

**INQ Summary  
2-11.1 (j) & (k)  
2011-2015**

<b>INQ #</b>	<b>Code Sec.</b>	<b>Requester</b>	<b>Holding</b>
11-02	(j), (k)	John Perez, City of Miami Police Detective	Outside employment as a part-time firefighter in Key West is not prohibited per se, but ultimate authority resides with the employee's supervisor.
11-05	(j), (k)	Judy Shepard, Transit purchasing specialist	A Co. employee must obtain permission from her supervisor to engage in outside employment and file the appropriate, signed forms with the Employee Relations Dept. and Elections.
11-16	(j), (k)	Saens Dorcely, City of Miami, Police Detective	No prohibition in the city code prevents a City employee from holding elected office in Homestead, but he must disclose compensation received for serving on the Council as outside employment.
11-24	(j), (k)	Beverly Hall, GSA	A Co. employee is engaged in outside employment when he sells photos he has taken from a private website, even though the amount of time expended to maintain the website is minimal.
11-25	(j), (k)	Jennifer Roden, WASD	A trainer for WASD may also teach courses for a private entity as long as she is not teaching the same course she teaches for the Co. and she does not use Co. materials in her private employment.
11-27	(j), (k)	Juan Basulto, Airport	A Co. employee who works for his privately owned company must obtain permission from his supervisor to engage in outside employment & file appropriate disclosure forms.
11-34	(j), (k)	Judy S. Shepard, Transit	Co. employee is not prohibited from engaging in outside employee in her cleaning business, but he may not contract with his own department.
11-36	(j), (k)	Gladys Negron-Soto, JSD	No conflict is created if a research manager who does not do training for the Co. Juvenile Justice Dept. accepts outside employment to train in other jurisdictions on juvenile justice issues.
11-42	(j), (k)	Carlos M. Vazquez, Police	Co. employee is not prohibited from engaging in outside employee in his private landscaping business, but he may not contract with his own department.

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11-57	(j)	Beverly Hall, GSA, Sr. HR Manager	A Co. employee may engage in outside employment while on annual leave (as long as permission to engage in outside employment has been approved by his/her supervisor).
11-61	(j)	Carmen Bofill, Elections, Elections, Clerk 3	Nothing in the Ethics Code prevents a Co. employee from earning more from outside employment than from his Co. job, but engaging in outside employment may not impair one's independence of judgment.
11-67	(j)	Duran, Natalie, Fire Rescue Dept., Communications Officer	Although permission to engage in outside employment is ultimately at the discretion of the Department Director, the Ethics Code does not prohibit a Co. employee from being employed as a trainer by a Co. vendor, as long as the Co. employee has no involvement whatsoever with the vendor's contract.
11-93	(j),(k)	Michael Amabile, Captain, Miami-Dade Police Dept.	Serving as a non-compensated, voluntary advisory board member for a local university is not outside employment, and, consequently, no legal requirement exists that would require a Co. employee to obtain permission to engage in outside employment.
11-98	(j),(k),(i) RQO 06-48	Roberto Abrahante, Engineer 3, DERM	A Co. employee who rents only 1 rental unit is not engaged in outside employment. Employees with authority to approve expenditures > \$20,000 are required to file financial disclosure.
11-110	(j),(k) RQO 07-03	Jay Flynn, HR Chief, Transit	Co. employees who engage in outside employment must report to their Co. jobs whenever needed—and not merely for situations that rise to the level of “emergencies.” See also AO 7-1.
11-121	(c),(j),(k) RQO 10-02	Alexander Reines, prospective Security Guard, Parks & Recreation Dept.	A Co. employee must obtain permission to engage in outside employment and, if granted, may not contract with the Co. Dept. that employs him.

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11-122	(j) RQO 05-145	Guillermo Olmedillo, Co. Contractor	A land-use consultant hired by the Co. to prepare the redistricting plan as per the 2010 census does not have an employment conflict accepting work from private citizens regarding zoning matters in the City of Miami.
11-132	(k) C 11-16	Bart Smith, Grant Manager Coordinator, Opa-Locka	A city employee may engage in outside employment with a nonprofit headed by a city councilmember as long as his city supervisor approves his outside employment. The nonprofit organization does not receive any funds whatsoever from the city of Opa-Locka.
11-141	(k) RQO 07-24	Steve Phillips, Lieutenant, Miami Beach Fire Dept.	A city employee who presents a 1-hr. lecture free of charge at a local university is not required to obtain permission to engage in outside employment. Non-compensated voluntary activities are not considered outside employment.
11-143	(k) RQO 06-49	Antonio Fernandez, Contracts Officer, Office of Grants Coordination	A Co. employee may accept outside employment as a bookkeeper with a private company that has contracts with the Co. as long as he does not interact with Co. employees.
11-161	(j), (k) RQOs 09-28; 08-36; 07-24,	Steven VanDesande, Sr., Pilot, Fire Rescue Dept.	A Co. employee is considered to be engaged in outside employment & subject to the requirements in (j) & (k) if he provides a personal service to a non-Co. employer or business associate that is compensated or customarily eligible to be compensated.
11-162	(c),(j),(k) RQO 10-02	Patrick Belus & Rolando Valdes, Firefighters, Fire Rescue Dept., & joint owners of Robelus, Inc.	Co. firefighters must obtain permission to engage in outside employment and, if granted, may not contract through their private company for landscaping or janitorial services with the Fire Rescue Dept. because of their employment with the Fire Dept.
11-168	(c),(j),(k) RQO 10-02	Cristina M. Calderon, Deputy Assistant Director of Safety & Security, Seaport	A Co. employee must obtain permission to engage in outside employment and, if granted, may not contract with the Co. Dept. that employs hers.

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11-179	(j), (k) RQO 08-29 RQO 08-45	Giulio Miglio, Highway Division Designer, Public Works & Waste Management Dept.	Outside employment as a construction “qualifier,” which requires a Co. employee to be at private construction job sites during normal business hours, may violate the Ethics Code, depending on the circumstances.
11-189	(j), (k) RQO 05-95	Leland Salomon, Director, Real Estate Div., ISD ( on behalf of Daniel Borges, Co. Real Estate Officer)	A Co. employee who wishes to engage in outside employment as a security guard has no <i>per se</i> conflict as long as his Dept. Director approves of the employment.
11-193	(j), (k) RQO 05-95	Linda Weber, Real Estate Officer, ISD	A Co. employee who works as a real estate officer cannot engage in outside employment as a private real estate agent if her supervisor does not approve of the outside employment.
12-01	(j), (k) RQO 10-08	Michael Pizzi, Town Attorney, Medley	A municipal attorney may engage in outside employment as a private attorney for the local Chamber of Commerce as long as the Chamber has no business before the town. The attorney is further advised to take the necessary precautions regarding fundraising for the Chamber.
12-04	(j) RQO 05-145	Namita Uppal, Procurement Contracting Manager, Internal Services Department	An employee of United Way, which has received a donation from a County bidder, should not sit on the County selection committee involving that bidder because of the potential for divided loyalties.
12-05	(j) RQO 02-07	Lester Sola, Director, Internal Services Department	An architectural firm that completed work on Phase 1 of the West Lot Multi-Use Facility may bid on Phase 2 of the project because Phase 1 has concluded and the firm would not be reviewing its own work.
12-49	(j) RQO 10-08	Francisco Fernandez, Chief Real Estate Officer, WASD	A supervisor has discretion to prohibit a Chief Real Estate Officer at WASD to activate his real estate license & engage in outside employment as a private realtor.
12-64	(j), (n) RQO 10-08	Nelson Caballero, Outside Contractor, So. Fla. Workforce	A private contractor who provides training for clients of the So. Fla. Workforce may not also provide auditing services to the Workforce because of possible impairment of judgment in the performance of official duties & the prohibition on taking official actions when personal financial interests are involved.

