

Sanchez, Rodzandra (COE)

From: Diaz-Greco, Gilma M. (COE)
Sent: Friday, March 22, 2019 11:05 AM
To: Crawford, Alan (MDFR); Crawford, Dawn (MDFR)
Cc: Arrojo, Jose (COE); Murawski, Michael P. (COE); Perez, Martha D. (COE); Turay, Radia (COE); Sanchez, Rodzandra (COE); Anderson, Machell (COE)
Subject: INQ 19-32, Dawn F. Crawford, Fire Rescue Dispatcher Supervisor, Miami-Dade Fire Rescue Department (Limitations on Contracting with the County)
Attachments: INQ 19-32 Crawford.pdf; Florida Sunbiz 3Ds Mobile.pdf

Dear Ms. Crawford:

Thank you for contacting the Miami-Dade Commission on Ethics and Public Trust and requesting our guidance regarding limitations on contracting with the County. Attached is INQ 19-32 addressing your question. Please do not hesitate to contact us if you have any questions or if we may be of further assistance.

Cordially,

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
www.facebook.com/MiamiDadeEthics

This email and any attachments are for the exclusive and confidential use of the intended recipient(s). If you are not an intended recipient, please do not read, distribute or take action in reliance upon this message. If you have received this in error, please notify me immediately by return email and promptly delete this message and its attachments from your computer. Miami-Dade County is a public entity subject to Florida's public record laws. Any communication with this office, including e-mail messages, could be considered a public record subject to disclosure.



MIAMI-DADE COMMISSION ON ETHICS AND PUBLIC TRUST

19 West Flagler Street, Suite 820 · Miami, Florida 33130

Phone: (305) 579-2594 · Facsimile: (305) 579-0273

Website: ethics.miamidade.gov

MEMORANDUM

TO: Dawn F. Crawford, Fire Rescue Dispatcher Supervisor, Miami-Dade Fire Rescue Department

FROM: Gilma Diaz-Greco, Staff Attorney
Commission on Ethics

SUBJECT: INQ 19-32

DATE: 3-22-19

CC: All COE Legal Staff

Thank you for contacting the Miami-Dade Commission on Ethics and Public Trust and requesting our guidance regarding Miami-Dade County employees applying to become County vendors.

Facts:

You are employed by the Miami-Dade Fire Rescue Department (“MDFR”) as a Fire Rescue Dispatcher Supervisor. You would like to contract with the County through your privately-owned business, 3Ds Mobile Gaming (“3Ds Gaming”), a game truck business which provides mobile gaming systems such as, Xbox, Nintendo, etc. for events and parties. 3Ds Gaming would like to apply to become County vendor to provide mobile gaming services at events organized by the Miami-Dade Parks and Recreation Department.

Issue:

Whether the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance (“County Ethics Code”) would prevent your privately-owned company, 3Ds Gaming from contracting with the County.

Discussion and Opinion

Your inquiry involves several sections of the County Ethics Code which are analyzed below:

A. Outside Employment

Work conducted for 3Ds Gaming, your privately-owned business, constitutes outside employment. The County Ethics Code prohibits County employees from engaging in conflicting outside employment. Conflicting employment is sometimes created when a County employee comes in contact with the same or similar people or entities in both her outside employment and in her County job or when she uses the same or similar resources in her outside employment as she uses in his County work. Also note that you may not use County time or resources in the performance of your outside employment. *See* County Ethics Code §§ 2-11.1 (g) and (j), Miami-Dade Code 2-11, and Administrative Order 7-1.

Please be advised 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 department director and file related financial disclosure forms annually.

B. 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, 3Ds Gaming, provided that 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. This includes but is not limited to, the contract's enforcement, oversight, administration, amendment, extension, termination or forbearance. Also, you may not work in any County department that would enforce, oversee or administer this contract. *See* County Ethics Code §§ 2-11.1 (c) and (n). Consequently, 3Ds Gaming **may not** enter into contracts with MDFR.

C. Lobbying

Furthermore, 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 3Ds Gaming is seeking. *See* the County Ethics Code at Sec. 2-11.1(m)(1).

D. Exploitation of Official Position

Finally, the County Ethics Code prohibits County employees from exploitation of their official position. This means that you may not use your County position to secure **special privileges or exemptions** with respect to any County contract to which 3Ds Gaming is applying. *See* County Ethics Code § 2-11.1(g).

This opinion is limited to the facts as you presented them to the Commission on Ethics and is limited to an interpretation of the County Ethics Code only and is not intended to interpret state laws. Questions regarding state ethics laws should be addressed to the Florida Commission on Ethics.

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

INQs are informal ethics opinions provided by the legal staff after being reviewed and approved by the Executive Director. INQs deal with opinions previously addressed in public session by the Ethics Commission or within the plain meaning of the County Ethics Code. RQOs are opinions provided by the Miami-Dade Commission on Ethics and Public Trust when the subject matter is of great public importance or where there is insufficient precedent. While these are informal opinions, covered parties that act contrary to the opinion may be referred to the Advocate for preliminary review or investigation and may be subject to a formal Complaint filed with the Commission on Ethics and Public Trust.



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

Detail by Entity Name

Florida Limited Liability Company
3D'S MOBILE GAMING L.L.C.

Filing Information

Document Number	L19000008014
FEI/EIN Number	83-3127462
Date Filed	01/07/2019
Effective Date	01/05/2019
State	FL
Status	ACTIVE

Principal Address

3020 NW 69TH TERRACE
MIAMI, FL 33147

Mailing Address

3020 NW 69TH TERRACE
MIAMI, FL 33147

Registered Agent Name & Address

BLOCKER, DONALD
3020 NW 69 TERRACE
MIAMI, FL 33147

Authorized Person(s) Detail

Name & Address

Title MGR

BLOCKER, DONALD
3020 NW 69TH TERRACE
MIAMI, FL 33147

Title AP

THOMPSON, DASHONYA D
13851 SW 31 STREET
MIRAMAR, FL 33027

Title AP

CRAWFORD, DAWN F
14990 NW 11TH COURT

1400 NW 11TH COURT
MIAMI, FL 33168

Title AP

BLOCKER, DELORES V
3020 NW 69TH TERRACE
MIAMI, FL 33147

Annual Reports

No Annual Reports Filed

Document Images

01/07/2019 -- Florida Limited Liability

[View image in PDF format](#)