

EXECUTIVE DIRECTOR'S REPORT

TO: **Members, Commission on Ethics**

FROM: **Kerrie Stillman**
Executive Director

DATE: **January 8, 2026**

ADVISORY OPINIONS

The Commission on Ethics issued one opinion at its November meeting and two opinions at its December meeting. It has rendered 2,719 opinions since its inception in 1974.

LITIGATION

President of Town Council Elizabeth A. Loper, elected official of the Town of Briny Breezes, et al. v. Lukis et. al., Case 1:24-cv-20604-JAL, (United States District Court Southern District of Florida).

Background

Plaintiffs are multiple elected municipal officers. They are challenging the validity of the requirement in Section 112.3144, Florida Statutes, that municipal elected officials and mayors (and candidates for such offices) must file a CE Form 6 financial disclosure. Plaintiffs' argument is that requiring these types of officers and candidates to publicly disclose the information required on the CE Form 6 violates their First Amendment rights under the United States Constitution, as it is government-compelled, content-based, non-commercial speech. Plaintiffs seek a declaration that extending the requirements in Section 112.3144 to municipal elected officials and municipal candidates is unconstitutional, an injunction against enforcing this provision of the law, and legal costs and fees.

Commission Representation

William Stafford of the Office of the Attorney General is the lead attorney representing the Commission. Gray Schafer and Steven Zuilkowski will be the Commission's points of contact with lead counsel.

Current Status

Each side filed a Motion for Summary Judgment on October 11, 2024, and all related responses were filed by November 8, 2024. No argument on the motions has been scheduled. On September 29, 2025, the Judge issued an Order Staying Case in Anticipation of Final Judgment, staying the action pending the Court's forthcoming order on the cross motions for summary judgment and closing the case for administrative and statistical purposes only. There have been no developments since the last report through January 6, 2026.

Town of Briny Breezes, Florida et al. v. Lukis et al., Case Number 2024 CA 000283, (Fla. 2nd Circ. Ct., Leon County)

Background

Plaintiffs are multiple municipalities and elected municipal officers. They are challenging the validity of the requirement in Section 112.3144, Florida Statutes, that municipal elected officials and mayors (and candidates for such offices) must file a CE Form 6 financial disclosure. In essence, Plaintiffs' argument is that requiring municipal elected officials and municipal candidates to publicly disclose the information required on the CE Form 6 violates their right to

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privacy under Article II, Section 23 of the Florida Constitution. Plaintiffs claim there is no compelling state interest that would justify having these types of officers and candidates disclose that degree of the information, and, even if there was a compelling interest, requiring these officers and candidates to file a CE Form 6 is not the least restrictive means of accomplishing that interest when the CE Form 1 is also available. Plaintiffs seek a declaration that extending the requirements in Section 112.3144 to municipal elected officials and municipal candidates is unconstitutional, an injunction against enforcing this provision of the law, and legal costs.

Commission Representation

William Stafford of the Office of the Attorney General is the lead attorney representing the Commission. Gray Schafer and Steven Zuilkowski are the Commission's points of contact with lead counsel.

Current Status

Defendants have filed a motion to dismiss and Plaintiffs have responded. We await an order on the motion. This case is on hold while the related federal case proceeds. There have been no developments since the last report through January 6, 2026.

Garcia et al. v. Stillman et al., USCA Case No. 23-12663 (11th Circuit Court of Appeals), and S.D. Fla. (1:22-CV-24156-BB)

Background

At the time the case was filed, Plaintiffs were local public officers challenging the In-Office Lobbying Ban found in Article II, Section 8(f)(2), Florida Constitution. The ban became law after the Constitutional Revision Commission proposed it in 2018 via Amendment 12, which passed with 79% of the vote. The District Court entered final judgment in favor of the Plaintiffs, finding that Article II, Section 8(f)(2), was an unconstitutional abridgment of free speech. On August 9, 2023, the District Court entered final judgment enjoining the Commission from enforcing the provision on any public officer in the State. Defendants appealed to the 11th Circuit.

