From: Diaz-Greco, Gilma M. (COE)

Sent: Monday, August 10, 2015 12:22 PM

To: Sanchez, Rodzandra (COE)

Subject: Sean McKeen, Town of Surfside Tourist Board (Sections 2-11.1(c)(3), (q), (h), (i), (v)) FW:

INQ 15-173

Attachments: ethical_issues_for_potential_advisory_board_members_8-15.pdf

INQ 15-173 McKeen

From: Centorino, Joseph (COE)

Sent: Friday, August 07, 2015 6:14 PM **To:** 'smckeen@hotelequities.com'

Cc: Linda Miller (linda M. (COE); Perez, Martha D. (COE)

Subject: INQ 15-173 Sean McKeen, Town of Surfside Tourist Board (Sections 2-11.1(c)(3), (g), (h), (i), (v))

Mr. McKeen,

You have asked for ethical guidance in connection with your appointment to the Tourist Advisory Board in the Town of Surfside. You are currently employed as the general manager of the Marriott Residence Inn in the Town of Surfside. The Town Code requires that the Tourist Board include a member from the hospitality industry, which you would fulfill. You were concerned about possible conflicts with your position at the Marriott Residence Inn.

Since you represent a particular community that is required to be represented on the board, there is no problem with your appointment. However, due to your position with a private entity that would likely be affected by issues coming before the board, you should be aware that there are some provisions of the Miami-Dade County Ethics Code that could apply to some situations that may confront you as a member of the board. Generally, to avoid any appearances of impropriety you should avoid participating or voting on any matter that would specially affect your employer in a way that would be more direct and specific than the effect on any other private interest in the Town, e.g., a vote that would have a direct impact on your employer's business, either positively or negatively, but which would not similarly affect other businesses or residences in the community. Inasmuch as Surfside is a small community, it is understood that almost anything that happens in the Town will have impact on the entire town in some way. And certainly, actions which will promote tourism in the Town, which I assume will be the focus of your service on the board, will be beneficial to and affect your employer. You need not be concerned that such matters will create any problem for your participation, since the entire town and all business interests in the Town will presumably benefit from such activity. Your concern should be that you not be perceived as exploiting your public position with the Town for the private benefit of yourself or your employer. Also, you should not act as an advocate for your employer on any matter before the board.

Inasmuch as you will likely be dealing with other Town departments due to your position as General Manager you should take care not to utilize your position on the Tourist Advisory Board to get any special privileges or benefits for yourself or your employer due to your public position. That does not mean that you cannot deal on a regular basis with Town officials or employees in the course of your private job duties, only that you should not be in the habit of mentioning your position in the Town or in any using your position to gain any advantage in such interactions.

Please be aware that as an advisory board member you will need to file an annual financial disclosure form under Section 2-11.1(i), and will be required to comply with the Florida Government-in-the-Sunshine law, which I assume the Town Attorney will be informing you about.

I have attached a copy of a summary of the ethical guidelines applicable to advisory board members for your reference.

Sincerely,

Joseph M. Centorino

Executive Director and General Counsel Miami-Dade Commission on Ethics and Public Trust 19 W. Flagler Street, Suite 820 Miami, FL 33130

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