
INQ 16-53 Meyers

From: Centorino, Joseph (COE)
Sent: Friday, February 19, 2016 4:57 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 16-53 Robert Meyers, Esq. Weiss Serota Helfman Cole Bierman (Gifts)

Robert:

You have inquired concerning ethical requirements under the County Code of Ethics in connection with tickets to a racing event in the City of Homestead that a municipal official in a different municipality has received from his/her spouse, and which the official intends to distribute to employees of the official's municipality. The value of each ticket exceeds \$100. The spouse of the official is an owner of a business which is a sponsor of the event, and has the tickets as a result of that sponsorship. The business in question is not a contractor or vendor of the official's municipality and does not lobby the official's municipality. Since the tickets being received by the official are provided by that official's spouse, they are not included within the definition of a gift under the County Ordinance pursuant to Section 2-11.1(e)(2)(b) of the Code. There is no prohibition against the official's acceptance of the tickets and no requirement that the official file disclosure of them under Section 2-11.1(e)(4). However, the acceptance of the gifts by employees of the municipality would be considered to be gifts to the employees under the County Ordinance. Any municipal employee receiving such a ticket valued in excess of \$100 as a gift from the official would need to disclose that gift on an appropriate form pursuant to Section 2-11.1(e)(4).

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