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INQ #	Code Sec.	Requester	Holding
12-88	(j),(k) RQO 08-45 RQO 09-36	David Raymond, Executive Director, Homeless Trust	A County employee within two months of retirement is not engaged in outside employment when he takes preliminary steps to form a corporation for future use as a retirement consulting business. He is not currently providing consulting services.
12-94	(j),(k) RQO 11-15	Anselmo Montero, Administrative Officer 2, County Parks Department	A County Parks employee may engage in outside employment as a roofing contractor without violating the County Ethics Code, as long as he receives approval from his supervisor.
12-101	(j) RQO 09-16	Kyndal Campbell, Assistant to the Director, Vizcaya Museum	The Chief of Security at Vizcaya cannot accept outside employment with a private security company to do security work at the museum because the arrangement would create conflicting loyalties for the employee.
12-109	(j), (k) RQO 10-08	Miriam Singer, Assistant Director, Procurement Management Services (ISD), on behalf of Frank Zuloaga, Construction Manager III (ISD)	Proposed outside employment for a County Construction Manager III creates conflicts if the Manager works for a roofing contractor as a secondary qualifier or as a strategic business consultant, but not if he is employed as an expert witness or a trainer.
12-131	(j) RQO 05-140	Frank Giallorenzo, Assistant HR Director, Coral Gables	City employees are not engaged in outside employment when they serve as officers & directors of corporations but do not provide personal services to the corporations or are not compensated.
12-140	(j), (g), (h), (m), (f) RQO 08-45 RQO 08-29 RQO 05-15 RQO 05-09	Margaret Gachelin, Business Process Specialist, WASD	If granted permission to engage in outside employment with a County vendor, Aflac, a County employee may not use County customer and employee information to benefit her private interests nor may she meet with County staff to lobby on behalf of Aflac or Aflac clients.
12-145	(f), (g), (h), (j), (k), (m) RQO 08-45 RQO 08-29 RQO 05-15 RQO 05-09	Maria de los Abreu, Analyst 3, Office of the Commission Auditor (OCA)	A County employee may accept outside employment from a Head Start program that receives a County grant because neither she nor her office oversees CAHS, the County department that issues grants to Head Start programs.

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12-153	(j), (k) RQO 02-87	Jennifer Walker, Sr. HR Manager, Dept. of Regulatory & Economic Resources	A County employee is not engaged in outside employment when he runs for office and/or serves as a committeeman for the Republican Executive Committee because this position is voluntary and not customarily compensated.
12-155	(j) RQO 99-50	Grisel Agha-Long, Executive Secretary, Aviation Business Retention & Development	A County employee with the Aviation Dept. cannot accept outside employment with an Aviation concessionaire because the County division that employs her manages concessionaire contracts.
12-159	(j) RQO 12-11	Abel Fernandez, Battalion Chief, Fire Rescue	A firefighter cannot accept outside employment with North Shore Medical Center as a healthcare liaison because the private work parallels his duties as a public employee and would, therefore, create conflicting loyalties for the employee.
12-171	(k) RQO 10-08	Jennifer Walker, Sr. Human Resources Manager, Permitting & Inspection Center	County employees hired to work as movie extras must obtain permission from their supervisors to engage in outside employment and file a statement of outside employment income annually.
12-187	(g), (j) RQO 08-29 RQO 08-45	Jose Govea, Plant Electrician, WASD	A WASD electrician should be denied permission to engage in outside employment in his private electrical repair company because of possible conflicts with County time and use of County resources.
12-217	(j) RQO 07-35	Pedro Betancourt, Senior Contract Officer, Aviation	A non-County selection committee member must not serve on the committee when his employer, who has contracts with 4 of the 5 bidders to be evaluated, may benefit from the selection.
12-218	(j), (k) RQO 12-11	Steve Jablonowsky, Manager, Golf Operations, Parks Dept.	A County golf profession may not accept outside employment as a part-time golf instructor at County facilities when he is employed in his part-time capacity by a company that contracts with the County to provide golf lessons.

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12-221	(j) RQO 12-11	Lonny Craven, Director of Airside Operations, MIA	The County Ethics Code prohibits airport employees from engaging in outside employment with entities that the County employees monitor in their County positions.
13-08	(j), (k) RQO 12-11	Jerrod Neal, Labor Management Specialist, ISD	A County employee who has founded a nonprofit organization and serves as its Executive Director, a position traditionally compensated, is engaged in outside employment and must comport with all outside employment requirements.
13-17	(j) RQO 09-16	Patrick Fiore, Councilman, Palmetto Bay	A councilman's employment with Camillus House, where a fellow councilman serves on the Camillus House board, is not likely to impair his independence of judgment in the performance of his public duties because the board has no supervisory authority over employees.
13-28	(j) RQO 12-11	Luisa Millan, Assistant Director, ITD	Although guidelines presented by the Ethics Commission staff may serve as an aid, final determination as to whether a County employee should engage in outside employment is at the discretion of his/her supervisor.
13-34	(j) RQO 08-29	Cecilia Brewer-McDuffie, HR Chief, WASD	A County employee who performs a personal service for a family business, and that service is customarily compensated, is engaged in outside employment even if she is not actually compensated.
13-57	(j), (g), (c)(2), (o) RQO 12-11	Ana Finol, Capital Improvements Manager, Parks Dept.	A County employee should be denied permission to engage in outside employment as a "qualifier" for a private construction company seeking to do business with the County because the employee would be required to conduct outside employment during regular business hours. Additionally, the employment is similar to the work she does for the County and could, therefore, cause conflicts of interest.
13-59	(j) RQO 12-11	Richard Kuper, Outside Bond Counsel, City of Miami	An outside bond counsel who is under the direct supervision of the city attorney has conflicting employment to serve on the city's selection committee to choose a new city attorney because the bond counsel would be voting on a matter that would directly affect his city employment contract.



