

Meyers, Robert (COE)

ING 06-100

From: Meyers, Robert (COE)
Sent: Wednesday, July 19, 2006 11:42 AM
To: Meyers, Robert (COE)
Subject: FW: Soliciting Contributions

This based on my opinion to Mr. Abbott on July 19, 2006.

From: Tim Abbott [mailto:TABBOTT@miami-airport.com]
Sent: Wednesday, July 19, 2006 11:00 AM
To: Hernandez, Pedro (Airport); Sanchez, Yolanda (Airport); Stover, Lauren (Airport)
Cc: Meyers, Robert (COE); Gillman, Henry (Airport)
Subject: Soliciting Contributions

Our office was recently asked about the propriety of MDAD employees' soliciting contributions from Airport tenants, airlines, and users for three projects: the demolition of the old FAA control tower and its relocation to the Atlantic for artificial reef purposes; the opening ceremony of the South Terminal; and the re-opening of the Concourse E art gallery. Here are some guidelines for soliciting contributions for any of these projects.

As you probably know, the County has an Ethics Code. Section 2-11.1(e) of the Miami-Dade County Code prohibits County employees from soliciting gifts. There are exceptions and one of the exceptions is "gifts solicited by County employees ...on behalf of the County in the performance of their official duties for use solely by the County in conducting its official business." Soliciting contributions for the three projects can come under this exception if the solicitations are done properly.

First, it would be important for MDAD to get a memo from the Aviation Director or the County Manager identifying the project in question as being important to the County business and authorizing MDAD staff to solicit contributions. Second, MDAD should make the solicitations from as broad a community spectrum as possible.

For the artificial reef project involving the old FAA control tower, direct your solicitation efforts not only to Airport users but to potentially interested community groups or individuals, such as those in the environmental protection or scuba diving area. I suspect MDAD can be more creative than I, and come up with other groups or individuals having an interest in the project.

For the art gallery project, try to direct your solicitations to the entire art community of the County, in addition to Airport users.

For the South Terminal project, definitely expand your solicitations beyond the Airport users likely to be tenants and users of the new South Terminal. Groups such as the Greater Miami Chamber of Commerce and the local business development organizations come to mind.

Finally, work with Accounting beforehand to establish a mechanism by which any contributions can be segregated into separate contribution accounts for each solicitation project, so that suitable records of the contributions can be kept.

Call if you have any questions.

7/20/2006