



**GOREN CHEROF
DOODY & EZROL P.A.**
ATTORNEYS AT LAW

BROWARD COUNTY CODE OF ETHICS ADVISORY OPINION

To: Commissioner Maria Rodriguez

From: Samuel S. Goren, City Attorney *SSG*
Jacob G. Horowitz, Deputy City Attorney *JGH*

Date: June 23, 2025

Re: City of Pembroke Pines ("City") / Code of Ethics – Advisory Opinion

I. ISSUE AND FACTS PRESENTED

In your capacity as a City Commissioner, you have been invited to attend a training conference (the "Event") sponsored by Local Progress Policy Action ("Local Progress"), a 501(c)(4) organization comprised of local elected officials whose mission is to advance a racial and economic justice agenda through all levels of local government. The event is scheduled to take place from July 10 - 12, 2025.

You indicated that you have applied for and been awarded a scholarship from Local Progress which will pay for all travel, meals and accommodation expenses associated with the training event. The Event will include speakers, panels, workshops, networking opportunities, and related community events.

To the best of your knowledge, Local Progress is not a lobbyist, contractor or vendor of the City of Pembroke Pines.

You have inquired as to whether the Broward County Code of Ethics for Elected Officials ("Code of Ethics") permits you to accept the invitation to the Summit.

II. ANSWER

For the reasons set forth herein, the Code of Ethics **does not** prohibit you from accepting Local Progress' invitation to the Event, including the related expenses associated with the training. The gift restrictions set forth in the Code of Ethics include a specific exception for "training, including the payment or reimbursement of expenses incurred in connection therewith, provided the training relates to the Elected Official's public service." Since the Event is specifically

organized as a training opportunity for local elected officials, you are permitted to accept the invitation and attend the event, in accordance with the Code of Ethics. *Section 1-19(C)(1)(e), Broward County Code of Ordinances.*

III. ANALYSIS

The Code of Ethics expressly incorporates the definition of “gift” from Ch. 112, F.S. Section 112.312(12)(a), F.S., defines “gift” to specifically include “tickets to events,” “transportation” and “food or beverage.” Therefore, the invitation to the Event, including travel and lodging, registration and other related expenses are considered a “gifts” under both the Broward County Code of Ethics and Ch. 112, F.S.

The Code of Ethics, which is more restrictive than state law, establishes the following three (3) categories of gifts:

- 1) Gifts from lobbyists, vendors and contractors;
- 2) Official capacity gifts; and
- 3) Personal (nonofficial) capacity gifts.

The invitation to the Event was not offered by a lobbyist, vendor or contractor, as those terms are defined in the Code. However, the invitation from Local Progress to attend the Event, including the payment of all related expenses, was extended to you in your official capacity as a member of the city commission. Therefore, the invitation, including all ancillary travel, lodging meals and other expenses would be considered “official capacity” gifts pursuant to the Code.

The Code of Ethics provides that “Elected Officials may accept gifts from other sources [not lobbyists, vendors or contractors] given to them in their official capacity, where not otherwise inconsistent with the provisions of Ch. 112, Part III, F.S., up to a maximum value of \$50.00 per occurrence.” While the actual value of the invitation to the Event, including the travel, lodging, meals and registration is unknown, it would presumably far exceed the \$50.00 limit on official capacity gifts.

However, the Code of Ethics further states, “When not otherwise permitted by the part (c)(1), ‘Acceptance of Gifts,’ the following items may be accepted to the full extent permissible under state law:

...

2. Training, including the payment or reimbursement of expenses incurred in connection therewith, provided the training relates to the Elected Official’s public service. The receipt of such training is deemed to directly benefit the public on which behalf the Elected Official serves.”

A copy of the Event itinerary is attached as Exhibit “A.” The itinerary includes a program replete with training opportunities associated with your position as a local elected official. Therefore, in

our opinion, the Event, including its related expenses, would fall within the “training” exception set forth in the Code of Ethics. In accordance with the training exception in the Code, you are legally permitted to accept the invitation to the Event in your official capacity as a member of the city commission.

Notwithstanding the foregoing, to the extent that you do choose to accept the invitation and attend the Event, the City Attorney’s Office recommends that you complete and file a Form 9 quarterly gift disclosure and report the item as a permissible gift pursuant to Sec. 112.3148, F.S.

IV. CONCLUSION

For the reasons set forth herein, it is the opinion of the City Attorney’s Office that the invitation to the Event, including all related expenses, falls within the training exception from the limitations on gifts set forth in the Broward County Code of Ethics. Therefore, you are legally permitted to accept the invitation to the Event, subject to the appropriate Form 9 disclosure pursuant to Sec. 112.3148, F.S.

