
From: Diaz-Greco, Gilma M. (COE)
Sent: Thursday, September 18, 2014 3:57 PM
To: Sanchez, Rodzandra (COE)
Subject: FW: Evelyn Campos- Director- Professional Complianc- Aviation (Outside Employment) INQ 14-220

INQ 14-220

From: Diaz-Greco, Gilma M. (COE)
Sent: Thursday, September 18, 2014 3:53 PM
To: Campos, Evelyn (Aviation)
Cc: Mizrahi, Eli (Aviation); Burke-Wheeler, Dialis (Aviation); Centorino, Joseph (COE)
Subject: Evelyn Campos- Director- Professional Complianc- Aviation (Outside Employment) INQ 14-220

Dear Ms. Campos:

You have inquired whether a conflict of interest would exist where an employee of the Miami-Dade Aviation Department (MIA) has requested permission to engage in outside employment providing airport leasing consulting services for a business consulting firm that is not a County vendor or tenant.

As background, Mr. Eli Mizrahi is employed by MIA as a Senior Property Manager administering leases for the Airport Terminal Building. Mr. Mizrahi does not solicit or select current or potential airport tenants; he is not responsible for the assignment of lease spaces or for the drafting or negotiating of lease documents or lease terms. His job responsibilities include preparing standardized "boiler" plate agreements drafted and approved by the executive staff in consultation with County Attorneys and submitting these executed agreements to the County Attorney for legal sufficiency review and to the executive staff for approval.

He is seeking outside employment with Jacobsen/Daniels Associates, LLC (JDA), a Michigan company, which provides business consulting services throughout the United States and its territories. JDA is not currently a county vendor or a tenant at MIA or other County general aviation airports, and it is not anticipated that they will seek to become a County vendor or tenant in the foreseeable future. Mr. Mizrahi's job responsibilities for JDA would be limited to a single project involving the development of a document outlining best practices regarding airport leasing policies and procedures. His work hours for the JDA would occur on evenings and weekends, outside of his MIA work hours.

We have discussed this matter with Mr. Mizrahi's supervisor, and concur with her that Mr. Mizrahi's work for JDA is not closely related to the lease preparation function he performs in his County employment at MIA. The hours of employment with JDA would not conflict with Mr. Mizrahi's hours of employment at MIA, it would not involve work with a County Contractor, and it would not require him to lobby the County on JDA's behalf or to interact with County employees or boards on behalf of JDA. Under these circumstances, it is unlikely that this type of work would impair his independence of judgment in the performance of his County duties at MIA as a Senior Property Manager. *See County Ethics Code at Sec. 2-11.1(j).*

As a reminder, pursuant to the County Code at Section 2-11, County employees are required to request permission for outside employment from their supervisor (Request for Outside Employment form) on a yearly basis. The County Code at Section 2-11.1(k)(2) requires filing a financial disclosure form (Outside Employment Statement) on a yearly basis. In addition, County employees are cautioned that they may not engage in any activity which would require them to disclose confidential information acquired by reason of their official position, nor use such information directly or indirectly for their personal gain or benefit. *See County Code at Sec. 2-11.1(h)*

This opinion is based on the facts presented. If any of the facts presented here change, or if you have any further questions, please contact us.

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
www.facebook.com/MiamiDadeEthics

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From: Campos, Evelyn (Aviation) [<mailto:ECampos@miami-airport.com>]
Sent: Wednesday, September 10, 2014 12:54 PM
To: Diaz-Greco, Gilma M. (COE)
Cc: Owens, Greg (Aviation); Campos, Evelyn (Aviation)
Subject: RE: Opinion Requested on Outside Employment

Ms. Diaz-Greco,

We are gathering the additional information from the affected employee to assure the most accurate presentation of facts. We will transmit the information as soon as it is acquired, thank you.

Evelyn Campos, Director
Professional Compliance Division
Miami-Dade Aviation Department
P.O. Box 526624
Miami, Fla 33152
305-876-7390 Direct
305-439-9439 Cell
www.miami-airport.com

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From: Diaz-Greco, Gilma M. (COE) [<mailto:GDIAZGR@miamidade.gov>]
Sent: Monday, September 08, 2014 2:12 PM
To: Campos, Evelyn (Aviation)
Subject: Opinion Requested on Outside Employment

Ms. Campos,

Joseph Centorino referred this matter to me. It is my understating from reading your email, that Jacobsen/Daniels Associates, L.L.C. is neither a County Vendor, nor does it lease space from the County Aviation Department. In your email you indicate that the County employee would not be providing airport leasing consulting services to the County, but would be providing these services elsewhere throughout the county. Would you please provide additional details with respect to what services this employee would be providing in his outside employment and where else in the County these services would be provided?

Best regards,

Gilma (Mimi) Diaz-Greco
Staff Attorney



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From: Centorino, Joseph (COE)
Sent: Monday, August 25, 2014 1:51 PM
To: Diaz-Greco, Gilma M. (COE)
Subject: FW: Opinion Requested on Outside Employment

Please handle this.

From: Campos, Evelyn (Aviation) [<mailto:ECampos@miami-airport.com>]
Sent: Monday, August 25, 2014 12:46 PM
To: Centorino, Joseph (COE)
Cc: Jimenez, Barbara S. (Aviation); Owens, Greg (Aviation); Campos, Evelyn (Aviation)
Subject: Opinion Requested on Outside Employment

Mr. Centorino,

We respectfully request the Commission on Ethics provide an opinion on the attached request for Outside Employment as being a possible conflict of interest.

The requestor is an employee of the Aviation Department. He is a Senior Property Manager responsible for overseeing a portfolio of leases for the Airport. He is seeking outside employment with a company to work as a consultant providing airport leasing consulting services. The company is not a tenant at MIA or our other general aviation airports. The employee will be providing leasing consulting services throughout the County and US territories. The employee states that the employment will consume 7 hours per week on nights and weekends. The company is headquartered in Michigan.

We appreciate the Commission's assistance in resolving this issue.