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2019 DEC 19 AM 11:33

**MIAMI-DADE COMMISSION ON ETHICS & PUBLIC TRUST**



CLERK, CIRCUIT & COUNTY CTB  
MIAMI-DADE COUNTY, FLA.  
#1

In Re:  
Felix Becerra

C 19-41-10

**PUBLIC REPORT AND FINAL ORDER**

The complainant, Thom Mozloom (Mozloom), a vendor of The Children’s Trust (the Trust), filed this complaint against Felix Becerra (Becerra), the Trust’s Communications Manager, alleging that Becerra violated the Cone of Silence ordinance (Cone) found at Section 2-11.1(t) of the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance by meeting with Mozloom, a Mini-Bid proposer, on August 21, 2019, and engaging in communication prohibited by the Cone.

Investigation revealed that Becerra had been misinformed by Trust officials on the applicability of the Cone to the Trust’s mini-bids for communications-related services. Relying on erroneous information, Mozloom’s firm made an oral presentation before Becerra and Nufiez<sup>1</sup> which was not duly noticed as required by the Cone. Becerra also met with Mozloom during a “question and answer” session while the Cone was in effect. The meeting was not noticed or recorded.

Pursuant to the Trust’s Conflict of Interest Policy at Section III.B.5, oral communications requested by a review committee are allowed and there is no notice or recording requirement imposed by the policy.

On December 11, 2019, the Ethics Commission voted to find probable cause but dismissed the complaint and ordered the issuance of a Letter of Instruction, finding that the violation was unintentional, and the public interest would not be served by proceeding further.

Wherefore it is:

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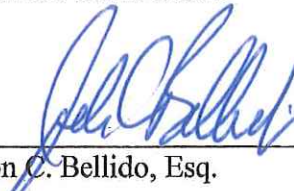
<sup>1</sup> Ximena Nufiez is the Trust’s Director of Communications.

**ORDERED AND ADJUDGED** that COMPLAINT C 19-41-10 against Respondent Felix Becerra is hereby concluded.

**DONE AND ORDERED** by the Miami-Dade County Commission on Ethics & Public Trust in public session on December 11, 2019.

MIAMI-DADE COUNTY COMMISSION ON  
ETHICS & PUBLIC TRUST

By:



\_\_\_\_\_  
Nelson C. Bellido, Esq.  
Chair

Signed on \_\_\_\_\_

12/16/2019