

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.

INQ #	County Code at Sec. 2-11.1 Precedent, or other as noted	Requester	Holding
22-01	(d) RQO 19-06  RQO 03-06	Juana Leon - Administrative Services Manager, The Children's Trust	<p>It is recommended that two board members of The Children's Trust Board (TCT) refrain from voting or participating in funding matters directly or indirectly affecting the ELC and United Way where, respectively, they have automatic conflicts of interests as officers within those entities; the entities' funding does not meet the "minor allocation" exception in RQO 19-04; and, recusal is in accordance with COE opinions as well as the heightened appearance of impropriety standard in TCT Policy and Bylaws.</p> <p>However, the remaining board member who is an employee of Miami-Dade College (MDC), which does not receive direct funding from this Resolution but may receive an indirect contribution through one of the educator scholarships, may participate and vote on the Resolution because she has no oversight and reaps no personal benefit from the program; she would not profit or be enhanced by this vote; nor would a special benefit come to her as a result of her vote on this item. (LF)</p>
22-02	(j)  AO 7-1; RQO 16-02; RQO 00-10; INQ 13-28; INQ 21-135; INQ 15-115; INQ 15-49;	Douglas Houhton  Associate Chief of Clinical Operations, Jackson Memorial Hospital Jackson Health	The Ethics Code does not prohibit an employee of the Jackson Health System ("JHS"), from engaging in outside employment as a consultant for Koninklijke Philips N.V. ("Philips"), a JHS vendor that supplies intensive-care monitoring equipment to all JHS intensive care units because the employee has no role or responsibility related to Phillips' contract with JHS, nor does he have any authority or input regarding the brand or

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		System/Public Health Trust	manufacturer of intensive-care monitoring equipment used by JHS. (NAB)
22-03	(g) INQ 17-131 INQ 12-180 INQ 16-76	Mario Morlote  Assistant Director, Administrative Division, RER	The Conflict of Interest and Code of Ethics ordinance does not prohibit the appointment of an interim Assistant Director position in the County's Department of Regulatory and Economic Resources (RER) because of his impending familial relationship with an administrative secretary in the same Division. While the future interaction between the Int. Asst. Dir. and his future sister-in-law does not raise any significant conflict-of-interest concerns as their interaction is limited to purely clerical and administrative tasks, his role in the review of personnel actions and approval of performance evaluations and ratings affecting promotions or advancements of all employees under his supervision, including his future sister-in-law, merits careful consideration in light of state nepotism laws and County policies. (MDP)
22-04	(c)(3) & (d) RQO 07-39 RQO 07-12	Charesse Chester  Northwest 7 <sup>th</sup> Avenue Community Redevelopment Agency	A board member for the Northwest 7th Avenue Community Redevelopment Agency (CRA) has no conflict of interest that would preclude her private company, Creativision, from submitting a bid in response to an Invitation to Quote ("ITQ") from the Miami-Dade County Public Housing and Community Development (PHCD), as the CRA does not oversee, regulate, administer, manage, set policy, or make quasi-judicial decisions regarding PHCD. However, the board member was advised to adhere to the limitations found in the County Ethics Code. (LF)
22-05	(c)  INQ 19-54	Pasco "Pat" Santangelo  Vice President for Public	A member of the Bayfront Park Management Trust (an autonomous municipal entity of the City of Miami) who also acts as Vice President of the Little Haiti FC, Inc. ("LHFC"), does not have a prohibited conflict of interest entering into a contract between LHFC and the City of Miami for

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		Relations Little Haiti FC, Inc.	use of Little Haiti Soccer Park by virtue of being one of LHFC's corporate officers because the contract will never come before the Bayfront Park Management Trust for review or enforcement, and the City of Miami's Conflict of Interest Ordinance does not prohibit such a transaction where the Bayfront Park Management Trust member is only affiliated with the entity contracting with the City. (NAB)
22-06	(c)  H-INQ 16-82	Norma Mims  Immediate Family Member of Robin Mims, Special Projects Administrator 2 of the Department of Transportation and Public Works	An immediate family member of a County employee may contract with the County with the Public Housing and Community Development Department ("PHCD") as a vendor/landlord under the Emergency Rental Assistance Program ("ERAP") because the employee works for the County's Department of Transportation and Public Works, which does not administer the ERAP. (NAB)

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22-07	(j), (k)  RQO 16-02 RQO 12-07 RQO 04-168 RQO 00-10  <i>directed to</i> Miami-Dade County AOs 5-5, 7-1	Janie Salane, Stewardship Manager, Miami-Dade Parks, Recreation and Open Spaces	A Stewardship Manager with Miami-Dade Parks, Recreation, and Open Spaces Department ("PROS") does not have a conflict of interest regarding her employment as a Recreation Aide for the City of Miami Gardens because her outside employment would not impair her independence of judgment in the performance of her County duties as she will not use County time or resources in her outside employment; she will not assist the same clients in both positions; nor will she have any oversight or authority over City or municipal parks in her County position. (LF)
22-08	(c), (j)	Diana Narcisse, County	A County Commission Clerk 2 may contract with the County through her personally owned

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	RQO 16-02 RQO 00-10	Commission Clerk 2, Miami-Dade Clerk of the Courts	company – Baked to Lashed, LLC – to participate in the Mom and Pop Small Business Grant program because her outside employment with Baked to Lashed, LLC is unlikely to give rise to a prohibited conflict of interest, and because the Clerk of the Court is not involved in processing or administering the grant. (NAB)
22-09	(c), (d), (f), (g), (h)  RQO 15-06 INQ 20-132 INQ 20-127  <i>directed to Fla. Stat. § 112.313(3)</i>	Loren Para, Senior Director of Comms, Office of the Mayor	The County Mayor’s Senior Director of Communications is considered “departmental personnel” as defined in the County Ethics Code. Thus, when she marries an executive officer of Brightline Florida (“Brightline”), that executive may no longer contract or transact business with the County individually or through a company in which he has a controlling financial interest. Because the executive in question does not have a controlling financial interest in Brightline, Brightline may still contract with the County. However, the Brightline executive must file with the Clerk of Courts a notice disclosing his employment with Brightline. Additionally, the Senior Director of Communications should recuse herself from involvement in any communications involving Brightline. (JA)
22-10	(c), (j)  RQO 16-02 RQO 12-07 RQO 10-01 RQO 09-16 RQO 04-173 RQO 00-10 INQ 17-232 INQ 16-13  <i>directed to Miami-Dade</i>	Lieutenant Richard Gonzalez, Miami-Dade Fire Rescue  Chief Danny Crespo, Miami-Dade Fire Rescue	A licensed paramedic lieutenant working for the Miami-Dade Fire Rescue Department (“MDFR”) may engage in outside employment as partial owner of Braxton College – a for-profit college offering educational programs in allied health, emergency medical, and fire service professions – and act as its Vice President of Admissions and Compliance without giving rise to a prohibited conflict of interest because the College does not contract with the County or any municipality within the County. However, the College may not contract with MDFR; the MDFR lieutenant may not have any oversight over MDFR training

