



Via First Class Mail
and
email at ewright@wrightwaymedia.com

May 5, 2010

ETHICS COMMISSIONERS

Kerry E. Rosenthal, CHAIRPERSON
Dawn E. Addy, VICE CHAIRPERSON
Magda Abdo-Gomez
Judge Seymour Gelber
Erica Wright

ROBERT A. MEYERS
EXECUTIVE DIRECTOR

MICHAEL P. MURAWSKI
ADVOCATE

ARDYTH WALKER
STAFF GENERAL COUNSEL

Edgar V. Wright
WRIGHTWAY MEDIA SERVICES LLC
1780 NE 172 St.
North Miami Beach, FL 33162

Re: INQ 10-85 Registering as a County Vendor

Dear Mr. Wright:

In correspondence to our office on May 5, 2010, you said that you wish to register your company as a County vendor.

The facts as we understand them are as follows:

- You serve as a volunteer board member on the Miami-Dade County Black Affairs Advisory Board.
- You wish to register your privately owned advertising and marketing consulting firm, WRIGHTWAY MEDIA SERVICES LLC, as a County vendor.

It is the opinion of the Ethics Commission staff that you may register to contract with the County as long as any contract does not interfere with the full and faithful discharge of your duties to the County. In particular, you are **“prohibited from contracting with any agency or department of Miami-Dade County subject to the regulation, oversight, management, policy-setting or quasi-judicial authority of the board of which [you are] a member.”** See Miami-Dade County Code at Sec. 2-11.1 (c)(3).

This means that as long as you are a board member of the Miami-Dade County Black Affairs Advisory Board, you and/or WRIGHTWAY MEDIA SERVICES LLC may not contract with the Black Affairs Advisory Board or with any County departments or agencies guided by decisions made by the Black Affairs Advisory Board.

Additionally, note that you may not vote on any matters that come before the Black Affairs Advisory Board if you will be directly affected by the action of the Board and you have any of the following relationships with any of the persons or entities appearing before the Board: (i) officer, director, partner, of counsel, consultant, employee, fiduciary, or beneficiary; or (ii) stockholder, bondholder, debtor, or creditor. See Miami-Dade County Code at Sec. 2-11.1 (v).

If any of the facts you have presented change, or if you have further questions, please contact me at 305 350-0601.

Sincerely,

VICTORIA FRIGO
Staff Attorney

copy: Esmeralda Cardenas at ECARDEN@miamidadegov

INQ 10-85

County Employees Wishing to Register as County Vendors

Please submit the following information by mail, fax, or email to—

Victoria Frigo, Staff Attorney
The Commission on Ethics & Public Trust
19 West Flagler St., Suite 820
Miami, FL 33130

Phone: (305) 350-0601
Fax: (305) 579-0273
Email: frigov@miamidade.gov

Employee's Name	EDGAR V. WRIGHT
Employee's Dept.	BLACK AFFAIRS ADVISORY BOARD
Employee's Title	BOARD MEMBER
Business Name	WRIGHTWAY MEDIA SERVICES
Type of Business	ADVERTISING & MARKETING CONSULTANT SERVICES
Employee's Mailing Address	1780 NE 172 ST , NORTH MIAMI BEACH, FL 33162
Employee's Daytime Phone	305-321-0767
Employee's Preferred Email	EWRIGHT@WRIGHTWAYMEDIA.COM
Immediate Family Members	(Please list the names, titles, and departments of any immediate family members currently employed by Miami-Dade Co.)

The Miami-Dade County Conflict of Interest & Code of Ethics at § 2-11.1 (c)(2) allows County employees to contract with the County in certain circumstances and if the following criteria are met. Please confirm that you will meet all of these criteria:

1. Entering into a contract with the County will not interfere with the full and faithful discharge of my duties to the County.
2. I will not participate in determining the contract requirements.
3. I will not participate in awarding the contract.
4. My job responsibilities and job description will not require me to be involved in the contract in any way including, but not limited to, its enforcement, oversight, administration, amendment, extension, termination, or forbearance.
5. I will not be working in the County department that enforces, oversees, or administers the contract.

