

## Sanchez, Rodzandra (COE)

---

**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Tuesday, February 21, 2017 11:21 AM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** FW: Limitations on Doing Business with the County Ethics Opinion INQ 17-44  
**Attachments:** INQ 17- 44 Green.pdf; Green Applic.pdf; Green bluebook.pdf; Sparkles Maint. Inc.-Sunbiz.pdf

INQ 17-44 Green

---

**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Tuesday, February 21, 2017 11:09 AM  
**To:** 'joyce.johnson0157@yahoo.com' <joyce.johnson0157@yahoo.com>  
**Subject:** Limitations on Doing Business with the County Ethics Opinion INQ 17-44

Dear Ms. Green:

Attached is the Limitations on Doing Business with the County Ethics Opinion. Please note that it indicates that you may enter contracts with Miami-Dade County, but not with the Miami- Miami-Dade Communications Department which employs you. Miami-Dade code 2-11.1 (c)and (d).Further, you are required to request permission for outside employment annually, and you may not lobby for any contract between your business and Miami-Dade County. See the County Ethics Code at Secs. 2-11.1 (c) and (m)(1).).

You may print a copy of the letter and submit it to the Procurement Department and also print a copy for your records. Please do not hesitate to contact me if you have further questions.

Sincerely,

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  
Fax: (305) 579-0273  
[gdiazgr@miamidade.gov](mailto:gdiazgr@miamidade.gov)  
[www.facebook.com/MiamiDadeEthics](http://www.facebook.com/MiamiDadeEthics)

# MIAMI-DADE COMMISSION ON ETHICS AND PUBLIC TRUST

## COMMISSIONERS

Judge Lawrence Schwartz, CHAIR  
H. Jeffrey Cutler VICE-CHAIR  
Nelson Bellido,  
Judith Bernier  
Marcia Narine Weldon



## EXECUTIVE STAFF

Joseph M. Centorino  
EXECUTIVE DIRECTOR  
General Counsel  
Michael P. Murawski  
ADVOCATE

Via email at:

[loyce.johnson0157@yahoo.com](mailto:loyce.johnson0157@yahoo.com)

February 17, 2017

Joyce J. Green  
2240 NW 171<sup>st</sup> Terrace  
Miami Gardens, FL. 33056

*Please submit this letter to  
the Procurement  
Department. The Ethics  
Commission does not submit  
this letter on your behalf*

Re: **INO 17-44**, Limitations on Doing Business with the County

Dear Ms. Green:

On February 10, 2017, you asked about limitations in doing business with the County through your privately owned business, Sparkles Maintenance of Tri-County Inc. (Sparkles). You are employed as a Customer Service Transit Agent with the Miami-Dade Communications Department (COM).

Sparkles may enter into contracts with Miami-Dade County but not with the COM. This opinion is based on the following facts and legal analysis:

### OUTSIDE EMPLOYMENT

Work conducted for your privately owned business constitutes outside employment. The Ethics Code prohibits County employees from engaging in conflicting outside employment. You will be required to obtain permission to engage in outside employment annually from your supervisor and file related financial disclosure forms every year. Conflicting employment is sometimes created when a County employee comes in contact with the same or similar people or entities in both his outside employment and in his County job or when he uses the same or similar resources in his outside employment as he uses in his County work. *See* the County Code at Secs. 2-11.1 (g) and (j).

**Please note that this letter does not grant you permission to engage in outside employment.** You must obtain permission to engage in outside employment annually from your supervisor and file related financial disclosure forms every year.

#### CONTRACTING WITH THE COUNTY

Once you have been granted permission to engage in outside employment, you may enter into a County contract through your privately owned business, Sparkles, as long as the contract does not interfere with the full and faithful discharge of your duties to the County. *See* the County Ethics Code at Secs. 2-11.1 (c) (2) and (d).

This includes the condition that you may not participate in determining the contract requirements or in awarding the contract. Additionally, none of your job responsibilities and job descriptions may require you to be involved in the contract in any way including, but not limited to, its enforcement, oversight, administration, amendment, extension, termination or forbearance. Finally, you may **not** work in any County department that would enforce, oversee or administer this contract. Consequently, Sparkles may not enter into contracts with the COM.

