

Frigo, Victoria (COE)

From: Ramos, Miriam S. (COE)
Sent: Friday, March 09, 2012 11:27 AM
To: Mazzorana, Shanda (ITD)
Cc: Stone, Deborah (ITD); Frigo, Victoria (COE)
Subject: RE: IBM presentation (INQ 12-40)

Good morning Shanda,

That is correct. Please feel free to direct all future inquiries to myself or Staff Attorney Victoria Frigo.

As long as the “lunch and learn” session takes place in Miami, employees may accept lunch provided by IBM. Sec. 2-11.1(w) of the Conflict of Interest Code provides that County employees may not accept travel expenses from a County vendor. Therefore, as long as the employee is not traveling, there is no prohibition on their acceptance of lunch from IBM.

Also, please note that if the value of each employee’s lunch exceeds \$100, it is a reportable gift under Sec. 2-11.1(e).

Sincerely,

Miriam S. Ramos, Esq.
Deputy General Counsel

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From: Mazzorana, Shanda (ITD)
Sent: Thursday, March 08, 2012 5:02 PM
To: Ramos, Miriam S. (COE)
Cc: Stone, Deborah (ITD)
Subject: FW: IBM presentation

I understand that Ardyth is no longer with COE and I was given your name as the legal consultant. I am the ethics officer and DPR for ITD. Please see my inquiry below.

From: Mazzorana, Shanda (ITD)
Sent: Thursday, March 08, 2012 4:54 PM
To: Walker, Ardyth (COE)
Cc: Stone, Deborah (ITD)
Subject: FW: IBM presentation

Ardyth, the message below indicates that IBM will make a technical presentation (lunch and learn format) about tools that we are using. They would like to offer lunch to all attendees. Is this okay? There is no fee for the presentation.

From: Stone, Deborah (ITD)
Sent: Thursday, March 08, 2012 4:42 PM
To: Mazzorana, Shanda (ITD)
Subject: IBM presentation

IBM will be doing a presentation here at ITD for us on March 22 they asked if they could provide lunch for those that attend since the presentation will go through lunchtime. Please let me know if they can?