
From: Diaz-Greco, Gilma M. (COE)
Sent: Wednesday, September 02, 2015 9:55 AM
To: Sanchez, Rodzandra (COE)
Subject: Shanika Graves, Assistant County Attorney, Miami-Dade County (Gifts) INQ 15-195

[INQ 15-195 Graves](#)

From: Graves, Shanika (CAO)
Sent: Tuesday, September 01, 2015 11:44 AM
To: Centorino, Joseph (COE)
Cc: Diaz-Greco, Gilma M. (COE); Perez, Martha D. (COE); Sanchez, Gerald (CAO)
Subject: RE: INQ 15-195 Shanika Graves, Assistant County Attorney, Miami-Dade County (Gifts)

Thank you.

Shanika A. Graves
Assistant County Attorney
111 NW 1st Street
Suite 2810
Miami, Florida 33128
(305) 375-5706 - Direct Line
(305) 375-5611 - Fax
sgraves@miamidade.gov

From: Centorino, Joseph (COE)
Sent: Tuesday, September 01, 2015 11:42 AM
To: Graves, Shanika (CAO)
Cc: Diaz-Greco, Gilma M. (COE); Perez, Martha D. (COE); Sanchez, Gerald (CAO)
Subject: INQ 15-195 Shanika Graves, Assistant County Attorney, Miami-Dade County (Gifts)

Ms. Graves,

You have inquired on behalf of the Miami-Dade Community Action and Human Resource Department regarding whether that department may accept contributions from private non-profit or other community groups in connection with an upcoming conference being sponsored by the department at Albizu University. The conference is a county function for the purpose of providing and sharing informational services concerning domestic violence and related community issues. There are several community groups that have volunteered to support the conference by paying for lunch or other expenses connected to the conference, providing giveaways for attendees. It is my understanding that the purpose of the conference is to provide a benefit for individuals and groups in the community who may be involved in the issues discussed at the conference, and that County employees connected to the Community Action and Human Resource Department will not be directly benefited from the proceeds of the contributions other than whatever benefit is gained by the department itself.

Under these circumstances, it is my opinion that the receipt of such benefits by the County department involved would not involve any prohibited gift under the Miami-Dade County Ethics Code. Section 2-11.1(e) of the Code would generally permit the receipt of such contributions because they are given to benefit a County function being carried out by a County department, and not for any personal benefit to any public servant.

However, I would caution the department against accepting any such benefit from any group that may contract with the County to provide goods or services or which is the recipient of County funding, where there is any understanding or implied agreement for the department or any of its employees to take any future public action to benefit the contributor.

Sincerely,

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