

Sanchez, Rodzandra (COE)

From: Diaz-Greco, Gilma M. (COE)
Sent: Monday, April 24, 2017 9:10 AM
To: Sanchez, Rodzandra (COE)
Subject: Kimberly Brown, AICP, Supervisor, Long-Range Planning Section, Planning Division, Regulatory and Economic Resources Department (RER), Miami-Dade County (Gifts) INQ 17-122

INQ 17-122 Brown

From: Centorino, Joseph (COE)
Sent: Friday, April 21, 2017 3:36 PM
To: Brown, Kimberly (RER) <Kimberly.Brown@miamidade.gov>
Cc: Turay, Radia (COE) <Radia.Turay@miamidade.gov>; Perez, Martha D. (COE) <perezmd@miamidade.gov>; Diaz-Greco, Gilma M. (COE) <Gilma.Diaz-Greco@miamidade.gov>; Sanchez, Gerald (CAO) <Gerald.Sanchez@miamidade.gov>; Kirtley, Eddie (CAO) <Eddie.Kirtley@miamidade.gov>
Subject: INQ 17-122 Kimberly Brown, AICP, Supervisor, Long-Range Planning Section, Planning Division, Regulatory and Economic Resources Department (RER), Miami-Dade County (Gifts)

Ms. Brown:

You have inquired concerning whether your husband's acceptance of two complimentary \$250 tickets to a charity event, provided to him by a business acquaintance of his through his employment with Sabadell Bank, will result in a gift to you pursuant to Section 2-11.1(e) of the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance. You are employed as a Supervisor in the Long-Range Planning Section, Planning Division of the Miami-Dade County Regulatory and Economic Resources Department (RER). You have indicated that the donor, Florida East Coast Realty is not a current County vendor and employs no currently registered County lobbyists. Although you would be utilizing one of the tickets to accompany your husband to this event, the gift of the tickets is not, in any way, related to Miami-Dade County government or to your position with the County. The gift is not being given to your husband with any regard to your employment by the County.

Under these circumstances, the gift of the tickets is considered a gift to your husband, not to you. His provision of one of the tickets to you constitutes a gift from a relative, which, pursuant to Section 2-11.1(e) (2)(b) is not regarded as a gift subject to the gift provisions of the County Ethics Ordinance. Accordingly, there is no prohibition against your acceptance of the complimentary ticket from your husband, and no need for you to disclose the ticket as a gift to you in a Gift Disclosure form filed with the County. If the circumstances related above should change, please feel free to contact me for a supplemental opinion.

Sincerely,

Joe Centorino

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



From: Brown, Kimberly (RER)
Sent: Friday, April 21, 2017 11:33 AM
To: Centorino, Joseph (COE) <Joseph.Centorino@miamidade.gov>
Subject: RE: INQ regarding Gift Policy

To further supplement the below request, I've copied below a screen shot of the company information from the Lobbyist Registration database. The individual that offered the tickets is not listed.

Principal Name: **FLORIDA EAST COAST REALTY**

Lobbyist Name	Issue Description	Employed On	Issue Status
HOLLO, TIBOR	NONE	03/10/2014	Inactive
WALTERS, CLIFFORD (C) (A)	NONE	06/23/2009	Withdrawn
Monzon-Aguirre, Esther C (C) (X) (A)	NONE	03/25/2005	Withdrawn
PEREIRA, SERGIO (C) (A)	NONE	03/25/2005	Withdrawn
WALTERS, CLIFFORD (C) (A)	NONE	03/25/2005	Withdrawn

From: Brown, Kimberly (RER)
Sent: Friday, April 21, 2017 11:21 AM
To: Centorino, Joseph (COE) <Joseph.Centorino@miamidade.gov>
Subject: INQ regarding Gift Policy

Mr. Centorino,

My husband was offered free tickets for he and I to a charity event by a friend that is a high-ranking executive with a development firm. Tickets to the event normally cost \$250. My question is whether this qualifies as a gift to me under Section 2-11.1(e)(1) of the Code. In my role as Supervisor of Long-Range Planning with Miami-Dade County, I am responsible for providing recommendations to the Assistant Director related to applications requesting interpretations of and amendments to the Comprehensive Development Master Plan. To my knowledge, the company does not have projects that would come to me for review. In addition, a review of our lobbyist records shows that the individual that offered the tickets is not an active registered lobbyist with the County nor are other executives of the firm.

Thank you for your consideration of this inquiry.

Sincerely,

Kimberly Brown, AICP, Supervisor
Long-Range Planning Section, Planning Division
Regulatory and Economic Resources Department
Miami-Dade County
111 NW 1st Street - 12 Floor
Miami, Florida 33128
Phone: (305) 375-4724
Fax: (305) 375-2560
brownk@miamidade.gov

"Delivering Excellence Every Day"

Miami-Dade County is a public entity subject to Chapter 119 of the Florida Statutes concerning public records. E-mail messages are covered under such laws and thus subject to disclosure.