



**CASE
CLOSED**

Date: 5-15-19

**MIAMI-DADE COMMISSION ON ETHICS AND PUBLIC TRUST
INVESTIGATION MEMORANDUM**

TO: José Arrojo, Executive Director
Michael Murawski, Advocate
Martha Perez, Staff Attorney

FROM: Nilda Olmo, Investigator

RE: Commissioner Manolo Reyes, K19-15

DATE: May 08, 2019

An inquiry was made to the Commission on Ethics seeking guidance regarding a possible voting conflict by City of Miami Commissioner Manolo Reyes (Commissioner Reyes) on an item involving the Lobbyist/Law Firm Becker & Poliakoff, P.A. (Becker).¹ Manuel “Manny” Reyes (Reyes) is the Commissioner’s son, a lobbyist, and subcontractor to Becker.

Relevant Law:

1. 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 Subsection (b) (1) through (6) and (b) (13) shall use or attempt to use his or her official position to secure privileges or exemptions for himself or herself 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.
2. Miami-Dade County Conflict of Interest and Code of Ethics Ordinance, Sec. 2-11.1(d) *Voting conflict*. Additionally, no person included in the term defined in Subsection (b)(1) shall vote on or participate in any way in any matter presented to the Board of County Commissioners if said person has any of the following relationships with any of the persons or entities which would be or might directly or indirectly affected by any action of Board of County Commissioners...

¹ Becker & Poliakoff with headquarters’ located at 1 East Broward Blvd., Ft. Lauderdale, FL, is a multi-practice commercial law firm that includes attorneys, lobbyist and other professionals throughout Florida, extending to New York, New Jersey and Washington, D.C. Their practice areas include, but not limited to Corporate, Government Law & Lobbying, Land Use and Zoning Law, Business Litigation and Real Estate.

Reyes is the Vice-President of Pereira Reyes Consulting Inc. (PRC), located at 2520 Coral Way, Miami, Florida, active since December 18, 2017. The Miami-Dade County Clerk of the Board-Lobbyist Registration & Reports show Reyes registered on behalf of several local principals.

As a subcontractor to Becker, PRC represents local government and public agencies i.e., Miami Dade Expressway Authority, Metro-Dade Fire Fighters Local 1403, Village of Pinecrest and City of South Miami.

City of Miami lobbyist search notes no lobbyist registration for Reyes.

On February 14, 2019, in the Regular Commission meeting, Resolution R-19-0073 was adopted by a unanimous vote. Commissioner Reyes participated and voted on said Resolution:

A RESOLUTION OF THE MIAMI CITY COMMISSION APPROVING THE CONTINUATION OF THE PROFESSIONAL SERVICES OF BECKER POLIAKOFF, SOUTHERN STRATEGY GROUP, AND RUBIN, TURNBULL & ASSOCIATES, F/K/A THE RUBIN GROUP, AS THE CITY OF MIAMI'S LOBBYING FIRMS, UNTIL SUCH TIME AS A REQUEST FOR LETTERS OF INTEREST ("RFLI") OR A SIMILAR COMPETITIVE SOLICITATION IS FINALIZED AND BROUGHT BEFORE THE CITY COMMISSION FOR AN AWARD; FURTHER INSTRUCTING THE CITY ADMINISTRATIO TO DRAFT SUCH RFLI OR SIMILAR SOLICITATION, IN A FORM ACCEPTABLE TO THE CITY ATTORNEY, WHICH SHALL BE PRESETED FOR REVIEW, COMMENT, AND APPROVAL BY THE CITY COMMISSION, NO LATER THAN THE FIRST WEEK OF THE END OF EITHER THE 2019 REULAR FLORIDA LEGISLATIVE SESSION OR A SPECIAL LEGISLATIVE SESSION, IF CONVENED, AND PRIOR TO ITS ISSUANCE

In response to the inquiry on April 23, 2019, the Commission on Ethics issued INQ 19-46 to Commissioner Reyes, Victoria Mendez, Esq., City of Miami Attorney and George Wysong, Esq., Assistant City Attorney.² Also, RQO 19-02 is attached as part of the exhibits.

Documents/Exhibits:

Miami-Dade County Clerk of the Board-Lobbyist Registration & Reports
City of Miami Lobbyist Registration
City of Miami Commission Meeting Agenda, February 14, 2019
Commission on Ethics INQ 19-46
Commission on Ethics RQO 19-02

² INQ 19-46 concluded that, if Reyes has been engaged on a matter being considered by the City of Miami Commission, then Commissioner Reyes should not vote or participate on that matter.



Nilda Olmo, COE Investigator

5/15/19

Date

Approved by:



Michael Murawski, Advocate

 5/13/19

José Arrojo, Executive Director



Martha Perez, Staff Attorney