
INQ 16-33

From: Perez, Martha D. (COE)
Sent: Tuesday, February 02, 2016 1:58 PM
To: 'jean.sanon@yahoo.com'
Cc: Centorino, Joseph (COE); Diaz-Greco, Gilma M. (COE)
Subject: Jean Sanon, Corrections Corporal, Dept. of Corrections & Rehabilitation, Denson Protective Services, Corp., Mom & Pop Grant Ethics Opinion INQ 16-31

Dear Mr. Sanon,

Attached is a Mom & Pop Grant Opinion. Please note that it indicates that you **may accept a grant** as long as the Miami-Dade County Department of Corrections & Rehabilitation is not involved in any way in processing or administering the grant. Further, **you may not lobby for the grant**. See County Ethics Code at Secs. 2-11.1(c) and (m)(1).

I will forward the original letter via regular mail. Please do not hesitate to contact me if you have further questions.

Sincerely,

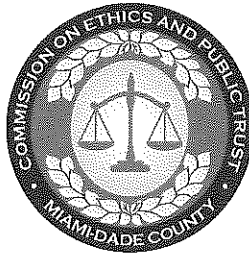
Martha D. Perez
Staff Attorney
MIAMI-DADE COUNTY COMMISSION ON ETHICS & PUBLIC TRUST
19 West Flagler St. Suite 820
Miami, FL 33130
(305)350-0656
PEREZMD@miamidade.gov

Miami-Dade County is a public entity subject to Chapter 119 of the Florida Statutes concerning public records. E-mail messages are covered under such laws and thus subject to disclosure.

MIAMI-DADE COMMISSION ON ETHICS AND PUBLIC TRUST

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Michael P. Murawski
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Miriam S. Ramos
DEPUTY GENERAL COUNSEL

Via First Class Mail
and email at: jean.sanon@yahoo.com

February 3, 2016

Jean D. Sanon
Denson Protective Services, Corp.
20451 N.W. 2nd Ave., Suite 208
Miami, FL 33169

*Please submit this letter to
the Neighbors and Neighbors
Association, Inc. The Ethics
Commission does not submit
this letter on your behalf*

Re: INQ 16-31, Mom & Pop Grant

Dear Mr. Sanon:

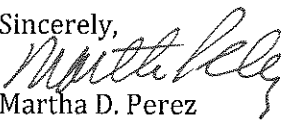
You asked if the County Ethics Code would prevent your privately owned company, Denson Protective Services, Corp., from accepting a Mom & Pop Grant funded through Commissioner Barbara Jordan's District 1 Office. You are employed by the Miami-Dade County Department of Corrections & Rehabilitation as a Corrections Corporal in the Program Services Division.

Briefly, your company may accept a grant as long as the Department of Corrections & Rehabilitation is not involved in any way in processing or administering the grant. You may not lobby for the grant. See County Ethics Code at Secs. 2-11.1(c) and (m)(1).

Be advised that the County Ethics Commission has interpreted lobbying very expansively when applied to County employees. This means that you may not contact anyone within the County, or anyone working on behalf of the County, in an attempt to influence his/her decision about the grant you are seeking.

This opinion construes the Miami-Dade Conflict of Interest and Code of Ethics Ordinance only and is not applicable to any conflict under State law. Inquiries regarding possible conflicts under State law should be directed to the State of Florida Commission on Ethics.

If any of the facts you have presented change or if you have further questions, please feel free to contact me at 305 350-0656.

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Martha D. Perez
Staff Attorney

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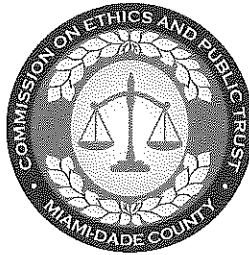
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Via First Class Mail
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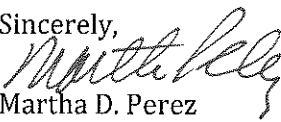
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