



MIAMI-DADE COMMISSION ON ETHICS AND PUBLIC TRUST

19 West Flagler Street, Suite 820 · Miami, Florida 33130

Phone: (305) 579-2594 · Facsimile: (305) 579-0273

Website: ethics.miamidade.gov

MEMORANDUM

TO: Farah Pierre-Louis, Senior Call Center Specialist, Miami-Dade
Communications Department

FROM: Gilma Diaz-Greco, Staff Attorney
Commission on Ethics

SUBJECT: INQ 19-87

DATE: 9-30-19

CC: All COE Legal Staff; Office of Commissioner Barbara J. Jordan, District
1; Victoria Goss, Training Coordinator, Neighbors and Neighbors
Association

Thank you for contacting the Miami-Dade Commission on Ethics and Public Trust and requesting our guidance regarding County employees applying for Mom and Pop Grants which are funded by Miami-Dade County.

Facts:

You are employed by the Miami-Dade County Communications Department as a Senior Call Center Specialist. You would like to apply for a Mom and Pop Grant for your privately-owned company, Brookridge Pointe Inc., DBA Pretty House Apparel ("Pretty House"). Mom and Pop Grants are funded by Miami-Dade County. Neighbors and Neighbors Association, a not-for-profit organization, administers and makes recommendation regarding the Mom and Pop Grant applications; funds are distributed by the Commission offices of the 13 County Districts to businesses that meet the requirements of the grants. Pretty House is applying for a Mom and Pop Grant funded through Commissioner Barbara J. Jordan's District 1 Office.

Issue:

Whether the County Ethics Code would prevent your privately-owned company, Pretty House, from accepting a Mom & Pop Grant.

Discussion and Opinion

Your inquiry involves several sections of the County Ethics Code which are analyzed below:

A. Outside Employment

Work conducted for Pretty House, your privately-owned business, constitutes outside employment. The County Ethics Code prohibits County employees from engaging in conflicting outside employment. Conflicting employment is sometimes created when a County employee comes in contact with the same or similar people or entities in both his outside employment and in his County job or when he uses the same or similar resources in his outside employment as he uses in his County work. Also note that you may not use County time or resources in the performance of your outside employment. *See* County Ethics Code §§ 2-11.1 (g) and (j), Miami-Dade Code 2-11, and Administrative order 7-1.

Please note that this letter does not grant you permission to engage in outside employment. You must obtain permission to engage in outside employment annually from your supervisor and file related financial disclosure forms annually.

B. Mom and Pop Grant

Once you have been granted permission to engage in outside employment, your company, Pretty House may *accept the Mom and Pop Grant*, as long as the Communications department which employs you, is not involved in any way in processing or administering of the grant. This includes the condition that you may not participate in determining or awarding the grant. Additionally, none of your job responsibilities and job descriptions may require you to be involved in the grant in any way including, but not limited to, its enforcement, oversight, administration, amendment, extension, termination or forbearance. *See* County Ethics Code §§ 2-11.1 (c) and (n).

C. Lobbying

Additionally, you may not lobby the County. In this case, it means that you may not contact anyone within the County in an attempt to influence a decision about Pretty House's application for a Mom and Pop Grant. *See* County Ethics Code §2-11.1 (m)(1).

D. Exploitation of Official Position

Finally, the County Ethics Code prohibits County employees from exploitation of their official position. This means that you may not use your County position to secure **special privileges or exemptions** with respect to any grant program which your company is applying for. *See* County Ethics Code § 2-11.1(g).

This opinion is limited to the facts as you presented them to the Commission on Ethics and is limited to an interpretation of the County Ethics Code only and is not intended to interpret state laws. Questions regarding state ethics laws should be addressed to the Florida Commission on Ethics.

INQs are informal ethics opinions provided by the legal staff after being reviewed and approved by the Executive Director. INQs deal with opinions previously addressed in public session by the Ethics Commission or within the plain meaning of the County Ethics Code. RQOs are opinions provided by the Miami-Dade Commission on Ethics and Public Trust when the subject matter is of great public importance or where there is insufficient precedent. While these are informal opinions, covered parties that act contrary to the opinion may be referred to the Advocate for preliminary review or investigation and may be subject to a formal Complaint filed with the Commission on Ethics and Public Trust.

