ETHICS OPINION Office of the City Attorney

TO:

Mayor Scott Brook

The Coral Springs City Commission

FROM:

John J. Hearn, City Attorney

RE:

Attending the Coral Springs Community Chest Grant Awards Breakfast

DATE:

October 28, 2025

On your behalf, Luwam Ghremay, the City Commission Relationship Manager, has asked if you may attend the Coral Springs Community Chest Grant Awards Breakfast. The value of the ticket is \$50.00. 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 "directly or indirectly, any gift of food and/or nonalcoholic beverages with a value in excess of \$25.00 or any other gift with a value in excess of \$5.00" 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 Coral Springs Community Chest is a contractor of the City. Therefore, you may only normally accept up to \$25.00 in food and beverage from the Community Chest. However, there is an exemption under Section 112.312(c)(e)(4) for Official Events, which is applicable in this case. That Section allows acceptance of up to \$100.00 for admission to an event, food, beverages and commemorative events under certain circumstances where such is available to all attendees of the event. In this case, this is an Official Event where your attendance at the event serves a public purpose as the Community Chest is a charitable community organization which works closely with the City and is supported by the City on an annual basis. Additionally, the food and beverages served are available to all attendees of the event. Under this Section, you may accept the full value of the \$50.00 ticket.

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