ethical excellence in Palm Beach County.
- Assisted PBC TV Channel 20 with creating and promoting the Palm Beach County Commission's 15th Anniversary Program on the importance of ethics in local government.
- Revised and distributed the Pocket Guide to Ethics booklet for officials, employees, and community members.



Commissioner Peter Cruise and Christie Kelley giving an ethics overview to Leadership Palm Beach County's Leadership Engage Class of 2026.



The Palm Tran bus with the Commission's 15th Anniversary wrap was spotted at a bus stop.



Lizabeth Martin at an ethics awareness outreach event at the Palm Beach County Governmental Center.

- Attended at least one commission meeting of the board of county commissioners, the **39** municipalities within Palm Beach County, and the four agencies that are voluntarily under the Commission's jurisdiction, ensuring visibility and accessibility across Palm Beach County.
- Participated as moderators and judges in the National High School Ethics Bowl Regional competition sponsored by Florida Atlantic University.
- Updated and enhanced publications and outreach materials to sustain engagement and increase awareness of the Commission's mission.
- Published **three** newsletters, highlighting educational resources and initiatives.

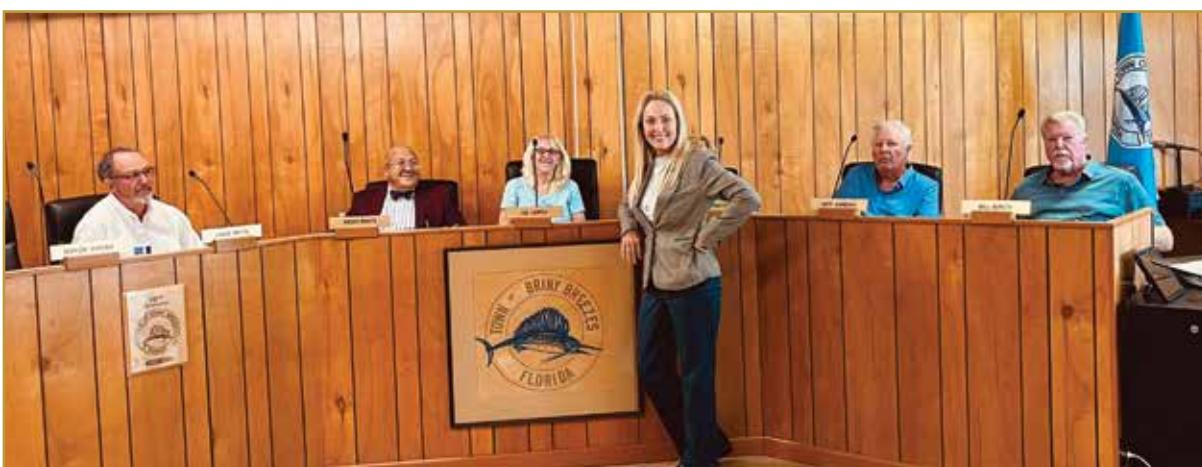
- Utilized new marketing initiatives, social media awareness campaigns, and materials to broaden outreach efforts and enhance public engagement.
- Initiated the redesign process for our website to enhance user experience and functionality.
- Received **31,027** page views of the Palm Beach County Commission on Ethics website, which remains a valuable educational resource.



Lizabeth Martin participating in an outreach event at the City of Palm Beach Gardens Vendors Fair.



EDUCATION AND OUTREACH





EDUCATION AND OUTREACH





LEGAL AFFAIRS

Guiding with Clarity: Preventing Ethical Missteps

Over the past 15 years, the Legal Affairs area has been a trusted guide for public officials and employees facing ethical questions. In 2025, this legacy continues through timely, easy-to-understand advisory opinions that offer clarity, ensure compliance, and reinforce the *Ask First, Act Later* motto.

Each advisory opinion issued helps identify and prevent potential conflicts and also contributes to a broader culture of transparency and accountability in Palm Beach County. When faced with a possible ethical dilemma, local public officials and employees are encouraged to follow the *Ask First, Act Later* motto.

The achievements of this vital function are summarized below.

- Delivered **46** in-person ethics training sessions to public officials and employees, providing practical guidance on applying the Palm Beach County Code of Ethics in real-world situations.
- Issued **11** new advisory opinions, providing clear interpretations of the Palm Beach County Code of Ethics and related ordinances.
- Maintained efficiency by completing advisory opinions in an average of **6** days.
- Managed **48** requests for guidance by providing referrals to existing advisory opinions.





