Frigo, Victoria (COE)

From: Ramos, Miriam S. (COE)

Sent: Tuesday, May 08, 2012 12:03 PM

To: Frigo, Victoria (COE) **Cc:** Centorino, Joseph (COE)

Subject: INQ12-82

City of Miami ACM, Luis Cabrera called to inquire on the following. The FIU Leadership Institute is offering a 4-day course (cost approximately \$5,000) for which they have an empty slot. They have offered it to the City free of charge, in order for one of their ACMs to attend. Mr. Cabrera wanted to know whether this is permissible. I explained to him that the City of Miami Ethics Code bars City officials/employees from receiving any gift from a City vendor and instructed him to determine whether FIU is a vendor with the City of Miami. (I think they might be since they offer Ethics training to lobbyists for the City). If FIU is not a vendor, then I advised him that it would simply be a reportable gift to the official.

Miriam S. Ramos, £sq.

Deputy General Counsel

Miami-Dade County Commission on Ethics

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