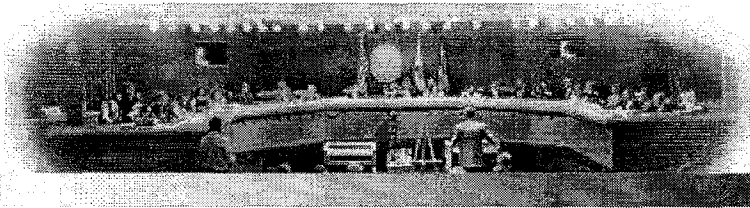
I have read these requirements and pledge to abide by them.

Edgar V. Wright
Signature

5-5-2010
Date

Your ethics opinion will be sent to you by first class mail and email, unless you request another type of delivery.
COE 02/2010

County Boards and Appointment System



MIAMI-DADE

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Membership Maintenance

Membership 13 of 13
◀ [Previous](#) [Next](#) ▶

Board Name

BLACK AFFAIRS ADVISORY BOARD

Member (Member not found? [Enter New Member](#))

Appointment Date

Status

5/21/2007

ACTIVE

WRIGHT, EDGAR View

Term Expiration Date

Term Type

11/30/2008

APPOINTMENT

Appointed/Nominated By:

COMMISSION DISTRICT 1

BARBARA J. JORDAN

Category

Membership Type

REGULAR

Inactive Date

Inactive Reason

Removal Type

Waiver

Multi-Member

Certificate

N

N

Loyalty Oath

30-Day Rule

N

N

Notes

30-Day Rule Information

Seat Assigned to:

Term Expiration Date

[Top](#)

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Florida Department of State
Division of Corporations
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To: Division of Corporations
Fax Number : (850) 617-6383

From: Account Name : CSH SERVICES, LLC
Account Number : I20070000160
Phone : (800) 494-3124
Fax Number : (561) 455-9835

FILED
10 MAR 31 AM 8:09
SECRETARY OF STATE
TALLAHASSEE, FLORIDA

Enter the email address for this business entity to be used for future annual report mailings. Enter only one email address please.

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Help J. BRYAN

APR -1 2009

EXAMINER

H100000727573

**ARTICLES OF ORGANIZATION FOR A
FLORIDA LIMITED LIABILITY COMPANY**
In compliance with Chapter 608 and/or 621, F.S.

FILED
10 MAR 31 AM 8:09
SECRETARY OF STATE
TALLAHASSEE, FLORIDA

ARTICLE I NAME

The name of the Limited Liability Company is:

WRIGHTWAY MEDIA SERVICES LLC.

ARTICLE II ADDRESS

The mailing address and street address of the principal office of the Limited Liability Company is:

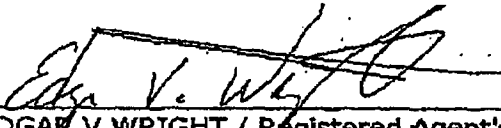
1780 NE 172 STREET
NORTH MIAMI BEACH, FLORIDA 33162

**ARTICLE III REGISTERED AGENT, REGISTERED OFFICE &
REGISTERED AGENT SIGNATURE**

The name and the Florida street address of the registered agent are:

EDGAR V WRIGHT
1780 NE 172 STREET
NORTH MIAMI BEACH, FLORIDA 33162

Having been named as registered agent to accept service of process for the above stated limited liability company at the place designated in this certificate, I hereby accept the appointment as registered agent and agree to act in this capacity. I further agree to comply with the provisions of all statutes relating to the proper and complete performance of my duties, and I am familiar with and accept the obligations of my position as registered agent as provided for in Chapter 608, F.S.

x 

EDGAR V WRIGHT / Registered Agent's signature

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WRIGHTWAY MEDIA SERVICES LLC

ARTICLE IV MANAGEMENT

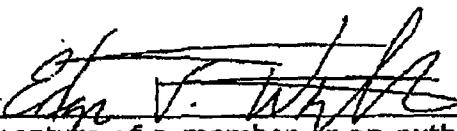
The Limited Liability Company is to be managed by one or more members and is, therefore, a Member Managed Company.

ARTICLE V MEMBERS (optional)

MANAGING MEMBER
EDGAR V WRIGHT
1780 NE 172 STREET
NORTH MIAMI BEACH, FLORIDA 33162

10 MAR 31 AM 8:09
SECRETARY OF STATE
TALLAHASSEE, FLORIDA

FILED

X 

Signature of a member or an authorized representative of a member (In accordance with section 608.408(3), Florida Statutes, the execution of this document constitutes an affirmation under the penalties of perjury that the facts stated herein are true.

EDGAR V WRIGHT