

Frigo, Victoria (COE)

From: Frigo, Victoria (COE)
Sent: Wednesday, August 12, 2009 12:58 PM
To: 'Ragoonan, Sharon'
Cc: Thompson, Robert A. (COE)
Subject: INQ 09-134 Sharon Ragoonan, City of North Miami Beach

Ms. Ragoonan,

In an email to our office on August 10, 2009, and in a telephone conversation today, you indicated that some employees of the City of North Miami Beach would like to encourage citizens to shop locally. One suggestion was that the city enter into a partnership with the Chamber of Commerce to help distribute the Chamber's discount flyers *using city resources, such as the city website and city workers.*

As we discussed, government resources must only be used to further official city business. An ad hoc arrangement by city employees to encourage citizens to shop locally is laudable, but it is not official city business unless the governing body of the city has authorized the action. Consequently, the city website cannot be used and city workers cannot be deployed to distribute flyers unless these actions are endorsed by your city council at a public meeting.

Additionally, as regards a possible contract with the Chamber, please be aware that under the City of North Miami Beach's Conflict of Interest Ordinance at § 30, officers and employees of the city are prohibited from having any pecuniary interests, directly or indirectly, in any contracts with the city. Depending on the circumstances, the Chamber of Commerce may be prohibited from entering into a contract with the city if any city employees or officers have financial interests, directly or indirectly, as members of the Chamber.

Thank you for presenting your concerns to our office. If you have further questions, feel free to contact us again or your city attorney.

Sincerely

Victoria Frigo, Staff Attorney
 Miami-Dade Co. Commission on Ethics
 Direct Phone: 305.350.0601
 Fax: 305.579.0273



19 West Flagler St., Suite 820
 Miami, FL 33130

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From: Ragoonan, Sharon [mailto:sharon.ragoonan@citynmb.com]
Sent: Monday, August 10, 2009 5:14 PM
To: Thompson, Robert A. (COE)
Cc: Meyers, Robert (COE); Frigo, Victoria (COE); Katerman, Kathy; Carney, Tom
Subject: RE: Ehtics Inquiry: City of North Miami Beach

8/12/2009

I am grateful for your assistance, and look forward to receiving an opinion.

Respectfully,

Sharon P. Ragoonan, MBA
Assistant Director/Code Compliance Manager
City of **NORTH MIAMI BEACH**, Florida
Phone: (305) 957-3605
Fax: (305) 787-6012
Email: sharon.ragoonan@citynmb.com

From: Thompson, Robert A. (COE) [mailto:ROBTHOM@miamidade.gov]
Sent: Monday, August 10, 2009 2:03 PM
To: Ragoonan, Sharon
Cc: Meyers, Robert (COE); Frigo, Victoria (COE)
Subject: RE: Ehtics Inquiry: City of North Miami Beach

Greetings,

I've forwarded your request to Mr. Meyers and Ms. Frigo. Before you implement this, you may need an inquiry or opinion. Hope this helps.
Robert Thompson

From: Ragoonan, Sharon [mailto:sharon.ragoonan@citynmb.com]
Sent: Monday, August 10, 2009 1:48 PM
To: Thompson, Robert A. (COE)
Subject: Ehtics Inquiry: City of North Miami Beach

Good afternoon Mr. Thompson,

I was one of the attendees in your Ethics presentation here in City Hall, and was hoping to obtain your feedback on an idea we are thinking about implementing.

The City would like to enter into a partnership with the Chamber of Commerce to extend the member-to-member discounts to our residents. It would encourage the residents to shop locally.

The "discount flyer" would be posted on the City's website, and field employees would also hand them out when interacting with a customer.

Are there any Ethics concerns in us providing this benefit to our residents?

Your feedback is greatly appreciated.

Respectfully,

Sharon P. Ragoonan, MBA
Assistant Director/Code Compliance Manager
City of **NORTH MIAMI BEACH**, Florida
Phone: (305) 957-3605

8/12/2009

Fax: (305) 787-6012

Email: sharon.ragoonan@citynmb.com

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