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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Wednesday, September 17, 2014 1:14 PM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** Jimmy Nares, Miami-Dade County Dept. of Regulatory and Economic Resources (Travel Expenses) INQ 14-218

INQ 14-218

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**From:** Nares, Dimitrios (RER)  
**Sent:** Wednesday, September 17, 2014 11:16 AM  
**To:** Centorino, Joseph (COE)  
**Cc:** Diaz-Greco, Gilma M. (COE); Sanchez, Gerald (CAO)  
**Subject:** RE: INQ - Jimmy Nares, Miami-Dade County Dept. of Regulatory and Economic Resources (Travel Expenses)

Thank you for the clarification Mr. Centorino.

Regards,

Jimmy Nares

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**From:** Centorino, Joseph (COE)  
**Sent:** Wednesday, September 17, 2014 9:48 AM  
**To:** Nares, Dimitrios (RER)  
**Cc:** Diaz-Greco, Gilma M. (COE); Sanchez, Gerald (CAO)  
**Subject:** RE: INQ - Jimmy Nares, Miami-Dade County Dept. of Regulatory and Economic Resources (Travel Expenses)

Mr. Nares:

Section 2-11.1(w) of the County Ethics Code, which is the most relevant provision to this issue, applies only to current contractors, vendors, service providers, bidders or proposers. Therefore, a contractor that is not under and existing contract or does not have any pending bid or proposal or other arrangement involving the provision of goods or services to the County, is not prohibited under that section from providing transportation, lodging etc.. However, some care always needs to be exercised in this area. If the entity in question has a principal that is currently registered as a lobbyist in the County, then that entity may not provide any gift in excess of \$100 under Section 112.3148, Florida Statutes. Additionally, if the entity involved is a contractor that is known to be a contender for an upcoming bid, contract or proposal, then some caution needs to be exercised in determining the intent of the donor. A gift given for the purpose of influencing a government decision could violate Section 2-11.(e) and should never be accepted by a County official or employee.

Sincerely,

Joseph M. Centorino  
Executive Director and General Counsel  
Miami-Dade Commission on Ethics and Public Trust

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**From:** Nares, Dimitrios (RER)  
**Sent:** Wednesday, September 17, 2014 9:06 AM  
**To:** Centorino, Joseph (COE)  
**Subject:** FW: INQ - Jimmy Nares, Miami-Dade County Dept. of Regulatory and Economic Resources (Travel Expenses)

Good morning Mr. Centorino:

Could you please provide additional information regarding the Conflict of Interest and Code of Ethics Ordinance.....

Regards,

Jimmy

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**From:** Nares, Dimitrios (RER)  
**Sent:** Thursday, September 11, 2014 10:39 AM  
**To:** Centorino, Joseph (COE)  
**Subject:** RE: INQ - Jimmy Nares, Miami-Dade County Dept. of Regulatory and Economic Resources (Travel Expenses)

Hello Mr. Centorino:

Thank you for the additional information. I apologize, but I have one more point that I would like to get clarification on so we know to proceed going forward.

Section 2-11.1(w) prohibits accepting travel expenses from any County contractor, vendor, service provider, **bidder or proposer**. Can you please clarify if the Section applies to **current or active** County bidders or proposers. For example, would a company that bid or made a proposal on a County contract in the past but was **not** awarded the contract (thus, they did not become a County contractor, vendor, or service provider), be allowed to sponsor a future mission?

Thank you in advance.

Regards,

Jimmy Nares

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**From:** Centorino, Joseph (COE)  
**Sent:** Tuesday, September 09, 2014 4:48 PM  
**To:** Nares, Dimitrios (RER)  
**Cc:** Diaz-Greco, Gilma M. (COE)  
**Subject:** RE: INQ - Jimmy Nares, Miami-Dade County Dept. of Regulatory and Economic Resources (Travel Expenses)

Mr. Nares:

The prohibitions of Section 2-11.1(w) apply to any county contractor. If an entity receives funds from the County, and, pursuant the grant of County funds enters into an agreement with the County regarding how those funds will be spent, then it is a county contractor. On the other hand, there is an exception for travel expenses paid by other governmental entities or by organizations of which the County is a member if the travel is related to that membership. So even if The Beacon Council and Greater Miami Convention and Visitors Bureau are County contractors, they could still contribute if the County is a member of those organizations and the travel is related to that membership. I do not have the facts to answer these questions, but I assume that the information is readily available to you.

