

Sanchez, Rodzandra (COE)

From: Diaz-Greco, Gilma M. (COE)
Sent: Thursday, January 25, 2018 10:52 AM
To: Sanchez, Rodzandra (COE)
Subject: Jon Ingraham, Special Projects Administrator, CAHSD (Board service and conflicts of interest) INQ 18-19

INQ 18-19 Ingraham

From: Turay, Radia (COE)
Sent: Wednesday, January 24, 2018 4:33 PM
To: Ingraham, Jon (CAHSD) <Jon.Ingraham@miamidade.gov>
Cc: Centorino, Joseph (COE) <Joseph.Centorino@miamidade.gov>
Subject: INQ 18-19, Jon Ingraham, Special Projects Administrator, CAHSD

Dear Mr. Ingraham,

You have inquired whether a prohibited conflict of interest would exist between your County employment as Special Projects Administrator with the Miami-Dade Community Action and Human Services Department (CAHSD) and your service as a volunteer board member of the Center for Family and Child Enrichment (CFCE). CFCE is seeking to rent space at one of the Neighborhood Service Centers (NSC) administered by CAHSD.

As background, CAHSD administers various NSCs throughout Miami-Dade County to provide needed social services. CAHSD also rents spaces at the NSC's to non-profit and for-profit organizations that provide services to the community.

In addition to your County employment, you serve as an uncompensated, volunteer Board member of CFCE. CFCE is a private, nonprofit, community-based organization that serves: children who have been abused, neglected and/or abandoned; children with severe emotional disturbances and in need of mental health care; and children in the custody of parents or relatives who are chronic runaways and/or are ungovernable. CFCE contracts with the lead agency for community-based care services to nearly 1,000 children, including residential group care, in-home family counseling, and a variety of other services designed to achieve permanency for these children. CFCE is seeking to rent space from Miami-Dade County, CAHSD, at the NSC located at 16345 NW 25th Avenue, Miami Gardens, Florida.

You advise that in your County employment, you work as an Administrator with the Elderly and Disabilities Department, Meals for the Elderly program. You are not involved with the rental of space at the Miami Gardens site that CFCE is seeking to rent, nor do you have any oversight of that location. Further, all final decisions regarding the rental of spaces at the NSCs are made by the CAHSD department Director.

In general, we find no ethics conflicts regarding your County employment and CFCE seeking to rent space at the NSC located at 16345 NW 25th Avenue, Miami Gardens, Florida. However, several sections of the County Code would govern the facts presented:

- The County Ethics Code at Sec. 2-11.1(m)(1) would prohibit you from meeting with any County personnel to affect a decision on behalf of CFCE.

- The County Ethics Code at 2-11.1 (h) prohibits you from disclosing confidential information acquired by reason of your official County position.
- Sec. 2.11.1(g) prohibits you from using your County position to secure special privileges or exemptions for yourself or CFCE.

We also recommend that in order to avoid the appearance of impropriety, you should not be involved in any of the CAHSD decisions regarding leasing space to CFCE. For the same reason, although not directly prohibited by the County Ethics Code, it would be advisable in your role as CFCE Board member, to recuse yourself from voting or participating in CFCE discussions and/or votes relating to the rental of space from CAHSD.

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
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Miami, FL 33130
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From: Ingraham, Jon (CAHSD)
Sent: Tuesday, January 23, 2018 3:25 PM
To: Turay, Radia (COE) <Radia.Turay@miamidade.gov>
Subject: RE: Ethics Opinion

Good afternoon,

The answer to your questions are as follows

1. I am an Administrator with the Elderly and Disabilities Department, Meals for the Elderly program.
2. No I am not
3. Yes they are
4. No I am not

Jon A. Ingraham, Special Projects Administrator
Miami-Dade County
Community Action and Human Services Department
Elderly and Disability Services Division
Soar Park
100 NW 83rd Street
Miami Florida, 33150
Phone (305) 756-2833
Fax (305) 756-4172
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"Delivering Excellence Everyday"

From: Turay, Radia (COE)
Sent: Monday, January 22, 2018 1:02 PM
To: Ingraham, Jon (CAHSD)
Subject: Ethics Opinion

Hello Mr. Ingraham,

My name is Radia Turay. I am a staff attorney at the Miami-Dade Commission on Ethics and Public Trust. I was assigned to handle your request. Please answer the following questions so I may better assist you:

- 1) What are your job duties at CAHSD?
- 2) Do you make an final decisions regarding the rental of spaces for CAHSD
- 3) Are all final decision about the rental of spaces at the NSCs still made by the department Director,
- 4) Are you paid for your service as a Board member for CFCE?

Thanks,
Radia.

From: Ingraham, Jon (CAHSD)
Sent: Friday, January 19, 2018 1:56 PM
To: Ethics (COE) <ethics@miamidade.gov>
Subject: Jon Ingraham

Good afternoon,

This email is requesting an opinion of the following:

I am Jon A. Ingraham employed with the Miami Dade Community Action and Human Services Department, as a Special Projects Administrator. In January 2018, Center for Family and Child Enrichment will be making a request to rent space from Miami-Dade County, (the new Miami Gardens site), to be located at 16345 N.W. 25th Avenue. In May of 2016 I was elected to serve as a Board Member for Center for Family and Child Enrichment.

Please notify me whether or not this presents a conflict. Also note that I am not the manager or neither will I have oversight of the new Miami Gardens site.

Should additional information be needed, please do not hesitate to contact me by email jon.ingraham@miamidade.gov call me at(305)527-5986

Regards,
Jon A. Ingraham

Jon A. Ingraham, Special Projects Administrator
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