

Sanchez, Rodzandra (COE)

From: Diaz-Greco, Gilma M. (COE)
Sent: Monday, January 30, 2017 11:08 AM
To: Sanchez, Rodzandra (COE)
Subject: Ken Pyatt, Deputy Director, Miami-Dade County Aviation Department (Travel-related Expenses) INQ 17-17

INQ 17-17 Pyatt

From: Centorino, Joseph (COE)
Sent: Friday, January 27, 2017 5:13 PM
To: Pyatt, Ken (Aviation) <Kpyatt@miami-airport.com>; Murray, David M. (Aviation) <dmmurray@miami-airport.com>
Cc: Sanchez, Gerald (CAO) <Gerald.Sanchez@miamidade.gov>; Kirtley, Eddie (CAO) <Eddie.Kirtley@miamidade.gov>; 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 17-17 Ken Pyatt, Deputy Director, Miami-Dade County Aviation Department (Travel-related Expenses)

Ken,
You have inquired concerning whether you may accept partially paid travel-related expenses provided by a personal friend of yours, Carlos Rodriguez, in connection with his invitation to you to attend the upcoming wedding of his son in Costa Rica. Mr. Rodriguez is the principal for a developer, Driftwood Hotels, that you anticipate will be bidding on a hotel management contract at MIA. The gratuity to you involves the provision of lodging expenses during your stay in Costa Rica, which are being provided as a courtesy to all guests at the wedding.

Section 2-11.1(w) of the Miami-Dade Conflict of Interest and Code of Ethics Ordinance prohibits any County official or employee from accepting travel expenses, including transportation, lodging, meals, registration fees and incidentals from any County contractor, vendor, service provider, **bidder** or proposer. Such paid expenses could not be accepted, absent a waiver granted by a majority vote of the County Commission.

Inasmuch as Mr. Rodriguez is the principal of a firm that will be a bidder on a County contract at the airport, the complimentary lodging being provided would be covered by this ordinance. Therefore, it is my opinion that you may not accept such paid expenses from Mr. Rodriguez without obtaining a waiver from the County Commission.

I do not see any problem with your attending the wedding where you cover the reasonable value of the hotel expenses that would be charged for your stay, absent the gratuitous gesture by Mr. Rodriguez.

If you have any questions about this matter, please feel free to call me.

Sincerely,

Joe Centorino

Joseph M. Centorino
Executive Director and General Counsel
Miami-Dade Commission on Ethics and Public Trust
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