

Frigo, Victoria (COE)

From: Ramos, Miriam S. (COE)
Sent: Tuesday, March 12, 2013 9:48 AM
To: 'Jim Loftus'
Cc: Frigo, Victoria (COE)
Subject: Ethics Opinion - INQ 13-60

Good morning Jim,

During our conversation you explained that you are Senior Vice President of Security Alliance, a company that has an existing contract with Miami-Dade County. You are also a former Miami-Dade County department director. Your question relates to whether your current position presents any conflicts in light of the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance (the Code).

Nothing in Code prohibits you from holding your current position with Security Alliance. For two years beginning the day when you retired from Miami-Dade County, however, you are barred from lobbying “any County officer, department personnel or employee in connection with any judicial or other proceeding, application, RFP, RFQ, bid, request for ruling or other determination, contract, claim, controversy, charge, accusation, arrest or other particular subject matter in which Miami-Dade County or one of its agencies or instrumentalities is a party or has any interest whatever, whether direct or indirect.” Section 2-11.1(q)(1), Miami-Dade County Code. Extra caution should be taken not to run afoul of this section if Security Alliance’s contract with the County comes up for renewal within the two year period. You, personally, are disallowed from interacting with County personnel regarding the renewal of the contract. Please note, that Section (q)(1) does not “prohibit any individual...from submitting a routine administrative request or application to a County department or agency during the two year period...”

If you have any questions or would like to discuss further, please to do hesitate to contact me directly.

Best,

Miriam S. Ramos, Esq.
Deputy General Counsel

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From: Jim Loftus [<mailto:jiml@securityalliancegroup.com>]

Sent: Monday, March 11, 2013 4:05 PM

To: Ramos, Miriam S. (COE)

Subject: Question on Conflicts

Miriam, thanks for setting me straight on the conflict issue this morning. I'm determined not to run afoul of the rule. To that end, if you could formalize your thoughts on the potential for conflict for a person in my position, I would really appreciate it. Thank you, Jim.

James (Jim) Loftus

Vice President | Security Alliance

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