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Miami-Dade County Commission on Ethics and Public Trust

Memo

To: File,

From: Michael P. Murawski, Independent Advocate

Date: September 24, 2009

Re: K 09- 084 Crosswinds – Close Out Memorandum

After reviewing the summary of the statements provided by Joe Centorino Division Chief, Public Corruption, Miami-Dade States Attorney Office prepared by COE Investigators I have determined that;

1. City of Miami Commissioner Michelle Spence-Jones contacted Crosswinds Developers executives (a privately owned development company) and recommended the employment of a firm owned by an associate Barbara Hardemon to provide public relations services.
2. The Miami Dade County Conflict of Interest and Code of Ethics Ordinance 2-11.1 (p) *Recommending Professional Services*, prohibits the recommendation of any public relations firm to assist in any transaction involving a municipality or any of its agencies.
3. Commissioner Michelle Spence-Jones did not violate the Miami Dade Conflict of Interest and Code of Ethics because Crosswinds is not a municipal agency.

The investigation is closed. If additional information is developed the investigation may be reopened.