

**MEMORANDUM**

**TO:** Commissioner Chip LaMarca

**FROM:** Andrew J. Meyers, Chief Deputy County Attorney

**DATE:** December 13, 2016

**RE: Offer of Tickets to Function of Museum of Discovery and Science  
CAO File: 16-12E (Gifts)**

In October, a longstanding personal friend, Charles Caulkins, offered you two tickets to attend a function of the Museum of Discovery and Science. You asked whether you may accept the tickets and whether, if you do, you have any reimbursement or disclosure obligation. We provided verbal guidance at that time. This memorandum merely formalizes what we have previously stated. For the reasons stated below, you may accept the tickets, you do not have any reimbursement obligation, and you might have an obligation to disclose the gift.

We researched the applicable County databases, and determined that neither Mr. Caulkins nor his law firm, Fisher & Phillips, is a registered County lobbyist, a principal or employer of a registered County lobbyist, or a County vendor or contractor. Accordingly, under both the state and county ethics codes, because this gift is offered to you by a longstanding friend in your personal (unofficial) capacity, you may accept the gift. If the value (the face value of the two tickets combined) exceeds \$100, you are obligated to disclose the gift on Florida Commission on Ethics Form 9 by March 31, 2017.

If we can be of further assistance regarding this matter, please let us know.

/s/ Andrew J. Meyers

Andrew J. Meyers  
Chief Deputy County Attorney