

## Frigo, Victoria (COE)

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**From:** Frigo, Victoria (COE)  
**Sent:** Monday, November 26, 2012 3:38 PM  
**To:** 'Foeman, Walter'  
**Cc:** Centorino, Joseph (COE)  
**Subject:** INQ 12-201 Elections Law

Hello Mr. Foeman,

Nothing in the County Ethics Code or County Campaign Ordinance prohibits the City from renting a space at the Coral Gables Farmers' Market to a candidate for public office in the City of Coral Gables. The candidate, who is not currently a City elected official but is a City advisory board member, intends to hand out campaign literature and promote his candidacy at the Farmers' Market. We understand that the transaction will be at arm's length with no special consideration given to the candidate. *See* County Code at Sec. 2-11.1 (g).

Because a vendor tent at the Farmers' Market could arguably be considered "a building owned by a governmental entity," we caution the candidate that Fla. Stat. 106.15 (4) prohibits candidates from accepting political contributions in buildings owned by a governmental entity.

If you have additional questions, please feel free to contact me.

Sincerely,

**VICTORIA FRIGO, STAFF ATTORNEY**

Phone: 305 350-0601

Fax: 305 579-0273



19 West Flagler St., Suite 820  
Miami, FL 33130

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**From:** Foeman, Walter [<mailto:wfoeman@coralgables.com>]  
**Sent:** Monday, November 26, 2012 12:24 PM  
**To:** Frigo, Victoria (COE)  
**Subject:** FW: Quick Question

Ms. Frigo:

Request is hereby made to provide me with a response to the herein below referenced issue:

Are there any Miami Dade Ethics provisions governing the handing out of campaign literature by a candidate during a Farmers Market event (i.e. after hours—on the weekend)?—including whether a candidate can buy vendor space to conduct such activity?-

In closing your continued cooperation and support is greatly appreciated.

Sincerely,

Walter Foeman  
City Clerk  
City of Coral Gables  
E-mail: [wfoeman@gmail.com](mailto:wfoeman@gmail.com)  
Phone: (305) 460-5207

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