
FW: INQ 16-48 Benford

From: Centorino, Joseph (COE)

Sent: Thursday, February 18, 2016 4:34 PM

To: Benford, Russell (Office of the Mayor) <benford@miamidade.gov>

Cc: Ferro, Alex (Office of the Mayor) <aferro@miamidade.gov>; Price-Williams, Abigail (CAO) <APW1@miamidade.gov>; Sanchez, Gerald (CAO) <gks@miamidade.gov>; Perez, Martha D. (COE) <perezmd@miamidade.gov>; Diaz-Greco, Gilma M. (COE) <GDIAZGR@miamidade.gov>

Subject: INQ 16-48 Russell Benford, Deputy Mayor, Miami-Dade County (Conflict of Interest)

Mr. Benford:

You have inquired regarding whether there is potential conflict of interest involved for you in connection with the procurement process involving proposals for the redevelopment project known as Liberty Square Rising. This project is part of the redevelopment process managed by the Public Housing and Community Development Department (PHCD), over which you are assigned to provide oversight on behalf of the administration. The Mayor has requested “Best and Final” proposals from two respondents to the project—Atlantic Pacific Communities and Related Urban.

It has come to your attention that Related Urban has included in its application a service provider named 100 Black Men of South Florida, a non-profit organization, which would occupy 5000 square feet of space in the project and be its permanent home in providing mentorship and intervention services to you men and an empowerment program for middle-school students. Your inquiry has been made in light of the fact that you are a volunteer, non-voting member of the organization and are involved in the group’s Annual College and Career Expo. You receive no compensation from the organization and have no financial interest personal financial stake in its operations. You do not personally stand to benefit from its involvement in this project. You also have no role in the procurement process for this project; you do not sit on the evaluation committee; and you do not make a recommendation to the Mayor whose own recommendation will go to the County Commission for approval. Your role would be limited to signing off on paperwork as the Deputy Mayor over PHCD and possibly appearing before the County Commission when it considers the Mayor’s recommendation on the project.

Under the circumstances that you have related, there is no prohibited conflict of interest for you under any provision of the Miami-Dade County Code of Ethics. Since the group of which you are a member is a non-profit entity in which you have no financial interest, you are not prohibited from participating in official action on this project under Section 2-11.1(n), nor does it appear that your involvement could in any way constitute an Exploitation of Official Position under Section 2-11.1(g) due to your very limited involvement in the process leading to ultimate approval on the project.

Given your membership in a non-profit organization that that is a potential service provider and does stand to be positively affected by the project, you have indicated you will ask to be removed from any oversight responsibility for PHCD in the approval process in order to avoid any possible perception of impropriety due to your association with the organization. While this is not required by any provision of the Ethics Code, your sensitivity to appearance issues that may result from that association reflects a commitment to a high standard of ethics in your County service.

Sincerely,

Joe Centorino

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
Tel: (305) 579-2594
Fax: (305) 579-0273
ethics.miamidade.gov



From: Benford, Russell (Office of the Mayor)
Sent: Thursday, February 18, 2016 3:20 PM
To: Centorino, Joseph (COE) <CENTORI@miamidade.gov>
Cc: Ferro, Alex (Office of the Mayor) <aferro@miamidade.gov>; Price-Williams, Abigail (CAO) <APW1@miamidade.gov>; Smith, Terrence (CAO) <ASMITH@miamidade.gov>; Benitez, Hugo (CAO) <HEB2@miamidade.gov>; Liu, Michael (PHCD) <mliu88@miamidade.gov>
Subject: Opinion Requested

Mr. Centorino,

Good afternoon. Miami-Dade County is in the process of soliciting proposals for the redevelopment of the Liberty Square and Lincoln Gardens Public Housing communities. The project is commonly known as "Liberty Square Rising". As a part of the redevelopment process, managed by the Public Housing and Community Development Department, the Mayor has requested "Best and Final" proposals from Atlantic Pacific Communities and Related Urban. Upon my review of the Best and Final application submitted by Related Urban I discovered that the document included the addition of a service provider called 100 Black Men of South Florida. It is proposed that the 100 Black Men of South Florida would occupy 5,000 square feet of space within Liberty Square to provide mentorship and intervention services to young men beginning in the 7th grade through their matriculation into college, provide an empowerment program for middle school students of all backgrounds and serve as a "permanent home" for the organization. I do not know what is meant by "permanent home" because the organization has no employees or office space.

I am a volunteer, non-voting member of 100 Black Men of South Florida. The 100 Black Men of South Florida is a non-profit organization and its mission is to provide mentorship to young men. Specifically, my participation in the organization is solely my work on the annual College and Career Expo which brings together 5,000 Miami-Dade County Public School students together with over 100 universities and colleges as well as approximately 100 potential employers to facilitate college attendance and employment opportunities.

With respect to the procurement process, I have no role in the application evaluation and ranking. I am not a member of the evaluation committee nor do I make a recommendation to the Mayor with respect to this project.

In an abundance of caution, I will ask to be removed from this project with respect to my responsibility as the Deputy Mayor with oversight of the Public Housing and Community Development Department. I respectfully request your opinion as it relates to the potential of a conflict of interest and recusal from this project.

Russell Benford
Deputy Mayor
Miami-Dade County
111 NW First Street - Suite 2910
Miami, FL 33128
Phone: 305.375.5141 ~ Fax: 305.372.6082
benford@miamidade.gov

"Delivering Excellence Everyday"

**All Lobbyists must register prior to any meeting with the Deputy Mayor.
Lobbyists Register: Clerk of the Board, 111 NW 1st Street, 17th Floor
Contact Person: Claude Francis at 305.375.5137**