LEGAL AFFAIRS





ENFORCEMENT

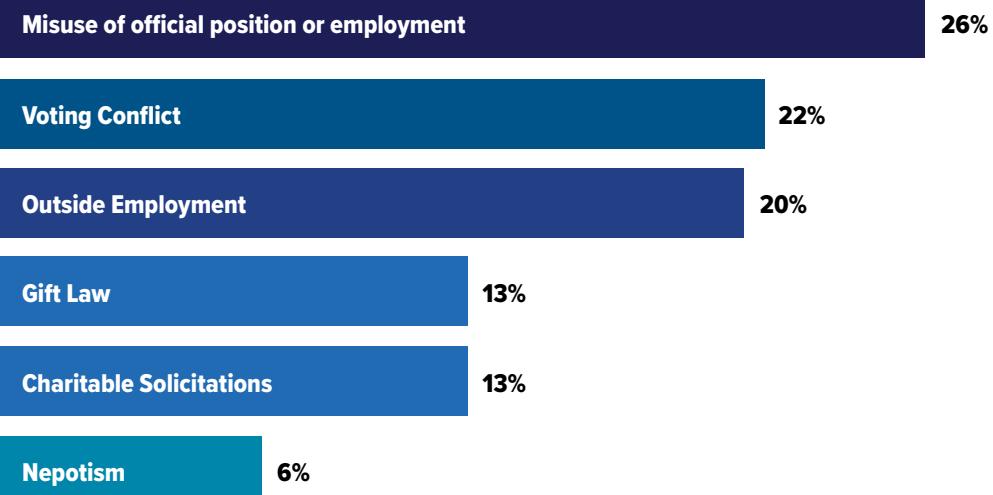
Safeguarding Integrity Through Fair and Impartial Oversight

For 15 years, the Commission's Enforcement area has upheld the highest standards of integrity by ensuring that the local ethics laws are applied fairly and consistently. Through reviews, inquiries, and investigations, the Commission has consistently demonstrated its commitment to impartiality and professionalism, safeguarding public trust and confidence. These enforcement activities address individual cases and reinforce a culture of accountability that resonates throughout county and municipal government. The 2025 results of this work are outlined below.

- Completed **55** pre-inquiry reviews into concerns reported by the public.
- Initiated **one** inquiry, which was closed due to a lack of legal sufficiency.
- Investigated **20** sworn complaints.
 - **10** were administratively dismissed for lack of legal sufficiency.
 - **5** were dismissed with a finding of no probable cause.
 - **2** were resolved by a Letter of Instruction being issued.
 - **2** remain ongoing.
 - **1** was resolved by a Letter of Reprimand being issued.
- Reviewed and processed **1,182** gift disclosure forms submitted by public officials and employees.
- Reviewed and processed **46** voting conflict forms submitted by public officials.
- Maintained a focus on efficiency, impartiality, and professionalism in all enforcement actions.
- Average number of days to complete routine inquiries: **63**.
- Average number of days to complete routine investigations: **30**.
- Average number of days to complete complex investigations: **113**.



2025 Advisory Opinions by Topic



2025 Inquiries and Complaints by Topic





CELEBRATING 15 YEARS

Championing Ethics and Transforming Public Service

The Palm Beach County Commission on Ethics celebrated a remarkable milestone in 2025 — the 15th anniversary of its creation. Fifteen years ago, the voters of Palm Beach County made a bold and decisive decision to establish an independent watchdog agency dedicated to upholding the principles of transparency, integrity, and accountability in local government. This mission remains as vital and profound today as it was 15 years ago.

Over the last 15 years, the Palm Beach County Commission on Ethics has achieved notable accomplishments, as outlined below. These efforts demonstrate the organization's ongoing commitment to progress and transformation.

- Successfully administered and enforced the three local ethics ordinances that apply to over **10,000** public officials and employees across the county and its **39** municipalities, as well as four agencies that have voluntarily subjected themselves to the Commission's jurisdiction through interlocal agreement.
- Delivered more than **600** in-person, customized training sessions, educating thousands of elected officials, advisory board members, and employees on real-world ethical scenarios, their obligations under the Code of Ethics, and the critical role of integrity in public service.
- Received approximately **12,000** requests for assistance.
- Published **565** advisory opinions to assist individuals in proactively addressing potential ethical issues.
- Processed over **280** complaints, ensuring comprehensive, objective and impartial investigations.
- Reviewed and processed over **6,500** gift forms submitted by public officials and employees.
- Reviewed and processed over **1,500** voting conflicts submitted by public officials.
- Conducted over **200** outreach presentations and distributed upwards of **10,000** ethical guides and resource materials to members of the public.
- Participated annually as moderators and judges in the National High School Ethics Bowl Regional Competition sponsored by Florida Atlantic University.
- Hosted the annual Ethics Awareness Month, highlighting the importance of ethical conduct within local government, fostering civic engagement, and reinforcing standards of integrity and transparency.
- Cultivated relationships with civic organizations, schools, and advocacy groups to further embed ethical principles within the broader community.
- Addressed hundreds of public inquiries each year, providing clear, timely responses to ensure residents understand local ethics ordinances and the standards expected of public officials and employees.
- Received over **one million** website views.
- Offered ongoing guidance and resources through a dedicated website and published materials.

ETHICS MATTER

Michael Kridel
Chair
Commission on Ethics

"Our mission is to guide, educate, and hold local officials and public employees accountable, building lasting trust between our leaders and the communities they serve. We are deeply committed to maintaining the highest ethical standards, in all our actions. I am truly honored by the impactful 15-year legacy we have all built together."



