

Sanchez, Rodzandra (COE)

From: Diaz-Greco, Gilma M. (COE)
Sent: Thursday, October 20, 2016 4:39 PM
To: Sanchez, Rodzandra (COE)
Subject: Rebeca Sosa, Miami-Dade County Commissioner (DIST 6) (Exploitation, Gift Disclosure)
INQ 16-239

INQ 16-239 Sosa

From: Centorino, Joseph (COE)
Sent: Wednesday, October 19, 2016 5:26 PM
To: Turay, Radia (COE); Perez, Martha D. (COE); Diaz-Greco, Gilma M. (COE)
Subject: INQ 16-239 Rebeca Sosa, Miami-Dade County Commissioner (DIST 6) (Exploitation, Gift Disclosure)

Betty Aguirre, Chief of Staff for MDC Commissioner Rebeca Sosa (DIST6) inquire regarding the use of tickets to a fundraising event for a local charitable organization, Voices for Children, purchased by the Commissioner from office funds. It was explained that Commissioner Sosa had donated \$5000 of her office funds to this charitable group, something that she has done in the past. The funds are primarily used as a donation, but include tickets to a luncheon in recognition of the contributors. A table consisting of ten tickets has been made available to Commissioner Sosa based upon the contribution. In the past, Commissioner Sosa has donated the tickets to deserving individuals in the community. However, this year, due to the hurricane and other pressing matters, the tickets have not been distributed. Since the event occurs this week, Commissioner Sosa inquired concerning whether it would be appropriate to have her staff members use the tickets, rather than let them go unused.

I opined to the Commissioner's chief of staff that the donation of the County funds was appropriate and, given the public interest nature of the charitable organization. I also suggested that it was permissible for her staff members to attend the luncheon given the public purpose behind the event and the Commissioner's role in it, and would not be considered an Exploitation of Official Position under Section 2-11.1(g) of the Ethics Code. I also told her that, in the unlikely event that the value of the luncheon exceeded \$100, the staff members should make a gift disclosure under Section 2-11.1(e)(4).

Joseph M. Centorino

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