

Diaz-Greco, Gilma M. (COE)

From: Min, Barnaby <bmin@miamigov.com>
Sent: Tuesday, February 11, 2014 10:21 AM
To: Centorino, Joseph (COE)
Cc: Mendez, Victoria; Wysong, George; Diaz-Greco, Gilma M. (COE)
Subject: RE: INQ - Barnaby Min, Assistant City Attorney, City of Miami (tickets)

Thanks, Joe!!

From: Centorino, Joseph (COE) [<mailto:CENTORI@miamidade.gov>]
Sent: Tuesday, February 11, 2014 10:12 AM
To: Min, Barnaby
Cc: Mendez, Victoria; Wysong, George; Diaz-Greco, Gilma M. (COE)
Subject: INQ - Barnaby Min, Assistant City Attorney, City of Miami (tickets)

Barnaby,

You have inquired whether free tickets to the International Boat Show may be accepted by City officials. In general, if the tickets are not being given to an official for any anticipated official action, and it is not reasonable to assume that there is any benefit contemplated by the donor (which requires the recipient to exercise some judgment in the matter), they can be accepted as long as they are not valued at more than \$100 and being offered by a vendor or lobbyist. If they are valued at more than \$100 but not offered by a vendor or lobbyist they could be accepted by an official subject to the requirement that they be properly disclosed. It is the obligation of the donee to determine the fair market value of the ticket.

I am assuming that the reason for their being offered is not connected to any contractual requirement, in which case they would be considered public property and would have to be distributed in accordance with the attached policy. Further, if the intent of the donor is that they are being provided to public officials for the purpose of distribution to others in the community, then they would also be considered public property and would have to be properly distributed. This would not be the case if only one or two tickets is being offered to each official.

If, however, a block of tickets is simply provided to the City for distribution as it chooses and not directed for use by any public official, then again they could be considered public property and be subject to their use for public purposes as outlined in the attached ticket policy addendum.

If you have any questions, please feel free to call me at 305-579-2594

Joe Centorino

From: Min, Barnaby [<mailto:bmin@miamigov.com>]
Sent: Tuesday, February 11, 2014 9:55 AM
To: Centorino, Joseph (COE)
Cc: Mendez, Victoria; Wysong, George
Subject: Ethics Question

Joe,

I hope you're well. I want to ensure that we are properly advising our clients concerning tickets. We have received free tickets to the International Boat Show. There is no monetary price on the tickets. It is not from a vendor, lobbyist, or other entity that has an interest in the City. May our elected officials, City personnel, or others attend the Boat Show with these tickets? Please let me know.

Thank you,

Barnaby Min