Sanchez, Rodzandra (COE)

From: Diaz-Greco, Gilma M. (COE)

Sent: Wednesday, October 19, 2016 9:43 AM

To: Sanchez, Rodzandra (COE)

Subject: Gerald Sanchez, Assistant County Attorney, Miami-Dade County (Gifts) INQ 16-237

INQ 16-237 Sanchez

From: Centorino, Joseph (COE)

Sent: Tuesday, October 18, 2016 5:09 PM

To: Turay, Radia (COE) <Radia.Turay@miamidade.gov>; Perez, Martha D. (COE) <perezmd@miamidade.gov>; Diaz-

Greco, Gilma M. (COE) < Gilma. Diaz-Greco@miamidade.gov>

Subject: INQ 16-237 Gerald Sanchez, Assistant County Attorney, Miami-Dade County (Gifts)

Gerald Sanchez, Assistant County Attorney for Miami-Dade County, inquired regarding the ethics prohibitions or requirements in regard to a County employee buying tickets priced at \$150 each to a charitable fundraiser and providing those tickets to County colleagues of the employee. I advised Mr. Sanchez that I did not see any prohibition against the purchase of the tickets and the presentation of them as gifts to fellow employees, assuming, of course, that there was no connection between the gifts and any action that might be taken by the donor employee in connection with the employment of the recipients. However, if the value of the ticket, after the deduction of the amount that would be going to the organization for its charitable purposes, were to exceed \$100, then the recipient County employees would be required to file disclosure of such gifts under Section 2-11.1(e)(4) of the Ethics Code.

Joseph M. Centorino

Executive Director and General Counsel Miami-Dade Commission on Ethics and Public Trust 19 W. Flagler Street, Suite 820 Miami, FL 33130

Tel: (305) 579-2594 Fax: (305) 579-0273 ethics.miamidade.gov

