

Frigo, Victoria (COE)

From: Frigo, Victoria (COE)
Sent: Thursday, December 01, 2011 11:54 AM
To: 'Patriciar@FarmShare.org'
Cc: Centorino, Joseph (COE); Wall, Daniel (OMB); Rivero, Felipe M. (OMB); Thompson, Robert A. (COE)
Subject: Board Conflicts (INQ 11-178)

TO: Patricia Robbins, CBO Advisory Board Member & Chair of Farm Share, Inc.

Ms. Robbins,

This is in response to your question about possible conflicts of interest associated with your service on the Community-Based Organization (CBO) Advisory Board and your daughter's and your affiliation with the nonprofit organization, Farm Share, Inc.

We understand that you serve as Chair of the nonprofit organization, and your daughter is an employee with the organization. Farm Share, Inc., receives County funds based on the recommendation of the CBO Advisory Board.

This arrangement suggests several possible ethics conflicts:

Voting conflicts, Sec. 2-11.1 (v)

You may *not* vote as a member of the CBO Advisory Board on any matter affecting Farm Share, Inc., as long as you are an officer of Farm Share, Inc., *and* you are directly affected by your daughter's salary. Even if your daughter's salary does not directly affect you, an appearance of impropriety is likely to occur if you vote to fund Farm Share, Inc., while she receives a salary there.

Prohibited appearances, Sec. 2-11.1 (m)(2)

You may not appear at public meetings before the CBO Advisory Board seeking funding or any other benefit on behalf of Farm Share, Inc. In addition, you may not submit documents or correspondence, attend meetings with staff or in any way lobby your board and its staff on behalf of Farm Share, Inc.

Avoiding exploitation of official position, Sec. 2-11.1 (g)

You may not use or attempt to use your official position as a CBO Advisory Board member to secure special privileges and exemptions for yourself, your daughter, Farm Share, Inc., or others.

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

Sincerely,

VICTORIA FRIGO, STAFF ATTORNEY

Phone: 305 350-0601

Fax: 305 579-0273



19 West Flagler St., Suite 820
Miami, FL 33130

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From: Patricia Robbins [<mailto:Patriciar@FarmShare.org>]

Sent: Tuesday, November 29, 2011 11:02 AM

To: Sanchez, Rodzandra (COE)

Subject: Question for Mr. Centorino

Dear Mr. Centorino:

I am writing in the hopes that you can provide us with an informal opinion on the issue of conflict of interest as it relates to our contractual relationship with Miami-Dade County. Specifically, if a Farm Share employee is the family member of a Farm Share board member, and this employee's salary is paid from Miami-Dade County contractual funding, could this create a conflict of interest which may be in violation of our contractual terms or Miami-Dade County Ordinances? It is my understanding that the answer to this question would be no. My reading of the contract and Miami Dade Ord. No 72-82, and my understanding of the issue as explained during our "Ethics and Conflict of Interest" class is that only conflicts of interest between contractors and Miami-Dade County personnel charged with making decisions which may benefit contractors are relevant. Is this correct?

Thank you for your attention to this matter.

I attended your class downtown. You said if I ever had any questions, call you. We discussed this in class that day and you said there was no conflict. I just wanted to be sure nothing has changed.

Thank you.

Patricia Robbins
Founder & Chairman
Farm Share, Inc.
305-458-7316 cell