
From: Diaz-Greco, Gilma M. (COE)
Sent: Wednesday, January 28, 2015 1:28 PM
To: Sanchez, Rodzandra (COE)
Subject: FW: Brian Andrews, Ethics Opinion (Limitations on Contracting with the County) INQ 15-10
Attachments: INQ 15-10 Andrews.pdf; Andrews applic..pdf

INQ 15-10 Andrews

From: Diaz-Greco, Gilma M. (COE)
Sent: Monday, January 26, 2015 9:21 AM
To: briancandrews@gmail.com
Cc: Centorino, Joseph (COE)
Subject: Brian Andrews, Ethics Opinion (Limitations on Contracting with the County) INQ 15-10

Dear Mr. Andrews:

Attached is the Limitations on Doing Business with the County Ethics Opinion letter. Please note that it indicates *inter alia*, that Brian Andrews USA, LLC may enter into contracts with Miami-Dade County but not with the Miami-Dade County Film and Entertainment Advisory Board, or the Office of Film and Entertainment.

You may print this letter and submit it to the Procurement Department. I will send you the original letter via regular mail.

Please contact me if you have further questions.

Sincerely,

Gilma (Mimi) Diaz-Greco
Staff Attorney



Miami-Dade Commission on Ethics and Public Trust
19 W. Flagler Street, Suite 820
Miami, FL 33130
Tel: (305) 579-2594
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email at: briancandrews@gmail.com

January 26, 2015

Brian Andrews
Brian Andrews USA, LLC
255 Mockingbird Trail
Palm Beach, FL 33480

Please submit this letter to the Procurement your County Board Members Wishing to Register as County Vendors' application. The Ethics Commission does not submit this letter on your behalf.

Re: INQ 15-10, Limitations on Doing Business with the County

Dear Mr. Andrews:

You serve on the Miami-Dade County Film and Entertainment Advisory Board (FEAB) as a board member. FEAB supports and advances the interests of the film and entertainment industry in Miami-Dade County and advises the Board of County Commissioners and the Mayor on film and entertainment industry matters.

On January 23, 2015, you asked about limitations in doing business with the County through your privately owned company, Brian Andrews USA, LLC, which is a public relations/management services consulting business. You advise that you would not be seeking to do business with either the FEAB or the Office of Film and Entertainment (OFE).

Your board service with FEAB does not preclude you from contracting with the County as long as neither the OFE nor the FEAB has oversight over your County contracts.

The County Ethics Code at Sec. 2-11.1 (c)(3) prohibits a County board member from entering into a contract with the County if the board on which he serves would oversee the contract. Further, Sec. 2-11.1(m)(2) prohibits a County board member from making presentations or seeking any benefits for himself or others from the board on which he serves. Sec. 2-11.1(v) is also relevant. It prohibits a County board member from voting on a matter if he would be directly affected by the vote and he has an enumerated relationship with the entity before the board.

Based on the facts you presented, you would not have a prohibited conflict of interest because FEAB would not be involved in any aspect of the contracts your firm enters into with the County. This opinion construes the Miami-Dade Conflict of Interest Ordinance only and is not applicable to any conflict under state law. Inquiries regarding possible conflicts under state law should be directed to the Florida Commission on Ethics.

If any of the facts you have presented change or if you have further questions, please feel free to contact me at 305 350-0638.

Sincerely,

A handwritten signature in cursive script that reads "Gilma Diaz-Greco".

Gilma Diaz-Greco
Staff Attorney



County Board Members Wishing to Register as County Vendors

Please submit the following information by mail, fax, or email to:

Gilma Diaz-Greco, Staff Attorney
The Commission on Ethics and Public Trust
19 West Flagler Street, Suite 820
Miami, FL 33130

Phone: (305) 350-0638
Fax: (305) 579-0273
Email: gdiazgr@miamidade.gov

Board Member's Name BRIAN ANDREWS

Board Name FILM + ENTERTAINMENT Advisory BOARD

Board Member Title BOARD Member

Business Name/Type of Business BRIAN ANDREWS USA, LLC

Board Member's Mailing Address 255 Mockingbird TRAIL, PALM BEACH, FL 33480

Board Member's email briancandrews@gmail.com

Do you have a **controlling financial interest** (10% or more) in a corporation, firm or entity that is seeking to contract with the County? Yes No

If not, are you or any of your immediate family members **employed** by a County Vendor? Yes No

Name of County Vendor _____

The Miami-Dade County Conflict of Interest & Code of Ethics Ordinance Sec. 2-11.1 (c)(3) and (d) allows County Board Members who have a **controlling financial interest (10% or more)** in a corporation firm or entity to contract with the County in certain circumstances and if the following criteria are met: [See also Secs. 2-11.1 (m)(2),(v)]

1. I will not contract with any County agency or department subject to the regulation, oversight, management, policy-setting, or quasi-judicial authority of the board of which I am a member. See 2-11.1(c)(3) and (d).
2. I will not make a presentation or seek any benefits for myself or others from the board on which I serve. See 2-11.1(m)(2).
3. I will not vote on any matter if I will be directly affected by the vote and I have one of the enumerated relationships in Sec. 2-11.1(v) with the firm, corporation, or entity before the board.

I have read these requirements and pledge to abide by them.

Brian C. Andrews
Signature

1/23/14
Date