

## Sanchez, Rodzandra (COE)

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Tuesday, March 07, 2017 9:13 AM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** Shannon Tookes, Correctional Officer, Miami-Dade Corrections and Rehabilitation Department (outside employment) INQ 17-64

FW: INQ 17-64

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**From:** Turay, Radia (COE)  
**Sent:** Monday, March 06, 2017 4:51 PM  
**To:** Tookes, Shannon (MDCR) <[Shannon.Tookes@miamidade.gov](mailto:Shannon.Tookes@miamidade.gov)>  
**Cc:** Kirkland, Tina (MDCR) <[Tina.Kirkland@miamidade.gov](mailto:Tina.Kirkland@miamidade.gov)>; Centorino, Joseph (COE) <[Joseph.Centorino@miamidade.gov](mailto:Joseph.Centorino@miamidade.gov)>  
**Subject:** INQ 17-64, Shannon Tookes, Correctional Officer, Miami-Dade Corrections and Rehabilitation Department (outside employment)

Dear Ms. Tookes,

You have inquired whether a conflict of interest exists under the Ethics Code between your County employment and your proposed outside employment as a landlord.

### Background

You are a correctional officer with the Hospital Services Unit at Miami-Dade Corrections and Rehabilitation Department (MDCR). Your current job responsibilities includes care, custody and control of inmates.

You are seeking to engage in outside employment as a landlord. You own two rental units. Aside from owning these properties, you are not engaged in any other type of private outside business.

### Analysis

A County employee who owns *less* than three (3) rental units is not engaged in outside employment. See RQO 06-48; INQ 14-14; INQ 13-309; See *also* Ethics Commission "Outside Employment Guidelines" Memorandum (September 2014). Consequently, you **are not** engaged in outside employment, hence, you **are not required** to file a Request for Outside Employment (pursuant to Sec. 2-11, County Code, and AO 7-1) or an Outside Employment Statement (pursuant to Sec. 2-11.1(k)(2), county Ethics Code).

This opinion is based on facts as you have presented them to the Ethics Commission. Please contact us if these facts change.

Sincerely,

**RADIA TURAY**

Staff Attorney  
Miami-Dade Commission on Ethics and Public Trust  
19 W. Flagler Street, Suite 820  
Miami, FL 33130

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Fax: (305) 579-0273  
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**From:** Turay, Radia (COE)  
**Sent:** Monday, March 06, 2017 11:21 AM  
**To:** Tookes, Shannon (MDCR) <[Shannon.Tookes@miamidade.gov](mailto:Shannon.Tookes@miamidade.gov)>  
**Subject:** Outside Employment Inquiry

Hello Ms. Tookes,

My name is Radia Turay. I am a staff attorney at the Miami-Dade Commission on Ethics. We received an inquiry regarding your proposed outside employment as a landlord. We have a couple of questions regarding same. Please give me a call back at 305-350.0601 when you get a chance.

Thanks,

**RADIA TURAY**

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Miami-Dade Commission on Ethics and Public Trust  
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