

Meyers, Robert (COE)

From: Meyers, Robert (COE)
Sent: Thursday, March 19, 2009 3:32 PM
To: 'Klein, Steven'
Subject: RE: Educational Conference/Board Retreat

Dear Steve:

Thank you for your question. You indicate that you are on the advisory board of the Center for Haitian Studies, a 501(c)(3) non-profit agency, and you have been invited to this year's board retreat. The retreat will take place on a weekend cruise and there will be four hours of meetings each day. The value of this cruise is \$500 per person. I assume from your e-mail that your wife will be accompanying you on the cruise. Lastly, you do not believe that Jackson has a contractual relationship with the Center for Haitian Studies.

The county's ethics code does not prohibit you from going on this cruise, as the Center for Haitian Studies does not meet the definition of a Jackson Health System vendor or service provider. The only remaining question is whether you would have to report the cruise as a gift. The ethics ordinance does not consider gifts to family members as gifts to the employee. Therefore, I do not need to consider the fact that you wife may be joining you on the cruise and will simply look at the value of the cruise to you.

Given the value of the cruise is \$500, you should report this amount on a gift disclosure form. Please understand this form should be completed no later than the end of the next quarter from the date you go on the cruise. In other words, if the cruise dates are in April of 2009, you would be required to file your gift form by the end of September 2009. If the gift is received in March, then the form is due by the end of June 2009.

If you have any other questions, please do not hesitate to contact me at your convenience.

Thanks,

Robert Meyers, Executive Director
Miami-Dade Commission on Ethics and Public Trust

From: Klein, Steven [mailto:SKlein@jhsmiami.org]
Sent: Tuesday, March 17, 2009 5:20 PM
To: Meyers, Robert (COE)
Subject: Educational Conference/Board Retreat

Hi Robert. We haven't talked in a long while, but I've got situation which needs your call.

I am on an advisory board to the Center for Haitian Studies (CHS), a voluntary NFP 501(c)3 in Miami. They have an annual Board Retreat/educational program, and I have been invited to participate this year. This event takes place on a long weekend cruise which they pay for. The value is \$500 each for me and my wife. There is a full 4 hours of meetings each day in workshops and programs. Jackson does not have any contractual/business relationship with them (to my knowledge), though we do some community outreach and education for them.

Am I able to attend this retreat as their guest? If yes, what if any requirements do I need to fulfill?

Thanks in advance for your opinion.

Steve Klein

Sr. VP Network Development
Jackson Health System

3/19/2009