

**ETHICS OPINION**  
***Office of the City Attorney***

**TO:** Vice Mayor Dan Daley  
Members of the Coral Springs City Commission

**FROM:** John J. Hearn, City Attorney

**RE:** Attending the Y-100 Jingle Ball Concert

**DATE:** November 29, 2016

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On behalf of the Mayor and City Commission, Andrea Mayper, the City Commission Office Assistant, has asked if you may attend the Y-100 Jingle Ball Concert. The ticket to the event is being given by the Greater Fort Lauderdale Alliance, and is valued at \$115.00. 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, as amended on December 8, 2015, 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 Greater Fort Lauderdale Alliance is not a lobbyist, contractor or vendor of the City<sup>1</sup>. Therefore, you may accept a gift up to a \$50.00 value and you must reimburse the Greater Fort Lauderdale Alliance \$65.00 for the value of the ticket within ninety (90) days from the date of the event.

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

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<sup>1</sup> The Broward County Code of Ethics defines a "contractor" as "any person or entity currently under contract with the applicable local government entity." Section 1-19(b)(1), County Code of Ordinances. While the City does pay membership dues to the Greater Fort Lauderdale Alliance, we do not consider payment of these dues to constitute a contract with the City.