

August 31, 2007

Larry and Delicia Green
Creative Mind Builders, Inc.
1260 NW 155 Lane, #106
Miami, FL 33169

Re: **INQ 07-141**

Larry and Delicia Green may register Creative Mind Builders, Inc., as a County vendor, as long as Creative Mind Builders, Inc. does not contract with the Police Dept. and/or is not supervised by the Police Dept.

Miami-Dade County Conflict of Interest & Code of Ethics at § 2-11.1 (c)

Dear Mr. and Mrs. Green:

In correspondence to our office on August 29 and 30, 2007, you said that you wish to register your business, Creative Mind Builders, Inc., as a County vendor.

The facts as we understand them are as follows:

1. Delicia Green works as Police Records Specialist I for the Miami-Dade County Police Department.
2. Ida Mae Green, Mr. Green's mother, also works for the Miami-Dade County Police Department as a school crossing guard.
3. Creative Mind Builders, Inc., is a staffing agency incorporated by Larry Green, with Delicia Green and Ida Mae Green as officers.
4. Larry and Delicia Green are seeking to register Creative Mind Builders, Inc., with the County.

It is the opinion of the Ethics Commission that Creative Mind Builders, Inc., may contract with the County as long as—

1. Entering into the contract will not interfere with the full and faithful discharge of Delicia Green's duties or Ida Mae Green's duties to the County.
2. Delicia Green and Ida Mae Green will not participate in determining the contract requirements.
3. Delicia Green and Ida Mae Green will not participate in awarding the contract.

4. Delicia Green's and Ida Mae Green's job responsibilities and job descriptions will not require them to be involved in the contract in any way including, but not limited to, its enforcement, oversight, administration, amendment, extension, termination or forbearance.
5. Delicia Green and Ida Mae Green will not work in the County department that will enforce, oversee or administer the contract.

If any of the facts you have presented change, or if you have further questions, please do not hesitate to contact our office at 305 579-2594.

Sincerely,

VICTORIA FRIGO
Staff Attorney