Commission Representation

Nate Forrester of the Office of the Solicitor General is representing Defendants in the appeal. All briefs are filed. Emily Witthoeft of the Office of the Attorney General represents the Commission before the District Court. Steven Zuilkowski is monitoring the appeal.

Current Status

On November 30, 2023, the 11th Circuit stayed the injunction pending a final adjudication of the appeal. The stay allows continued enforcement of the In-Office Lobbying Ban against all public officers except the one named Plaintiff who had standing to challenge the ban. All briefs have been filed and oral argument on the merits of the appeal occurred on February 24, 2025. The audio of that proceeding is available at this link:

[https://www.ca11.uscourts.gov/sites/default/files/oral_argument_recordings/23-](https://www.ca11.uscourts.gov/sites/default/files/oral_argument_recordings/23-12663_02262025.mp3)

[12663_02262025.mp3](https://www.ca11.uscourts.gov/sites/default/files/oral_argument_recordings/23-12663_02262025.mp3) We now await the Court's ruling. There have been no developments since the last report through January 6, 2026.

Jonathan L. Owens v. State of Florida, Office of the Attorney General, Florida Commission on Ethics, and Division of Administrative Hearings, Case Number 2025 CA 001007, (Fla. 2nd Circ. Ct., Leon County)

Background

Plaintiff is the Respondent in Complaint No. 23-231, which, until recently, was about to be tried at DOAH by our Commission Advocate. On June 16, 2025, DOAH issued an order granting Plaintiff's/Respondent's emergency motion to stay the administrative proceedings. On June 18, 2025, the Commission and the other defendants in this case were served with the summons and verified complaint in this matter. The Plaintiff seeks a declaration that the ethics hearing at DOAH violates his First Amendment rights and that the Commission lacks jurisdiction to pursue any action against him for violating Section 112.313(8), F.S.

Commission Representation

James Waczewski of the Office of the Attorney General represents the Commission and the other defendants. Gray Schafer and Steven Zuilkowski are monitoring the case. Joseph Burns is the Commission Advocate representing the Commission at DOAH.

Current Status

On September 2, 2025, Mr. Waczewski filed a motion to dismiss the case on behalf of Defendants. A hearing on the motion was held on November 25, 2025. The judge granted the motion to dismiss with prejudice and Mr. Waczewski submitted a proposed order consistent with the ruling. On January 6, 2026, the Court issued its order in favor of the Commission on Ethics. The matter is now intended to proceed to DOAH, barring an appeal.

Lauren Ramirez v. Commission on Ethics, Case Number 5D2025-3173, (Fla. 5th DCA).

Background

On October 17, 2025, Appellant submitted a timely appeal of the formal opinion (CEO 25-6) the Commission issued to her after the September 12, 2025 Commission meeting.

Commission Representation

Stephanie Novenario and Steven Zuilkowski are handling the appeal.

Current Status

On December 5, 2025, the Court accepted Appellant's Amended Notice of Voluntary Dismissal. The case is now closed.

Ferdell Baker v. Florida Commission on Ethics, Case Number SC2025-1748, (Florida Supreme Court)

Background

On November 6, 2025, Petitioner filed this action with the Florida Supreme Court apparently seeking a Writ of Mandamus. We have not received the Petition yet. Steven Zuilkowski is monitoring the case.

Current Status

On December 23, 2025, the Supreme Court transferred the case to the Circuit Court of the Second Judicial Circuit, in and for Leon County.

STAFF ANNOUNCEMENTS AND TRAINING

Amelia spoke in Orlando, on October 30, at the Florida Bar Criminal Law Section's "Inside the Florida Legislature" annual legislative update CLE. She provided attendees with an overview of the Code of Ethics and the new stolen valor law.

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On November 18, Stephanie conducted a one-hour general ethics training via videoconference for staff of the Miami-Dade Sheriff's Office, Property Appraiser's Office, and the Office of the Supervisor of Elections.

Kerrie provided two-hours of ethics training to County Commissioners on November 18, at the Institute for County Government's 2025 Ethics, Public Records, and Sunshine Law training in Tampa.

