
From: Diaz-Greco, Gilma M. (COE)
Sent: Thursday, October 23, 2014 3:42 PM
To: Sanchez, Rodzandra (COE)
Subject: Dori Kublin (Travel Expenses-addendum to INQ 14-249)

Addendum to INQ 14-249

From: Ethics (COE)
Sent: Thursday, October 23, 2014 12:04 PM
To: Kublin, Dori (MDCR)
Cc: Diaz-Greco, Gilma M. (COE)
Subject: INQ - Dori Kublin (Travel Expenses-addendum)

Ms. Kublin,

It does not change matters if the pass was provided to the employee by a county vendor. If it had, in the first instance, been offered by a non-county vendor it would be a different outcome. However, I would caution against any arrangement to have the pass rerouted through another party at this point, since the ordinance, Section 2-11.1(w) does not permit the acceptance of such a benefit from a county vendor, directly or indirectly.

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

From: Kublin, Dori (MDCR)
Sent: Thursday, October 23, 2014 11:19 AM
To: Ethics (COE)
Subject: Question (Travel Registration)

Thank you for your response. I have another question regarding the same issue.

The traveler was able to acquire an email (see below) from the conference organizer, who is not a county vendor, stating that the passes that were handed out were free of charge with no monetary value. Does this change matters? Can we accept and use the pass? Please advise.

From: PWernet@grotecompany.com [mailto:PWernet@grotecompany.com]
Sent: Thursday, October 23, 2014 10:13 AM
To: Graham, Debra (MDCR)
Subject: Pack Expo passes

Debra,

Grote Company's invitation for free passes to Pack Expo are free to you and your colleagues. PPMI provided these free passes to help increase traffic to Pack Expo. They have absolutely free and have no value.

Regards,

Paula Adkins Wernet
Corporate Marketing Coordinator
Grote Company
614-868-8414

To Feed Our Growing World - Together

From: Ethics (COE)
Sent: Monday, October 20, 2014 12:39 PM
To: Kublin, Dori (MDCR)
Cc: Diaz-Greco, Gilma M. (COE)
Subject: INQ - Dori Kublin, Administrative Secretary/Travel Liaison, Miami-Dade Corrections and Rehabilitation Department (Travel Registration Fees)

Ms. Kublin:

You have inquired concerning whether a county employee may accept and use a complimentary registration pass (\$60 value) to an upcoming out-of-town conference provided by a county vendor. I assume for the purposes of this inquiry that the vendor is only providing the conference pass and that the travel involved and other incidental expenses are being paid by the county.

Section 2-11.1(w) of the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance prohibits acceptance, 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" (emphasis added). This prohibition may be waived if the County Commission approves the waiver by majority vote or if the travel expenses are paid by a governmental entity or by an organization of which the County is a member, if the travel is related to the membership. I assume that the latter waiver provisions have not been met in this instance.

Because of the outright prohibition on acceptance of conference registration fees provided by a county vendor to a county employee, I must advise you that the employee in question may not accept or use the complimentary registration.

Sincerely,

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

From: Kublin, Dori (MDCR)
Sent: Monday, October 20, 2014 11:22 AM
To: Ethics (COE)
Subject: Question regarding a gift

I am the travel liaison for my department. Recently a traveler submitted their travel request information in order to attend an upcoming conference. The traveler was given a complimentary registration pass from a vendor, who themselves had received the complimentary pass from the conference organizer. Without this complimentary pass the registration fee would have been \$60.00. After I submitted the Travel Request forms for processing to the Miami-Dade County Finance Department, they instructed me to contact the Ethics Commission for guidance on this matter.

How do I proceed?

Dori Kublin, Administrative Secretary/Travel Liaison
Fiscal Resources Division
Miami Dade Corrections & Rehabilitation Department
(786)263-6290 (Telephone)
(786)263-6187 (Fax)
www.miamidade.gov/corrections
"Delivering Excellence Every Day"

From: Diaz-Greco, Gilma M. (COE)
Sent: Monday, October 20, 2014 1:25 PM
To: Sanchez, Rodzandra (COE)
Subject: Dori Kublin, Administrative Secretary/Travel Liaison, Miami-Dade Corrections and Rehabilitation Department (Travel-Registration Fees) INQ 14-249
Attachments: Grote Company Invites You to Register for Free for PACK EXPO International 2014

INQ 14-249

From: Ethics (COE)
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To: Kublin, Dori (MDCR)
Cc: Diaz-Greco, Gilma M. (COE)
Subject: INQ - Dori Kublin, Administrative Secretary/Travel Liaison, Miami-Dade Corrections and Rehabilitation Department (Travel Registration Fees)

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