#### LOBBYING

Additionally, you may not lobby the County. In this case, while you not contact anyone within the County in an attempt to **influence** a decision about any contract Sparkles is seeking. *See* the County Ethics Code at Sec. 2-11.1 (m)(1).

This opinion construes the Miami-Dade County Ethics Code as it applies to County employee-vendors at Secs. 2-11.1 (c), (d) and (m)(1) only. It is not applicable to any conflicts under other sections of the County Code or to issues related to state or federal laws.

If any of the facts you have presented change or if you have further questions, please feel free to contact me at 305 350-0638.

Sincerely,



Gilma Diaz-Greco  
Staff Attorney

INQ 17-44  
Green  
Page 2



[Department of State](#) / [Division of Corporations](#) / [Search Records](#) / [Detail By Document Number](#) /

## Detail by Entity Name

Florida Profit Corporation  
SPARKLES MAINTENANCE OF TRI-COUNTY, INC.

### Filing Information

<b>Document Number</b>	P09000091858
<b>FEI/EIN Number</b>	01-0934673
<b>Date Filed</b>	11/06/2009
<b>Effective Date</b>	11/04/2009
<b>State</b>	FL
<b>Status</b>	ACTIVE

### Principal Address

2240 NW 171ST TER  
MIAMI GARDENS, FL 33056

Changed: 03/24/2015

### Mailing Address

P. O. BOX 170982  
HIALEAH, FL 33017

Changed: 04/23/2010

### Registered Agent Name & Address

Johnson, Joyce L  
2240 NW 171ST TER  
MIAMI GARDENS, FL 33056

Name Changed: 04/10/2014

Address Changed: 03/24/2015

### Officer/Director Detail

#### **Name & Address**

Title PRES

JOHNSON, JOYCE  
P. O. BOX 170982  
HIALEAH, FL 33017

### Annual Reports

<b>Report Year</b>	<b>Filed Date</b>
2014	04/10/2014
2015	03/24/2015
2016	03/08/2016

**Document Images**

<a href="#">03/08/2016 – ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">03/24/2015 – ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">04/10/2014 – ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">04/30/2013 – ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">04/30/2012 – ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">04/29/2011 – ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">04/23/2010 – ANNUAL REPORT</a>	<a href="#">View image in PDF format</a>
<a href="#">11/06/2009 – Domestic Profit</a>	<a href="#">View image in PDF format</a>

My BlueBook Profile

### Search for County Employee

Select Department

Select Department ▼

Last Name                      First Name                      Office Number (305-xxx-xxxx)

Green                      Joyce                     

Exact Match

**Locate** | **Clear** | [My Blue Book Info](#)

**Results**

This is 1 out of 1 pages of results.

First Name	Last Name	Position	Division	Department	Email Address	Phone Number	Office Location
JOYCE	GREEN	CALSTRSPEC	CUSTOMER SERVICE AND OUTREACH	COMMUNICATIONS	jjgreen@miamidade.gov	305-468-5900	2700 NW 87TH AVE Doral FL 33172

This is 1 out of 1 pages of results.

A production of the Communications Department (COM). Enabled by the Information Technology Department (ITD).

[Feedback](#) | [Help](#) | [eNet Roadmap](#) | For Password Assistance call 305-596-HELP

## 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)

Employee's Name	Joyce J. Green
Employee's Dept.	311 Communications CEAD
Employee's Title	Customer Service Transit Agent
Business Name	Sparkles Maintenance OF Tri-county area
Type of Business	Janitorial Service
Employee's Mailing Address	2240 NW 175 Ter Miami Gardens FLA 33056
Employee's Daytime Phone	305-308-8444
Employee's Preferred Email	Joyce.Johnson.0157@yahoo.com
Immediate Family Members	(Please list the names, titles, and departments of any immediate family members currently employed by Miami-Dade Co.) None

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

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

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

Joyce J. Green  
Signature

2-10-17  
Date

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

COE 11/2013