

IR 03-127

Walker, Ardyth (COE)

From: Walker, Ardyth (COE)
Sent: Monday, December 22, 2003 4:10 PM
To: McCarty, Jess (CA)
Subject: Seaport Question

Per our conversation on Friday, a group of Seaport employees has been approached by a potential vendor who would like to fly them to the company's headquarters in Cleveland. The vendor would transport the employees, by private plane, from Miami to Cleveland. One employee will be flown from Bangor, Maine to Cleveland. The Seaport may reimburse the vendor for the commercial flight equivalent of the trip.

As I stated on Friday, the Conflict of Interest and Code of Ethics ordinance permits the employees to accept the trip from the vendor. Although legal, the trip does raise the appearance of a conflict of interest and the best course is for the department to fly the employees to Cleveland. However, if the department decides to accept the vendor's offer, the employees must report the trip (including any incidentals and accommodations) on a quarterly gift disclosure form.

Please contact me if you have any further questions.