

## **Sanchez, Rodzandra (COE)**

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Thursday, May 04, 2017 11:02 AM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** Raul G. Ordonez III, Director, Compliance, Office of Compliance and Ethics, Jackson Memorial Hospital (Travel Expenses, Section 2-11.1(w)) NQ 17-132

INQ 17-132 Ordonez

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**From:** Centorino, Joseph (COE)  
**Sent:** Thursday, May 04, 2017 9:37 AM  
**To:** 'Ordonez, Raul G' <raul.ordonez@jhsMiami.org>  
**Cc:** Ringholz, Judy <judith.ringholz@jhsMiami.org>; 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 17-132 Raul G. Ordonez III, Director, Compliance, Office of Compliance and Ethics, Jackson Memorial Hospital (Travel Expenses, Section 2-11.1(w))

Mr. Ordonez:

I agree with your recollection of the conversation we had regarding the prohibition in Section 2-11.1(w) of the County Ethics Ordinance. That section creates a broad prohibition against acceptance by any County official or employee of travel or travel-related expenses, such as lodging, meals, registration fees and other incidentals, paid for by any County contractor, vendor, service provider, bidder or proposer.

Section 2-11.1(w) explicitly recognizes an exception to this rule where the governing body, i.e., the Board of County Commissioners, or, at Jackson, the Public Health Trust board, waives the prohibition.

We have also recognized an exception to this rule where there is a contractual provision written into a contract, requiring payment of travel or travel-related expenses for County and PHT personnel. See INQ 13-26. This exception has been recognized due to the transparent fact that, in such situations, there is an apparent public purpose served by a provision providing such payment to the County or to Jackson as part of the consideration in the contract, and because contracts are generally approved by the governing body, which thereby implicitly waives the prohibition.

Sincerely,

Joe Centorino

*Joseph M. Centorino*

Executive Director and General Counsel  
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**From:** Ordonez, Raul G [<mailto:raul.ordonez@jhsiami.org>]  
**Sent:** Wednesday, May 03, 2017 6:41 PM  
**To:** Centorino, Joseph (COE) <[Joseph.Centorino@miamidade.gov](mailto:Joseph.Centorino@miamidade.gov)>  
**Cc:** Ringholz, Judy <[judith.ringholz@jhsiami.org](mailto:judith.ringholz@jhsiami.org)>  
**Subject:** Conflict of Interest and Code of Ethics Ordinance Question

Good afternoon Mr. Centurino,

Hope you are well. My name is Raul Ordonez, and I am a director in the Compliance Department at Jackson. You may remember that in September 2015, we participated in a call to better understand Section 2-11.1 (w) prohibition on acceptance of travel expenses from county vendors. From my recollection of our conversation, there were two exceptions to the statutory language where payment for travel expenses from county vendors is allowable:

- 1) If the recipient of the travel expenses obtains a waiver of the prohibition on acceptance of travel expenses from the Public Health Trust Board of Trustees; or
- 2) If the provision of travel expenses to the employee is included in an underlying contract or agreement.

We wanted to confirm that my understanding from that conversation was/is correct. Please advise if you would like to discuss, and as always, thank you for all your help.

Regards,

**Raul G. Ordonez III**

Director, Compliance  
Office of Compliance and Ethics

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