
From: Diaz-Greco, Gilma M. (COE)
Sent: Friday, September 05, 2014 2:35 PM
To: Sanchez, Rodzandra (COE)
Subject: Limitations on Conducting Business with the County- INQ 14-208
Attachments: INQ 14-208 Dixon.pdf; Dixon bluebook.pdf; Dixon Application.pdf

INQ 14-208

From: Diaz-Greco, Gilma M. (COE)
Sent: Friday, September 05, 2014 2:21 PM
To: 'msholmes1@msn.com'
Subject: FW: Limitations on Conducting Business with the County- INQ 14-208

Dear Ms. Dixon:

Attached is the Limitations on Doing Business with the County Ethics Opinion letter. Please note that it indicates that Ask Holmes, LLC may enter into contracts with Miami-Dade County but not with the Miami-Dade Corrections and Rehabilitation Department.

You may print this letter and submit it to the Procurement Department. I will send you the original letter via regular mail.

Please 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
www.facebook.com/MiamiDadeEthics

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DEPUTY GENERAL COUNSEL

Via First Class Mail
and email at: msholmes1@msn.com

September 5, 2014

Marniece Dixon
Ask Holmes, LLC
PO Box 694216
Miami, FL 33269

*Please submit this letter to
the Procurement
Department. The Ethics
Commission does not submit
this letter on your behalf*

Re: INQ 14-14-208, Limitations on Doing Business with the County

Dear Ms. Dixon:

Ask Holmes, LLC (ASL) may enter into contracts with Miami-Dade County but not with the Miami-Dade Corrections and Rehabilitation Department.

This opinion is based on the following facts and legal analysis:

On September 1, 2014, you asked about limitations in doing business with the County through your privately owned company, ASL. You are employed as a Corrections Counselor 1 working in the Miami-Dade County Corrections and Rehabilitation Department.

OUTSIDE EMPLOYMENT

Work conducted for your privately owned company constitutes outside employment. The Ethics Code prohibits County employees from engaging in conflicting outside employment. You will be required to obtain permission to engage in outside employment annually from your supervisor and file related financial disclosure forms every year. Conflicting employment is sometimes created when a County employee comes in contact with the same or similar people or entities in both his outside employment and in his County job or when he uses the same or similar resources in his outside employment as he uses in his County work. See the County Code at Secs. 2-11.1 (g) and (j).

Please note that this letter does not grant you permission to engage in outside employment. You must obtain permission to engage in outside employment annually from your supervisor and file related financial disclosure forms every year.

CONTRACTING WITH THE COUNTY

Once you have been granted permission to engage in outside employment, you may enter into a County contract through your privately owned company, ASL, as long as the contract does not interfere with the full and faithful discharge of your duties to the County. See the County Ethics Code at Secs. 2-11.1 (c)(2) and (d).

This includes the condition that you may 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, you may **not** work in any County department that would enforce, oversee or administer this contract. Consequently, ASL may not enter into contracts with the Miami-Dade-County Corrections and Rehabilitation Department.

LOBBYING

Additionally, you may not lobby the County. In this case, you may not contact anyone within the County in an attempt to influence a decision about the contract you are seeking. See the County Ethics Code at Sec. 2-11.1 (m)(1).

This opinion construes the Miami-Dade County Ethics Code as it applies to County employee-vendors at Secs. 2-11.1 (c)(2), (d), and (m)(1) 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

INQ 14-208
Dixon

September 5, 2014
Page 2

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

Employee's Name	Marniece Dixon
Employee's Dept.	Corrections & Rehabilitation
Employee's Title	Corrections Counselor 1
Business Name	Ask Holmes, LLC
Type of Business	Transportation Services
Employee's Mailing Address	PO Box 694216 Miami FL 33269
Employee's Daytime Phone	786-263-4246 (office) 305 763-3469 (cell)
Employee's Preferred Email	msholmes1@msn.com
Immediate Family Members	NO - per phone conversation 9/5/14

(Please list the names, titles, and departments of any immediate family members currently employed by Miami-Dade Co.)

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

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

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


Signature

9-1-14
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

Home	My Profile	Bluebook	My Account	Help	My Profile	Logout	What's New
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My BlueBook Profile

Search for County Employee

Select Department

Last Name: First Name: Office Number (305-xxx-xxxx):

Exact Match

 [My Blue Book Info](#)

Results

This is 1 out of 1 pages of results.

First Name	Last Name	Position	Division	Department	Email Address	Phone Number	Office Location
MARNIECE	DIXON	CORR CONS1	PROGRAM SERVICES DIVISION	CORRECTIONS & REHABILITATION	a8804@miamidade.gov	(786) 263- 4246	1321 NW 13 ST Miami FL, 33125

This is 1 out of 1 pages of results.

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