

Annual Ethics Update: Jacksonville City Council

Kirby Oberdorfer

Executive Director

Jacksonville Office of Ethics, Compliance, and Oversight

Steven J. Zuilkowski

Deputy Executive Director & General Counsel

Florida Commission on Ethics

June 9, 2025



About the Commission on Ethics

State Agency

Created 1974
9 Commissioners
24 Employees

Statewide Jurisdiction

State Agencies
Local Agencies

Laws Administered

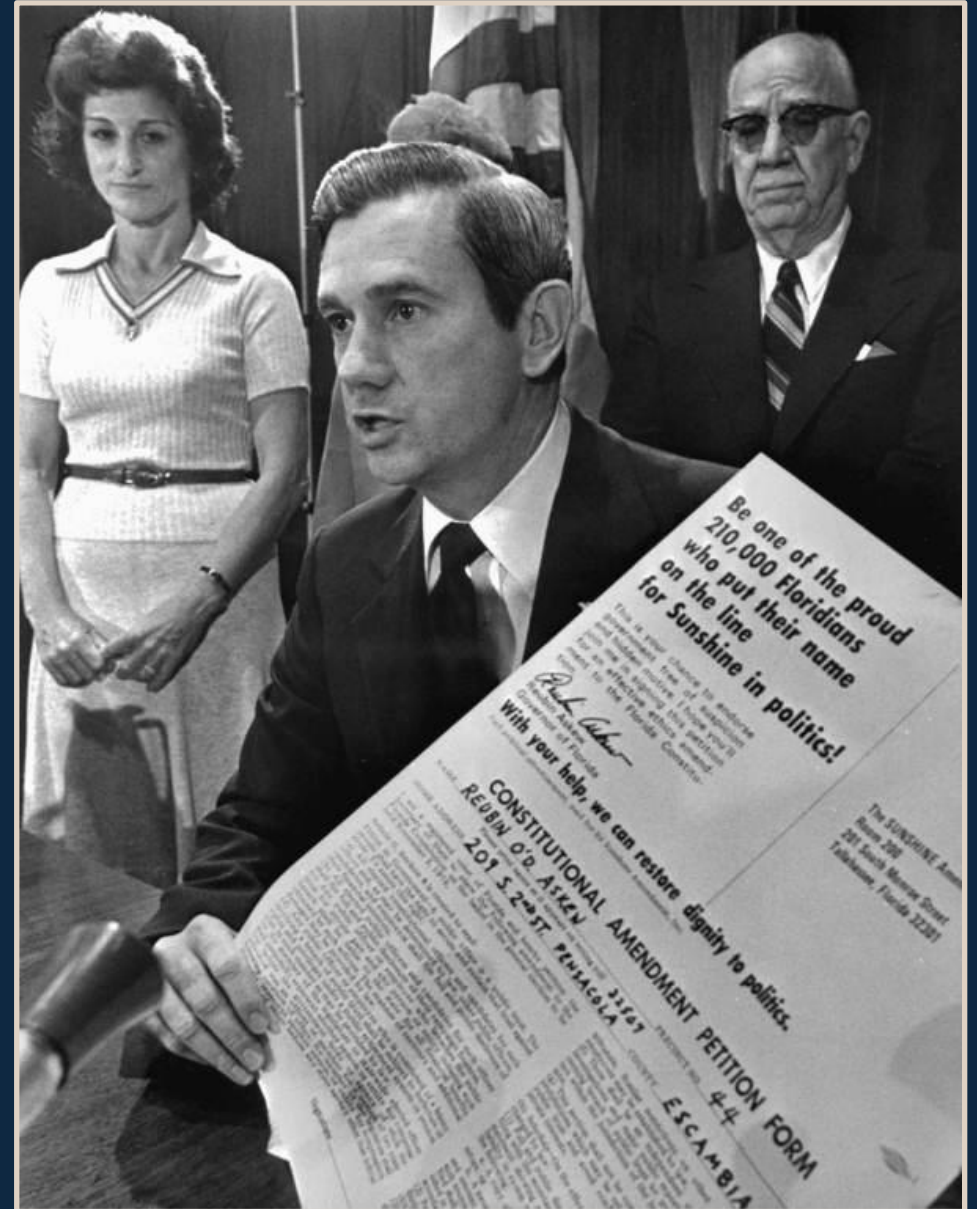
The Code of Ethics
The Sunshine Amendment

The Sunshine Amendment

Adopted in 1976

Created the Code of Ethics

Named the Commission on Ethics
as the State's Ethics Agency



Missions of the Commission on Ethics

Ethics Complaints

Complaints from the public
No self-initiation of complaints

Disclosure

Financial disclosures
Gift disclosures
Client disclosures

Guidance & Trainings

3 ways to obtain guidance

Obtaining Ethics Guidance from the Commission

Over the phone

- Uncomplicated facts and plenty of precedent in formal opinions
- Ethics Hotline: (850) 488-7864

