

## Sanchez, Rodzandra (COE)

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Wednesday, August 10, 2016 3:46 PM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** Gerald Sanchez, Esq., Miami-Dade County Assistant County Attorney (2-11.1(u), Business Transaction With County Contractor) INQ 16-185

[INQ 16-185 Sanchez](#)

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**From:** Centorino, Joseph (COE)  
**Sent:** Monday, August 08, 2016 3:45 PM  
**To:** Turay, Radia (COE) <Radia.Turay@miamidade.gov>; Perez, Martha D. (COE) <perezmd@miamidade.gov>; Diaz-Greco, Gilma M. (COE) <GDIAZGR@miamidade.gov>  
**Subject:** INQ 16-185 Gerald Sanchez, Esq., Miami-Dade County Assistant County Attorney (2-11.1(u), Business Transaction With County Contractor)

Gerald Sanchez, Miami-Dade County Assistant County Attorney, inquired concerning whether it would present a conflict for a County Commissioner to act as a real estate agent for a private party in a private real estate transaction involving a non-profit organization receiving County funds. I advised Mr. Sanchez that it would not be a conflict where there was no connection between the transaction and any County business. Section 2-11.1(u) of the County Code would require that any transaction involving an elected official or other designated official with a County contractor be done at arms-length. Although a non-profit organization receiving County funds would be considered a County contractor due to the necessity of its executing an agreement with the County for expenditure of the funds, Section 2-11.1(u) exempts non-profit organizations from the provisions of that section. Nonetheless, I advised Mr. Sanchez that it would be prudent for the County Commissioner in this transaction to follow that general guideline of insuring that the transaction was kept at arms-length, due to the possibility of an appearance of impropriety arising from the circumstances.