On December 3, Amelia provided training to the Public Service Commission on the CE Form 1 Statement of Financial Interests and the CE Form 9 Quarterly Gift Disclosure forms.

FINANCES & BUDGET

As of November 30, 2025, we've spent \$1,256,281.35 (40.95%) of our appropriation, with 41.67% of the FY gone.

Attached to this report are documents related to the Executive Branch Lobbyist Registration Trust Fund and the Commission's FY 2026-2027 proposed budgets that were submitted to the House and Senate in December. Due to the cancellation of the December meeting, the budgets were reviewed with the Chair prior to submission.

PENDING ORDERS IMPOSING PENALTIES

GOVERNOR

Complaint No. 17-088, In re Cheryl Thomas-Hughes (Final Order 12/12/18)

Complaint No. 18-168, In re Dustin Daniels (Final Order 04/21/21)

Complaint No. 21-113, In re Dennis Ward (4-27-22)

Complaint No. 20-060,

20-073, 20-103(Cons.), In re Douglas Underhill (Final Order Upon DCA Mandate 4/30/2025)

Complaint No. 21-039 to 052, 21-057, 21-060, & 21-064 (Cons), In re Vanessa Baugh (2/1/2023)

Complaint No. 23-168, In re Henry Rosenthal (Final Order 4/19/2024)

Complaint No. 23-200, In re Michael Cusack (Final Order 4/19/2024)

Complaint No. 23-221, In re Ken Mascara (Final Order 7/31/2024)

Complaint No. 22-041, 22-115 (Cons.), In re Gregory Tony (3/7/2025)

Complaint No. 22-103, In re Michael Andrew White (3/7/2025)

Complaint No. 24-156, In re Bowen Kou (3/7/2025)

Complaint No. 24-172, 24-225 (Cons.), In re Lauro Diaz (3/7/2025)

Complaint No. 23-283, In re Angela McDonald (Final Order 4/25/2025)

Complaint No. 24-008, In re Kenneth Brenner (Final Order 4/25/2025)

Complaint No. 24-048, In re Ron Mueller (Final Order 4/25/2025)

Complaint No. 24-268, In re Annette Redman (6/6/2025)

Complaint No. 24-277, In re Tamara Goehler (6/6/2025)

Complaint No. 22-082, In re Vennis Gilmore (9/12/25)

Complaint No. 21-017, 21-031 (cons.), In re John Stevens (Final Order 11/19/25)

HOUSE

Complaint No. 18-026, In re Kim Daniels (Final Order 1/30/2019)

Complaint No. 20-206, In re Jackie Toledo (Final Order 10/27/2021)

Complaint No. 20-211, In re Tracie Davis (Final Order 10/27/2021)

Complaint No. 21-159, In re Tracie Davis (Final Order 6/8/2022)

SENATE

Complaint No. 18-090, In re Daphne Campbell (Final Order 3/9/2022)

**PENDING ACTION ON STATUTORILY-GENERATED LOBBYING FIRM AUDIT
MATTERS (GOVERNOR AND CABINET)**

Complaint No. 16-017, In re Dean Mead (Probable Cause 01/27/17)

Complaint No. 16-018, In re Buigas and Associates (Probable Cause 01/27/17)

Complaint No. 16-019, In re DDarling Consulting (Probable Cause 01/27/17).

Complaint No. 16-174, In re Kathy Till and Associates, Inc., (Probable Cause 08/02/17)

Complaint No. 16-170, In re Capitol Group, Inc., (Probable Cause 10/25/17)

Complaint No. 16-173, In re Johnson Strategies, LLC (Probable Cause 12/13/17)

Complaint No. 16-175, In re Sayfie Law Firm (Probable Cause 10/25/17)

Complaint No. 17-132, In re Andrew J. Liles (Probable Cause 08/01/18)

Complaint No. 17-134, In re Lester Abberger (Probable Cause 08/01/18)

Complaint No. 17-135, In re Pruitt and Associates (Probable Cause 08/01/18)

Complaint No. 17-136, In re Wilson and Associates, LLC (Probable Cause 08/01/18)

