

Meyers, Robert (COE)

JNO 10-180

From: Meyers, Robert (COE)
Sent: Tuesday, November 02, 2010 10:09 AM
To: 'ALLISON DIEGO'
Subject: RE: Opinion

Allison:

Thank you for supplying this information in writing. As I understand the facts, you are investing \$2,000 in your live-in boyfriend's business and you are listed as the company's president, but you play no role whatsoever in the operation of the company. You wish to know whether your position as a corporate officer and your investment in the company triggers the filing of outside employment forms and/or requires you to list the company in your financial disclosure filings – I am assuming that you are required to file a financial disclosure form. You also inquire about investing in another company, Restoration Property Group, LLC – a firm that your boyfriend works for from time-to-time.

Investing in a company is not outside employment unless you play an active role in the company activities. Moreover, being identified as a corporate officer is not outside employment, either. Since you are not engaged in outside employment, you do not need permission from your department director to engage in these activities. Regarding the financial disclosure questions about Ecocentric Partners, LLC, the company would have to provide you with a major source of income for it to necessitate disclosure. Based on the facts that you have provided, it does not appear that such a disclosure would be necessary. In the case of any investment with Restorations Property Group, the same analysis applies. It does not appear at the present time that your investment would reach the threshold to cause you to list it on your financial disclosure form.

If you have any further questions, please do not hesitate to contact me.

Sincerely,

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

From: ALLISON DIEGO [mailto:adiago@bellsouth.net]
Sent: Wednesday, October 27, 2010 2:22 PM
To: Meyers, Robert (COE)
Subject: Opinion

Good afternoon.

As we discussed, I created a company called Ecocentric Partners, LLC for my boyfriend (whom I live with). It is a home-based business providing construction, renovation and hauling debris services. I funded the start up costs (\$2,000) for the business but do not provide any other support (other than minimal help when he needs it to print flyers, business cards, etc from our home computer and printer). Since I am listed as the President of the company but do not receive any fiscal distributions (other than getting paid back my original investment at some point in time), do I need to disclose for any record (financial disclosure, outside employment, etc.)? Additionally, he does some work for a group of investors who own Restorations Property Group, LLC that buys foreclosures, renovates them and then sells for a profit (the GC on record for some of these projects may be Ecocentric). I would like to invest (via a self-directed IRA) in Restorations Property Group to grow my retirement fund. Again, do I need to disclose anything?

11/2/2010

I understand (and have explained to my boyfriend) the potential conflict of interest regarding doing any business with Miami-Dade County so he **will not** be bidding on any Miami-Dade County projects while I'm employed with Miami-Dade County.

Thank you for your guidance.

Allison Diego
305-898-8103

11/2/2010