

## Frigo, Victoria (COE)

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**From:** Frigo, Victoria (COE)  
**Sent:** Tuesday, May 01, 2012 4:32 PM  
**To:** Mazzorana, Shanda (ITD)  
**Cc:** Manduley, Julian R. (ITD); Hire Miller, Arletha (ITD); Centorino, Joseph (COE)  
**Subject:** Data Industries Contract Worker (INQ 12-80)

Ms. Mazzorana,

In response to your question below, nothing in the Ethics Code prevents a former contract worker with Data Industries, Inc., from continuing to provide services to ITD by accepting new employment with another County contractor, Think Forward Consulting, Inc.

We understand that you are trying to ensure the integrity of your processes in light of the recent investigation into alleged criminal practices by Data Industries, Inc., that has resulted in the suspension of Data Industries' contract with ITD.

The former Data Industries contract worker may accept new employment with Think Forward as long as those involved have not exploited their positions with the County to obtain special benefits for themselves or others. Exploitation can take many forms, but often an individual obtains an unfair advantage through his/her position in the County or through access to confidential County information that results in illicit personal or private gain. *See* Sec. 2-11.1 (g) of the County Ethics Code.

Absent signs of exploitation, the presence of William G. Santiago, the president of Think Forward Consulting, Inc., and one of Think Forward's employees at ITD in fulfillment of Think Forward's contract does not affect this opinion.

Sincerely,

**VICTORIA FRIGO, STAFF ATTORNEY**

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**From:** Mazzorana, Shanda (ITD)  
**Sent:** Tuesday, May 01, 2012 9:54 AM  
**To:** Frigo, Victoria (COE)  
**Cc:** Manduley, Julian R. (ITD); Hire Miller, Arletha (ITD)  
**Subject:** Inquire Concerning Conflict of Interest in Contracting Services

This is a follow-up to our phone conversation yesterday concerning Think Forward Consulting, Inc., a registered vendor on the IT Consulting Contract # 9241-0/15-A, with Miami-Dade County. The President/CEO of this company, William G. Santiago, is currently working here as a contractor along with one of his employees. We want to ensure that there is no conflict of interest with Mr. Santiago and others being selected by ITD for placement through his firm. As discussed, Julian Manduley advised that there is no procurement or contractual limitation to this arrangement.