

December 24, 2007

Mildred Brookin
Siaperm Investment, Inc.
8210 NW 199th St.
Miami, FL 33015

Via First Class Mail and Fax at 305 829-8623

Re: INQ 07-188, Miami-Dade Co. Conflict of Interest & Code of Ethics
at §§ 2-11.1 (c) & (g)

Siaperm Investment, Inc., may register as a County vendor, *as long as—*

- Siaperm Investment, Inc., does not contract with the Miami-Dade Building Code Compliance Office (BCCO);
- Siaperm Investment, Inc., is not supervised by the BCCO or Valerie L. Moore;
- Valerie L. Moore does not use or attempt to use her position in the BCCO to secure special privileges or exemptions for Siaperm Investment, Inc.;
- Registering as a County vendor does not conflict with any other policies that may have been established for employees of the BCCO.

Dear Ms. Brookin:

In correspondence to our office on December 20, 2007, you said that you wish to register your business, Siaperm Investment, Inc., as a County vendor.

The facts as we understand them are as follows:

1. Your daughter, Valerie L. Moore, works for the Miami-Dade County Building Code Compliance Office (BCCO) as an Administrative Officer 2.
2. Siaperm Investment, Inc., which is owned by you, deals in real estate investments and commodities.
3. Siaperm Investment, Inc., is seeking to register as a vendor in order to do business with the County.

It is the opinion of the Ethics Commission that Siaperm Investment, Inc., may contract with the County as long as entering into the contract will not interfere with the full and faithful discharge of Valerie L. Moore's duties to the County. This includes the requirement that Valerie L. Moore not participate in determining the contract requirements or in awarding the

contract. Additionally, none of Valerie L. Moore's job responsibilities and job descriptions may require her to be involved in the contract in any way including, but not limited to, its enforcement, oversight, administration, amendment, extension, termination, or forbearance. Finally, Valerie L. Moore may not work in the County department that will enforce, oversee, or administer the contract.

This opinion is limited to the facts as you presented them to the Commission on Ethics regarding conflicts under Subsections (c) and (g) of the Miami-Dade Conflict of Interest and Code of Ethics Ordinance only. Other conflicts, based on directives from the BCCO or under state law, may apply. If you have additional questions regarding possible conflicts based on directives of the BCCO, contact the BCCO director or the County Manager's Office. Questions regarding the state ethics laws should be addressed to the State of Florida Commission on Ethics.

If any of the facts you have presented change, or if you have further questions, please do not hesitate to contact me at 305 350-0601.

Sincerely,

VICTORIA FRIGO
Staff Attorney

copies: Herminio F. Gonzalez, Director
Miami-Dade Co. Building Code Compliance Office
140 W. Flagler St., Suite 1603
Miami, FL 33130

Valerie L. Moore, Administrative Officer, 2
Miami-Dade Co. Building Code Compliance Office
140 W. Flagler St., Suite 1603
Miami, FL 33130