

February 7, 2008

Via First Class Mail
and
Fax at 305.485.5959

Robert E. Sanchez, Vice-President
United Screening Services Corp.
8700 West Flagler St., Suite 290
Miami, FL 33143

Re: INQ 08-13 County Vendor Approval

Dear Mr. Sanchez:

In a letter to our office dated February 4, 2008, you asked if United Screening Services Corp. may register as a county vendor based on the following facts:

1. Javier Albite is employed as a Police Officer with the Miami-Dade County Police Department.
2. Albert Albite, the president of United Screening Services, is the brother of Javier Albite.
3. Lourdes Sanchez, the secretary of United Screening Services, is the sister of Javier Albite.

Based on the sibling relationship, United Screening Services Corp. does not need permission from the Miami-Dade County Commission on Ethics to become a pre-approved County vendor. The County Ethics Code at Section 2-11.1 (c)(1) prohibits county employees and their *immediate family* members from transacting business with their own county departments. "Immediate family" is defined at Section 2-11.1 (b)(9) as "spouse, parents, and children" only. Brothers and sisters are not included as immediate family members.

You are advised, however, that a contract between United Screening Services Corp. and Miami-Dade County should not interfere with the full and faithful discharge of Officer Albite's duties to the County. Additionally, an appearance of impropriety might occur if Officer Albite were to participate in determining or awarding your contract or become involved in any aspect of the contract, including its enforcement, oversight, administration, amendment, extension, termination, or forbearance.

If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

VICTORIA FRIGO
Staff Attorney