

Frigo, Victoria (COE)

From: Frigo, Victoria (COE)
Sent: Wednesday, November 07, 2012 2:42 PM
To: Frigo, Victoria (COE)
Cc: Centorino, Joseph (COE)
Subject: INQ12-188 Rafael Granado, Miami Beach City Clerk

In a conversation today with Rafael Granado, City Clerk, City of Miami Beach, I clarified that gifts offered only to city employees through a city website are reportable if any employee receives a gift or series of gifts valued at over \$100 from one person or entity during a calendar quarter. *See County Code at Section 2-11.1 (e)(4).*

I also clarified that the County Code applies to city personnel "who serve in comparable capacities to the County personnel referred to." *See County Code at Section 2-11.1 (a).*

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From: Granado, Rafael [<mailto:RafaelGranado@miamibeachfl.gov>]
Sent: Saturday, November 03, 2012 12:37 PM
To: Frigo, Victoria (COE)
Cc: Granado, Rafael
Subject: FW: Questions on Gifts -

Mr. Frigo,

An additional question:

Are employee discount programs available to all City employees are considered gifts? (Differs from my second question below as it does not pertain to similarly situated employees, but to all City employees).

Regards,

MIAMI BEACH

Rafael E. Granado, *City Clerk*

CITY CLERK'S OFFICE

1700 Convention Center Drive, Miami Beach, FL 33139

Tel: 305-673-7411 www.miamibeachfl.gov

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From: Granado, Rafael
Sent: Saturday, November 03, 2012 11:54 AM
To: 'frigov@miamidade.gov'
Cc: Brooks, Kathie; Granado, Rafael; Rosenfeld, Leslie
Subject: Questions on Gifts -

Ms. Victoria Frigo,
Staff Attorney, Miami-Dade Commission on Ethics

Good morning Ms. Frigo,

It was a pleasure speaking with you at Miami-Dade County League of Cities Best Practices Seminar.

The City of Miami Beach is in the process of drafting a "Gift Policy". I have read all the Commission on Ethic's on-line opinions regarding Gifts, but have not found an answer to the following questions:

1. Are discounts offered to the general public considered gifts under the Miami-Dade County Code of Ethics?
2. May City employees accept discounts (ex food at local restaurants), if the discount applies to all similarly situated City employees or officials, and it is not otherwise offered as a quid pro quo or to convey a special financial benefit in violation of the misuse of office sections of the Code?

As always, I am very grateful for your assistance.

Regards,

MIAMIBEACH

Rafael E. Granado, *City Clerk*

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