

## Sanchez, Rodzandra (COE)

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Monday, January 23, 2017 1:48 PM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** Maurice Pierre, RER (Travel Expenses) INQ 17-16  
**Attachments:** INQ 12-229 Johnson.pdf

INQ 17-16 Pierre

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**From:** Ethics (COE)  
**Sent:** Monday, January 23, 2017 1:37 PM  
**To:** Pierre, Maurice (RER) <Maurice.Pierre@miamidade.gov>  
**Cc:** Turay, Radia (COE) <Radia.Turay@miamidade.gov>; Perez, Martha D. (COE) <perezmd@miamidade.gov>; Diaz-Greco, Gilma M. (COE) <Gilma.Diaz-Greco@miamidade.gov>; Sanchez, Gerald (CAO) <Gerald.Sanchez@miamidade.gov>; Kirtley, Eddie (CAO) <Eddie.Kirtley@miamidade.gov>  
**Subject:** INQ 17-16 Maurice Pierre, RER (Travel Expenses)

Mr. Pierre:

Thank you for your question concerning the travel expense prohibition in Section 2-11.1(w) of the Ethics Code. You have questioned why the prohibition would apply, if a cruise line were offering prizes through a raffle that were won by a County employee despite the cruise line's being unaware of the recipient's being a County employee. This was essentially the question raised in INQ 12-229, which is attached to this response, which found that the prohibition did apply. There is no exception in Section 2-11.1(w) that would cover the receipt of a free cruise by a County employee through a raffle, although the County Commission could approve a waiver of the prohibition in any circumstances that it deemed appropriate for a waiver.. Any situation where a County employee was accepting paid travel by a County vendor would fall under the prohibition. I think you might easily understand the acceptance of a gratuitous cruise by someone employed at the Port, who might be involved in overseeing the performance of a cruise line, due to the possible impact on that person's objectivity. I understand that the prohibition might appear overly broad where the recipient of an anonymously bestowed raffle prize has nothing to do with the Port. Nonetheless, the way the provision is currently worded, it applies across the board to paid travel or travel-related expenses provided by county vendors or service providers to County employees. Any changes in that section would have to approved by the County Commission.

Sincerely,

Joe Centorino

*Joseph M. Centorino*

Executive Director and General Counsel  
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**From:** Maurice Pierre [<mailto:pierrm@miamidade.gov>]

**Sent:** Friday, January 20, 2017 8:57 AM

**To:** Ethics (COE) <[ethics@miamidade.gov](mailto:ethics@miamidade.gov)>

**Subject:** Cruising

In the situation of the cruises, if the employees entered the raffle on their own time as regular citizens, and not county employees, and the cruise line offering the prizes had no idea that they were county employees, why would they be unable to accept?