

Meyers, Robert (COE)

ING 09-173

From: Meyers, Robert (COE)
Sent: Tuesday, October 20, 2009 4:11 PM
To: Meyers, Robert (COE)
Subject: Inquiry

Gerald Sanchez and Bruce Libbhaver (sp?) of the County Attorney's Office called me on October 20, 2009 and asked whether a \$200 gift given to a department director from his co-workers as part of National Bosses Day represents a reportable gift where no one person gave more than \$20. I advised them that our office has held that gifts from co-workers do not have to be reported in excess of \$100 only when the gift is connected to a special event – i.e., a wedding, birthday of child, or some other event of similar significance. National Bosses Day does not have the same significance and, therefore, the gift should be reported. The fact that no one person gave a gift in excess of the threshold is not dispositive, as purpose of the law is for the recipient to disclose or report gifts over \$100. Otherwise, bundling could take place and an official or employee could receive a large gift and if it came from multiple donors and no person contributed \$100 the gift would not have to be reported.

Robert Meyers
October 20, 2009

10/20/2009