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

Memorandum

To: Michael Murawski, COE Advocate **File: PI15-011** **Date: April 16, 2015**

From: Robert Steinback

Re: Edward Silva

This inquiry was instigated by an anonymous correspondence received by this office via U.S. Mail. The letter noted that the Village of Palmetto Bay on April 1, 2015, named Edward Silva (Silva), the village's director of the Building and Capital Projects Department, to the post of Interim Village Manager.

The letter noted Silva's involvement with a company called E.S.A. Inc. Architectural Planning Design (E.S.A.). Silva announced that he would not discontinue his work for this company even with the appointment as Interim Village Manager. Without providing specific allegations of a conflict of interest, the letter suggested that E.S.A. "stands to gain either directly or indirectly through clients, business partners or proxies" thanks to Silva's position.

A search of state corporate records show that Edward Silva is the president and registered agent for E.S.A.

The letter writer raised additional issues of Silva's alleged "very close personal relationship" with Palmetto Bay's Human Resources Director; criticized his management style; suggested that "the fox is guarding the henhouse" because Silva's son is married to the daughter of Palmetto Bay's Village Attorney, Dexter Lehtinen, who allegedly recommended a pay raise for Silva to the Village Council; and that Silva may have undue influence over the selection of a permanent Village Manager.

None of these matters raises any potential issues under the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance, nor the Citizens' Bill of Rights.

By way of a public records request, the investigator obtained from the office of the village clerk for Palmetto Bay copies of Silva's Outside Employment Statements for the years 2009 through 2014.

The investigator finds no further Ethics matter to pursue regarding this investigation.