

Frigo, Victoria (COE)

From: Frigo, Victoria (COE)
Sent: Friday, October 07, 2011 3:10 PM
To: 'courtney@thecunninghamgroup.com'
Cc: Thompson, Robert A. (COE)
Subject: CSBE ethics code requirements (INQ 11-150)

Mr. Cunningham,

You asked if you were bound by the Miami-Dade Ethics Code, based on your recent appointment to the Community Small Business Enterprise (CSBE) Board.

As we discussed, many sections of the Miami-Dade County Ethics Code at Sec. 2-11.1 apply to you. *However, Secs. 2-11.1 (c) and (d) are specifically waived for CSBE board members.* This means that you may conduct business as a small business owner with the County *even if* your business is subject to the regulation, oversight, management, policy-setting or quasi-judicial authority of the CSBD.

Please contact your board secretary or Robert Thompson at our office (whose email is in the copy line above) to schedule ethics training, which is required of all board members.

Below is Sec. 10-33.02 (3) B 8 of the County Code that establishes the CSBE Board and provides for the waiver of Secs. 2-11.1 (c) and (d).

...The advisory board is created for the purpose of providing general program oversight and assisting the Department of Business Development in tracking and monitoring the results and effectiveness of the CSBE Program. The advisory board shall not assume the Department of Business Development's administrative or other responsibilities. The advisory board may serve as liaison between program participants and the local business community, recommend additional program incentives, participate in the recruitment of prospective participant's for the CSBE program, and review and report on the program's progress. Within one (1) year after inception of the CSBE program, the advisory board shall recommend to the County Commission the maximum length of time a CSBE may participate in the program.

Sections 2-11.1 (c) and (d) of the Conflict of Interest and Code of Ethics Ordinance of Miami-Dade County are waived for Advisory Board members for transactions arising from the exercise of those powers given the advisory board by this section.

Please feel free to contact me if I can be of further assistance.

Sincerely,

VICTORIA FRIGO, STAFF ATTORNEY

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