GUARDIANS OF ETHICS OVER THE YEARS

Past Commission on Ethics Leadership



2010



2013



2015



2018



2021



2022



2023-PRESENT



ADVANCING OUR MISSION

Creating and Strengthening a Lasting Impact

By identifying and preventing ethical conflicts of interest, the Palm Beach County Commission on Ethics plays a vital role in helping public officials, employees and community members to make sound decisions and navigate complex challenges with integrity.

The Palm Beach County Commission on Ethics has successfully collaborated with the community over the past 15 years to promote ethical standards, transparent decision-making and responsible operations. The Commission is dedicated to delivering services, promoting operational efficiency, enhancing employee well-being, providing education, fostering community outreach and maintaining a customer-focused approach to promote ethics in Palm Beach County.

The collective dedication of our community—public officials, employees, and community members alike—remains central to the success of our efforts. Our vision is a future where ethical conduct and stewardship are embedded across all aspects of the community we serve.

The Palm Beach County Commission on Ethics will continue to advance its mission and uphold the standards set by voters in 2010. We look forward to celebrating many more anniversaries with you.



Commission on Ethics leadership and staff.



LET'S CONNECT

A variety of resources and services are available for those interested in learning more about the Palm Beach County Commission on Ethics. Individuals and organizations may request a speaker to address ethical topics and issues relevant to public service.

The Commission also provides guidance through advisory opinions that can clarify ethical considerations in specific situations. In addition, detailed procedures are outlined for submitting complaints regarding potential ethics violations. Information and forms related to gift disclosures are also accessible, ensuring transparency and accountability in interactions with public officials.

To learn more about the Commission's offerings, visit:

www.palmbeachcountyethics.com.

Like and follow us on social media:

@pbccoe





APPENDIX

Palm Beach County Code of Ethics



CODE OF ETHICS

Effective Date: July 1, 2021

Sec. 2-441. Title; statement of purpose.

This article shall be known as the Palm Beach County Code of Ethics. This code of ethics is enacted pursuant to Florida Constitution, Article VIII, section 1(g), Florida Statutes, Ch. 125, and the Charter of Palm Beach County. The Municipalities located within Palm Beach County are subject to the provisions of this code of ethics pursuant to referendum. The purpose of this code is to provide additional and more stringent ethics standards as authorized by Florida Statutes, §112.326. This code shall not be construed to authorize or permit any conduct or activity that is in violation of Florida Statutes, Ch. 112, pt. III. This code of ethics shall be deemed additional and supplemental to any and all state and federal laws governing ethical conduct of officials and employees, as well as all local laws, rules, regulations and policies.

Officials and employees in the public service shall be conscious that public service is a public trust, shall be impartial and devoted to the best interests of the people of Palm Beach County, and shall act and conduct themselves so as not to give occasion for distrust of their impartiality.

Nothing herein shall abridge employees' constitutional right to collective bargaining.

(Ord. No. 2011-011, §1(Exh. 1), 5-17-11)

Sec. 2-442. Definitions.

The following words, terms, and phrases, when used in this article, shall have the meanings ascribed to them in this section, except where the context clearly indicates a different meaning, or where expressly provided herein to the contrary:

Advisory board shall mean any advisory or quasi-judicial board created by the board of county commissioners, by the local municipal governing bodies, or by the mayors who serve as chief executive officers or by mayors who are not members of local municipal governing bodies.

Customer or client means any person or entity to which an official or employee's outside employer or business has supplied goods or services during the previous twenty-four (24) months, having, in the aggregate, a value greater than ten thousand dollars (\$10,000).

Domestic partner is an adult, unrelated by blood, with whom an unmarried or separated official or employee has an exclusive committed relationship and maintains a mutual residence.

Financial benefit includes any money, service, license, permit, contract, authorization, loan, travel, entertainment, hospitality, gratuity, or any promise of any of these, or anything else of value. This term does not include campaign contributions authorized by law.

Gift shall refer to the transfer of anything of economic value, whether in the form of money, service, loan, travel, entertainment, hospitality, item or promise of these, or in any other form, without adequate and lawful consideration. Food and beverages consumed at a single setting or a meal shall be considered a single gift, and the value of the food and beverage provided at that sitting or meal shall be considered the value of the gift. In determining the value of the gift, the recipient of the gift may consult, among other sources, Florida Statutes, §112.3148, and the Florida Administrative Code as may be amended.

Household member includes anyone whose primary residence is in the official or employee's home, including non-relatives who are not renters or employees of the head of the household.

Inspector general shall mean the office established in article XII of this chapter.

Lobbying shall mean seeking to influence a decision through oral or written communication or an attempt to obtain the goodwill of any county commissioner, any member of a local municipal governing body, any mayor or chief executive officer that is not a member of a local municipal governing body, any advisory board member, or any employee with respect to the passage, defeat or modification of any item which may foreseeably be presented for consideration to the advisory board, the board of county commissioners, or the local municipal governing body lobbied as applicable.



Lobbyist shall mean any person who is employed and receives payment, or who contracts for economic consideration, or who registers in the county's central lobbyist registration database or with any municipality, 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.

