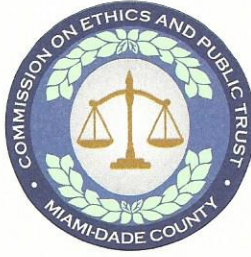


# MIAMI-DADE COMMISSION ON ETHICS AND PUBLIC TRUST

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GENERAL COUNSEL  
Michael P. Murawski  
ADVOCATE  
Miriam S. Ramos  
DEPUTY GENERAL COUNSEL

Via First Class Mail and  
email at [JUAN@INDTS.com](mailto:JUAN@INDTS.com)

January 16, 2014

Mr. Juan C. Restrepo  
Industrial Trading Solutions  
SW 13 Street, #4410  
Miami, FL 33130

Re: INQ 14-04, Limitations on Doing Business with the County

Dear Mr. Restrepo:

On January 8, 2014, you asked about limitations in doing business with the County through your privately owned company, Industrial Trading Solutions Corp. Your spouse, Nathalia Salas-Restrepo, is employed by the Miami Dade Parks and Recreation Department as a PROS Special Events Coordinator.

The County Ethics Code at Secs. 2-11.1 (c) (2) and (d) allows you to enter into a contract, individually or through a firm, with Miami-Dade County, as long as the contract does not interfere with the full and faithful discharge of your spouse's duties to the County. This means that your spouse, Nathalia Salas-Restrepo shall not participate in determining the contract requirements or in awarding the contract. Additionally, none of Ms. Salas-Restrepo's job responsibilities and job descriptions shall 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. In your case, this means that Industrial Trading Solutions Corp. shall not enter into contracts with the Miami Dade County Parks and Recreation Department.

This opinion construes the Miami-Dade County Ethics Code as it applies to County employee-vendors at Secs. 2-11.1 (c)(2) and (d) only. It is not applicable to any conflicts under other sections of the County Code or to issues related to state or federal laws.

If any of the facts you have presented change or if you have further questions, please feel free to contact me at 305 350-0638.

Sincerely,

Gilma Diaz-Greco  
Staff Attorney

***Please submit this letter to the Procurement Management Services Division with your Relatives of County Employees Wishing to Register as County Vendors application. The Ethics Commission does not submit this letter on your behalf.***

**Diaz-Greco, Gilma M. (COE)**

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Thursday, January 16, 2014 3:08 PM  
**To:** 'juan@indts.com'  
**Subject:** RE: FW: Request for Conflict of Interest Opinion  
**Attachments:** INQ 14-04 Restrepo.pdf

Dear Mr. Restrepo:

Attached is the Limitations on Doing Business with the County Ethics Opinion letter. Please note that it indicates that, as a relative of a County employee, the code does not prohibit you from entering into a contract with the County as long as it does not interfere with the County employee's faithful discharge of duties to the County. Please note the limitation that neither you or your company may enter into contracts with the Miami Dade County Parks and Recreation Department, the department in which your spouse Nathalia Salas-Restrepo works. I will send you the original letter via regular mail.

Please do not hesitate to contact me if you have further questions.

Sincerely,

Gilma (Mimi) Diaz-Greco  
Staff Attorney



Miami-Dade Commission on Ethics and Public Trust  
19 W. Flagler Street, Suite 820  
Miami, FL 33130  
Tel: (305) 579-2594  
Fax: (305) 579-0273  
[gdiazgr@miamidade.gov](mailto:gdiazgr@miamidade.gov)  
[www.facebook.com/MiamiDadeEthics](http://www.facebook.com/MiamiDadeEthics)

*Miami-Dade County is a public entity subject to Chapter 119 of the Florida Statutes concerning public records. E-mail messages are covered under such laws and thus subject to disclosure.*

-----Original Message-----

From: [juan@indts.com](mailto:juan@indts.com) [<mailto:juan@indts.com>] On Behalf Of Juan Gonzalez (INDTS)  
Sent: Wednesday, January 08, 2014 11:04 PM  
To: Diaz-Greco, Gilma M. (COE)  
Subject: Re: FW: Request for Conflict of Interest Opinion

Gilma, how are you?

Thank you for the information

Attached you will find the completed form

Please let me know if I can provide you with additional information

Juan

On Wed, Jan 8, 2014 at 9:56 AM, Diaz-Greco, Gilma M. (COE) <GDIAZGR@miamidade.gov> wrote:

>

>

> -----Original Message-----

> From: Diaz-Greco, Gilma M. (COE)

> Sent: Tuesday, January 07, 2014 1:49 PM

> To: Murawski, Michael P. (COE)

> Subject: RE: Request for Conflict of Interest Opinion

>

> Dear Mr. Restrepo,

>

> I am attaching the application for a County employee relative seeking to become a County Vendor. It includes instructions for you to follow. I will review the form when I receive it and respond via letter thereafter.

