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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Friday, July 18, 2014 11:53 AM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** Lynn Barrett, Chief Compliance Officer, Jackson Memorial Hospital- Ethics Opinion (Gift Solicitation) INQ 14-172

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**From:** Centorino, Joseph (COE)  
**Sent:** Thursday, July 17, 2014 2:58 PM  
**To:** Diaz-Greco, Gilma M. (COE)  
**Subject:** INQ - Lynn Barrett, Chief Compliance Officer, Jackson Memorial Hospital (Gift Solicitation)

Ms. Barrett inquired regarding possible ethical issues in the solicitation of sponsors of a symposium being sponsored by JMH in March of 2015 spotlighting their robotic program at Jackson South. There will be a general solicitation going out to Sponsors who may choose a level of sponsorship entitling the sponsor to certain benefits, such as a table to display and disseminate company information. The intent is to put out a general mailing, both by conventional mail and email, and then to follow-up in some instances with phone calls from JMH employees. I advised Ms. Barrett that, since solicitations by employees on behalf of the governmental entity are specifically exempted from the definition of a gift under Section 2-11.1(e)(2)(e), there is no prohibition to this solicitation. However, I also advised her that any solicitation to a current contractor or vendor at JMH should be handled carefully to avoid any implication of a *quid pro quo* or any negative consequence regarding their contract should they decline to participate. I also said it would be inappropriate to target JMH vendors or contractors or lobbyists in the solicitation. I suggested that a broad, general, mailing advising potential sponsors of the event and the opportunity for sponsorship would not be inappropriate. In terms of any follow-up by JMH staff to the potential sponsors, I discouraged any direct telephone contact with vendors, contractors or lobbyists, because of the potential for such parties to feel they were being pressured to contribute in order to maintain or receive favorable decisions at the PHT.

### *Joseph M. Centorino*

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