FILE 2729 – January 25, 2019

GIFT PROHIBITIONS; CONFLICT OF INTEREST

DISTRICT SCHOOL BOARD MEMBER AFFILIATED WITH NONPROFIT THAT IS ACCEPTING DONATIONS FROM/ENTERING INTO CONTRACTS WITH DISTRICT VENDORS

To: Ms. Lori Alhadeff (Broward County)

SUMMARY:

Donations received by a nonprofit corporation where a District School Board member serves as the founder, president, and spokesperson will not constitute "gifts" to the Board member under Section 112.3148, Florida Statutes, even if the donations are made by entities doing business with the District. And because the Board member does not have an employment or contractual relationship with the nonprofit, she will not be presented with a conflict of interest under Section 112.313(7)(a), Florida Statutes, if the nonprofit enters into a contractual arrangement with a District vendor. Referenced are CEO 18-13, CEO 16-1, CEO 15-8, CEO 14-12, CEO 10-2, CEO 00-23, and CEO 91-52.

QUESTION 1:

Does a member of a District School Board receive a prohibited gift under Section 112.3148(4), Florida Statutes, if a nonprofit corporation, which she founded and for which she serves an uncompensated officer, accepts donations from District vendors?

Question 1 is answered in the negative.
In your letter of inquiry and additional information provided to our staff, you state you currently serve as a member of the Broward County School Board. You also indicate you and your husband are the founders of Make Our Schools Safe, a nonprofit corporation organized pursuant to s. 501(c)(3) of the Internal Revenue Code. Currently, you relate, you serve as the president of the nonprofit while your husband serves as vice-president. You emphasize that neither of you collects a salary or receives any monetary compensation from the nonprofit, and that—while officers—you are not members, as the nonprofit's articles of incorporation do not provide for membership.

You state Make Our Schools Safe was formed in response to the shooting at Marjory Stoneman Douglas High School in 2018, an incident in which your daughter was killed. You indicate the nonprofit is dedicated to promoting awareness, creating education, and providing financial support for school-safety initiatives. As such, it engages in extensive fundraising. Your inquiry centers on the gift law implications for you if the nonprofit accepts donations from entities conducting business with the District, considering that you hold public office on the District Board. You relate you do not anticipate directly soliciting contributions or donations from District vendors, although vendors may respond to a general solicitation made to the public or simply through awareness of the nonprofit's goals. You indicate Make Our Schools Safe intends to give a large percentage of the donations it receives to the District.¹

As a public officer required to file financial disclosure, you are a "reporting individual" subject to the restrictions and disclosure requirements of Section 112.3148, Florida Statutes (the "gifts" law). See CEO 16-1. Section 112.3148(4), Florida Statutes, which is one of the prohibitions

¹ There is no legal obligation for Make Our Schools Safe to release any of its funds to the District. You indicate it has no contractual relationship with the District or with any schools within the District, and is not selling any goods or services to the District.
to which you are subject, states:

A reporting individual or procurement employee or any other person on his or her behalf is prohibited from knowingly accepting, directly or indirectly, a gift from a vendor doing business with the reporting individual's or procurement employee's agency, a political committee as defined in s. 106.011, or a lobbyist who lobbies the reporting individual's or procurement employee's agency, or, directly or indirectly on behalf of the partner, firm, employer, or principal of a lobbyist, if he or she knows or reasonably believes that the gift has a value in excess of $100; however, such a gift may be accepted by such person on behalf of a governmental entity or a charitable organization. If the gift is accepted on behalf of a governmental entity or charitable organization, the person receiving the gift shall not maintain custody of the gift for any period of time beyond that reasonably necessary to arrange for the transfer of custody and ownership of the gift.

In short, Section 112.3148(4) prohibits you, or anyone acting on your behalf, from accepting "directly or indirectly" any gift worth more than $100 from a District lobbyist, a principal of a District lobbyist, or a District vendor.

