



Via First Class Mail

ETHICS COMMISSIONERS

January 24, 2012

Dawn Addy, CHAIR
Charlton Copeland, VICE CHAIR
Nelson Bellido
Judge Seymour Gelber
Kerry E. Rosenthal

Gabriel Watson, Manager
Uniform Depot of South Florida, LLC
13237 NW 7th Ave.
North Miami, FL 33109

ROBERT A. MEYERS
EXECUTIVE DIRECTOR

Re: INQ 12-15, Mom & Pop Grant

MICHAEL P. MURAWSKI
ADVOCATE

Dear Mr. Watson:

ARDYTH WALKER
STAFF GENERAL COUNSEL

You asked if the County Ethics Code would prevent your privately owned company, Uniform Depot of South Florida, LLC, from accepting a Mom & Pop Grant provided through Commissioner Jean Monestime's District 2 Office in light of your employment with the Miami-Dade County Park & Recreation Department.

Briefly, your company may accept a grant as long as the Park & Recreation Department is not involved in any way in processing or administering the grant. See the County Ethics Code at Sec. 2-11.1 (c).

Be advised, however, that **you may not seek this benefit personally by making a presentation or appearing before any County department or board**, including Commissioner Monestime, his staff or anyone or any entity he has designated to process or administer the grant. See the County Ethics Code at Sec. 2-11.1 (m)(1). The County Ethics Commission has interpreted this section of the Code very expansively to prohibit any communications, in any form, intended to influence an individual within the County (or anyone working on behalf of the County) to take an official action.

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

Copy: Leroy Jones, Executive Director
Neighbors & Neighbors Association, Inc.
180 NW 62nd St.
Miami, FL 33150