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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Friday, May 15, 2015 9:19 AM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** Elinett Ruiz, Attorney/Lobbyist, Arnstein & Lehr (Gifts) INQ 15-87

INQ 15-87 Ruiz

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**From:** Centorino, Joseph (COE)  
**Sent:** Thursday, May 14, 2015 4:42 PM  
**To:** Diaz-Greco, Gilma M. (COE)  
**Subject:** INQ 15-87 Elinett Ruiz, Attorney/Lobbyist, Arnstein & Lehr (Gifts)

Attorney Elinett Ruiz, of Arnstein & Lehr, a registered lobbyist, inquired regarding whether it was permissible for an entity transacting business with Miami-Dade County to contribute to political campaigns of County Commissioners. She was informed that, provided there are no quid pro quo understandings involving decisions made by a public official in consideration of a campaign contribution, an entity doing business with the County is permitted to make campaign contributions to elected officials in the County. While County vendors would not be permitted to provide gifts to elected officials in excess of \$100, lawful contributions to political candidates are not considered gifts either under State law or under Section 2-11.1(e) of the Miami-Dade County Conflict of Interest and Code of Ethics.

*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](http://ethics.miamidade.gov)

