



**ETHICS COMMISSIONERS**

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ARDYTH WALKER  
STAFF GENERAL COUNSEL

December 22, 2008

Jordan W. Leonard  
10300 West Bay Harbor Drive, #1D  
Bay Harbor Islands, FL 33154

Re: INQ 08-194

Dear Commissioner Leonard:

As we discussed today, the Miami-Dade County Ethics Code does not prevent you from serving as a council member in the town of Bay Harbor Islands and, simultaneously, serving on the board of directors of your cooperative building owners' association—a private for-profit corporation within the town of Bay Harbor Islands. Additionally, no ethics conflicts are reasonably foreseeable based on this dual service, particularly since the town has recently created a separate entity to oversee planning and zoning matters.

If an issue were to come before the town council that would benefit your cooperative association or members of the association in a manner distinct from the public generally, you may wish to obtain an ethics opinion clarifying your duties as an elected official.

Sincerely,

VICTORIA FRIGO  
Staff Attorney