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	County AOs 5-5, 7-1		vendors; the MDFR lieutenant may not recruit or solicit MDFR employees to attend the College; and, in the event that MDFR staff attend the College, their attendance may not have any effect on their County assessments or promotions. (EA)
22-11	(d) RQO 15-04 INQ 18-251  <i>directed to</i> Fla. Stat. § 112.3143 (1)(d)	Lorenzo Cobiella, Esq., Gastesi, Lopez & Mestre, PLLC	A Councilman of the Town of Miami Lakes does not have a voting conflict with respect to a salary increase for the Town Manager where his wife works for the municipality as a Community Engagement and Outreach Director because she does not directly report to the Town Manager; rather, she reports to the Deputy Town Manager, who also is responsible for her day-to-day work assignments and scheduling, her performance evaluations, her eligibility for compensation increases, promotions, and discipline (as applicable). (JA)
22-12			*Pending*
22-13	(v)  INQ 20-16 INQ 18-258 INQ 17-214 INQ 17-131  <i>directed to</i> Miami-Dade County Resolution No. R-449-14; Miami-Dade County Code § 2-1067	Julie Whiteside, Selection Committee Coordinator, Internal Services Department  Sade Chaney, Research Manager, Office of the Commission Auditor	An employee of the Miami-Dade Aviation Department (“MDAD”) who serves as a member of a Seaport Department Selection Committee does not have a prohibited conflict of interest under the County Ethics Code regarding a respondent to a solicitation due to the respondent’s employment of the selection committee member’s second cousin as a manager, regardless of the committee member’s expressed close familial ties with the cousin.  However, the Procurement Division imposes stricter standards on selection committee members, and COE legal staff have historically recommended that County employees not serve on selection committees where the employee has a familial connection with an owner of one of the

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			<p>responding firms. Thus, the MDAD employee should not serve on the selection committee given the presence of a close familial tie with a high-level employee of the respondent firm, and the paramount importance of integrity and fairness in the procurement process. (MDP)</p>
22-14	<p>(c), (j) INQ 11-162 <i>directed to</i> Miami-Dade County AOs 5-5, 7-1</p>	<p>Jerome Weldon, Firefighter, Miami-Dade Fire Rescue  Danny Cardeso, Fire Division Chief, Miami- Dade Fire Rescue</p>	<p>A firefighter working for the Miami-Dade Fire Rescue Department (“MDFR”) may engage in outside employment as the owner and operator of Jobs Wel-Done 1 LLC (“Jobs”), which provides cleaning services, without giving rise to a prohibited conflict of interest.</p> <p>Additionally, Jobs may contract with the County. However, Jobs may not contract with MDFR, nor may the firefighter/business owner lobby the County to influence a decision regarding any County contract Jobs secures. (EA)</p>
22-15	<p>(d)-vote, (g), (j) RQO 12-03 <i>directed to</i> Miami-Dade County Code §§ 2-1068, 2-1074</p>	<p>Anthony F. DeFillipo, Mayor of the City of North Miami Beach</p>	<p>As a general matter, a municipal mayor may engage in outside employment as a real estate broker and be compensated even if a property’s sale is contingent on subsequent municipal approval of development. However, the mayor may not engage in the outside employment to the extent that any retainer as a broker impedes the full and faithful execution of his public duties. The mayor must abstain from voting on any item that would impact a developer with whom he had a recent business relationship, and the mayor must not influence any matter between his recent real estate clients and the municipality. (JA)</p>
22-16	<p>(j), (k) RQO 16-02 RQO 04-173</p>	<p>Sakinah Nelson, Secretary, Internal</p>	<p>A secretary for the Office of Risk Management and Safety, of the Internal Services Department, may engage in outside employment as a real estate agent for Keller Williams Realty because her</p>

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	RQO 00-10 <i>directed to</i> Miami-Dade County AOs 5-5, 7-1	Services Department  Keith Westin, Manager, Internal Services Department	outside employment would not impair her independence of judgment in the performance of her County duties. (LF)
22-17	(e)  RQO 99-28 INQ 13-55	Shelly-Ann Davidson, Human Resources Manager, Water and Sewer Department	Employees of Miami-Dade Water and Sewer Department may receive and use a promotional offer from “Monstertruckz.com” for one free child’s ticket with the purchase of one adult ticket to a monster truck show because the promotional offer is available to the general public, and so does not constitute a gift; rather, its general availability indicates a sales or marketing strategy. (NAB)
22-18	(c), (j)  <i>directed to</i> Miami-Dade County AO 7-1	Marc Starkey, Correctional Counselor 1, Miami-Dade Corrections and Rehabilitation Department	A County employee may accept a Mom & Pop grant for his privately-owned company as long as his department is not involved in any way in processing or administering the grant, and the employee does not lobby for the grant. (LF)
22-19	(v), (x)  <i>directed to</i> Miami-Dade Code § 2-1067	Julie Whiteside, Selection Committee Coordinator, Internal Services Department  Sade Chaney, Research Manager, Office of the	A member of a County selection committee for a Seaport Department project, does not have a voting conflict even though his former employer, Burns & McDonnell Engineering Company, Inc. (“BMEC”), is a respondent to the solicitation on this project, because he will not be directly affected by the vote, he does not have an enumerated relationship with any entity affected by the vote, he has not worked for BMEC since 1997, he does not have any ownership or other financial interest in BMEC, and he has not

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		Commission Auditor	maintained any business, close social, or other relationship with current BMEC employees. (LF)
22-20	(v), (x)  <i>directed to</i> Miami-Dade Code § 2-1067	Julie Whiteside, Selection Committee Coordinator, Internal Services Department  Sade Chaney, Research Manager, Office of the Commission Auditor	A member of a County selection committee for a Seaport Department project, does not have a voting conflict even though his former employer, Burns & McDonnell Engineering Company, Inc. (“BMEC”), is a member of the responding team on this project, because he will not be directly affected by the vote, he does not have an enumerated relationship with any entity affected by the vote, he has not worked for BMEC since 1997, he does not have any ownership or other financial interest in BMEC, and he has not maintained any business, close social, or other relationship with current BMEC employees. (LF)
22-21	(c), (j)	Shirlyon McWhorter, Board Member, Domestic Violence Oversight Board	A member of the Miami-Dade Domestic Violence Oversight Board (“DVOB”), which is a part of the Office of Community Advocacy (“OCA”), may contract with the County through her personally owned law firm – McWhorter Law, PLLC, – to participate in the Mom and Pop Small Business Grant program because her outside employment is unlikely to give rise to a prohibited conflict of interest, and because the DVOB and the OCA are not involved in processing or administering the grant. (JA)
22-22	(c), (j)  RQO 07-18  <i>directed to</i> Miami-Dade County AOs 5-5, 7-1	Rodrick Billue, Firefighter, Miami-Dade Fire Rescue  Danny Cardeso, Fire Division Chief, Miami-	A firefighter working for the Miami-Dade Fire Rescue Department (“MDFR”) may engage in outside employment as the owner and operator of Grill on Wheelz BBQ & Catering LLC (“GW BBQ”), a food truck and catering service, without giving rise to a prohibited conflict of interest.



