

ETHICS OPINION
Office of the City Attorney

TO: Mayor Scott Brook

FROM: John J. Hearn, City Attorney

RE: Attending the 2025 Mayors Summit Against Antisemitism

DATE: July 22, 2025

You have asked if you may attend the 2025 Mayors Summit Against Antisemitism in New Orleans from December 2, 2025 through December 4, 2025. The Summit is organized by the City of New Orleans and the Combat Antisemitism Movement. The purpose of the Summit is to bring mayors and city officials together to share strategies, forge partnerships, and chart a path forward for cities to confront antisemitism with clarity and purposes. While there, you will be attending keynote speeches, attending dynamic panels and workshops, attending focused breakout sessions, and will have an opportunity to network to exchange ideas, build lasting partnerships, and drive meaningful change. Combat Hate Foundation, a 501(c)(3) corporation, has offered to pay for your registration, travel and accommodation expenses.

A priority of the City Commission of Coral Springs is combatting antisemitism. This was evidenced through its passage of Resolution 2019-029 condemning antisemitism. In that Resolution, the City Commission recognized that the City is a diverse community which is home to many Jewish people and Jewish houses of worship. The Resolution also detailed the growing number of antisemitic incidents throughout the United States, and reaffirmed the City Commission's commitment to the health, safety and welfare of its residents. In support of this priority, you attended last year's Summit. Attendance at this year's Summit will also be in accordance with the City's priority of this issue.

If these facts are incorrect or inaccurate in any way, please let us know, because it will affect the opinion that we give.

The Broward County Code of Ethics provides that Municipal Elected Officials "shall not accept gifts, directly or indirectly, regardless of value" from any lobbyist registered with the City, from any principal/employer of any such lobbyist, or from vendors or contractors of the City. Section 1-19(c)(1)a., County Code of Ordinances. Commissioners may accept gifts in an "official capacity" from "other sources" up to \$50.00 per occurrence. "Gift" is defined in accordance with Chapter 112, Florida Statutes.

The Combat Hate Foundation is not a not lobbyist, vendor or contractor of the City. The Broward County Ethics Ordinance limits gifts given to municipal elected officials in

their official capacity from “other sources” up to \$50.00. Therefore, you may only accept a gift relating to the Summit (including travel expenses, accommodations, and meals) from the Combat Hate Foundation up to \$50.00.

Under Section 112.312(12)(b)(3), Florida Statutes, “Gift” does not include “[a]n honorarium or an expense related to an honorarium event paid to a person or the person’s spouse.” Florida Commission on Ethics Rule 34-13.220 fully defines an “honorarium.” Under that definition, an honorarium is defined as “[a] speech, address, oration, or other oral presentation by the reporting individual or procurement employee. . . .” An honorarium does not include the payment or provision of actual and reasonable transportation, lodging, and food and beverage expenses related to the honorarium event, including any event or meeting registration fee, for a reporting individual or procurement employee and spouse.

However, under subsection (3), to the extent that the transportation, lodging, and food and beverages provided or paid for exceed “actual and reasonable expenses,” this amount constitutes an honorarium. Factors which the Commission will consider in determining the reasonableness of honorarium event related expenses¹ include, but are not limited to:

- (a) The distance the reporting individual or procurement employee was required to travel to attend the event or function;
- (b) The mode of transportation which was utilized by the reporting individual or procurement employee to travel to and from the event or function;
- (c) The length of the speech or oral presentation made by the reporting individual or procurement employee;
- (d) The length of the event or function where the reporting individual or procurement employee spoke;
- (e) The time of day that the reporting individual or procurement employee made the speech or oral presentation;
- (f) Participation by the reporting individual or procurement employee at other events or presentations reasonably necessary to the presentation made by the reporting individual or procurement employee; and
- (g) Whether the honorarium event related expenses received by the reporting individual or procurement employee are comparable to expenses incurred by other persons attending the event.

Applying these factors, payment of your registration, travel, and accommodation expenses by the Combat Hate Foundation in this case would constitute an honorarium, since you will be participating in dynamic panels and workshops with other Mayors over a three-day period, you would have to travel a significant distance to attend the Summit, your participation is particularly significant where the City Commission has prioritized combatting antisemitism, and there is no indication that your travel expenses are not

¹ “Honorarium event” is defined as “a meeting or function, or a series of related meetings or functions such as a convention held over several days, where the reporting individual or procurement employee has been invited to make a speech, address, oration, or other oral presentation” *Florida Commission on Ethics Rule 34-13.230.*

comparable to expenses incurred by other persons attending the event. Moreover, because the panels and workshops are dynamic, and because networking events are included, you will in effect be giving oral presentations throughout based upon your experience as Mayor of a City with a substantial Jewish presence.

This conclusion is consistent with our opinion on your attendance at last year's Summit, It is also further supported by an opinion issued by our office in 2020 regarding your attendance at the Smart City Summit & Expo in Taipei, Taiwan being considered an honorarium. In both cases, your representation of the City at these events is in accordance with City Commission priorities and is in accordance with our past opinions on honorariums.

If you need additional guidance regarding this matter, please feel free to contact my office.