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

CASE NO. EH-2026-001

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

V.

ABIODUN AJAYI,
Defendant.

_____ /

JOINT MOTION FOR ORDER ACCEPTING AND RATIFYING AGREEMENT

COMES NOW the parties, by and through their undersigned counsel,
and hereby jointly request this Honorable Court to enter an Order accepting
and ratifying the Agreement reached in this case. In making this motion, the
parties state:

1. On April 15, 2026, the parties reached an Agreement to settle this matter. A copy of the original agreement is attached as Exhibit A.
2. The original Agreement has been filed separately with the Agency Clerk.
3. By the terms of the Agreement, the parties agreed to request that the Hearing Officer assigned to the case review, accept, and ratify the Agreement.

4. Accordingly, the parties respectfully request this Honorable Court to accept and ratify the Agreement and all the terms in it, and further to execute any and all orders that are necessary to give effect to its terms.
5. The parties have conferred and this motion is agreed to by both parties.

CONCLUSION

Thus, for the reasons set forth herein, the parties respectfully request that this joint motion be GRANTED.

Respectfully submitted this 15th day of April, 2026 by:

/s/ Katherine Y. McIntire
Katherine Yzquierdo McIntire
Broward Office of the Inspector General
1 N. University Drive, Suite 111
Plantation, FL 33324
(954) 357-7873

CERTIFICATE OF SERVICE

I certify that a copy hereof has been furnished to Larry S. Davis, Esq., by email to: larry@larrysdavislaw.com on this 15th day of April, 2026.

/s/ Katherine Y. McIntire
Katherine Yzquierdo McIntire
Attorney for Plaintiff

EXHIBIT A

IN THE BROWARD COUNTY, FLORIDA, CHARTER SECTION 10.01
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CASE NO. EH-2026-001

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

V.

ABIODUN AJAYI,
Defendant.

_____ /

AGREEMENT

CAROL J. BREECE, the Inspector General in and for Broward County, Florida (“the INSPECTOR GENERAL”), by and through undersigned counsel, and ABIODUN AJAYI, by and through her legal representative, Larry Davis, Esq., hereby enter into this Agreement to settle case EH-26-001 filed in Broward County, Florida, pursuant to Section 10.01 of the Broward County Charter.

1. This Agreement, consisting of 5 pages, is the entire agreement of the INSPECTOR GENERAL and AJAYI regarding its subject matter. There are no promises, terms, conditions or obligations other than those contained in this Agreement. This Agreement supersedes any and all previous communications, representations, and verbal or written agreements between the parties.

2. The parties agree that the Broward County, Florida, Charter Section 10.01 Enforcement Hearings Forum has the authority to enforce the provisions of this Agreement.

3. AJAYI understands and agrees that this Agreement has the same force and effect as if an Administrative Hearing Officer had (1) found the below facts to be proved at an evidentiary hearing and (2) made the legal conclusions necessary to find her liable for violating Section 26-16(a) of the Broward County Code of Ordinances.

4. AJAYI understands and agrees that she is hereby waiving her rights under Broward County Charter Section 10.01 and her right to appeal any decision of the Administrative Hearing Officer to the Circuit Court, so long as the Hearing Officer accepts and ratifies this Agreement.

5. AJAYI understands and agrees that if enforcement of this Agreement is necessary, she shall be responsible for all fees and costs associated with such enforcement.

6. By signing this Agreement, AJAYI acknowledges that she is doing so freely, voluntarily and without duress; that she is competent to enter this Agreement; and that she has fully and completely read and fully understands the terms and conditions of this Agreement.

7. The parties agree that settlement of this matter in the manner described

above is just and in the best interest of AJAYI and the residents of Broward County.

STIPULATED FACTS

8. Plaintiff is the Inspector General for Broward County.

9. Between on or about June 16, 2023, and on or about July 11, 2024, Defendant was a Broward County employee.

10. At all relevant times, Defendant was seeking election as Broward County Tax Collector.

11. On or about March 29, 2024, AJAYI, who was seeking elected public office, appeared on the “Time Out 360” podcast from her County office during her working hours as a County employee. Towards the end of her appearance, AJAYI answered the host’s questions about the changes she would make in the office if she were elected.

12. Between on or about June 16, 2023, and on or about July 11, 2024, AJAYI, who was seeking elected public office, used her County email address to exchange electioneering emails between her personal and campaign email addresses during her working hours as a County employee.

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AGREED TERMS

The parties' agreed-upon terms follow:

13. AJAYI, who was at all relevant times seeking elected public office, admits liability for the purposes of this settlement for violating two counts of Broward County Code Section 26-16(a) as described in Paragraphs 11 and 12 of this Agreement.

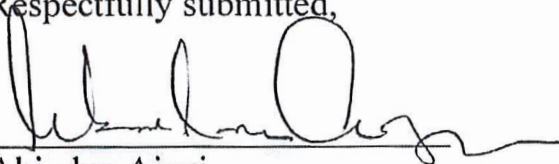
14. AJAYI agrees to pay a total fine of \$4,000, payable to Broward County Board of County Commission for the Violations specified in Paragraphs 11 and 12 of this Agreement within thirty (30) days of the date that the Hearing Officer accepts and ratifies this Agreement.

15. The parties jointly agree to request the Hearing Officer to accept and ratify this Agreement and execute the Orders necessary to effect it.

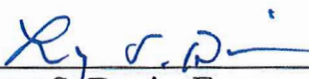
16. If the Hearing Officer does not accept and ratify this Agreement, this Agreement will no longer have any force or effect, and the INSPECTOR GENERAL and AJAYI will each be at liberty to take any action she could have taken in the absence of this Agreement.

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Respectfully submitted,



Abiodun Ajayi
C/O Larry S. Davis, Esq.
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larry@larrysdavislaw.com



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_____ /

ORDER APPROVING SETTLEMENT AGREEMENT,
RETAINING JURISDICTION TO ENFORCE ITS TERMS AND
CANCELLING FINAL HEARING

This cause came before the undersigned Hearing Officer on the Parties' Joint Motion for Order Accepting and Ratifying Agreement, and the Hearing Officer having reviewed the Motion, the Agreement and being otherwise fully advised in the premises, it is Ordered as follows:

1. The parties' Joint Motion is Granted and the Agreement executed by the parties is ratified and approved by the Hearing Officer. The parties are directed to comply with the terms of their Agreement and the Hearing Officer retains jurisdiction to enforce the Agreement.

2. The Final Hearing scheduled for May 4, 2026, and May 5, 2026, is cancelled and this matter is now concluded, except for any motions/proceedings brought to enforce compliance with the parties' Agreement.

Done and Ordered on this ____ day of April, 2026.

Hearing Officer

Copies to:

Katherine Y. McIntire, Esq., Counsel for Plaintiff

Larry Davis, Esq., Counsel for Defendant