This advisory opinion is issued pursuant to Section 1-19(c)(8) of the Broward County Code of Ordinances and may be relied upon by the individual who made the request. This analysis is limited solely to the facts presented. Within fifteen (15) days of receiving this opinion, a copy must be sent in a searchable “pdf” format to ethicsadvisoryopinions@broward.org for inclusion in the searchable database of advisory opinions maintained by the County.

Please contact our office if there is any additional information that we can provide.



Draft National Convening Program

Last updated: May 8, 2025 / All times listed in CDT

Thursday, July 10

8:00am - 10:00am	Breakfast	<i>TBD</i>
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9:00am - 10:30am	Pride Caucus Meeting	<i>TBD</i>
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10:00am - 11:15am	Breakout Sessions	
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| • Governance Training: Setting Up and Managing Your Office | <i>TBD</i> |
| • Lessons in State Hostility | <i>TBD</i> |
| • Building our Infrastructure in Rural and Small Towns | |
| • Comms Skills Training: Don't Wait for Coverage – Make your own Content! | <i>TBD</i> |

10:30am - 12:00pm	Women's Caucus	<i>TBD</i>
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12:00pm - 1:00pm	Lunch	<i>TBD</i>
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1:00pm - 2:00pm	Opening Plenary: Welcome to Chicago	<i>TBD</i>
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2:00pm - 3:30pm	Black Caucus Meeting	<i>TBD</i>
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2:15pm - 3:45pm	PGA: Collaborative Governance Training	<i>TBD</i>
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2:30pm - 3:45pm	Breakout Sessions	
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| • Organizing Cross-Locally to Win in State Advocacy | <i>TBD</i> |
| • Federal Briefing: budget reconciliation impact on budgets, etc | <i>TBD</i> |

3:30pm - 4:45pm	Breakout Sessions	
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TBD

	<ul style="list-style-type: none"> • Facing down backlash and weaponized attacks • Art and Storytelling training 	<i>TBD</i>
3:30pm - 5:00pm	Nuestro Caucus Meeting	<i>TBD</i>
3:00pm - 4:30pm	Progressive Governance Academy training: Collaborative Governance	<i>TBD</i>
4:00pm - 5:30pm	New Member Orientation	<i>TBD</i>
5:30pm - 7:00pm	Welcome Reception	<i>TBD</i>

Friday, July 11

8:00am - 10:00am	Breakfast	<i>TBD</i>
8:00am - 9:00am	Movement Organizing Village with LP Partners	<i>TBD</i>
9:00am - 10:15am	Governing for All Plenary	<i>TBD</i>
10:30am - 12:00pm	Breakout Sessions	
	<ul style="list-style-type: none"> • Protecting the Trans community • How AI and Big Tech are impacting our communities and how to take action • Public Education is Under Attack: How to Support Students • “Design Your Own CBA” Workshop training • New surveillance technologies • Environmental Justice: Richmond and Carrboro case studies • Immigration: policy updates + communications training • Local Elected Security Training with Women’s Democracy Lab 	<i>TBD</i> <i>TBD</i> <i>TBD</i> <i>TBD</i> <i>TBD</i> <i>TBD</i> <i>TBD</i>
10:00am - 1:00pm	Movement Organizing Village with LP Partners	<i>TBD</i>
12:00pm - 1:00pm	Lunch	<i>TBD</i>
1:00pm - 2:00pm	Keynote	<i>TBD</i>

2:00pm - 5:00pm Site Visits

- Humboldt Park *Off-site*
- Pilsen & Chinatown *Off-site*
- Mental health clinic and CARE team *Off-site*
- Dyett High School *Off-site*
- Albany Park: Deportation defense *Off-site*
- Logan Square: affordable housing and transit *Off-site*
- Southside - Woodlawn anti-displacement and community benefits *Off-site*
- Labor and back of the hotel house *TBD*

6:30pm - 8:00pm Evening Reception: Celebrating Our Movement TBD

Saturday, July 12

8:00am - 10:00am Breakfast TBD

9:00am - 10:00am Hour-Long Strategy Downloads

- Mutual Aid *TBD*
- Food Access: Municipal Grocery Stores *TBD*
- Unhoused Response *TBD*
- TBD *TBD*

10:30am - 12:00pm Organizing Together plenary TBD

12:00pm - 1:00pm Lunch TBD

1:15pm - 2:45pm Breakout Sessions

- Criminal justice *TBD*
 - Housing and land *TBD*
 - Defending equity from attacks on "DEI"
 - Immigration Defense and Rapid Response *TBD*
 - Municipal finance: Governing in an austerity era
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<ul style="list-style-type: none"> What would a real living wage look like in 2025? 		<i>TBD</i>
3:00pm - 4:00pm	Closing Session	<i>TBD</i>
4:00pm - 5:00pm	Cash Bar	