Guidance Letters

- Complicated facts, but plenty of precedent in formal opinions
- Written by legal staff of the Commission on Ethics

Formal Opinions

- Guidance issued by majority vote of the Commission
- Binding advice on the requestor

State Annual Ethics Training

GENERAL EXPLANATION

- **Four-hour training requirement:**

- The Code of Ethics for Public Officers and Employees (Ch. 112, F.S.)
- The Sunshine Amendment (Art. II, s. 8, Fla. Const.)
- Public records laws
- Open meetings laws
- Curriculum: CEOs 13-15 & 13-24.
- 50-minute hours. CEO 13-15, Q3.

Who is required to certify training?

- Elected municipal officers;
- Mayors;
- Constitutional Officers;
- CRA commissioners;
- Elected officers of independent special districts; and
- Those appointed to fill those vacancies if their service:
 - began on/before 3/31 of the year being disclosed [§ 112.3142(2)(f), F.S.]; and
 - continued through 12/31 [CEO 15-5].

Gifts intended to
influence

Quid pro quo

Unauthorized
Compensation

Prohibition on Quid Pro Quo

§ 112.313(2), Fla. Stat.

Applies to:

- Public Officers
- Public Employees
- Local Government Attorneys
- Candidates for Office

They cannot solicit or accept anything of value based on an understanding that their vote, official action, or judgment would be influenced.

Recent Example: See *In re Alexis Rodriguez*, Commission on Ethics Complaint No. 20-225, Final Order No. 21-031 (candidate for office accepted money based on an understanding that he would change his party affiliation, qualify to run in the 2020 FL Senate race, and file a false CE Form 6.)

Unauthorized Compensation

§ 112.313(4), Fla. Stat.

Applies to:

- Public Officers
- Local Government Attorneys
- Public Employees
- Their spouses & minor children

They cannot accept anything of value if they know or, with the exercise of reasonable care, should know, that it was given to influence their vote or official action they are expected to take.

The law requires public officers and employees to ask themselves, “*Why are they giving me this gift?*”

The Gifts Law

Gifts from:

- Relatives
- Restricted Donors
- Everyone Else

Valuation

Gifts Law: Relatives

GENERAL EXPLANATION

- **The General Rule:** A reporting individual can always accept and need not disclose a gift from a relative.

- | | | | |
|---------------|------------------|--------------------|---|
| •father | •niece | •stepmother | •great grandchild |
| •mother | •husband | •stepson | •step grandparent |
| •son | •wife | •stepdaughter | •step great grandparent |
| •daughter | •father-in-law | •stepbrother | •step grandchild |
| •brother | •mother-in-law | •stepsister | •step great grandchild |
| •sister | •son-in-law | •half brother | •fiancé |
| •uncle | •daughter-in-law | •half sister | •someone you intend to form a household |
| •aunt | •brother-in-law | •grandparent | •person with same legal residence (co-inhabitant) |
| •first cousin | •sister-in-law | •great grandparent | |
| •nephew | •stepfather | •grandchild | |

Gifts Law: Restricted Donors

As applied to §§ 112.3148(3)-(4), Fla. Stat.

For purposes of the Solicitation Ban and the Acceptance Ban, the following are referred to as “**restricted donors**”:

- Vendors
- Political Committees (§ 106.011, F.S.)
- Lobbyists
- Partner, Firm, Employer, or Principal of a Lobbyist

Gifts Law: Solicitation Ban

§ 112.3148(3), Fla. Stat.

Applies to:

- Reporting Individuals
- Executive & Judicial Branch Procurement Employees

They cannot solicit a gift of any value from a “restricted donor” for their benefit or the benefit of a member of their immediate family.

Gifts Law: Acceptance Ban

§ 112.3148(4), Fla. Stat.

Applies to:

- Reporting Individuals
- Executive & Judicial Branch Procurement Employees

Unsolicited Gifts from Restricted Donors:

- Valued \$0-\$25: They can accept. No disclosure required.
- Valued \$25.01-\$100: They can accept. Donor discloses on Form 30.
- Valued >\$100: They cannot accept.

Gifts Law: Everyone Else

§ 112.3148(8), Fla. Stat.

Applies to:

- Reporting Individuals
- Executive & Judicial Branch Procurement Employees

Gifts from Everyone Else (Not Relatives or Restricted Donors):

- **Valued \$0-\$100:** They can accept. No disclosure required.
- **Valued >\$100:** They can accept. Disclosure required on Form 9 by the end of the quarter following the quarter when the gift was accepted.

