

MIAMI-DADE COMMISSION ON ETHICS AND PUBLIC TRUST

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Via email at:

sapneiltutoringmiami@gmail.gov

November 8, 2016

Sapneil S. Parikh
Sapneil Tutoring, Inc.
1405 SW 107th Avenue, Suite 205 C
Miami, FL 33174

*Please submit this letter to
the Procurement
Department. The Ethics
Commission does not submit
this letter on your behalf*

Re: INQ 16-250, Limitations on Doing Business with the County

Dear Mr. Parikh:

On October 31, 2016, you asked about limitations in contracting with the County through your privately owned company, Sapneil Tutoring, Inc. (Sapneil Tutoring). Your mother, Daksha Parikh, is employed by the Miami-Dade County Office of Management and Budget as an Accountant 1 in the Grants Coordination Division.

The County Ethics Code at Secs. 2-11.1 (c)(2) and (d) allows you to enter into a contract, individually or through a firm, with Miami-Dade County, as long as the contract does not interfere with the full and faithful discharge of your mother's duties to the County.

This means that Daksha Parikh shall not participate in determining the contract requirements or in awarding the contract. Additionally, none of Ms. Parikh's job responsibilities and job descriptions shall require her to be involved in the contract in any way including, but not limited to, its enforcement, oversight, administration, amendment, extension, termination or forbearance. In your case, this means that Sapneil Tutoring, Inc., shall not enter into contracts with the Miami-Dade County Office of Management and Budget.

This opinion construes the Miami-Dade County Ethics Code as it applies to County employee-vendors at Secs. 2-11.1 (c)(2) and (d) only. It is not applicable to any conflicts under other sections of the County Code or to issues related to state or federal laws.

If any of the facts you have presented change or if you have further questions, please feel free to contact me at 305 350-0601.

Sincerely,

A handwritten signature in black ink that reads "Gilma Diaz-Greco". The signature is written in a cursive style with a large initial "G" and "D".

Gilma Diaz-Greco
Staff Attorney

INQ 16-250
Parikh

November 8, 2016
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Diaz-Greco, Gilma M. (COE)

From: Diaz-Greco, Gilma M. (COE)
Sent: Wednesday, November 09, 2016 3:27 PM
To: 'Sapneil Tutoring Inc.'
Subject: RE: Sapneil Tutoring - letter

Thank you. Letter will follow shortly.

From: Sapneil Tutoring Inc. [mailto:sapneiltutoringmiami@gmail.com]
Sent: Wednesday, November 09, 2016 3:13 PM
To: Diaz-Greco, Gilma M. (COE) <Gilma.Diaz-Greco@miamidade.gov>
Subject: Sapneil Tutoring - letter

Hi:

As discussed , the letter on ethics is for being able to register as a certified vendor for tutoring services at Miami dade public schools. I do not anticipate working with the Miami dade- office of management & budget.

Sincerely,

**Sapneil Parikh MS, MPH | Sapneil Tutoring Inc. | Principal & Founder | (P) [305 968 6364](tel:3059686364) |(F) 786 899 0365|www.sapneiltutoring.com | [1405 SW 107th Avenue, Suite 205 C](http://www.sapneiltutoring.com)
Find Us On Facebook!<http://www.facebook.com/sapneiltutoring>
Follow Us On Twitter! <http://www.twitter.com/sapneiltutoring>**

Sent from my iPhone

Sanchez, Rodzandra (COE)

From: Diaz-Greco, Gilma M. (COE)
Sent: Wednesday, November 09, 2016 3:46 PM
To: Sanchez, Rodzandra (COE)
Subject: Sapneil Parikh, Sapneil Tutoring, Inc. Limitations on Doing Business with the County) INQ 16-250
Attachments: INQ 16-250 Parikh.pdf; Parikh applic.pdf; Daksha Parikh bluebook.pdf; Sapneil email.pdf

INQ 16-250 Parikh

From: Diaz-Greco, Gilma M. (COE)
Sent: Wednesday, November 09, 2016 3:44 PM
To: 'Sapneil Tutoring Inc.' <sapneiltutoringmiami@gmail.com>
Subject: Limitations on Doing Business with the County Ethics Opinion INQ 16-250

Dear Mr. Parikh:

Attached is the Limitations on Doing Business with the County Ethics Opinion. Please note that it indicates that you **may** enter contracts with Miami-Dade County, but not with the **Miami-Dade County Public Office of Management and Budget** which employs your mother, Daksha Parikh, as an accountant 1. Further, your parent may not **may not lobby for any contract you may seek with the County**. (See the County Ethics Code at Secs. 2-11.1 (c) and (m)(1).).

