

Frigo, Victoria (COE)

From: Frigo, Victoria (COE)
Sent: Friday, May 31, 2013 4:54 PM
To: barbara.kramer@citynmb.com
Cc: Centorino, Joseph (COE)
Subject: Solicitations on behalf of the city (INQ 13-135)

Councilwoman Kramer,

As we discussed, the County Ethics Code at Sec. 2-11.1 (e)(2)(e) and Sec. 2-11. 1 (e)(2)(f) allows city staff and city elected officials to solicit gifts on behalf of the city to be used by the city to conduct its official business. Of course, one cannot exploit one's official position in the solicitation, and no *quid pro quo* arrangement should be implied. In the past, the Ethics Commission has opined that government vendors may be included in the solicitation but should not be targeted. *See* RQO 06-05.

You may also wish to contact your city attorney, since restrictions under the North Miami Beach Code or city policies may apply.

Sincerely,

VICTORIA FRIGO, SENIOR STAFF ATTORNEY

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