Gifts Law: Valuation

§ 112.3148(7), Fla. Stat. & Rule 34-13.500, F.A.C.

- Generally, a gift's value is the cost to the donor.
- Personal services: customary charge
- Event: total cost of the event divided by the number of invitees
- Transportation: round-trip is a single gift; valued at the same rate as a comparable commercial conveyance
- Lodging: consecutive nights are a single gift; \$44/night
- Food consumed at a single sitting: value of the meal
- Entrance fees/tickets: face value or event basis (above), whichever is greater.

What Do You Advise?

A City vendor invites Council Members to a Grand Opening for a hotel. The invite says, “FREE” and “Open to the Public.” There will be an all you can eat buffet, open bar, and live music...

What do you advise?

Decline, Accept, Get Value, Pay-Down, Purchase, Disclose, Call Ethics Office, I don't know?

Use smart phone, tablet, or computer to Participate Anonymously at **Slido.com**
Code is **904609**

What Do You Advise?

A Council Member is attending a conference out of town and a City vendor invites the Council Member to dinner with a group of other public officials.

What do you advise?

Decline, Accept, Get Value, Pay-Down, Purchase, Disclose, Call Ethics Office, I don't know?

Use smart phone, tablet, or computer to Participate Anonymously at **Slido.com**
Code is **904609**

What Do You Advise?

Your friend from college invites you to join them on their annual trip for several days in the Bahamas. The friend is not a City vendor or lobbyist.

What do you advise?

Decline, Accept, Get Value, Pay-Down, Purchase, Disclose, Call Ethics Office, I don't know?

Use smart phone, tablet, or computer to Participate Anonymously at **Slido.com**
Code is **904609**

What Do You Advise?

When the hometown team won the playoff game, Council Member Bernard asks a local bank President who has a suite for the season if he could get tickets for the next game in the series...

Can the Council Member accept the tickets they requested?

Decline, Accept, Get Value, Pay-Down, Purchase, Disclose, Call Ethics Office, I don't know?

Use smart phone, tablet, or computer to Participate Anonymously at **Slido.com**
Code is **904609**

What Do You Advise?

The night the City Council plans to hold the final vote on a City contract with a local company, the company sends a catered meal to the Green Room for the Council Members and staff to enjoy before the meeting...

What do you advise?

Decline, Accept, Get Value, Pay-Down, Purchase, Disclose, Call Ethics Office, I don't know?

Use smart phone, tablet, or computer to Participate Anonymously at **Slido.com**
Code is **904609**

Voting Conflicts

Voting Conflicts

§ 112.3143(3)(a), Fla. Stat.

Applies to:

- All county, municipal, and other local public officers (elected and appointed)

Prohibition: They cannot vote on any measure that will inure to their special private gain or loss or that they know will inure to the special private gain or loss of a relative, a business associate, or a principal by whom they are retained.

Factors that affect whether there is a special private gain/loss include “the size of the class” and whether the gain/loss is “remote and speculative.”

Voting Conflicts: Remedy

§ 112.3143(3)(a), Fla. Stat.

When a voting conflict is present:

- Prior to the vote being taken, publicly state to the assembly the nature of the officer's interest in the matter from which he or she is abstaining from voting;
- Abstain from the vote; **and**
- File a voting conflict memorandum (Form 8B) within 15 days of the vote.

Additionally, appointed officers must disclose their voting conflict before they participate in the vote by making an oral disclosure at the meeting or by filing their Form 8B in advance.

What Do You Advise?

There is legislation pending before City Council that would award your employer funding/a contract from the City.

What would you do?

Vote, Abstain Vote/Discussion, Participate in Discussion Only, Call Ethics Office/OGC, I don't know?

Use smart phone, tablet, or computer to Participate Anonymously at **Slido.com**
Code is **904609**

What Do You Advise?

City Council is considering legislation to establish a new program to improve tourism. Your primary employer is one of the few organizations in town that works privately on this issue. There is no funding attached to this bill, but your employer may apply for funding that will be approved for the program in the future...

What would you do?

Vote, Abstain Vote/Discussion, Participate in Discussion Only, Call Ethics Office/OGC, I don't know?

Use smart phone, tablet, or computer to Participate Anonymously at **Slido.com**
Code is **904609**

Conflicts of Interest

Doing Business with One's Agency

§ 112.313(3), Fla. Stat.

Applies to:

- All public officers and employees.

Prohibitions:

- In their public capacity, they may not buy/rent/lease any realty/goods/services for their agency from a business in which they, their spouse, or their child are an officer, partner, director, or proprietor, or in which they or their spouse/child own more than 5%.
- In their private capacity, they may not sell/rent/lease any realty/goods/services to their agency or to any agency of their political subdivision.

