

Sanchez, Rodzandra (COE)

From: Diaz-Greco, Gilma M. (COE)
Sent: Monday, April 24, 2017 12:07 PM
To: Sanchez, Rodzandra (COE)
Subject: FW: INQ 17-123 Victoria Mallette, Executive Director, Miami-Dade County Homeless Trust (Gift Solicitation)

INQ 17-123 Mallette

From: Centorino, Joseph (COE)
Sent: Monday, April 24, 2017 11:44 AM
To: Mallette, Victoria (HT) <victoria.mallette@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 17-123 Victoria Mallette, Executive Director, Miami-Dade County Homeless Trust (Gift Solicitation)

Ms. Mallette:

You have inquired, in your capacity as Executive Director of the Miami-Dade County Homeless Trust, regarding whether you may solicit sponsorships on behalf of the Florida Coalition for the Homeless for its annual conference in Orlando this November. The Homeless Trust is a semi-autonomous agency of Miami-Dade County, that is funded wholly through grants and contributions and does not receive County tax funds. As Executive Director, you are still considered a County employee, subject to the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance, Section 2-11.1 of the County Code. The Florida Coalition for the Homeless is a statewide not-for-profit organization of which you are a board member. Its cause and purpose are consistent with your role as Executive Director of the Homeless Trust, in that the services it funds and provides are used to benefit the homeless, including those in Miami-Dade County. It serves a legitimate County purpose for you to participate as a board member of such an organization and to assist it in fulfilling its mission and goals.

As a County employee, you are not permitted to solicit gifts in your public capacity except in certain permissible circumstances. Soliciting for appropriate County purposes, however, is generally within the bounds of permissible activity for a County employee, as per Subsection 2-11.1(e)(2)(e) of the Ethics Code. However, this agency has generally discouraged the direct, targeted solicitation of County contractors, vendors, service providers or lobbyists, to avoid the perception of any *quid pro quo* in connection with any solicited gift. While it is certainly permissible for County contractors, vendors, service providers or lobbyists to contribute to County causes, the direct solicitation of such entities and individuals by those to whom they are accountable in the services provided to the County, can easily lead to an impression of an inappropriate solicitation. Therefore, you are advised, consistent with prior opinions we have provided, to avoid a direct, targeted phone call or other direct solicitation of a County contractor, vendor, service provider or lobbyist. It is best that such solicitations, if they occur, be made in the context of a general non-personal contact such as an email or written correspondence delivered to a more general audience of potential donors that is not exclusively limited to such persons or entities.

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
Fax: (305) 579-0273
ethics.miamidade.gov



From: Mallette, Victoria (HT)
Sent: Monday, April 24, 2017 10:26 AM
To: Centorino, Joseph (COE) <Joseph.Centorino@miamidade.gov>
Subject: RE: Seeking Guidance on Sponsorship Request

I can talk at 11am. Does that work?

From: Centorino, Joseph (COE)
Sent: Monday, April 24, 2017 10:18 AM
To: Mallette, Victoria (HT) <victoria.mallette@miamidade.gov>
Subject: RE: Seeking Guidance on Sponsorship Request

Victoria,

I have not forgotten you. Thanks for keeping me on the radar screen. I probably should have a telephone conversation with you about this. Are you free to talk sometime today?

From: Mallette, Victoria (HT)
Sent: Monday, April 10, 2017 8:41 AM
To: Centorino, Joseph (COE) <Joseph.Centorino@miamidade.gov>
Subject: Seeking Guidance on Sponsorship Request

Director Centorino...

I sit on the Board of the Florida Coalition for the Homeless <http://fchonline.org/about-us/our-team/>. The mission of the Florida Coalition for the Homeless (FCH) is to work collaboratively toward the prevention of homelessness and the creation of lasting solutions for homeless and at risk families, children, youth, and individuals throughout Florida. The Coalition is hosting its annual conference in Orlando in November and has asked all Board Members to secure three sponsorships (see attached). As the Homeless Trust is a funding organization and likely sponsors are homeless providers and others in the community (some of whom the Trust funds), what is the guidance for soliciting/securing sponsorships.

Sincerely,

Vicki

Victoria L. Mallette
Executive Director
Miami-Dade County Homeless Trust
Stephen P. Clark Center
111 NW 1st Street, 27th Floor
Miami, FL 33128
305-375-1491 Office
786-251-8324 Cell
vmallette@miamidade.gov

If you or someone you know is Homeless or about to become homeless, please call the Homeless Helpline at **1-877-994-HELP (4357)**.

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