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13-72	(j) RQO 12-07	Michael Sarasti, Customer Service Advocate, Community Information & Outreach Dept.	A Customer Service Advocate for the Community Information & Outreach Dept. (CIAO), who does not perform any graphic design functions for CIAO, does not have conflicting outside employment if he works part-time as a graphic designer on special projects at JMH.
13-86	(j) RQO 07-35	Lenora Allen-Johnson, Contracts Administrator, Aviation Dept.	A private citizen has a conflict to serve on a County selection committee because he has a current contractual relationship with one of the bidders whom the selection committee will be evaluating.
13-88	(j) RQO 12-11	Lazaro Solis, Deputy Property Appraiser, Property Appraiser's Office	In order to avoid conflicts between duties to the County as the second in charge of the Property Appraiser's Office and duties to a private employer, the Deputy Property Appraiser was advised to decline outside employment as a consultant with a Colombian company developing IT programs to be used in searching property tax rolls.
13-100	(j) RQO 09-16	Rolando Aedo, employee of Greater Miami Convention and Visitors Bureau (GMCVB) and a Aviation selection committee member	A selection committee member does not have a conflict to evaluate bidders to manage a hotel at the airport even though one of the bidders is a member of the GMCVB, a nonprofit organization that employs him. Because membership rolls account for less than 5% of the GMCVB's overall budget and have a de minimis impact on the committee member's salary, his personal and financial interests are not affected by membership numbers in the GMCVB.
13-109	(j) RQO 09-16	Roberto Suarez, County Hearing Officer, Clerk of the Courts, and Member of Community Council #10	A part-time County Hearing Officer does not have conflicting employment to serve as an appointed member of Community Council #10.
13-116	(j) RQO 98-09	Oriol Haage, Trainer, Regulatory & Economic Resources	A Co. trainer (who is not considered an "officer" under state law) may volunteer as a member of the Broward Board of Rules and Appeals because his volunteer activities in Broward Co, are unlikely to impair his independence of judgment in the performance of his public duties on behalf of Miami-Dade Co.



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13-122	(k)(2) RQO 06-48	Joaquin S. Vila, Detective, Miami-Dade Police Department	A Co. employee who owns 5 rental properties must request permission to engage in outside employment on a yearly basis from his/her department director. Once permission is obtained, the employee must file yearly income statements related to outside employment with the Elections Dept.
13-146	(j),(k) RQO 08-45	Maurice Jenkins, Division Director, Information Systems & Telecommunications, Aviation Dept.	A Co. employee who provides private consulting and advisory services to entities outside of the County must obtain written permission from his or her supervisor to engage in outside employment.
13-157	(j) RQO 12-64 RQO 10-08 <i>also directed to</i> AO 7-1	Darren Altarac, Lieutenant, M-D Fire Rescue Dept.	A Co. fire investigator may have conflicting outside employment as a private fire investigator for private insurance companies and law firms because these private entities are likely to appear before the County on matters related to fire investigations.
13-196	(j) RQO 12-11	J.M. Burns, Lt. Fire Investigator, M-D Fire Investigation Bureau	A County fire investigator who transfers out of the Fire Investigations Bureau to work on a rescue or fire truck, and who will no longer conduct fire inspections for the County, will not have conflicting outside employment as a private fire investigator outside of the County.
13-232	(m),(n), (g), (j) RQO 12-07	Joe Geller, City Attorney, Miami Lakes, Opa-locka, and El Portal	To avoid creating conflicting loyalties, a city attorney cannot proffer the services of a bank to municipalities that employ him as a city attorney when the bank is the attorney's private law client.
13-236	(j) RQO 02-87	Michael Chavez, Manager, County Office of Elevator Safety	A County employee is not prohibited from serving as a non-compensated board member for NAESAI, a nonprofit entity that certifies professionals in his field, as long as the County employee recuses himself from any matters on the board related to County employees' certifications.
13-240	(j) RQO 12-11	Steve Jablonowski, Golf Operations Manager, Co. Parks Dept.	The manager of County golf operations does not have conflicting employment when he creates a private golf management company to oversee golf course operations outside of Miami-Dade County, but his outside work should be closely monitored by his supervisor, to prevent any possible conflicts.

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INQ #	Code Sec.	Requester	Holding
13-250	(g), (j), (n) RQO 12-07	Ralph Ventura, City Attorney, City of Sweetwater	A city attorney does not have a prohibited conflict of interest representing a city-authorized towing company in his private law practice when the towing company does not have a contractual relationship with the city, the attorney's representation of the company is limited to matters occurring outside of the city that employs him, and the city attorney plays no role in authorizing the towing company to do business in the city.
13-257	(g), (j) RQO 12-07	Helen Rodriguez, Administrative Secretary, M-D Dept. of Regulatory & Economic Resources	A Co. employee may distribute a flyer describing the participation of her privately owned company in a County-sponsored event to support Breast Cancer Awareness because the Mayor's Office has invited her to participate in the event, which plainly serves an appropriate public purpose.
13-268	(d), (j) RQO 12-07	Enbar Cohen, City Commissioner, City of Aventura	A City Commissioner may accept a paid or unpaid law school internship while serving as an Aventura City Commissioner as long as the arrangement does not induce her to place her personal or financial interests ahead of the public's interests. The Commissioner may not vote on any matters affecting her business and/or professional associates.
13-285	(g),(j),(k) RQO 12-07	Troyano, Jorge, Firefighter, Miami Dade Fire Dept.(MDFR)	A County firefighter does not engage in conflicting outside employment when selling fire equipment outside the County for a County vendor that provides firefighting equipment to MDFR where the firefighter has no contact with or authority over the County contract.

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13-308	(j) RQO 09-16	Vivian O. Walters, Jr. Contract Development Specialist II, Small Business Development Division (SBDD)	A County Contract Development Specialist for SBDD obtained permission from his supervisor to serve as a volunteer board member for the Broward County Consumer Protection Board (BCCPB). The Ethics Commission concurs with the supervisor that the County employee does not have a prohibited conflict of interest serving as a volunteer board member for BCCPB where the board member's role includes reviewing consumer complaints and addressing consumer grievances in Broward County and this role does not affect any area of the employee's County employment.
14-07	(k)(2) RQO 06-48	Michaela Doherty, Proj. Admin., Office of Mgmt. & Budget	A County employee who manages 3 or more rental units must seek permission to engage in outside employment and file the required permission and disclosure forms.
14-13	(k)(2),(j), (w),(e)	Morris Copeland, Director, Miami-Dade County Juvenile Services Department (JSD)	The Director of JSD's participation as a <i>paid consultant</i> in the IACP Law Enforcement Leadership Institute constitutes outside employment. Because attendance is for an educational purpose, it would not constitute prohibited outside employment under the Ethics Code. The director would be required to submit a Request for Employment form to his supervisor and would have to complete the Outside Employment statement by July 1 <sup>st</sup> of each year.
14-14	(k)(2) RQO 06-48	Olga Espinosa-Anderson, Div. Dir., County Public Works & Waste Dept.	A County employee who manages 2 condos does not engage in outside employment. However, County employees that manage 3 or more rental units must seek permission to engage in outside employment and file the required permission and disclosure forms.