You may print or forward this letter to the Procurement Department, you may also print a copy for your records. Please do not hesitate to contact me if you have further questions.

Sincerely,

Gilma (Mimi) Diaz-Greco
Staff Attorney



Miami-Dade Commission on Ethics and Public Trust
19 W. Flagler Street, Suite 820
Miami, FL 33130
Tel: (305) 579-2594
Fax: (305) 579-0273
gdiazgr@miamidade.gov
www.facebook.com/MiamiDadeEthics

From: Sapneil Tutoring Inc. [<mailto:sapneiltutoringmiami@gmail.com>]
Sent: Monday, October 31, 2016 2:08 PM
To: Diaz-Greco, Gilma M. (COE) <Gilma.Diaz-Greco@miamidade.gov>
Subject: procurement form-Sapneil Tutoring

Hi Gilma -

It was nice speaking to you earlier today. I have attached the procurement form for my vendor registration. Please let me know if there is any additional information you may need.

My BlueBook Profile

Search for County Employee

Select Department

Select Department ▼

Last Name First Name Office Number (305-xxx-xxxx)

Parikh [] [] []

Exact Match

Locate Clear [My Blue Book Info](#)

Results

This is 1 out of 1 pages of results.

First Name	Last Name	Position	Division	Department	Email Address	Phone Number	Office Location
DAKSHA	PARIKH	ACCT 1	GRANTS COORDINATION	MANAGEMENT AND BUDGET	DAKSHA@miamidade.gov	305-375-1227	111 NW 1ST ST Miami FL 33128

This is 1 out of 1 pages of results.

A production of the Communications Department (COM). Enabled by the Information Technology Department (ITD).

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Relatives of County Employees
Wishing to Register as County Vendors

Please submit the following information by mail, fax, **or** email to—

Gilma Diaz-Greco, Staff Attorney
The Commission on Ethics & Public Trust
19 West Flagler St., Suite 820
Miami, FL 33130

Phone: (305) 350-0638
Fax: (305) 579-0273
Email: gdiazgr@miamidade.gov

YOUR NAME Sapneil S. Parikh
Name of Your Business Sapneil Tutoring Inc.
Type of Business Tutoring & Test Preparation
Your Mailing Address 1405 SW 107th Ave, Ste 205 C Miami, FL 33174
Your Daytime Phone 305-968-6364
Your Email sapneil/tutoringmiami@gmail.com
Name of county employee who is related to you Daksha Parikh
Type of relationship— spouse? child? parent? other? Parent - Mom
County employee's department, if known Office of management & Budget
County employee's title, if known Accountant I
Please list the **names, titles, and departments** of any other immediate family members currently employed by Miami-Dade Co.

The Miami-Dade County Conflict of Interest & Code of Ethics at § 2-11.1 (c)(2) allows immediate family members of County employees to contract with the County in certain circumstances and if the following criteria are met. Please confirm that you and your immediate family member/s will be able to meet all of these criteria:

1. Entering into a contract with the County will not interfere with the full and faithful discharge of the County employee's duties to the County.
2. The County employee will not participate in determining your contract requirements.
3. The County employee will not participate in awarding the contract.
4. The County employee's job responsibilities and job description will not require him/her to be involved in the contract in any way including, but not limited to, its enforcement, oversight, administration, amendment, extension, termination, or forbearance.
5. The County employee will not be working in the County department that enforces, oversees, or administers your contract.

I have read these requirements and pledge to abide by them.


Signature

10/31/2016
Date

Your ethics opinion will be sent to you by first class mail and email, unless you request another type of delivery.

COE 11/2013