Your situation does not involve a "direct" gift because the donations will be made to Make Our Schools Safe, not to you personally. The question then becomes whether the contributions can

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2 The term "lobbyist" is defined in Section 112.3148(2)(b)1., Florida Statutes, to mean any natural person who, for compensation, seeks, or sought during the preceding 12 months, to influence the governmental decisionmaking of a reporting individual or procurement employee or his or her agency or seeks, or sought during the preceding 12 months, to encourage the passage, defeat, or modification of any proposal or recommendation by the reporting individual or procurement employee or his or her agency.

3 The term "vendor" is defined in Section 112.3148(2)(f), Florida Statutes, to mean "a business entity doing business directly with an agency, such as renting, leasing, or selling any realty, goods or services." Your inquiry specifically concerns District vendors, as you ask about donations made by entities doing business with the District.
be viewed as "indirect" gifts to you. Commission on Ethics Rule 34-13.310(8)(a), Florida Administrative Code, describes the concept of an "indirect gift" as follows:

Where a gift is provided to a person other than the reporting individual or procurement employee by a political committee or vendor, by a lobbyist who lobbies the agency of the reporting individual or procurement employee, or by the partner, firm, employer, or principal of a lobbyist, where the gift or the benefit of the gift ultimately is received by the reporting individual or procurement employee, and where the gift is provided with the intent to benefit the reporting individual or procurement employee, such gift will be considered an indirect gift to the reporting individual or procurement employee.

The Rule proceeds to list factors the Commission can weigh in determining whether an indirect gift has been made, but expressly states the Commission is not limited to those factors alone.4

4 The considerations are listed in Rule 34-13.310(8)(c), Florida Administrative Code, which states:

Factors which the Commission will consider in determining whether an indirect gift has been made include but are not limited to:

1. The existence or nonexistence of communications by the donor indicating the donor’s intent to make or convey the gift to the reporting individual or procurement employee rather than to the intervening third person;
2. The existence or nonexistence of any relationship between the donor and the third person, independent of the relationship between the donor and the reporting individual or procurement employee, that would motivate a gift to the third person;
3. The existence or nonexistence of any relationship between the third person and the reporting individual or procurement employee that would motivate the gift;
4. Whether the same or similar gifts have been or are being provided to other persons having the same relationship to the donor as the third person;
5. Whether, under the circumstances, the third person had full and independent decision-making authority to determine whether the reporting individual or procurement employee, or another, would
Here, we acknowledge the fact that you are intertwined with Make Our Schools Safe. You and your husband founded the corporation and currently serve, respectively, as its president and vice-president. You indicate you attend its meetings and have spoken on its behalf at various events. However, the fact remains that any donations made to Make Our Schools Safe will be kept and used only by the nonprofit, and you advise that Make Our Schools Safe will not be releasing any portion of the donations—or any other consideration—to you or your husband. Nor will you or your husband personally benefit from the financial stability the donations will bring to the organization, as neither of you collect a salary or receive any monetary compensation from it. Because you will not personally benefit from the donations made to Make Our Schools Safe, we find they cannot be considered "indirect gifts" to you.

We considered a similar situation in CEO 91-52, which concerned a city commissioner soliciting funds on behalf of a nonprofit organization that was hoping to establish a bird sanctuary and nature center at a municipal park. In that situation, we found that because any solicited donations would benefit the nonprofit without bringing a corresponding benefit to the commissioner, they would not be considered "gifts" to her. We find your situation comparable, as the donations here to Make Our Schools Safe will not bring a corresponding benefit to you.

However, while the donations will not be considered "indirect gifts," you should be aware

6. Whether the third person was acting with the knowledge or consent of, or under the direction of, the donor;
7. Whether there were or were intended any payments or bookkeeping transactions between the third person and the donor, reimbursing the third person for the gift; and
8. The degree of ownership or control the donor has over the third person.
of two other provisions of the Code of Ethics concerning any contributions made to Make Our Schools Safe. Section 112.313(2), Florida Statutes, prohibits you from soliciting or accepting any donation based on an understanding that the contribution will influence some vote, official action, or judgment that you must make in your capacity as a School Board member. In addition, Section 112.313(4), Florida Statutes, prohibits you from accepting any donation when you know, or with the exercise of reasonable care should know, that it is being given to influence some action you might take as a School Board member.5

Question 1 is answered accordingly.