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		Dade Fire Rescue	Additionally, GW BBQ may contract with the County. However, GW BBQ may not contract with MDRF, nor may the firefighter/business owner lobby the County to influence a decision regarding any County contract GW BBQ secures. (EA)
22-23	(j) RQO 00-10 RQO 16-02 RQO 17-01  INQ 11-194  <i>directed to</i> Miami-Dade County AOs 5-5, 7-1	Mark Watson, Firefighter, Miami-Dade Fire Rescue  Danny Cardeso, Fire Division Chief, Miami- Dade Fire Rescue	A firefighter working for the Miami-Dade Fire Rescue Department (“MDFR”) may engage in outside employment as the owner and operator of Gulfstream Petroleum Services, Inc., (“GPS”), a company that installs and maintains large fuel tanks and fueling stations, without giving rise to a prohibited conflict of interest.  Additionally, it is noted that COE legal staff previously opined in INQ 11-194 that GPS may contract with the County, but not with MDRF. The firefighter also may not lobby the County to influence a decision regarding any County contract GPS secures. (NAB)
22-24	(c), (j)	Ashley Randle, Correctional Counselor 1, Miami-Dade Corrections and Rehabilitation Department	A County employee may accept a Mom & Pop grant for her privately-owned company as long as her department is not involved in any way in processing or administering the grant, and the employee does not lobby for the grant. (LF)
22-25	(c), (j)	Joyce Johnson Green, Bus Traffic Controller, Department of Transportation	A County employee may accept a Mom & Pop grant for her privately-owned company as long as her department is not involved in any way in processing or administering the grant, and the employee does not lobby for the grant. (LF)

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		and Public Works	

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22-26	(j), (k) RQO 16-02 RQO 12-07 RQO 00-10 RQO 04-168 RQO 10-01 <i>directed to AO 7-1</i>	Eric Somoano, Elevator Inspector, Internal Services Department (ISD)	An Elevator Inspector for ISD has a conflict of interest regarding his County employment and his outside employment as an Elevator Inspector for a private company which is within the regulatory authority of the employee's County department due to the regulatory nature of his County position, and the potential that he or his department would have regulatory authority over the private company, which may impair the employee's independence of judgment in his public capacity. (LF)
22-27	(j) RQO 17-03 RQO 04-173  <i>directed to AO 5-5; AO 7-1</i>	Josenrique Cueto, Deputy Director, Department of Regulatory and Economic Resources	The Deputy Director for the Department of Regulatory and Economic Resources (RER) may serve on the Miami-Dade Expressway Authority Board; however, he must abide by certain limitations and recusals on matters relating to WASD projects requiring RER permitting, due to his spouse's employment with WASD, and any matter that involves an MDX project impacting an abutting County road or when an expressway project may have an environmental impact such that DERM is involved. (JA)
22-28	(c)	Ingrid Gibson, Corrections Technician, Miami-Dade	A County employee may accept a Mom & Pop grant for her privately-owned company as long as her department is not involved in any way in

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		Corrections and Rehabilitation	processing or administering the grant, and the employee does not lobby for the grant. (LF)
22-29	(c)	Nicole Dukes, HR Compensation and Job Analyst, Miami-Dade Human Resources Department	A County employee may accept a Mom & Pop grant for her privately-owned company as long as her department is not involved in any way in processing or administering the grant, and the employee does not lobby for the grant. (NAB)
22-30	(c) RQO 09-22	Makeba Gassant, Member, Small Business Enterprise Goods and Services Advisory Board	A County advisory board member may submit a bid in response to and execute a contract with the County's Internal Services Department (ISD) as long as the board on which she serves does not oversee the contract; she does not make presentations or seek any benefits for herself or others from her board; and she does not vote on any matter where she would be directly affected by the vote while having an enumerated relationship with the entity appearing before the board on which she serves. (EA)
22-31	(j), (k) RQO 16-02 RQO 00-10 RQO 04-168 RWO 12-07 RQO 10-01  <i>directed to AO 7-1</i>	Sauveur Benz Joseph, Parking Attendant Assistant Supervisor, Internal Service Department	A Parking Attendant Assistant Supervisor does not have a conflict of interest regarding his employment at the County and his outside employment as a municipal Parking Enforcement Officer, because his outside employment would not impair his independence of judgment in the performance of his public duties, as he will not assist the same clients or use the same resources in both positions; his work for the City would be performed outside of his County hours; he will not interact with County employees in his outside position; and he has no involvement, oversight,

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			supervision, or authority over the City, its staff, or its traffic enforcement operations in his County position. (LF)
22-32	(s)	Mirza Lane, Executive Director, KFT International	A County vendor's submission of a bid or proposal, by itself, is not considered a procurement activity requiring lobbyist registration because the County developed the terms (specs) and price of the contract and approached the vendor for a quote; vendor submitted a quote; the quote was accepted by the County; and there has been no attempt to change or modify the substantive terms of the proposed transaction by the vendor. (MDP)
22-33	(d)  RQO 15-04 RQO 12-03	Lorenzo Cobiella, Esq., Gastesi, Lopez & Mestre, PLLC	Councilman for the Town of Miami Lakes should abstain from voting on a settlement agreement between the Town of Miami Lakes and the City of Hialeah settling ongoing litigation over right of way jurisdiction on two Town roads, as the Councilman's employment agreement is approved by the Hialeah Mayor and Councilmembers sitting as the governing board for his employer and they have the authority to cancel his employment; and, the City of Hialeah is an entity that will be affected by the vote, then the Councilman might, directly or indirectly, profit or be enhanced by the action of the voting body and may give rise to the appearance of impropriety. (JA)
22-34	(e)  RQO 19-06	Patricia Leal, Program Manager, The Children's Trust Read to	The Children's Trust Read to Learn Book Club Program Manager's receipt of unsolicited items from an author likely seeking to be included in the Book Club partly constitutes a gift. The custom sweater and mask are considered a gift which must be reported according to the County Ethics

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		Learn Book Club	Code, but the book is considered an advertisement, not a gift. (EA)
22-35	(c)	Desant Joseph, Heavy Equipment Technician, Internal Services Department	A County employee is not prohibited from participating in the federally funded Emergency Rental Assistant Program (“ERAP”) administered by the Miami-Dade County Public Housing and Community Development department (“PHCD”), because her County job duties do not involve any administration, oversight, selection, or enforcement of any aspect of the ERAP program. (EA)
22-36	(s) RQO 04-33  <i>directed to</i> Section 252.363(1)(a) and 252.36(6-12) Florida Statutes; State of Florida Executive Orders 22-27 and 22-28	Jorge Ubieta, Supervisor, Development Services Division, Department of Regulatory & Economic Resources (RER)	The act of submitting a request or application to RER for extensions of time for tentative plat approvals from a developer or its representative, which is automatically granted by the government entity and not subject to review, negotiation, or further discussion between the applicant and County personnel, does not constitute lobbying because such activity is akin to a ministerial act rather than lobbying, thereby dispensing with registration. However, if during the process, a permit holder’s representative is engaged in an attempt to influence or persuade County personnel to take a particular course of action or make some determination related to the subject property, then the individual may have to register as a lobbyist per the County Ethics Code. (MDP)
22-37	(v)  RQO 17-04 RQO 10-05  <i>directed to</i> Miami-Dade	Franklin Gutierrez, Selection Committee Coordinator	A member of a selection committee for a Miami-Dade County Aviation project, who previously worked for Burns & McDonnell Engineering Company, Inc. (“BMEC”), a subconsultant to a respondent to this solicitation, may serve on the committee because the business relationship ended amicably decades ago, he has no current ownership interest or other financial interest in the company and he also does not have any business,

