



May 11, 2009

**ETHICS COMMISSIONERS**

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ADVOCATE

ARDYTH WALKER  
STAFF GENERAL COUNSEL

Willie Harris, President  
PERSONAL ATTENTION 2 DETAIL, INC.  
10930 NW 14<sup>th</sup> Ave., Suite A-46  
Miami, FL 33167

Via First Class Mail and Fax at 305 759-9955

**Re: INQ 09-69 Registering as a County Vendor**

Dear Mr. Harris:

In correspondence to our office on May 8, 2009, you said that you wish to register your company, PERSONAL ATTENTION 2 DETAIL, INC., as a County vendor.

The facts as we understand them are as follows:

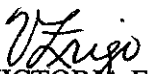
- You are employed by the Miami-Dade County Corrections & Rehabilitation Department as a **Food Service Manager**.
- PERSONAL ATTENTION 2 DETAIL, INC., is a business owned by you and in which you serve as President.
- PERSONAL ATTENTION 2 DETAIL, INC., is in the **catering business**.

It is the opinion of the Ethics Commission staff that PERSONAL ATTENTION 2 DETAIL, INC., may register to contract with the County as long as any contract does not interfere with the full and faithful discharge of your duties to the County. This includes the condition that you will not participate in determining the contract requirements or in awarding the contract. Additionally, none of your responsibilities will require you to be involved in the contract in any way including, but not limited to, its enforcement, oversight, administration, amendment, extension, termination, or forbearance. Finally, you may not be employed by any County department or agency that will enforce, oversee, or administer the contract. Therefore, as long as you are employed by the Miami-Dade County Corrections & Rehabilitation Department, your company may not contract with the Miami-Dade County Corrections & Rehabilitation Department.

**We draw special attention to the fact that your work as a vendor is virtually identical to the work you do for the County. At a minimum, this overlap could lead to appearances of impropriety.** Consequently, in addition to the limitations cited above, you must be especially mindful not to engage in outside employment while on the County's clock or by using County resources. Attached is Administrative Order 7-1 that outlines your duties to the County when engaged in outside employment.

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