

State Attorney's Office-Miami Dade Florida  
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April 29, 2024

**RE: Violation of City Charter  
City of North Miami, Florida**

Council Members:  
Kassandra Tlmothe  
Mary Estime-Irvin  
Pierre Charles

Dear State Attorney's Office:

This letter shall serve as a complaint with your office regarding the **violation of the North Miami Charter** by three of the council people who represent the City of North Miami.

Section 19 of the North Miami City Charter states that:

**Sect. 19.- Council not to interfere in appointments or removals.**

*Neither the council nor any of its members shall direct or request the appointment of any person to, or his removal from, office by the city manager or any of his (sic) subordinates, or in any manner take place in the appointment or removal of officers and employees in the administrative service to the city. Except for the purpose of inquiry, the council and its members shall deal with the administrative services solely through the city manager and neither council nor any member thereof shall give orders to any subordinates of the city manager, either publicly or privately. Any councilmember violating the provisions of this section, or voting on a resolution or ordinance in violation of this section, shall be guilty of a misdemeanor and upon conviction thereof shall cease to be a councilmember.*

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We believe that the City's charter was violated when the above-named council knowingly interfered with the hiring and firing of City staff member Wisler Pierre-Louis, the department head of North Miami Public Works.

The North Miami City Manager, Rasha Cameau, sent Mr. Pierre-Louis an email on April 5, 2024 requesting a meeting with him be scheduled to discuss some problems she had with some of his recent work product. Specifically, there were funds that Ms. Cameau expected were accessible for a drainage issue on Northeast 3rd Court in North Miami. It was unexpected that the funds were actually not available despite Mr. Pierre-Louis' consistent assurances that they were. Upon realizing the budget for this project was not secure, Ms. Cameau emailed Mr. Pierre Louis to

request a meeting. Within 45 minutes of sending that email to Mr. Pierre- Louis, Councilwoman Mary Estime-Irvin intervened by calling Ms. Cameau demanding to know if her intention was to terminate Mr. Pierre-Louis. While Ms. Cameau was speaking to Councilwoman Estime-Irvin, the department head of public works, spoke with Councilman Pierre Charles and then rendered his resignation letter to the City Manager. **(Enclosed is a copy of the meeting request Ms. Cameau sent to Wisler Pierre-Louis, a copy of the text message Wisler Pierre sent to Councilman Pierre Charles on the city phone moments after receiving the meeting request, as well as the emails regarding the NE 3rd Court funding that were referenced above as the reason for Mr. Pierre-Louis employment concerns).**

Days prior to the incident that took place above, former City Manager of North Miami, **Larry Spring**, was contacted by Councilwoman Kassandra Timothe. Ms. Timothe asked him to use his influence with the current city manager, Ms. Rasha Cameau, to convince her not to terminate the position of Wisler Pierre-Louis. Larry Spring contacted the manager to do so. It has been indicated that Mr. Spring would be able to speak to this conversation with the SAO if they inquire.

Additionally, Councilwoman Mary Estime Irvin contacted a man who has long standing relationships with the City of North Miami, **Ringo Cayard**. She asked Mr. Cayard to go to the City Manager, Rasha Cameau's home, and try to influence her decision to terminate public works department head, Wisler Pierre-Louis. Mr. Cayard did go to the home of Rasha Cameau to discuss the status of the Public Works Director. Mr. Cayard has also stated that, if asked by the State Attorney's Office, he would recount the validity of this situation.

**We allege that the 3 mentioned council members violated the charter when they:**

1. Contacted the City Manager to opine on the possible termination of Wisler Pierre.
2. Spoke directly to Wisler Pierre-Louis outside of the context of the City Manager.
3. Recruited outside parties to influence the hiring or firing of City staff to Ms. Cameau.
4. Threatened Ms. Cameau's management position if she terminated Wisler Pierre.

It is notable that at the following City of North Miami Council meeting, on **April 9, 2024, Ms. Timothe made a last minute motion to terminate City Manager Rasha Cameau's employment contract which was passed by a 3-2 vote carried by Kassandra Timothe, Mary Estime-Irvin and Pierre Charles.**

Enclosed are two emails recounting the funds that Wisler Pierre-Louis misrepresented availability for. Also included is Wisler Pierre-Louis' resignation letter. A copy of the Municode of North Miami is also enclosed. We ask that the State Attorney's Office investigate this matter and enforce the charter provisions that North Miami holds as it relates to the influence of City Council members over public employees.

Sincerely,  
Eileen Bicaba, Complainant  
Stefano Campini, Complainant  
Laura Hill, Complainant

Enclosed:

- Section 19 of North Miami City Charter
- Manager Meeting Calendar invite
- Phone records showing the call made between Wisler Pierre-Louis and Pierre F. Charles, Councilman for District 4
- A text which took place on a city phone between Wisler Pierre-Louis and Pierre F. Charles, Councilman for District 4.
- Wisler Pierre-Louis' resignation letter dated April 5, 2024
- Two emails detailing funding problems with the NE 3rd Court Storm Drainage project