

## Frigo, Victoria (COE)

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**From:** Centorino, Joseph (COE)  
**Sent:** Wednesday, February 20, 2013 2:08 PM  
**To:** Frigo, Victoria (COE)  
**Subject:** INQ - Charles Citrin

Charles Citrin, City Attorney for the City of Hialeah Gardens, inquired as to whether an elected official in his City, who recently won election, could hold a thank you party at the senior citizen center in the City, and whether the location could be utilized for a promotional photo or video in connection with the event. I informed Mr. Citrin that a public facility could be utilized by an elected official for a political campaign event provided that the facility was available generally to the public for use, and the official in question paid the fair market value for the use of the facility consistent with what would be charged to any person who rented the facility. Without these conditions, the official could be considered to have engaged in an Exploitation of Official Position under Section 2-11.1(g) of the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance.

### *Joseph M. Centorino*

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