
From: Diaz-Greco, Gilma M. (COE)
Sent: Tuesday, April 28, 2015 11:42 AM
To: Sanchez, Rodzandra (COE)
Subject: FW: Evelyn Campos, Division Director, Professional Compliance Division, MIA (outside employment) INQ 15- 77

INQ 15-77 Campos

From: Diaz-Greco, Gilma M. (COE)
Sent: Tuesday, April 28, 2015 11:41 AM
To: Campos, Evelyn (Aviation) (ECampos@miami-airport.com)
Cc: Centorino, Joseph (COE)
Subject: FW: Evelyn Campos, Division Director, Professional Compliance Division, MIA (outside employment) INQ 15- 77 final

Dear Ms. Campos:

You have inquired whether a conflict of interest would exist where Lauraine B. Murray, an employee of the Miami-Dade County Aviation Department (MIA) has requested permission to engage in outside employment as an adjunct professor teaching aviation courses for Miami Dade College's School of Aviation located at MIA.

As background, Ms. Murray is employed by MIA as a Property Manager. Her job responsibilities include overseeing non-terminal leases, such as those at MIA's Cargo buildings. Ms. Murray is part of a team of non-terminal property managers all of whom may be called to negotiate or service a lease in non-terminal buildings.

She is seeking to engage in outside employment with Miami Dade College's School of Aviation which maintains a lease with the Airport and holds classes in MIA's Cargo building 701, one of the buildings under the oversight of the non-terminal property management team.

I have discussed this matter with our Executive Director, and we agree that Ms. Murray's proposed outside employment with Miami Dade College's School of Aviation, an MIA leaseholder, would create a conflict of interest for her because the County division that employs her manages Miami Dade College's lease. See INQ 12-155 (A County employee with the Aviation Dept. cannot accept outside employment with an Aviation concessionaire because the County division that employs her manages concessionaire contracts), and INQ 12-221 (The County Ethics Code prohibits airport employees from engaging in outside employment with entities that the County employees monitor in their County positions.)

The Ethics Code at Sec. 2-11.1 (j) states that a County employee may not accept outside employment that impairs her independence of judgment in the performance of her public duties. The Ethics Commission has issued numerous opinions on this subject. See, specifically, RQO 99-50, where an Airport employee was not allowed to engage in outside employment with an Airport contractor. The Ethics Commission reasoned that the outside employment might improperly affect the Airport employee's relationships with his County coworkers and might induce him to use confidential information to benefit his private employer.

In this instance, the conflict is created because the non-terminal property management division deals directly with non-terminal leaseholders, such as Miami Dade College, as part of managing rental and permit agreements of Airport properties and facilities. An Airport employee's part-time work with an Airport leaseholder could create opportunities to benefit the leaseholder to the detriment of the County and would likely create conflicting loyalties which would affect the employee's independence of judgement in the performance of their his or her public duties.

In addition, the County's Administrative Order AO 7-1 reiterates the general principle that County employees must conduct the public's business without even an appearance of conflicting loyalties. It states that "Under no circumstances shall a County employee accept outside employment ... where a real or apparent conflict of interest with one's official or public duties is possible."

Our office is aware that employees may seek outside employment in order to earn additional income or address economic hardships. We encourage Aviation County employees to seek outside employment with entities that have no relationship with the County Airport.

If you have additional questions, please do not hesitate to contact me.

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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From: Campos, Evelyn (Aviation) [<mailto:ECampos@miami-airport.com>]
Sent: Monday, April 13, 2015 3:37 PM
To: Diaz-Greco, Gilma M. (COE)
Cc: Wilson, Jason (Aviation); Jimenez, Barbara S. (Aviation)
Subject: RE: Opinion on Outside Employment Requested

Jason Wilson, Division Director/Real Estate, 305-869-4643.

