

solicited by county personnel for use in conducting official business. The MIA Security Heroes program is official county business for the purpose of improving security at MIA. Further, since the program is a joint effort between MIA and the FAA, the program falls within the exception under the ordinance.

This opinion construes the Miami-Dade Conflict of Interest and Code of Ethics ordinance only and is not applicable to any conflict under state law. Please contact the State of Florida Commission on Ethics if you have any questions regarding possible conflicts under state law.

If you have any questions regarding this opinion, please call the undersigned at (305) 579-2594 or Ardyth Walker, Staff General Counsel at (305) 350-0616.

Sincerely Yours,

A handwritten signature in cursive script, appearing to read "Robert Meyers", with a long horizontal flourish extending to the right.

ROBERT MEYERS
Executive Director



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STAFF GENERAL COUNSEL

June 25, 2001

Nelson Oramas
Aviation Department
P.O. Box 592075
Miami, FL 33159

RE: REQUEST FOR ADVISORY OPINION 01-22

Dear Mr. Oramas:

The Commission on Ethics and Public Trust considered your request for an advisory opinion at its meeting on June 12, 2001 and rendered its opinion based on the facts stated in your memorandum.

You requested an opinion regarding acceptance of free transportation from American Airlines for aviation employees to participate in a recognition ceremony in Washington D.C.

In your memo, you advised the Commission that in the wake of "Operation Ramp Rats", the Aviation Department has initiated a series of security initiatives that require employee participation. In order to recognize employees who have assisted in improving security at MIA, the Aviation Department has established the "MIA Security Heroes" program. The program honors Aviation Department employees, airport employees and federal and local law enforcement personnel.

The Commission found that the Conflict of Interest and Code of Ethics ordinance permits the Aviation Department to accept free transportation for American Airlines for employees to participate in the recognition program. Section 2-11.1(e)(2) exempts from the definition of gifts items that are