Conflicting Employment or Contractual Relationships

§ 112.313(7)(a), Fla. Stat.

Applies to:

- All public officers and employees.

Prohibitions:

- They may not have employment or a contractual relationship with a business entity that is regulated by or is doing business with their agency.
- They may not have any employment or contractual relationship that will create a continuing or frequently recurring conflict between their private interests and the performance of their public duties or that would impede the full and faithful discharge of their public duties.

Conflicts of Interest Self-Assessment for Elected Officials



This tool is provided by the City of Jacksonville's Office of Ethics, Compliance and Oversight as a guide for understanding state ethics conflicts laws. Conflicts happen all the time, but the only way to address them is to work with the Ethics Office and OGC by providing the information requested below.

Florida Statutes sections 112.313(3), 112.313(7) and 112.3143 identify potential conflicts for City Officials. that may require additional action by officials if a conflict exists.

For purposes of this assessment, the term "Independent Agencies" includes:

1. Duval County Public Schools,
2. Jacksonville Aviation Authority,
3. Jacksonville Electric Authority,
4. Jacksonville Finance and Housing Authority,

Local Disclosures

- Financial Interest in City bid or contract (Ordinance Code §§ 126.110 & 602.406)
- Council Member/Spouse/Child employed by non-profit receiving City funding--
Council Member must provide affidavit and supporting documents to Ethics Office on/before deadline (Ordinance Code § 602.413)

What Do You Advise?

A Council Member is preparing to have some work done on their private home. A contractor, who also has several contracts with the City, has offered to do the work at a discount.

Is this a Conflict of Interest?

Use smart phone, tablet, or computer to Participate Anonymously at **Slido.com**
Code is **904609**

What Do You Advise?

A Council Member has been asked to sit on a Board of Directors for an organization that is receiving City funding.

Is this a Conflict of Interest?

Use smart phone, tablet, or computer to Participate Anonymously at **Slido.com**
Code is **904609**

What Do You Advise?

A Council Member is a member of a local professional organization that receives City funding.

Is this a Conflict of Interest?

Use smart phone, tablet, or computer to Participate Anonymously at **Slido.com**
Code is **904609**

In-Office & Post-Office Holding Restrictions on Representation and Lobbying

Representation Ban

Post-Office Lobbying Ban

In-Office Lobbying Ban

Representation Ban

§ 112.313(14), Fla. Stat.

Applies to:

- All elected local officers.

Prohibition:

Cannot personally represent another person or entity for compensation before the government body or agency of which the person was an officer for a period of 2 years after vacating that office.

- The “government body or agency” of an elected officer of a county/municipal governing body is the governing body, the chief administrative officer, and their immediate support staff.

Post-Office Lobbying Ban

Art. II, Section 8(f)(1)-(2), Fla. Const.

Applies to:

- . . . a county commissioner, **a county officer pursuant to Article VIII or county charter**, a school board member, a superintendent of schools, **an elected municipal officer**, an elected special district officer in a special district with ad valorem taxing authority, . . .

Prohibition:

“A public officer shall not lobby for compensation on issues of policy, appropriations, or procurement for a period of **six years** after vacation of public position, as follows . . .

. . . A county commissioner, a county officer pursuant to Article VIII or county charter, a school board member, a superintendent of schools, an elected municipal officer, or an elected special district officer in a special district with ad valorem taxing authority **shall not lobby his or her former agency or governing body.**”

In-Office Lobbying Ban

Art. II, Section 8(f)(1) & (3), Fla. Const.

Applies to:

- . . . a county commissioner, **a county officer pursuant to Article VIII or county charter**, a school board member, a superintendent of schools, **an elected municipal officer**, an elected special district officer in a special district with ad valorem taxing authority,

Prohibition:

“A public officer shall not lobby for compensation on issues of policy, appropriations, or procurement before the federal government, the legislature, any state government body or agency, or any political subdivision of this state, during his or her term of office.”

Anti-Nepotism

Anti-Nepotism

§ 112.3135(2)(a), Fla. Stat.

Applies to:

- An officer or employee with the authority to appoint, employ, promote, or advance individuals or to recommend individuals for appointment, employment, promotion, or advancement in connection with employment in an agency, including the authority as a member of a collegial body.

“Relative” means: father, mother, son, daughter, brother, sister, uncle, aunt, first cousin, nephew, niece, husband, wife, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half brother, or half sister.

Anti-Nepotism

§ 112.3135(2)(a), Fla. Stat.

Prohibition:

A public official may not appoint, employ, promote, or advance, or advocate for appointment, employment, promotion, or advancement, in or to a position in the agency in which the official is serving or over which the official exercises jurisdiction or control any individual who is a relative of the public official.

