
From: Diaz-Greco, Gilma M. (COE)
Sent: Tuesday, August 26, 2014 8:54 AM
To: Sanchez, Rodzandra (COE)
Subject: Lynn Barrett, Chief of Compliance, Jackson Health Systems(gifts) INQ 14-197

INQ 14-197

From: Centorino, Joseph (COE)
Sent: Monday, August 25, 2014 2:52 PM
To: Diaz-Greco, Gilma M. (COE)
Cc: Sanchez, Gerald (CAO); Shy, Eugene (CAO)
Subject: INQ - Lynn Barrett, Chief of Compliance, Jackson Health Systems

Lynn Barrett, Chief Compliance officer for Jackson Health Systems (JHS) inquired regarding whether it would be a violation of the County Ethics Ordinance to solicit a hospital vendor, Microsoft, for use of "dance off" equipment owned by them at a planned JHS function. The function in question is designed as a morale booster for JHS employees.

I informed Ms. Barrett that County Ordinance would not clearly prohibit such a solicitation. However, the Commission on Ethics has generally discouraged all direct, targeted solicitations by county employees from county vendors or lobbyists, even where there is a governmental purpose involved, due to the possible interpretation of such solicitation as a *quid pro quo*. Additionally, in this case it might be possible to question whether this event truly involves a public purpose or whether it inures to the private benefit of county employees. If the latter were the case, it would not only be less palatable under county rules, but could involve a violation of state law that prohibits solicitation of gifts in excess of \$100 from vendors of the government agency. I advised that the JHS, which operates under a stricter standard of scrutiny than the rest of the county, which instructs its officials to avoid appearances of impropriety, not engage in the solicitation.

Joseph M. Centorino

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