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	County Code § 2-1067		<p>close social, or other relationship with any current employee at the company.</p> <p>However, another selection committee member for this project should be excused from service due to an appearance of impropriety because she and her husband maintain a long-standing friendship with the owner of 300 Engineering Group, P.A. (“300 EG”), a subconsultant to of a respondent to this solicitation, and she believes their personal friendship <i>would</i> impair her ability to be fair and impartial when evaluating the respondents to this project. (NAB)</p>
22-38			(Pending)
22-39	(v)  RQO 17-04 RQO 10-05  <i>directed to</i> Miami-Dade County Code § 2-1067	Jorge Vital, Selection Committee Coordinator, Internal Services Department	A member of the selection committee for a Miami-Dade County Aviation project, does not have a voting conflict even though his former employer, T.Y. Lin International (hereinafter “T.Y. Lin”), is a subconsultant to a respondent in the solicitation, because his employment with T.Y. Lin ended over three years ago; he has no current financial or other relationship with his former employer or fellow employees; and there is no appearance of impropriety created by his service on this committee. (LF)
22-40	(j), (k)  RQO 16-02 RQO 12-07 RQO 00-10  <i>directed to AO</i> 7-1	Humberto Aubi, Fire Lieutenant, Miami-Dade Fire Rescue Department	A Fire Lieutenant does not have a conflict of interest regarding his employment at the County and his role as trustee of the H.A. Trust and I.A. Trust because his role as trustee would not impair his independence of judgment in the performance of his County duties. However, as he is seeking to contract with the County through the Trust, he was advised that he may not contract with the County Fire Rescue Department that employs

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			him, and he may not lobby the County for the contract. (LF)
22-41	(c) <i>directed to</i> Section 2-612 (a), City of Miami Code	Olga Bello, Administrative Aide, Office of Commissioner Manolo Reyes	A City employee is not prohibited from participating in the City of Miami's Single Family Rehabilitation Program (SFRP), in a program administered and funded by the City of Miami, Department of Housing and Community Development, because her City job duties do not involve any administration, oversight, selection, or enforcement of any aspect of the SFRP program. (LF)
22-42	(j), (k)  RQO 16-02 RQO 00-10 RQO 17-01 RQO 04-173  <i>directed to</i> AO 7-1; AO 5-5	Gina Green, Pre-trial Services Officer 2, Miami-Dade County Corrections and Rehabilitation Department	A County employee does not have a conflict of interest regarding her employment at the County and her work as an Instructor for Metro Traffic School ("MTS"), because her outside employment would not impair her independence of judgment in the performance of her County duties. (NAB)
22-43	(c)	Martha Garofolo, Procurement Contracting Officer, Miami- Dade County Internal Services Department	No conflict of interest arises out of Corcel Corp.'s bid on a solicitation from the Internal Services Department (ISD) in relation to two Corcel corporate officers serving, respectively, on the Miami-Dade County Living Wage Commission and the Miami-Dade Small Business Enterprise Advisory Board – Goods and Services because those boards would have no occasion to review or consider this solicitation. (NAB)
22-44	(k)  RQO 17-03	Sandra L. Jackson, Human Resources Manager,	A County employee's volunteer activities as Treasurer for Wish Foundation, Inc., a not-for-profit entity, do not constitute outside employment under the County Ethics Code because she did not found Wish Foundation, Inc.; she serves as Treasurer,; she is not responsible for

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		Miami-Dade County Aviation Department	Wish Foundation, Inc.'s day-to-day functioning or activities; she does not receive any form of compensation for her service as Treasurer to the organization; and she does not have significant time commitments as part of her service as the organization's Treasurer. (NAB)
22-45	(w), (g), (e)	Honorable Jose "Pepe" Diaz, Chairperson of the Board of County Commissioners, District 12	The Commissioner and his staff, who are travelling to Spain on a County outbound international trade promotion trip, may allow costs associated with air travel, ground transportation, room and board, and meals to be funded by CAMACOL, as CAMACOL is not a County contractor, vendor, service provider, bidder, or proposer; the purpose for the travel to Spain is a public purpose (i.e. to establish contacts with the host nation with the goal of identifying areas where the host nation and the County can partner in trade and business relationships); and the Commissioner and his staff will be engaged in their official capacities. (JA)
22-46	(c)	Julia Pagey, Electronic System Technician, Miami-Dade Department of Transportation and Public Works	A County employee may contract with the County as a vendor/landlord in the federally funded Emergency Rental Assistant Program ("ERAP"), administered by the Miami-Dade County Public Housing and Community Development Department ("PHCD"), because her County job duties do not involve any administration, oversight, selection, or enforcement of any aspect of the ERAP program. (NAB)
22-47	(j), (k) RQO 16-02 RQO 00-10 RQO 17-01 RQO 04-173	Anthony Goordeen, Train Control Supervisor, Miami-Dade County	A County employee does not have a conflict of interest regarding his employment at the County and his work as part-time vocational instructor with Broward County Public Schools ("BCPS"), because his outside employment would not impair



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	<i>directed to</i> AO 7-1; AO 5-5	Department of Transportation and Public Works	his independence of judgment in the performance of his County duties. (NAB)
22-48	(i), (k), (l) RQO 13-01 RQO 08-36	Keith Carswell, Senior Advisor to City Manager for Economic Development and Venture Miami, City of Miami	A Senior Advisor employed with the City of Miami may invest with online-only financial technology (“fintech”) companies known as neobanks so long as those neobanks do not do business with the City of Miami. These investments do not constitute outside employment because as he will not collect a salary from the neobanks, nor will he perform any services for these companies that would be similar to the services provided by an employee. However, he may be required to file an annual financial disclosure in light of his executive-level position with the City of Miami. (NAB)
22-49	(d) RQO 12-03  <i>directed to</i> Section 2-612 (b), Code of the City of Miami	Victoria Mendez, Esq., City Attorney on behalf of Commissioner Christine King	A Commissioner does not have a voting conflict that would prohibit her consideration and vote on grant funding, space rental, or space lease measures relating to her recent and former employer, The Martin Luther King Economic Development Corporation (MLK EDC), a Florida non-profit involved in revitalization of commercial and residential areas within a specific target zone in the City of Miami. However, in an abundance of caution, and because of her family members’ connections to MLK EDC, the Commissioner is urged consider whether sponsoring and voting on these measures, at this time, may create an appearance of impropriety. (JA)
22-50	(v)  <i>directed to</i> Section 2-1067, Miami-	Justin Espangol, Selection Committee Coordinator,	A member of a County selection committee for a Miami-Dade County Parks, Recreation and Open Spaces Department project does not have a conflict of interest under the County Ethics Code because he does not have a current employment or a financial, personal, or business relationship