Note: If the collegial body acts, the officer is charged with acting, even if he or she abstains.

Exception: Does not apply to appointments to boards other than those with land-planning or zoning responsibilities in those municipalities with less than 35,000 population.

Exception: Does not apply to persons serving in a volunteer capacity who provide emergency medical, firefighting, or police services.

What Do You Advise?

Your cousin is a world-renowned expert on the topic of downtown development. The Council President wants to appoint your cousin to the Downtown Investment Authority.

Can you vote on the appointment of your cousin to the DIA?

Use smart phone, tablet, or computer to Participate Anonymously at **Slido.com**
Code is **904609**

Financial Disclosure and Form 6

Financial Disclosure

GENERAL EXPLANATION

- Reminds public officials of financial interests that may conflict with their duties.
- Citizens can monitor potential conflicts.
- Deters official actions that might cause a conflict.
- Instills public confidence in government.
- Anyone required to file financial disclosure is also a “reporting individual” subject to:
 - the Gifts Law (§ 112.3148)
 - the Honoraria Law (§ 112.3149)
 - the Expenditure Ban (for Executive Branch “reporting individuals” only) (§ 112.3215(6))
- Many concepts applicable to both Form 6 and Form 1.
 - For example, concepts pertaining to Form 6 “Assets” are directly applicable to Form 1 “Intangible Personal Property.”

Form 6: At a Glance

GENERAL EXPLANATION

- Approx. 2,500 annual Form 6 filers statewide
 - Constitutional Officers
 - Judges
 - Members of an expressway authority, transportation authority, bridge authority, toll authority, or expressway agency
 - Members of the Commission on Ethics
 - Elected municipal officers*
 - Mayors*
- Candidates for these positions also file to qualify for election.
- Filed annually by 7/1
- Penalty-free grace period until 9/1
- \$25/day fine for late filing
 - \$1,500 maximum (60 days late)
- Form 6 requires specific values for most disclosures.

* Presently, elected municipal officers and mayors file Form 1 due to the pendency of a temporary injunction. Loper, et al. v. Lukis, et al. (Fla. 2nd Circ. Ct. Leon County) (Case Number 2024 CA 000283).

Form 6: Net Worth Section

GENERAL EXPLANATION

- Snapshot of filer's net worth as of a date chosen by the filer
 - 12/31 or a more recent date
- This chosen date will also be used for the Assets section and the Liabilities section.
- **Correct Disclosure:** Sum all assets, subtract all liabilities.
- **Incorrect Disclosure:** Sum all disclosed assets, subtract all disclosed liabilities



Share with CPA or Attorney

How-to

Share with CPA/Attorney

FAQs

Print Form

Delete Filing

Name: 253027 - Steven John Zuilkowski Filing Status: In Progress



2024 Form 6-Full and Public Disclosure of Financial Interests

General Information **Net Worth** Assets Liabilities Income Interests in Specified Businesses Uploads Training Review Sign & Print

[Reporting Period](#) > Net Worth

Navigation Bar

First, you must report your Net Worth as of December 31, 2024, or a more current date.
You will use this date to value your assets and liabilities later in this disclosure.
What date would you like to use to report your Net Worth?

Instructions Tab

12/31/2024



BACK



NEXT



Resources

- [View Past Filings](#)
- [Print Instructions](#)
- [Financial Disclosure Opinions](#)

Net Worth:

[Required by Art. II, s. 8(a)(1)(1), Fla. Const.]

Report your net worth as of December 31, 2024, or a more current date, and list that date. This should be the same date used to value your assets and liabilities. In order to determine your net worth, you will need to total the value of all your assets and subtract the amount of all of your liabilities. Simply subtracting your liabilities from your assets will not result in an accurate net worth figure in most cases.

To total the value of your assets, add:

1. The aggregate value of household goods and personal effects, as reported in the Assets section of this form;
2. The value of all assets worth over \$1,000, as reported in the Assets section; and,
3. The total value of any assets worth less than \$1,000 that were not reported or included in the category of "household goods and personal effects."

To total the amount of your liabilities, add:

1. The total amount of each liability you reported in the Liabilities section of this form, except for any amounts listed in the "joint and several liabilities

Share with CPA or Attorney

How-to

Print Form

Delete Filing

Name: 253027 - Steven John Zuilkowski Filing Status: In Progress

2024 Form 6-Full and Public Disclosure of Financial Interests

Instructions

General Information

Net Worth

Assets

Liabilities

Income

Interests in Specified Businesses

Uploads

Training

Review

Sign & Print

[Reporting Period](#) > Net Worth

First, you must report your Net Worth as of December 31, 2024, or a more current date.
You will use this date to value your assets and liabilities later in this disclosure.
What date would you like to use to report your Net Worth?