>

> Best regards,

> Gilma (Mimi) Diaz-Greco

> Staff Attorney

> Miami-Dade Commission on Ethics and Public Trust

> 19 W. Flagler Street, Suite 820

> Miami, FL 33130

> Tel: (305) 579-2594

> Fax: (305) 579-0273

> [gdiazgr@miamidade.gov](mailto:gdiazgr@miamidade.gov)

> [www.facebook.com/MiamiDadeEthics](http://www.facebook.com/MiamiDadeEthics)

>

> Miami-Dade County is a public entity subject to Chapter 119 of the Florida Statutes concerning public records. E-mail messages are covered under such laws and thus subject to disclosure.

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> -----Original Message-----

> From: Murawski, Michael P. (COE)

> Sent: Monday, January 06, 2014 10:37 AM

> To: Diaz-Greco, Gilma M. (COE)

> Subject: FW: Request for Conflict of Interest Opinion

>

>

>

> -----Original Message-----

> From: Ethics (COE)  
> Sent: Friday, January 03, 2014 4:46 PM  
> To: Diaz-Greco, Gilma M. (COE)  
> Subject: FW: Request for Conflict of Interest Opinion  
>  
> Mimi:  
>  
> Not sure if you've seen this or not  
>  
> -----Original Message-----  
> From: Juan Restrepo (INDTS) [mailto:juan@indts.com]  
> Sent: Monday, December 30, 2013 4:37 PM  
> To: Ethics (COE)  
> Subject: Request for Conflict of Interest Opinion  
>  
> Dec. 30th, 2013  
>  
> RE:  
> Conflict of Interest Opinion  
> Industrial Trading Solutions  
> FEIN #: 27-0780680  
>  
> Miami-Dade Ethics and Public Trust Commission:  
>  
> Please accept this letter as a request for Conflict of Interest Opinion concerning the relationship of a County Employee and my Firm.  
> I am currently in the Vendor Services application process and my spouse is a County Employee. My spouse was hired under the Miami-Dade County Parks, Recreation and Open Spaces Department as the PROS Special Events Coordinator on May 27, 2013. Her Miami-Dade County Employee I.D. # is 310360. The nature of my business is to purchase industrial parts and machinery to export to Central and South America and most recently to local clients. I am applying to the Miami-Dade County, Internal Services Department, Procurement Management Services Division and in order to proceed I would need your clearance for processing.  
>  
> Attached you will find a copy of my vendor application. Below you will find my contact information, I would be more than happy to answer any questions you may have.  
>  
> Thank you in advance,  
> Juan Restrepo  
>  
>  
> --  
> Juan Restrepo  
> Industrial Trading Solutions  
> E-mail: juan@indts.com  
> Phone: (305)310-9181

--  
Juan Gonzalez  
Industrial Trading Solutions  
E-mail: juan.gonzalez@indts.com

## Relatives of County Employees Wishing to Register as County Vendors

Please submit the following information by mail, fax, **or** email to—

Gilma Diaz-Greco, Staff Attorney  
The Commission on Ethics & Public Trust  
19 West Flagler St., Suite 820  
Miami, FL 33130

Phone: (305) 350-0638  
Fax: (305) 579-0273  
Email: [gdiazgr@miamidade.gov](mailto:gdiazgr@miamidade.gov)

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YOUR NAME JUAN C RESTREPO

---

Name of Your Business INDUSTRIAL TRADING SOLUTIONS CORP

---

Type of Business INDUSTRIAL SUPPLIER

---

Your Mailing Address 60 SW 13ST #4410 MIAMI, FL 33130

---

Your Daytime Phone 305-310-9181

---

Your Email JUAN@INDTS.COM

---

Name of county employee  
who is related to you NATHALIA SALAS-RESTREPO

---

Type of relationship—  
spouse? child? parent? other? SPOUSE

---

County employee's  
department, if known MDPROS

---

County employee's title, if  
known SPECIAL EVENTS COORDINATOR

---

Please list the **names, titles,  
and departments** of any  
other immediate family  
members currently employed  
by Miami-Dade Co. N/A

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The Miami-Dade County Conflict of Interest & Code of Ethics at § 2-11.1 (c)(2) allows immediate family members of County employees to contract with the County in certain circumstances and if the following criteria are met. Please confirm that you and your immediate family member/s will be able to meet all of these criteria:

1. Entering into a contract with the County will not interfere with the full and faithful discharge of the County employee's duties to the County.
2. The County employee will not participate in determining your contract requirements.
3. The County employee will not participate in awarding the contract.
4. The County employee's job responsibilities and job description will not require him/her to be involved in the contract in any way including, but not limited to, its enforcement, oversight, administration, amendment, extension, termination, or forbearance.
5. The County employee will not be working in the County department that enforces, oversees, or administers your contract.

I have read these requirements and pledge to abide by them.



01 / 08 / 2014

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**Signature**

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**Date**

Your ethics opinion will be sent to you by first class mail and email, unless you request another type of delivery.  
COE 11/2013