

Sanchez, Rodzandra (COE)

From: Diaz-Greco, Gilma M. (COE)
Sent: Wednesday, April 12, 2017 1:30 PM
To: Sanchez, Rodzandra (COE)
Subject: Trenae Floyd, Administrative Officer 3, MDCR (outside employment) INQ 17-66,
Attachments: RQO 00-136 Floyd, T. Letter & Opinion.pdf

INQ 17-66 Floyd

From: Turay, Radia (COE)
Sent: Wednesday, April 12, 2017 1:29 PM
To: Sanchez, Rodzandra (COE) <Rodzandra.Sanchez@miamidade.gov>
Cc: Diaz-Greco, Gilma M. (COE) <Gilma.Diaz-Greco@miamidade.gov>; Perez, Martha D. (COE) <perezmd@miamidade.gov>
Subject: FW: INQ 17-66, Trenae Floyd, Administrative Officer 3, MDCR (outside employment)

From: Turay, Radia (COE)
Sent: Monday, March 06, 2017 4:59 PM
To: Floyd, Trenae (MDCR) <trenae@miamidade.gov>
Cc: Centorino, Joseph (COE) <Joseph.Centorino@miamidade.gov>; Kirkland, Tina (MDCR) <Tina.Kirkland@miamidade.gov>
Subject: INQ 17-66, Trenae Floyd, Administrative Officer 3, MDCR (outside employment)

Dear Ms. Floyd,

You have inquired whether a conflict of interest exists under the Ethics Code between your County employment and your proposed outside employment as the Owner/President of Von Enterprises International, Inc. (Von Enterprises).

Background

You are an Administrative Officer 3 in the Policy and Planning Bureau of Miami-Dade Corrections and Rehabilitation Department (MDCR). Your current job responsibilities include research and development of policies and procedures for MDCR; updating the Inmate Handbook; preparing documents for the Promotional Exams for Corporals, Sergeants and Lieutenants; and writing procedural directives, standard operating procedures, and memorandums on behalf of the Bureau Commander.

You are seeking to engage in outside employment as the Owner/President of Von Enterprises. Von Enterprises is an international communications company based in Miami, Florida. In your role as an Owner/President you will work on innovative projects, write press releases, write speeches, produce video projects, and plan special events. You will not seek to do business with MDCR and/or any other department within Miami-Dade County's local government.

Legal Analysis

Sections 2-11.1(j) and (k) of the County Ethics Code prohibit County employees from engaging in outside employment which would impair the County employee's independence of judgment in the performance of his or her official duties. Based on the information that you have provided to us at this time, it appears to be unlikely that the type of

outside employment that you are seeking to engage in would impair your independence of judgement in the performance of your duties as Administrative Officer 3 in the Policy and Planning Bureau of MDCR.

As a reminder, pursuant to the Miami-Dade County Code at Section 2-11, government employees are required to request permission to engage in outside employment from their supervisor on a yearly basis. In addition, Sec. 2-11.1(k)(2) of the Code requires filing an outside employment disclosure form on a yearly basis. Government employees are also cautioned that they may not engage in any activity which would require them to disclose confidential information acquired by reason of their official position, nor use such information directly or indirectly for their personal gain or benefit. See Sec. 2-11.1(h), Ethics Code. Lastly, a government employee may not use his or her official position to secure privileges or exemptions for themselves or others. See Sec.2-11.1(g), Ethics Code.

This opinion is based on the facts presented. If any of the facts presented here change, or if you have any further questions, please contact us.

Sincerely,

RADIA TURAY

Staff Attorney

Miami-Dade Commission on Ethics and Public Trust

19 W. Flagler Street, Suite 820

Miami, FL 33130

Tel: (305) 350-0601

Fax: (305) 579-0273

Ethics.miamidade.gov

From: Floyd, Treae (MDCR)

Sent: Monday, March 06, 2017 12:55 PM

To: Turay, Radia (COE) <Radia.Turay@miamidade.gov>

Subject: RE: Outside employment Inquiry

Good afternoon Attorney Turay:

In response to your inquiry, please note the following below:

Response to Question 1

I am classified as an Administrative Officer 3. However, my "working title" is Policy Writer in the Policy and Planning Bureau. My chain of command includes the following below:

- Immediate Supervisor: Daphne Killing, Special Projects Administrator 1, Policy Development Unit
- Ms. Killings' Supervisor: Lt. Erica Dixon-Billups
- Lt. Dixon-Billups' Supervisor: Commander Omar Fernandez

I am responsible for research and development of policies and procedures for the Miami-Dade Corrections and Rehabilitation Department. That entails meeting with subject matter experts to get their input regarding the correct manner in which officers operate within the jails. That information is used to update and develop policies and make sure that they are compliant.

I am also responsible for updating the Inmate Handbook, which is a document that outlines the do's and don'ts for those who are incarcerated. One of my current projects includes preparing the documents for the Promotional Exams for Corporals, Sergeants and Lieutenants. I am working with SMEs to identify the most effective policies to ensure correctional candidates are prepared if they are promoted.

Other responsibilities include writing procedural directives, standard operating procedures and memorandums on behalf of the Bureau Commander.

Response to Question 2

I am currently the owner of Von Enterprises International, Inc., an international communications company based in Miami, Florida. As the owner, I am responsible for working on innovative projects, writing press releases, writing speeches, producing video projects, and special events. I have owned this company since August 2000. Each year that I have worked for Miami-Dade County, I have filled out the Outside Employment information. (Please check with the Elections Department to verify this information.)

I work approximately eight hours a week. However, since my back surgery in May 2014, the hours and my ability to devote eight hours each week has been severely cut short, as I have dealt with serious health issues stemming from that surgery. I have maintained my practice because I still consult with other practitioners in the business.

Response to Question 3

Please note that I will NOT be seeking to do business with Miami-Dade Corrections and Rehabilitation or any other department within Miami-Dade County's local government.

Please also note that in the past, I have sought an opinion from the Commission on Ethics and Public Trust. You should have a copy in your files. It was from Robert Myers' administration. The opinion was approved by the then Board, and I believe the opinion was rendered by Ardeth, If I remember correctly.

If you need to speak to me regarding these responses, please do not hesitate to contact me via my direct line at (786) 263-6294. My work hours are 8 a.m. – 5 p.m., Monday – Friday.

Sincerely,
Trenae Floyd

From: Turay, Radia (COE)
Sent: Monday, March 06, 2017 12:08 PM
To: Floyd, Trenae (MDCR)
Subject: Outside employment Inquiry

Hello Ms. Floyd,

My name is Radia Turay. I am a staff attorney with the Miami-Dade Commission on Ethics and Public Trust. We received an inquiry regarding your proposed outside employment. We have a couple of questions regarding same.

- 1) Please provide a full description of your job duties at the Miami-Dade Corrections and Rehabilitation Department.
- 2) Please provide a full description of the duties you will be performing for Von Enterprises International

3) Will you be seeking to do business with MDCR or Miami-Dade County

Further, please give me a call at 305-350-0601 when you get a chance.

Thanks,

RADIA TURAY

Staff Attorney

Miami-Dade Commission on Ethics and Public Trust

19 W. Flagler Street, Suite 820

Miami, FL 33130

Tel: (305) 350-0601

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