"Lobbyist" shall not include:

1. Any employee, contract employee, or independent contractor of a governmental agency or entity lobbying on behalf of that agency or entity, any elected local official when the official is lobbying on behalf of the governmental agency or entity which the official serves, or any member of the official's staff when such staff member is lobbying on an occasional basis on behalf of the governmental agency or entity by which the staff member is employed.
2. Any person who is retained or employed for the purpose of representing an employer, principal or client only during a publicly noticed quasi-judicial hearing or comprehensive plan hearing, provided the person identifies the employer, principal or client at the hearing, and providing that the person is not otherwise registered as a lobbyist in the county's central lobbyist registration database, or with any municipal lobbyist registration system when that municipality has its own lobbyist registration process.
3. Any expert witness who is retained or employed by an employer, principal or client to provide only scientific, technical or other specialized information provided in agenda materials or testimony only in public hearings, so long as the expert identifies the employer, principal or client at the hearing.
4. Any person who lobbies only in his or her individual capacity for the purpose of self-representation and without compensation.
5. Any employee, contract employee, or independent contractor of the Palm Beach County League of Cities, Inc., lobbying on behalf of that entity.

Official or employee means any official or employee of the county or the municipalities located within the county, whether paid or unpaid. The term "employee" includes but is not limited to all managers, department heads, and personnel of the county or the municipalities located within the county. The term also includes volunteers of the county or the municipalities located within the county when such volunteers exercise discretionary police, fire, or parking enforcement department authority. The term "employee" also includes the chief executive officer of the county or any municipality, who is not part of the local governing body. If the county or municipality utilizes and contracts for "privatized" chief administrative officers or chief executive officers, then the person providing such services, or the officers, directors, and employees of any entity providing such services, shall be considered the employees of the county or municipality that he or she serves. However, it shall not include local government attorneys as defined in Florida Statutes § 112.313, or attorneys who render contracted services to the county or municipality that are limited in scope to a specific issue or subject, to specific litigation, or to a specific administrative proceeding. The term "official" shall mean members of the board of county commissioners, a mayor, members of local municipal governing bodies, and members appointed by the board of county commissioners, members of local municipal governing bodies or mayors or chief executive officers that are not members of local municipal governing body, as applicable, to serve on any advisory, quasi-judicial, or any other board of the county, state, or any other regional, local, municipal, or corporate entity.

Outside employer or business includes:

1. Any entity, other than the county, the state, or any other federal, regional, local, or municipal government entity, of which the official or employee is a member, official, director, proprietor, partner, or employee, and from which he or she receives compensation for services rendered or goods sold or produced. For purposes of this definition, "compensation" does not include reimbursement for necessary expenses, including travel expenses; or
2. Any entity located in the county or which does business with or is regulated by the county or municipality as applicable, in which the official or employee has an ownership interest. For purposes of this definition, an "ownership interest" shall mean at least five (5) percent of the total assets or common stock owned by the official or employee or any combination of the official or employee's household members, spouse, child, step-child, brother, sister, parent or step-parent, or a person claimed as a dependent on the official or employee's latest individual federal tax return.
3. The term outside employer or business shall not apply to an employee who is employed by a certified bargaining agent solely to represent employees.



Palm Beach County Commission on Ethics means the commission established in section 2-254 et seq. to administer and enforce the ethics regulations set forth herein, and may also be referred to as the "commission on ethics" in this article.

Persons and entities shall be defined to include all natural persons, firms, associations, joint ventures, partnerships, estates, trusts, business entities, syndicates, fiduciaries, corporations, and all other organizations.

Principal shall mean the person or entity a lobbyist represents, including a lobbyist's employer, for the purpose of lobbying.

Relative unless otherwise specified in this article, means an individual who is related to an official or employee as father, mother, son, daughter, brother, sister, uncle, aunt, first cousin, nephew, niece, husband, wife, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half-brother, half-sister, grandparent, great grandparent, grandchild, great grandchild, step grandparent, step great grandparent, step grandchild, step great grandchild, person who is engaged to be married to the official or employee or who otherwise holds himself or herself out as or is generally known as the person whom the official or employee intends to marry or with whom the official or employee intends to form a household, or any other natural person having the same legal residence as the official or employee.

Transaction shall refer to the purchase or sale by the county or municipality of goods or services for a consideration.

Vendor means any person or entity who has a pending bid proposal, an offer or request to sell goods or services or to sell or lease real or personal property, or who currently sells goods or services, or sells or leases real or personal property to the county or municipality involved in the subject contract or transaction as applicable. For the purposes of this definition, a vendor entity includes an owner, director, manager or employee. Currently sells goods or services shall mean the period of time of an actual transaction or contract between a vendor and the government entity if such transaction or contract exceeds \$500. Where no formal contract exists for the sale or lease of goods and services, it shall include the period of time from the point the government entity orders or otherwise agrees to purchase goods and services from a vendor, to the point that all obligations on the part of both the vendor and the government entity have been satisfied by delivery of the goods and/or services by the vendor, and payment has been received for those goods and services by the vendor, and where no other obligations by either party concerning the purchase of the goods and/or services remain unsatisfied. However, it shall not include any warranty period provided by the vendor once payment for the goods and services has been received and the goods and services have been delivered, even where an obligation to provide warranty service on the part of the vendor shall exist.

