

## Diaz-Greco, Gilma M. (COE)

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Friday, March 21, 2014 8:39 AM  
**To:** 'Gerri Lazzarre'  
**Subject:** RE: Limitations on Doing Business with the County INQ- 14-64  
**Attachments:** INQ 14-64 Lazzarre.pdf

Ms. Lazzarre,

Here is the amended letter that reflects your position at BAAB as Vice-Chair.

Have a great weekend.

Gilma (Mimi) Diaz-Greco  
Staff Attorney



Miami-Dade Commission on Ethics and Public Trust  
19 W. Flagler Street, Suite 820  
Miami, FL 33130  
Tel: (305) 579-2594  
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**From:** Gerri Lazzarre [mailto:GLazzarre@TrimergeCPA.com]  
**Sent:** Thursday, March 20, 2014 5:20 PM  
**To:** Diaz-Greco, Gilma M. (COE)  
**Subject:** RE: Limitations on Doing Business with the County INQ- 14-64

Thank you for the follow up.

Yes, it is Vice-Chair, officers were installed last month, it looks like staff hasn't had a chance to change yet.

Yes, please change. Thank you and have a great weekend.



Gerri Lazarre, CPA, MsTax

ACCOUNTING - AUDIT - TAX SERVICES

1444 Biscayne Blvd., Suite #115-21  
Miami, Florida 33132

39 NW 166 Street, Suite #1  
Miami, Florida 33169

305-940-5344 Office Miami Dade  
754-333-1099 Office Broward  
305-940-5223 Fax

[www.TriMergeCPA.com](http://www.TriMergeCPA.com)  
[www.TriMergeTax.com](http://www.TriMergeTax.com)

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**From:** Diaz-Greco, Gilma M. (COE) [<mailto:GDIAZGR@miamidade.gov>]

**Sent:** Thursday, March 20, 2014 3:08 PM

**To:** Gerri Lazarre

**Subject:** FW: Limitations on Doing Business with the County INQ- 14-64

Dear Ms. Lazarre:

My apologies. Your current position with BAAB is that of Vice-Chair. I used the information on the website which still lists you as Secretary. I would be happy to change the letter I just sent you to reflect your current position. Let me know if you would prefer that.

Best regards,

Gilma (Mimi) Diaz-Greco  
Staff Attorney



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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Thursday, March 20, 2014 3:02 PM  
**To:** Gerri Lazarre ([GLazarre@TrimergeCPA.com](mailto:GLazarre@TrimergeCPA.com))  
**Cc:** Centorino, Joseph (COE)  
**Subject:** Limitations on Doing Business with the County INQ- 14-64

Dear Ms. Lazarre:

Attached is the Limitations on Doing Business with the County Ethics Opinion letter. Please note that it indicates that your board service with the Miami-Dade Black Affairs Advisory Board (BAAB) does not prohibit you from entering into a contract with the County as long as BAAB has no oversight over your county contract(s). I will send you the original letter via regular mail.

Please do not hesitate to contact me if you have further questions.

Sincerely,

Gilma (Mimi) Diaz-Greco  
Staff Attorney



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# MIAMI-DADE COMMISSION ON ETHICS AND PUBLIC TRUST

## COMMISSIONERS

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Dawn Addy  
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Judge Lawrence Schwartz



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Joseph M. Centorino  
EXECUTIVE DIRECTOR  
GENERAL COUNSEL  
Michael P. Murawski  
ADVOCATE  
Miriam S. Ramos  
DEPUTY GENERAL COUNSEL

email at: [glazarre@trimergecpa.com](mailto:glazarre@trimergecpa.com)

May 2, 2014

Geraldine Lazarre  
GLOMIAMI, Inc.  
39 NW 166 Street, Suite # 1  
Miami, FL 33169

*Please submit this letter to the  
Procurement Management Services  
Division with your County Board  
Members Wishing to Register as  
County Vendors' application. The Ethics  
Commission does not submit this letter  
on your behalf.*

Re: INQ 14-113, Limitations on Doing Business with the County

Dear Ms. Lazarre:

You serve on the Miami Dade Black Affairs Advisory Board (BAAB) as Vice-Chair. BAAB's mission statement states that it "exists to advocate for the social, economic and educational needs of the diverse Black World Community in Miami-Dade County." It does not fund any County departments or agencies.

