



**CASE
CLOSED**

Date: 5/28/19

Miami-Dade Commission on Ethics & Public Trust
Investigative Report

Investigator: Nilda Olmo

Case No.: PI 19-17

Complainant: N/A

Subject/Case Name: Rachel Dooley

Date Opened: 04/05/19

Date Submitted: 05/16/19

Allegation(s):

On April 2, 2019, a half-page ad entitled, “Wanna See How F1Miami Really Works? Look Under The Hood.”, followed by an e-mail from Formula 1 Managing Director-Commercial Operations Sean R.H. Bratches (Bratches) to Assistant City of Miami Attorney Rachel Dooley (Dooley), and referencing SEC.2-11.1.-Miami-Dade County Conflict of Interest and Code of Ethics Ordinance, appeared on the Miami Herald.¹

Included in the ad was an e-mail dated October 10, 2018, where Bratches thanked Dooley for her support, and extended an invitation to the Formula 1 Fan Festival on October 20, 2019, noting, “We will provide you with full credentials and VIP access.”

Relevant Law:

Miami-Dade County Conflict of Interest and Code of Ethics Ordinance, Sec. 2-11.1 (g)(1) *Gifts*. The term “gift” shall refer to the transfer of anything of economic value, whether in the form of money, service, loan, travel, entertainment, hospitality, item or promise or in any other form without adequate and lawful consideration. Food and beverages consumed at a single sitting or meal shall be considered a single gift, and the value of the food or beverage provided at the sitting or meal shall be considered the value of the gift.

Investigation:

Rachel Dooley, Office of the City Attorney- Miami
444 SW 2nd Ave Suite 945
Miami, FL 33130

Dooley is an Assistant City Attorney assigned to the Litigation and Appeals Division, of the City Attorney’s office. Dooley voluntarily agreed to be interviewed regarding the allegations herein.

¹ Miami Herald, Local & State Section, 7A.

Dooley indicated that on October 10, 2018, Bratches sent her an e-mail on his and Saeran Ramaya's behalf, thanking her for her support.² He extended an invitation to the Inaugural Formula 1 Miami Festival on Saturday, October 20th, 2018, at Bayfront Park, providing her with full VIP credentials.

Having been the attorney negotiating the contract for months, Dooley stated she did not respond immediately, as she received hundreds of e-mails pertaining to Formula 1. Subsequently, she learned that Bratches had sent the message on October 10, 2019 at 5:27AM and recalled it approximately an hour later (e-mail attached as part of exhibits).³

On October 16, 2018, a second e-mail was sent by Bratches, extending the same invitation, attaching the Formula 1 Festival VIP documentation packet. Three days later, on October 19, 2018, Dooley responded, "I will be diving this weekend, but may try to go by on Sunday." Bratches responded the following day, "Sounds exciting, have fun, hope our paths cross."⁴

Dooley did not attend the event.


During a follow up call to Dooley on May 6, 2019, she indicated that after almost a year-long of negotiations, the Formula 1 Agreement had been called off, although not officially closed out.⁵

Documents/Exhibit Review:

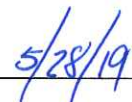
- o Miami Herald Article
- o Emails provided by Dooley
- o City of Miami Agenda/Video/Document review pertaining to Resolution 4509

Conclusion:

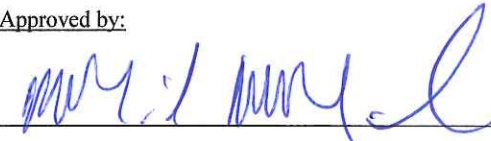
After discussion with the Ethics Advocate it was determined that this matter would be closed with no further action since it appears that Ms. Dooley never accepted any gift that was offered to her therefore she had no obligation to report a gift.



Nilda Olmo, COE Investigator



Date 5/28/19

Approved by:


Michael Murawski, Advocate



José Arrojo, Executive Director

² Saeran Ramaya is Chief Counsel - Race Promotion and Events at Formula 1.

³ The email is attached as part of exhibits.

⁴ The email is attached as part of exhibits.

⁵ The email is attached as part of exhibits.