

Frigo, Victoria (COE)

From: Frigo, Victoria (COE)
Sent: Monday, July 01, 2013 11:19 AM
To: Casas-Perez, Belkys (ITD)
Cc: Centorino, Joseph (COE); Diaz-Greco, Gilma M. (COE)
Subject: INQ 13-160 Complementary Pass to SHARE Conference in Boston

Ms. Casas-Perez,

A County employee *cannot* accept a complimentary pass to the SHARE Conference in Boston next month because the pass is being provided by IBM, a County vendor.

Sec. 2-11.1 (w) of the County Code prohibits County employees from accepting *travel* expenses, including "registration fees," from County vendors. Although the County may be a member of the SHARE group, it is IBM, not SHARE, that is providing the pass. Consequently, the exception under the ordinance that allows employees to accept travel expenses related to and paid for by "organizations of which the County is a member" does not apply.

A waiver of this provision may be granted by the Board of County Commissioners with a majority vote in public session. Additionally, as we have previously opined, employees may accept training locally, in many cases without a waiver, as long as no significant travel is involved.

Sincerely,

VICTORIA FRIGO, SENIOR STAFF ATTORNEY

Direct Phone: 305 350-0601
Main Number: 305 579-2594
Fax: 305 579-0273



19 West Flagler St., Suite 820
Miami, FL 33130

Miami-Dade County is a public entity subject to Chapter 119 of the Florida Statutes concerning public records. E-mail messages are covered under such laws and thus subject to disclosure.

From: Casas-Perez, Belkys (ITD)
Sent: Friday, June 28, 2013 3:17 PM
To: Frigo, Victoria (COE)
Subject: FW: Complementary Pass to Share Conference in Boston
Importance: High

Good afternoon Mrs. Frigo,

I am writing to you to request your opinion on an ethics questions. We have two employees who are planning to attend a technical conference in Boston, MA where the cost of registration is between \$1650 - \$1850 for each – the cost is determined based on the time of registration. Per email below, IBM a registered County vendor is offering us a complimentary Pass to this conference. I have also attached an email communication with additional information regarding a previous determination on complimentary services.

Given the timeframe below, would it be possible to obtain a determination by COB today?
Feel free to contact me should you have any questions.

Thank you,
Belkys

From: Garces, Tyrone (ITD)
Sent: Friday, June 28, 2013 2:43 PM
To: Casas-Perez, Belkys (ITD)
Cc: DiPrima, Adrienne (ITD)
Subject: FW: Complementary Pass to Share Conference in Boston

Belkys, below you will find the official offer from IBM regarding the Complementary Pass to the Share Conference in Boston. Please note that IBM, as a vendor, is offered this opportunity by the Share Conference organizers to invite a customer at no cost as long they (IBM) purchases a pass. Thank you.

From: Carlos Torres [<mailto:carlost@us.ibm.com>]
Sent: Friday, June 28, 2013 1:11 PM
To: Garces, Tyrone (ITD)
Cc: DiPrima, Adrienne (ITD); Liya Ma; Emily Loos
Subject: Complementary Pass to Share Conference in Boston

Tyrone,

On behalf of IBM, I'd like to offer you one complimentary pass to the SHARE Conference in Boston, MA the week of August 11. This pass is part of a vendor buy one and customer get one free program through SHARE that IBM is leveraging with its customers. If this violates any ethical rules the county has in place, please disregard.

If you decide to take advantage of this pass, I need you to confirm through email or via a phone call by Monday, July 15th. We will need the name, email, and phone number of the attendee. Details on this buy one get one free program can be sent to you if needed. More information on the conference can be viewed at: www.share.org.

Regards,

Carlos Torres

Manager, System z Client Architects Southeast and Mid Atlantic South
IBM Sales and Distribution
East IMT

One Alhambra Plaza, Suite 1415
Coral Gables, FL 33134

Phone: 561-862-3186
T/L: 975-3186
Mobile: 786-423-3668
Fax: 561-862-3186
carlost@us.ibm.com