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FW: INQ 15-267 Agrippa

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**From:** Centorino, Joseph (COE)

**Sent:** Friday, November 20, 2015 3:19 PM

**To:** Diaz-Greco, Gilma M. (COE); Perez, Martha D. (COE)

**Subject:** INQ 15-267 Christopher Agrippa, Clerk of the Board, Miami-Dade County Clerk of Courts (Gifts/Exploitation of Official Position)

Christopher Agrippa, Clerk of the Board, Miami-Dade County Clerk of Courts, inquired concerning whether it would be permissible under the complimentary ticket policy adopted by the Commission on Ethics for a County Commissioner who had received an allotment of tickets to be distributed in accordance with the policy for the NASCAR race event in Homestead, to transfer the tickets to another County Commissioner to be distributed by that Commissioner. The reason for the switch is that the Commissioner involved had been unable to find a suitable group to accept the tickets and wanted to provide them to another Commissioner who might be better situated to distribute them.

Under the ticket policy adopted by the COE, tickets provided to a local government under a contract as part of the consideration for the contract are to be considered public property and must be distributed in a way that is appropriate to the distribution of public property including a public accounting for who receives them. I informed Mr. Agrippa that, as long as the tickets, which were provided to the County pursuant to a written agreement with the County, were distributed in a manner that comported with the ticket policy, i.e., distributed for public use rather than for the Commissioner's personal or private use, then it would be permissible for another Commissioner to distribute them.

*Joseph M. Centorino*

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