

**Frigo, Victoria (COE)**

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**From:** Frigo, Victoria (COE)  
**Sent:** Wednesday, September 07, 2011 11:49 AM  
**To:** 'Jordan Leonard'  
**Subject:** RE: Bay Harbor Islands Opinion (INQ 11-134)

Dear Councilman Leonard,

This is to confirm that the Ethics Commission staff finds that you do not have a voting conflict regarding Agenda Item #24 scheduled to come before the Bay Harbor Islands Town Council next week.

The item to be discussed involves an RFP to lease space in a garage owned by the Town. The sole responder to the RFP is the principal of a private school. You have no business or other prohibited relationship with the school, and you will not be affected in a manner distinct from the public generally if this bidder is successful or unsuccessful in renting the space from the Town. See Miami-Dade Ethics Code at Sec. 2-11.1 (d), RQO 05-24, and RQO 05-108.

Thank you for advising us that, through a private company owned by you and your wife, your wife has had a private professional relationship with this individual. This fact is not germane because the private professional relationship is completely unrelated to the school. Additionally, your child's attending an introductory music class at another venue of the school and receiving a discount available to the public generally does not affect the conclusion.

If you have additional questions, please feel free to contact me.

Sincerely,

VICTORIA FRIGO, STAFF ATTORNEY  
DIRECT PHONE: 305 350-0601  
FAX: 305 579-0273

 **miamidade.gov**  
19 WEST FLAGLER ST., SUITE 820  
MIAMI, FL 33130

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**From:** Jordan Leonard [<mailto:jwlmiami@yahoo.com>]  
**Sent:** Tuesday, September 06, 2011 9:47 PM  
**To:** Frigo, Victoria (COE)  
**Subject:** Re: Bay Harbor Islands Opinion

Ms. Frigo,

As per our conversation today, I respectfully request guidance regarding a possible conflict on an item that will come before the Bay Harbor Islands Town Council next Monday, for which I serve as a Councilman.

The Town Manager has asked for guidance concerning the single response to a Town RFP for leasing space for commercial use within a public facility (garage). The principal of the company that responded has a private business relationship with a business that I am a minority owner. As previously discussed, I am not allowed to elaborate further due to HIPPA federal regulations. I can say that I have never had a financial interest and currently do not have a business relationship with the business that has applied. My wife has previously taken our minor child to their facility (only on three occasions) in Sunny Isles Beach and was afforded, to my knowledge, a discount for their services of introducing music to our baby boy. At the time the owners were not aware of my position as a Councilman and I was not a minority owner in our business. I also have never discussed the RFP with the applicant. I will note that the business that applied, FasTrackKids is planning on opening a day school and the business that I partially own, with my wife, is a therapy practice for children. My wife and I have never discussed any mutual business relationship with the owner pertaining to FasTrackKids expanding into Bay Harbor Islands.

The agenda item (#24), along with the Manager's memo can be found at bayharborislands.org.

Please state in writing if there is a conflict. If so, I will abstain from discussing and voting on the item. If not, I intend on participating as a Councilman.

Thank you again,

Jordan W. Leonard  
Councilman  
Town of Bay Harbor Islands

cell 305 206-8497

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**From:** "Frigo, Victoria (COE)" <FRIGOV@miamidade.gov>  
**To:** [jwlmiami@yahoo.com](mailto:jwlmiami@yahoo.com)  
**Sent:** Tuesday, September 6, 2011 4:38 PM  
**Subject:** My contact information

**Victoria Frigo, Staff Attorney**

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