

Sanchez, Rodzandra (COE)

From: Diaz-Greco, Gilma M. (COE)
Sent: Wednesday, February 07, 2018 3:44 PM
To: Sanchez, Rodzandra (COE)
Subject: Jose Villalobos, Esq., City Attorney, City of West Miami (Gifts, Campaign Contributions)
INQ 18-36

INQ 18-36 Villalobos

From: Centorino, Joseph (COE)
Sent: Wednesday, February 07, 2018 3:18 PM
To: Turay, Radia (COE) <Radia.Turay@miamidade.gov>; Perez, Martha D. (COE) <Martha.Perez2@miamidade.gov>; Diaz-Greco, Gilma M. (COE) <Gilma.Diaz-Greco@miamidade.gov>
Subject: INQ 18-36 Jose Villalobos, Esq., City Attorney, City of West Miami (Gifts, Campaign Contributions)

Jose Villalobos, Esq., City Attorney for the City of West Miami inquired regarding whether it would be a problem for his firm, Akerman, to make campaign contributions to candidates in the City of West Miami, while Attorney Villalobos is serving there as City Attorney. Villalobos is Of Counsel to the Akerman firm. The City of West Miami contracts with Akerman for his services as City Attorney. I explained to Mr. Villalobos that there is no prohibition under County Ordinance or State law against municipal contractors making political contributions to candidates at municipalities where they do business. Political contributions authorized under State law are specifically exempted from the definition of a "gift" under Section 2-11.1(e)(2), as well as under Section 112.312(12)(b)(2), Florida Statutes. Obviously, the exemption would not apply to situations involving illegal contributions or contributions made as a quid pro quo for some City action.

Joseph M. Centorino

Executive Director and General Counsel
Miami-Dade Commission on Ethics and Public Trust
19 W. Flagler Street, Suite 820
Miami, FL 33130
Tel: (305) 579-2594
Fax: (305) 579-0273
ethics.miamidade.gov