(Ord. No. 2011-011, §1(Exh. 1), 5-17-11, 4-6-21)

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." The 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).

D. **Contractual relationships.** No official or employee shall enter into any contract or other transaction for goods or services with his or her respective county or municipality. This prohibition extends to all contracts or transactions between the county or municipality as applicable or any person, agency or entity acting for the county or municipality as applicable, and the official or employee, directly or indirectly, or the official or employee's outside employer or business. Any such contract, agreement, or business arrangement entered into in violation of this subsection may be rescinded or declared void by the board of county commissioners pursuant to section 2-448(c) or by the local municipal governing body pursuant to local ordinance as applicable. This prohibition shall not apply to employees who enter into contracts with Palm Beach County or a municipality as part of their official duties with the county or that municipality. This prohibition also shall not apply to officials or employees who purchase goods from the county or municipality on the same terms available to all members of the public. This prohibition shall also not apply to advisory board members provided the subject contract or transaction is disclosed at a duly noticed public meeting of the governing body and the advisory board member's board provides no regulation, oversight, management, or policy-setting recommendations regarding the subject contract or transaction.

E. **Exceptions and waiver.** The requirements of subsection (d) above may be waived as it pertains to advisory board members where the advisory board member's board is purely advisory and provides regulation, oversight, management, or policy-setting recommendations regarding the subject contract or transaction. No waiver shall be allowed where the advisory board member's board is not purely advisory and provides regulation, oversight, management, or policy-setting recommendations regarding the subject contract or transaction. Waiver may be effected by the board of county commissioners or by the local municipal governing body as applicable upon full disclosure of the contract or transaction prior to the waiver and an affirmative vote of a majority plus one (1) of the total membership of the board of county commissioners or the local municipal governing body as applicable. In instances in which appointment to the advisory board is made by an individual, waiver may be effected, after full disclosure of the contract or transaction at a public hearing, by the appointing person. In addition, no



official or employee shall be held in violation of subsection (d) if:

1. The business is awarded under a system of sealed, competitive bidding to the lowest bidder and:
 - a. The official or employee, or his or her relative or household member, has in no way participated in the determination of the bid specifications or the determination of the lowest bidder;
 - b. The official or employee, or his or her relative or household member, has in no way used or attempted to use the official or employee's influence to persuade the agency, governmental entity or any personnel thereof to enter such a contract other than by the mere submission of the bid; and
 - c. The official or employee, prior to or at the time of the submission of the bid, has filed a statement with the supervisor of elections and the commission on ethics, disclosing the nature of the interest in the outside employer or business submitting the bid.
2. An emergency purchase or contract, which would otherwise violate a provision of subsection (d), must be made in order to protect the health, safety, or welfare of the citizens of the county or municipality as applicable.
3. The outside employer or business involved is the only source of supply within the county or municipality under applicable law or county or municipal policy, and there is full disclosure by the official or employee of his or her interest in the outside employer or business to the county or municipality as applicable and the ethics commission prior to the purchase, rental, sale, leasing, or other business being transacted.
4. The total amount of the contracts or transactions in the aggregate between the outside employer or business and the county or municipality as applicable does not exceed five hundred dollars (\$500) per calendar year.
5. Notwithstanding any provision to the contrary, subsection (d) shall not be construed to prevent an employee from seeking part-time employment with an outside employer who has entered into a contract for goods or services with the county or municipality as applicable provided that:
 - a. The employee or his or her spouse, domestic partner, household member, or relative does not work in the county or municipal department as applicable which will enforce, oversee or administer the subject contract; and
 - b. The outside employment would not interfere with or otherwise impair his or her independence of judgment or otherwise interfere with the full and faithful performance of his or her public duties to the county or municipality as applicable; and
 - c. The employee or his or her spouse, domestic partner, household member, or relative has not participated in determining the subject contract requirements or awarding the contract; and
 - d. The employee's job responsibilities and job description will not require him or her to be involved in the outside employer's contract in any way including, but not limited to, its enforcement, oversight, administration, amendment, extension, termination or forbearance; and
 - e. The employee demonstrates compliance with applicable county or municipal policy regarding outside employment and obtains written permission from his or her supervisor; and
 - f. The employee has obtained a conflict of interest waiver signed by the chief administrative officer, or his or her designee, and the employee's direct supervisor, or his or her designee, based on a finding that no conflict exists. The employee shall submit the request for waiver in writing and under oath or affirmation on an approved form provided by the commission on ethics. The document shall contain written acknowledgment of compliance with the provisions of subsection (5)a. through (5)e. of this subsection, together with such pertinent facts and relevant documents that support such waiver. A waiver under this subsection must be approved by both the employee's direct supervisor and the chief administrative officer of the county or municipality or their designees. The county or municipality shall record such waiver in the employee's personnel file and shall submit a copy of the waiver and all related documents to the commission on ethics. The commission on ethics in its discretion may elect to review,



comment on, or investigate any waiver. The commission on ethics review or investigation shall not delay an employee's ability to take the part-time employment.

