



## MIAMI-DADE COMMISSION ON ETHICS AND PUBLIC TRUST

Overtown Transit Village North  
701 Northwest 1<sup>st</sup> Court · 8<sup>th</sup> Floor · Miami, Florida 33136  
Phone: (305) 579-2594 · Facsimile: (305) 579-0273  
Website: [ethics.miamidade.gov](http://ethics.miamidade.gov)

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### MEMORANDUM

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**TO:** Princess Brown  
Selection Committee Coordinator  
Miami-Dade County Strategic Procurement Department

Yaritza Reina  
Executive Secretary  
Office of the Commission Auditor

**FROM:** Etta Akoni, Staff Attorney  
Miami-Dade Commission on Ethics and Public Trust

**SUBJECT:** INQ 2025-52 [Voting Conflict of Interest § 2-11.1(v); Resolution No. 449-14;  
Appearances of Impropriety]

**DATE:** May 30, 2025

**CC:** All COE Legal Staff; Namita Uppal, SPD; Adeyinka Majekodunmi, OCA; Jannesha Johnson, OCA; and Pearl Bethel, SPD

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Thank you for contacting the Miami-Dade Commission on Ethics and Public Trust and requesting our guidance regarding the following proposed action.

**FACTS:**

We have reviewed the Office of the Commission Auditor memorandum May 13, 2025, which was prepared in connection with the Appointment of Selection Committee members for Miami-Dade County People and Internal Operations Department Request for Proposals for Self-Funded Employee Group Healthcare Program – RFP No. EVN00042882. The memorandum was prepared in connection with Resolution No. R-449-14, directing the Office of the Commission Auditor (OCA) to conduct background checks on members serving on evaluation/selection committees.

The Office of the Commission Auditor memorandum noted that ten (10) selection committee members made disclosures on their Neutrality Affidavits that merited submission to the Commission on Ethics for an opinion. Specifically, the memorandum notes that:

A. *Se'Adoreia K. Brown, AFSCME Local 199, is not employed by Miami-Dade County. AFSCME Local 199 is not a respondent to this solicitation.*

A review of Se'Adoreia K. Brown's Neutrality Affidavit and resume showed that she has been the President of AFSCME Local 199 since July 2010. We conferred with Se'Adoreia K. Brown, and she advised that she has never worked for Avmed, Inc., Aetna Life Insurance Company, Quality Physical Therapy, LLC., nor any of the subcontracts of either of those companies (hereinafter referred to as "Respondents to EVN0004282"); she does not have any personal financial interests in the Respondents to EVN0004282, she does not conduct any personal business with the Respondents to EVN0004282, nor will she receive a direct financial benefit as a result of this solicitation. Ms. Brown further stated that she has no personal, close social, or other relationship with any current employee(s) of the Respondents to EVN0004282. And lastly, neither she nor any member of her immediate family has any of the following relationships with the Respondents to EVN0004282: (i) officer, director, partner, of counsel, consultant, employee, fiduciary or beneficiary or (ii) stockholder, bondholder, debtor, or creditor. Ms. Brown indicated that she can be fair and impartial when evaluating all respondents to this solicitation.

B. *Barbara Crowe, Jim Perry, Michelle Nathan, Melisa Weise, Ed Scott, and Janet Denbleyker are employed by Gallagher and are not employees of Miami-Dade County. Gallagher is not a respondent to this solicitation.*

A review of Ms. Barbara Crowe's Neutrality Affidavit and resume revealed that she is a Senior Area Vice President and lead consultant for Gallagher Benefit Services, Inc. and has been with the Gallagher family of companies since January 2000. We conferred with Barbara Crowe, and she advised that she has never worked for the Respondents to EVN0004282, she does not have any personal financial interests in the Respondents to EVN0004282, she does not conduct any personal business with the Respondents to EVN0004282, nor will she receive a direct financial benefit as a result of this solicitation. Ms. Crowe further stated that she has no personal, close social, or other relationship with any current employee(s) of the Respondents to EVN0004282. And lastly, neither she nor any member of her immediate family has any of the following relationships with the Respondents to EVN0004282: (i) officer, director, partner, of counsel, consultant, employee, fiduciary or beneficiary or (ii) stockholder, bondholder, debtor, or creditor. Ms. Crowe indicated that she can be fair and impartial when evaluating all respondents to this solicitation.

