



**Miami-Dade Commission on Ethics & Public Trust**

Investigative Report

**Investigators:** Manuel W. Diaz

<b>Case No.:</b> K12-024	<b>Case Name:</b> City of Miami NANA	<u>Date Open:</u>	<u>Date Closed:</u>
<b>Complainant(s):</b>	<b>Subject(s):</b>	<b>February 8, 2012</b>	<b>November 25, 2013</b>

**Allegation(s):**

On February 8 2012, The Miami Herald columnist Michael Putney (Putney) questioned the City of Miami’s decision to use Community Development Block Grant (CGBD) funds for four (4) store-front renovations along 7<sup>th</sup> Avenue (Project, Neighbors and Neighbors, Inc. (PF&I-B10)D5a)). The renovations were to be overseen by the Florida not-for-profit, Neighbors for Neighbors Association, Inc. (NANA). Putney questioned why the funds were being used to renovate facades of privately owned buildings and not used for training programs to help the unemployed to find work.

The COE contacted the City of Miami’s Department of Community Development and advised that the COE Auditor Christina Seymour (Seymour) would monitor the use of CGBD funds by NANA to insure compliance.

**Relevant Ordinances:**

Miami Dade County Conflict of Interest and Code of Ethics Ordinance  
Sec 2-11.1

(g) *Exploitation of official position prohibited.*  
“No person included in the terms defined in Subsections (b)(1) through (6) and (b)(13) shall use or attempt to use his or her official position to secure special privileges or exemptions for himself or her or others except as may be specifically permitted by other ordinances and resolutions previously ordained or adopted or hereafter to be ordained or adopted by the Board of County Commissioners”



## **Investigation:**

### ***Interviews***

K12-024 was assigned to Seymour. Seymour had the responsibility of reviewing documents reflecting the expenditures of the funds. This investigator was tasked with the responsibility of assisting Seymour in obtaining any documents that she needed for the monitoring process.

Seymour left the COE in late 2012. The case was re-assigned to this writer.

Seymour's case file includes documents which were produced by the City of Miami as a result of public record requests and a COE subpoena that was issued to NANA for documents reflecting the expenditure of CGBD funds.

The estimated 1,500 pages of documents were reviewed. The documents reviewed seem to be in compliance with what was requested by Seymour.

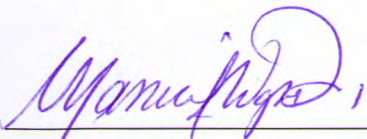
In February 2013, I contacted George Mensah (Mensah), City of Miami Director of Community Development (CD). Mensah advised that the four projects funded through CGBD were completed and that his department is waiting for NANA to submit invoices to complete the reimbursement process. He noted that since CDBG funds were used, all work, by NANA and contractors, was monitored by CD and audited by the Finance Unit to insure that all expenditures were within the guidelines provided for the use of CGBD funds.

On June 23, 2013, Mensah was re-contacted. He advised that NANA had not submitted the invoices and the reimbursements had not been finalized. Mensah agreed to contact the NANA representatives in an attempt to expedite their response. He advised that when CD received the documents from NANA, the Finance Unit will audit and the project file can be closed.

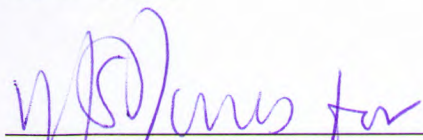
On November 25, 2013, Mensah provided the attached document (Close-Out Package Confirmation). The document indicates that the expenditures from CGBD funds allocated to the Project, Neighbors and Neighbors, Inc. (PF&I-B10)D5a, have been audited and properly accounted for.

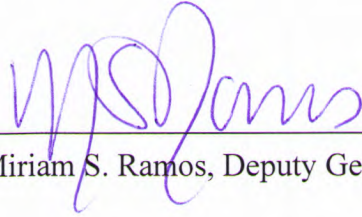
**Conclusion:**

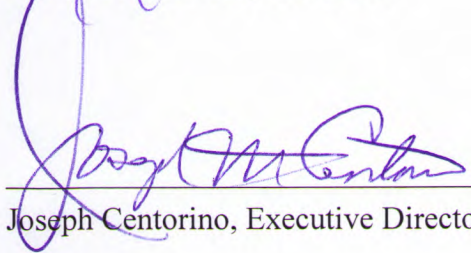
Given that the funds have been audited and properly accounted for by the City of Miami the instant case is closed without further action.

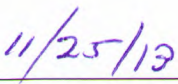
  
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Manuel W. Diaz, COE Investigator

Approved by:

  
\_\_\_\_\_  
Michael Murawski, Advocate

  
\_\_\_\_\_  
Miriam S. Ramos, Deputy General Counsel

  
\_\_\_\_\_  
Joseph Centorino, Executive Director

  
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Date