

Diaz-Greco, Gilma M. (COE)

From: Centorino, Joseph (COE)
Sent: Thursday, December 05, 2013 8:22 AM
To: Diaz-Greco, Gilma M. (COE)
Subject: INQ - Richard Chervony, Commissioner, North Bay Village (Gifts)

Commissioner Richard Chervony inquired whether it would be prohibited for him to give a Christmas Holiday gift of a box of chocolates (valued at \$70) to his Village Manager. The Manager's appointment is subject to the vote of the Commission in North Bay Village. I advised Mr. Chervony that it would not be prohibited for him to give such a gift, provided that there was no *quid pro quo* involved and no expectation on either side of such. As long as the gift was proffered as an expression of friendship or collegiality during the holiday season and not connected to any performance on the Manager's part on any action on the part of the Commissioner, there is no prohibition of the gift. The gift is less than the threshold for reporting gifts under the County Gift Ordinance (Section 2-11.1(e)) or State Law, both of which is \$100. However, since the North Bay Village ethics ordinance provides a lower threshold of \$25 for the reporting of a gift, the gift would have to be reported by the Manager.

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