INQ #	County Code at Sec. 2-11.1 Precedent, or other as noted	Requester	Holding
	Dade County Code	Miami-Dade County Internal Services Department	with two respondents to this solicitation; nor does he have any personal interest in the contract itself. The fact that a selection committee member has supervisory authority over respondents to a competitive procurement does not create any legal voting conflict of interest for that member nor does his service present any appearance of impropriety. (EA)
22-51	(c)  <i>directed to</i> Section 2-612 (a), City of Miami Code	María Carolina Trujillo Díaz, Special Aide, Office of Commissioner Carollo, City of Miami	Pursuant to County Ethics Code Section (c) (5)(5) and City of Miami Code Section 2-612(a), a City employee working in the Office of a City Commissioner may participate in the First Time Homebuyer Program (“FTH”) administered by the City of Miami Department of Housing and Community Development because the City employee’s duties will not require her to be involved in any way in the selection, administration, or enforcement of the FTH. (MDP)
22-52	(v)  RQO 17-04 RQO 10-05  <i>directed to</i> Miami-Dade County Code § 2-1067	Cristina Amores, Selection Committee Coordinator, Internal Services Department	<p>In an inquiry regarding two members of the selection committee for a Miami-Dade County Department of Transportation and Public Works project, one member has no prohibited conflict to serve on the selection committee; the other member is advised to be excused from this selection committee due to an appearance of impropriety.</p> <p>One selection committee member whose spouse previously worked for CH Perez &amp; Associates (CHPA), may serve on the committee, because CHPA is not a current proposer to this project and no other factors exist indicating that she would be directly affected by the vote, and she does not currently have any of the enumerated relationships with any entity affected by the vote.</p>

INQ #	County Code at Sec. 2-11.1 Precedent, or other as noted	Requester	Holding
			The other selection committee member maintains close personal friendships with the principal owner of BCC Engineering, LLC (“BCC”), and another individual who is a five-percent owner of BCC, a subconsultant to a respondent firm. Consequently, it is recommended that this member be excused from this selection committee due to an appearance of impropriety. (NAB)
22-53	(g), (w), (e)  RQO 15-02  <i>Directed to Sections 112.3148 (3), (4), (7), Florida Statutes, prohibiting gifts from vendors and their representatives.</i>	Honorable Daniella Levine Cava, County Mayor	The Mayor and her staff, who are travelling to Israel to establish contacts with the host nation with the goal of identifying areas where the host nation and the County can partner in trade and business relationships, are doing so consistent with a public purpose and in their official capacities, paid for by the County; and, therefore, the trip is not prohibited by the County Ethics Code. Also, the County contractor funded local event at the airport is not a prohibited travel expense and does not violate the County Ethics Code. Lastly, events or functions occurring in Israel and funded by County vendors may be constitute prohibited travel expenses if these are actually travel related meals. If not, they may constitute permissible and reportable gifts to the County Mayor, Commissioners, and staff under the County Ethics Code. (JA)
22-54	(c)	Henry A. Flores, ITD Enterprise Portfolio Manager	A County employee’s spouse is not prohibited from participating in the Small Business Enterprise (SBE) certification program administered by the Internal Services Department (ISD), because his County job duties do not involve any administration, oversight, selection, or enforcement of any aspect of the SBE program. (LF)

INQ #	County Code at Sec. 2-11.1 Precedent, or other as noted	Requester	Holding
22-56	(j), (k), (c), (g)  <i>directed to AO 7-1</i>	S. Donna Palmer – Special Projects Administrator, Small Business Initiatives (SBI) Section, Miami Dade Water and Sewer Department	A County employee may use the Miami-Dade Public Library facilities for her private enterprise activities (selling books she authored and promoting her speaking services) as long as she uses the standard procedure required by the general public involving space reservation including any forms or fees. The employee is permitted to contract with the County through her private business, but she may not contract with the Miami-Dade County Water & Sewer Department that employs her; she may not lobby the County for the contract; she may not be involved in the contract in any way. (EA)
22-57	(d), (e), (g), (h)  RQO 02-70 RQO 06-05 RQO 19-04 RQO 10-25	Honorable Reggie Leon, Miami Gardens Councilmember and Vice Mayor	The County Ethics Code does not prohibit the Miami Gardens Councilmember and Vice Mayor from serving as an unpaid voluntary director for the Orange Blossom Classic Association, Inc. (OBCA), a Florida non-profit that arranges events to benefit historically black colleges or universities (HBCU's), as it is unlikely that his acceptance of the position would impair his judgment as a voting member of the Miami Gardens Council. The Councilmember may cautiously solicit charitable contributions for OBCA as long as he is careful to avoid any appearance that he is abusing or exploiting his official position as a municipal council member to secure donations for OBCA; he may vote on future OBCA funding measures that may come before the Miami Gardens Council only if he is not the sponsoring member and if the funding is a small portion of an overall municipal budget; and if his voluntary director's position is as an <i>ex officio</i> non-voting member of the OBCA board, then he may vote on measures that impact the entity, but it was recommended that he seek ethics guidance before engaging. (JA)

INQ #	County Code at Sec. 2-11.1 Precedent, or other as noted	Requester	Holding
2022-55	(g)	Heidi Nichols  Sr. Forensic Photographer  Medical Examiner Department	The Miami-Dade County Ethics Code does not prevent a County employee from renting a room in her home to another County employee or any other person. However, the employee was advised not to use her County position to benefit herself as a landlord of her tenant, and vice versa, not to leverage her position as a landlord to secure a benefit in her County position. (LF)
2022-58	(j), (k), (e) RQO 17-03	Michelle Johnson  Faith and Community Leadership Liaison  Mayor's Office	Requester is the Mayor's Faith and Community Leadership Liaison, which includes working with community-based organizations (CBO's), and was previously employed by Concerned African Women, Inc. (CAW) a Florida nonprofit entity and CBO. Ms. Johnson wishes to serve as a voluntary, unpaid director of CAW. The CAW position is not considered conflicting outside employment. But to avoid the appearance of impropriety, Ms. Johnson should not be involved in any aspects of the county grant process with CAW and should avoid direct, targeted solicitations of County vendors and lobbyists on behalf of CAW in order to prevent a County vendor or contractor's contribution to CAW in exchange for a perceived benefit from the County. (JA)
2022-59	(k), (m), (g), (h)	Bassam Moubayed  Chief, Construction Division  MDC Department of Transportation and Public Works (DTPW)	A County division chief working at DTPW is not engaged in outside employment as an unpaid member of the board of directors for the Florida Stormwater Association (FSA), a 501(c)(4) non-profit corporation serving professionals in stormwater management and finance by providing training, technical assistance, advocacy, and legislative relations. (MDP)

