

ETHICS OPINION
Office of the City Attorney

TO: Commissioner Joy Carter
Members of the Coral Springs City Commission

FROM: John J. Hearn, City Attorney

RE: Attending the Association for Corporate Growth's Awards Banquet

DATE: June 18, 2018

On your behalf, Andrea Mayper, the City Commission Office Assistant, has asked if you may attend the Association for Corporate Growth's Awards Banquet on June 21, 2018. The ticket for the event is valued at \$150. At the banquet, you will be presenting ABB Optical with a Proclamation from the City Commission. Andrea explained that Tom Hicks, the Association for Corporate Growth's South Florida Treasurer/Secretary/Awards Chair, has personally paid the \$150 ticket price for you to attend the event. If these facts are incorrect or inaccurate in any way, please let us know since it may affect the opinion that we give.

The Broward County Code of Ethics, provides that "no Elected Official, or relative, registered domestic partner or governmental office staff of any Elected Official, shall accept any gift, directly or indirectly, with a value in excess of \$5.00" from any lobbyist registered with the City, from any principal/employer of any such lobbyist, or from vendors or contractors of the City. Section 1-19(c)(1)a., County Code of Ordinances. Commissioners may accept gifts in an "official capacity" from "other sources" up to \$50.00 per occurrence. Section 1-19(c)(1)b., County Code of Ordinances. The \$50.00 limitation does not apply to gifts given to Commissioners in their personal (non-official) capacity. Such gifts are still subject to the reporting requirements of Florida Statutes section 112.3148. Section 1-19(c)(1)c., County Code of Ordinances.

The Association for Corporate Growth, ABB Optical, and Tom Hicks are not lobbyists, vendors, or contractors of the City. Therefore, you may accept a gift in your official capacity up to a \$50 value. The balance of the ticket value over the \$50 gift must be reimbursed to Mr. Hicks. It is our understanding that the City has agreed to reimburse Mr. Hicks the additional \$100. As such, you may attend the event without any further obligation on your behalf.

If you need additional guidance regarding this matter, please feel free to contact my office.