Instructions Tab

12/31/2024



BACK



NEXT



Share with CPA or Attorney

How-to

Print Form

Delete Filing

Name: 253027 - Steven John Zuilkowski Filing Status: **In Progress**



2024 Form 6-Full and Public Disclosure of Financial Interests

General Information **Net Worth** Assets Liabilities Income Interests in Specified Businesses Uploads Training Review Sign & Print

[Reporting Period](#) > Net Worth

First, you must report your Net Worth as of December 31, 2024, or a more current date.
You will use this date to value your assets and liabilities later in this disclosure.
What date would you like to use to report your Net Worth?

12/31/2024



BACK



NEXT

Choose a Date

12/31 or a more recent date.

The date chosen here applies to the **Net Worth**, the **Assets**, and the **Liabilities** sections.



Share with CPA or Attorney

How-to

Print Form

Delete Filing

Name: 253027 - Steven John Zuilkowski Filing Status: In Progress



2024 Form 6-Full and Public Disclosure of Financial Interests

General Information **Net Worth** Assets Liabilities Uploads Training Review Sign & Print

Reporting Period > [Net Worth](#)

To total the value of your assets, add:

- (1) The aggregate value of your household goods and personal effects, which is an amount you will be reporting in the "Assets" section of this filing:
AND
(2) The aggregate value of all other assets you possess (even if an asset has a small monetary value and even if you are not asked to report the asset in this filing, be sure to include its value in your calculation)

Please a negative number.

Your Net Worth is the total value of **ALL YOUR ASSETS** minus the total value of **ALL YOUR LIABILITIES**.

Note that in most cases, simply subtracting the liabilities from the assets you report later in this disclosure *will not* accurately reflect your Net Worth, because only certain assets and liabilities are reportable.

Please click the instructions tab for specific guidance on calculating your Net Worth.

\$ Please enter a number

You can enter a numeric value, including a negative value.

Red Links

Hover to get definitions and tips

Enter a Net Worth

This is the sum of ALL assets, minus ALL liabilities.

Common Mistake

This is not the sum of DISCLOSED assets minus DISCLOSED liabilities.

Form 6: Assets

GENERAL EXPLANATION

- Two disclosures in this section:
 - Household goods & personal effects
 - Itemized assets
- **Household Goods & Personal Effects:** Disclose one number as the aggregated value of:
 - Jewelry
 - Stamp/Coin/Gun collection
 - Art objects
 - Household equipment
 - Furnishings
 - Clothing
 - Vehicles for personal use (owned or leased)



Share with CPA or Attorney How-to

Print Form Delete Filing

Name: 253027 - Steven John Zuilkowski Filing Status: In Progress

2024 Form 6-Full and Public Disclosure of Financial Interests

General Information Net Worth Assets Liabilities Income Interests in Specified Businesses Uploads Training Review Sign & Print

Household Goods > Household Goods Amount > Real Property > Intangible Assets

What is the TOTAL value of your household goods and personal effects?

\$ Please enter a number

Household Goods
& Personal Effects

BACK



NEXT

Form 6: Assets

GENERAL EXPLANATION

- **Individually Disclosed Assets:**
Disclose all assets owned exceeding \$1,000 in value on the date used in the Net Worth section
 - Tangible/Intangible
 - Solely owned/Jointly owned
- An asset is any interest that can be sold/alienated. CEO 78-95, CEO 23-8.
- **Do not disclose** assets not owned by the filer.
 - Spouse's/Child's assets
- Jointly owned assets are valued at the filer's proportion of ownership
 - Except jointly-owned bank accounts. (Value at 100%.) CEO 82-30.
- Property owned as tenants by the entirety is valued at 100%. CEO 82-30.



Share with CPA or Attorney How-to

Print Form Delete Filing

Name: 253027 - Steven John Zuilkowski Filing Status: In Progress

2024 Form 6-Full and Public Disclosure of Financial Interests

General Information Net Worth Assets Liabilities Income Interests in Specified Businesses Uploads Training Review Sign & Print

Household Goods > Household Goods Amount > Real Property > Real Property Amount > Intangible Assets

Load Prior Year Data

Import Data From a .CSV File

Load Prior Year Data Clear All

Import from CSV CSV File Template How-to

DESCRIPTION OF ASSET	VALUE OF ASSET	ACTIONS
Please enter a description	\$ Please enter a number	

I have additional documents to attach for reporting Real Property.

Manually Enter Data

Upload a PDF

Add Lines for Additional Disclosures

+ Add Item

BACK

NEXT

Form 6: Assets

EXAMPLES OF SPECIFIC DISCLOSURES

- **Real Property**

- Description must be location information sufficient to find it (street address, parcel number, longitude/latitude, etc.)
- Valued at market value of property appraiser or some other more-reasonable number the filer can support as the actual value.
- Even foreign property. CEO 87-84.