INQ #	County Code at Sec. 2-11.1 Precedent, or other as noted	Requester	Holding
2022-60	(v), (n) RQO 11-11	Franklin Gutierrez  Selection Committee Coordinator  Internal Services Department	An alternate Selection Committee member for a Miami-Dade County solicitation whose husband and son are employed by a subconsultant to one of the respondents to the solicitation has a conflict serving in the committee because the committee's recommendation may affect the subcontracting firm in which her husband has a financial interest. Further, there is an appearance of impropriety created given her close familial relationship with two employees of the respondent's subcontractor team. (MDP)
2022-61	(q) RQO 04-33, RQO 02-139 RQO 12-09	Dr. Erica Unz Veterinarian Meows & Purrs Feline Hospital, LLC  Enkelejda Plasari Procurement Contracting Officer 1 Miami Dade County Internal Services Department	A former employee of Miami-Dade County Animal Services Department ("ASD"), who is currently self-employed as a veterinarian and owner/operator of the Florida corporation Meows & Purrs Feline Hospital, LLC ("M&P"), may submit a response to a County solicitation for the provision of veterinary services without violating the Two-Year Rule. However, the Two-Year Rule prohibits her from corresponding with any County officer or employee regarding M&P's response beyond routine administrative inquiries and prohibits her from negotiating with any County personnel regarding the terms of any contract for the provision of veterinary services resulting from her response to said solicitation. (NAB)
2022-62	(e), (w) RQO 02-70 RQO 06-05	Honorable Jose "Pepe" Diaz  Chairman  Miami Dade Board of County Commissioners	The Chairman of the BCC may lead a County effort to solicit charitable contributions for people in and affected by the war in Ukraine pursuant to subsections 2-11.1 (e)(2)(f) and (2)(g) but solicitations of donations from private businesses should be broad based. The Chairman's travel and lodging costs associated with his plans to travel to Poland in his official capacity may be covered by the County or third-party funds, as long as the

INQ #	County Code at Sec. 2-11.1 Precedent, or other as noted	Requester	Holding
			third-party is not a person or party transacting or seeking to transact with the County. (JA)
2022-63	(j), (k) RQO 16-02; RQO 00-10	Cynthia Linder Pre-Trial Services Officer 2  Sherea Blackman Administrative Officer 3  Miami Dade Corrections and Rehabilitation	A Pretrial Services Officer 2 with Miami-Dade Department of Corrections and Rehabilitation does not have a conflict of interest regarding her employment as the owner of Clean-Living Janitorial Team, LLC. because her outside employment would not impair her independence of judgment in the performance of her County duties as there is no overlap between her public duties and outside employment; she will not assist the same clients; she will not use the same resources; her outside employment does not require her to interact with other County employees; and the work would be performed outside your County hours. (LF)
2022-64			Opinion number not assigned
2022-65			Opinion number not assigned
2022-66	(e)  RQO 02-70 RQO 05-119	Julian R. Manduley  IT Contracts & Procurement Manager  Miami Dade County Information and Technology Department	The Miami-Dade County Information Technology Department (“ITD”) may accept an offer from Broadcom Corporation, a County vendor, to provide free training to one County employee of ITD’s choosing in Broadcom’s Mainframe Vitality Program, because the training received will be in furtherance of the County’s official business, and because there is no <i>quid pro quo</i> activity taking place or anticipated by the provision of the free training. Further, because the no-cost provision of the Mainframe Vitality Program is not a “gift” as defined by the County Ethics Code, no disclosure is required under the County Ethics Code. (NAB)
2022-67	(c)	Willi Gudat, Jr.  Immediate family member	The father of a County employee may contract with the County as a vendor/landlord in the federally funded Emergency Rental Assistant Program (“ERAP”), administered by the Miami-Dade County Public Housing and Community

INQ #	County Code at Sec. 2-11.1 Precedent, or other as noted	Requester	Holding
		<p>of Claudia Gudat</p> <p>Police Officer</p> <p>Miami Dade County Police Department</p>	<p>Development Department (“PHCD”), because the County employee’s job duties do not involve any administration, oversight, selection, or enforcement of any aspect of the ERAP program. (NAB)</p>
2022-68	<p>(c), (j),(k)</p> <p>RQO 16-02; RQO 12-07; RQO 00-10;</p>	<p>Eliacin Erland</p> <p>Enrollment Specialist</p> <p>Jackson Health System</p>	<p>A County employee’s management of rental property owned by the County employee’s family member from which the County employee receives income and is memorialized by a property management contract is considered outside employment. A County employee may contract with the County as a vendor/landlord in the federally funded Emergency Rental Assistant Program (“ERAP”), administered by the Miami-Dade County Public Housing and Community Development Department (“PHCD”), because her County job duties do not involve any administration, oversight, selection, or enforcement of any aspect of the ERAP program. (EA)</p>
2022-69	<p>(d)</p> <p>RQO 15-04</p>	<p>Ralph Ventura, Esq.</p> <p>City Attorney</p> <p>City of Sweetwater</p>	<p>There is no broad voting conflict that would prohibit a Sweetwater City Commission member’s participation or vote on a proposed ordinance that would require all new construction of a larger size and density to have vehicle charging stations. The member of the Sweetwater Commission is employed by a publicly traded company that is engaged in the business of electric vehicle charging stations. The member is not a company manager or executive. The passage of the ordinance would not affect the employer in an immediate or substantial manner and would rather have a more speculative effect. (JA)</p>
2022-70	<p>(c)</p>	<p>Miguel Hechavarria</p>	<p>A County employee’s spouse is not prohibited from contracting with the County through his privately-owned business, Fiesta Carousel, Inc. (Fiesta), because his wife’s job duties do not</p>



INQ #	County Code at Sec. 2-11.1 Precedent, or other as noted	Requester	Holding
		Husband of Teresa Hechavarria  Quality Assurance Coordinator  CareerSource South Florida	involve any administration, oversight, selection, or enforcement of any aspect of the contract. (LF)
2022-71	(c)	Rose E. Phara  Certified Nursing Assistant  Jackson Health System	A County employee may contract with the County as a vendor/landlord in the federally funded Emergency Rental Assistant Program (“ERAP”), administered by the Miami-Dade County Public Housing and Community Development Department (“PHCD”), because her County job duties do not involve any administration, oversight, selection, or enforcement of any aspect of the ERAP program (LF).
2022-72	(c)	Eric Chong  Father of Robert Chong  Range Attendant  Miami Dade County Parks, Recreation, and Open Spaces	The father of a County employee may contract with the County as a vendor/landlord in the federally funded Emergency Rental Assistant Program (“ERAP”), administered by the Miami-Dade County Public Housing and Community Development Department (“PHCD”), because his son’s County job duties do not involve any administration, oversight, selection, or enforcement of any aspect of the ERAP program. (EA)
2022-73	(d)	Lorena Bravo, Esq.	There is no voting conflict that would prohibit a Hialeah Councilmember’s participation or vote

INQ #	County Code at Sec. 2-11.1 Precedent, or other as noted	Requester	Holding
	RQO 15-04 RQO 10-20	City Attorney and David Jove, Esq. Assistant City Attorney  City of Hialeah	on a proposed zoning variance sought by the behavioral health hospital, to increase its size when the Councilmember lives in a townhouse development that is just west of the hospital. The Councilmember's interest did not reach the threshold of 1% of the size of the class that would generally create a voting conflict. It does not appear that the variance will significantly change the character of the official's neighborhood. The hospital is located alongside the Palmetto Expressway. Any financial impact to the member would be remote or speculative. (JA)
2022-74	(s)(2),  (g)	Ms. Katy Sorenson  Former Miami-Dade County Commissioner for District 8  Advisory Board Member and the Chairperson of the Building Better Communities Bond Program's Citizens' Advisory Committee (CAC)  Founder, President and CEO of the Good Government Initiative at the University of Miami	Exceptions in Section 2-11.1(s) of the County Ethics Code allow a citizen to appear before the Board of County Commissioners in self-representation to express opposition to the expansion of the current urban develop boundary line, without registering as a lobbyist. It is recommended that she clarify in her presentation that she is speaking on her own behalf and not on behalf of any organization or group. (JA)

