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IN THE BROWARD COUNTY, FLORIDA, CHARTER SECTION 10.01
ENFORCEMENT HEARINGS FORUM

CAROL J. BREECE,
Broward County Inspector General,
Plaintiff,

CASE NO. EH-2026-002

V.

RAYMOND JAY NYHUIS,
Defendant

COMPLAINT

Plaintiff CAROL J. BREECE, the Inspector General in and for Broward County, Florida, by and through the undersigned counsel, files this Complaint against RAYMOND JAY (“RAY”) NYHUIS for a violation of Section 1-19 of the Broward County Code of Ordinances (“Broward Ethics Code”), as averred herein.

STATEMENT OF JURISDICTION

The Broward County Charter Section 10.01 Enforcement Hearings Forum has jurisdiction over this matter pursuant to Section 10.01.C.(2) of the Broward County Charter.

FACTS UPON WHICH THE PLAINTIFF IS ENTITLED TO RELIEF

1. Plaintiff is the Inspector General for Broward County.
2. At all times material to this Complaint, until on or about the filing of this

Complaint, Defendant served as a Council Member or Mayor of the Village of Lazy Lake, Florida (“the Village”), a municipality within Broward County, FL.

3. At all times material to this Complaint, Defendant was an “Elected Official” by being an “Municipal Official” as defined by Section 1-19 of the Broward County Code of Ordinances.
4. Pursuant to Section 1-19(d)(2) of the Broward County Code of Ordinances, Defendant was required to annually, on a calendar year basis, “attend or participate in a minimum of four (4) hours of continuing education training which addresses ethics topics including Section 8, Article II, of the Florida Constitution, the state's Code of Ethics for Public Officers and Employees (Chapter 112, Part III, Florida Statutes), Florida's public records and public meetings laws, and the ethical standards imposed by the Board pursuant to its authority under Section 112.326, Florida Statutes.”
5. Moreover, Section 1-19(d)(2) of the Broward County Code of Ordinances required Defendant to complete at least two of the required four hours of annual training in an interactive setting and certify having completed the annual training requirement in a form filed for public inspection within thirty (30) days after the end of each calendar year.
6. The deadline for an elected official to have filed a form, available for public

inspection, certifying completion of the annual training requirement for calendar year 2023 was January 30, 2024.

7. A form certifying Defendant's completion of the County's annual training requirement for calendar year 2023 was not filed for public inspection.
8. Neither the Village nor Defendant could produce any records demonstrating Defendant's attendance or participation in the required annual training for calendar year 2023, or his certification of completing said training.

RELEVANT LAW

Broward County Code of Ordinances (2023)

Sec. 1-19. - Code of ethics for elected officials. . . .

(a) *Statement of Policy.* It is the policy of Broward County that the Board of County Commissioners work for the benefit of the citizens of the County and elected officials of municipalities work for the benefit of the citizens of their respective municipalities. County Commissioners and elected municipal officials shall not receive any personal economic or financial benefit resulting from their service on their local governing bodies beyond legally authorized direct compensation. It is the responsibility of each County Commissioner and elected municipal official to act in a manner that promotes public trust and confidence in government with complete transparency and honesty in their services, and to avoid even the appearance or perception of impropriety.

(b) *Definitions.* For purposes of this Elected Official Code of Ethics: ...

(3) "*Elected Official*" means any member of the Board of County Commissioners and any Municipal Official as defined below.

(4) "*Filed for Public Inspection*" means either (a) that the form is completed legibly and is filed with the applicable governmental entity's chief administrative official or clerk, with a copy of the form or all information

contained thereon subsequently inputted into the applicable governmental entity's database, which database shall be searchable by internet; or (b) all required information, including an input date and electronic signature, is directly inputted into the database, which database is searchable by internet. .

..

(9) "*Municipal Official*" means any individual serving as a member of the governing body of a municipality within Broward County or serving as a municipal mayor within Broward County. . . .

(d) *Training and Education*. . . .

(2) Annual Training Requirement. Each Elected Official shall, on an annual basis, attend or participate in a minimum of four (4) hours of continuing education training which addresses ethics topics including Section 8, Article II, of the Florida Constitution, the state's Code of Ethics for Public Officers and Employees (Chapter 112, Part III, Florida Statutes), Florida's public records and public meetings laws, and the ethical standards imposed by the Board pursuant to its authority under Section 112.326, Florida Statutes. Training programs may be available through regional universities, municipal or local government organizations, or through state or regional Bar associations. Commencing January 1, 2017, the four (4) hour annual training requirement shall be met on a calendar-year basis, and at least two (2) hours of annual training during each calendar year shall be received in an interactive setting (group or individual). Each Elected Official shall annually certify that he or she has met this requirement in a form filed for public inspection within thirty (30) days after the end of each calendar year. . . .

COUNT ONE

In calendar year 2023, Defendant RAY NYHUIS, while a council member of the Village of Lazy Lake, Broward County, Florida, failed to 1) attend or participate in a minimum of four (4) hours of continuing education which addresses ethics topics including Section 8, Article II, of the Florida Constitution, the state's Code of Ethics for Public Officers and Employees (Chapter 112, Part III, Florida Statutes),

Florida's public records and public meetings laws, and the ethical standards imposed by the Board of County Commissioners, including at least two (2) hours in an interactive setting, and 2) failed to certify that he had met such requirement in a form filed for public inspection within thirty (30) days after the end of calendar year 2023, in violation of Section 1-19(d)(2) of the Broward County Code of Ordinances.

DEMAND FOR JUDGMENT FOR RELIEF

WHEREFORE, Plaintiff demands judgment against Defendant RAY NYHUIS for one violation of Section 1-19(d)(2) of the Broward County Code of Ordinances, and requests that the Hearing Officer impose a monetary fine of \$250.00.

Respectfully submitted this 6th day of May 2026.

CAROL J. BREECE
INSPECTOR GENERAL

/s/ Amy E. Drever

Amy E. Drever

Florida Bar No. 111958

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