

## Sanchez, Rodzandra (COE)

---

**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Monday, November 20, 2017 1:40 PM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** FW: George Poulos, Chief Security, PROS, (Outside employment (j), (k)), INQ 17-263

INQ 17-263 Poulos

---

**From:** Poulos, George (MDPR)  
**Sent:** Monday, November 20, 2017 12:36 PM  
**To:** Perez, Martha D. (COE) <Martha.Perez2@miamidade.gov>  
**Cc:** Centorino, Joseph (COE) <Joseph.Centorino@miamidade.gov>; Murawski, Michael P. (COE) <Michael.Murawski@miamidade.gov>; Diaz-Greco, Gilma M. (COE) <Gilma.Diaz-Greco@miamidade.gov>; Turay, Radia (COE) <Radia.Turay@miamidade.gov>  
**Subject:** Re: George Poulos, Chief Security, PROS, Outside employment (j), (k), INQ 17-263

Thank you for your response.

**George Poulos**, Chief, FCPP.  
**Miami-Dade County Parks,  
Recreation and Open Spaces Department  
Park Enforcement Division**  
[12451 S.W. 184 Street](#)  
[Miami, Fl. 33177](#)  
Tel. [305-278-5197](#) Fax. [305-235-8667](#)  
[www.miamidade.gov](#)  
"Delivering excellence Everyday"

On Nov 20, 2017, at 9:44 AM, Perez, Martha D. (COE) <[Martha.Perez2@miamidade.gov](mailto:Martha.Perez2@miamidade.gov)> wrote:

Dear Chief Poulos,

You inquire whether there may be a conflict between your County employment and your outside employment as part-time Instructor at Miami-Dade College School of Justice (MDC), a County vendor.

### Background

You are the Chief of Security and Enforcement for the County's Parks, Recreation & Open Spaces Department (PROS). As part of your County duties, you manage about 80 employees consisting of security officers, code enforcement officers, parking enforcement specialists, etc. You also oversee alarm services and protective services for properties within County parks. You perform all administrative duties within your Division.

Your outside employment consists of teaching a myriad of topics (domestic violence, elder abuse, juvenile sexual offenses, traffic stops, profiling, high-risk traffic, parking enforcement) to law enforcement, code enforcement officers and certification candidates. You advise that your teaching

takes place on your days off. Additionally, “[f]rom time to time the Parks Department sends employees to be certified [as] parking enforcement specialist [which] requires the FDLE curriculum for certification...[which you] teach ....however, because some of these employees may work under [your] division... [the Assistant Director must] approve the PO to avoid any conflict.”

This request for outside employment has been approved by your Supervisors for the past 5 years, “without hesitation.”

### Analysis

The County Code at Section 2-11.1(j) prohibits a County employee from accepting outside employment that would impair his or her independence of judgment in the performance of his or her public duties. See County’s Administrative Order 7-1. Generally, the County Ethics Code does not prevent an employee from being employed by a County vendor, as long as the employee does not have any involvement with the vendor’s contract. See INQ 17-236; INQ 15-115; INQ 11-67.

Based on the facts presented, your outside employment is not likely to impair your independence of judgment in the performance of your public duties because: you do not have the authority to approve or disapprove any contracts or agreements between MDC and PROS for purposes of training or certification of PROS employees; although some PROS employees may be taking your class at some point per the County’s certification requirements, PROS must approve all those requests; you have no involvement in the selection, oversight, management or administration of PROS training vendors; your involvement in the decision-making process regarding Parking Enforcement Specialist training is confined to FDLE certification requirements which may only be attained through the School of Justice; you do not have any input into promotions of PROS employees who attend/may attend your class; and, your outside employment occurs outside your County hours. Additionally, your supervisor(s) have approved this outside employment for the past five (5) years. See RQO 09-16; INQ 06-131; INQ 16-137; INQ 16-288; INQ 17-236

As a reminder, pursuant to Section 2-11 of the County Code, County employees are required to request permission to engage in outside employment from their supervisor on a yearly basis and complete an Outside Employment Statement by July 1<sup>st</sup> of each year. See § 2-11.1(k)(2), A.O.7-1. In addition, County employees employed by County vendors must file an Affidavit with the Miami-Dade County Clerk of the Courts disclosing employment with that vendor. See §2-11.1(f). Finally, County employees are also reminded of the following limitations:

- A County employee is prohibited from using County time or resources in furtherance of his or her outside employment. § 2-11.1(g)
- A County employee is prohibited from using any confidential information acquired as a result of his or her County employment. §2-11.1(h)
- A County employee is prohibited from representing his other outside employer in any matter before the County. §2-11.1(m)
- A County employee may not use his or her official position to secure privileges or exemptions for themselves or others. § 2-11.1(g) In the event that, pursuant to your County duties, you are tasked with the evaluation or promotion of a student in your outside employment, it is recommended that such responsibility be delegated to another administrator within your division to avoid an inquiry into your independence of judgment in the performance of your County duties as Chief of PROS Park Enforcement Division. See INQ 16-13

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

Best regards,

**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](mailto:PEREZMD@miamidade.gov)

This email and any attachments are for the exclusive and confidential use of the intended recipient(s). If you are not an intended recipient, please do not read, distribute or take action in reliance upon this message. If you have received this in error, please notify me immediately by return email and promptly delete this message and its attachments from your computer. Miami-Dade County is a public entity subject to Florida's public record laws. Any communication with this office, including e-mail messages, could be considered a public record subject to disclosure.

---

**From:** Ethics (COE)

**Sent:** Tuesday, November 14, 2017 2:43 PM

**To:** Perez, Martha D. (COE) <[Martha.Perez2@miamidade.gov](mailto:Martha.Perez2@miamidade.gov)>

**Subject:** Opinion Request

Please handle. Thanks.

---

**From:** Poulos, George (MDPR)

**Sent:** Tuesday, November 14, 2017 11:41 AM

**To:** Ethics (COE) <[ethics@miamidade.gov](mailto:ethics@miamidade.gov)>

**Subject:**

Good morning,

I am seeking an opinion for my outside emplacement, I am a Police Instructor part-time at the School of Justice at Miami Dade College and they are vender of Miami-Dade County. I teach law enforcement officers, code enforcement officer, etc. the county sends officers or employees to MD College for training. Is this considered a conflict?

I teach the following below:

- Domestic Violence.
- Elderly Abuse.
- Juvenile Sexual Offender.
- Professional Traffic Stops
- Profiling.
- High Risk Traffic.
- Parking Enforcement.

Thanks

**George Poulos**, Chief, FCPP.

**Miami-Dade County Parks,**

**Recreation and Open Spaces Department**

**Park Enforcement Division**

12451 S.W. 184 Street

Miami, Fl. 33177

Tel. 305-278-5197 Fax. 305-235-8667

[www.miamidade.gov](http://www.miamidade.gov)

"Delivering excellence Everyday"

<image001.jpg><image002.jpg>

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.