INQ #	County Code at Sec. 2-11.1 Precedent, or other as noted	Requester	Holding
2022-75	(g) RQO 05-06	Honorable Roberto Martell Mayor of the Town of Medley	The County Ethics Code does not prohibit the Mayor of the Town of Medley from endorsing the candidacy of another person for County Court Judge and he may use his official title as Mayor as long he does not use any municipal resources in the endorsement. (JA)

INQ #	County Code at Sec. 2-11.1, Precedent, or other as noted	Requester	Holding
22-76	(k) RQO 17-03	Harry Elden, Accountant II, Miami-Dade Port of Miami (Seaport)	An Accountant II for the Miami-Dade Port of Miami (Seaport) is not engaged in outside employment by volunteering as Treasurer for Ballet Etudes of South Florida, Inc. (“Ballet Etudes”), a not-for-profit corporation founded by his spouse and currently operated by his daughter, because he is not responsible for Ballet Etudes’ day-to-day functioning or activities, does not receive compensation for his services, and does not have significant time commitments as part of his service as Treasurer. (LF)
22-77	(d) RQO 19-06 RQO 15-04	Juana Leon, Administrative Services Manager, The Children’s Trust	Board members of The Children’s Trust (“TCT”) did not have a voting conflict concerning a resolution to authorize the negotiation and execution of a final contract renewal with Miami-Dade College (“MDC”) for The Children’s Trust Books for Free program because the TCT board members did not have an enumerated relationship with any entity affected by the resolution, nor would any of the board members profit from, be enhanced by, or receive any special benefit from the vote. (LF)
22-78	(j), (k)	Luis Requejo, Airport	An Airport Operations Agent for the Miami-Dade Aviation Department may engage in outside

INQ #	County Code at Sec. 2-11.1, Precedent, or other as noted	Requester	Holding
	RQO 17-01 RQO 16-02 RQO 09-16 RQO 04-173 RQO 00-10  <i>directed to</i> Miami-Dade County AOs 5-5, 7-1	Operations Agent, Miami- Dade Aviation Department  Jonathan Spicer, Airport Operations Supervisor, Miami-Dade Aviation Department	employment as a cardiopulmonary resuscitation (“CPR”) and First Aid instructor for his privately owned and operated company because his outside employment would not impair his independence of judgment in the performance of his County duties. (NAB)
22-79	(j), (k)  RQO 16-02 RQO 00-10  <i>directed to</i> Miami-Dade County AOs 5-5, 7-1	Elizabeth Lubin, Treatment Plant Operator 1, Miami-Dade Water and Sewer Dept  Oman Lopez, Treatment Plant Supervisor, Miami-Dade Water and Sewer Dept	A Treatment Plant Operator 1 for the Water and Sewer Department may engage in outside employment as a baker for her privately owned and operated company because her outside employment would not impair her independence of judgment in the performance of her County duties. (LF)
22-80	(v), (x)  <i>directed to</i> Miami-Dade Code § 2-1067	Amado Gonzalez, Selection Committee Coordinator, Internal Services Department  Sade Chaney, Research	Members of a County selection committee for a Miami-Dade Aviation Department project do not have a voting conflict, even though their respective former employers are subconsultants of a respondent to the solicitation because the selection committee members will not be directly affected by the vote, they each do not have an enumerated relationship with an entity affected by the vote, and they have not maintained any business, close social, or other relationships with their respective former employers. Additionally,

INQ #	County Code at Sec. 2-11.1, Precedent, or other as noted	Requester	Holding
		Manager, Office of the Commission Auditor	the Reverse Two-Year Rule would not apply to either selection committee member because they left their respective former employment more than two years ago. (MDP)
22-81	(j), (k)  RQO 17-01 RQO 16-02 RQO 12-07 RQO 04-173 RQO 04-168 RQO 00-10  <i>directed to</i> Miami-Dade County AOs 5-5, 7-1	Alejandra Longa, Veterinary Technician, Miami-Dade Animal Services Dept  Susan Marazita, Administrative Officer 2, Miami-Dade Animal Services Dept	A Veterinary Technician for the Miami-Dade Animal Services Department (“ASD”) may engage in outside employment as a Relief Veterinary Technician for Meows and Purrs Feline Hospital, LLC (“M&P”), a County vendor, because there will be no overlap between her public duties and outside employment: the outside employment will take place at a different facility; her outside employment will not require her to interact with ASD staff; M&P will provide its own veterinary supplies and will use different medications, protocols, and database software; her outside employment will be performed outside of her County work hours; ASD and M&P serve different pet populations and so typically provide different types of services; and the County employee will not have any authority to enforce, oversee, or administer any contracts between ASD and M&P, nor will she supervise anyone with said authority. (NAB)
22-82	(j), (k)  RQO 16-02 RQO 12-11 RQO 08-31 RQO 05-15 RQO 00-10  <i>directed to</i> Miami-Dade County AOs 5-5, 7-1	Daniel Rotenberg, Real Estate Division Director, Miami-Dade Internal Services Dept  Veronica Brown, Assistant Director, Miami-Dade	A Real Estate Development Division Director for the Miami-Dade Internal Services Department may engage in outside employment as co-owner and operator of his privately owned and operated real estate investment firm. Because he will not use his Florida real estate license to engage in this outside employment and all of the firm’s currently owned properties are outside of Miami-Dade County, his outside employment would not impair his independence of judgment in the performance of his County duties. (EA)

INQ #	County Code at Sec. 2-11.1, Precedent, or other as noted	Requester	Holding
		Internal Services Dept	
22-83	(k)  RQO 17-03	Ronald Tookes, Police Officer, Miami-Dade Police Department	A Miami-Dade County Police Officer is not engaged in outside employment when he serves as the President of the Richmond-Perrine Optimist Club, a not-for-profit entity, because: he did not found the organization; he does not have a significant managerial role in the organization; the organization has a separate executive director responsible for its day-to-day operations; he serves on a volunteer basis with no monetary compensation; and, he does not have significant time commitments as part of his service as President beyond attending a monthly board meeting. Because he is not engaged in outside employment, he is not required to annually report his activities as outside employment or seek annual supervisor approval. (LF)
22-84	(v), (x)  <i>directed to</i> Miami-Dade Code § 2-1067	Jorge Vital, Selection Committee Coordinator, Internal Services Department  Sade Chaney, Research Manager, Office of the Commission Auditor	An alternate member of a County selection committee for a Miami-Dade Department of Transportation and Public Works project does not have a voting conflict, even though his former employer is a subconsultant of a respondent to the solicitation, because the alternate selection committee member will not be directly affected by the vote, he does not have an enumerated relationship with an entity affected by the vote, and he has not maintained any business, close social, or other relationship with his former employer. Additionally, the Reverse Two-Year Rule would not apply to the alternate selection committee member because he left his former employment more than two years ago. (MDP)
22-85	(c)	Jeffery Heredia, Bus Operator,	A County employee may contract with the County as a vendor/landlord in the federally funded

