

**Meyers, Robert (COE)**

INQ 08-158

**From:** Meyers, Robert (COE)  
**Sent:** Thursday, October 02, 2008 4:47 PM  
**To:** Hall, Beverly (GSA)  
**Cc:** Lee, Shawonna (GSA); Perez, Jose (GSA); Murawski, Michael P. (COE)  
**Subject:** RE: Ethics Commission Outside Employment Opinion - revised 8-6-08

Beverly,

Assuming that these restrictions violate State law, the only option is for GSA to deny outside employment to all employees who wish to engage in these activities. We don't want to impose illegal restrictions, but we can't permit County employees to violate the local ethics laws, either. Therefore, it appears that employees have no choice but to give up this type of outside employment.

If you would like me to present this item to the Ethics Commission, I can do that at our next meeting. If I take it to the Ethics Commission, it would be useful to have Mr. Perez at the meeting to explain why our restrictions violate State law. There may be the possibility of a compromise here, but I seriously doubt it.

Please let me know at your earliest convenience whether you wish to go before the Ethics Commission.

Thanks,

Robert Meyers, Executive Director  
 Miami-Dade Commission on Ethics and Public Trust

**From:** Hall, Beverly (GSA)  
**Sent:** Tuesday, September 30, 2008 4:34 PM  
**To:** Meyers, Robert (COE)  
**Cc:** Lee, Shawonna (GSA); Perez, Jose (GSA)  
**Subject:** FW: Ethics Commission Outside Employment Opinion - revised 8-6-08

Robert,

I made some minor corrections to the statement. However, I was not aware that Jose Perez, Director, Design & Construction Services Division, had not reviewed it. Upon his review, he had some issues with its content and would like to discuss them with you. It appears that some of the restrictions may be contradictory to State licensing laws. **Please call him at 305 375-1461 or 786 295-5881 (cell).** Thank you.

**From:** Hall, Beverly (GSA)  
**Sent:** Monday, September 29, 2008 5:21 PM  
**To:** Meyers, Robert (COE)  
**Subject:** FW: Ethics Commission Outside Employment Opinion - revised 8-6-08

Robert,

Can you please review the attached form which will be presented to GSA employees to sign when they have outside employment that involves construction/contractor related duties? Thanks.

**From:** Lee, Shawonna (GSA)  
**Sent:** Monday, September 29, 2008 5:05 PM  
**To:** Hall, Beverly (GSA)  
**Subject:** Ethics Commission Outside Employment Opinion - revised 8-6-08

10/2/2008

**Meyers, Robert (COE)**

**From:** Hall, Beverly (GSA)  
**Sent:** Tuesday, September 30, 2008 4:34 PM  
**To:** Meyers, Robert (COE)  
**Cc:** Lee, Shawonna (GSA); Perez, Jose (GSA)  
**Subject:** FW: Ethics Commission Outside Employment Opinion - revised 8-6-08  
**Attachments:** Ethics Commission Outside Employment Opinion - revised 8-6-08.doc

Robert,

I made some minor corrections to the statement. However, I was not aware that Jose Perez, Director, Design & Construction Services Division, had not reviewed it. Upon his review, he had some issues with its content and would like to discuss them with you. It appears that some of the restrictions may be contradictory to State licensing laws. **Please call him at 305 375-1461 or 786 295-5881 (cell).** Thank you.

---

**From:** Hall, Beverly (GSA)  
**Sent:** Monday, September 29, 2008 5:21 PM  
**To:** Meyers, Robert (COE)  
**Subject:** FW: Ethics Commission Outside Employment Opinion - revised 8-6-08

Robert,

Can you please review the attached form which will be presented to GSA employees to sign when they have outside employment that involves construction/contractor related duties? Thanks.

---

**From:** Lee, Shawonna (GSA)  
**Sent:** Monday, September 29, 2008 5:05 PM  
**To:** Hall, Beverly (GSA)  
**Subject:** Ethics Commission Outside Employment Opinion - revised 8-6-08

Hello Beverly,

Please review/approve the attached document.

PS. I came by your office today but you were on your lunch break.

Thank you in advance,

Shawonna Lee



## Ethics Commission Outside Employment Opinion

Employee Name: \_\_\_\_\_

Pursuant to Code Section 2-11.1(m) (1) and inquiries issued 2/1/05 to 5/1/05, the Ethics Commission concluded that a County employee can activate his/her General Contractor's license and can contract for small construction projects with private clients as long as he/she is not involved in the oversight of any of these projects as a County employee, and he/she receives permission from his department to engage in outside employment. Further, he/she may not interact with County staff on behalf of his/her clients unless he/she is asking the County to process routine administrative matters for his/her private clients, INQ 05-29 (i.e. filing documents, interacting with County staff only if the purpose of the meeting is to discuss a form being filled out incorrectly or if information/documentation is missing from the application and other similar administrative issues). Otherwise, the employee is prohibited from appearing in an attempt to convince another County employee to sign off on a document or to approve a plan.

The underlying concern is a fairly obvious one; that is, County employees foster relationships throughout the County and some may on occasion attempt to capitalize on these relationships to benefit their third party clients. These situations may create conflicts of interest for all affected parties.

I have read and understood the above opinion from the Ethics Commission:

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date