
From: Diaz-Greco, Gilma M. (COE)
Sent: Tuesday, August 18, 2015 4:28 PM
To: Sanchez, Rodzandra (COE)
Subject: FW: Ethics Opinion, Alice Bravo, Director, Miami-Dade Transit Department (limitations on contracting with the County) INQ 15-183

INQ 14-183 Bravo

From: Diaz-Greco, Gilma M. (COE)
Sent: Tuesday, August 18, 2015 4:21 PM
To: Bravo, Alice (MDT)
Cc: Centorino, Joseph (COE); Perez, Martha D. (COE)
Subject: Ethics Opinion, Alice Bravo, Director, Miami-Dade Transit Department (limitations on contracting with the County) INQ 15-183

Dear Ms. Bravo:

It was a pleasure speaking with you. You inquired about ethics issues related to your recent employment as the County's Director of the Miami-Dade Transit Department (Transit) and your spouse, Walfrido Pevida's employer, Stantec Consulting Engineering Corporation (Stantec).

As background, Stantec, is a publicly traded corporation that employs your spouse as a "Senior Principal." You state that Mr. Pevida's identification as a Senior Principal" does not indicate that he has an ownership interest in Stantec. Rather, you affirm that your spouse is a salaried employee with no ownership of stock in the company whatsoever.

Stantec serves as a subcontractor for a County vendor that contracts with the Transit Department. You advise that your husband is not involved in any County projects or work that Stantec performs in its role as a subcontractor.

The County Code only prohibits your spouse from contracting with the County if he has a controlling financial interest in the company. *See* County Code §§ 2-11.1 (c)(2) and (d). Section 2-11.1(b)(8) defines a controlling financial interest as ownership, directly or indirectly, of 10% or more of the outstanding capital stock.

Under the facts stated here, no conflicts of interest are created under the County Ethics Code. Your husband does not have an ownership interest in Stantec; Stantec does not contract directly with the Transit department, but rather serves a subcontractor to a vendor of the Transit Department; and your husband is not involved either directly or indirectly on any projects that involve the Transit department.

In an abundance of caution, we recommend that, in the event that there is a decision that would affect Stantec's financial interests, that you consider recusing yourself from that decision and delegating the decision making authority to another individual in your department.

Please contact us if you have any further questions.

Best regards.

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
Fax: (305) 579-0273
gdiazgr@miamidade.gov
www.facebook.com/MiamiDadeEthics

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