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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Wednesday, April 23, 2014 1:40 PM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** FW: INQ - Ramona White, Human Resources (Nepotism)

INQ 14-106

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**From:** White, Ramona (HR)  
**Sent:** Wednesday, April 23, 2014 11:18 AM  
**To:** Ethics (COE)  
**Cc:** Diaz-Greco, Gilma M. (COE); Sanchez, Gerald (CAO)  
**Subject:** RE: INQ - Ramona White, Human Resources (Nepotism)

Thank you very much for your prompt response.

**Ramona White**  
**Labor Management Officer**  
Miami-Dade County -Human Resources  
111 NW 1st Street • Suite 2110 • Miami, FL 33128  
Phone: (305) 375-5630  
[www.miamidade.gov/HR](http://www.miamidade.gov/HR)

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**From:** Ethics (COE)  
**Sent:** Wednesday, April 23, 2014 11:12 AM  
**To:** White, Ramona (HR)  
**Cc:** Diaz-Greco, Gilma M. (COE); Sanchez, Gerald (CAO)  
**Subject:** INQ - Ramona White, Human Resources (Nepotism)

Ms. White,

The County Conflict of Interest and Code of Ethics Ordinance, over which the Commission on Ethics has jurisdiction, does not contain a Nepotism provision. There is a Nepotism provision in State law, F.S. 112.3135, which the County also follows through its administrative policies. The county policy you have cited is not part of the Ethics Commission's jurisdiction, but is an administrative matter that should be addressed through the Mayor and appropriate county administrators, in consultation with the County Attorney's Office.

As general guidance, it is my understanding that neither the law nor county policy prohibits two immediate family members from working in the same department or even supervising one another, but does draw the line at hiring, promoting, granting raises, or recommending such actions for close family members. The policy also provides that, "Department directors are strongly encouraged to refrain from placing relatives within another relative's chain of command or placing or maintaining relatives in close proximity in a departmental subunit."

I suggest that the circumstances you have described be brought to the attention of the Department Director or other appropriate County administrator.

Sincerely,

Joseph M. Centorino

Executive Director and General Counsel  
Miami-Dade Commission on Ethics and Public Trust

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**From:** White, Ramona (HR)  
**Sent:** Tuesday, April 22, 2014 4:21 PM  
**To:** Ethics (COE)  
**Subject:** Nepotism

I would appreciate an opinion in the following scenario:

There is a mother and daughter who work in the same department here in the County. The daughter is a supervisor. The mother is an employee in the same division, but not in the same chain of command. Is this a violation of "Section C" of the County's Nepotism policy?

<< OLE Object: Picture (Device Independent Bitmap) >>

Please advise.  
Thank you.

**Ramona White**  
Miami-Dade County -Human Resources  
111 NW 1st Street • Suite 2110 • Miami, FL 33128  
Phone: (305) 375-5630  
[www.miamidade.gov/HR](http://www.miamidade.gov/HR)