

## Sanchez, Rodzandra (COE)

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**From:** Turay, Radia (COE)  
**Sent:** Wednesday, June 20, 2018 4:54 PM  
**To:** Sanchez, Rodzandra (COE)  
**Cc:** Diaz-Greco, Gilma M. (COE); Perez, Martha D. (COE)  
**Subject:** FW: INQ 18-154, LaTonda James, MDEAT (j)

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**From:** Turay, Radia (COE)  
**Sent:** Wednesday, June 20, 2018 4:53 PM  
**To:** 'tondaj415' <tondaj415@yahoo.com>; Dixon, John (MDEAT) <John.Dixon@miamidade.gov>  
**Cc:** Centorino, Joseph (COE) <Joseph.Centorino@miamidade.gov>  
**Subject:** INQ 18-154, LaTonda James, MDEAT (j)

Dear Ms. James,

You have inquired regarding whether your prospective employment as a Teen/Student Court Specialist at the Miami-Dade Economic Advocacy Trust would conflict with your becoming a Board member of the 79<sup>th</sup> Street Corridor Community Redevelopment Agency (CRA).

### Background

- You were just hired as a Teen/Student Court Specialist by the Miami-Dade Economic Advocacy Trust (MDEAT).
- Your job responsibilities as a Teen/Student Court Specialist include providing oversight of the day-to-day operation of Miami-Dade County Teen Court and serving as a supervisor for the Teen Court employees who conduct court hearings and training sessions at government facilities across the County.
- You are interested in applying to be a board member of the 79<sup>th</sup> Street Corridor CRA.
- The 79<sup>th</sup> Street Corridor CRA was created by the Miami-Dade Board of County Commissioners by Resolution No 604-11 and Ordinance No. 11-55.
- The members of the CRA are appointed by the Board of County Commissioners via Resolution or Ordinance. You are hoping to be appointed by Commissioner Monestime.
- We have consulted with Assistant County Attorney, Terrence Smith, who advises the CRA, and he indicated that even though the 79<sup>th</sup> Street CRA is not considered a County advisory board, it has adopted the Miami-Dade Conflict of Interest and Code of Ethics.
- The Executive Director of MDEAT, Jon Dixon has advised that MDEAT from time to time does partner with the 79<sup>th</sup> Street Corridor CRA in order to recruit businesses to the 79<sup>h</sup> Street Corridor. MDEAT does not sponsor any resolution before the CRA. It simply assists with recruitment of potential small businesses for the area consistent with the CRA's goals.
- As a Teen Court Specialist, none of your day to day County duties, nor the duties of the staff you supervise, would include work with the 79<sup>th</sup> Street CRA.

### Analysis

Based on these facts, it is our opinion that, **with certain limitations and conditions**, your board service as a member of the 79<sup>th</sup> Street CRA will not conflict with your duties to the County as a Teen/Student Court Specialist

at the Miami-Dade Economic Advocacy Trust. The limitations under the Miami-Dade County Code at Section 2-11.1 include:

- Sec. 2-11.1(j) prohibits County employees from engaging in certain activities that would impair their independence of judgment in the performance of their public duties to the County. (For example, a County employee should avoid dealing in his or her County position with any issue that could foreseeably come before his or her as a member of the CRA and vice versa). See INQ 16-03.
- Sec. 2-11.1 (g) prohibits County employees from exploiting their official position to secure special privileges or exemptions for themselves or others. (For example, as a County employee, you may not attempt to use your County position to secure a position on the CRA board. Further, a CRA board member may be required to attend CRA board meetings during working hours which would require a determination by your County supervisor whether such activity is permissible). See INQ 16-03.
- Sec. 2-11.1(h) prohibits County employees from disclosing confidential information obtained through their official position with the County or use such information, directly or indirectly for personal gain or benefit. See INQ 16-03.
- Sec. 2-11.1 (v) prohibits board members from voting on matters involving entities in which they have any of the following relationships (officer, director, partner, of counsel, consultant, employee, fiduciary, beneficiary, stockholder, bondholder, debtor, or creditor) if they would be directly affected by the vote. See INQ 16-03.

Be aware that other provisions in State law also apply to members of the CRA. For additional information on State law, you may contact the Florida Ethics Commission at [www.ethics.state.fl.us](http://www.ethics.state.fl.us). This opinion is based on the facts presented. If any of these facts change, please contact us.

Sincerely,

**RADIA TURAY**

Staff Attorney  
Miami-Dade Commission on Ethics and Public Trust  
19 W. Flagler Street, Suite 820  
Miami, FL 33130  
Tel: (305) 350-0601  
Fax: (305) 579-0273  
[Ethics.miamidade.gov](http://Ethics.miamidade.gov)

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**From:** tondaj415 [<mailto:tondaj415@yahoo.com>]  
**Sent:** Tuesday, May 22, 2018 5:11 PM  
**To:** Turay, Radia (COE) <[Radia.Turay@miamidade.gov](mailto:Radia.Turay@miamidade.gov)>  
**Subject:** RE: Requesting an opinion

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Here's the job description...

Thanks

Sent from my Sprint Samsung Galaxy S8.

----- Original message -----

From: "Turay, Radia (COE)" <[Radia.Turay@miamidade.gov](mailto:Radia.Turay@miamidade.gov)>

Date: 5/22/18 3:07 PM (GMT-05:00)

To: [tondaj415@yahoo.com](mailto:tondaj415@yahoo.com)

Subject: RE: Requesting an opinion

Hello Ms. James,

My name is Radia Turay. I am a staff attorney at the Miami-Dade Commission on Ethics and Public Trust. I was assigned to assist you with your request. In order to do so, please provide a telephone number at which I can reach you regarding your request.

Thanks,

Radia.

**RADIA TURAY**

Staff Attorney

Miami-Dade Commission on Ethics and Public Trust

19 W. Flagler Street, Suite 820

Miami, FL 33130

Tel: (305) 350-0601

Fax: (305) 579-0273

[Ethics.miamidade.gov](http://Ethics.miamidade.gov)

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**From:** Ethics (COE)  
**Sent:** Monday, May 21, 2018 2:08 PM  
**To:** Turay, Radia (COE) <[Radia.Turay@miamidade.gov](mailto:Radia.Turay@miamidade.gov)>  
**Subject:** FW: Requesting an opinion

Please handle. Thanks.

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**From:** tondaj415 [<mailto:tondaj415@yahoo.com>]  
**Sent:** Monday, May 21, 2018 1:49 PM  
**To:** Ethics (COE) <[ethics@miamidade.gov](mailto:ethics@miamidade.gov)>  
**Subject:** Requesting an opinion

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To Whom it May Concern,

I will begin working with Miami Dade Economic Advocacy Trust on June 18th as The Teen/ Student Court Specialist. I am interested in applying to be a board member of the 79th Street CRA. Please advise if there is a conflict of interest or if I will be able to serve as a board member.

Thank you,

LaTonda James

Sent from my Sprint Samsung Galaxy S8.