

Frigo, Victoria (COE)

From: Frigo, Victoria (COE)
Sent: Monday, August 13, 2012 4:01 PM
To: Casas-Perez, Belkys (ITD)
Cc: Centorino, Joseph (COE)
Subject: IBM NC Conference (INQ 12-136)

Ms. Casas-Perez,

I have discussed your question with our Executive Director and Deputy General Counsel, and we are of the opinion that County employees may not accept registration fees, lodging, meals and related expenses associated with a free conference offered by IBM. The value of these items is \$1,893.36 per person.

Your Director and Assistant Director may attend this conference only if the County pays for their expenses or if the Board of County Commissioners waives this prohibition by a majority vote at a public meeting. Your department may wish to place a request for a waiver on the agenda of an upcoming meeting of the BCC.

As we have discussed before, Sec. 2-11.1 (w) of the County Code specifically prohibits a County employee from accepting registration fees, meals, ground transportation, lodging and other incidentals from County vendors while traveling.

IBM's offer to pay for the expenses of *all* attendees does not alter our opinion. The plain intent of the Ethics Code is to prohibit County employees from accepting, directly or indirectly, any travel-related expenditures from vendors, regardless of how these outlays are characterized.

If you have additional questions, please do not hesitate to contact me.

Sincerely,

VICTORIA FRIGO, STAFF ATTORNEY

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-----Original Message-----

From: Casas-Perez, Belkys (ITD)
Sent: Wednesday, August 08, 2012 12:54 PM
To: Frigo, Victoria (COE)
Subject: FW: IBM Summit Registration
Importance: High

Good afternoon Mrs. Frigo,

I am writing to you to request your opinion on an ethics questions. Our department Director and Assistant Director have been nominated to attend an IBM conference being held at Pinehurst Resort in NC. According to the attached document, there is no cost being charged to any of the nominated

attendees, however, it states that the admission fee is valued at \$1893.36. Would it be appropriate to accept this admission fee waiver given that IBM is a registered vendor? Feel free to contact me should you have any questions.

Thank you,
Belkys

-----Original Message-----

From: De Vega, Fatima 'Tina' (ITD)

Sent: Wednesday, August 08, 2012 12:01 PM

To: Casas-Perez, Belkys (ITD)

Subject: IBM Summit Registration