



MIAMI-DADE COMMISSION ON ETHICS AND PUBLIC TRUST

19 West Flagler Street, Suite 820 □ Miami, Florida 33130

Phone: (305) 579-2594 □ Facsimile: (305) 579-0273

Website: ethics.miamidade.gov

MEMORANDUM

TO: Honorable Jose “Pepe” Diaz
District 12 Commissioner

FROM: Jose Arrojo, Executive Director
Commission on Ethics

SUBJECT: INQ 19-10, Sponsored Travel Costs – International Trade
Sections 2-11.1 (w), (g), (e)(4)

DATE: January 29, 2019

CC: All COE Legal Staff

Thank you for contacting the Miami-Dade Commission on Ethics and Public Trust and requesting our guidance regarding the following proposed transaction.

Facts: The Moroccan national air carrier, Royal Air Maroc, recently announced a partnership with MDAD that will result in the launch of the first direct Miami to Casablanca route on or about April 3, 2019. This will be the airport’s first new Africa route since the year 2000 and will be the only non-stop direct flight between Florida and the African continent. The County Mayor has publicly lauded the first ever connection between Miami and Casablanca and the MDAD Director has commented that this is the major milestone in the airport’s ninety-year history.

On or about April 4, 2019, a Moroccan business and trade delegation will be in Miami to highlight the start of the flights and to generally promote increased business ties between Miami and Casablanca.

Nathalie Scharf, a representative of the United States Department of Commerce, International Trade Administration, assigned to the Consulate General in Casablanca, Morocco has encouraged local government officials to attend a pre-cursor function to be held in Casablanca to commemorate the start of the direct flights and to encourage more business ties between the two cities.

It is anticipated that there will be opportunity for Commissioner Diaz to interact with Moroccan trade and business representatives. The event will take place at the Hyatt Regency Hotel in Casablanca on Saturday, February 16, 2019.

The American Chamber of Commerce in Morocco (AmCham Morocco) is a non-profit, non-government organization which represents American and Moroccan businesses and individuals. It

gifts that would have to be reported by filing a copy of gift disclosure forms required by Chapter 112, Florida Statutes, for local officers, with the appropriate receipt entity.

Opinion: The expressed purpose for the County official's travel to Casablanca, Morocco is attend a Miami event focused on expanding trade between Miami and Casablanca and is predicated on the establishment of direct non-stop air travel between Miami International Airport and Casablanca; the only direct flights between Florida and Africa.

The attending official is an elected Commissioner and the Chairman of the County's International Trade Consortium. He will be attending in his official capacity.

AmCham Morocco will be sponsoring the event and will pay costs expended by the local official's air travel, room and board, and meals. AmCham is not known to be a County contractor, vendor, service provider, bidder or proposer.

The local official will be reporting the costs associated with the travel as a gift expenditure pursuant to the Code of Ethics and applicable state statutes.

Accordingly, Commissioner Diaz, may accept the invitation to travel and allow AmCham Morocco to assume the costs associated with the travel to Casablanca, Morocco to attend the event as described above.

This opinion is limited to the facts as you and County staff presented them to the Commission on Ethics and is limited to an interpretation of the County Ethics Code only and is not intended to interpret state laws. Questions regarding state ethics laws should be addressed to the Florida Commission on Ethics.

INQs are informal ethics opinions provided by the legal staff after being reviewed and approved by the Executive Director. INQs deal with opinions previously addressed in public session by the Ethics Commission or within the plain meaning of the County Ethics Code. RQOs are opinions provided by the Miami-Dade Commission on Ethics and Public Trust when the subject matter is of great public importance or where there is insufficient precedent. While these are informal opinions, covered parties that act contrary to the opinion may be referred to the Advocate for preliminary review or investigation and may be subject to a formal Complaint filed with the Commission on Ethics and Public Trust.

Arrojo, Jose (COE)

From: Gonzalez, Manuel J. (RER)
Sent: Thursday, January 31, 2019 4:51 PM
To: Alufohai, Desmond U. (RER); Barahona-Alea, Nusly (DIST12); Arrojo, Jose (COE)
Subject: RE: Commissioner Jose "Pepe" Diaz Travel to Casablanca, Morocco

Thank you Desmond.

Manny

From: Alufohai, Desmond U. (RER)
Sent: Wednesday, January 30, 2019 10:32 AM
To: Barahona-Alea, Nusly (DIST12) <Nusly.Barahona-Alea@miamidade.gov>; Arrojo, Jose (COE) <Jose.Arrojo@miamidade.gov>
Cc: Gonzalez, Manuel J. (RER) <Manuel.Gonzalez3@miamidade.gov>
Subject: Re: Commissioner Jose "Pepe" Diaz Travel to Casablanca, Morocco

Dear Mr. Arroyo:

I am in receipt of your email concerning Commissioner Jose "Pepe" Diaz proposed travel to Casablanca at the invitation of AmCham Morocco.

As the staff person responsible for the African region for OEDIT, I can attest that ITC has had no dealings with Am Cham Morocco until the advent of this non-stop flight service between Casa and MIA. Also, to my knowledge, AmCham Morocco is not a County vendor, service provider, bidder or proposer. Please let me know if you need additional information regarding this matter.

Regards,

Desmond Alufohai.