Mr. James Perry's Neutrality Affidavit and resume indicate that he is a Senior Financial & Actuarial Consultant (Financial Benefits Consultant) for Gallagher Benefit Services, Inc. and has been with the Gallagher family of companies since September 2019. We conferred with James Perry, and he advised that he has never worked for the Respondents to EVN0004282, he does not have any personal financial interests in the Respondents to EVN0004282, he does not conduct any personal business with the Respondents to EVN0004282, nor will he receive a direct financial benefit as a result of this solicitation. Mr. Perry further stated that he has no personal, close social, or other relationship with any current employee(s) of the Respondents to EVN0004282. And lastly, neither he nor any member of his immediate family has any of the following relationships with the Respondents to EVN0004282: (i) officer, director, partner, of counsel, consultant, employee, fiduciary or beneficiary or (ii) stockholder, bondholder, debtor, or creditor. Mr. Perry indicated that he can be fair and impartial when evaluating all respondents to this solicitation.

Ms. Michelle Nathan's Neutrality Affidavit and resume show that she is a Senior Client Executive for Gallagher Benefit Services, Inc. We conferred with Michelle Nathan, and she advised that she has never worked for the Respondents to EVN0004282, she does not have any personal financial interests in the Respondents to EVN0004282, she does not conduct any personal business with the Respondents to EVN0004282, nor will she receive a direct financial benefit as a result of this solicitation. Ms. Nathan further stated that she has no personal, close social, or other relationship with any current employee(s) of the Respondents to EVN0004282. And lastly, neither she nor any member of her immediate family has any of the following relationships with the Respondents to EVN0004282: (i) officer, director, partner, of counsel, consultant, employee, fiduciary or beneficiary or (ii) stockholder, bondholder, debtor, or creditor. Ms. Nathan indicated that she can be fair and impartial when evaluating all respondents to this solicitation.

A review of Ms. Melisa Weise's Neutrality Affidavit and resume revealed that she is an Area Vice President, Pharmacy Benefit Management Consultant for Gallagher Benefit Services, Inc. and has been with the Gallagher family of companies since 2021. We conferred with Melisa Weise, and she advised that she has never worked for the Respondents to EVN0004282, she does not have any personal financial interests in the Respondents to EVN0004282, she does not conduct any personal business with the Respondents to EVN0004282, nor will she receive a direct financial benefit as a result of this solicitation. Ms. Weise further stated that she has no personal, close social, or other relationship with any current employee(s) of the Respondents to EVN0004282. And lastly, neither she nor any member of her immediate family has any of the following relationships with the Respondents to EVN0004282: (i) officer, director, partner, of counsel, consultant, employee, fiduciary or beneficiary or (ii) stockholder, bondholder, debtor, or creditor. Ms. Weise indicated that she can be fair and impartial when evaluating all respondents to this solicitation.

Mr. Edward Scott's Neutrality Affidavit indicates that he is a Director of Financial and Actuarial Consulting for Gallagher Benefit Services, Inc. We conferred with Edward Scott, and he advised that he has never worked for the Respondents to EVN0004282, he does not have any personal financial interests in the Respondents to EVN0004282, he does not conduct any personal business with the Respondents to EVN0004282, nor will he receive a direct financial benefit as a result of this solicitation. Mr. Scott further stated that he has no personal, close social, or other relationship with any current employee(s) of the Respondents to EVN0004282. And lastly, neither he nor any member of his immediate family has any of the following relationships with the Respondents to EVN0004282: (i) officer, director, partner, of counsel, consultant, employee, fiduciary or beneficiary or (ii) stockholder, bondholder, debtor, or creditor. Mr. Scott indicated that he can be fair and impartial when evaluating all respondents to this solicitation.