QUESTION 2:

Would you have a prohibited conflict of interest under Section 112.313(7)(a), Florida Statutes, if the nonprofit corporation previously described contracts with a District vendor?

Question 2 is answered in the negative.

You state the website for Make Our Schools Safe has a page where visitors can browse and purchase hats, shirts, and sweatshirts made by I-Uniforms, a clothing company. You indicate I-Uniforms sends a quarterly check to Make Our Schools Safe with a percentage of any sales made from the website. Although not expressly stated in your inquiry, it is assumed that this arrangement is pursuant to a contractual relationship between Make Our Schools Safe and I-Uniforms. You also

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5 You also inquire whether you must file any forms if you engage in fundraising activities on behalf of Make Our Schools Safe. The forms promulgated by the Commission for filing by gift recipients are not relevant to raising funds on behalf of another entity. We recommend you contact the District's General Counsel to clarify whether additional forms outside the
relate I-Uniforms sells uniforms to several charter schools within the District. You inquire whether you will have a conflict of interest if Make Our Schools Safe continues in its arrangement with I-Uniforms, considering that I-Uniforms is a District vendor.

The statute pertinent to your inquiry is Section 112.313(7)(a), Florida Statutes, which states:

CONFLICTING EMPLOYMENT OR CONTRACTUAL RELATIONSHIP.--No public officer or employee of an agency shall have or hold any employment or contractual relationship with any business entity or any agency which is subject to the regulation of, or is doing business with, an agency of which he is an officer or employee ...; nor shall an officer or employee of an agency have or hold any employment or contractual relationship that will create a continuing or frequently recurring conflict between his or her private interests and the performance of his or her public duties or that would impede the full and faithful discharge of his or her public duties.

The statute is only triggered, however, if a public officer or employee holds an employment or contractual relationship in addition to his primary public office or employment. See CEO 18-13 and CEO 15-8. The question thus becomes whether your involvement with Make Our Schools Safe constitutes an "employment" or "contractual" relationship.

Neither relationship is present here. A necessary element of "employment" is compensation or some form of consideration. See CEO 18-13 and CEO 00-23. Here, you indicate you accept no compensation or any form of consideration from Make Our Schools Safe. You also state that while you serve as president of Make Our Schools Safe, its articles of incorporation do not provide for membership. In the past, we have found an uncompensated director or officer of a nonprofit corporation, who is not a member, does not have a "contractual relationship" with the corporation. See CEO 14-12 and CEO 10-2. Accordingly, assuming the facts you describe remain materially

Commission on Ethics' purview are required.
unchanged, Section 112.313(7)(a) does not apply as you have not entered into an "employment" or "contractual relationship" with Make Our Schools Safe.

Question 2 is answered accordingly.

GWN/gps/dw

cc: Ms. Lori Alhadeff
Inquiry and Correspondence with Lori Alhadeff

From: Lori Alhadeff <playforalyssa@gmail.com>  
Sent: Tuesday, November 13, 2018 10:05 AM  
To: Schafer, Grayden <SCHAFER.GRAYDEN@leg.state.fl.us>  
Subject: Non Profit ?

Hi Mr. Schafer,

It was so nice to meet you today. I am inquiring about the following questions:

1. My non profit, I am the President, of Make Schools Safe, Inc. I do not receive a salary and a large percentage of our donations will go back to BCPS.
2. Are there any ethical issues if someone who does business with the BCPS donated to my non profit?
3. I want to make sure I follow the rules appropriately.