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14-21	(j) RQO 06-48	Dolores Daily, Computer Services Manager, County Clerk of Courts	A County employee who manages 5 or more rental units through a trust owned by the County employee and her spouse, must seek permission to engage in outside employment and file the required permission and disclosure forms.
14-23	(j) <i>directed to</i> County AO 7-1	Kevin M. Kirwin Assist. Dir. for Operations, County Parks &, Recreation Dept. (PROS)	Although the Ethics Code prohibition on outside employment does not apply to part time employees, the Ethics Code prohibition on employment that would impair the independence and judgment of an employee's performance of public duties applies to both full and part-time employees.
14-32	(j),(k) RQO 09-16	Elisa Crespo, HR Training Specialist II, Seaport	Proposed outside employment providing CPR and first aid training to private school bus drivers which is required for their driver certification, does not create a conflict for a County Seaport HR Training Specialist II.
14-36	(j) (k) Fla. Stat. 112.313 (7)(a) (2012)	Noel Cubela, Park Mgr. II, City of Miami Parks	A City employee should be denied permission to engage in outside employment as a tennis instructor and program management for a non-profit organization youth tennis organization that runs its programs out of the same park that the employee manages. The employee schedules the program for the non-profit organization, and would be required to conduct some of the outside employment during regular business hours. Additionally, the employment is similar to the work he does for the City and could, therefore, cause conflicts of interest.
14-41	(j),(k)	Jennifer Walker, Sr. HR Mgr., County Aviation Depart.	A county employee, who engages in compensated work during the period of time of an approved leave of absence (LOA), is engaging in outside employment. Consequently, the employee must complete the Outside Employment form and file an Outside Employment Statement by July 1st.

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14-49	(j),(k),(d)	Darrell L. Hunter, DLH Professional Services, INC.	A county employee seeking to contract with the county is required to complete Outside Employment procedure and county vendor application procedure, which include applying for and obtaining compliance letters from the Ethics Commission. The County employee is also seeking a Mom & Pop grant. He is required to apply through the Neighbors and Neighbors Association and request a compliance letter from the Ethics Commission.
14-58	(j) RQO 12-07	Hung Do, Zoo Exhibits Technician, Zoo Miami	A Zoo Miami employee's act of providing to a third party photographs he took in the public areas of the Zoo, is not likely to impair his independence of judgment in the performance of his public duties because the pictures were taken several years ago, are in compliance with the zoo's policies on picture taking in public areas, and were given free of charge.
14-59	(j),(k),(g), (h) RQO 12-07	Julio A. Rey, Graphics Tech Supervisor, Miami- Dade Transit	A full-time County employee is not prohibited from including in the portfolio for his private graphic design work, samples of work he has already produced in his County employment. The employee has obtained permission for outside employment and it is unlikely that using these samples would impair his independence of judgment in the performance of his public duties where the work samples have already been prepared for a public purpose, in the ordinary course of his employment, are part of the public record, and can be readily obtained by anyone in the general public. In order to avoid exploitation of official position, the employee must not use County time or resources to benefit his private outside employment. Further, the employee may not engage in any activity which would require him to disclose confidential information acquired by reason of his official position, nor use such information directly or indirectly for his personal gain or benefit.

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14-65	(v),(j) RQO 06-52	Victoria Mendez, City Attorney, Miami City Attorney	A board member should recuse himself and abstain from voting on a Developer's project coming before the board where the member is employed by the same Developer, even though the member will not work on the project being considered.
14-69	(v),(j) RQO 06-52	Gerald Sanchez, Assistant County Attorney	A Construction Trade Qualifying board member should recuse himself and abstain from voting where he is a contractor who has a contract with a condominium that has filed a complaint before the Construction Trade Qualifying board.
14-71	(k)(1) <i>directed to</i> Fla. Stats. 112.312(12)(b) 3, and 112.3149	Victoria Mendez, City Attorney, Miami City Attorney	The Ethics Code does not specifically address honoraria. However, an honorarium type of payment, i.e., a payment made for a single speech or event (rather than payment for expenses, which is not an honorarium), is not considered a gift because it is not given without consideration. Furthermore, Section (k)(1) of the Ethics Code would prohibit the city manager, department heads or employees from receiving any outside compensation for his or her services as an officer or employee of the city. If a particular event was very closely connected to that person's official duties or job responsibilities, then that person should not accept the honorarium at all.
14-83	(j) RQO 09-16	Stephen Christensen, Environmental Resources Project Supervisor, County Public Works and Waste Management (PWWM)	An Environmental Resources Project Supervisor in PWWM whose work focuses on environmental compliance and inspection of County landfills does not have conflicting employment if he engages in outside employment for a general engineering company in projects outside of the county involving coastal zone management. His work with the engineering company is not likely to impair his independence of judgment in the performance of his public duties because the engineering company does not contract with the employee's department and the employee's work for the engineering company is unrelated to the waste management functions the employee performs in his County position.

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14-84	(j),(g) RQO 07-35	Dawn M. Soper, Real Estate Officer, Miami Dade County, Internal Services Department	A Co. employee, employed by the Property Appraiser's Office, would not have a conflict serving on a selection committee where she works in the same department as the mother of one of the associates of a company on the County's approved appraisers list. The employee's independence of judgment is not likely to be impaired given that she is not supervised by the mother of the associate, and the employee does not have any private or financial interest that would be affected by the choice of the selection committee.
14-90	(j),(k) RQO 06-48	Oriol Torres-Haage, Training and Certification Officer, County Department of Regulatory and Economic Resources	Management of three or more rental properties is considered outside employment unless the employee has a management company to manage the properties and the employee is not permanently involved in their management.
14-99	(j) <i>directed to</i> Fla. Stat. 112.313(7)(a)	Aleem A Ghany Interim City Manager City of North Miami	A City Tennis Pro Manager has conflicting outside employment to operate his private tennis pro shop during his city employment, and to provide private tennis lessons to students who also attend City tennis program which the employee manages and teaches.
14-103	(j) RQO 11-15	Eric Miller, Pollution Control Inspector, County Regulatory and Economic Resources Department	A Co. Pollution Control Inspector does not have conflicting employment to work as a substitute teacher in the Miami-Dade public schools because the school system is separate from the Co., and it is unlikely that this type of work would impair his independence of judgment in the performance of the duties of his Co. position.
14-104	(j) RQO 04-127 <i>directed to</i> Village of Palmetto Bay Code Sec. 2-136	John R. Herin, Shareholder, Gray Robinson, P.A.	A prohibited conflict of interest would not occur if a partner of a former Interim Village Attorney (IVA) for the Village of Palmetto Bay, represents a bank client in securing the reduction and/or elimination of a Village code enforcement lien on a bank-owned piece of property because Section 2-11.1(j) of the Co. Ethics Code does not extend to the former IVA's law firm partner. However, pursuant to the Village's Code 2-136, the former IVA would be prohibited from being involved in the code enforcement lien reduction process.



**INQ Summary**  
**2-11.1 (j) & (k)**  
**2011-2015**

INQ #	Code Sec.	Requester	Holding
14-128	(j), (c)(2), (k)	Anita M. Najiy, Assistant Chief of Police	A Police Dept. employee is not prohibited from engaging in outside employment as a private instructor of preparatory classes for sergeant, lieutenant, & captain positions if the Division she works in is not involved in the process of promoting employees. The employee must file a Outside Employment Statement disclosing income from that employment.
14-136	(c)(3), (j), (l) RQO 04-04 RQO 06-52	John Rodriguez, Board Member, Miami Dade International Trade Consortium (MDITC)	The MDITC is a Co. advisory board whose members are subject to the Co. Ethics Code. A Bank Officer would not be prohibited from serving on the MDITC provided that he does not have a prohibited conflict of interest under the Co. Ethics Code. Section (c) (3) of the Code would prevent him from contracting with any agency or department of Miami-Dade Co. subject to the oversight of the MDITC. Section (j) would prohibit him from engaging in employment, which would impair his independence of judgment in the performance of his public duties. Section (l) would prohibit him from having personal investments in any enterprise, either himself or through a member of his immediate family that would create a substantial conflict between both interests.
14-141	(g), (j), (w) RQO 05-110	Richard E. Pena, Senior Berthing Officer, Seaport Department	A Co. employee is not prohibited from accepting paid travel & other incidental expenses from a company that has a sub-contract with a Port Contractor, which the employee does not oversee or administer, inasmuch as the company is not a contractor, vendor or service provider with the Co. & is also not a bidder or proposer on any pending contract. Nonetheless, payment of these expenses constitutes a reportable gift subject to disclosure requirements. Further, the employee may accept outside employment with the company as a consultant because it would not impair his independence of judgment in the performance of his public duties.