A review of Ms. Janet DenBleyker's Neutrality Affidavit and resume revealed that she is a Director for Gallagher Benefit Services, Inc. and has been with the Gallagher family of companies since 2000. We conferred with Janet DenBleyker, and she advised that she has never worked for the Respondents to EVN0004282, she does not have any personal financial interests in the Respondents to EVN0004282, she does not conduct any personal business with the Respondents to EVN0004282, nor will she receive a direct financial benefit as a result of this solicitation. Ms. DenBleyker further stated that she has no personal, close social, or other relationship with any current employee(s) of the Respondents to EVN0004282. And lastly, neither she nor any member of her immediate family has any of the following relationships with the Respondents to EVN0004282: (i) officer, director, partner, of counsel, consultant,

employee, fiduciary or beneficiary or (ii) stockholder, bondholder, debtor, or creditor. Ms. Denbleyker indicated that she can be fair and impartial when evaluating all respondents to this solicitation.

C. *Sharon Leach, ACA Actuaries, Inc., is not employed by Miami-Dade County. ACA Actuaries, Inc. is not a respondent to this solicitation.*

A review of Ms. Sharon Leach's Neutrality Affidavit and bio revealed that she is a Client Actuarial Consultant/Subcontractor in the field of employee benefits. We conferred with Sharon Leach, and she advised that she has never worked for the Respondents to EVN0004282, she does not have any personal financial interests in the Respondents to EVN0004282, she does not conduct any personal business with the Respondents to EVN0004282, nor will she receive a direct financial benefit as a result of this solicitation. Ms. Leach further stated that she has no personal, close social, or other relationship with any current employee(s) of the Respondents to EVN0004282. And lastly, neither she nor any member of her immediate family has any of the following relationships with the Respondents to EVN0004282: (i) officer, director, partner, of counsel, consultant, employee, fiduciary or beneficiary or (ii) stockholder, bondholder, debtor, or creditor. Ms. Leach indicated that she can be fair and impartial when evaluating all respondents to this solicitation.

D. *Cathy A. Muse, National Association of Counties, EDGE, is not employed by Miami-Dade County. The National Association of Counties, EDGE, is not a respondent to this solicitation.*

A review of Ms. Cathy Muse's Neutrality Affidavit and resume revealed that she is the National Program Director for National Association of Counties. We conferred with Cathy Muse, and she advised that she has never worked for the Respondents to EVN0004282, she does not have any personal financial interests in the Respondents to EVN0004282, she does not conduct any personal business with the Respondents to EVN0004282, nor will she receive a direct financial benefit as a result of this solicitation. Ms. Muse further stated that she has no personal, close social, or other relationship with any current employee(s) of the Respondents to EVN0004282. And lastly, neither she nor any member of her immediate family has any of the following relationships with the Respondents to EVN0004282: (i) officer, director, partner, of counsel, consultant, employee, fiduciary or beneficiary or (ii) stockholder, bondholder, debtor, or creditor. Ms. Muse indicated that she can be fair and impartial when evaluating all respondents to this solicitation.

E. *Barbara Galvez, Clerk of the Court and Comptroller, listed on her Neutrality Affidavit that she is claiming an exemption according to F.S. 119.071.*

A review of Ms. Barbara Galvez's Neutrality Affidavit and resume indicates that she serves as the Chief Administrative Officer and Comptroller of Miami Dade County (hereinafter referred to as "COC") and has been in that role since 2023. Ms. Galvez indicated on the Neutrality Affidavit that she was claiming an exemption pursuant to F. S. 119.071 and subsequently did not provide the information requested in the remainder of the Neutrality Affidavit. We conferred with Ms. Galvez, she confirmed that she has never worked for the Respondents to EVN0004282, she does not have any personal financial interests in the Respondents to EVN0004282, she does not conduct any personal business with the Respondents to EVN0004282, nor will she receive a direct financial benefit as a result of this solicitation. Ms. Galvez further stated that she has no personal, close social, or other relationship with any current employee(s) of the Respondents to EVN0004282. And lastly, neither she nor any member of her immediate family has any of the following relationships with the Respondents to EVN0004282: (i) officer, director, partner, of

counsel, consultant, employee, fiduciary or beneficiary or (ii) stockholder, bondholder, debtor, or creditor. Ms. Galvez indicated that she can be fair and impartial when evaluating all respondents to this solicitation.

