

## BROWARD COUNTY CODE OF ETHICS ADVISORY OPINION

To: Commissioner Ashira Mohammed

From: Jacob G. Horowitz, Town Attorney

Date: October 31, 2025

Re: Town of Pembroke Park (“Town”) / Code of Ethics – Advisory Opinion

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### I. ISSUE AND FACTS PRESENTED

In your capacity as commissioner, you have been invited by H.E. Ambassador André Corrêa do Lago, President of COP30, and Michael R. Bloomberg, Founder, Bloomberg Philanthropies to attend the C40 World Mayors Summit 2025 and the COP30 Local Leaders Forum taking place from November 3-5, 2025 in Rio de Janeiro, Brazil (the “Summit”). All travel, meals and accommodation expenses will be paid by Bloomberg Philanthropies (the “Foundation”), a 501(c)(3) not-for-profit organization. The Summit will include keynote speakers, panels and workshop events, networking opportunities, and community events.

The Summit will spotlight local climate solutions, showcasing how cities, states and regions are driving global climate progress. The Summit is intended to train leaders at the local, state and national level on climate issues through a blend of “high-level plenary, focused thematic sessions and strategic networking” where participants will “exchange ideas, build partnerships and champion a unified subnational climate agenda.” The Summit’s website and invitation materials provide additional details about public official training opportunities associated with the Summit.

To the best of your knowledge, the Foundation is not a lobbyist, contractor or vendor of the Town of Pembroke Park. 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 the Foundation’s invitation to the Summit with expenses paid by the Foundation. 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 Summit is a training opportunity for public officials

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which relates to your public service, you are permitted to accept the invitation and attend the Summit, 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 Summit, 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 Summit was not offered by a lobbyist, vendor or contractor, as those terms are defined in the Code. However, the invitation to attend the event by the Foundation was extended to you in your official capacity as a commissioner. Therefore, the invitation, including all related 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 Summit, including the travel, lodging, meals and registration is unknown at the current time, it would presumably far exceed the \$50.00 limit on official capacity gifts. The Foundation has indicated that the total cost of your attendance at the Summit would be provided to you for disclosure purposes, if necessary.

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.”

The information provided by the Foundation and contained within the Summit’s website confirms the training opportunity associated with attendance at the Summit. Furthermore, there is no provision in state law that would otherwise limit your ability to accept the invitation, subject to the

appropriate disclosure. In our opinion, the invitation to attend the Summit, including all related expenses, relates to your public service and falls within the training exception set forth in the Code of Ethics. Therefore, you are legally permitted under the Code of Ethics to accept the invitation and attend the Summit.

Notwithstanding the foregoing, to the extent that you do choose to accept the invitation and attend the Summit, the Town 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 Town Attorney's Office that the invitation to the Summit, 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 Summit, 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](mailto: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.