- **Bank Accounts**

- All accounts at one bank can be aggregated in value & description.
- E.g., “Bank Accounts at Bank of America” & “ \$25,000.” CEO 82-30.

- **Stocks**

- Described as the name of the company. Valued as of date used. CEO 12-10, Q1.

- **Mutual Funds & ETFs**

- Described as the full name of the fund. Valued as of date used. See, generally, CEO 11-11, Q2.

- **IRA/401(k)/Investment Account**

- Never disclose! Though the investments inside can be sold, the account itself cannot be sold, so it isn’t an asset. CEO 12-10.

Form 6: Assets

EXAMPLE OF AN INVESTMENT ACCOUNT

- We have an **IRA** at **Fidelity**.
- In that **IRA**, we have the following investments:

FIDELITY IRA	VALUE
Oracle Stock (ORCL)	\$600
Home Depot Stock (HD)	\$10,000
Fidelity 500 Index Fund (FXAIX)	\$60,000
Vanguard S&P 500 ETF (VOO)	\$30,000
TOTAL VALUE →	\$100,600

“How do we disclose this?”

- **Choice A**
 - “Fidelity IRA” & “\$100,600”
- **Choice B**
 - “Home Depot Stock” & “\$10,000”
 - “Fidelity 500 Index Fund” & “\$60,000”
 - “Vanguard S&P 500 ETF” & “\$30,000”

The Answer is Choice B.

- The account is not an asset and is not disclosed.
- However, each individual asset over \$1,000 is disclosed.

Form 6: Assets

INTERESTS IN TRUSTS

- **Beneficiary of a Trust**

- Beneficial interest in a trust is an asset and must be disclosed if the value exceeds \$1,000. CEO 78-1, CEO 83-3, CEO 23-8.
- If there is a spendthrift clause preventing selling, alienating, or encumbering that interest, then it is not an asset and does not have to be disclosed. CEO 23-8, Q1 and note 3.
- When the contents/value of the trust is unknown to the filer, “there is an implied obligation on the part of the filer to make a reasonable inquiry regarding his or her own interests.” CEO 24-4.

- **Grantor of a Revocable Trust**

- Must disclose assets as their own. CEO 78-37, Q4.

- **Grantor of an Irrevocable Trust**

- Do not disclose because Grantor does not own and cannot access the assets.

- **Trustee of a Trust**

- Do not disclose because Trustee does not own and cannot access the assets. CEO 78-95.

Form 6: Liabilities

GENERAL EXPLANATION

- Disclose all liabilities exceeding \$1,000 in value
 - Name & address of the creditor and the amount of the debt.
 - Mortgages, student loans, car payments, etc.
- Disclose the outstanding debt as of the date chosen in the Net Worth section.
- **Do Not Disclose:**
 - Credit card and retail installment accounts;
 - Taxes owed (unless the taxes have been reduced to a judgment);
 - Indebtedness on a life insurance policy owed to the company of issuance; or
 - Contingent liabilities. CEO 86-40.
- However, factor these amounts into the filer's Net Worth.



[Share with CPA or Attorney](#) [How-to](#)

[Print Form](#) [Delete Filing](#)

Name: 253027 - Steven John Zuilkowski Filing Status: In Progress

2024 Form 6-Full and Public Disclosure of Financial Interests

Instructions

- General Information
- Net Worth
- Assets
- Liabilities
- Income
- Interests in Specified Businesses
- Uploads
- Training
- Review
- Sign & Print

Personal Liabilities > [Personal Liabilities Amount](#) > Joint Liabilities

Provide the following information concerning any personal liabilities exceeding \$1,000 on the reporting date.
If you have multiple liabilities to report, click the + to add more lines.

[Load Prior Year Data](#) [Clear All](#)

[Import from CSV](#) [CSV File Template](#) [How-to](#)

NAME OF CREDITOR	ADDRESS OF CREDITOR	AMOUNT OF LIABILITY	ACTIONS
<input type="text" value="Please enter a creditor name"/>	<input type="text" value="Please enter a creditor address"/>	<div><div>\$</div><input type="text" value="Please enter a number"/></div>	<div><div></div></div>

[+ Add Item](#)

☐ I have additional documents to attach for reporting Personal Liabilities.

BACK



NEXT

Form 6: Income

PRIMARY SOURCES OF INCOME

- Two disclosures in the Income section:
 - Primary Sources of Income
 - Secondary Sources of Income
- Uploading a federal income tax return, with all schedules and attachments, will satisfy the filing requirement for the entire Income section. § 112.3144(6)(c)1., F.S.
- At all times, “income” refers to anything that would be considered “**gross income**” for purposes of federal income taxes.

