

## **Diaz-Greco, Gilma M. (COE)**

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**From:** Centorino, Joseph (COE)  
**Sent:** Tuesday, January 21, 2014 1:26 PM  
**To:** 'pbell@cutlerbay-fl.gov'  
**Cc:** Diaz-Greco, Gilma M. (COE)  
**Subject:** INQ - Councilwoman Peggy Bell, Town of Cutler Bay (Gifts)

Councilwoman Bell:

You have inquired regarding whether it is appropriate under the Miami-Dade Conflict of Interest and Code of Ethics for you to accept an undetermined number of complimentary tickets for yourself or others which have been offered to you by a former Mayor of Cutler Bay who serves on the Board of Directors of the Miami Symphony. The tickets, for a performance of the Symphony, are each valued at \$20. An offer was made to you that you and others designated by you could attend the performance at no charge.

It is my understanding that neither the Miami Symphony nor the former Mayor is a vendor, creditor or lobbyist at the Town of Cutler Bay, that they have no connection with and conduct no business with the Town of Cutler Bay, and that the offer to you was not made in consideration of any official action that you may have taken or may take in the future in your position as Councilwoman concerning the Symphony.

Under these circumstances, there is no prohibition in Section 2-11.1 (e) of the County Code that would prevent your acceptance of the tickets. Please be aware, however, that if you were to accept more than five such tickets for yourself or others, then you would be required to report the aggregate amount of the value of the tickets accepted on the State of Florida Gift Disclosure form, which is filed quarterly, because the value would exceed \$100.

Please let me know if you have any further questions.

Sincerely,

*Joseph M. Centorino*

Executive Director and General Counsel  
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