

## Frigo, Victoria (COE)

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**From:** Frigo, Victoria (COE)  
**Sent:** Monday, August 05, 2013 4:01 PM  
**To:** 'Made@gmcvb.com'  
**Cc:** 'rolando@gmcvb.com'; Centorino, Joseph (COE); Diaz-Greco, Gilma M. (COE)  
**Subject:** Miami-Dade Ethics Code (INQ 13-194)

Ms. Paredes,

Ms. Ramos asked me to respond to your question about disclosing gifts as a board member of the Ronald Reagan Equestrian Center Council. The County Code requires board members to disclose gifts valued at over \$100 that have been transferred to them *without adequate consideration*. See the County Ethics Code at Secs. 2-11.1 (e)(1) and (e)(4).

In your case, as the Associate Vice President of Marketing & Creative Services for the Greater Miami Convention & Visitors Bureau (GMCVB), you provide adequate consideration when you attend functions as part of your employment obligation with the GMCVB. Therefore, community events, lunches, and dinners valued over \$100 and which you attend solely in return for rendering personal services to your employer are not considered gifts and need not be disclosed.

If you have additional questions or concerns, please feel free to contact me.

Sincerely,

**VICTORIA FRIGO, SENIOR STAFF ATTORNEY**

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**From:** Madeleine Paredes [<mailto:Made@gmcvb.com>]  
**Sent:** Thursday, August 01, 2013 4:10 PM  
**To:** Ramos, Miriam S. (COE)  
**Cc:** Rolando Aedo  
**Subject:** Miami-Dade Ethics Code

Hello Miriam,

Thank you for the very informative presentation on the Miami-Dade Ethics Code.

As I mentioned after the meeting. Part of my job includes attending events to promote Miami and the programs that we offer like Miami Spice, Miami Spa etc. We are in the sales and marketing business

The Greater Miami Convention & Visitors Bureau (GMCVB) is a private, non-profit organization with some funding from Miami Dade County, City of Miami Beach and City of Miami

I receive many invitations to events/lunches/dinners etc. that are more than \$100.

If I had to claim all these as gifts it would become an impediment to my job.

I reviewed your presentation with our Executive VP and CMO, Rolando Aedo, and he wondered why we were being held under the same scrutiny as an elected official.

He has served on many committees governed by Sunshine Law and not had file gift disclosures.

Please advise on your professional opinion as to my requirements.

Thank you.

*Madeleine Paredes*

Associate Vice President of Marketing & Creative Services

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