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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Thursday, November 12, 2015 8:40 AM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** (Revised) Carlos Gimenez, Miami-Dade County Mayor (Gifts) INQ 15-255

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**From:** Centorino, Joseph (COE)  
**Sent:** Tuesday, November 10, 2015 4:29 PM  
**To:** Sanchez, Gerald (CAO)  
**Cc:** Diaz-Greco, Gilma M. (COE); Perez, Martha D. (COE)  
**Subject:** INQ 15-255 (Revised) Carlos Gimenez, Miami-Dade County Mayor (Gifts)

Gerald,

You have inquired on behalf of Mayor Carlos Gimenez regarding several scenarios in which he will be involved in the distribution of holiday turkeys and other benefits donated by private entities, wherein he will be going to various sites in the County to provide these donated items to deserving individuals selected to receive them. Three entities have requested that he be involved in the distribution of holiday turkeys. These include Winn-Dixie, where the Mayor has for a number of years been involved in the distribution of turkeys, and which are going to be provided to individuals identified and selected by the Mayor; the Miami Dolphins organization, which has donated 100 turkeys to Curley's House of Style, Inc., a non-profit food bank in Liberty City, and has asked the Mayor to be involved in the distribution; and Related Group, a local real estate development firm, which is providing 250 turkeys to residents of low-income sites which Related Group has constructed. It is known that Related Group is competing in a current County procurement that is presently under the Cone of Silence. The fourth distribution involves 20 gift vouchers paid for and donated by the Latin American Builders Association, which that organization will be providing to the Mayor for distribution to deserving individuals.

As I indicated to you, I do not find that any of these distributions by the Mayor would involve a violation of the gift provisions in Section 2-11.1(e) of the Miami-Dade Code of Ethics, inasmuch as none of them involve an apparent *quid pro quo* or a personal gift to himself or a family member, and do not involve a personal benefit to the Mayor that would be considered a gift to him under Section 2-11.1(e) of the Code. The Mayor is not prohibited from handling gifts for immediate distribution to deserving persons in the course of his official duties or in connection with a not-for-profit entity, and which are donated for public or charitable purposes, as all of these gifts appear to be. I would caution, however, that the Mayor's participation in a program sponsored by a current respondent in a County procurement could carry with it an appearance of impropriety, and that such a perception should be weighed by the Mayor in determining whether it is appropriate for him to participate in such a project.

***Joseph M. Centorino***

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