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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Tuesday, March 24, 2015 10:00 AM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** Theresa Sarano, Human Resources Manager, Career Services of South Florida (Nepotism) INQ 15-46

INQ 15-46 Sarano

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**From:** Centorino, Joseph (COE)  
**Sent:** Friday, March 20, 2015 11:51 AM  
**To:** Diaz-Greco, Gilma M. (COE)  
**Subject:** INQ - Theresa Sarano, Human Resources Manager, Career Services of South Florida (Nepotism)

Ms. Sarano inquired regarding whether the Executive Director of her agency, which is composed of County employees) could hire the wife of an employee (Manager of Adult Programs) for the position of Manager of Youth Programs. The husband, as manager of a separate division within the agency, would not be involved in the hiring or in the supervision or promotion of the wife, if she should be hired.

I informed Ms. Sarano that the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance did not include a Nepotism section, and that the issue would fall under State Law, Section 112.3135, as well as County policy. She was informed of the provisions of Section 112.3135, which would prevent a public official from appointing, employing, promoting, advancing, or advocating for appointment, employment or advancement a close relative, which includes a spouse, which does not appear to apply to the circumstances of the inquiry. However, she was also informed that the County Nepotism Policy, adopted 6/11/2007, strongly encourages department directors "to refrain from placing relatives within another relative's chair of command or placing or maintaining relatives in close proximity in a departmental subunit. A copy of the policy was provided to Ms. Sarano.

### *Joseph M. Centorino*

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