### DISCUSSION:

This agency conducts reviews of potential issues under the County Ethics Code, which governs conflicts by members of County advisory and quasi-judicial boards. A person who is not a County employee may serve on a County selection committee and he or she is considered a County official subject to the County Ethics Code. *See* RQO 13-11 (a member of a County selection committee is subject to the County Ethics Code, regardless of whether that person is a County employee or not); *See Also* INQ 21-126, INQ 23-146, INQ 24-173, and INQ 25-28.

Section 2-11.1(v) of the County Ethics Code states that no quasi-judicial personnel or advisory personnel:

shall vote on any matter presented to an advisory board or quasi-judicial board on which the person sits if the board member will be directly affected by the action of the board on which the member serves, and the board member has any of the following relationships with any of the persons or entities appearing before the board: (i) officer, director, partner, of counsel, consultant, employee, fiduciary or beneficiary; or (ii) stockholder, bondholder, debtor or creditor.

Further, due to the sensitivity of the procurement process and the need to sustain public confidence in it, the Ethics Commission also opines concerning whether there may be an appearance of impropriety in a given situation that would justify the removal of a member of an appointed selection committee. *See* Miami-Dade County Code § 2-1067; Ethics Commission Rule of Procedure § 2.1(b). “In all procurement matters, appearances of integrity and fairness are paramount, [as there is a] ‘need for the County to conduct its procurement operations in a manner that will not create appearances of impropriety, favoritism or undue influence . . . [which] may require a higher standard of ethics . . .’” INQ 17-131 (quoting INQ 14-242).

Based on the information provided and pursuant to Section 2-11.1(v) of the County Ethics Code, it does not appear that either Se’Adoreia K. Brown, Barbara Crowe, Jim Perry, Michelle Nathan, Melisa Weise, Ed Scott, Janet Denbleyker, Sharon Leach, Cathy Muse, or Barbara Galvez will be directly affected by the vote, and they do not currently have any of the enumerated relationships with any entity affected by the vote. *See* INQ 23-01.

Additionally, Se’Adoreia K. Brown, Barbara Crowe, Jim Perry, Michelle Nathan, Melisa Weise, Ed Scott, Janet Denbleyker, Sharon Leach, Cathy Muse, and Barbara Galvez Nathaniel have all indicated no relationship with any respondent to this solicitation. Therefore, given that they have each stated that they could be fair and impartial when evaluating the various respondents to this project, there are no facts to demonstrate a potential conflict or appearance of impropriety. *See* INQ 23-62, INQ 20-136, INQ 18-230, INQ 18-47, INQ 18-21, INQ 17-286, INQ 16-165, and INQ 14-279.

### OPINION

Se’Adoreia K. Brown, Barbara Crowe, Jim Perry, Michelle Nathan, Melisa Weise, Ed Scott, Janet Denbleyker, Sharon Leach, Cathy Muse, and Barbara Galvez do not have any conflicts of interest under

the County Ethics Code that would prevent them from serving as members on this selection committee because they will not be directly affected by the vote, they do not have any enumerated relationship with an entity affected by the vote, and their service on the Selection Committee would not otherwise give rise to an appearance of impropriety. *See* INQ 22-20; INQ 22-19; INQ 18-16.

This opinion is limited to the facts as presented to the Commission on Ethics and is limited to an interpretation of the County Ethics Code only and is not intended to interpret state laws. Questions regarding state ethics laws should be addressed to the Florida Commission on Ethics, P.O. Drawer 15709, Tallahassee, FL 32317, phone number (850) 488-7864, <http://www.ethics.state.fl.us/>.

We appreciate your consulting with the Commission in order to avoid possible prohibited conflicts of interest. If the facts associated with your inquiry change, please contact us for additional guidance.

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*INQs are informal ethics opinions provided by the legal staff after being reviewed and approved by the Executive Director. INQs deal with opinions previously addressed in public session by the Commission on Ethics or within the plain meaning of the County Ethics Code. RQOs are opinions provided by the Miami-Dade Commission on Ethics and Public Trust when the subject matter is of great public importance or where there is insufficient precedent. While these are informal opinions, covered parties that act contrary to the opinion may be referred to the Advocate for preliminary review or investigation and may be subject to a formal Complaint filed with the Commission on Ethics and Public Trust.*