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INQ 16-102 Sanchez

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**From:** Centorino, Joseph (COE)  
**Sent:** Wednesday, March 30, 2016 3:27 PM  
**To:** RadiaTuray@gmail.com; Perez, Martha D. (COE) <perezmd@miamidade.gov>; Diaz-Greco, Gilma M. (COE) <GDIAZGR@miamidade.gov>  
**Cc:** Gonzalez, Miguel (CAO) <gmiguel@miamidade.gov>; Sanchez, Gerald (CAO) <gks@miamidade.gov>  
**Subject:** INQ 16-102 Gerald Sanchez, Assistant County Attorney, Miami-Dade County (Gifts)

Gerald Sanchez, Assistant Miami-Dade County Attorney, inquired concerning whether the liaison from Miami-Dade Police Department to the Miami-Dade Military Affairs Board, a County advisory board, could accept paid travel to Buffalo, which would be provided by the National Drug Court Initiative (NCDI), a 501(c)(3) non-profit organization, for the purpose of having that individual view a model Veterans Court in Buffalo. The idea of establishing such a Veterans Court to service the special needs of County Veterans having contact with the justice system, is a County initiative that has been supported by the Military Affairs Board and other County officials. NCDI is not a County vendor, contractor or service provider, nor is there any expectation that it will become one in the event that the County establishes a Veterans Court.

I advised Mr. Sanchez, as well as Assistant County Attorney Miguel Gonzalez, that such paid travel would be permissible under the County Ethics Code inasmuch as there is no *quid pro quo* involved connected to any official county action that would create a prohibition under Subsection 2-11.1(e)(3), and the travel expenses are not being paid by a County vendor, contractor or other service provider, that would create a prohibition under Subsection 2-11.1(w). There is also no prohibition raised under Section 112.3148 since the entity is not a County lobbyist, contractor or political committee.

I advised that there would be a gift reporting requirement under Subsection 2-11.1(e)(4) for acceptance of a gift over \$100 from such an entity, although there appears not to be such a requirement under State Law since the individual in question does not file financial disclosure with the State.

### *Joseph M. Centorino*

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