## Frigo, Victoria (COE)

From:Frigo, Victoria (COE)Sent:Tuesday, July 05, 2011 4:15 PMTo:Adebisi, Halimah (ASD)Subject:INQ 11-108 Adebisi

### Ms. Adebisi,

This is in response to your question about whether the County Ethics Code prevents a business associate of yours from entering into a contract <u>independently and on her own behalf</u> with a County vendor. In brief, the business arrangement, as you described it, is not prohibited.

The facts as we understand them are as follows:

- 1. You are the Budget and Finance Supervisor for the County's Animal Services Department.
- 2. You and Temitope Odumuyiwa are partners in a private company registered in Florida as Crown Commodities LLP.
- Temitope Odumuyiwa, in her private capacity and not in association with Crown Commodities LLP, has been offered a job to do the payroll for the staff of Total Connection, Inc.
- 4. Total Connection, Inc., is a County vendor owned by Joseph Orukotan that, among other services, provides cleaning supplies to the Animal Services Department.
- 5. In your capacity as Budget and Finance Supervisor, you approve invoices for products provided to the Animal Services Department by Total Connection, Inc.

Although the County Ethics Code does not bar Ms. Odumuyiwa from entering into a contract with Total Connection, Inc., the Ethics Code contains several relevant restrictions for County employees. These include, but are not limited to, the prohibitions that County employees not exploit their official positions to benefit themselves or others and not disclose confidential information acquired by reason of their official positions. See the County Code at Secs. 2-11.1 (g) and(h).

Thank you for clarifying this business relationship and allowing us to provide you with an ethics opinion.

#### Sincerely,

VICTORIA FRIGO, STAFF ATTORNEY MIAMI-DADE COUNTY COMMISSION ON ETHICS DIRECT PHONE: 305 350-0601 FAX: 305 579-0273

miamidade.gov 7

#### 19 West Flagler St., Suite 820 Miami, FL 33130

Miami-Dade County is a public entity subject to Chapter 119 of the Florida Statutes concerning public records. *E-mail messages are covered under such laws and thus subject to disclosure.* 

#### From: Adebisi, Halimah (ASD)

Sent: Tuesday, July 05, 2011 10:49 AM To: Frigo, Victoria (COE) Subject: Re: Requesting Opinion

The name of the vendor is Total Connection. Thanks

Halimah Oluyemisi Adebisi Budget and Finance Supervisor 305-805-1779

From: Frigo, Victoria (COE)
Sent: Tuesday, July 05, 2011 10:45 AM
To: Adebisi, Halimah (ASD)
Subject: RE: Requesting Opinion

Hello Halimah, Could you please advise us of the name of the county vendor? Thank you,

VICTORIA FRIGO, STAFF ATTORNEY MIAMI-DADE COUNTY COMMISSION ON ETHICS DIRECT PHONE: 305 350-0601 FAX: 305 579-0273

# miamidade.cov\*

19 West Flagler St., Suite 820 Miami, FL 33130

Miami-Dade County is a public entity subject to Chapter 119 of the Florida Statutes concerning public records. E-mail messages are covered under such laws and thus subject to disclosure.

From: Adebisi, Halimah (ASD) Sent: Tuesday, July 05, 2011 10:43 AM To: Frigo, Victoria (COE) Subject: Requesting Opnions

Good Morning Victoria...as discussed, My name is Halimah Adebisi, I am an Accountant 3 with Miami-Dade County Animal Services Department. I have a Limited Liability Partnership with a friend...the name of the business is Crown Commodities LLP. My partner just got an offer to be doing payroll with one of the County Vendor/Contractor. Please I will like to know if this is ok? Thanks so for much for your taking your time to talk to me this morning.

#### Halímah Oluyemísí Adebísí

Budget and Finance ~Supervisor Miami-Dade County Animal Services Department 7401 NW 74 Street Miami, Florida 33166 Phone: 305-805-1779 Fax: 305-805-1591 www.miamidade.gov/animals



### "Delivering Excellence Every day"

Miami-Dade County is a public entity subject to Chapter 119 of the Florida Statues concerning public records. E-mail messages are covered under such laws and thus subject to disclosure. All e-mail sent and received are captured by our servers and kept as a public record

