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July 21, 2009

John G. Sanchez, President  
JGS Properties, Inc., d/b/a National Title and Abstract Co.  
428 SW 27<sup>th</sup> Road  
Miami, FL 33129

Via First Class Mail and email at [JGSM3621@aol.com](mailto:JGSM3621@aol.com)

Re: INQ 09-117 County Vendor Application

Dear Mr. Sanchez:

This letter is to confirm that you do not need permission from the Miami-Dade County Commission on Ethics to become a pre-approved County vendor as long as *none of your immediate family members is employed by Miami-Dade County.*

We understand that as President of JGS PROPERTIES, INC., d/b/a NATIONAL TITLE AND ABSTRACT CO., you want to register your company as a County vendor. Your sister, Socorro Sanchez, is employed by the Miami-Dade County Department of Environmental Resources (DERM) as a Secretary. Ms. Sanchez also serves as an officer of JGS PROPERTIES, INC.

As we discussed, "sister" does not fall within the County definition of immediate family member. Under County Code 2-11.1 (b)(9), "immediate family" is defined as "spouse, parents, and children" only.

You are advised, however, that your contract with the County should not interfere with the full and faithful discharge of your sister's duties to the County. Additionally, an appearance of impropriety might occur if she were to participate in determining or awarding your contract or become involved in any aspect of the contract, including its enforcement, oversight, administration, amendment, extension, termination, or forbearance.

If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

  
VICTORIA FRIGO  
Staff Attorney