

Frigo, Victoria (COE)

From: Centorino, Joseph (COE)
Sent: Thursday, August 15, 2013 4:24 PM
To: Palacio, Vanessa (Office of the Chair)
Cc: Castro, Vivian (Office of the Chair); Frigo, Victoria (COE); Sanchez, Gerald (CAO)
Subject: INQ - Chairwoman Rebeca Sosa

Ms. Palacio:

You have inquired whether Miami-Dade County Commission Chairwoman Rebeca Sosa has a prohibited conflict of interest in voting on or otherwise participating in RESOLUTION APPROVING AMENDMENT NO. 2 TO INTERLOCAL AGREEMENT BETWEEN THE SCHOOL BOARD OF MIAMI-DADE COUNTY, FLORIDA AND MIAMI-DADE COUNTY, FOR THE PROVISION OF INSPECTOR GENERAL SERVICES THROUGH THE OFFICE OF THE MIAMI-DADE INSPECTOR GENERAL. This resolution would renew the existing agreement between the School Board and County under which the Inspector General provides contract and other oversight services to the School Board under the terms of an interlocal agreement between the two governmental entities.

Chairwoman Sosa has made this inquiry in light of her fulltime employment by the Miami-Dade Public Schools at the Lindsey-Hopkins Technical Education Center. The School Board is a non-commercial governmental entity so Chairwoman Sosa is not automatically prohibited from voting on this matter under Section 2-11.1(d) of the Miami-Dade County Conflict of Interest and Code of Ethics. Further, Chairwoman Sosa's position will not be directly affected by this resolution and she will not profit or be enhanced by the continued contractual association between the two governmental entities. Inasmuch as the Inspector General is an independent agency within the County that provides oversight services to the County in the detection of waste, fraud and abuse of public resources, its involvement at the School Board involves the same function it performs at the County. In neither role does the Inspector General affect Chairwoman Sosa or her office differently from all other persons and departments at the School Board or at the County.

Under these circumstances, there is no prohibited conflict of interest under the County Ethics Code that would prevent Chairwoman Sosa from voting on or otherwise participating in the Resolution in question.

Sincerely,
Joseph M. Centorino
Executive Director and General Counsel
Miami-Dade Commission on Ethics and Public Trust

From: Palacio, Vanessa (Office of the Chair)
Sent: Wednesday, August 14, 2013 9:53 AM
To: Centorino, Joseph (COE)
Cc: Castro, Vivian (Office of the Chair)
Subject: Request for Conflict of Interest Opinion for Interlocal Agreement with School Board (from Chairwoman Rebeca Sosa)

Good morning, Mr. Centorino:

I am writing on Chairwoman Rebeca Sosa's behalf, because she wanted to know whether she has a prohibited conflict of interest regarding the following resolution:

RESOLUTION APPROVING AMENDMENT NO. 2 TO INTERLOCAL AGREEMENT BETWEEN THE SCHOOL BOARD OF MIAMI-DADE COUNTY, FLORIDA AND MIAMI-DADE COUNTY, FOR THE PROVISION OF INSPECTOR GENERAL SERVICES THROUGH THE OFFICE OF THE MIAMI-DADE COUNTY INSPECTOR GENERAL.

I have attached a copy of the resolution for your reference.

Please let me know if you have any questions or need additional information.

As always, thank you for your help in advance.

Regards,

Vanessa Palacio, Esq.

Legislative Aide

Office of Chairwoman Rebeca Sosa

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