

MIAMI-DADE COUNTY COMMISSION ON ETHICS & PUBLIC TRUST



REPORT OF INVESTIGATION

#K12-005

Date Opened: 01/06/12

Date Closed: 01/24/12

Investigator: Sylvia Batista

On April 26, 2011, the COE received an inquiry from Constantine A. Simpson, a Security Supervisor at the Miami-Dade Seaport Department (MDSD). Mr. Simpson submitted a county vendor registration for his outside business of security guard services. In his county vendor registration, Mr. Simpson lists the name of his business as Five O Security Protection.¹

The COE issue relates to a possible violation of the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance, Sec. 2-11.1(j) *Conflicting employment prohibited*.

On April 27, 2011, the COE provided Mr. Simpson with an ethics opinion wherein he is advised to obtain authorization for outside employment from his department director. Mr. Simpson is also told that once he has permission to engage in outside employment, he can bid on any county contract except on contracts with the MDSD.

¹ State of Florida corporate records reflect that Mr. Simpson's registered corporation is called Five O Firearms and Security Officer Training, Inc.

01/20/12 – Luis Gonzalez, Sr. Human Resources/Customer Service Manager, MDSD

At the request of the COE investigator, Mr. Gonzalez confirmed that Mr. Simpson had received authorization to engage in outside employment through his company, Five O Security Officer School and Five O Security Protection. Mr. Gonzalez provided the COE with a copy of the approved request for outside employment dated April of 2011.

1/24/12 – Luis Gonzalez, Sr. Human Resources/Customer Service Manager, MDSD

Mr. Gonzalez said that to his knowledge, Mr. Simpson has not contracted with the Seaport for any services, and is not on the Seaport's vendors list. Mr. Gonzalez advised that Mr. Simpson's direct supervisor is Jeffrey Parker, Seaport Security Supervisor 2.

1/24/12 – Gyselle M. Pino, Division Chief, Contracts, Procurement & Materials Management, MDSD

Ms. Pino confirmed that Five O Firearms and Security Officer Training, Inc., Five O Security Officer School and/or Five O Security Protection do not have any contracts with the MDSD, and are not on the Seaport vendors list.

1/24/12 – Jeffrey Parker, Seaport Security Supervisor 2, MDSD –

Mr. Parker explained that Mr. Simpson is his sergeant. Mr. Parker has daily contact with Mr. Simpson. Mr. Parker is Mr. Simpson's supervisor through the chain of command. Mr. Parker said that Mr. Simpson is an outstanding county employee. Mr. Parker said that he just gave Mr. Simpson an outstanding evaluation. Mr. Parker said that if Mr. Simpson is engaging in outside employment, he has not noticed it as Mr. Parker's work performance has consistently been outstanding.

Conclusion:

The purpose of this investigation is to monitor compliance by Mr. Simpson following receipt of an ethics opinion. Mr. Simpson is found to be in compliance with the ethics opinion provided.