

## Frigo, Victoria (COE)

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**From:** Frigo, Victoria (COE)  
**Sent:** Monday, August 19, 2013 11:44 AM  
**To:** 'Pepe, Thomas F.'  
**Cc:** Centorino, Joseph (COE); Diaz-Greco, Gilma M. (COE)  
**Subject:** City Manager Conflict (INQ 13-206)

Mr. Pepe,

The City Manager's previous private business relationship with Sanchez Arrango, which terminated approximately seven years ago, does not prevent the City Manager from recommending that the City enter into a contract with Mr. Arrango.

Sec. 2-11.1 (n) of the County Ethics Code only prohibits city employees from taking official actions involving businesses in which they or their immediate family members currently have financial interests.

Your suggestion that the City Manager reveal his former business relationship with Mr. Arrango is not required under the County Ethics Code but would be worthwhile in order to avoid any appearance of impropriety.

Sincerely,

**VICTORIA FRIGO, SENIOR STAFF ATTORNEY**

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**From:** Pepe, Thomas F. [<mailto:TPepe@southmiamifl.gov>]  
**Sent:** Sunday, August 18, 2013 9:58 AM  
**To:** Frigo, Victoria (COE)  
**Subject:** City Manager Conflict Question

Dear Ms. Frigo:

The City Manager just informed me that in or around 2003-2004, when he had a consulting company, he represented Sanchez Arrango for approximately a year or two. He informed me that he has not had any relationship with the company since that time.

This past week, he learned that one of his departments prepared a resolution for the approval of a contract with Sanchez Arrango. The resolution is scheduled for this Tuesday's commission meeting. For transparency purposes, I will suggest that he disclose the relationship.

Is there any conflict of interest if he following the suggestion of his staff to recommend the award of the contract to this company?

Thank you.

Very truly yours,

*Thomas F. Pepe*

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