



Via First Class Mail and
email at nylarain@yahoo.com

ETHICS COMMISSIONERS

December 13, 2012

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

Aretha Reed
Nylarain Cleaning Services, LLC
775 SW 7th Court
Florida City, FL 33034

JOSEPH CENTORINO
EXECUTIVE DIRECTOR
GENERAL COUNSEL

Re: INQ 12-223, Limitations on Doing Business with the County

Dear Ms. Reed:

MICHAEL P. MURAWSKI
ADVOCATE

On December 13, 2012, you asked about limitations in doing business with the County through your privately owned company, Nylarain Cleaning Services, LLC. You are employed as a Correctional Officer with the Miami-Dade County Corrections & Rehabilitation Department.

MIRIAM S. RAMOS
DEPUTY GENERAL COUNSEL

The County Ethics Code at Sec. 2-11.1 (c)(2) allows your company to enter into a contract with Miami-Dade County as long as the contract does not interfere with the full and faithful discharge of your duties to the County. This includes the condition that you do not participate in determining the contract requirements or in awarding the contract. Additionally, none of your job responsibilities and job descriptions may require you to be involved in the contract in any way including, but not limited to, its enforcement, oversight, administration, amendment, extension, termination or forbearance. Finally, you may not work in any County department that will enforce, oversee or administer your contract. In your case, this means that Nylarain Cleaning Services, LLC, may not enter into contracts with the Miami-Dade County Corrections & Rehabilitation Department.

This letter does not grant you permission to engage in outside employment. You must obtain permission to engage in outside employment annually from your department director and file related financial disclosure forms every year.

Additionally, you may not lobby for the contract. This means that you may not contact anyone within the County in an attempt to influence his/her decision about the contract you are seeking. (See the County Ethics Code at Sec. 2-11.1 (m)(1).)

This opinion construes the Miami-Dade County Ethics Code as it applies to County employee-vendors at Secs. 2-11.1 (c)(1) and (m)(1) only. It is not applicable to any conflicts under other sections of the County Code or to issues related to state or federal laws.

If any of the facts you have presented change or if you have further questions, please feel free to contact me at 305 350-0601.

Sincerely,

VICTORIA FRIGO
Staff Attorney