**Request for Opinion from Commission on Ethics
Acquiring Financial Interest**

I, Farah Pierre-Louis, the owner or president of
(Owner or President Name)
Brockridge Pointe Inc.
DBA Pretty House Apparel, whose business address is
(Business Name)

20709 N.W. 2 Ave. Miami Gardens, Fl. 33169
(Business Address, City, State, Zip)

786 344-8277 pierrelouis@bellsouth.net
(Phone #) (Email)

Include a short description of the type of business operating women's
clothing store

Are you currently an employee or board member of any Miami Dade County Board?
Yes No

If yes, what Department or Board? Miami-Dade Communications

If yes, are you seeking to contract with Miami Dade County? Yes No:

I am being considered for funding through the Mom and Pop Small Business Grant Program and request the clearance from the Commission on Ethics. Please review my request and forward to Neighbors And Neighbors Association, Inc. to the attention of Leroy Jones, Executive Director, 5120 NW 24th Ave, Miami, FL 33142 or fax (305) 756-6008. Thank you in advance for your attention to this very important matter.

Commissioner, Barbara J Jordan
111 NW 1st Street
Miami, FL 33128

This page must be completed.



[Department of State](#) / [Division of Corporations](#) / [Search Records](#) / [Detail By Document Number](#) /

Detail by Entity Name

Florida Profit Corporation
BROOKRIDGE POINTE INC.

Filing Information

Document Number	P09000092357
FEI/EIN Number	37-1590669
Date Filed	11/09/2009
Effective Date	11/09/2009
State	FL
Status	ACTIVE

Principal Address

20709 NW 2 AVE
MIAMI, FL 33169

Changed: 09/29/2015

Mailing Address

20709 NW 2 AVE
MIAMI, FL 33169

Changed: 09/29/2015

Registered Agent Name & Address

PIERRE-LOUIS, FARAH
20709 NW 2 AVE
MIAMI, FL 33169

Address Changed: 04/25/2016

Officer/Director Detail

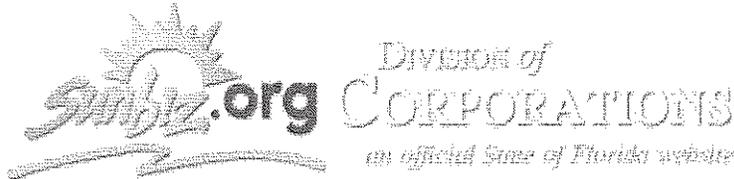
Name & Address

Title P

PIERRE-LOUIS, FARAH
20709 NW 2 AVE
MIAMI, FL 33169

Annual Reports

Report Year	Filed Date
2017	04/21/2017



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[Filing History](#)

Fictitious Name Detail

Fictitious Name

PRETTY HOUSE APPAREL

Filing Information

Registration Number G11000041655
Status ACTIVE
Filed Date 04/29/2011
Expiration Date 12/31/2021
Current Owners 1
County MIAMI-DADE
Total Pages 3
Events Filed 2
FE/EIN Number 37-1590669

Mailing Address

20709 NW 2 AVE.
MIAMI, FL 33169

Owner Information

BROOKRIDGE POINTE INC
 20709 NW 2 AVE
 MIAMI GARDENS, FL 33169
FE/EIN Number: 37-1590669
Document Number: P09000092357

Document Images

[04/29/2011 -- Fictitious Name Filing](#)

[11/30/2016 -- Fictitious Name Renewal Filing](#)

[09/28/2015 -- CHANGE NAME/ADDRESS](#)

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Employee Search

Select Department

COMMUNICATIONS

First Name

Last Name

Email Address

Office Phone

__-__-__

Locate

Clear

First	Last	Position	Department	Email Address	Phone
FARAH	PIERRE-LOUIS	311 SENIOR CALL CENTER SPCLIST	203	fpl@miamidade.gov	305-499-8710

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