- g. *Official law enforcement or fire rescue overtime or extra duty details approved by the county or municipality of the employee.* The provisions of subsection (d) shall be waived for outside employment when that employment consists of a certified police agency extra duty detail or a certified firefighter or paramedic extra duty detail when contracted or administered by the police or fire rescue agency as applicable. For the purpose of this subsection, all records of external, extra duty or overtime security details, including supervisor approval, identity of contracting parties, and including time, date and manner of detail shall be maintained by the individual contracting or administrating police or fire rescue agency, records of which shall be accessible to the public subject to state public records disclosure exemptions.
- 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.
- G. **Contingent fee prohibition.** No person shall, in whole or in part, pay, give or agree to pay or give a contingency fee to another person. No person shall, in whole or in part, receive or agree to receive a contingency fee. As used herein, "contingency fee" means a fee, bonus, commission, or nonmonetary benefit as compensation, which is dependent on or in any way contingent on the passage, defeat, or modification of: an ordinance, resolution, action or decision of the board of county commissioners or local municipal governing body as applicable, any employee authorized to act on behalf of the board of county commissioners or local municipal governing body as applicable, the county administrator or municipal administrator as applicable, or any action or decision of an advisory board or committee. This prohibition does not apply to real estate brokers when acting in the course of their profession as regulated by Florida Statutes, §§475.001—475.5018, as may be amended. Nothing in this section may be construed to prohibit any salesperson from engaging in legitimate government business on behalf of a company from receiving compensation or commission as part of a bona fide contractual arrangement with that company provided such compensation or commission is ordinary and customary in the industry. Nothing in this section may be construed to prohibit an attorney from representing a client in a judicial proceeding or formal administrative hearing pursuant to a contingent fee arrangement if allowed by the rules of the Florida Bar.
- H. **Honesty in applications for positions.** No person seeking to become an official or employee, or seeking any promotion or job reassignment within the public entity that currently employs them, or seeking to enter into a contract or otherwise seeking to provide goods or services to the county or municipality as applicable, may make any false statement, submit any false document, or knowingly withhold information about wrongdoing in connection with employment by or services to the county or municipality as applicable.
- I. **Disclosure or use of certain information.** A current or former official or employee shall not disclose or use information not available to members of the general public and gained by reason of his or her official position, except for information relating exclusively to governmental practices, for his or her personal gain or benefit or for the personal gain or benefit of any other person.

(Ord. No. 2011-011, §1(Exh. 1), 5-17-11, 4-6-21)

Sec. 2-444. Gift law.

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



2. No vendor, lobbyist, or principal or employer of a lobbyist that lobbies, sells, or leases to the county or a municipality as applicable, 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 the vendor, lobbyist, or principal knows, or should know with the exercise of reasonable care, is an official or employee of that county or municipality. For the purposes of this subsection (a)(2), the term vendor also includes any person or entity that, because of the nature of their business, may respond to an invitation to bid, request for proposal or other procurement opportunity that has been published by the county or a municipality.
- B. 1. No advisory board member, or any other person 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 recipient's advisory board or any county or municipal department as applicable that is subject in any way to the advisory board's authority, influence or advice.
2. No vendor, lobbyist, or principal or employer of a lobbyist who lobbies, sells, or leases to an advisory board or any county or municipal department as applicable that is subject in any way to the advisory board's authority, influence or advice, 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 the vendor, lobbyist, or principal knows, or should know through the exercise of reasonable care, is a member of that advisory board. For the purposes of this subsection (b)(2), the term vendor also includes any person or entity that, because of the nature of their business, may respond to an invitation to bid, request for proposal or other procurement opportunity that has been published by the county or a municipality.
- C. No county commissioner, member of a local governing body, mayor or chief executive officer 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 a gift of any value 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, where the gift is for the personal benefit of the official or employee, another official or employee, or any relative or household member of the official or employee. No advisory board member or any other person or business entity on his or her behalf, shall knowingly solicit a gift of any value 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 recipient's advisory board or any county or municipal department as applicable that is subject in any way to the advisory board's authority, influence or advice, where the gift is for the personal benefit of the advisory board member, another advisory board member, another official or employee, or any relative or household member of the official or employee.
- D. For purposes of this section, a principal or employer of a lobbyist shall include any officer, partner or director of the principal or employer entity, or any employee of a principal or employer 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 or employer employs a lobbyist.
- 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.
 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, including, but not limited to, the state's definition of gift, exceptions thereto, and gift valuations. The county code of ethics' definition of gift and exceptions thereto shall not be used by reporting individuals to complete and file state gift



reporting disclosures. When a state reporting individual files or is required to file a gift report with the state, a copy of each report shall also be filed with the county commission on ethics no later than ten (10) days after the report is filed with the state. Failure to file a State of Florida Quarterly Gift Disclosure Form with the county commission on ethics within the required timeframe shall be a violation of this section.