Complaint No. 17-137, In re TC Wolfe (Probable Cause 08/01/18)

Complaint No. 19-031, In re Impact GR (Probable cause 09/18/19)

Complaint No. 20-055, In re All Florida Solutions, Inc. (Probable Cause 03/10/21)

Complaint No. 20-056, In re Carr Allison (Probable Cause 03/10/21)

Complaint No. 20-058, In re Pyle and Associates (Probable Cause 03/10/21)

Complaint No. 21-127, In re Diana Hadi Padgett (Probable Cause 12/3/21)

Complaint No. 21-128, In re CJT Strategies, LLC (Probable Cause 12/3/21)

Complaint No. 22-074, In re Capitol Strategy Group (12/2/22)

Complaint No. 22-075, In re Buchanan, Ingwersoll, and Rooney (12/2/22)

Executive Lobbyist Trust Fund
Fact Sheet

Kerrie Stillman, Executive Director	Fiscal Year 2024-2025			Fiscal Year 2025-2026			Fiscal Year 2026-2027		
	Actual			Estimated			Proposed		
	FTE	1.00	0.00	FTE	1.00	0.00	FTE	1.00	0.00
		Fiscal Year 2024-2025			Fiscal Year 2025-2026			Fiscal Year 2026-2027	
	FY 2024-2025	2024-2025	Actual	FY 2025-2026	2025-2026	Estimated	FY 2026-2026	2026-2027	Proposed
	Funds Available	Actual Expenditures	Unspent Balance	Funds Available	Estimated Expenditures	Unspent Balance	Funds Available	Proposed Expenditures	Unspent Balance
Carry Forward	655,067	145,260	509,807	511,374	50,015	461,358	462,532	0	462,532
Appropriation Categories:									
Salaries	106,534	106,056	478	108,899	108,803	96	111,110	111,110	0
OPS	77,744	77,744	0	77,790	77,790	0	77,790	77,790	0
Expense	8,373	7,284	1,089	8,291	7,213	1,078	9,335	9,335	0
OCO	0	0	0	0	0	0	0	0	0
Risk Management	160	160	0	157	157	0	157	157	0
Unspent Budget	0	0	0	0	0	0	0	0	0
Subtotal Appropriation	192,811	191,244	1,567	195,137	193,963	1,174	198,392	198,392	0
% Change from prior year	-1.55%	-25.04%		1.21%	1.42%		1.67%	1.42%	
Total Funds (Appropriation plus Carry Forward)	847,878	336,504	511,374	706,511	243,979	462,532	660,924	198,392	462,532
% Change from prior year	-1.45%	-46.36%		-16.67%	-27.50%		-6.45%	-18.68%	
Carry Forward Plan of Expenditures for Approval:		Fiscal Year 2024-2025			Fiscal Year 2025-2026			Fiscal Year 2026-2027	
Leave Payouts									
On-Line Registration Project									
Auditing Compensation Reports									
BFS-CC(Banking /Financial svcs-credit card)		7,985			306				
Accounting Services		137,275			49,709			5,000	
Total Carry Forward Planned Expenditures	0	145,260	0	0	50,015	0	5,000	0	0

Object Code	Position	Job Class Title	Name of Employee	F.T.E.	Annual Salary	Annual Benefits	Total Salary and Benefits 2026-2027
Salaries and Related Benefits::							
	Salaries & Benefits		86,110				
110000	Salary for support from the Commission on Ethics		25,000				
	Total Salary for Ethics support & Personnel Plan						\$ 111,110
 Other Personal Services-Contractual:							
131100	Accounting/Auditing Services		71,000				
134216	Records Mgmt/Dispositions Svcs		187				
134505	Banking/Financial SVCS-Credit Card/E-Commerce		5,522				
242072	Repairs/Maintenance - Contract - Equipment		1,081				
	Total Other Personal Services-Staff-Contractual						\$ 77,790
 Expenses:							
210000	Postage		75				
210001	Freight		25				
221017	Communications - Telephone - Local		100				
230000	Printing/Reproduction - General		50				
241018	Repairs/Maintenance - Commodities - Equip/Tools		25				
341018	Office Supplies		157				
341018	Supplies - Office - Consumable		157				
341023	Supplies - Information Tech		150				
414000	Insurance - Property		19				
431000	Property Rental - DMS		8,462				
461004	Fees- Notary Public		115				
	Total Expenses						\$ 9,335
 Special Category:							
Risk Management:							
412000	INSURANCE - General Liability		157				
	Total Special Category						\$ 157
	TOTAL FY 2026-2027 Requested Appropriation						\$ 198,392

