
INQ 15-282 Haber

From: Centorino, Joseph (COE)
Sent: Thursday, December 17, 2015 3:35 PM
To: MS (Haber@miamigov.com)
Cc: Diaz-Greco, Gilma M. (COE); Perez, Martha D. (COE)
Subject: INQ 15-282 Matthew Haber, Esq., Assistant City Attorney, City of Miami (Gifts/Tickets)

Mr. Haber:

You have inquired regarding whether there are any ethical issues raised in connection with the acceptance by City of Miami elected officials of complimentary tickets to a dinner (The Commissioner's Dinner) that have been extended to them Mike Oresco of the American Athletic Conference and the Miami Beach Bowl Committee. The Miami Beach Bowl is being co-sponsored by the City of Miami, which has committed public funds to this event in official action taken by the City. The dinner event involves a invitation to the elected officials as representatives of the City of Miami, a recognized co-sponsor of the Bowl. The tickets have been extended as a result of the City's official participation in this event and are not part of any agreement or contract or "public benefits" clause in any such written document or understanding.

It is my opinion that there is no legal prohibition in Section 2-11.1(e) against the acceptance by the elected officials of these tickets extended to them in connection with an event that is publicly co-sponsored by the City. In view of Section 2-11.1(e)(4), I think it would be advisable, for the officials to report the acceptance of such tickets in their quarterly gift disclosure, in the event that the value of the dinner event exceeds \$100.

Sincerely,
Joe Centorino

Joseph M. Centorino
Executive Director and General Counsel
Miami-Dade Commission on Ethics and Public Trust
19 W. Flagler Street, Suite 820
Miami, FL 33130
Tel: (305) 579-2594
Fax: (305) 579-0273
ethics.miamidade.gov