Joe Centorino

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**From:** Nares, Dimitrios (RER)  
**Sent:** Tuesday, September 09, 2014 3:58 PM  
**To:** Centorino, Joseph (COE)  
**Subject:** RE: INQ - Jimmy Nares, Miami-Dade County Dept. of Regulatory and Economic Resources (Travel Expenses)

Hello Mr. Centorino:

Thanks again for your opinion regarding this matter. Could you please further clarify whether entities such as The Beacon Council and Greater Miami Convention and Visitors Bureau who receive a portion of their funding from the County are considered County contractors, vendors, services providers, bidders or proposers. We need to determine if we can receive sponsorship revenue from them as well.

Regards,

Jimmy

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**From:** Centorino, Joseph (COE)  
**Sent:** Friday, September 05, 2014 4:27 PM  
**To:** Nares, Dimitrios (RER)  
**Cc:** Gelfman, Josh (RER); Diaz-Greco, Gilma M. (COE); Sanchez, Gerald (CAO); Diaz, Jose "Pepe" (DIST12)  
**Subject:** INQ - Jimmy Nares, Miami-Dade County Dept. of Regulatory and Economic Resources (Travel Expenses)

Mr. Nares:

You have inquired in your capacity as Chief, Economic Development and International Trade Unit of the Miami-Dade County Regulatory and Economic Resources Department, regarding the ethical propriety of accepting a \$15,000 sponsorship from Odebrecht USA, a Miami-Dade County contractor, to fund a Business Development Mission to Brazil during November. You have explained that a county-created and staffed 501(c)(3) organization, Trade Mission Center of the Americas, is the entity that is actually collecting the sponsorship and registration fees that will be used to fund the mission. That organization is overseen by a County board, the International Trade Consortium (ITC), which is chaired by Commissioner Jose "Pepe" Diaz (District 12).

Odebrecht, in response to a flyer generated by your agency, has contributed \$15,000 as an exclusive Platinum Sponsor of the trip. At this point the \$15,000 is 2/3 of the monies that have been contributed. You are continuing to seek other sponsorships and anticipate that there will be a number of private individuals or entities that will pay the \$1100 registration fee to attend the event, but who will be responsible for their own travel and lodging expenses. It is anticipated that the delegation will be led by Mayor Carlos Gimenez and will include Commissioner Diaz, yourself, and one other employee of your agency (all of whom will have their travel, lodging and incidental expenses paid out of the sponsorship and registration fees), and an as yet undetermined number of paid registrants.

Section 2-11.1(w) of the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance provides that no county official or employee "shall accept, directly or indirectly, any travel expenses, including, but not limited to, transportation, lodging, meals, registration fees and incidentals, from any County contractor, vendor, service provider, bidder or proposer." This provision may be waived by a majority vote of the County Commission.

Inasmuch as Section 2-11.1(w) would prohibit Odebrecht from directly or indirectly paying for the travel, lodging and incidentals of County officials and employees on this trip, it is my opinion that the public officials and employees involved could not go on this trip and thereby accept these paid expenses, without a waiver granted by the Board of County Commissioners. Acceptance of sponsorships from persons or entities that are not County contractors, vendors or services providers would not be prohibited under the aforesaid section.

Sincerely,

Joseph M. Centorino  
Executive Director and General Counsel  
Miami-Dade Commission on Ethics and Public Trust

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**From:** Nares, Dimitrios (RER)  
**Sent:** Friday, September 05, 2014 3:44 PM  
**To:** Centorino, Joseph (COE)  
**Cc:** Gelfman, Josh (RER)  
**Subject:** FW: sponsorship question - Business Development Mission to Brazil

Hello Mr. Centorino:

Thank you for your time in discussing the details of the possible sponsorship of Odebrecht for our business development mission to Brazil in November. Below is the response from Odebrecht showing interest in sponsoring our mission after they received a Save-the-Date blast e-mail communication from our office in August. Also attached for your information are the complete registration package (1<sup>st</sup> attachment) along with the Sponsorship information (2<sup>nd</sup> attachment). The Trade Mission Center of the Americas, Inc. (TMC) which is referenced in the registration is the 501c3 non-profit through which we route all mission revenues (including sponsorships) and mission expenses as we discussed. I will await your decision before processing sponsorship payment from Odebrecht.

