

Frigo, Victoria (COE)

From: Frigo, Victoria (COE)
Sent: Wednesday, May 01, 2013 12:10 PM
To: Gonzalez, Manny J. (Aviation)
Cc: Centorino, Joseph (COE)
Subject: INQ 13-110 Raffle Prize

Mr. Gonzalez,

Under the County Ethics Code at Sec. 2-11.1 (w), you may accept two round-trip airline tickets from the Florida Customs Brokers & Forwarders Association (FCBF), a nonprofit trade association. The Miami-Dade County Airport and Seaport Departments are members of the FCBF, but you are not a member personally, and the FCBF is not a County contractor, vendor, service provider, bidder, or proposer.

Avianca Airlines, which is a County contractor, donated the airline tickets to the FCBF. The FCBF maintained exclusive control and possession of the tickets until you obtained them directly from the FCBF in a random drawing held on April 27, 2013.

The rationale for this opinion is based on your having obtained the airline tickets from a third party that is not a County contractor and that County employment was of no significance for participating in the random raffle.

You stated that you will disclose the gift of the airline tickets, valued at the price of unrestricted coach fares, in the quarter following the quarter in which you received them. This means that because you received the tickets in the second quarter of 2013, you must file a gift disclose form no later than September 30, 2013, the last day of the third quarter of 2013. *See* County Code at Sec. 2-11.1 (e)(4).

Sincerely,

VICTORIA FRIGO, SENIOR STAFF ATTORNEY

Direct Phone: 305 350-0601
Main Number: 305 579-2594
Fax: 305 579-0273



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Miami, FL 33130

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From: Gonzalez, Manny J. (Aviation) [<mailto:MJGonzalez@miami-airport.com>]
Sent: Tuesday, April 30, 2013 3:38 PM
To: Frigo, Victoria (COE)
Subject: RE: I won a pair of round trip tickets

Event: Florida Customs Brokers & Forwarders Association's 54th Annual Gala Celebration

Raffle: I won the enclosed that was given to FCBF for this occasion.

Florida Customs Brokers & Forwarders Association's 54th Annual Gala Celebration which will take place on Saturday, April 27th, 2013 at the DoubleTree Miami Mart Airport Hotel.

<http://www.fcbf.com/>

From: Gonzalez, Manny J. (Aviation)
Sent: Monday, April 29, 2013 12:23 PM
To: Frigo, Victoria (COE)
Subject: I won a pair of round trip tickets

Victoria,

Thank you for your time as I explained, I was at the Florida Customs and Freight Forwarders (FCBF) Gala dinner this Saturday and during the raffle for various items :

From food baskets, cash and tickets raffled, I lucky to win a pair of round trip tickets from Avianca Airlines. Avianca had donated them to FCBF for their GALA raffle.

Please advise.

Manuel J. Gonzalez
Chief
MIA Business Ventures
Miami International Airport
(305) 869-3880 mjgonzalez@miami-airport.com