

## Frigo, Victoria (COE)

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**From:** Centorino, Joseph (COE)  
**Sent:** Thursday, August 02, 2012 4:24 PM  
**To:** 'Matthew Pearl'  
**Cc:** Richard Jay Weiss  
**Subject:** RE: Acceptance of Tickets

Mr. Pearl,

Thank you for your question. In regard to the extension of complimentary tickets to members of your municipal boards for attendance at an official celebratory event, as described by you, planned by the City and held in honor of the City's centennial, it is my opinion that these occasions serve a suitable public purpose that tickets may be provided to such members by the City. I would caution, however, that these events should be events that are truly public in that they are sponsored by the City and members of the public will be in attendance.

Regarding the extension of such complimentary tickets to spouses or guests of the members, that is more problematic. In the absence of some official role designated to be played by the spouse or guest, it is my opinion that it would be inappropriate in most instances for a public entity such as the City of Homestead to expend public resources for what appears to serve a private purpose. In most instances, it would be more appropriate for the spouse and/or guest to pay for his/her own ticket to such events. This would not be the case in regard to events that are privately sponsored, where, under the Ethics Commission policy, tickets could be accepted by both the member and a spouse (assuming no improper motive is involved), provided that proper disclosure is made where the value of the gift(s) exceeds \$100.

I recognize that this is a grey area, and that consideration of some of the unique circumstances at some of these events could change the analysis. Obviously, we would be happy to revisit this issue and provide an opinion regarding any particular event.

Sincerely,

Joe Centorino, Executive Director, Miami-Dade Commission on Ethics and Public Trust

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**From:** Matthew Pearl [mailto:MPearl@wsh-law.com]  
**Sent:** Tuesday, July 31, 2012 9:52 AM  
**To:** Centorino, Joseph (COE)  
**Cc:** Richard Jay Weiss  
**Subject:** Acceptance of Tickets

Good morning Mr. Centorino,

I am writing you this morning in my capacity as attorney for the City of Homestead (the "City") to obtain clarification on the acceptance of tickets to a City sponsored event by a member of the City Council and/or a member of a City advisory board (the "City Officials") on behalf of themselves and their respective significant others.

In honor of the City's centennial, the City is planning several official celebratory events that will be held over the course of the next year. Included among the celebratory events will be the Homestead Centennial Reception (the "Reception"). The Reception will be held on either a Friday or Saturday night at the Homestead Community Center and will serve to recognize individual citizens for their role in the City's development. The Reception will be open to the invitees that will be recognized for their contributions to the City (the "Invitees") as well as those members of the public that purchase a ticket. Tickets will be sold by the City for approximately \$10.00.

It is anticipated that City Officials will make several proclamations in recognition of the Invitees. As such, attendance of the Reception by City Officials is obligatory. As the City Officials will be attending the Reception in an official capacity, we are of the opinion that they should not be required to purchase a ticket. Given that the Reception will be a formal event, held on a weekend evening, the City Officials have expressed their intent to bring their respective significant others. Under these circumstances, may the City provide the City Officials with a ticket for their respective significant others free of charge or is the City obligated to require that the City Officials purchase tickets for their significant others?

Thank you for your consideration.

Regards,

**Matthew Pearl**

Associate

**WEISS SEROTA HELFMAN  
PASTORIZA COLE & BONISKE**

200 East Broward Blvd., Suite 1900 | Fort Lauderdale, FL 33301

P: (954) 763-4242 F: (954) 764-7770 [wsh-law.com](http://wsh-law.com) | [vCard](#)



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