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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Friday, September 26, 2014 3:47 PM  
**To:** Sanchez, Rodzandra (COE)  
**Subject:** : Diana Floyd, General Counsel, Synagro- Ethics Opinion (travel expenses) INQ 14-229

INQ 14-229

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**From:** Diaz-Greco, Gilma M. (COE)  
**Sent:** Friday, September 26, 2014 3:30 PM  
**To:** 'Floyd, Diana'  
**Cc:** Centorino, Joseph (COE)  
**Subject:** Diana Floyd, General Counsel, Synagro- Ethics Opinion (travel expenses) INQ 14-229

Dear Ms. Floyd:

You have inquired whether two employees of Synagro, A Miami-Dade County vendor, may take two County employees to lunch or dinner during the upcoming WEFTEC conference. It is our understanding that this conference is taking place in New Orleans.

The provision of the County Ethics Code applicable in this case is the prohibition on acceptance of travel expenses from County vendors. It states that no County employee:

“ shall accept, directly or indirectly, any travel expenses including, but not limited to, transportation, lodging, *meals*, registration fees and incidentals from **any** county vendor, service provider, bidder or proposer.” See Miami Dade County Code at Section 2-11.1(w)(emphasis added).

County employees travelling to attend the WEFTEC conference in New Orleans would therefore be prohibited from accepting meals from Synagro which is a County vendor.

Please contact us if you have any further questions.

Best regards,

Gilma (Mimi) Diaz-Greco  
Staff Attorney



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**From:** Floyd, Diana [<mailto:dfloyd@SYNAGRO.com>]  
**Sent:** Friday, September 26, 2014 2:41 PM  
**To:** Diaz-Greco, Gilma M. (COE)  
**Subject:** Synagro

Hi Gilma:

I just left you a voicemail. Nice to meet you albeit virtually.

We are a vendor for Miami Dade county and I have questions about your Conflict of Interest & Code of Ethics Ordinance specific to its Section E.

Two of our employees wanted to take two of yours to lunch or dinner while attending the upcoming WEFTEC conference. My understanding is that we have current work with the County but are not in active RFP. I have questions about this part of Section E below and want to make sure that performing services is not a prohibition under 3.b. Do you have time to discuss? Thank you.  
Diana

- (3) *Prohibitions.* A person described in Subsection (b) (1) through (6) shall neither solicit nor demand any gift. It is also unlawful for any person or entity to offer, give, or agree to give to any person included in the term defined in Subsection (b)(1) through (6) or for any person included in the term defined in Subsection (b)(1) through (6) to accept or agree to accept from another person or entity, any gift for or because of:
- (a) **An official public action taken or to be taken, or which could be taken;**
  - (b) **A legal duty performed or to be performed, or which could be performed; or**
  - (c) **A legal duty violated or to be violated, or which could be violated by any person included in the term defined in Subsection (b)(1).**



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