
INQ 16-52 Meyers

From: Centorino, Joseph (COE)
Sent: Friday, February 19, 2016 4:37 PM
To: 'Robert Meyers' <RMeyers@wsh-law.com>
Cc: Perez, Martha D. (COE) <perezmd@miamidade.gov>; Diaz-Greco, Gilma M. (COE) <GDIAZGR@miamidade.gov>
Subject: INQ 16-52 Robert Meyers, Esq., Weiss Serota Helfman Cole Bierman (Exploitation)

Robert:

You have inquired concerning whether it would be appropriate under the County Code of Ethics for a municipal official to use his/her expense account, provided to that official to be used for public purposes, to pay for two tickets for the official and the official's spouse to attend the Miami-Dade County League of Cities Annual Gala. Each of the tickets is valued in excess of \$100. In the past the municipality has purchased a table for this event and provided the tickets to its officials. This year the municipality has decided not to purchase a table, leading to the official's desiring to do so out of a municipal expense account. Due to the nature of this event, which is sponsored by the League of Cities and is of particular importance to local elected officials in the County to attend representing their respective municipalities and to interact with other municipal officials and the League, it was appropriate for the municipality to decide to provide such a benefit to its officials. Although the payment by governmental agencies for spouses to attend events has in some cases been deemed inappropriate, this annual event is of such importance for a local official to appear and socialize at, that such an expenditure could be deemed appropriate for a municipality.

The use by an official of a public expense account may raise issues concerning transparency, but I am unable to conclude, given the municipality's prior sponsorship and payment for tickets for its officials to attend the same event, that usage of such an expense account to pay for the tickets would be in violation of Section 2-11.1(g) of the County Code of Ethics regarding Exploitation of Official Position. The expense does seem to be sufficiently related to the official's duties, and the attendance of the spouse expected and appropriate, such that it would qualify as a public purpose. However, it is still my recommendation that, for the sake of transparency in the usage of municipal funds, the official involved present the matter to the governing body for its approval.

Sincerely,

Joe Centorino

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