



Via First Class Mail
and
email at esighodaro2@comcast.net

ETHICS COMMISSIONERS

February 6, 2012

Dawn Addy, CHAIR
Charlton Copeland, VICE CHAIR
Nelson Bellido
Judge Seymour Gelber
Kerry E. Rosenthal

Erhabor Ighodaro
Oracle Consulting Group, LLC
444 Brickel Ave., Suite 309
Miami, FL 33131

ROBERT A. MEYERS
EXECUTIVE DIRECTOR

Re: INQ 12-27, Mom & Pop Grant

MICHAEL P. MURAWSKI
ADVOCATE

Dear Dr. Ighodaro:

ARDYTH WALKER
STAFF GENERAL COUNSEL

You asked if the County Ethics Code would prevent you from accepting a Mom & Pop Grant provided through Commissioner Barbara Jordan's District 1 Office in light of your board service on the International Trade Advisory Board.

The County Code at Sec. 2-11.1 (m)(2) prohibits a County board member from making a presentation or seeking any benefits for himself or others from the board on which he serves. Sec. 2-11.1 (c)(3) prohibits a County board member from entering into a contract with the County if the board on which he serves would oversee the contract. Sec. 2-11.1 (v) prohibits a County board member from voting on a matter if he would be directly affected by the vote and he has an enumerated relationship with the entity before the board.

Since the International Trade Advisory Board would not be involved in any aspect of the Mom & Pop Grant, you have no ethics conflicts under the County Ethics Code based on the facts you presented.

This opinion construes the Miami-Dade Conflict of Interest and Code of Ethics Ordinance only and is not applicable to any conflict under state law. Inquiries regarding possible conflicts under state law should be directed to the State of Florida Commission on Ethics.

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

Sincerely,

VICTORIA FRIGO
Staff Attorney

Copy: Leroy Jones, Executive Director
Neighbors & Neighbors Association, Inc.
180 NW 62nd St.
Miami, FL 33150