
From: Diaz-Greco, Gilma M. (COE)
Sent: Tuesday, October 21, 2014 2:45 PM
To: Sanchez, Rodzandra (COE)
Subject: Lynn Barrett, Chief Compliance Officer, JHS (Conflicting Outside Employment, Prohibited Investments) INQ 14-250

INQ 14-250

From: Centorino, Joseph (COE)
Sent: Tuesday, October 21, 2014 11:20 AM
To: Diaz-Greco, Gilma M. (COE)
Cc: Shy, Eugene (CAO)
Subject: INQ - Lynn Barrett, Chief Compliance Officer, JHS (Conflicting Outside Employment, Prohibited Investments)

Lynn Barrett, Chief Compliance Officer at Jackson Health Systems (JHS) inquired concerning the outside employment of a physician recently hired by the hospital, Dr. Amado Baez. Dr. Baez, who has been with JHS for a couple of months, through an apparent mistake by JHS, did not fill out an outside employment form upon his hiring. Dr. Baez has ownership interests in two companies in the Dominican Republic. One is a "medical tourism" company, of which he is the Vice President, which engages in matching people in other countries with available medical services in the U.S. The second is an Emergency Room Urgent Care Staffing Company in the Dominican Republic. He has apparently been involved personally with the operations of these two companies, and is considering having the medical tourism company buy the urgent care company. The situation has come to the attention of JHS, which is concerned about the fact that his involvement in these companies may be in conflict with his position at JHS insofar as he may be in a position to use his position at JHS to enhance the profitability of those companies, and there may be situations in which the interests of one or the other company could conflict with Jackson's interest, given that JHS has its own urgent care facility. He has offered to become only passive investor in the companies, if that would eliminate any conflict.

Upon discussing this with Ms. Barrett, I agreed that his involvement in these companies, as an active participant or as a passive investor, could easily create an impairment of his independence of judgment in the performance of his public duties under Section 2-11.1(j) of the County Ethics Code, as well as a Prohibited Investment under Section 2-11.1(l) of the Code. Going forward, I agreed with her recommendation that to avoid such conflicts, or a possible Exploitation of Official Position under Section 2-11.1(g) of the Code, it would be best to require Dr. Baez to divest himself of his personal and financial involvement in these companies.

Joseph M. Centorino

Executive Director and General Counsel
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
ethics.miamidade.gov