**INQ Summary**  
**2-11.1 (j) & (k)**  
**2011-2015**

INQ #	Code Sec.	Requester	Holding
14-143	(e), (j), (g), (m)	Frantz Devilmé, Property Manager, County Aviation Real Estate Management and Development Dept.	A Co. employee is not prohibited from serving as President of a nonprofit organization because as a non-paid volunteer he is not engaged in “outside employment” and consequently is not subject to the filing requirements. However, the employee must refrain from using his or her position in the Co. in order to obtain special benefits for the nonprofit and is prohibited from appearing before any Co. board or agency to make a presentation or to seek a benefit on behalf of the nonprofit entity.
14-144	(k) RQO 08-36	Shanda Mazzorana, (ITD) on behalf of Serafin Suarez, (ETSD)	A Co. employee engages in outside employment when he provides either paid or unpaid services to any firm or business including, but not limited to, those owned by an immediate family member. The Co. employee would therefore be required to request permission for outside employment from his department on a yearly basis & would have to file an Outside Employment Statement report by July 1st of each year.
14-146	(j),(k)(2), (b)(13) <i>directed to</i> County Ordinance 2-11.	Juliette R. Antoine, Assistant County Attorney, County Attorney's Office	Most of the provisions of the Co. Ethics Code concerning conflicting outside employment, apply to all employees, full-time and part-time; however, the disclosure form requirement in (k)(2), as well as the requirement of approval by the department head in 2-11, are specifically limited to full-time employees. None of these requirements apply to a contract employee unless that employee is employed under a contract that has been designated to comply with specified provisions of the Co. Ethics Code pursuant to (b) (13).
14-148	(c), (j), (k)	David Fung-On Miami Dade County Seaport	A Co. employee who works for an unrelated department may volunteer as a “Ranger” at a Co.-owned golf course facility without it constituting outside employment under the Co. Ethics Code because it is an all-volunteer position & no compensation is provided other than incidental usage of the facilities during times that they are not in use.

**INQ Summary  
2-11.1 (j) & (k)  
2011-2015**

INQ #	Code Sec.	Requester	Holding
14-154	(j) <i>directed to</i> Fla. Stat. 99.012	Esteban Bovo, County Commissioner, Dist. 3	A board member of the City of Hialeah's quasi-judicial planning & zoning board may serve as an appointed commission aide if a commission aide is not considered to be a Co. officer & consequently the board member would not be required to resign her City position pursuant to § 99.012 Fla Stat. In order to avoid any appearance of impropriety, she should avoid dealing in her Co. position with any issue that could foreseeably come before her as a member of the Hialeah Board.
14-160	(k)(2)	Andrew Bowes, Hydrologist, County Regulatory and Economic Resources Dept.	Pursuant to Section (k) (2) of the Co. Ethics Code, the Outside Employment Statement form must be filed by July 1st of each year. The form should only be filed by employees who have outside employment to disclose. Completed forms must be filed with the Co. Elections Dept.
14-163	(c), (j), (k) RQO 00-13 RQO 12-11	Craig Mcqueen, Central District Major, Miami Police Department (MPD)	An MPD employee who does not participate in the Dept.'s promotional process is not prohibited from engaging in outside employment that involves conducting promotional assessment training outside of the department for fellow MPD members, so long as the MPD does not pay for individuals to take the course. Also, the employee is required to request permission by his department head in order to engage in outside employment and must file an Outside Employment Statement disclosing that income by July 1 <sup>st</sup> of each year.

**INQ Summary  
2-11.1 (j) & (k)  
2011-2015**

INQ #	Code Sec.	Requester	Holding
14-168	(g), (h), (j) RQO 12-07	Tiffani Page, Accountant 3, Finance Division, County Public Housing and Community Development (PHCD)	A Co. PHCD employee does not engage in conflicting outside employment with AME Church when the Church is entering into an agreement with Carrfour, a non-profit developer of low income housing, and Carrfour will be applying for a federally funded block grant administered by the PHCD. The Co. employee works in PHDC's Finance division which is not in the division that administers the block grant nor is her work in any way related to the administration or oversight of the block grant funds program. Further, her outside employment with the Church in the position of CFO/Financial Secretary for the church involves book-keeping and other accounting tasks, but she has no involvement in the decision-making with respect to the Church's agreement with Carrfour.
14-170	(d), (j) RQO 06-64	Bianca Caviglia, Legislative Assistant, Commissioner Juan Zapata	A legislative assistant for a Co. Commissioner does not have a prohibited conflict of interest also serving as an Executive Director of a non-profit organization (Guitars Over Guns) that is applying for Co. funding through a Youth Arts Enrichment Program grant administered through the Co. Cultural Affairs department. The voting conflict provision of the Code does not apply to those on the Commissioner's staff & those who do not have a financial interest in a matter. The employee should completely disengage herself from any participation or discussion on this item while it is being considered.
14-174	(g),(j), (c)(1),(2), (d),(m)(1) RQO 00-13	Beatriz Dominguez, Sergeant, Miami-Dade Police Department (MDPD)	A Sergeant at the Miami-Dade Police Department (MDPD) is prohibited from contracting with her own department, but may contract with the County through her privately- owned company, Does Construction Inc., as long as the contract does not interfere with the full and faithful discharge of her duties, she does not participate in determining the contract requirements or in awarding the contract, and she refrains from lobbying the County.

**INQ Summary**  
**2-11.1 (j) & (k)**  
**2011-2015**

INQ #	Code Sec.	Requester	Holding
14-175	(j) RQO 12-11	Amelia Cordova-Jimenez, A&E Consultant Selection Coordinator, Internal Services Department	An architect whose private firm is involved in pending contracts at Miami International Airport (MIA) that are overseen by the Cultural Affairs Department (CUA) is prohibited from serving on a selection committee that is also overseen by the CUA because it is likely that the architect's independence of judgment could be impaired in a situation where he is serving under his public duty in the selection process on one project, while being under the oversight of the same department in a contract he is working on through his private firm in another County department.
14-182	(c), (j) RQO 06-64	Cindy Dominguez, Legal Assistant, Patino & Associates, P.A.	A newly-appointed member of the Public Health Trust (PHT), does not have a prohibited conflict of interest in connection with the representation by his firm of the estate of a client, where JMH possesses a lien against a recovery in the amount of \$378,755.84, because JMH is not a party to the lawsuit and at this point has no adverse position to the PHT member or his client in the lawsuit. However, the JMH lien should not be discussed, considered or compromised in any way in connection with that representation. In the event of a final determination that did not result in the full payment of the lien, the PHT member and his firm could not be engaged in further representation of the estate in connection with that lien, either for purposes of litigation or settlement.

