



Via First Class Mail
and email at jjgreen@miamidade.gov

July 24, 2012

ETHICS COMMISSIONERS

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MIRIAM S. RAMOS
DEPUTY GENERAL COUNSEL

Joyce Johnson Green, President
Sparkles Maintenance of Tri-County, Inc.
P. O. BOX 170982
Hialeah, FL 33017

Re: INQ 12-125, Mom & Pop Grant

Dear Ms. Green:

You asked if the County Ethics Code would prevent your privately owned company, Sparkles Maintenance of Tri-County, Inc., from accepting a Mom & Pop Grant funded through Commissioner Esteban L. Bovo Jr.'s District 13 Office. You are employed by the Miami-Dade County Transit Department as a 311 Transit Agent.

Briefly, your company may **accept a grant** as long as the Transit Department is not involved in any way in processing or administering the grant. You **may not lobby for the grant**. (See the County Ethics Code at Secs. 2-11.1 (c) and (m)(1).)

Be advised that the County Ethics Commission has interpreted lobbying very expansively when applied to County employees. This means that you may not contact anyone within the County (or anyone working on behalf of the County, including Hialeah Dade Development) in an attempt to influence his/her decision about the grant you are seeking.

This opinion construes the Miami-Dade Conflict of Interest and Code of Ethics Ordinance only and is not applicable to any conflict under state law. Inquiries regarding possible conflicts under state law should be directed to the State of Florida Commission on Ethics.

Please feel free to contact me if I can be of further assistance.

Sincerely,

VICTORIA FRIGO
Staff Attorney

Copies: Mario Arus, Executive Director
Hialeah Dade Development, Inc.
501 Palm Avenue
Hialeah, FL 33010

Commissioner Esteban L. Bovo Jr.
Stephen P. Clark Center, Suite 320
Miami, FL 33128