



ETHICS COMMISSIONERS October 6, 2008

Kerry E. Rosenthal, CHAIRPERSON  
Dawn E. Addy, VICE CHAIRPERSON  
Magda Abdo-Gomez  
Judge Seymour Gelber  
Erica Wright

ROBERT A. MEYERS  
EXECUTIVE DIRECTOR

MICHAEL P. MURAWSKI  
ADVOCATE

ARDYTH WALKER  
STAFF GENERAL COUNSEL

Pervanche Leon Sparks, President  
VENDORS R US, INC.  
20530 NW 9<sup>th</sup> Place  
Miami, FL 33169

**Via First Class Mail  
and  
Fax at 305.651.9393**

Re: INQ 08-159

VENDORS R US, INC., may register as a County vendor, as long as VENDORS R US, INC., does not contract with or is supervised by the County Fire Rescue Department and/or by Louis Sparks. (Miami-Dade Co. Conflict of Interest & Code of Ethics at § 2-11.1 (c) & (d).)

Dear Ms. Sparks:

In correspondence to our office on September 17 and October 6, 2008, you said that you wish to register your business, VENDORS R US, INC., as a County vendor.

The facts as we understand them are as follows:

1. Your spouse, Louis Sparks, is Fire Lieutenant with the Miami-Dade County Fire Rescue Department.
2. VENDORS R US, INC., a business managed by you as Principal and President, services snack and beverage vending machines.
3. VENDORS R US, INC., is seeking to register as a vendor in order to do business with the County.

It is the opinion of the Ethics Commission that VENDORS R US, INC., may register to contract with the County as long as any contract does not interfere with the full and faithful discharge of Louis Sparks' duties to the County. This includes the requirement that Louis Sparks not participate in determining the contract requirements or in awarding the contract. Additionally, none of Louis Sparks' job responsibilities and job descriptions may require him to be involved in the contract in any way including, but not limited to, its enforcement, oversight, administration, amendment, extension, termination, or forbearance. Finally, Louis Sparks may not work in any County department that will enforce, oversee, or administer the contract.

If any of the facts you have presented change, or if you have further questions, please do not hesitate to contact me at 305.350.0601.

Sincerely,

  
VICTORIA FRIGO  
Staff Attorney

TRANSMISSION VERIFICATION REPORT

TIME : 10/06/2008 14:38  
NAME : COMMISSION ON ETHICS  
FAX : 3055790273  
TEL : 3055792594  
SER.# : 000A6J636638

DATE, TIME	10/06 14:38
FAX NO./NAME	3056519393
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3. VENDORS R US, INC., is seeking to register as a vendor in order to do business with the County.

It is the opinion of the Ethics Commission that VENDORS R US, INC., may register to contract with the County as long as any contract does not interfere with the full and faithful discharge of Louis Sparks' duties to the County. This includes the

INQ 08-159

### Relatives of County Employees Wishing to Register as County Vendors

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

Victoria Frigo, Staff Attorney  
The Commission on Ethics & Public Trust  
19 West Flagler St., Suite 820  
Miami, FL 33130

Phone: (305) 350-0601  
Fax: (305) 579-0273  
Email: [frigov@miamidade.gov](mailto:frigov@miamidade.gov)

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COMMISSION ON ETHICS  
AND PUBLIC TRUST

YOUR NAME *wife's* Pervanche Leon Sparks

Name of Your Business Vendors R Us Inc

Type of Business Vending Machines

Your Mailing Address 20530 NW 9 PL Miami FL 33169

Your Daytime Phone (786) 487-5600

Your Fax, if you wish to receive approval letter by fax. (305) 651-9393

Name of county employee who is related to you Louis Sparks

Type of relationship— spouse? child? parent? other? Spouse

County employee's department, if known Miami Dade Fire Rescue

County employee's title, if known Fire Fighter

Please list the names, titles, and departments of any other immediate family members currently employed by Miami-Dade Co. N/A

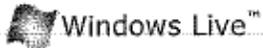
The Miami-Dade County Conflict of Interest & Code of Ethics at § 2-11.1 (c)(2) allows immediate family members of County employees to contract with the County in certain circumstances and if the following criteria are met. Please confirm that you and your immediate family member/s will be able to meet 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 participated in determining your contract requirements.
3. The County employee will not participated 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

10/6/08  
Date



## ethics opinion for county employee

From: **Louis Sparks** (lexvol@msn.com)  
Sent: Wed 9/17/08 3:11 PM  
To: rmeyers@miamidade.gov

I am writing this email to humbly request an ethics opinion on my situation. My name is Louis E. Sparks and I am an employee of Miami Dade County. I currently work as a Fire Fighter for Miami Dade County Fire Rescue Department.

My wife, Pervanche Leon Sparks is the one hundred percent owner of a small business servicing snack and beverage vending machines. She is seeking to do become an approved vendor and do business with Miami Dade County.

I am asking for this opinion before she submits her application to become an approved vendor. Your assistance in this matter is greatly appreciated.

You can use the email address above or reach me at (786) 487-5600. My mailing address is 20530 NW 9th Place, Miami, Florida 33169. Thank you in advance.

Sincerely,  
Louis E. Sparks, II

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