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INQ 16-23

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**From:** Centorino, Joseph (COE)  
**Sent:** Thursday, January 28, 2016 11:05 AM  
**To:** Perez, Martha D. (COE); Diaz-Greco, Gilma M. (COE)  
**Subject:** INQ 16-23 Tiffany Britton, Esq., Legal Advisor, City of Miami Parking Authority (Travel Expenses, Gifts)

Tiffany Britton, Esq., legal advisor to the City of Miami Parking Authority, inquired concerning whether the CFO for the Parking Authority could accept paid expenses from a Parking Authority vendor for travel and hotel expenses for her to do a presentation at an upcoming conference regarding authority issues within her area of expertise. I advised Ms. Britton that, pursuant to Section 2-11.1(w) of the County Ethics Code, that individual could not accept paid travel or travel-related expenses from a vendor unless the Parking Authority Board, a semi-autonomous agency in the City, waived the prohibition in that section. I also advised her that she should consider the prohibition under Section 2-613 regarding the acceptance by any employee of gifts from an agency contractor unless the gift is given for the use and benefit of the City, as well as the prohibition under Section 112.3148, Florida Statutes, prohibiting gifts over \$100 from agency contractors unless the gift is accepted on behalf of the governmental entity. The nature of the the conference and potential benefit to the agency of the CFO's attendance should be weighed in such consideration.

*Joseph M. Centorino*

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