Sincerely,

Lori Alhadeff

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Lori Alhadeff

Dear Mr. Grayden,

Make Our Schools Safe is a national non-profit organization dedicated to protecting students and teachers at school. Our mission is to improve the safety of schools, research and test best practices, as well as implement those protocols by creating model schools, beginning in South Florida and spreading nationwide. Make Our Schools Safe was founded by Lori and Ilan Alhadeff, who lost their beautiful 14-year old daughter, Alyssa, to the brutal shooting at Marjory Stoneman Douglas High School in Parkland on Valentine’s Day 2018. Alyssa was bright, energetic, happy, athletic – a pure ray of sunshine who lit up every room with her warm smile. She was an honor student, a good friend who was known to stay up later than she should have in order to support others, a winning debater, and a star soccer player, the captain of her traveling team. Alyssa was the kind of girl whom every mother wants their daughter to be friends with, and whom any parent would be proud of. She was
playful, loved dancing, singing, and family beach days on Long Beach Island, New Jersey. At the same time that she was a fierce attacking soccer mid-fielder, she loved clothes, makeup, and all things sparkly off the field. She was the best big sister to her two younger brothers and a mentor to her younger cousins. Alyssa, #8 on the soccer field, often marveled at how her number, when rotated 90 degrees, signifies infinity. Her favorite color was aqua, actually known as the color of protection that wards off the evil eye. We honor her with the infinity and colors in our logo — a symbol of constant alertness that contributes to the safety of our youth. In their grief, the Lori and Ilan Alhadeff established Make Our Schools Safe, Inc. so that no other parent has to endure the pain they live with. Many protocols went amiss at Marjory Stoneman Douglas High School on the tragic day of the shooting. First, there was no perimeter fence to deter the shooter from entering. Second, he walked through an open door. Alyssa’s room was the first one the shooter hit. She was shot immediately, but after the shooter left there was a period during which Alyssa was alive and could move to a designated safe zone in the classroom. She didn’t know where to hide, where the safe zone was. What happened? There was no guidance. When the shooter returned, our Alyssa was shot again… and again… and again. This did not have to happen! Alyssa and the 16 other victims of this atrocity are the impetus for change. It is their spirits that give Make Our Schools Safe the strength to find ways to protect schools everywhere. With their loss, Lori and Ilan feel they have been called to action. The Alhadeffs are now the voice of Alyssa, leading this mission. Alyssa often used her hands to make the symbol of a heart in photos, a sign she and her friends used among each other. This has become an emblem for us as it is with love that we meet our mission head-on. This not just a campaign in the name of Alyssa Alhadeff. We are honoring the lives of the victims of Parkland: Martin Duque Anguiano (14), Nicholas Dworet (17), Jaime Guttenberg (14), Luke Hoyer (15), Cara Loughren (14), Gina Montalto (14), Joaquin Oliver (17), Alaina Petty (14), Meadow Pollack (18), Helena Ramsay (17), Alex Schachter (14), Cameron Schentrup (16), and Peter Wang (15), and faculty members Scott Beigel (35), Aaron Feis (37), and Chris Hixon (49). We provide Dream Team Club tool kits, empowering others to collaborate with local government to impact school safety — it’s literally life or death-level important that our administrators consider school safety as essential as they do the curriculum. Our foundation collaborates with high-level security advisors to offer survival information for protection in emergencies. We are focused on bringing these skills to schools so teachers feel confident to protect their students and themselves. Code-red training must be as intrinsic a part of schooling as fire drills. Visit www.MakeOurSchoolsSafe.org to donate or for more information.—

1. **Empowering Students via Dream Teams** — Provide students training, education, tools and community to empower students to take action to prevent future school shootings, recognize warning signs, how to talk to administrators, teachers, and other adults about school safety and concerns, and understand the best course of action to take in a life and death situation. Meetings are held in the Watercrest Clubhouse, Parkland. Meeting and clubs are not in Broward County Public Schools. Kids do not pay anything to be in the meeting. Meetings are student ran. We have a student Board. Lori Alhadeff and other parents are at the meetings. No one is excluded from the meetings. Scholarships may also be made available in the name of Alyssa Alhadeff and Make Our Schools Safe. Dream Team Clubs are being formed in schools around the country. For example, American University, Nyack High School and St. Andrews High School.

