

Meyers, Robert (COE)

From: Meyers, Robert (COE)
Sent: Wednesday, December 26, 2007 2:50 PM
To: Jolly, Narinder S. (Aviation)
Subject: RE: Request for opinion from Commission on Ethics?

Mr. Jolly,

After speaking with you on the telephone today, I find that H&S Group can lawfully pay your travel expenses. Additionally, given the fact you and Mr. Manny Gonzalez were acting in your official capacities when you visited India, the travel and hotel expenses paid for by H&G would not constitute a gift. Therefore, you and Mr. Gonzalez have nothing to report.

If you have any additional 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: Jolly, Narinder S. (Aviation) [mailto:NJOLLY@miami-airport.com]
Sent: Friday, December 21, 2007 2:09 PM
To: Meyers, Robert (COE); Ethics (COE)
Cc: Gonzalez, Manny J. (Aviation)
Subject: Request for opinion from Commission on Ethics?

Mr. Meyers:

At the invitation of H&S Group of Companies, the Miami-Dade Aviation Department (MDAD) sent Mr. Manny Gonzalez and me as a delegation to India for the purpose of exploring opportunities for cooperation, information sharing and MIA participation in the development of airports and related facilities in India. The delegation visited several Indian cities and met with State Chief Ministers, Ministers, officials of the Airports Authority of India (AAI), Airport Directors and selected business leaders.

Per the written understanding between H&S and MDAD (Letters attached) travel expenses for the trip were shared as follows:

MDAD paid for the air travel from Miami to India and back to Miami.

H&S paid for air travel within India.

H&S paid for hotel accommodations in India including breakfast during our hotel stays.

MDAD paid for meals and other ancillary expenses on a per diem basis.

Manny Gonzalez and I are wondering whether the costs shared by H&S need to be reported as gifts?

Attached notes from an ethics workshop mentions "**Gifts, such as paid luncheons, scholarships or travel expenses, given for official participation in such events and in connection with County duties**" in the "Exemptions" category from the disclosure

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requirement. Because the travel expenses shared by H&S were for an official visit, approved by the County, it would indicate that these were not gifts and thus does not require us to file disclosure forms. Incidentally, since H&S made direct payments to the service providers, we do not know the amount paid by H&S for these expenses.

We request your opinion on the issue to insure that we comply with the County policies?

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