Executive Branch Lobbyist Registration

FY 2026-2027 Operating Budget

Commission on Ethics
Fact Sheet

Kerrie Stillman, Executive Director	Fiscal Year 2024-2025			Fiscal Year 2025-2026			Fiscal Year 2026-2027		
	Actual			Estimated			Proposed		
FTE Vacant	23.00 1.00			23.00 0.00			23.00 0.00		
	Fiscal Year 2024-2025			Fiscal Year 2025-2026			Fiscal Year 2026-2027		
	FY 2024-2025	2024-2025	Actual	FY 2025-2026	2025-2026	Actual	FY 2026-2027	2026-2027	Proposed
	Funds Available	Actual Expenditures	Unspent Balance	Funds Available	Estimated Expenditures	Unspent Balance	Funds Available	Proposed Expenditures	Unspent Balance
Carry Forward	3,415,959	323,457	3,092,502	3,311,449	195,843	3,115,606	3,260,735	0	3,260,735
Appropriation Categories:									
Salaries	2,185,291	2,179,029	6,262	2,283,523	2,231,410	52,113	2,341,474	2,341,474	-
OPS	549,220	430,317	118,903	516,515	489,884	26,631	526,300	526,300	-
Expense	285,747	200,054	85,693	267,058	225,656	41,402	271,136	271,136	-
OCO	-	-	-	-	-	-	-	-	-
Unspent Budget	8,089	-	8,089.00	24,983	-	24,983	-	-	-
Risk Management	43,799	43,799	-	36,049	36,049	-	36,049	36,049	-
Administrative Hearings	42,116	42,116	-	24,807	24,807	-	9,609	9,609	-
Subtotal Appropriation	3,114,262	2,895,315	218,947	3,152,935	3,007,806	145,129	3,184,568	3,184,568	-
% Change from prior year	-0.15%	3.17%		1.24%	3.89%		1.00%	5.88%	
Total Funds (Appropriation plus Carry Forward)	6,530,221	3,218,771	3,311,449	6,464,384	3,203,649	3,260,735	6,445,303	3,184,568	3,260,735
% Change from prior year	1.83%	7.41%		-1.01%	-0.47%		-0.30%	-0.60%	
Carry Forward Plan of Expenditures for Approval:	Fiscal Year 2024-2025			Fiscal Year 2025-2026			Fiscal Year 2026-2027		
Construction** (office for additional investigator or attorney)	322,464			20,000					
Legal - Gen and attorneys									
Contractual Services- FDMS									
Postage/Mail**									
Printing	993								
Equipment Maintenance Contract									
Vehicle									
DP Equipment									
Leave Payouts									
Call Center									
Total Carry Forward Planned Expenditures	323,457	262,416	195,843	22,380	173,463	10,000	262,416	262,416	-