**INQ Summary**  
**2-11.1 (j) & (k)**  
**2011-2015**

INQ #	Code Sec.	Requester	Holding
14-183	(j) RQO 07-35	Amelia Cordova, A&E Consultant Selection Coordinator, County Internal Services Dept.(ISD)	The Dean of the College of Architecture and the Arts at Florida International University (FIU), whose job duties include fundraising, is prohibited from serving as a Competitive Selection Committee member for the Coconut Grove Playhouse, where four of the respondent firms for the project have an annual financial commitment to FIU as members of the Dean's Leadership Advisory Board at the School of Architecture and several are contributors to other projects at the School. A conflict of interest would arise because the Dean would be placed in a position where his independence of judgment could be affected by his position at FIU and his close association with some of the applicants on the project.
14-185	(c), (g), (k), (n), (p) RQO 00-13 RQO 12-07	Alex Munoz, Director, Miami-Dade Animal Services Dept.	Animal Services Dept. (ASD) employees, who have private veterinary practices outside of their County employment, are prohibited from contracting with the Animal Services Dept. absent a waiver by the Board of County Commissioners (BCC). Further, Animal Services employees are prohibited from making referrals to private veterinary practices which provide veterinary services not performed by Animal Services and from making referrals to their own private practices or to private veterinary practices which employ them given that referral would likely impair the County employee's independence of judgment in the performance of his public duties.
14-187	(c), (k) RQO 00-13 RQO 12-07	Kathleen R. Labrada, County Animal Services Dept.	Animal Services Dept. (ASD) employees, who have private veterinary practices outside of his County employment, are prohibited from contracting with the Animal Services Dept. absent a waiver by the Board of County Commissioners (BCC).

**INQ Summary  
2-11.1 (j) & (k)  
2011-2015**

INQ #	Code Sec.	Requester	Holding
14-190	(j) RQO 12-07	Lorena Bravo, Acting City Attorney, City of Hialeah	A City of Hialeah plans examiner employed by Hialeah's Building Dept. is not prohibited from being hired as an employee of Hialeah's Construction Management Dept. as the city's architect of record for the city's public works projects because his work as the city's architect does not interfere with his regular duties as a County employee. The employee should not review and approve the plans he submits to the Building Dept. as the city's architect of record and should not supervise anyone that will be reviewing the plans he submits.
14-195	(j),(g)	Chris Russo, City Manager, City of Sunny Isles Beach	A City Manager of Sunny Isles Beach may receive a financial benefit for work performed for Golden Strand Resort, a time share real estate project, prior to his employment as City Manager and which he disclosed publicly prior to becoming City Manager. However, while employed as City Manager, he should not be involved in any way either as a public servant or a privately-employed individual in connection with this project, because this could lead to a violation of Section 2-11.1(j) (conflicting employment), or Section 2-11.1(g) (exploitation).
14-202	(j)	Richard K. Parrish II, MD, UM Health Bascom Palmer Eye Inst.	No conflict of interest would exist where a Physician seeking a position at PHT/JHS as the Medical Director/Chief Academic Officer overseeing the Graduate Medical Education (GME) residency programs for compliance with the requirements of the Accreditation Council for Graduate Medical Education Programs (ACGME), also serves as a board member advising the Board of Directors of the Center for Haitian Studies (CHS) regarding compliance of the medical functions performed by medical residents with ACGME requirements but resigns his position at CHS.
14-213	(j) RQO 08-29 RQO 05-140	Johnathan Sinkes, City of Miami Beach employee	A Municipal employee, who performs a personal service for his privately, owned business which is customarily compensated, is engaged in outside employment even if the business is not currently generating income.



**INQ Summary**  
**2-11.1 (j) & (k)**  
**2011-2015**

INQ #	Code Sec.	Requester	Holding
14-215	(j) RQO 08-29	Daniel Payne, Chief of Security, Co. Internal Services Dept.	A County employee, who performs a personal service for a family business, which is customarily compensated, is engaged in outside employment even if he is not actually compensated.
14-220	(j),(k)(2),(h) RQO 12-07	Evelyn Campos Director, Professional Compliance Division, County Aviation Dept. (MIA)	A County Senior Property Manager at MIA does not engage in conflicting outside employment when working on a single project developing a document outlining best practices and procedures in airport leasing for a national business consulting company that is not currently or foreseeably a County vendor or contractor.
14-230	(j)	Gerald Sanchez, Assistant County Attorney,	A County Commissioner is not prohibited from serving on the board of a local civic organization that is not a County vendor or contractor. However, the Commissioner may not lobby the County on behalf of the organization and should refrain from voting on any matters that might affect the commissioner's financial interests.
14-242	(j) RQO 07-35	Charles Anderson, Co. Commission Auditor, Office of the Commission Auditor	A County Director of Information Systems and Telecommunications at the County Aviation Department, will not have a prohibited conflict serving on a County selection committee, where he also serves on the SITA Customer Advisory Board as part of his Co. duties and SITA is one of the bidders that will be considered by the selection committee, because the Co. Director has no financial or personal interest in SITA or the contract. However, in order to avoid an appearance of impropriety created by the Director's close interaction with SITA's current Co. contract and personnel through his Co. employment, the Co. is advised to reconsider appointing the Director to the selection committee.

**INQ Summary**  
**2-11.1 (j) & (k)**  
**2011-2015**

INQ #	Code Sec.	Requester	Holding
14-246	(j) RQO 07-35	Marta Canaves, ASLA, IIDA Graduate Faculty, College of Architecture, Florida International University (FIU)	An FIU Professor of Architecture will not have a prohibited conflict serving on a Co. selection committee where she has had professional relationships with some of the bidders to be considered by the selection committee, because the Professor of Architecture would not personally benefit from the vote and she does not have a prohibited relationship with the parties. However, in order to avoid an appearance of impropriety created by the Professor's close professional relationships with some of the bidders, the Co. is advised to reconsider whether this person is an appropriate appointee for this selection committee.
14-250	(j),(l) RQO 07-35	Lynn Barrett, Chief Compliance Officer, Jackson Health Systems (JHS)	A doctor employed by JHS may not also hold financial interests in a medical tourism company (which engages in matching people in other countries with available medical services in the U.S.), and a Urgent Care Staffing company operating in the Dominican Republic because of possible impairment of independence of judgment in the performance of official duties and the prohibition against taking official actions when personal financial interests are involved.
14-261	(j), (g) RQO 09-16	Arnold Palmer, Major, Miami Dade Police Dept. (MDPD)	An MDPD Major does not have a conflict of interest involving his employment at MDPD and his work for a non-profit organization where the non-profit organization would donate an emergency response program (Project Zero) to the County. It is unlikely that the Major's independence of judgment in the performance of his public duties would be impaired because he would not be involved in the implementation of the emergency response program, and has no financial interest in the project given that the program would be donated to the County.

