

**MIAMI-DADE COUNTY COMMISSION ON ETHICS & PUBLIC TRUST
REPORT OF INVESTIGATION**

#K13-049

Date Opened: 04/02/13

Date Closed: 04/25/13

Investigator: Sylvia Batista

On April 2, 2013, the COE received an e-mail from Commissioner Richard Chervony of North Bay Village. The e-mail informed that Vice Mayor Eddie Lim (Lim) and Commissioner Jorge Gonzalez (Gonzalez) attended the 12/10/12 Miami Heat vs. Atlanta Seahawks basketball game at the invitation of Asia Connect Media Corporation (“Asia Connect”). According to the e-mail, Asia Connect has been involved in presenting real estate investment opportunities in North Bay Village (NBV) to Turkish investors. Additionally, Mr. Cheng of Asia Connect has previously met with a former City Manager of NBV to do a promotion piece on NBV in their magazine. Commissioner Chervony states in his e-mail that Lim and Gonzalez did not file a gift disclosure form reporting the aforementioned gifts within the prescribed period of time for gifts received in December 2012.

The COE’s issue relates to a possible violation of the Conflict of Interest and Code of Ethics Ordinance Section 2-11.1(e) *Gifts*, and the North Bay Village Code of Ordinances, Section 38.05 *Gifts*.

Investigation:

04/04/13 – Raquel Lippman, Legal Counsel, The Miami Heat/Miami Heat Group –

The Miami Heat was contacted for information involving the price of the tickets allegedly given to Vice-Mayor Lim and Commissioner Gonzalez by Asia Connect.

Raquel Lippman (Lippman) advised that she did not find any record of a direct purchase of season tickets or suite by Asia Connect, Charles Cheng or Pedro Cheng. Lippman explained that sky boxes are actually suites where food and beverages are served and seating is available. Lippman said that Asia Connect could have received the tickets from the original suite holders, or Asia Connect could have bought the sky box tickets in the secondary market. Lippman said that the price of the ticket depends on the game, but it is safe to say that any ticket to any Miami Heat game costs more than \$25.

04/04/13 – Commissioner Jorge Gonzalez –

Gonzalez was contacted in connection with the aforementioned issue. Gonzalez acknowledged that he attended the Miami Heat basketball game on 12/10/12 at the invitation of Pedro Cheng (Cheng). Gonzalez has not filed a gift disclosure form reporting the subject gift. Gonzalez said that Cheng has been his friend for over 14 years. Gonzalez said that he was invited by Cheng, who was also invited by a friend who has use of the sky box that they used on that day. Gonzalez said that he invited Lim.

Gonzalez advised that Cheng works for Asia Connect as a Vice President. Asia Connect does not do business with North Bay Village. Gonzalez said that he will complete the gift disclosure form and submit it in the interest of full disclosure

04/05/13 – Vice-Mayor Eddie Lim –

Lim was contacted in connection with the aforementioned issue. Lim advised that he was casually introduced to Cheng by Commissioner Gonzalez about one year ago. Lim said that Asia Connect is dedicated to helping businesses and municipalities connect with investors from Latin America. Lim said that he was invited to the basketball game

by Commissioner Gonzalez who was invited by Cheng. Lim explained that he and Cheng are both Chinese.

04/19/13 – Pedro Cheng, Vice President of Asia Connect –

Pedro Cheng was informed as to the basis for the inquiry. Cheng advised that he has been friends with Gonzalez for over 15 years and has met with him socially on many occasions. Cheng said that he was given the three (3) tickets by a friend who has purchased a 4-person suite for the last several seasons, and often invites him. Cheng informed that on the night of the game, Gonzalez, Lim, the owner of the suite and himself were in attendance. Cheng said that he invited Gonzalez and Gonzalez invited Lim. Cheng said that he does not want to ask his friend about the cost of the suite.

Cheng contacted the COE on 04/22/13 and advised that the company that purchased the suite is TM Wireless Communication Services, Inc. or TM Telecomm Corp.

04/25/13 – Raquel Lippman, Legal Counsel, The Miami Heat/The Miami Heat Group –

Ms. Lippman was provided with the possible names of the purchaser of the subject suite. Ms. Lippman said that she pulled up information regarding the 4-person suite, which is actually a loge, purchased by TM Telecommunication. Ms. Lippman advised that her calculations concluded that a ticket for a seat in a 4-person loge, like the tickets given to Gonzalez and Lim, costs between \$110 and \$140.