

February 22, 2008

Via First Class Mail
and
Fax at 305.949.7813

Rodlyn Anderson, Executive Director
SilvaPlex, LLC
1964 NE 148th St.
North Miami, FL 33181

Re: INQ 08-23 County Vendor Approval
Miami-Dade Co. Conflict of Interest & Code of Ethics at §§ 2-11.1
(c) & (g)

SUMMARY: SilvaPlex, LLC, may register as a County vendor, *as long as—*

- SilvaPlex, LLC, *does not contract with Jackson Memorial Hospital*, a county agency;
- SilvaPlex, LLC, is not supervised by Rodlyn Anderson;
- Rodlyn Anderson does not use or attempt to use her position as a Registered Nurse at Jackson Memorial Hospital to secure special privileges or exemptions for SilvaPlex, LLC;
- Registering as a County vendor does not conflict with any other policies that may have been established for employees of Jackson Memorial Hospital.

Dear Ms. Anderson:

In correspondence to our office from February 20-21, 2008, you asked if SilvaPlex, LLC, may register as a county vendor. The facts as we understand them are as follows: You, Rodlyn Anderson, are employed as a Registered Nurse with Jackson Memorial Hospital, a county agency. You are also the Executive Director and 50% owner of SilvaPlex, LLC, a registered Florida corporation that sells hand-sanitizing products.

It is the opinion of the Ethics Commission that SilvaPlex, LLC, may contract with the County as long as entering into the contract will not interfere with the full and faithful discharge of your duties to the County.

This includes the requirement that you, Rodlyn Anderson, 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 including, but not limited to, its enforcement, oversight, administration, amendment, extension, termination, or forbearance. Finally, SilvaPlex, LLC, may not contract with the County department that employs you, *i.e.*, Jackson Memorial Hospital, nor with any county department which would allow you to influence the enforcement, oversight, or administration of 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 Jackson Memorial Hospital or under state law, may apply. If you have additional questions regarding possible conflicts based on directives of Jackson Memorial Hospital, contact the Hospital director, the Public Health Trust, 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