
From: Diaz-Greco, Gilma M. (COE)
Sent: Friday, January 09, 2015 2:33 PM
To: Sanchez, Rodzandra (COE)
Subject: Gerald Sanchez, Assistant Miami-Dade County Attorney - Gifts, Exploitation INQ 15-03

INQ 15-03

From: Centorino, Joseph (COE)
Sent: Monday, January 05, 2015 5:45 PM
To: Diaz-Greco, Gilma M. (COE)
Subject: Gerald Sanchez, Assistant Miami-Dade County Attorney - Gifts, Exploitation

Gerald Sanchez, Assistant Miami-Dade County Attorney, inquired regarding whether it would constitute a violation of Section 2-11.1 of the Miami-Dade County Conflict of Interest and Code of Ethics for a County Commissioner to utilize his/her County website to solicit donations to a private non-profit organization dedicated to supporting a non-discrimination policy recently adopted by the County Commission. I advised that it would not be a violation of Section 2-11.1((e)(3) for a solicitation by a Commissioner for such a cause provided that the organization in question is a qualified Section 501(c)(3) non-profit organization, thereby invoking the exemption under Section 2-11.1((e)(2)(g), assuming, of course, that neither the Commissioner nor his/her staff was receiving any compensation as a result of the solicitation. Also, given the County's explicit adoption of the non-discrimination policy, there would be a sufficient governmental purpose served by the solicitation that the action would not constitute an Exploitation of Official Position pursuant to Section 2-11.1(g).

Joseph M. Centorino

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