2. All other officials and employees who are not reporting individuals under state law.

- a. **Personal gifts.** All officials and employees who are not reporting individuals under state law are not required to report gifts in excess of one hundred dollars (\$100) so long as those gifts are given to the official or employee by a personal friend or co-worker and the circumstances demonstrate that the motivation for the gift was the personal or social relationship rather than an attempt to obtain the goodwill or otherwise influence the official or employee in the performance of his or her official duties. Factors to be considered in determining whether a gift was motivated by a personal or social relationship may include but shall not be limited to: whether the relationship began before or after the official or employee obtained his or her office or position; the prior history of gift giving between the individuals; whether the gift was given in connection with a holiday or other special occasion; whether the donor personally paid for the gift or sought a tax deduction or business reimbursement; and whether the donor gave similar gifts to other officials or employees at or near the same time. If the personal friend or co-worker is a vendor, lobbyist or principal or employer of a lobbyist that lobbies the county or municipality as applicable, then the official or employee shall not accept a gift in excess of one hundred dollars (\$100) in accordance with subsections (a)(1) and (b)(1).
- b. **All other gifts.** All officials or employees who are not reporting individuals under state law and who receive any gift in excess of one hundred dollars (\$100), which is not otherwise excluded or prohibited pursuant to this subsection, shall complete and submit an annual gift disclosure report with the county commission on ethics no later than January 31 of each year for the previous calendar year (January 1 through December 31). All officials or employees, who are not reporting individuals under state law and who do not receive a gift in excess of one hundred dollars (\$100) during a given reporting period shall not file an annual gift disclosure report. The annual gift disclosure report shall be created by the county commission on ethics and shall be in a form substantially similar in content as that required by state law. The county code of ethics' definition of gift and exceptions thereto shall be used by non-state-reporting individuals in completing and filing annual gift disclosure reports required by this section.

G. Exceptions. For the purposes of this section, the following shall not be considered a gift:

1. Political contributions specifically authorized by state or federal law;
2. Gifts from any relatives, domestic partners, and dependents named on the official's or employee's latest federal income tax return, or one's household member;
3. Awards for professional or civic achievement;
4. Materials such as books, reports, periodicals or pamphlets that are solely informational or of an advertising nature;
5. Gifts solicited or accepted by county or municipal officials or employees as applicable on behalf of the county or municipality in performance of their official duties for use solely by the county or municipality for a public purpose;
6. Publicly advertised offers for goods or services from a vendor under the same terms and conditions as are offered or made available to the general public;
7. Inheritance or other devise;
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;



9. A ticket, pass or admission in connection with public events, appearances or ceremonies related to official county or municipal business, if furnished by a nonprofit sponsor organization of such public event, or if furnished pursuant to a contract between the event's non-profit sponsor and the county or municipality as applicable, provided the sponsor organization does not employ a lobbyist, and further provided the ticket, pass or admission is given by a representative of the sponsor organization who is not otherwise a lobbyist or a principal or employer of a lobbyist. Notwithstanding the exception as provided in this subsection, the ticket, pass, or admission must be disclosed in accordance with the gift law reporting requirements of subsections (f)(1) and (f)(2);
10. Expenditures made in connection with an event sponsored by a nonprofit organization funded in whole or in part with public funds whose primary function is to encourage and attract tourism or other business opportunities for the benefit of Palm Beach County or the municipalities as applicable, provided the sponsor organization does not employ a lobbyist, and further provided that the invitation to the event is made by a representative of the sponsor organization and the representative is not otherwise a lobbyist or a principal or employer of a lobbyist. Notwithstanding the exception as provided in this subsection, the expenditure must be disclosed in accordance with the gift law reporting requirements of subsections (f)(1) and (f)(2).

H. Solicitation of contributions on behalf of a non-profit charitable organization.

1. Notwithstanding the prohibition on gifts as outlined in subsections (a) and (b), the solicitation of funds by a county or municipal official or employee for a non-profit charitable organization, as defined under the Internal Revenue Code, is permissible so long as there is no quid pro quo or other special consideration, including any direct or indirect special financial benefit to the official or employee or to the person or entity being solicited. The solicitation by an official or employee as contemplated herein, is expressly prohibited if made to any person or entity with a pending application for approval or award of any nature before the county or municipality as applicable.
2. To promote the full and complete transparency of any such solicitation, officials and employees shall disclose, on a form provided by the commission on ethics, the name of the charitable organization, the event for which the funds were solicited, the name of any person or entity that was contacted regarding a solicitation or pledge by the official or employee, and the amount of the funds solicited or pledged if known. The form shall be completed legibly and shall be filed with the commission on ethics. The form shall be filed within thirty (30) days from the occurrence of the event for which the solicitation was made, or if no event, within thirty (30) days from the occurrence of the solicitation.

(Ord. No. 2011-011, §1(Exh. 1), 5-17-11, 4-6-21)

Sec. 2-445. Anti-nepotism law.

