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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Thursday, April 16, 2015 10:09 AM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** FW: INQ 15-70 Esteban Bovo, Vice-Chair, Miami-Dade County Commission (Gift Solicitation)  
**Attachments:** First Generation General Information -FIU fundraising.pdf

INQ 15-70 Bovo

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**From:** Centorino, Joseph (COE)  
**Sent:** Thursday, April 16, 2015 9:32 AM  
**To:** Annunziato, Alex C. (DIST13)  
**Cc:** Diaz-Greco, Gilma M. (COE); Sanchez, Gerald (CAO)  
**Subject:** INQ 15-70 Esteban Bovo, Vice-Chair, Miami-Dade County Commission (Gift Solicitation)

Mr. Annunziato:

You have inquired on behalf of Vice-Chair Esteban Bovo whether he may participate in a fundraising drive to raise funds for the First Generation Scholarship Fund at FIU. The program offers scholarships to FIU students who are first in their family to receive a college education. Vice-Chair Bovo will make personal telephone calls to FIU alumni to solicit funds for this cause. You have informed me that the funds will be routed through the FIU Foundation, a 501(c)(3) non-profit entity. It is my understanding that neither Vice-Chair Bovo nor his staff will be receiving compensation as a result of the solicitation. All funds raised through the solicitation will be going to this cause.

Pursuant to Section 2-11.1(e)(2)(g), there is an exception to the general prohibition on solicitation of gifts by Miami-Dade County officials and employees. Under the exception, gifts solicited by Miami-Dade County Commissioners or staff members on behalf of a 501(c)(3) nonprofit organization, where neither the commissioner nor the commissioner's staff receive compensation for the solicitation, are exempt from the definition of a "gift." Accordingly, I have concluded that Vice-Chair Bovo may engage in the solicitation on behalf of the First Generation Scholarship Fund at FIU.

Sincerely,

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

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**From:** Annunziato, Alex C. (DIST13)  
**Sent:** Wednesday, April 01, 2015 3:54 PM  
**To:** Centorino, Joseph (COE)  
**Subject:** Inquiry - Vice-chair Bovo (FIU)

Mr. Centorino,

Vice-chair Bovo has been asked by Florida International University's Alumni Association to participate in a fundraising drive to raise funds for the First Generation Scholarship Fund. This program offers scholarships to FIU students who are the first in their family to receive a college education. Specifically, the Vice-chair has been asked to make personal telephone calls to FIU alumni and solicit contributions to this very worthy cause. I have attached a description of the program for your review. We would like to COE to weigh in on whether the vice-chair's involvement would preclude him from voting on any matter presented to the Board concerning the proposed relocation of the Youth Fair to

accommodate FIU's planned main campus expansion. None of the funds being raised through this pledge drive would be used for the proposed expansion. Feel free to contact me if you have any questions.

Alex



Alex Annunziato  
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