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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Tuesday, April 21, 2015 9:26 AM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** INQ 15-72 - Matthew Haber, Assistant City Attorney, City of Miami (gifts)

INQ 15-72 Haber

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**From:** Centorino, Joseph (COE)  
**Sent:** Friday, April 17, 2015 4:05 PM  
**To:** Diaz-Greco, Gilma M. (COE)  
**Subject:** INQ 15-72 - Matthew Haber, Assistant City Attorney, City of Miami (gifts)

Mr. Haber inquired concerning commemorative gifts that the Miami Bayfront Management Trust had purchased for its Board members in connection with a recent event at Bayfront Park. He asked whether the commemorative gifts, valued at \$114 were considered reportable gifts under Section 2-11.1(e)(4), which requires gifts over \$100 to be reported on quarterly gift disclosure forms. The gifts in question were provided to all Board members and were not provided as awards for professional or civic achievement, which is a recognized exception, under Section 2-11.1(e)(2)(c) to the definition of a gift. Since the gifts did not fall under any recognized exception to the definition of a gift, I informed Mr. Haber that they would need to be reported. In answer to a question regarding whether, if a board member were to reimburse the Trust in the amount of \$14, the gifts would need to be reported, I told him that they would not need to be reported under those circumstances since the net gift would then not exceed the reportable amount of \$100.

*Joseph M. Centorino*

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