**Goals**

2018 is the foundation year, and our initial goal is to raise $250,000, and each year thereafter $50,000. Annual major fundraising efforts include: May Tennis Round Robin, Summer MSD Alumni Event, Fall FAU charity run, Anniversary 2/14 remembrance. Key partners have been identified for supporting the MOSS cause with portions of proceeds.
from events or sales: local restaurant fundraising events, Guard Dog Security Bullet Proof
Backpacks, Sock it Out socks, iUniforms Inc. for MOSS logo items, and Le Cle Co. We
are advocates for Stop the Bleed Kits and Training, suicide prevention education and
SaferWatch promotion, see something, say something, send something. No money was
given or donated to Make Our Schools Safe from SaferWatch (Broward County School
District uses SaferWatch).

Budget
2018 expenditure priorities have included administrative costs for start-up of the
foundation, creating on-going awareness building marketing, private security company
consultations on campus access points, establishing Dream Team kits to deploy to
schools around the country, and tools including stop the bleed kits and active shooter
training, and suicide prevention awareness training. As of 8/14/18, less than $20,000 has
been spent on expenses as the organization is still in the research and planning phase.

Lori Alhadeff, President, does not take a salary from Make Our Schools
Safe. Current fundraiser, is matching up to $60,000 of funds raised at the
Westglades Middle School in Parkland Florida. I receive no personal benefit
from donating money to Broward County Schools. Make Our Schools Safe does
not sell anything to Broward County Schools. Make Schools Safe, Inc. EIN
number is 82-4648559.

I have publicly spoken at a school in Miami and at a psychology convention not in
Broward County. Please check out our Facebook page Make Our Schools Safe17
and our Instagram page Make Our Schools Safe.

Please let me know if I can answer any other questions? Also, if you could write
the letter for me as discussed it would be greatly be appreciated.

Lori Alhadeff
609-335-8226

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From: Schafer, Grayden
Sent: Thursday, November 15, 2018 2:27 PM
To: 'Lori Alhadeff' <playforalyssa@gmail.com>
Subject: RE: Non Profit?

Ms. Alhadeff:

I enjoyed meeting you on Tuesday at the ethics workshop. I am back in my office and have received your two emails. I
have a few questions for you, just to make sure I understand the factual context of your situation. I apologize if you
have already informed me of some of these answers, but I want to have everything clearly set out in writing. Once I received your answers, I will begin preparing a response letter.

1. My understanding is that you are not collecting a salary from Make Schools Safe, Inc. Are you collecting any other monetary compensation from the organization in place of a salary?

2. Is your husband an officer, partner, director, or proprietor of Make Schools Safe? If so, what is his title?

3. Is your husband collecting a salary or receiving any other monetary compensation from Make Schools Safe?

4. In addition to being the President of Make Schools Safe, are you also considered a member of the organization?

5. Do you anticipate soliciting contributions/donations for the organization from school lobbyists, principals of lobbyists or vendors?

6. Do you anticipate soliciting contributions/donations for the organization from political committees?

7. Do you anticipate soliciting contributions/donations from District employees, personnel, or administration?

8. Is it your intention to donate money raised by Make Schools Safe to the Broward County School District or to schools within the District? If so, will the donations be made with instructions that they be used for a particular purpose?

9. You indicate in your submissions that Make Schools Safe will be sponsoring meetings being held by District students. How will the students be contacted about participating and/or attending the meetings?

10. You indicate in your submissions that Make Schools Safe is matching $60,000 in funds already raised by Westglades Middle School. Were the funds raised with the assistance of Make Schools Safe or just by Westglades Middle School itself?

11. Do you anticipate that Make Schools Safe will partner with the District or schools within the District on future fundraising efforts?

12. Does Make Schools Safe have any contractual relationship with the District or with any schools within the District?

Please let me know if you need clarification on any of these questions. Thank you.