[Get Outlook for Android](#)

From: Arrojo, Jose (COE)
Sent: Monday, January 28, 2019 6:51:53 PM
To: Barahona-Alea, Nusly (DIST12); Alufohai, Desmond U. (RER)
Cc: Gonzalez, Manuel J. (RER)
Subject: Commissioner Jose "Pepe" Diaz Travel to Casablanca, Morocco

Dear Ms. Alea and Mr. Alufohai:

Thank you both for speaking to me about Commissioner Jose "Pepe" Diaz's anticipated travel to Casablanca, Morocco to attend a Miami business focused event sponsored by the American Chamber of Commerce Morocco (AmCham Morocco). The event is billed as a precursor event to a Miami function in April to commemorate the initiation of direct non-stop travel from Casablanca, Morocco to Miami International Airport, the only non-stop flights in Florida to an African nation. The invitation was relayed by a U.S. Department of Commerce representative assigned to the Consulate General in Casablanca.

Please review the draft attached opinion regarding the application of various sections of the Miami-Dade Conflict of Interest and Code of Ethics Ordinance to the proposed transaction. Of critical importance to the analysis is the assertion that AmCham is not a County contractor, vendor, service provider, bidder or proposer. This fact needs to be confirmed prior to the final opinion issuing.

Ordinarily a draft opinion would not be shared with the requester but because the international travel date is upon us, I am doing so as a courtesy to Commissioner Diaz. However, again, I need confirmation that AmCham Morocco is not a county vendor.

Thank you again for contacting the Miami-Dade Commission on Ethics and Public Trust and relay my thanks to the Commissioner for seeking our guidance.

Best regards,

Jose J. Arrojo

Executive Director

Miami-Dade Commission on Ethics and Public Trust

19 W. Flagler Street, Suite 820

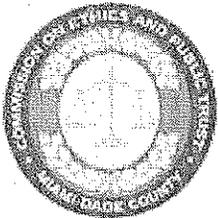
Miami, FL 33130

Jose.Arrojo@miamidade.gov

Tel: (305) 579-2594

Fax: (305) 579-0273

<http://ethics.miamidade.gov/>



Arrojo, Jose (COE)

From: Alufohai, Desmond U. (RER)
Sent: Monday, January 28, 2019 3:22 PM
To: Arrojo, Jose (COE)
Subject: RE: Morocco Trip

Dear Mr. Arroyo:

The American Chamber of Commerce (AMCHAM) in Morocco and U.S. Department of Commerce reached out to us to discuss inviting Miami-Dade County officials and leaders to Casablanca as a precursor to the inaugural flight from Casablanca to MIA. Below is the follow-up email.

Commissioner Jose "Pepe" Diaz is the Chairman of the ITC Board of Directors and he has lead numerous business development missions for Miami-Dade County over the years.

Please let me know if you have additional questions.

Thanks

Desmond Alufohai

Certified Global Business Professional (CGBP)
Certified Meeting Professional (CMP)
Snr. International Trade Coordinator
Economic Development & International Trade Unit
Department of Regulatory and Economic Resources (RER)
Miami-Dade County
Stephen P. Clark Center
111 NW First Street, 12th Floor
Miami, Florida 33128
Direct Line: 305-375-3526; Office: 305-375-1254
Fax: 305-679-7895; E-Mail: alufoha@miamidade.gov; URL: www.miamidade.gov/oedit; WeChat: desalufy.

Delivering Excellence Every Day

Miami-Dade County is a public entity subject to Chapter 119 of the Florida statutes concerning public records. Email messages are covered under such laws and thus subject to disclosure. All email sent and received is captured by our server and kept as public record. Please refer to Miami-Dade County's Administrative order 6-7.

De : genious <r.elalama@amcham.ma>
Date : Wednesday 16 January 2019 at 17:54
À : <alufoha@miamidade.gov>
Objet : FW: Gala Invites for Miami VIPs

Dear Desmond,
It was a pleasure talking to you and making your acquaintance.

As i mentioned, f the American Chamber of Commerce in Morocco (AmCham Morocco) is organising a gala ball under the theme "Miami" in celebration of the direct flight Casablanca-Miami launched by Royal Air Morocco.

This Gala will be held on Saturday, February 16th, 2019 at 8:00pm at the Hyatt Regency Hotel in Casablanca.

The AmCham Morocco Board of Directors will be deeply honored to host some VIPs from Miami you at this prestigious event of the year.

I look forward to your confirmation.

Yours Sincerely,

Kind regards,

Nathalie Scharf • Commercial Counselor
U.S. Department of Commerce | International Trade Administration
U.S. Consulate General | Casablanca, Morocco
Tel: +212 522 64 2129 | Email: Nathalie.Scharf@trade.gov

U.S. companies: www.export.gov/morocco
Invest in the U.S.: www.selectusa.gov

From: Arrojo, José (COE)
Sent: Monday, January 28, 2019 3:15 PM
To: Alufohai, Desmond U. (RER) <Desmond.Alufohai@miamidade.gov>
Subject: Morocco Trip

Desmond,

Thank you for talking to me. Any information that you can provide will be of great assistance.

Regards,

Jose

Jose J. Arrojo
Executive Director
Miami-Dade Commission on Ethics and Public Trust
19 W. Flagler Street, Suite 820
Miami, FL 33130
Jose.Arrojo@miamidade.gov
Tel: (305) 579-2594
Fax: (305) 579-0273
<http://ethics.miamidade.gov/>