



## Miami-Dade Commission on Ethics & Public Trust

### Investigative Report

Investigator: Robert Steinback

|                            |   |  |                     |
|----------------------------|---|--|---------------------|
| Case PI15-034              | Case Name: Negahban                       | <u>Date Open:</u><br>September 3, 2015 | <u>Date Closed:</u> |
| Complainant(s):<br>Unknown | Subject(s): Sharareh<br>"Sherry" Negahban | <b>CASE<br/>CLOSED</b>                 |                     |

Allegation(s):

Date: 10/2/2015

An anonymous citizen complainant alleges that subject Sharareh "Sherry" Negahban (Negahban), Division Chief for Regulatory Compliance for the Miami-Dade County Water and Sewer Department (WASD), is engaged in outside employment without having received permission from her supervisor, or filing an outside employment statement with the Elections Department.

Relevant Ordinances:

Negahban is alleged to be in violation of Sec. 2-11.1 (k)(2) of the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance, which states in relevant part, "All full-time County and municipal employees engaged in outside employment for any person, firm, corporation or entity other than Miami-Dade County ... shall file, under oath, an annual report indicating the source of the outside employment, the nature of the work being done pursuant to same and any amount or types of money or other consideration received by the employee from said outside employment.

- Negahban is also alleged to be in violation of Sec. 2-11 (b) and (c) of the Miami-Dade

County Outside Employment by County Employees Ordinance, which states as follows:  
(b) When permitted. *A full-time County employee may accept incidental or occasional outside employment so long as such employment is not contrary, detrimental or adverse to the interest of the County or any of its departments and the approval required in subsection (c) is obtained.*

(c) Approval of department head required. *Any outside employment by any full-time County employee must first be approved in writing by the employee's department head who shall maintain a complete record of such employment.*

**Investigation:**

*Interviews*

**Sharareh “Sherry” Negahban**, by telephone, September 22, 2015.

Negahban acknowledged setting up the Florida limited liability company Gorgee Properties LLC, for the purpose of leasing a condominium she owns at 10985 SW 107<sup>th</sup> St., Apartment 204. Negahban said she had previously lived in the unit for 15 years until moving recently.

Negahban said this condominium is the only unit she owns and rents, and the only one managed by Gorgee Properties.

*Document/Audio/Video Review:*

- Copy of real estate listing for 10985 SW 107<sup>th</sup> St., #204. The owner is listed as Sharareh Negahban.
- Copy of Florida Department of State Division of Corporations Electronic Filing Cover Sheet and Articles of Organization for Gorgee Properties LLC, showing Negahban as manager and John G. Admire, Esq., as Registered Agent. The company came into

existence on April 17, 2014.

**Analysis**

Negahban acknowledges owning and leasing a single condominium unit. Miami-Dade and Broward property records show no other property owned by Negahban.

By renting out only one unit, Negahban is below the three-unit leasing threshold that triggers a presumption that landlord operations amount to reportable outside employment.

**Conclusion(s):**

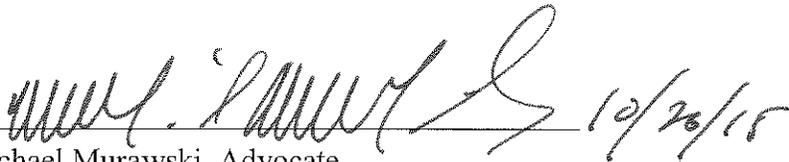
After consulting with Ethics Advocate Murawski, it was determined that there is no evidence that Negahban is in violation of the ethics code, accordingly this matter is closed with no further action.

(Signature)

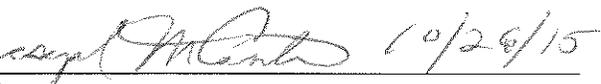


Robert Steinback, COE Investigator

Approved by:



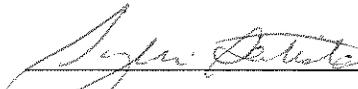
Michael Murawski, Advocate



Joseph Centorino, Executive Director

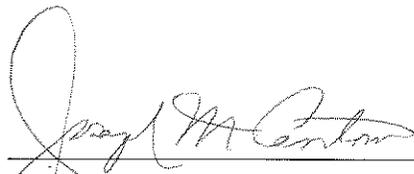
personal benefit to the Commissioner of obtaining an advanced degree fully at taxpayers' expense outweighs whatever benefit the public receives for the expense involved. In such circumstances, it would be sensible to restrict Commissioners to the same criteria used for reimbursement of tuition afforded to regular County employees.

Alternatively, perhaps a monetary limit should be established for expenditures related to so-called "self-improvement" courses and any expenditure in excess of \$5000.00 for educational purposes should require Commission approval prior to the funds being expended. Such a procedure would, at least, provide more accountability and transparency.

  
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Sylvia Batista, COE Investigator

Approved by:

  
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Michael Murawski, Advocate

  
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Joseph Centorino, Executive Director

Date: 10/26/2015

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