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**2-11.1 (j) & (k)**  
**2011-2015**

INQ #	Code Sec.	Requester	Holding
14-267	(d), (g),(j), (m),(n) RQO 11-28 RQO 12-07 RQO 07-39	Jose “Pepe” Diaz, County Commissioner, District 12	A County Commissioner is not prohibited from accepting employment with West Gables Rehabilitation Hospital (WGRH), which is not directly a County vendor, and whose status as a provider under the County’s workers compensation and health insurance programs is not subject to approval by the County Commission. The Commissioner’s work at WGRH is not likely to impair his independence of judgment in the performance of his public duties because his employment duties and responsibilities would not require him to solicit or lobby the County or any of its departments, including Jackson Health Services (JHS), on behalf of the company. However, the Commissioner would be prohibited from voting on any matters involving WGRH, he may not appear before any County board on behalf of WGRH, and he may not use his official position to secure special privileges or exemptions for WGRH.
14-273	(b)(6),(j),(k) RQO 04-48	Lynn Barrett, Chief Compliance Officer, Jackson Health Systems (JHS)	Pursuant to the Ethics Code at Section 2-11.1(b)(6) and previous Ethics Commission opinions, part-time employees are subject to the Ethics Code, including Sections 2-11.1(j)(prohibition on Conflicting employment) and 2-11.1(k) (prohibited outside employment).
14-279	(j) RQO 09-16	Charles Anderson, Office of the Commission Auditor	A selection committee member does not have a conflict to serve on a selection committee where some of the bidders considered by the committee are companies whose County projects he has previously supervised in his County employment because he has no financial, personal, or familial, relationships with these bidders that would prevent him from exercising his independent judgment in connection with his duties on the selection committee.
14-288	(j),(g) RQO 12-11  <i>directed to</i> AO 7-1	Michelle Sifontes, Chief, HR, Co. Public Works and Waste Mgmt.	County real estate officers are not permitted to engage in outside employment as private real estate agents because this type of outside employment is likely to impair the County employee’s independence of judgment in the performance of his or her public duties

**INQ Summary  
2-11.1 (j) & (k)  
2011-2015**

INQ #	Code Sec.	Requester	Holding
15-14	(j) RQO 08-29 RQO 05-140	Carolina Lopez, Deputy Supervisor, County Elections Dept.	A County employee engages in outside employment when he/she is compensated for providing marketing services to a private entity because he/she is providing the type of personal services to the non-County employer that is compensated or customarily compensated. Consequently, these employees should file the Request to Engage in Outside Employment form and the Outside Employment Statement on a yearly basis.
15-22	(j),(k) RQO 12-11  <i>directed to</i> County Code Sec. 2-11	Santiago Pastoriza, Procurement Officer, Miami-Dade County Internal Services Department (ISD)	Although opinions regarding possible conflicts of interest in outside employment and outside employment guidelines presented by the Ethics Commission staff may serve as an aid, final determination as to whether a County employee should engage in outside employment is at the discretion of his/her supervisor.
15-41	(j), (k) RQO 09-16 RQO 12-11	Joan Shen, Chief, Traffic Engineering Division, Miami-Dade County Public Works and Waste Management (PWWM)	Pursuant to Sections (j) and (k) of the County Ethics Code, a Public Works and Waste Management (PWWM) employee whose primary responsibilities include designing roadways for effective traffic flow and safety may provide interior design services for private individuals because this outside employment would not impair his independence of judgment in performing his County duties. The private employment is not related to his County duties, would not conflict with his County employment hours, would not involve work with a County vendor, and would not require him to lobby the County on behalf of his private company.

**INQ Summary  
2-11.1 (j) & (k)  
2011-2015**

INQ #	Code Sec.	Requester	Holding
15-49	(j) RQO 10-08 RQO 12-07	Neil McKay, Corporate Director, Physician Services, Jackson Health Systems	The Assistant Medical Director of JHS, whose job duties include recommending medication and medical devices to patients, and participating in JHS' Pharmacy and Therapeutics Committee (which selects drugs listed in JHS's drug formulary) should be denied permission to engage in outside employment as a paid private consultant for private medical vendors that supply drugs and/or medical devices to JHS. His outside employment is closely related to the work he performs at JHS which would likely create divided loyalties which could affect his ability to exercise independent judgment in the performance of his official duties at JHS.
15-53	(j) RQO 05-43 RQO 05-145	Clarence Brown, Division Director, County Public Housing and Community Development (PHCD)	A PHCD Director does not have a conflict of interest serving as a PHCD representative on the South Florida Workforce Investment Board because the Director's service on the board is directly connected to his public duties and he does not have any private financial interests in any of the matters considered by the board.
15-59	(j) RQO 12-11	Roberto Gonzalez, Physician, Jackson Health Services (JHS)	A supervisor at JHS has discretion to prohibit a physician from maintaining a private practice while employed by JHS as Associate Medical Director because of a perceived conflict of interest.
15-61	(v), (m)(2), (g), (j) RQO 06-52	Stanley J. Krieger, Attorney, and Board member, City of Miami Charter Review and Reform Committee (CRRC)	A City of Miami CMCRRRC board member may serve on the board at the same time that his employer has a lawsuit against the city as long as he will not be directly affected by any of the board's actions; he will not vote on matters directly affecting his employer; he will not appear before the city on behalf of his employer; and he does not use his official position to gain special privileges or exemptions for his employer.

**INQ Summary**  
**2-11.1 (j) & (k)**  
**2011-2015**

INQ #	Code Sec.	Requester	Holding
15-71	(j) COE Outside Employment Memo (2014)	Cecilia Brewer-McDuffie, Chief of Human Resources, WASD	A WASD employee may volunteer to assist a Girl Scout Troop in obtaining CPR merit badges for troop members, because the employee's volunteer activities for the Girl Scouts is unlikely to impair his/her independence of judgment in the performance of his/her public duties. Furthermore, given that such traditional volunteer work is customarily uncompensated, it is not considered outside employment. Consequently, there is no need for the employee to complete a Permission to Engage in outside Employment Form.
15-77	(j) RQO 99-50 AO 7-1	Evelyn Campos, Professional Compliance Division Director, MIA	A Property Manager at MIA, whose duties include the oversight of non-terminal leases, should not teach aviation courses for Miami-Dade College's School of Aviation, which is an MIA leaseholder, because it is likely that this type of outside employment will create conflicting loyalties which will impair her independence of judgment in the performance of her official duties.
15-98	(p),(j) RQO 12-11	LaCelveia Morley, Asst. to the Director, on behalf of Kevin Kirwin, Parks Director, City of Miami	The County's Ethics Code does not specifically prohibit the appointment of the City Parks Director to Friends of Belafonte-Tacolcy Park (FOBT), a nonprofit organization formed to raise funds on behalf of Belafonte-Tacolcy Center, Inc. (BTC), which contracts with the City to provide after-school programs. However, the Director should decline appointment to FOBT because as the city's Parks Director, he oversees the Belafonte-Tacolcy Park and the appointment may place him in a situation where he or his board might recommend the continued services of BTC, in violation of section 2-11.1(p) of the County's Ethics Code. Also, the director's efforts on behalf of FOBT could interfere with his independence of judgment regarding allocation of City resources to BTC or to other parks under his supervision.
15-100	(g), (j),(k), (c)(2), (d), (m)(1) RQO 00-13	James Wright, Security Supervisor, Miami-Dade County Water & Sewer Department (WASD)	A County employee may contract with the County through his privately-owned security company, but he may not contract with WASD, the department that employs him, and he may not lobby the County for the contract.

