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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Wednesday, November 12, 2014 3:40 PM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** Lynn Barrett, Chief Compliance Officer, JHS (Outside Employment) INQ 14-273

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**From:** Centorino, Joseph (COE)  
**Sent:** Wednesday, November 12, 2014 1:42 PM  
**To:** Diaz-Greco, Gilma M. (COE)  
**Subject:** INQ - Lynn Barrett, Chief Compliance Officer, JHS (Outside Employment)

Lynn Barrett, Chief Compliance Officer for Jackson Health Systems, inquired regarding a current parttime employee of JHS and whether that employee was subject to Section 2-11.1(j) (Conflicting Employment Prohibited) of the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance. That provision provides that, “No person included in the terms defined in Subsections (b)(1) through (6)a and (b)(13) shall accept other employment which would impair his or her independence of judgment in the performance of his or her public duties.” Section 2-11.1(b)(6) provides that the term, “employees” shall refer to **all other personnel** employed by the County.” (emphasis added). The latter section has previously been interpreted in COE opinions to refer to parttime employees of the County. Therefore, since JHS employees are considered to be County employees, parttime employees at JHS would likewise be included among the County personnel covered by the Code.

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