Gray Schafer
Senior Attorney
Florida Commission on Ethics
(850)-488-7864

From: Lori Alhadeff <playforalyssa@gmail.com>
Sent: Monday, November 19, 2018 4:15 PM
To: Schafer, Grayden <SCHAFER.GRAYDEN@leg.state.fl.us>
Subject: Fwd: Please respond

Dear Mr. Schafer,

1. My understanding is that you are not collecting a salary from Make Schools Safe, Inc. Are you collecting any other monetary compensation from the organization in place of a salary? **No, I do not collect a salary or any other monetary compensation from Make Our Schools Safe.**
2. Is your husband an officer, partner, director, or proprietor of Make Schools Safe? If so, what is his title? Yes, Vice President.

3. Is your husband collecting a salary or receiving any other monetary compensation from Make Schools Safe? No, my husband does not collect a salary or receive any other monetary compensation from Make Our Schools Safe.

4. In addition to being the President of Make Schools Safe, are you also considered a member of the organization? Make Our Schools Safe articles of incorporation do not provide for members --- Make Our Schools Safe has no members.

5. Do you anticipate soliciting contributions/donations for the organization from school lobbyists, principals of lobbyists or vendors? No.

6. Do you anticipate soliciting contributions/donations for the organization from political committees? No.

7. Do you anticipate soliciting contributions/donations from District employees, personnel, or administration? Make Our Schools Safe does not intend to solicit the people or organizations named but that they may be solicited as part of a general solicitation.

8. Is it your intention to donate money raised by Make Schools Safe to the Broward County School District or to schools within the District? If so, will the donations be made with instructions that they be used for a particular purpose? The purpose of Make Our Schools Safe is to promote awareness, create education and help support school safety projects both locally and nationally.

9. You indicate in your submissions that Make Schools Safe will be sponsoring meetings being held by District students. How will the students be contacted about participating and/or attending the meetings? Information is sent out through a Remind App.

10. You indicate in your submissions that Make Schools Safe is matching $60,000 in funds already raised by Westglades Middle School. Were the funds raised with the assistance of Make Schools Safe or just by Westglades Middle School itself? In partnership with the Westglades Middle School PTO a fundraiser for school safety was created. Make Our Schools Safe has agreed to match up to $60,000 based on the current fundraising campaign. All funds currently raised were done through the PTO, while marketing was shared across both organizations. See Make Our Schools Safe Instagram for examples.

11. Do you anticipate that Make Schools Safe will partner with the District or schools within the District on future fundraising efforts? The purpose of Make Our Schools Safe is to promote awareness, create education, and provide financial support for school safety initiatives. Should the district be interested in further school safety projects, Make Our Schools Safe would be interested in participating.

12. Does Make Schools Safe have any contractual relationship with the District or with any schools within the District? No.

Please call me if you have any questions.

Sincerely,

Lori Alhadeff

609-335-8226
From: Lori Alhadeff <playforalyssa@gmail.com>
Sent: Wednesday, November 21, 2018 10:59 AM
To: Schafer, Grayden <SCHAFER.GRAYDEN@leg.state.fl.us>
Subject: Re: Please respond

Hi Mr. Schafer,

Please treat my request as a formal opinion.
I’m going to in a separate email in a little bit send you the other question we talked about.

Thank you,

Lori Alhadeff

From: Schafer, Grayden
Sent: Wednesday, November 21, 2018 1:50 PM
To: 'Lori Alhadeff' <playforalyssa@gmail.com>
Subject: RE: Please respond

Thank you, Ms. Alhadeff. Your request will be treated as a formal opinion. I hope you have a great Thanksgiving holiday.

From: Schafer, Grayden
Sent: Thursday, November 29, 2018 2:52 PM
To: 'Lori Alhadeff' <playforalyssa@gmail.com>
Subject: RE: Please respond

Ms. Alhadeff:

I hope your week is going well. Just checking, do you still intend to send in an email with your additional question? If not, I will begin preparing an opinion addressing only your question concerning donations to your nonprofit from District lobbyists/vendors.

