

Frigo, Victoria (COE)

From: Frigo, Victoria (COE)
Sent: Wednesday, February 03, 2010 11:09 AM
To: Granada, Rafael
Subject: League of Cities dinner tickets are not gifts

Ralph,

As we discussed this morning, the city's purchase of tickets to a League of Cities dinner for city council members are not gifts that the council members are required to report under the City of Hialeah Ordinance at Sec. 26-34 and under the County Code at Sec. 2-11.1 (e).

We understand that the purchase is being made by the city in order for the council members to represent the city in their official capacity at a League of Cities event. The value of an individual ticket is approximately \$95, which is under the threshold for reporting at the County level. Since the purchase is not being made by a vendor, but rather by the city in the furtherance of city business, the city code is not violated.

Sincerely,

Victoria Frigo, Staff Attorney
Miami-Dade County Commission on Ethics
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REFERENCE: INQ 10-23

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