Evelyn Campos
Division Director / Professional Compliance Division
Miami-Dade Aviation Department
P.O. Box 025504
Miami, Fla 33102-5504
305-876-7390 Office
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From: Diaz-Greco, Gilma M. (COE) [<mailto:GDIAZGR@miamidade.gov>]
Sent: Monday, April 13, 2015 3:03 PM
To: Campos, Evelyn (Aviation)
Subject: RE: Opinion on Outside Employment Requested

Thank you Evelyn- the name of her supervisor is not legible on the request for outside employment form. Would you please email me her supervisor's name and phone number?

From: Campos, Evelyn (Aviation) [<mailto:ECampos@miami-airport.com>]
Sent: Monday, April 13, 2015 2:41 PM
To: Diaz-Greco, Gilma M. (COE)
Cc: Jimenez, Barbara S. (Aviation); Wilson, Jason (Aviation); Campos, Evelyn (Aviation)
Subject: RE: Opinion on Outside Employment Requested

Mimi,
Below, in red, please find the additional information requested from MDAD management regarding outside employment for L. Murray. Please advise if additional clarification is needed, thank you.

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From: Diaz-Greco, Gilma M. (COE) [<mailto:GDIAZGR@miamidade.gov>]
Sent: Tuesday, April 07, 2015 3:19 PM
To: Campos, Evelyn (Aviation)
Subject: RE: Opinion on Outside Employment Requested

Ms. Campos:

I have a few questions with regards to this inquiry:

- 1- Is this the first time Ms. Murray will be employed by MDC as an adjunct position teaching at cargo Building 701? **[Campos, Evelyn (Aviation)] Yes**
- 2- In her position as property manager for non-terminal leases does Ms. Murray **currently** oversee MDC's lease. **[Campos, Evelyn (Aviation)] No, she does not.** You indicate that she would not be given oversight in the future. However, it is not clear to me whether she currently oversees that lease and that what you are suggesting is that if granted permission to engage in outside employment for MDC, the MDC lease would be taken out of her supervision. **[Campos, Evelyn (Aviation)] Ms. Murray does not currently oversee the lease and has never had supervision of this lease. However, Aviation Management has now stated they cannot guarantee that Ms. Murray will not be required to oversee this lease prospectively, as she is a property manager for non-terminal buildings.**

Thanks and best regards,

Gilma (Mimi) Diaz-Greco
Staff Attorney



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From: Centorino, Joseph (COE)
Sent: Thursday, March 26, 2015 10:44 AM
To: Diaz-Greco, Gilma M. (COE)
Subject: FW: Opinion on Outside Employment Requested

Please handle.

From: Campos, Evelyn (Aviation) [<mailto:ECampos@miami-airport.com>]
Sent: Wednesday, March 25, 2015 3:27 PM
To: Centorino, Joseph (COE)
Cc: Jimenez, Barbara S. (Aviation); Napoli, Joe (Aviation)
Subject: Opinion on Outside Employment Requested

Mr. Centorino,

We respectfully request the Commission on Ethics provide an opinion on the attached request for Outside Employment as being a possible conflict of interest.

The requestor is an employee of the Aviation Department. She is a Property Manager responsible for overseeing non-terminal leases, such as Cargo Buildings, for the Airport. She is seeking outside employment as an adjunct professor for Miami Dade College. The College maintains a leasehold on MIA property and holds classes in Cargo Building 701, the same location where the planned outside employment will be conducted. The employee's supervisor has stated the employee will not be given oversight of the Miami Dade College leasehold however as a Property Manager with responsibilities over non-terminal leases, her responsibilities would normally include that and similar leases. Would it be appropriate and adequate to make a specific accommodation to remove the Miami Dade College lease from this employee's oversight responsibilities so they can accept the outside employment with the College?

We appreciate the Commission's assistance in addressing this issue.

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Sent: Tuesday, April 28, 2015 1:05 PM
To: Sanchez, Rodzandra (COE)
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INQ 15-77 Campos

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