



Via First Class Mail
and
email at TravelingAngels@ymail.com

June 2, 2010

ETHICS COMMISSIONERS

Kerry E. Rosenthal, CHAIRPERSON
Dawn E. Addy, VICE CHAIRPERSON
Judge Seymour Gelber

ROBERT A. MEYERS
EXECUTIVE DIRECTOR

MICHAEL P. MURAWSKI
ADVOCATE

ARDYTH WALKER
STAFF GENERAL COUNSEL

M. Kevin Willis, CEO
Traveling Angels Security, Inc.
8365 NE 2nd Ave., Room 203
Miami, FL 33138

Re: INQ 10-99, Contract limitations for Traveling Angels Security, Inc.

Dear Mr. Willis:

In correspondence to our office on May 26, 2010, you asked if any ethics conflicts prevent your privately owned company, Traveling Angels Security, Inc., from entering into a contract with Miami-Dade County.


THE FACTS as you presented them are that Traveling Angels Security, Inc., a for-profit corporation owned by you, provides guard services and training. Your daughter, Corenthia Willis, is employed by the Miami-Dade County Department of Corrections & Rehabilitation as a Correctional Officer.

IT IS THE OPINION of the Ethics Commission staff that Traveling Angels Security, Inc., may enter into contracts with the County, but not with the Department of Corrections & Rehabilitation because of your daughter's employment with the Department of Corrections & Rehabilitation.

THE COUNTY ETHICS CODE at Section 2-11.1 (c) allows your company to do business with Miami-Dade County as long as the contract does not interfere with the full and faithful discharge of your daughter's duties to the County. This includes the condition that Corenthia Willis not participate in determining the contract requirements or in awarding the contract. Additionally, none of Corenthia Willis'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, Corenthia Willis may not work in any 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 me at 305 350-0601.

Sincerely,


VICTORIA FRIGO
Staff Attorney

copy: Corenthia Willis
Miami-Dade County Dept. of Corrections & Rehabilitation
1321 NW 13th St.
Miami, FL 33125-1603