Thanks again and please let me know if you have any additional questions.

Regards,

Jimmy Nares  
Chief  
Economic Development and International Trade Unit (EDIT)  
Department of Regulatory and Economic Resources (RER)  
Miami-Dade County  
111 NW 1st Street, 19<sup>th</sup> Floor  
Miami, FL 33128  
(305) 375-4626  
[nares@miamidade.gov](mailto:nares@miamidade.gov)

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**From:** Thais Reiss [<mailto:treiss@odebrecht.com>]  
**Sent:** Wednesday, August 20, 2014 3:23 PM  
**To:** Dreyfus-Ulvert, Maria (RER)  
**Cc:** Nares, Dimitrios (RER)  
**Subject:** RE: sponsorship question - Business Development Mission to Brazil

Thanks. Do you also have a tentative agenda?

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**Thais Reiss**

Corporate Communications

[treiss@odebrecht.com](mailto:treiss@odebrecht.com)



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[www.odebrecht.com](http://www.odebrecht.com)

**VoiP** 5001 8861

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**From:** Dreyfus-Ulvert, Maria (RER) [<mailto:mdreyfu@miamidade.gov>]  
**Sent:** Wednesday, August 20, 2014 15:19  
**To:** Thais Reiss  
**Cc:** Nares, Dimitrios (RER)  
**Subject:** RE: sponsorship question - Business Development Mission to Brazil

Thais,

Hi. Please find attached the sponsorship levels.  
Let me know if you have any questions.

Thanks.

**Maria Dreyfus-Ulvert**  
*Senior Trade Developer*  
**Economic Development and International Trade (EDIT)**  
**Department of Regulatory and Economic Resources**  
*111 NW 1 Street, 12<sup>th</sup> floor*  
*Miami, FL 33128*  
Tel: 305.375.3885; Fax: 305.679.7895

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**From:** Thais Reiss [<mailto:treiss@odebrecht.com>]  
**Sent:** Wednesday, August 20, 2014 3:15 PM  
**To:** Dreyfus-Ulvert, Maria (RER)  
**Subject:** sponsorship question - Business Development Mission to Brazil

Good afternoon Maria, how have you been?

I would like to learn about the sponsorship levels for this trade mission, please.

Looking forward to hearing back from you,

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**Thais Reiss**

Corporate Communications

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**VoiP** 5001 8861

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**From:** Moss, Elizabeth (RER) [<mailto:emoss@miamidade.gov>]  
**Sent:** Thursday, August 07, 2014 3:10 PM

**To:** Moss, Elizabeth (RER)

**Subject:** SAVE-THE-DATES: Business Development Mission to Brazil

Dear Business Associate:

We cordially invite you to “Save-The-Dates” for the **Business Development Mission to Sao Paulo and Rio de Janeiro, Brazil** scheduled for **November 11 – 19th, 2014**. This mission is organized by the Economic Development and International Trade (EDIT) Unit of Miami-Dade County, and will be led by Mayor Carlos A. Gimenez and Commissioner and Chair of the International Trade Consortium (ITC) Board of Directors, Jose “Pepe” Diaz.

The market prospects and leading sectors for U.S. exports in Brazil include:  
**Aerospace/Aviation, Computers and Parts, Construction, Medical Equipment and Supplies, Information and Communication Technology, Sporting Goods, Travel and Tourism, Education, Safety and Security, and Professional Services.**

The mission registration package outlining airfare and lodging will be released soon. Sponsorship opportunities are available for your consideration, and may be review by opening the enclosed attachment. Please contact Maria Dreyfus-Ulvert via email [mdreyfu@miamidade.gov](mailto:mdreyfu@miamidade.gov) or 305-375-3885 for additional information and sponsorships. We welcome and look forward to your participation.

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Para mais informações visite  
<http://www.messagelabs.com/email>

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