
From: Diaz-Greco, Gilma M. (COE)
Sent: Tuesday, June 16, 2015 2:04 PM
To: Sanchez, Rodzandra (COE)
Subject: Myra Cottrill, Lobbyist, State and Federal Communications (Gifts) INQ 15-118

FW: INQ 15-118 Cotrill

From: Centorino, Joseph (COE)
Sent: Tuesday, June 16, 2015 2:02 PM
To: 'mcottrill@stateandfederal.com'
Cc: Diaz-Greco, Gilma M. (COE); Shy, Eugene (CAO); Barrett, Lynn (lynn.barrett@jhsmiami.org); Costanzo, Rosa M (RCostanz@jhsmiami.org); Sanchez, Gerald (CAO)
Subject: INQ 15-118 Myra Cottrill, Lobbyist, State and Federal Communications (Gifts)

Ms. Cottrill:

You have inquired, in your capacity as a lobbyist for a client doing business with Jackson Healthy Systems, whether it would be permissible for your client to provide a complimentary meal to JHS employees attending an educational training session that your client will be putting on in connection with its services at JHS.

Ordinarily, a regular County employee could accept such a complimentary luncheon as long as it is not being provided in exchange for any official act of the employees. However, inasmuch as JHS has a no-gift policy for its departmental employees, no vendor or contractor would be permitted to provide lunch on a complimentary basis to JHS employees, unless the provision of the luncheon is provided for under the terms of its contract with JHS. In the latter instance, the lunch would be considered part of the consideration for the contract and would not be considered a gift. If there is no such provision in the contract, then the luncheon would be considered a gift that cannot be accepted by the employees.

Sincerely,

Joseph M. Centorino

Executive Director and General Counsel
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