



ING 09-179

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ARDYTH WALKER
STAFF GENERAL COUNSEL

November 5, 2009

Millie A. Ruiz
Office of the Mayor
Stephen P. Clark Center
111 N.W. 1st Street
Miami, FL 33128

Dear Ms. Ruiz:

Thank you for your fax dated November 2, 2009 wherein you request an opinion concerning your outside employment activities. You advised me in your correspondence that you are employed with the Office of the Mayor as the director of Constituent Services and you have formed a corporation, MGN and Partners. The corporation's purpose is to assist individuals who may wish to do business in Panama. You indicate in your request that you are the president of the corporation and expect to work no more than fifteen hours per week for the corporation. You wish to know whether such outside employment would be in violation of the county's Conflict of Interest and Code of Ethics Ordinance.

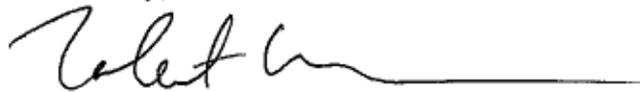
The role of the Ethics Commission is to determine whether an employee's outside employment conflicts with his/her County employment. Based on the information that you have provided me, the corporation you have established to help those who want to do business in Panama does not appear to conflict with your County duties.

Please be mindful of some of the restrictions that exist concerning your outside employment. You must not use County resources or your position in the Mayor's office to further or benefit your outside employment. This means, in part, that the use of County letterhead for your private business affairs is strictly prohibited and when interacting with the public in connection with your official duties, you should never mention your private company.

Furthermore, any request for outside employment must be approved by an employee's department director. In your case, the County Mayor or the Mayor's designee must approve your request for outside employment and it must be approved on an annual basis. Secondly, any income you derive from your outside employment must be reported by July 1st of the year following the year in which the income was earned and the form should be filed with the Supervisor of Elections.

If you have any additional questions or wish to discuss the above, please contact me at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Meyers", followed by a horizontal line extending to the right.

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



MEMORANDUM
OFFICE OF THE MAYOR

TO: MR. Robert MEYERS

DATE: November 2, 2009

FROM: Millie A. Ruiz

SUBJECT: Requesting a legal opinion.

FAX 305 579-0273

Dear MR. MEYERS.

I AM Requesting a legal opinion FROM your office AS to the opening of a CORPORATION.

The Purpose OF THE CORPORATION IS FOR INDIVIDUALS THAT WANT TO DO BUSINESS IN PANAMA.

I AM CURRENTLY THE DIRECTOR OF CONSTITUENT SERVICES FOR THE OFFICE OF THE MAYOR AND I AM submitting an outside Employment REQUEST.

I AM LISTED AS THE President OF THE CORPORATION AND I INTEND TO WORK NO MORE THAT 15 HOURS A WEEK.

THE NAME OF THE CORPORATION IS: MGN AND PARTNERS CORP.

ATTACHED IS A COPY OF MY BUSINESS CARD.

MY OFFICE NUMBER IS 305 375-5062.

Sincerely.

Millie A. Ruiz

Millie Garcia Navarro

MCN & Partners, Corp.

For Business & Investors with Interest In Panama
PANAMA • USA • PANAMA • USA • PANAMA • USA • PANAMA • USA • PANAMA

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