

## Frigo, Victoria (COE)

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**From:** Frigo, Victoria (COE)  
**Sent:** Tuesday, October 01, 2013 3:50 PM  
**To:** Martin, Alphermeia (OMB)  
**Cc:** Centorino, Joseph (COE); Diaz-Greco, Gilma M. (COE); Penichet, Breno P. (COE)  
**Subject:** COMMITTEE RECOMMENDATIONS (INQ 13-239)  
**Attachments:** AG Opinion Oct\_28\_09.pdf

Ms. Martin,

Under the Sunshine Law, board members of the Youth Crime Task Force (YCTF) cannot communicate with each other on topics that may come before the board outside of a public meeting. They cannot use you as a conduit to communicate with each other. Therefore, you cannot transmit the email referenced below from one board member to the chair of the board. (See Fla. Stat. 286.011 and the attached Informal AG Opinion that covers similar situations.)

Additionally, a board member cannot attempt to influence her own board to obtain a benefit for a nonprofit entity that employs her. Additionally, an associate of the board member cannot address the board to seek the benefit on behalf of the entity. (See County Ethics Code at Sec. 2-11.1 (m)(2).)

To avoid a conflict of interest, a board member with a question about how a matter was decided may raise her question at a public meeting, but she cannot engage in a dialogue or any discussion whatsoever to attempt to influence the decision of the board or a committee of the board, because that would violate the ethics provision cited above.

Our agency is concerned about potential ethics violations occurring at YCTF meetings and is currently investigating these matters. **We are prepared to file ethics complaints against board members who violate the County Ethics Code. Penalties can include fines between \$500 to \$1,000 for each separate violation. The Ethics Commission may also recommend that a violator be removed from the board.**

Please feel free to contact our office if we can be of further assistance.

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

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**From:** Martin, Alphermeia (OMB)  
**Sent:** Tuesday, October 01, 2013 11:14 AM  
**To:** Frigo, Victoria (COE)  
**Subject:** FW: MODEL PROGRAMS COMMITTEE RECOMMENDATIONS

Good Morning Ms. Frigo, I hope all is well.

The below email is from Ms. Thema Campbell, who is a Youth Crime Task Force (YCTF) board member, who has asked that I forward an email to the Ms. Marie Osborne, the YCTF Chair, regarding concerns with funding recommendations made by the board that could affect a program that she directs.

I am drafting a response to Ms. Campbell to address the prohibitions of board-related communications between board members outside of a duly noticed, public meeting. However, I need your opinion on if her inquiries regarding this to board members made at a public board meeting are conflicts of the code of ethics, being that Ms. Campbell is a YCTF board member, she directs an organization that receives funding from the County, and that organization is affected by recommendations made by the YCTF.

If this is a conflict of interest, what would be the proper way for her to inquire about her concerns without violating any rules.

My ACA recommended that I consult with you on this. I'll await your response to in order to appropriately respond to Mr. Campbell.

Thank you.

Best Regards,

**Alphermelia "Pam" Martin**

Special Projects Administrator

**Office of Management and Budget**

Grants Coordination

111 NW 1st Street, 19th Floor

Miami, Florida 33128

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 *Please consider the environment before printing this email.*

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**From:** Thema Campbell [<mailto:thema@girlpowerrocks.org>]

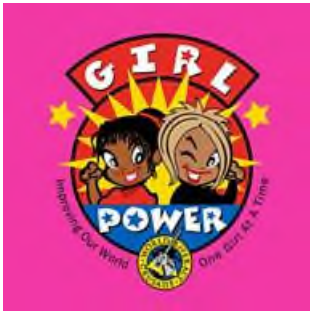
**Sent:** Tuesday, September 17, 2013 1:57 PM

**To:** 'Martin, Alphermelia (OMB)'

**Subject:** MODEL PROGRAMS COMMITTEE RECOMMENDATIONS

Hi Pam, This email is for Chair Marie Osborne.

I have very strong objections to the Model Program Committee Recommendations. According to the Recommendations Girls Post Detention Program is not recommended as a Priority Area. Also there is no mention on the Funding Allocation Worksheet for Girls Post Detention Program. I would like a full explanation for not including Girls Post Detention Program in the Model Program Recommendations and from the Funding Allocation Worksheet.



*Thema Campbell*, President/CEO  
World Literacy Crusade of FL, Inc.  
Girl Power  
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