



**DRAFT**

June 27, 2002

Commissioner Dorrin D. Rolle  
District Two  
111 N.W. 1<sup>st</sup> Street, Suite 220  
Miami, FL 33128

**ETHICS COMMISSIONERS**

Kerry E. Rosenthal, Chairman  
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EXECUTIVE DIRECTOR

**MICHAEL P. MURAWSKI**  
ADVOCATE

**ARDYTH WALKER**  
STAFF GENERAL COUNSEL

Dear Commissioner Rolle,

Thank you for calling a meeting earlier this week with Murray Greenberg and Gerald Sanchez from the County Attorney's Office and me to clarify how the County's Code of Ethics and Conflict of Interest Ordinance applies to you as a County Commissioner and president of JESCA, a not-for-profit agency based in Miami-Dade County. We addressed a number of points, which you have asked me to summarize. As you know, there must be a clear line of separation between your duties as a county commissioner and your responsibilities as the head of an agency located in Miami-Dade County. However, standards should not be imposed upon you that unnecessarily hamper your ability to effectively serve your community as an elected official or hinder your ability to manage your agency. Our conversation covered two major areas: 1) potential voting conflicts and 2) gift solicitations. I recommend the following courses of action:

- 1) Voting conflicts -- To avoid potential voting conflicts, you must not participate in or vote on any matters coming before the Board of County Commissioners or any of its committees involving JESCA. I strongly suggest you absent yourself from any proceeding or discussion when the subject of JESCA is raised.
- 2) Gift solicitation -- You indicated that fundraising is a necessary component of your job at JESCA and you may, on occasion, directly take part in these activities. You advised me that letters of solicitation prepared on behalf of your agency are generally signed by the chairman or vice-chairman of the your Board of Directors and your name does not appear in these solicitation letters. I find this is the prudent approach and when you must solicit gifts or donations to JESCA, you state clearly that you are doing so in your position as president of the organization, not as a county commissioner. Moreover, any campaign mounted by your agency to increasing funding ought to be broadly based. In other words, you would be creating an appearance of impropriety, at the very least, if you targeted your fundraising efforts to those individuals and firms doing business with the County, seeking to business with the County or only those who have given to your political campaign in the past. Finally, I know you understand how important it is to avoid using your County letterhead or other trappings of your office to benefit your agency.



Please use the above as guiding principles but understand that if other circumstances arise that require clarification or an ethics opinion, feel free to contact me at your earliest convenience.

Sincerely,

Robert Meyers

cc: Murray Greenberg, Esq., Office of the County Attorney  
Gerald Sanchez, Esq., Office of the County Attorney

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