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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Monday, July 13, 2015 2:07 PM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** George Vallejo, Mayor, City of North Miami Beach (Conflict of Interest) INQ 15-149

INQ 15-149 Vallejo

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**From:** Centorino, Joseph (COE)  
**Sent:** Monday, July 13, 2015 12:56 PM  
**To:** 'George Vallejo'  
**Cc:** Diaz-Greco, Gilma M. (COE); Perez, Martha D. (COE)  
**Subject:** 15-149 George Vallejo, Mayor, City of North Miami Beach (Conflict of Interest)

Mayor Vallejo:

You have inquired regarding whether there is any prohibited conflict of interest in your involvement in a real estate transaction in North Miami Beach as the selling broker in the transaction. Your involvement arises out of your private business as a licensed real estate broker. The transaction has no relationship to your position as Mayor or as a member of the City Council or the City's CRA Board. There is foreseeable vote or other action that you may take in any of the those capacities that would have a direct impact on this transaction or on the commission that you anticipate receiving. Under these circumstances, there is no conflict of interest involved where this is a purely private transaction without any nexus to your public position or to the City government of North Miami Beach. Accordingly, I see no reason that you should not be involved in the transaction. There is no prohibited conflict of interest.

Sincerely,

Joseph M. Centorino  
Executive Director and General Counsel  
Miami-Dade Commission on Ethics and Public Trust

**From:** George Vallejo [<mailto:george@georgevallejo.com>]  
**Sent:** Monday, July 13, 2015 12:39 PM  
**To:** Centorino, Joseph (COE)  
**Subject:** Request for clarification whether a conflict exists or not

Dear Mr. Centorino,

I would like some additional clarification regarding a real estate transaction I'm involved with in my private capacity and whether or not this involves any conflicts with regard to my role as an elected official. Below are the pertinent facts and the question.

Summary of facts:

- In my elected capacity, I am the Mayor of North Miami Beach and serve as a voting member of the City Council as well as the City's CRA Board.
- In my private employment, I am a licensed Real Estate Broker and 100% owner of my licensed Real Estate Brokerage business.

- A property owner listed one of his commercial properties with another broker. The property sits inside the city limits.
- The subject property is an existing warehouse property rented to various tenants and I do NOT have any ownership interest in this property nor with any of the tenants.
- The listing broker advertised this property in a multiple-listing service and, as is customary, offered a commission to any selling broker who procured a buyer.
- I, in my capacity as a broker, presented this property to several different potential purchasers to see if they were interested in making an offer to purchase.
- The seller, having received several offers from various brokers, called for all interested parties to submit their highest & final offer by Friday, July 10th, 2015.
- One of the parties I procured has submitted what appears to be the best offer and the seller would like to proceed to contract and sell to them.
- The purchase offer is NOT contingent on any City Council nor City CRA actions or votes.
- My role here is strictly as a Real Estate Broker and stand to be paid a commission should there be a successful closing with this, or any other, buyer that I procured.

Now, the question:

- Is there any conflict for me to proceed as the Selling Broker in this transaction and be paid the commission upon a successful sale?

Please provide me an answer to this question so that I may know how to proceed with this transaction. If you need any additional information, please let me know. As always, I thank you for your prompt attention and guidance on this matter.

Regards,  
George Vallejo