

**Cedeno, Rachelle (COE)**

FINQ 12-55

**From:** Centorino, Joseph (COE)  
**Sent:** Tuesday, March 27, 2012 6:02 PM  
**To:** Cedeno, Rachelle (COE)  
**Subject:** FW: INQ for Mayor Gimenez

Rachelle,  
 Please file this as an INQ. Thanks.

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**From:** Centorino, Joseph (COE)  
**Sent:** Tuesday, March 27, 2012 6:02 PM  
**To:** Kim, Inson (Office of the Mayor)  
**Subject:** INQ for Mayor Gimenez

Ms. Kim:

Mayor Gimenez has asked if he has any ethics conflicts related to the Lincoln-Marti Charter Schools based on his sister-in-law's part-time employment at the Lincoln-Marti Charter Schools. It is our understanding that the Mayor's sister-in-law has no connection to the charter schools' Head Start or Early Head Start programs that might receive funding through County grants.

Based on these facts, the Lincoln-Marti Charter Schools are not prohibited from doing business with the County, and the Mayor has no conflict under the County Ethics Code to take official action regarding the Lincoln-Marti Charter Schools.

The County Ethics Code does not include "sister-in-law" within the definition of "immediate family." The County Code at Sec. 2-11.1(b)(9) defines "immediate family" as spouse, domestic partner, parents, stepparents, children and stepchildren.

Consequently, the prohibition that an immediate family member may not do business with the County does not apply in this case. See County Code at Sec. 2-11.1(c)(1).

Furthermore, the Mayor may take official action that affects the Lincoln-Marti Charter Schools as long as he (or his immediate family) has no financial interest in the schools. See County Code at 2-11.1(n). The financial interest of his sister-in-law in the schools is, again, not relevant since she is not considered an immediate family member.

It should be noted, however, that the Miami-Dade County Ethics Code represents a minimal standard of conduct for those in government service. Public officials should carefully consider all the circumstances before taking a particular action in order to maintain the public's trust.

JOSEPH CENTORINO  
 Executive Director, Miami-Dade Commission on Ethics and Public Trust

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**From:** Kim, Inson (Office of the Mayor)  
**Sent:** Thursday, March 22, 2012 3:07 PM  
**To:** Centorino, Joseph (COE)  
**Subject:** Our conversation this morning

As a follow-up to our conversation this morning, the Mayor's sister-in-law, Maria Teresa Rojas, is

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employed as a part-time supervisor with Lincoln-Martí Charter Schools. This company, along with other similarly named, operates numerous charter schools in Miami-Dade County. In addition to charter schools, they also operate daycare centers throughout Miami-Dade County. Currently her job duties deal only with charter schools. She does not have any role in the Head Start or Early Head Start programs.

Miami-Dade County through the Community Action and Human Services Department currently has two solicitations - Request for Expressions of Interest (REI) and Request for Applications (RFA) – for Head Start and Early Head Start providers that are in process. Lincoln-Martí does not currently have a contract with the County for Head Start or Early Head Start. I've been advised that Lincoln-Martí has submitted a proposal. We would appreciate your guidance as to whether the Mayor needs to recuse himself from these solicitations.

If you need any additional information please do not hesitate to call me.

Thank you,  
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Inson Kim  
Director of Policy & Legislative Affairs  
Office of the Mayor  
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