
From: Diaz-Greco, Gilma M. (COE)
Sent: Tuesday, October 07, 2014 3:54 PM
To: Sanchez, Rodzandra (COE)
Subject: Ethics Opinion- Limitations on contracting with the County- INQ 14-238
Attachments: INQ 14-238 Silva.pdf; Silva application.pdf; Elizabeth Silva Blue book.pdf

INQ 14-238

From: Diaz-Greco, Gilma M. (COE)
Sent: Tuesday, October 07, 2014 3:48 PM
To: 'lsilva@alucescorp.com'
Cc: Silva, Liz (CIAO)
Subject: Ethics Opinion- Limitations on contracting with the County- INQ 14-238

Dear Mr. Silva:

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 Customer Information and Outreach department, the department in which your spouse Elizabeth L. Silva works. I will send you the original letter via regular mail. Please submit the opinion letter to the Procurement Department. The Ethics Commission does not submit the letter on your behalf.

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
www.facebook.com/MiamiDadeEthics

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DEPUTY GENERAL COUNSEL

Via First Class Mail and
email at lsilva@alucescorp.com

October 7, 2014

Luis A. Silva
Aluces Corporation
8501 SW 124th Avenue
Suite 204A
Miami, FL 33183

Re: INQ 14- 238, Limitations on Doing Business with the County

Dear Mr.Silva:

On October 1, 2014, you asked about limitations in contracting with the County through your privately owned company, Aluces Corporation, a civil engineering consulting firm. Your spouse, Elizabeth L. Silva, is employed by the Miami-Dade Community Information and Outreach Department (CIAO) as a Special Projects Administrator 2.

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 Elizabeth L. Silva shall not participate in determining the contract requirements or in awarding the contract. Additionally, none of Ms. Silva'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 Aluces Corporation, shall not enter into contracts with CIAO.

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,

A handwritten signature in black ink that reads "Gilma Diaz - Greco". The signature is written in a cursive style with a horizontal line through the middle of the letters.

Gilma Diaz-Greco
Staff Attorney

copy: Elizabeth I. Silva at liz.silva@miamidade.gov

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

YOUR NAME	Luis A. Silva
Name of Your Business	Aluces Corporation
Type of Business	Civil Engineering (Design) Consultant
Your Mailing Address	8501 SW 124th Ave, Suite 204A, Miami, FL 33183
Your Daytime Phone	(305) 323-3047
Your Email	lsilva@aluceecorp.com
Name of county employee who is related to you	Elizabeth L. Silva
Type of relationship— spouse? child? parent? other?	Spouse
County employee's department, if known	CIAO
County employee's title, if known	SPA2
Please list the names, titles, and departments of any other 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 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.

Signature 

10/01/2014

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

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My BlueBook Profile

Search for County Employee

Select Department

Select Department

Last Name	First Name	Office Number (305-xxx-xxxx)
Silva	Elizabeth	

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
ELIZABETH	SILVA	SPA2	CUSTOMER SERVICE AND OUTREACH	COMMUNITY INFORMATION AND OUTREACH	liz.silva@miamidade.gov	(305) 499-8964	2700 NW 87TH AVE Doral FL 33172

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