

## Frigo, Victoria (COE)

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**From:** Frigo, Victoria (COE)  
**Sent:** Thursday, September 19, 2013 5:36 PM  
**To:** Campos, Evelyn (Aviation)  
**Cc:** Lee, Anne Syrcle (Aviation); Murray, David M. (Aviation); Del Calvo, Sara (Aviation); Eisenberg, Mindy (Aviation); Centorino, Joseph (COE); Diaz-Greco, Gilma M. (COE)  
**Subject:** Vendor Sponsored Travel (INQ 13-227 Campos)

Ms. Campos,

Below is our opinion about travel expenses for Aviation employees as per the County Code at Sec. 2-11.1 (w):

1. Regarding provisions in Aviation contracts that require vendors to pay for Aviation employees' travel expenses for product training and annual conferences, you are correct that these expenses are permissible because the County has provided adequate consideration through the terms of the contract and the BCC has approved the contract.
2. If the Aviation Dept. or the County is a member of an organization, Aviation employees may accept travel expenses from the organization if the travel is related to that membership.

If the Aviation Dept. or the County is *not* a member of the organization, Aviation employees may possibly be allowed to accept travel expenses from the organization *as long as* the organization is *not* a vendor, contractor, service provider, bidder, or proposer.

Speakers who make presentations at events are customarily allowed to enter the event without paying a registration fee. All other rules apply, however, regarding the prohibition about accepting travel-related expenses from a vendor, contractor, service provider, bidder, or proposer.

3. Unless the prohibition is waived by the BCC or is part of a current contract, Aviation employees *cannot* accept travel-related expenses from vendors, even for good reasons such as learning about new products or new technologies that may maximize your operations.

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

Sincerely,

**VICTORIA FRIGO, SENIOR STAFF ATTORNEY**

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**From:** Campos, Evelyn (Aviation) [<mailto:ECampos@miami-airport.com>]  
**Sent:** Wednesday, September 11, 2013 5:08 PM  
**To:** Centorino, Joseph (COE)

**Cc:** Lee, Anne Syrcle (Aviation); Murray, David M. (Aviation); Del Calvo, Sara (Aviation); Eisenberg, Mindy (Aviation)

**Subject:** Ethics Opinion on Vendor Sponsored Travel

The Aviation Department is seeking COE opinion relating to sponsor paid travel for Aviation employees. We are aware of Ordinance 04-55 requiring employees to not accept travel expenses from county contractors or vendors, unless the BCC has waived this requirement. Nonetheless, we have three different scenarios that we are submitting for your consideration and opinion to assure we are in compliance with ethics requirements:

1. The Miami-Dade Aviation Department has contracted with a firm to provide technological services to the Department. Within this agreement, a provision provides for Aviation employees to receive vendor sponsored travel for product training and annual conferences. The exact terms of this provision is stated:

*"...includes five (5) memberships to attend the Propworks Annual Conference and related training sessions. In this pricing are included two (2) MDAD memberships to attend the yearly PropWorks conference with associated airfare and lodging but excluding meals and other expenses"*

It is presumed the fee the Department pays to the vendor considers the memberships and conference attendance and therefore the Department indirectly pays for these expenses. Also, the contract was approved by the BCC, so is that considered a BCC waiver per the Ordinance? Shall our employees be allowed to accept this vendor's paid travel?

2. We also have instances where professional aviation organizations, of which we may or may not be members, will ask that our executive staff present various topics of aviation interest at their conferences or related forums. These speaking engagements are paid for by the organization. If we are a member of the organization, the Ordinance states paid travel is acceptable but if we are not members, is accepting travel expenditures non-compliant? Please clarify.
3. There may also be instances where contracted vendors will offer to pay for conferences/forums/events where their product or new products are being showcased. It is often through these forums where we are made aware of the newest technologies that maximize our operations. These travel expenditures are not considered in current agreement provisions. Would allowing our employees to accept these sponsor-paid travel packages be in non-compliance?

If you require clarification on any of the above, please do not hesitate to contact me. Thank you.

**Evelyn Campos, Director**  
**Professional Compliance Division**  
**Miami-Dade Aviation Department**

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