Object Code	Description	Amount	Total 2026-2027
	Salaries & Benefits:		
	Directors	388,119	
	Disclosure	259,911	
	Legal	477,245	
	Administration	383,190	
	Investigatons	838,647	
110042	Salary for support from the Commission on Ethics	(25,000)	
110000	Personnel Plan (Salary & Benefits)	19,362	
	Total Salaries & Related Benefits-Staff		\$ 2,341,474
	Other Personal Services-Contractual:		
121000	OPS legal intern 30 hrs/wk for 9 weeks @\$15/hr	4,360	
131400	Court Reporting/Transcription General	950	
131600	Legal Services-General	473,540	
131654	Legal Services - Attorneys	30,000	
132200	Temporary Employment Services	0	
132500	Investigative Services-General	0	
132800	Training	4,000	
133100	Legal Advertisement	4,750	
134100	Sec -General	1,425	
134108	Security Services-Alarms/Monitoring	500	
134216	Records Mgmt/Disposition Svcs	3,800	
134505	BFS-CC	2,500	
242072	Repairs/Maintenance - Contract - Equipment	0	
261000	Travel-In state-General	475	
	Total Other Personal Services-Contractual		\$ 526,300
	Expenses:		
210000	Postage	18,000	
210001	Freight	2,500	
221017	Communications - Telephone - Local	300	
221018	Communications - Telephone - Long Distance	300	
221100	Communications - Telephone - Cellular	1,000	
223012	Communications - Suncom Data Circuits	11,300	
230000	Printing General	5,000	
230000	Printing/Reproduction - General	(460)	
241000	Repairs/Maintenance - Commodities - General	830	

Object Code	Description	Amount	Total 2026-2027
241037	Repairs/Maintenance - Commodities - Buildings	460	
241032	Repairs/Maintenance - Commodities - Vehicles	400	
241051	Repairs/Maintenance - Commodities - Parts/Fittings	460	
243023	Repairs/Maintenance - No Contract - Equipment	500	
261000	Travel - In State - General	47,000	
262000	Travel - Out of State - General	6,000	
341000	Supplies - General	920	
341018	Supplies - Office - Consumable	5,000	
341022	Supplies - Furniture/Equipment	5,000	
341023	Supplies - Information Tech	2,050	
341024	Supplies - Information Technology - Software Licenses	13,000	
364104	Fuel - Vehicle/Equipment - Gasoline	2,200	
414000	Insurance - Property	920	
419000	Insurance - Other	95	
434000	Property Rental - Nongovernmental Entities	104,671	
442000	Equipment Rental - Printer	1,875	
443000	Equipment Rent-Postage	2,650	
461004	Notary	370	
461006	Fees-Notary Public	345	
461011	Fees - Legal - Clerk/Filing/subpoenas	2,980	
461009	Registration/License/Permit - General	1,800	
461200	Fees-Jury & Witness Fees	230	
492000	Subscriptions-General	2,940	
492100	Subscriptions-On-Line/Electronic	28,500	
493000	Dues-General	2,000	
Total Expenses			\$ 271,136
SPECIAL CATEGORY			
Risk Management:			
412000	INSURANCE - General Liability	36,049	
Legal Services:			
131600	Legal Services- Administrative Hearings (Categ. 100565)	9,609	
Total Special Category			\$ 45,658
Total FY 2026-2027 Requested Appropriation			\$ 3,184,568

FLORIDA COMMISSION ON ETHICS CONTRACT LIST FY 2026-2027

Vendor Name	Effective Date	Expiration Date	Description	Contract Amt. 2026-2027	Total Multi-Year Contract Amt.
Sanjiti2020, LLC (office space lease)	7/1/2022	6/30/2029	Lease of office space	\$ 104,671.00	\$ 617,008.00
Office of the Attorney General*	7/1/2026	6/30/2027	Contract for Commission Advocates	\$ 473,540.00	
West Publishing - 3-year contract	7/1/2025	6/30/2028	Legal Research	\$ 15,952.00	\$ 47,891.28
West Publishing (CLEAR)	7/1/2025	6/30/2028	Investigative research (TBD - estimated)	\$ 2,511.00	\$ 7,537.20
West Library (books) 3-year contract	7/1/2025	6/30/2028	Law Books	\$ 2,848.00	\$ 8,552.88
Quadient	7/21/2024	7/20/2029	Postage machine lease	\$ 1,988.52	\$ 9,942.60
Doubletree Hotel Tallahassee	1/1/2024	12/31/2024	Hotel rooms for Commissioners for mtgs in Tallahassee	\$149/night per room	
ROI Solutions	5/1/2025	8/15/2025	Call Center (renewal)	less than \$262,416	

*will increase if GAA includes across-the-board salary increases