An official may not appoint, employ, promote, advance, or advocate for appointment, employment, promotion, or advancement in or to a position in the county or municipality as applicable in which the official is serving or over which the official exercises jurisdiction or control, any individual who is a relative or domestic partner of the official. An individual may not be appointed, employed, promoted, or advanced in or to a position in the county or a municipality if such appointment, employment, promotion, or advancement has been advocated by an official, serving in or exercising jurisdiction or control over the county or municipality as appropriate, who is a relative or domestic partner of the individual or if such appointment, employment, promotion, or advancement is made by a collegial body of which a relative or domestic partner of the individual is a member. However, this section shall not apply to appointments to boards other than those with land-planning or zoning responsibilities in those municipalities with less than thirty-five thousand (35,000) population. This section does not apply to persons serving in a volunteer capacity who provide emergency medical, firefighting, or police services. Such persons may receive, without losing their volunteer status, reimbursements for the costs of any training they get relating to the provision of volunteer emergency medical, firefighting, or police services and payment for any incidental expenses relating to those services that they provide. Mere approval of budgets shall not be sufficient to constitute "jurisdiction or control" for the purposes of this section.

1. For the purposes of this section, "official" means any official or employee in whom is vested the authority by law, rule, or regulation, or to whom the authority has been delegated to appoint, employ, promote, or advance individuals or to recommend individuals for appointment, employment, promotion,



or advancement in connection with employment in the county or municipality as applicable.

2. For the purposes of this section, "relative" means spouse, parent, child, sibling, uncle, aunt, first cousin, nephew, niece, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half-brother, or half-sister.

(Ord. No. 2011-011, §1(Exh. 1), 5-17-11, 4-6-21)

Sec. 2-446. Ethics training.

- A. Officials and employees, as public servants, are considered stewards of the public trust and should aspire to the highest level of integrity and character. Officials and employees shall be informed of their ethical responsibilities at the start of their public service, and shall receive updates and training materials on ethics issues throughout the span of their public service. The county administrator or municipal administrator, as applicable, shall establish, by policy, a mandatory training schedule for all officials, employees, and local government attorneys as defined in Florida Statutes §112.313, which shall include mandatory periodic follow-up sessions. This policy may also address ethics training for entities that receive county or municipal funds as applicable.
- B. The commission on ethics shall develop and deliver, or contract with other entities to develop and deliver, training programs. The commission on ethics shall coordinate and cooperate with all affected county or municipal entities, departments, agencies, boards, councils and commissions to ensure that effective and meaningful training experiences are delivered in a timely and efficient manner.

(Ord. No. 2011-011, §1(Exh. 1), 5-17-11, 4-6-21)

Sec. 2-447. Noninterference.

It shall be a violation of this article for any person: (a) to retaliate against, punish, threaten, harass, or penalize any person for communicating, cooperating with, or assisting the commission on ethics or the inspector general; or (b) to interfere, obstruct or attempt to interfere or obstruct without valid legal basis any investigation conducted by the commission on ethics or the inspector general.

(Ord. No. 2011-011, §1(Exh. 1), 5-17-11)

Sec. 2-448. Administration, enforcement and penalties.

- A. The commission on ethics shall be empowered to review, interpret, render advisory opinions, and enforce this code of ethics pursuant to the procedures established in the county commission on ethics ordinance. Jurisdiction of the commission on ethics with respect to advisory opinions rendered shall extend to all county and municipal officials and employees, and all other persons and entities required to comply with the provisions of this code and the county lobbyist registration ordinance, including but not limited to lobbyists, their employers and principals, and contractors and vendors and their employees.
- B. A finding by the commission on ethics of a violation of any part of this article shall subject the person or entity to public reprimand, a fine of up to five hundred dollars (\$500), or both. The commission on ethics may also order the person or entity to pay restitution when the person or entity or a third party has received a pecuniary benefit as a result of the person's violation.
- C. Upon a finding of the commission on ethics or hearing officer that a violation of this article or the lobbyist registration ordinance resulted in a contract, grant, subsidy, license, permit, franchise, use, certificate, development order or other benefit conferred by the county or municipality as applicable, then such contract, grant, subsidy, license, permit, franchise, use, certificate, development order or other benefit may be rescinded or declared void by the board of county commissioners or the local municipal governing body as applicable.
- D. The commission on ethics may refer willful violations of sections 2-443, 2-444(a), 2-444(b), 2-444(c), 2-444(e), or 2-447 to the state attorney when deemed appropriate. Pursuant to Florida Statutes, §125.69, a person who violates the sections of the article set forth in this section 2-448(d) shall be subject to prosecution in the name of the state in the same manner as first degree misdemeanors are prosecuted, and upon conviction, such person may be punished by a fine not to exceed one thousand dollars (\$1,000), imprisonment not to exceed one (1) year, or both.

(Ord. No. 2011-011, §1(Exh. 1), 5-17-11, 4-6-21)



Palm Beach County

Palm Beach County Commission on Ethics Jurisdiction



Honesty • Integrity • Character

Palm Beach County Commission on Ethics
300 North Dixie Highway, Suite 450
West Palm Beach, FL 33401
ethics@pbc.gov
561-355-1915