

Meyers, Robert (COE)

From: Meyers, Robert (COE)
Sent: Wednesday, December 10, 2003 2:57 PM
To: Sanchez, Martha (LIB)
Subject: RE: ETHICS QUESTION

INQ 03-120

Ms. Sanchez,

Thank you for your e-mail and I wanted to consult with Christina Prkic, our staff attorney, before providing you with a response. As I understand it, a Library employee is interested in doing consulting work part-time or full-time for a company currently doing business with Miami-Dade County. You want to know whether he can receive financial compensation from the company without violating the Conflict of Interest and Code of Ethics Ordinance.

There are a few general concerns that I want to share with you before addressing the main question. First, it isn't clear to me how this employee can hold a full-time job with the County and also work as a consultant on a full-time basis. Secondly, he cannot use County resources in furtherance of his outside employment activities. Finally, his request for outside employment must be approved by the Department Director before he can begin consulting and the employee must disclose the income he generates from his consulting work by July 1st of the year after he earned income from these endeavors. In other words, if he starts his business in 2004, he has to disclose the income he earned as a consultant by July 1, 2005.

Specifically, as far as the Conflict of Interest and Code of Ethics is concerned, he is not directly transacting business with the County because he is merely providing consulting services to a company that, in turn, is doing business with the County. I assume that the company is not doing business with the Library. If this is not the case, then I need more information about the relationship between the company and the Library.

In closing, based on the abovementioned facts, there appears to be no conflict of interest, but he needs to comply with the applicable Code provisions on outside employment. He should be mindful of the other issues I have raised, but they do not amount to conflicts of interest as defined in the Code of Ethics Ordinance.

If you need additional information, feel free to contact me at your convenience.

Sincerely,

Robert Meyers
Executive Director

-----Original Message-----

From: Sanchez, Martha (LIB)
Sent: Wednesday, December 10, 2003 1:59 PM
To: Meyers, Robert (COE)
Cc: Campa, Julio (MDPLS); 'castroj@mdlps.org'
Subject: RE: ETHICS QUESTION

Dear Mr. Meyers:

I was also asked to email below to Christina Prkic (and did). Thank you both for your time.

Martha Sanchez

-----Original Message-----

From: Sanchez, Martha (LIB)
Sent: Monday, December 08, 2003 10:29 AM
To: Meyers, Robert (COE)
Cc: Campa, Julio (MDPLS); 'castroj@mdlps.org'
Subject: ETHICS QUESTION

Dear Mr. Meyers:

A Library employee has the following question and we'd like your opinion.

This employee is a permanent full-time employee with our Automated Systems Section. He wants to know if he could work part-time or full-time for a company that is currently doing business with MDC. He wants to apply to be a (computer-related) consultant for this company. Of course, the work would be performed on the employee's off-time.

If monetary compensation is a conflict, could he work for them as a non-paid consultant?

Please let me know if you need additional information.

As always, thank you for your time and assistance,

Martha Sanchez
Library Personnel Manager
(305) 375-5337