

Frigo, Victoria (COE)

From: Frigo, Victoria (COE)
Sent: Thursday, August 01, 2013 2:34 PM
To: htoney@mdc.edu
Cc: Centorino, Joseph (COE); Diaz-Greco, Gilma M. (COE); Thompson, Robert A. (COE); Simmons, William A. (MDEAT)
Subject: Addendum Miami Dade Economic Advocacy Trust (INQ 13-187)

Ms. Toney,

This communication is meant to expand on the informal ethics opinion you received regarding prohibitions on appearances before County boards on behalf of third parties. *See* the Miami-Dade County Code at Sec. 2-11.1 (m)(2).

The facts you presented yesterday indicate that you are not in violation of this provision.

You stated that you receive no personal financial benefits whatsoever resulting from Miami-Dade Economic Advocacy Trust (MDEAT) initiatives, programs, or service contracts involving your employer--the Meek Entrepreneurial Education Center (EEC) at Miami-Dade College.

Furthermore, you do not individually present any program suggestions directly to the MDEAT board for final action. Rather, action items are developed at the committee level and proposed to the board by the committee.

And although you serve on an action committee, the decisions of the committee are made through a democratic voting process where your vote weighs equally with all other committee members' votes.

In light of these circumstances, you are free to continue to discuss and make suggestions at MDEAT board and committee meetings regarding the resources that can be provided by the EEC.

As we discussed, the intent of this provision is not to chill your unique contributions as a MDEAT board member. Again, thank you for your service.

Sincerely,

VICTORIA FRIGO, SENIOR STAFF ATTORNEY

Direct Phone: 305 350-0601
Main Number: 305 579-2594
Fax: 305 579-0273



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

Miami-Dade County is a public entity subject to Chapter 119 of the Florida Statutes concerning public records. E-mail messages are covered under such laws and thus subject to disclosure.

From: Frigo, Victoria (COE)
Sent: Tuesday, July 30, 2013 4:55 PM
To: 'htoney@mdc.edu'
Cc: Centorino, Joseph (COE); Diaz-Greco, Gilma M. (COE); Thompson, Robert A. (COE)
Subject: Miami Dade Economic Advocacy Trust (INQ 13-187)

Ms. Toney,

As a member of the Miami-Dade Economic Advocacy Trust (MDEAT), you asked for clarification regarding presenting suggestions to your board that may ultimately result in direct benefits to your employer—the Meek Entrepreneurial Education Center (EEC) at Miami-Dade College.

The County Ethics Code at Sec. 2-11.1 (m)(2) prohibits you from appearing before the MDEAT, either directly or through an associate, to seek a benefit on behalf of your employer. Additionally, you may not vote on matters involving your employer if you will be directly affected by the vote. *See* County Ethics Code at Sec. 2-11.1 (v).

In order to prevent possible inferences of cronyism, you must avoid *personally* sponsoring initiatives before the MDEAT that will *directly benefit* the EEC. On the other hand, you may continue to share your expertise with the MDEAT board members and subcommittee members as well as vote on matters involving the EEC, as long as you are not directly affected by the action of the MDEAT.

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

Sincerely,

VICTORIA FRIGO, SENIOR STAFF ATTORNEY

Direct Phone: 305 350-0601
Main Number: 305 579-2594
Fax: 305 579-0273



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

Miami-Dade County is a public entity subject to Chapter 119 of the Florida Statutes concerning public records. E-mail messages are covered under such laws and thus subject to disclosure.

From: Toney, H. Leigh [htoney@mdc.edu]
Sent: Tuesday, July 23, 2013 2:50 PM
To: Thompson, Robert A. (COE)
Cc: Dixon, John (MDEAT); Toney, H. Leigh
Subject: Board Member, Miami Dade Economic Advocacy Trust -- Opinion Sought

Mr. Thompson:

You may recall speaking with me several months ago about my role on the MDEAT Advisory Board. I also serve on the MDEAT Economic Development Action Committee. My formal job is as Executive Director of the Miami Dade College, Meek Entrepreneurial Education Center. Given my background and expertise in entrepreneurship and economic development, I quite often bring forward entrepreneurship/economic development initiatives for the Board to consider for funding. In some instances, the College may ultimately be chosen as the provider/vendor to deliver said services in support of these initiatives. Given that I often am an “idea/project” generator – and I work for the College which at times may be chosen as a service provider/contractor for MDEAT – I would like a written opinion from your office as to whether my official position with Miami Dade College and my service on the MDEAT Board pose any type of conflict of interest in cases where the College is a service provider.

I endeavor to be a productive member of the Board by bring forth constructive and innovative strategies, however, I need to ensure that my personal and professional interests are not compromised in any way as a result of my efforts to dutifully serve on the MDEAT Board.

Regards,

H. Leigh Toney
Executive Director
Miami Dade College, North Campus
Carrie P. Meek Entrepreneurial Education Center
6300 NW 7th Avenue
Miami, FL 33150
(305) 237-1999 – Phone
(305) 237-1998 – Facsimile
htoney@mdc.edu<mailto:htoney@mdc.edu>