Primary Sources of Income

- All the sources of gross income to the filer personally (*before* deductions and exemptions) exceeding \$1,000.
 - Wages, capital gains, sweepstakes wins, etc.
- Do not disclose spouse’s income.



Share with CPA or Attorney How-to

Print Form Delete Filing

Name: 253027 - Steven John Zuilkowski Filing Status: In Progress

2024 Form 6-Full and Public Disclosure of Financial Interests

General Information Net Worth Assets Liabilities Income Interests in Specified Businesses Uploads Training Review Sign & Print

Primary Income > Primary Income Amount > Secondary Income

Upload tax return

the source and amount of income that exceeded \$1,000 during the disclosure period.

In lieu of reporting income, you may instead attach a complete copy of your 2024 federal income tax return, including all W2s, schedules, and attachments.

Filers must redact any social security numbers, account numbers, or PINS, and taxpayer identification numbers, before attaching returns, as the law requires these documents to be posted to the Commission's website.

Load Prior Year Data

Import Data
From a .CSV File

I elect to file a copy of my 2024 federal income tax return and all W2s, schedules, and attachments.

If you check this box and attach a copy of your tax return, you do not need to complete the remainder of the income section of the form.

Load Prior Year Data Clear All

Import from CSV CSV File Template How-to

NAME OF SOURCE OF INCOME EXCEEDING \$1,000

ADDRESS OF SOURCE OF INCOME

AMOUNT

ACTIONS

Please enter a source name

Please enter a source address

\$ Please enter a number

+ Add Item

Manually Enter Data

Add Lines for
Additional
Disclosures

Upload a PDF

BACK

.....

61

NEXT

Form 6: Income

SECONDARY SOURCES OF INCOME

- **Secondary Sources of Income:**

- Not second jobs or outside employment.
- These are the major clients and customers of businesses owned by the filer.
- If the filer does not own a business, there are no secondary sources.

- **Confidential Legal Clients:**

- Disclose “Legal Client” in the fields if the disclosure would violate confidentiality or privilege under rules governing attorneys.
 - § 112.3144(6)(c)2., F.S.

Disclose a client/customer as a secondary source if:

- The filer owns more than 5% of a business;
- The filer received more than \$1,000 gross income from that business that year; **and**
- The business received more than 10% of its gross income that year from a particular client or customer.



Share with CPA or Attorney How-to

Print Form Delete Filing

Name: 253027 - Steven John Zuilkowski Filing Status: In Progress

2024 Form 6-Full and Public Disclosure of Financial Interests

General Information Net Worth Assets Liabilities Income Interests in Specified Businesses Uploads Training Review Sign & Print

Primary Income > Primary Income Amount > Secondary Income > Secondary Income Amount

Name of filer's business

List your secondary sources of income for the reporting period.
Click the instructions tab for examples of how to report secondary sources of income.
If you have multiple sources of income to be reported, use the + to add more lines.
If you have nothing to report, type N/A in all the fields.

Load Prior Year Data Clear All

Import from CSV CSV File Template How-to

NAME OF BUSINESS ENTITY

NAME OF MAJOR SOURCES OF BUSINESS' INCOME

ADDRESS OF SOURCE

PRINCIPAL BUSINESS ACTIVITY OF SOURCE

ACTIONS

Please enter business entity

Please enter business source

Please enter business address

Please enter business activity



+ Add Item

I have additional documents to attach for reporting Secondary Income.

Name of the client or customer

BACK



NEXT

Form 6: Annual Ethics Training

GENERAL EXPLANATION

• **Four-hour training requirement:**

- The Code of Ethics for Public Officers and Employees (Ch. 112, F.S.)
- The Sunshine Amendment (Art. II, s. 8, Fla. Const.)
- Public records laws
- Open meetings laws
- Curriculum: CEOs 13-15 & 13-24.
- 50-minute hours. CEO 13-15, Q3.

* Presently, elected municipal officers and mayors file Form 1 due to the pendency of a temporary injunction. Loper, et al. v. Lukis, et al. (Fla. 2nd Circ. Ct. Leon County) (Case Number 2024 CA 000283).

Who is required to certify training?

- Constitutional officers;
- Elected municipal officers*;
- Mayors*;
- Elected officers of independent special districts; and
- Those appointed to fill those vacancies if their service:
 - began on/before 3/31 of the year being disclosed [§ 112.3142(2)(f), F.S.]; and
 - continued through 12/31 [CEO 15-5].

Thank You

STEVE'S CONTACT INFO

You
complete
me.



Steven J. Zuilkowski

Deputy Executive Director & General Counsel
Florida Commission on Ethics

Zuilkowski.Steven@leg.state.fl.us

(850) 488-7864