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**MIAMI-DADE COUNTY  
COMMISSION ON ETHICS & PUBLIC TRUST**

**In re: CRESPO v. REGALADO et al**

**C 12-07**

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**PUBLIC REPORT AND FINAL ORDER**

Al Crespo, a private citizen, filed the above-referenced complaint against the following respondents: City of Miami Mayor Tomas Regalado; City Manager Johnny Martinez; City Attorney Julie Bru; and City Commissioners Frank Carollo, Wilfredo Gort, Marc Sarnoff, Michelle Spence-Jones and Francis Suarez.

The complaint alleged that these respondents and other individuals associated with the City of Miami received free tickets from city contractors, which, if true, might violate the City Ordinance at Sec. 2-613. The complaint further alleged that these respondents and/or other individuals who received free tickets valued at over \$100 did not disclose the tickets as gifts, which, if true, might violate the County Code at Sec. 2-11.1 (e)(4).

Pursuant to the Code of Miami-Dade County at Sec. 2-1068, the jurisdiction of the Ethics Commission extends "to any person required to comply with the County or municipal Code of Ethics Ordinances...." The County Ethics Code at Sec. 2-11.1(a) extends the jurisdiction of the County Ethics Ordinance to municipal elected officials and personnel.

On March 27, 2012, the Advocate for the Ethics Commission appeared in public session to deliver his recommendation on the matter. Based on the findings of an investigation, no probable cause was found to suggest that violations of the City or County Ethics Code had occurred. The tickets in question were received pursuant to contractual agreements with the City. Respondents relied on an

interpretation of the City Code excluding tickets obtained through public contracts from reporting requirements because the tickets were intended for the use and benefit of the City.

On March 27, 2012, the Ethics Commission dismissed complaint C 12-07 for lack of probable cause, but issued a general letter of instruction to the City of Miami. The letter contained guidelines recently promulgated by the Ethics Commission for handling tickets received through public contracts for the public's benefit.

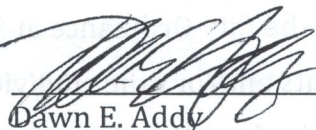
Therefore it is:

**ORDERED AND ADJUDGED THAT** the complaint against respondents Mayor Tomas Regalado; City Manager Johnny Martinez; City Attorney Julie Bru; and City Commissioners Frank Carollo, Wilfredo Gort, Marc Sarnoff, Michelle Spence-Jones and Francis Suarez is hereby dismissed for lack of probable cause.

**DONE AND ORDERED** by the Miami-Dade County Commission on Ethics & Public Trust in public session on March 27, 2012.

MIAMI-DADE COUNTY COMMISSION ON ETHICS  
& PUBLIC TRUST

By:

  
Dawn E. Addy  
Chair

Signed on this date: 4/25/2012