



June 30, 1999

Adrian Neiman, Esq.
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 2003 Cypress Creek Road
 Fort Lauderdale, FL 33309

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ARDYTH WALKER
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VIA FAX TRANSMISSION

Dear Ms. Neiman:

Our staff general counsel and I met today to consider the question you posed to us. Briefly, you indicated your company will be holding a government seminar on July 22, 1999 and you expect more than seventy-five (75) cities and counties to attend. Following the event, you have invited all the participants to attend a Florida Marlins baseball game, at no cost to the participants. You ask whether it is permissible for Miami-Dade County employees to attend the game and not violate the governing ethics ordinances.

First and foremost, the Dade County Code of Ethics and Conflict of Interest Ordinance applies to all full-time County employees and officials as well as municipal employees and officials in Miami-Dade County. Based upon the abovementioned facts, there is no violation for employees covered by this ordinance to attend the baseball game. Attending the game would amount to a gift under the ordinance as the ticket represents a transfer of something of value. The employee would have to disclose the cost of the ticket only if the ticket was valued at \$25 or more. If the ticket is valued at less than \$25, then reporting the gift is not required under the law.

Please understand this opinion carries no weight with respect to governmental employees outside the jurisdiction of Miami-Dade County. If you need additional information, do not hesitate to contact me

Sincerely,

Robert Meyers
 Executive Director

cc: Inquiry file