On April 17, 2014, you asked about limitations in doing business with the County through your privately owned company, GLOMIAMI, INC. GLOMIAMI's business involves the areas of restaurant, retail and concession.

Your board service with BAAB does not preclude you with contracting with the County as long as BAAB has no oversight over your County contracts.

The County Ethics Code at Sec. 2-11.1 (c)(3) prohibits a County board member from entering into a contract with the County if the board on which she serves would oversee the contract. Further, Sec. 2-11.1(m)(2) prohibits a County board member from making presentations or seeking any benefits for herself or others from the board on which she serves. Sec. 2-11.1(v) is also relevant. It prohibits a County board member from voting on a matter if she would be directly affected by the vote and she has an enumerated relationship with the entity before the board.

Based on the facts you presented, you would not have a prohibited conflict of interest because BAAB would not be involved in any aspect of the contracts your firm enters into with the County,

This opinion construes the Miami-Dade Conflict of Interest Ordinance only and is not applicable to any conflict under state law. Inquiries regarding possible conflicts under state law should be directed to the Florida Commission on Ethics.

If any of the facts you have presented change or if you have further questions, please feel free to contact me at 305 350-0638.

Sincerely,

A handwritten signature in black ink, appearing to read "Gilma Diaz-Greco". The signature is written in a cursive style with a large initial "G".

Gilma Diaz-Greco  
Staff Attorney

## County Board Members Wishing to Register as County Vendors

Please submit the following information by mail, fax, or email to-

Gilma Diaz-Greco, Staff Attorney

The Commission on Ethics and Public Trust

19 West Flagler ST., Suite 820

Miami, FL 33130

Phone: (305) 350-0638

Fax: (305) 579-0273

Email: [gdiagr@miamidade.gov](mailto:gdiagr@miamidade.gov)

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Board Member's Name Geraldine Lazare  
Board Name Miami Dade Black Affairs Advisory Board  
Board Member Title Vice Chair  
Type of Business GLOMIAM, INC. - Restaurant/retail concession  
Board Member's Mailing Address 39 NW 166 ST, Suite #1 Miami, FL 33169  
Board Member's email glazarre@TRImergzCPA.COM  
Do you have a controlling financial interest (10% or more) in a corporation, firm or entity that gerr@glomiami.com  
Is seeking to contract with the County? Yes  No

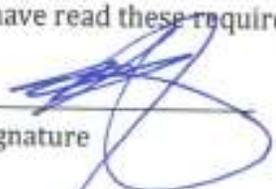
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The Miami-Dade County Conflict of Interest & Code of Ethics at Secs. 2-11.1 (c)(3) and (d) allows County Board Members who have a **controlling financial interest (10% or more)** in a corporation firm or entity to contract with the County in certain circumstances and if the following criteria are met. *See also* Secs. 2-11.1 (m)(2),(v).

Please confirm that you will meet all of these criteria:

1. I will not contract with any County agency or department subject to the regulation, oversight, management, policy-setting, or quasi-judicial authority of the board of which I am a member. *See* 2-11.1(c)(3) and (d).
2. I will not make a presentation or seek any benefits for myself or others from the board on which I serve. *See* 2-11.1(m)(2).
3. I will not vote on any matter if I will be directly affected by the vote and I have one of the enumerated relationships in Sec. 2-11.1(v) with the firm, corporation, or entity before the board.

I have read these requirements and pledge to abide by them.

Signature 

Date 4/17/2014

Your ethics opinion will be sent to by first class mail and email.

COE 4-11-14