
From: Diaz-Greco, Gilma M. (COE)
Sent: Thursday, August 21, 2014 3:38 PM
To: Sanchez, Rodzandra (COE)
Subject: Chris Russo, City Manager, City of Sunny Isles Beach (Conflict of Interest) INQ 14-195

INQ 14-195

From: Centorino, Joseph (COE)
Sent: Wednesday, August 20, 2014 4:12 PM
To: Diaz-Greco, Gilma M. (COE)
Subject: INQ - Chris Russo, City Manager, City of Sunny Isles Beach (Conflict of Interest)

Mr. Chris Russo, City Manager for the City of Sunny Isles Beach inquired concerning his ethical duty in connection with a project he was involved in privately prior to his appointment as City Manager. Mr. Russo was involved with a project known as the Golden Strand Resort, a time-share project at a hotel in Sunny Isles Beach. Mr. Russo performed services connected to a parking lot in the vicinity of the project. He has a financial interest in the project insofar as there is an understanding with his previous partners that he will receive a financial payout if and when the project comes to fruition. Mr. Russo publicly disclosed his previous involvement in the project to City officials prior to his appointment as City Manager.

I advised Mr. Russo that he may receive a financial benefit for work performed prior to his service as City Manager, but in the future he should not be involved in any way as either a public servant or a privately-employed individual in connection with this project, because that could lead to a violation of Section 2-11.1(j) for Conflicting Employment, or possibly Section 2-11.1(g) for Exploitation. Although he indicated that any approvals would be through the zoning board and would not likely involve him in his official position, I advised him that in the event that he might be called upon as City Manager to make any decision or be involved in any discussion concerning the project or any issue that might affect the project in some way, he should delegate his authority in that matter to his Deputy City Manager. Additionally, he should not participate in any further work on the project with his former partners, including strategy discussions regarding the project, due to the nature of his position as City Manager. As City Manager, his authority, both formal and informal, within the City, is of such a nature that any ongoing involvement in a private project in the City would likely be considered prohibited outside employment under Section 2-11.1(j). I also suggested that he memorialize these limitations in writing to his former partner, and that he also make a written delegation of his authority to his Deputy City Manager, in the event that any issue comes before the City regarding this project.

Joseph M. Centorino

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