

Meyers, Robert (COE)

INQ 06-141

From: Meyers, Robert (COE)
Sent: Thursday, October 05, 2006 4:33 PM
To: Smith-York, Mary E. (COC)
Subject: RE: Soliciting Prizes for United Way Campaign

Ms. Smith-York,

I conferred with the Ethics Commission's staff general counsel and she and I agree that incentives to encourage employees to contribute to the United Way do not violate the county's Conflict of Interest and Code of Ethics ordinance. I have some reservations, however, about giving personnel administrative leave for making contributions and I suggest you consult with Employee Relations regarding that question.

Soliciting donors is acceptable as long as you solicit other businesses that do not conduct business with the County as well. The Ethics Commission has held repeatedly that general appeals or solicitations are acceptable, but solicitations that only target County vendors are prohibited.

If you have any further questions, please feel free to contact me at your convenience.

Sincerely,

Robert Meyers, Executive Director
Miami-Dade Commission on Ethics and Public Trust
(305) 350-0613

From: Smith-York, Mary E. (COC)
Sent: Wednesday, October 04, 2006 12:11 PM
To: Meyers, Robert (COE)
Subject: Soliciting Prizes for United Way Campaign

Mr. Meyers,

I am seeking guidance on what can and can't be done in terms of soliciting donations to be awarded as prizes for United Way contributions, both to staff for their contributions and as fundraising items.

We are a division of the Clerk of Courts Department and want to incite staff members to either begin or increase contributions to the United Way with rewards in the form of gift cards up to \$25 and/or administrative leave. Please advise if this complies with the County's policy on Ethics and if not, please inform how we might reward our staff for their contributions. Also, please advise whether soliciting donations from vendors is allowed when the donated item will be used for fundraising.

Thank you for your assistance.

Mary E. Smith-York
Clerk of Courts
Clerk of the Board Division
Phone: (305) 375-1598
Fax: (305) 375-2484