



Via First Class Mail and
email at stephencilfordmd@gmail.com

May 29, 2013

ETHICS COMMISSIONERS

Dawn Addy, CHAIR
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EXECUTIVE DIRECTOR
GENERAL COUNSEL

MICHAEL P. MURAWSKI
ADVOCATE

MIRIAM S. RAMOS
DEPUTY GENERAL COUNSEL

Stephen J. Clifford, MD
12996 West Dixie Highway
North Miami, FL 33161

RE: Prohibition on contracting with the PHT
Miami-Dade County Code at Secs. 2-11.1 (c)(1), (c)(2), and (d)
INQ 13-127

Dear Dr. Clifford:

If you were to be employed as a physician by the Jackson Health System (JHS) and the Public Health Trust (PHT), you would be prohibited from renting office space and selling medical equipment to the JHS and PHT under the County Ethics Code at Secs. 2-11.1 (c)(1), (c)(2), and (d).

We recognized that you have anticipated distancing yourself from any involvement in contracts with the JHS and PHT by placing ownership of your office space with a corporation, which you and your spouse jointly own,¹ and by employing independent third parties to evaluate the proposed rental agreement and to appraise the value of the equipment.

Nevertheless, you are prohibited from entering into any contract or transacting any business with the JHS and PHT, *directly or indirectly*, through a business entity in which you or an immediate family member has a controlling financial interest.

The PHT may grant a waiver of this prohibition with a 2/3 vote, if the PHT finds that it is in the best interest of the PHT and the County. The PHT staff should be able to assist you in placing your request for a waiver on the PHT agenda.

Sincerely,

VICTORIA FRIGO
Staff Attorney

copy: Gino R. Santorio, VP, JHS Ambulatory Care Services and Operations, at
Gino.Santorio@jhs-miami.org

¹ Cliffs on the Highway, LLC, jointly owned by Stephen and Deborah Clifford.