

## Sanchez, Rodzandra (COE)

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Thursday, August 17, 2017 9:32 AM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** FW: Deborah Margol, Deputy Director, Department of Cultural Affairs, Conflict of interest, INQ 17-204

[INQ 17-204 Margol](#)

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**From:** Perez, Martha D. (COE)  
**Sent:** Thursday, August 17, 2017 9:29 AM  
**To:** Margol, Deborah (CUA) <Deborah.Margol@miamidade.gov>  
**Cc:** Centorino, Joseph (COE) <Joseph.Centorino@miamidade.gov>; Diaz-Greco, Gilma M. (COE) <Gilma.Diaz-Greco@miamidade.gov>; Turay, Radia (COE) <Radia.Turay@miamidade.gov>  
**Subject:** Deborah Margol, Deputy Director, Department of Cultural Affairs, Conflict of interest, INQ 17-204

Good morning Debbie,

You inquired whether there is a conflict of interest in a non-profit County contractor hiring the son of one of its contributors as a consultant.

GableStage is a not-for-profit arts/theater company that contracts with Miami-Dade County for the management and operation of the Coconut Grove Playhouse. GableStage wishes to hire a well-known arts/theater consultant to assist in the operation of the Playhouse. The consultant's parent contributes to GableStage through the family Foundation. The agreement between Miami-Dade County and GableStage contains a general provision that GableStage is subject to all laws, County ordinances, rules and regulations.

This situation does not fall within the jurisdiction of the Ethics Commission unless the GableStage has been "designated" in the contract as a person or entity required to comply with the County's Conflict of Interest and Code of Ethics Ordinance. A general provision does not amount to such designation. See INQ 15-159, INQ 15-128, INQ 15-88

Consequently, GableStage is not subject to the County Ethics Code.

This opinion is based on the facts as presented. If any of these facts change, please contact me.

Sincerely,

**Martha D. Perez**

Staff Attorney

MIAMI-DADE COUNTY COMMISSION ON ETHICS & PUBLIC TRUST

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