



954-357-7600 · FAX 954-357-7641

**MEMORANDUM**

**TO:** Commissioner Tim Ryan

**FROM:** Neil Sharma, Assistant County Attorney *NS*

**DATE:** October 4, 2018

**RE:** **Invitation to Attend Greater Fort Lauderdale Sister Cities International's International Night Celebration**  
**CAO File: 18-11(E)**

You have inquired as to whether you would have any reimbursement obligation if you choose to attend the Greater Fort Lauderdale Sister Cities International's ("GFLSCI") International Night Celebration on October 2, 2018 ("event"), to which you were invited by Gabriel Zahora, Country Chairs Coordinator for the GFLSCI.

The event is open to the public at a price of \$50 per person. You are not required to independently inquire, but if you have any reason to believe that any of these facts are not accurate or have changed, please let us know as different facts might affect our opinion.

Under the State and County codes of ethics, there are two primary restrictions on the acceptance of gifts. The first is that no gift may be solicited or accepted if it may reasonably be perceived to have been given to encourage you to take any action in your official capacity. Section 112.313(2), Fla. Stat. The second restriction caps the value of gifts that may be accepted from certain donors.

There is no indication that the invitation to the event was offered in an attempt to influence your official position on a matter, and, as such, the first restriction is not applicable here. As to the second restriction, GFLSCI is not a County vendor, contractor, lobbyist, or principal of a County lobbyist, and there are no restrictions on the value of gifts that may be accepted from GFLSCI under state law. However, the County code is more limiting with regard to acceptance of gifts.

Under the County's code, Commissioners may accept gifts in their official capacity that do not exceed \$50 from donors other than County vendors, contractors, lobbyists, or principals of County lobbyists. Section 1-19(c)(1)(b), Broward County Code of Ordinances.

The gross value of the gift for the event is \$50, the cost of the ticket. Because the value of the gift does not exceed the \$50 limit you can accept from donors other than County

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vendors, contractors, lobbyists, or principals of County lobbyists under the County code, you have no reimbursement obligation for accepting the ticket and attending the event.

The County Attorney and I are available to answer any questions regarding this matter.

- c. Andrew J. Meyers, County Attorney  
Rocio Blanco Garcia, Assistant County Attorney