

## Sanchez, Rodzandra (COE)

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Wednesday, September 06, 2017 3:13 PM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** FW: Gloria Kelly, G Kellys Enterprises, LLC (Limitations on contracting with the County) INQ 17-225  
**Attachments:** INQ 17-225 Kelly.pdf; G Kelly applic..pdf; Sunbiz G Kellys Entreprises.pdf

INQ 17-225 Kelly

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Wednesday, September 06, 2017 3:04 PM  
**To:** 'GKellysEnterprisesLLC@gmail.com' <GKellysEnterprisesLLC@gmail.com>  
**Cc:** Kelly, Joseph (ITD) <Joseph.Kelly@miamidade.gov>  
**Subject:** Gloria Kelly, G Kellys Enterprises, LLC (Limitations on contracting with the County) INQ 17-225

Dear Ms. Kelly:

Attached is the Limitations on Doing Business with the County Ethics Opinion letter. Please note that it indicates that G Kellys Enterprises, LLC, your privately owned company, may enter into contracts with Miami-Dade County, but not with the Miami-Dade Information Technology Department.

You may submit a copy of this letter to the procurement department and print a copy of it for your records.

Please contact me if you have any further questions.

Cordially,

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  
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# MIAMI-DADE COMMISSION ON ETHICS AND PUBLIC TRUST

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EXECUTIVE DIRECTOR  
General Counsel  
Michael P. Murawski  
ADVOCATE

Via email at: [gkellysenterprisesllc@gmail.com](mailto:gkellysenterprisesllc@gmail.com)

September 6, 2017

Gloria D. Kelly  
G Kelly's Enterprises, LLC  
14550 SW 77<sup>th</sup> Street  
Miami, FL 33183

*Please submit this letter to the Procurement Management Services Division with your Relatives of County Employees Wishing to Register as County Vendors' application. The Ethics Commission does not submit this letter on your behalf*

Re: INQ 17-225, Limitations on Doing Business with the County

Dear Ms. Kelly:

You have inquired about limitations on doing business with the County. In your application dated September 6, 2017, you advised the Ethics Commission that while you are not a County employee, your spouse, Joseph J. Kelly, is a County employee who works for the Miami-Dade County Information Technology Department ("ITD") as a Senior Telecommunications Technician.

The County Ethics Code at Sections 2-11.1(c)(2) and (d) allow you to enter into a contract, individually or through a firm, with Miami-Dade County, as long as the contract does not interfere with the full and faithful discharge of your spouse's duties to the County. This means that your spouse, Joseph J. Kelly, shall not participate in determining the contract requirements or in awarding the contract. Additionally, none of Mr. Kelly's job responsibilities and job descriptions shall require him to be involved in the contract in any way including, but not limited to, its enforcement, oversight, administration, amendment, extension, termination or forbearance. In your case this means that G Kelly's Enterprises, LLC shall not enter into contracts with the Miami-Dade County's Information Technology Department.

Furthermore, you spouse may not use his County position to secure **special privileges or exemptions** with respect to the contract and he may not lobby the County on behalf of your firm. See County Ethics Code §§ 2-11.1(g) and (m).

This opinion is limited to the facts as you presented them to the Commission on Ethics regarding conflicts under Subsections (c), (d), (g), and (m) of the Miami-Dade Conflict of Interest and Code of Ethics Ordinance only. Other conflicts, based on directives from your Department or under state law, may apply. If you have additional questions regarding possible conflicts based on Department directives, contact your Department supervisor or the Mayor's Office. Questions regarding the state ethics laws should be addressed to the State of Florida Commission on Ethics.

Feel free to contact me at 305 350-0638 if I can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Gilma Diaz-Greco". The signature is fluid and cursive, with a large initial "G" and "D".

Gilma (Mimi) Diaz-Greco  
Staff Attorney

INQ 17-225  
Kelly

Page 2

## Relatives of County Employees Wishing to Register as County Vendors

Please submit the following information by mail, fax, **or** email to—

Gilma Diaz-Greco, Staff Attorney  
The Commission on Ethics & Public Trust  
19 West Flagler St., Suite 820  
Miami, FL 33130

Phone: (305) 350-0638  
Fax: (305) 579-0273  
Email: [gdiazgr@miamidade.gov](mailto:gdiazgr@miamidade.gov)

YOUR NAME	Gloria D. Kelly
Name of Your Business	G Kellys Enterprises LLC
Type of Business	Construction
Your Mailing Address	14550 SW 77 Street, Miami FL 33183
Your Daytime Phone	(305) 297-4627
Your Email	GKellysEnterprisesLLC@Gmail.com
Name of county employee who is related to you	Joseph J. Kelly
Type of relationship— spouse? child? parent? other?	Spouse
County employee's department, if known	ITD
County employee's title, if known	Senior Telecommunication Technician
Please list the <b>names, titles, and departments</b> of any other immediate family members currently employed by Miami-Dade Co.	

The Miami-Dade County Conflict of Interest & Code of Ethics at § 2-11.1 (c)(2) allows immediate family members of County employees to contract with the County in certain circumstances and if the following criteria are met. Please confirm that you and your immediate family member/s will be able to meet all of these criteria:

1. Entering into a contract with the County will not interfere with the full and faithful discharge of the County employee's duties to the County.
2. The County employee will not participate in determining your contract requirements.
3. The County employee will not participate in awarding the contract.
4. The County employee's job responsibilities and job description will not require him/her to be involved in the contract in any way including, but not limited to, its enforcement, oversight, administration, amendment, extension, termination, or forbearance.
5. The County employee will not be working in the County department that enforces, oversees, or administers your contract.

I have read these requirements and pledge to abide by them.

Gloria D. Kelly  
Signature

9-1-2017  
Date

Your ethics opinion will be sent to you by first class mail and email, unless you request another type of delivery.