Gray Schafer
Senior Attorney
Florida Commission on Ethics
(850)-488-7864

From: Lori Alhadeff <playforalyssa@gmail.com>
Sent: Friday, November 30, 2018 7:10 AM
To: Schafer, Grayden <SCHAFER.GRAYDEN@leg.state.fl.us>
Subject: Re: Please respond

Hi Mr. Schafer,

I am sorry I did not respond sooner I just got home from the FSBA conference.

I will explain our Shop:
On our website, www.MakeOurSchoolsSafe.org we have a Shop. I Uniforms is the company that sells the clothes, hats,....for us. So people go on our website, buy something through I Uniforms, then I Uniforms ships it to the customer. About once every three months Make Our Schools Safe receives a check back from I Uniforms from a small percentage of the sales. I Uniforms sells uniforms from their online store to a few Charter Schools in Broward County. Make Our Schools Safe has nothing to do with that. Please let me know if I need to explain anything further. I also, wanted to know from the state level is there any forms that I need to fill out as a school board member when I help Make Our Schools Safe fundraise at a fundraiser?

Thank you so much,

Lori Alhadeff

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From: Schafer, Grayden  
Sent: Friday, November 30, 2018 10:04 AM  
To: 'Lori Alhadeff' <playforalyssa@gmail.com>  
Subject: RE: Please respond

Thank you, Ms. Alhadeff. I just visited the website and saw the page for I Uniforms.

I will make sure to address in the opinion if there are any Ethics Forms which need to be filed if you fundraise for Make Our Schools Safe.

One point of clarification: My understanding is that while I Uniforms may provide a small percentage of the sales to Make Our Schools Safe, you personally do not receive any of those funds. Is that correct? If not, please explain whether you personally receive any percentage of funds from I Uniforms.

Gray Schafer  
Senior Attorney  
Florida Commission on Ethics  
(850)-488-7864

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From: Lori Alhadeff <playforalyssa@gmail.com>  
Sent: Friday, November 30, 2018 11:14 AM  
To: Schafer, Grayden <SCHAFER.GRAYDEN@leg.state.fl.us>  
Subject: Re: Please respond

Correct, I do not receive personally any funds from I Uniforms. I do not personally receive any funds from any of the fundraisers I do with Make Our Schools Safe and I do not receive any salary.

Thank you,

Lori Alhadeff
Westberry, Diana

From: Schafer, Grayden
Sent: Wednesday, November 21, 2018 11:11 AM
To: Westberry, Diana
Subject: FW: Please respond

Diana:

Pursuant to this request, we’re going to treat Ms. Alhadeff’s question as a formal opinion. Thanks!

Gray

From: Lori Alhadeff <playforalyssa@gmail.com>
Sent: Wednesday, November 21, 2018 10:59 AM
To: Schafer, Grayden <SCHAFER.GRAYDEN@leg.state.fl.us>
Subject: Re: Please respond

Hi Mr. Schafer,

Please treat my request as a formal opinion.
I’m going to in a separate email in a little bit send you the other question we talked about.

Thank you,

Lori Alhadeff
Chris and Diana:

Here is an email from an incoming school board member at the Broward County Public Schools. I will treat it as an informal.

Gray

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From: Lori Alhadeff <playforalyssa@gmail.com>
Sent: Tuesday, November 13, 2018 10:05 AM
To: Schafer, Grayden <SCHAFER.GRAYDEN@leg.state.fl.us>
Subject: Non Profit

Hi Mr. Schafer,

It was so nice to meet you today. I am inquiring about the following questions:

1. My non profit, I am the President, of Make Schools Safe, Inc. I do not receive a salary and a large percentage of our donations will go back to BCPS.
2. Are there any ethical issues if someone who does business with the BCPS donated to my non profit?
3. I want to make sure I follow the rules appropriately.

Sincerely,

Lori Alhadeff

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Lori Alhadeff