

Frigo, Victoria (COE)

From: Frigo, Victoria (COE)
Sent: Thursday, October 31, 2013 1:29 PM
To: Chong, Michelle (PWWM)
Cc: Centorino, Joseph (COE); Diaz-Greco, Gilma M. (COE)
Subject: United Way Charity Ball (INQ 13-279)

Ms. Chong,

You asked two questions in anticipation of the United Way charity ball, which is sponsored by the Miami-Dade Public Works and Waste Management Department (PWWM) and includes participation by the Miami Dolphins. PWWM has no contractual relationship with the Miami Dolphins, and the Miami Dolphins organization is not a County vendor.

First, barring any *quid pro quo* arrangement, PWWM employees may accept tickets from the Dolphins to attend a Dolphins football game in anticipation of the charity ball when the tickets are distributed fairly. If an employee receives a ticket or tickets valued in excess of \$100, the gift must be disclosed on the County gift disclosure form. (See Miami-Dade County Code at Sec. 2-11.1 (e)(4).)

Second, under the County Ethics Code, only County Commissioners and their staff member are allowed to solicit gifts on behalf of nonprofit organizations. (See Miami-Dade County Code at Sec. 2-11.1 (e)(2)(g).) Consequently, PWWM employees are prohibited from soliciting gifts from County vendors or from any other entities in support of the United Way charity ball.

As we discussed, a preferred way to handle solicitations would be to have the United Way staff contact potential contributors. In order to avoid the appearance of a *quid pro quo* arrangement, County vendors should *not be targeted* by the United Way or any other third party. However, vendors may be contacted in a general solicitation directed to a broad range of potential donors.

If you have additional questions, please feel free to contact me or my colleague, Gilma Diaz-Greco, Staff Attorney.

Sincerely,

VICTORIA FRIGO, SENIOR STAFF ATTORNEY

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