
From: Diaz-Greco, Gilma M. (COE)
Sent: Tuesday, November 04, 2014 4:06 PM
To: Sanchez, Rodzandra (COE)
Subject: Freddy Balsera, Lobbyist (Conflict of Interest) INQ 14-266

INQ 14-266

From: Centorino, Joseph (COE)
Sent: Tuesday, November 04, 2014 2:54 PM
To: 'Freddy Balsera'
Cc: Ric Katz; Diaz-Greco, Gilma M. (COE)
Subject: INQ - Freddy Balsera, Lobbyist (Conflict of Interest)

Mr. Balsera,

You have inquired whether Carlos J. Gimenez, son of Miami-Dade Mayor Carlos Gimenez, would be permitted to lobby on behalf of a client of your firm, Balsera Communications, in connection with a transportation project within the City of Miami. You have indicated that Mr. Gimenez would be engaged to represent your client's interests strictly within the City of Miami. I assume, for the purposes of this inquiry, that Mr. Gimenez would not be interacting with Miami-Dade County officials in connection with this lobbying effort, and that Mayor Gimenez himself would not play any decision-making role whatsoever in the outcome of this process.

Provided that Mr. Gimenez's lobbying activities are limited to the City of Miami, and do not involve interacting or influencing any decision-making process at the County, I do not find that there would be any prohibition for him to be engaged in such activity as a result of the public position held by his father as County Mayor.

Sincerely,

Joseph M. Centorino
Executive Director and General Counsel
Miami-Dade Commission on Ethics and Public Trust

From: Freddy Balsera [<mailto:freddy@balserapr.com>]
Sent: Monday, November 03, 2014 1:59 PM
To: Centorino, Joseph (COE)
Cc: Ric Katz
Subject: ethics opinion regarding City of Miami

Dear Mr. Centorino:

We have been engaged by a major international corporation to pursue a transportation project with them within the City of Miami. That corporation takes ethics very seriously and has an entire unit involved in making certain that their team members are completely free of conflicts of interest. They have scrutinized us exhaustively and they have recently asked us to seek opinion from the Miami Dade Commission on Ethics and Public Trust as to whether a specific member of our firm is able to represent their interests at the City of Miami. That individual is Carlos J. Gimenez, the son of Miami Dade Mayor Carlos Gimenez. Our request to you is to please advise us specifically as to whether the rules governing government liaison allow Mr. Gimenez to be engaged for this service strictly within the City of Miami without a violation of ethics rules. Due to the fact that this matter is at issue at this very moment, your expeditious processing of this inquiry would be great appreciated.

Sincerely,

Freddy Balsera
CEO
Balsera Communications