

## Sanchez, Rodzandra (COE)

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Wednesday, August 29, 2018 8:54 AM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** INQ 18-211 Miami-Dade County Commission Vice Chairwoman Edmonson (Voting Conflict)  
**Attachments:** 20180823171629033.pdf

INQ 18-211 Bello

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**From:** Centorino, Joseph (COE)  
**Sent:** Tuesday, August 28, 2018 5:22 PM  
**To:** Bello, Gordon (DIST3) <Gordon.Bello@miamidade.gov>  
**Cc:** Simeon, Nimrod (DIST3) <Nimrod.Simeon@miamidade.gov>; Brown, Misty X. (DIST3) <Misty.Brown@miamidade.gov>; Turay, Radia (COE) <Radia.Turay@miamidade.gov>; Perez, Martha D. (COE) <Martha.Perez2@miamidade.gov>; Diaz-Greco, Gilma M. (COE) <Gilma.Diaz-Greco@miamidade.gov>; Sanchez, Gerald (CAO) <Gerald.Sanchez@miamidade.gov>; Kirtley, Eddie (CAO) <Eddie.Kirtley@miamidade.gov>  
**Subject:** INQ 18-211 Miami-Dade County Commission Vice Chairwoman Edmonson (Voting Conflict)

Mr. Bello:

You have submitted a request for opinion from Miami-Dade County Commission Vice-Chairwoman Audrey Edmonson (DIST3) concerning whether she would have a voting conflict of interest under Section 2-11.1(d) of the County Code of Ethics in participating and voting on a proposal submitted to the County by the Community Development Corporation (CDC) of the St. James AME Church for a transit-related County project. You have informed that Vice Chairwoman Edmonson is a member of the St. James AME Church and that she holds the position of Steward of the Steward and Finance Committee of the Church, which makes her, in effect an officer of the church. You have advised that the CDC is a separate 501(c) entity from the Church, and that the Church has no involvement in or stake in the proposal by the CDC, and that the Vice Chairwoman also has no involvement in the CDC and no personal stake or interest in the proposal apart from whatever general interest other community or church members may have in it.

I have consulted with Rev. Jimmy Williams, the pastor of St. James AME Church. He confirmed that the project, a renovation of the Earlington Heights Metrorail Station, is not located in the nearby vicinity of the church and would not have any measurable impact on the church.

The Vice Chairwoman's status as an officer of the Church would, by itself, create a voting conflict of interest only if the church itself would be affected by the project in question. It is my understanding that this is not the case. I also understand that Vice Chairwoman Edmonson has no personal or financial stake in the project that could cause her to personally profit or be enhanced by the Commission action on the proposal.

Under these circumstances, I do not find that Vice Chairwoman Edmonson would have a voting conflict of interest that would prohibit her from voting on or participating in the item when it comes before the Board of County Commissioners. The mere fact that she may be the County Commissioner for the area involved does not itself create any conflict under the ordinance without her having a personal stake or her church being affected by the project.

Sincerely,

Joe Centorino

*Joseph M. Centorino*

Executive Director and General Counsel  
Miami-Dade Commission on Ethics and Public Trust  
19 W. Flagler Street, Suite 820  
Miami, FL 33130  
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**From:** Bello, Gordon (DIST3)  
**Sent:** Thursday, August 23, 2018 5:16 PM  
**To:** Centorino, Joseph (COE) <[Joseph.Centorino@miamidade.gov](mailto:Joseph.Centorino@miamidade.gov)>  
**Cc:** Ethics (COE) <[ethics@miamidade.gov](mailto:ethics@miamidade.gov)>; Sanchez, Rodzandra (COE) <[Rodzandra.Sanchez@miamidade.gov](mailto:Rodzandra.Sanchez@miamidade.gov)>; Ross, Rachelle (COE) <[Rachelle.Ross@miamidade.gov](mailto:Rachelle.Ross@miamidade.gov)>; Simeon, Nimrod (DIST3) <[Nimrod.Simeon@miamidade.gov](mailto:Nimrod.Simeon@miamidade.gov)>; Brown, Misty X. (DIST3) <[Misty.Brown@miamidade.gov](mailto:Misty.Brown@miamidade.gov)>  
**Subject:** Vice Chairwoman Edmonson's Request for Opinion

Dear Mr. Centori:

Please see attached letter from Vice Chairwoman Edmonson requesting an opinion on a County related matter.

Should you have any questions, please do not hesitate to contact me at your earliest convenience.

Gordon Bello, Esq.

*Legislative Aide*

Miami-Dade District 3

**The Honorable Audrey M. Edmonson**

p: 305.636.2331

f: 305.638.6906

a: 5400 N.W. 22nd Ave., Suite 700.

Miami, Florida 33142

w: [www.miamidade.gov/district03](http://www.miamidade.gov/district03) e: [gordon.bello@miamidade.gov](mailto:gordon.bello@miamidade.gov)



Board of County Commissioners

*Audrey M. Edmonson*

Vice Chairwoman

August 23, 2018

Joseph M. Centorino, Esq.  
Executive Director and General Counsel  
Miami-Dade Commission on Ethics and Public Trust  
19 West Flagler Street, Suite 820  
Miami, Florida 33130

Subject: St. James AME Church, Community Development Corporation's ("CDC") Unsolicited Proposal for County Project.

Dear Mr. Centorino,

It has come to my attention that St. James AME Church's, CDC board has issued an unsolicited proposal for a County project. I would like to know your opinion on whether a conflict of interest exists if I vote or participate in any BCC or BCC Committee meeting on the CDC's unsolicited proposal because I am a member of St. James AME Church. Please be advised, the CDC is a separate organization with a separate 501 (c) status. Moreover, I do not sit on the CDC's board and have no involvement or voting rights as a church member pertaining to any matters of the CDC. Additionally, the St. James AME Church falls within my district. In light of the foregoing, could you please provide an opinion on whether a conflict exists?

Thank you in advance for your anticipated assistance.

Sincerely,

A handwritten signature in blue ink that reads "Audrey M. Edmonson".

Audrey M. Edmonson  
Vice Chairwoman  
Miami-Dade Board of County Commissioners