
From: Diaz-Greco, Gilma M. (COE)
Sent: Tuesday, October 21, 2014 2:49 PM
To: Sanchez, Rodzandra (COE)
Subject: Lynn Barrett, Chief Compliance Officer, JHS (Gifts) INQ 14-251

INQ 14-251

From: Centorino, Joseph (COE)
Sent: Tuesday, October 21, 2014 11:31 AM
To: Diaz-Greco, Gilma M. (COE); Shy, Eugene (CAO)
Subject: INQ - Lynn Barrett, Chief Compliance Officer, JHS (Gifts)

Lynn Barrett, Chief Compliance Officer for Jackson Health Systems (JHS) inquired concerning whether a nurse employed at Holtz Children's Hospital, part of JHS, would be permitted to solicit from Holtz a \$1000 contribution to purchase a table at a gala fundraiser for a not-for-profit organization where she draws a salary. The organization works with Central and South American countries to provide free services for children who need cardiac procedures. The proceeds would go directly to the not-for-profit organization which pays her a small salary.

While it would not be inappropriate for Holtz to support a not-for-profit providing such services to worthy applicants, the solicitation of such a gift from her public employer, to benefit an organization that pays her a salary, is not appropriate. It could be considered an illegal solicitation of a gift pursuant to Section 2-11.1(e)(3) of the County Ethics Code, or possibly an Exploitation of Official position pursuant to Section 2-11.1(g) of the Code. This type of solicitation is not exempted from the definition of a gift under Section 2-11.1(e). Therefore, I concurred with Ms. Barrett's conclusion that such a solicitation should not be permitted.

Joseph M. Centorino

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