
From: Perez, Martha D. (COE)
Sent: Wednesday, August 19, 2015 9:52 AM
To: Roger, Malory (CAHSD)
Cc: Centorino, Joseph (COE); Diaz-Greco, Gilma M. (COE); Sanchez, Rodzandra (COE)
Subject: Malory Roger, Acting Fiscal Administrator MDC Head Start/Early Head Start (2-year rule), INQ 15- 184
Attachments: RQO 12-09 Carreno.pdf

Good morning Ms. Roger,

You inquired whether you may do contractual work with County vendors upon your separation from County employment.

As background, you are the Acting Fiscal Administrator for Miami- Dade County's Head Start/ Early Head Start . You will be separating from County employment on Friday. As part of your personal business, you wish to perform contractual work with County vendors/ delegate agencies. Specifically, you would be assisting these vendors with fiscal administration and training responsibilities. You will not be lobbying on behalf of yourself or an employer.

Section 2-11.1(q) of the County's Ethics Code prohibits a former County employee from lobbying the County for two years after his or her County service. The Ethics Code would not prohibit a former employee from working for a County vendor or becoming a County vendor herself. However, the employee would be prohibited from lobbying for the contract either on behalf of an employer or herself for two years after her separation from County employment.

Also, be aware that Section 2-11.1(h) of the County's Ethics Code prohibits employees from disclosing confidential information acquired by reason of an employee's official position with the County, or from using such information directly or indirectly for his or her personal gain or benefit.

I am attaching RQO 12-09 which addresses the issue of post-employment restrictions.

This opinion is based on the facts presented. If these facts change, kindly contact us.

Sincerely,

Martha D. Perez
Staff Attorney
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From: Ethics (COE)
Sent: Tuesday, August 18, 2015 2:45 PM
To: Perez, Martha D. (COE)
Subject: FW: Allowed or not?

Please handle this 2-year rule inquiry as an INQ. Thanks.

From: Roger, Malory (CAHSD)
Sent: Tuesday, August 18, 2015 2:39 PM
To: Ethics (COE)
Cc: msgaillard03@yahoo.com
Subject: Allowed or not?

Ethics,

I am currently a Miami-Dade County employee who's last day with the County will be next week Friday. I have a question pertaining to Ethics. There are County vendors that I will like to do contractual work with once I depart from the County. The work will be done under my personal business. Is this allowable for me to do after I depart from the County? My supervisor stated that I would not be able to do any contractual work for 2 years with any county vendors. Is that true? It is not stated anywhere on the 2-year rule on the website and I will not be lobbying.

Current situation: In my duty of work now I manage the Head Start and Early Head Start grant fiscally. We do business with delegate agencies. Since I have announced my departure, a few of the agencies are wanting to do contractual work so that I can assist them with their financial books and conduct trainings for fiscal staff, however, this will be after my departure from the county, under my own business and if allowed by Ethics. Please advise.

Thanks,

Malory Roger, MBA, MFA
Acting Head Start/Early Head Start Fiscal Administrator-SPA 2
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