

## Sanchez, Rodzandra (COE)

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Monday, February 27, 2017 2:56 PM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** FW: Limitations on Doing Business with the County Ethics Opinion INQ 17-53  
**Attachments:** INQ 17- 53 Sibori.pdf; Sibori Applic.pdf; Sibori bluebook.pdf; Accoustical Ceiling LLC sunbiz.pdf

INQ 17-53 Sibori

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Monday, February 27, 2017 2:51 PM  
**To:** 'siboriacoustical@gmial.com' <siboriacoustical@gmial.com>; Sibori, Elizabeth (CAHSD) <Elizabeth.Sibori@miamidade.gov>  
**Subject:** Limitations on Doing Business with the County Ethics Opinion INQ 17-53

Dear Ms. Sibori:

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- Dade Community Action and Human Services 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)

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# MIAMI-DADE COMMISSION ON ETHICS AND PUBLIC TRUST

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General Counsel  
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ADVOCATE

Via email at:

[Siboriacoustical@gmail.com](mailto:Siboriacoustical@gmail.com)

February 24, 2017

Elizabeth Sibori  
8556 SW 208 Street  
Cutler Bay, FL. 33189

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

Re: **INO 17-53**, Limitations on Doing Business with the County

Dear Ms. Sibori:

On February 21, 2017, you asked about limitations in doing business with the County through the business privately owned by you and your husband, Sibori Ceiling Acoustical LLC. You are a County employee who is employed as an Eligibility Interviewer with the Miami-Dade Community Action and Human Service Department (CAHSD).

We conclude that Sibori Ceiling Acoustical LLC may enter into contracts with Miami-Dade County but not with the CAHSD. 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, Sibori Ceiling Acoustical LLC, 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, Sibori Ceiling Acoustical LLC may not enter into contracts with the CAHSD.

#### LOBBYING

Additionally, you may not lobby the County. In this case, it means that you may not contact anyone within the County in an attempt to **influence** a decision about any contract Sibori Ceiling Acoustical LLC 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 17-53  
Sibori  
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## 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: [gdiagr@miamidade.gov](mailto:gdiagr@miamidade.gov)


Employee's Name	Elizabeth Sibori
Employee's Dept.	Miami Dade Community Action & Human Serv Dept.
Employee's Title	Eligibility Interviewer
Business Name	Sibori Ceiling Acoustical LLC
Type of Business	Acoustical Ceiling Installation & Repair
Employee's Mailing Address	8556 SW 208 St Cutler Bay, FL 33189
Employee's Daytime Phone	786-709-6603
Employee's Preferred Email	SIBORIAACOUSTICAL@gmail.com
Immediate Family Members	

*(Please list the names, titles, and departments of any 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 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.

  
\_\_\_\_\_  
Signature

2/21/17  
\_\_\_\_\_  
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



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

## Detail by Entity Name

Florida Limited Liability Company  
SIBORI CEILING ACOUSTICAL LLC

### Filing Information

<b>Document Number</b>	L14000151796
<b>FEI/EIN Number</b>	47-1962512
<b>Date Filed</b>	09/29/2014
<b>Effective Date</b>	09/29/2014
<b>State</b>	FL
<b>Status</b>	ACTIVE

### Principal Address

8556 SW 208 ST  
CUTLER BAY, FL 33189

### Mailing Address

8556 SW 208 ST  
CUTLER BAY, FL 33189

### Registered Agent Name & Address

SIBORI, ELIZABETH  
8556 SW 208 ST  
CUTLER BAY, FL 33189

### Authorized Person(s) Detail

#### **Name & Address**

Title Authorized Member

SIBORI, ARIEL  
8556 SW 208 ST  
CUTLER BAY, FL 33189

Title Manager

SIBORI, ELIZABETH  
8556 SW 208 ST  
CUTLER BAY, FL 33189

### Annual Reports

<b>Report Year</b>	<b>Filed Date</b>
2015	02/19/2015

2016 03/09/2016  
2017 01/31/2017

**Document Images**

<a href="#">01/31/2017 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">03/09/2016 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">02/19/2015 -- ANNUAL REPORT</a>	View image in PDF format
<a href="#">09/29/2014 -- Florida Limited Liability</a>	View image in PDF format

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### Search for County Employee

Select Department

Select Department ▼

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

Sibori                              Elizabeth                             

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
ELIZABETH	SIBORI	ELIGIBILT	FAMILY AND COMMUNITY SERVICES	COMMUNITY ACTION AND HUMAN SERVICES	earias@miamidade.gov	305-258-5471	13955 SW 264TH ST Homestead FL 33032

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