



Honesty - Integrity - Character

**Palm Beach County
Commission on Ethics**

The Historic 1916 Courthouse
300 N. Dixie Hwy, Suite 450
West Palm Beach, FL 33401
561.355.1915

FAX: 561.355.1904

Hotline: 877.766.5920

E-mail: ethics@pbc.gov

Commissioners

Michael S. Kridel, Chair
Peter L. Cruise, Vice Chair
Michael Kugler
Rodney G. Romano
Kristin A. Vara-Garcia

Executive Director

Christie Kelley

General Counsel

Rhonda Giger

Intake & Compliance Manager

Gina A. Levesque

Education & Communications Manager

S. Lizabeth Martin

Investigator

Mark A. Higgs

Investigator

Abigail Irizarry

News Release

For immediate release:

Contact:

November 7, 2025

Christie Kelley, Executive Director
(561) 355-1915

Summary of Palm Beach County Commission on Ethics Meeting Held on November 6, 2025

The Palm Beach County Commission on Ethics (COE) took the following action at its monthly public meeting held on November 6, 2025.

Three complaints were heard in executive session. The complete files will be available on the COE's website within seven days at: <http://www.palmbeachcountyethics.com/complaints.htm>.

C24-018: After considering the probable cause recommendation submitted by the COE advocate, the COE found that probable cause existed and issued a letter of instruction after a determination that the violation may have been inadvertent or unintentional. Upon issuance of the letter of instruction, the complaint was dismissed pursuant to Commission on Ethics Ordinance Section 2-260.3(b).

C25-007: After considering the COE advocate's recommendation that probable cause did not exist, the COE accepted the recommendation and dismissed the complaint.

C25-008: After considering the COE advocate's recommendation that probable cause did not exist, the COE accepted the recommendation and dismissed the complaint.

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

RQO 25-010: A City employee asked if the Palm Beach County Code of Ethics (Code) would prohibit him from allowing a non-profit partner of the City to retain the remaining funds (raised during a joint fundraiser) to cover the administrative costs incurred during the fundraising campaign.

The COE opined as follows: The Code does not bar the City's non-profit partner from retaining the remaining funds from a joint fundraiser to cover administrative costs incurred during the fundraising campaign. Generally, the Code only restricts actions that would result in a prohibited person or entity receiving a prohibited special financial benefit. Because this action does not involve a prohibited entity, it is not prohibited by the Code.

RQO 25-011: A planning and zoning board member asked if the Code would prohibit him and/or his outside employer from representing a client intending to enter into a lease with an entity who regularly appears before his advisory board?

The COE opined as follows: Neither the board member nor his outside business are prohibited from representing a client in lease negotiations as long as the guidance in the opinion is followed, which includes ensuring that a prohibited entity does not receive a special financial benefit as a result of the representation.

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

#