**INQ Summary**  
**2-11.1 (j) & (k)**  
**2011-2015**

INQ #	Code Sec.	Requester	Holding
15-110	(k) <i>plain meaning</i>	Carmen Bofill, Miami-Dade County Dept. of Elections	County and municipal employees engaged in outside employment are required to file an Outside Employment Statement with the County's Elections Department by noon, July 1st of each year.
15-114	(h),(j), (k)(2), (m)	Jose Garrido, Staff Member to Javier Souto, County Commissioner, Dist. #10	A County employee is not prohibited from serving as an unpaid volunteer for the Westchester Chamber of Commerce (Chamber), a nonprofit organization, because such service is not considered "outside employment". The employee is advised not to disclose any confidential information he might have acquired through his public position; not to appear before any County board or agency on behalf of the Chamber; and avoid taking any position or being involved with any activity within the Chamber that would be inconsistent with his public duties.
15-115	(j),(k),(w) RQO 12-07 RQO 05-110	Eugene Shy, Assistant County Attorney, Jackson Health Systems	A County employee does not engage in conflicting outside employment by working as a consultant for a County vendor that manufactures medical equipment and products where the County employee has no involvement or authority over the contract in his public position. However, the outside employment would likely be prohibited if it would require him to travel on behalf of this employer, since the County Ethics Code prohibits a County employee from accepting travel-related expenses from a County vendor unless he obtains a waiver from the Board of County Commissioners.
15-123	(j) RQO 09-16	Robert Warren, Real Estate Advisor, Miami-Dade County ISD and RER	A County Real Estate Advisor does not have a conflict of interest to serve on a City of Miami Beach evaluation committee for ATM's in city-owned facilities because he has no involvement with ATM's in his County position and has no financial, personal, or familial relationships with ATM bidders that would prevent him from exercising his independent judgment in connection with his duties on the city's evaluation committee.



**INQ Summary**  
**2-11.1 (j) & (k)**  
**2011-2015**

INQ #	Code Sec.	Requester	Holding
15-126	(k)(2) <i>plain meaning</i> INQ 05-30	Aylin Concepcion, Administrative Coordinator, Medical Examiner	Pursuant to Section 2-11.1(k) (2) of the County Ethics Code, the Outside Employment Statement form must be filed by July 1 <sup>st</sup> of each year with the Elections Dept. The disclosure form must include the amount of money received from the outside employment.
15-127	(k) <i>plain meaning</i> INQ 11-16	Carmen Bofill, Miami-Dade County Dept. of Elections	Elected officials are not required to file a County Outside Employment Statement for work performed outside of their County or municipal duties. However, they must file State financial disclosure forms as required by Chapter 112, Florida Statutes.
15-138	(k) INQ 09-126	Carmen Bofill, Clerk 3, Miami-Dade Elections Department	A County employee may volunteer as a County Reserve Police Officer without it constituting outside employment under the County Ethics Code because it is an all-volunteer position in the County and no compensation is provided.
15-157	(j), (g)	Aleem Ghany, City Manager, City of North Miami	The City Clerk in North Miami would not have a prohibited conflict of interest serving as Deputy City Manager provided he does not hold both offices simultaneously or use his official position as city clerk to secure privileges in obtaining the position of deputy city manager.
15-164	(j)	Dale Poster-Ellis, Division Director, ITD	A Co. employee working in the ITD department as a computer programmer should not be transferred to a position involving preparing reports for a financial audit that is conducted by an auditing firm that employs her spouse. The spouse is the Head Partner of the Miami office of this firm, and is responsible for overseeing the team that is conducting the audit. The transfer would likely create conflicting employment for this employee, placing her in a situation where her independence of judgment in the performance of her Co. duties could be compromised.
15-165	(k) COE Outside Employment Memo (2014)	Rafael Granado, City Clerk, City of Miami Beach	A city employee who provides paid lodging services to out of town guests must seek permission to engage in outside employment and file the required permission and disclosure forms.

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**2-11.1 (j) & (k)**  
**2011-2015**

INQ #	Code Sec.	Requester	Holding
15-172	(j), (g) RQO 07-35	Natalia Milian, Director, Miami-Dade County Hispanic Affairs Advisory Board	A County board member is not prohibited from serving as an unpaid member of a Miami-Dade County School Board task force. The board member's responsibilities to the School Board are not likely to impair her independence of judgment in the performance of her public duties on behalf of the County board.
15-192	(d), (j) RQO 10-18  Art.III §3, Public Health Trust ByLaws	Chris Kokoruda, Assistant County Attorney, County Attorneys' Office	A governing member of the Sylvester Cancer Comprehensive Center (SCCC) which is owned and operated by the University of Miami, which has a contract with the Public Health Trust (PHT), may not serve as a board member of the PHT because his relationship with SCCC will create an ongoing <i>per se</i> voting conflict for him whenever matters involving SCCC come before the PHT.
15-193	(j),(k)(2), (m)(1) RQO 07-02 RQO 12-10	Othello Jones, Benefits Coordinator, Co. Water & Sewer Department, (WASD)	A Co. employee with WASD should be denied permission to engage in outside employment as a "qualifier" for a private construction company seeking to do business with the Co. Working as a "qualifier" would likely impair his independence of judgment in the performance of his public duties because this type of work conflicts with the working hours at his Co. employment. However he is not prohibited from working as a general contractor where he would not be involved with any Co. employee, and where the work would be performed outside of his Co. hours. However, his work cannot require him to interact with Co. staff on behalf of third party clients, even if these interactions are routine and ministerial in nature.
15-203	(j), (p) RQO 12-09 RQO 05-27	Pete J. Betancourt, Senior Procurement Contract Officer, County Aviation Dept. (MDAD)	Where Co. bid documents require firms to provide references as part of their application, bidders are not prohibited from requesting professional references from Co. employees as long as this does not impair the employees' independence of judgment in the performance of their public duties.

**INQ Summary**  
**2-11.1 (j) & (k)**  
**2011-2015**

INQ #	Code Sec.	Requester	Holding
15-205	(j)	Pete J. Betancourt, Senior Procurement Contract Officer, Co. Aviation Dept. (MDAD)	A member of an evaluation/selection committee who is employed by a private entity providing a reference to a vendor appearing before the committee is prohibited from serving on the selection committee because it is likely that his independence of judgment would be impaired in a situation where he is evaluating proposals in a public selection process, while being under the oversight of his private employer, which is competing in the process.
15-216	(j) RQO 09-16	Cassandra Henderson, Zoning Development Analyst, M-D Cty. Dept. of Regulatory & Economics Resources (DRER)	A Co. Zoning Development Analyst for DRER does not have a prohibited conflict of interest in serving as a real estate broker in Broward Co. because her activities in Broward Co. are unlikely to impair her independence of judgment in the performance of her public duties on behalf of Miami-Dade Co.