INQ #	County Code at Sec. 2-11.1, Precedent, or other as noted	Requester	Holding
		Miami-Dade County Department of Transportation and Public Works	Emergency Rental Assistance Program (“ERAP”), administered by the Miami-Dade County Public Housing and Community Development Department (“PHCD”), because the County employee’s job duties do not involve any administration, oversight, selection, or enforcement of any aspect of the ERAP. (NAB)
22-86	(j), (k)  RQO 17-01 RQO 16-02 RQO 00-10  <i>directed to</i> Miami-Dade County AOs 5-5, 7-1	Luis Robainas, Cashier 1, Miami-Dade Water and Sewer Department  Cristobal Andrades, Accountant 3, Miami-Dade Water and Sewer Department	A Cashier 1 for the Miami-Dade Water and Sewer Department may engage in outside employment as a Part-Time Head Cashier at The Home Depot because his outside employment would not impair his independence of judgment in the performance of his County duties. (EA)
22-87	(v), (x)  <i>directed to</i> Miami-Dade Code § 2-1067	Saba Musleh, Selection Committee Coordinator, Internal Services Department  Sade Chaney, Research Manager, Office of the Commission Auditor	A member and an alternate member/technical advisor of a County selection committee for multiple Miami-Dade County Departments Requesting Proposals for Maintenance and Repair Services do not have voting conflicts, even though the member managed a County Project involving a Respondent to the solicitation, and a former employer of the alternate member/technical advisor is a respondent to the solicitation, because neither the member nor the alternate member/technical advisor will be directly affected by the vote, nor do they have an enumerated relationship with an entity affected by the vote, and they have not maintained any business, close social, or other relationships with the Respondent in question. The Reverse

INQ #	County Code at Sec. 2-11.1, Precedent, or other as noted	Requester	Holding
			<p>Two-Year Rule would not apply to the alternate selection committee member because he left his former employment more than two years ago.</p> <p>Finally, however, due to the sensitivity of the procurement process and the expressed concern and apprehension of the selection committee member in remaining fair and impartial, it was recommended that he be excused from service as a member of the selection committee. (MDP)</p>
22-88	<p>(e), (w)</p> <p><i>directed to Florida Statutes § 112.3148</i></p>	<p>Gabriel Paez, Community Advocacy Program Officer 1, Miami-Dade County Board of County Commissioners</p>	<p>A Community Advocacy Program Officer 1 for the Miami-Dade County LGBTQ Advisory Board may accept a prize/gift of a two-night hotel stay that he won at virtual event that he attended as part of his County work because the entity sponsoring the prize/gift was not a County vendor, the prize/gift was not awarded to him in exchange for any official duty or act performed by him in relation to his official duties, the prize/gift was equally available to all event attendees, and he did not garner any advantage in winning the prize/gift due to his County position. However, because the value of the prize/gift is over \$100.00, he must file a gift disclosure with the Clerk of the Board. (NAB)</p>
22-89	<p>(g)</p> <p>RQO 99-24</p> <p><i>directed to County Manager's Memorandum of June 11, 2007; Fla. Stat. § 112.3135</i></p>	<p>Jimmy Morales, Chief Operations Officer, Miami-Dade County</p>	<p>The County Ethics Code does not prohibit a husband and wife from serving as two of the four Deputy Directors for the Miami-Dade Water and Sewer Department because they have different work assignments that do not overlap and neither is in a position to supervise or evaluate the other's work product.</p> <p>However, the requestor was directed to the County's administrative policies regarding nepotism. (JA)</p>



INQ #	County Code at Sec. 2-11.1, Precedent, or other as noted	Requester	Holding
22-90	(e), (g), (w)	Mayor Danielle Levine Cava, Miami-Dade County	<p>The County Mayor may travel to Qatar at the invitation and expense of the Qatari government in order to meet with government, business, and cultural officials about their hosting of the 2022 World Cup with an eye toward this jurisdiction's bid to host the 2026 World Cup without giving rise to a conflict of interest because the proposed travel is done in the County Mayor's official capacity for a public purpose, and because the Qatari government is not a County contractor.</p> <p>Furthermore, because the travel is undertaken in the County Mayor's official capacity in the performance of a public duty, the payment of the travel costs by the Qatari government do not constitute a reportable gift, although the Ethics Commission encourages reporting said costs to promote transparency and disclosure. (JA)</p>
22-91	(j), (k) RQO 16-02 RQO 04-173 RQO 00-10 <i>directed to</i> Miami-Dade County AOs 5-5, 7-1	Carolina Castrillon, Manager of PROS Capital Improvement, Miami-Dade Parks, Recreation, and Open Spaces Department	A Manager of Capital Improvement for the Miami-Dade County Parks, Recreation, and Open Spaces Department ("PROS") may engage in outside employment as President of Castina Construction, Inc., her privately owned business that provides general contractor and construction management for residential projects, because her outside employment would not impair her independence of judgment in the performance of her County duties. (LF)
22-92	(d) RQO 19-06 RQO 19-04 RQO 15-04	Juana Leon, Administrative Services Manager, The Children's Trust	Three board members of The Children's Trust ("TCT") have an automatic prohibited voting conflict concerning a TCT Resolution to fund Family Neighborhood Support Partnerships ("FNSP"), which offer support for children, youth, and their families experiencing challenges

INQ #	County Code at Sec. 2-11.1, Precedent, or other as noted	Requester	Holding
	<p><i>directed to</i> The Children’s Trust (“TCT”) Conflict of Interest and Code of Ethics § III(A)(1) and TCT Bylaws, Art. VI, § 3</p>		<p>that limit their health, social, educational, and economic potential, because the TCT board members each have an enumerated relationship (officer and/or director) with an entity receiving funds under the Resolution.</p> <p>The remaining TCT board members do not have a voting conflict concerning the FNSP Resolution because, although they are affiliated with in-kind partners of the FNSP, they do not have an enumerated relationship with any entity receiving funding from or directly affected by the Resolution, nor would any of the board members profit from, be enhanced by, or receive any special benefit from the vote. (LF)</p>
22-93	<p>(d) RQO 19-06 RQO 15-04</p> <p><i>directed to</i> The Children’s Trust (“TCT”) Conflict of Interest and Code of Ethics § III(A)(1) and TCT Bylaws, Art. VI, § 3</p>	<p>Juana Leon, Administrative Services Manager, The Children’s Trust</p>	<p>Three board members of The Children’s Trust (“TCT”) each have an automatic prohibited voting conflict concerning a TCT Resolution to fund innovative services to pilot or test new ideas or methods that have the potential to advance TCT’s mission, because each of the three TCT board members has an enumerated relationship (officer and/or director) with an entity receiving funds under the Resolution. (NAB)</p>