#### Diaz-Greco, Gilma M. (COE)

From:	Diaz-Greco, Gilma M. (COE)
Sent:	Tuesday, February 18, 2014 11:47 AM
То:	zrr@rinkinsmultimedia.com
Cc:	Centorino, Joseph (COE)
Subject:	Mom and Pop Grant Ethics Opinion INQ 14-37
Attachments:	IN Q 14-37 Rinkins.pdf

Dear Mr. Rinkins:

Attached is the Mom and Pop Grant Opinion. Please note that it indicates that you **may accept a grant** as long as the Miami-Dade Advocacy Trust is not involved in any way in processing or administering the grant. Further, you **may not lobby for the grant**. (See the County Ethics Code at Secs. 2-11.1 (c) and (m)(1).).

I will send you the original letter via regular mail. 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 ethics.miamidade.gov

From: Ethics (COE)
Sent: Tuesday, January 28, 2014 1:19 PM
To: Diaz-Greco, Gilma M. (COE)
Subject: FW: Ethics Opinion Request: MDC Employee Mom & Pop Grants

Please handle.

From: zrr@rinkinsmultimedia.com [mailto:zrr@rinkinsmultimedia.com] Sent: Tuesday, January 28, 2014 12:12 PM To: Ethics (COE) Subject: Ethics Opinion Request: MDC Employee Mom & Pop Grants

Greetings:

Please see the attached document requesting an opinion from the Commission on Ethics Acquiring Financial Interest.

Please review the document forward your opinion to both me and Mr. Leroy Jones, the executive director of the Neighbors and Neighbors Association, Inc.

My contact information is as follows:

Zachary Rinkins 786-391-7296 <u>zrr@RinkinsMultimedia.com</u> 2499 N.W. 86 Street Miami, Florida 33147

Sincerely, Zachary Rinkins

### MIAMI-DADE COMMISSION ON ETHICS AND PUBLIC TRUST

#### COMMISSIONERS

Charlton Copeland, CHAIRMAN Nelson Bellido, VICE CHAIR Dawn Addy Kerry E. Rosenthal Judge Lawrence Schwartz



### EXECUTIVE STAFF

Joseph M. Centorino EXECUTIVE DIRECTOR GENERAL COUNSEL Michael P. Murawski ADVOCATE Miriam S. Ramos DEPUTY GENERAL COUNSEL

Via First Class Mail and email at <u>zrr.rinkinsmultimedia.com</u>

February 18, 2014

Zachary Rinkins Rinkins Multimedia Ventures, LLC 2499 N.W. 86 Street Miami, FL 33147

Re: INQ 14-37, Mom & Pop Grant

Dear Mr. Rinkins:

You asked if the County Ethics Code would prevent your privately owned company, Rinkins Multimedia Ventures, LLC, from accepting a Mom & Pop Grant funded through Commissioner Jean Monestime's District 2 Office. You are employed by the Miami-Dade County Economic Advocacy Trust an Administrative Officer II.

Briefly, your company may *accept a grant* as long as the Miami-Dade Advocacy Trust is not involved in any way in processing or administering the grant. Further, you *may not lobby for the grant*. (*See* the County Ethics Code at Secs. 2-11.1 (c) and (m)(1).)

Be advised that the County Ethics Commission has interpreted lobbying very expansively when applied to County employees. This means that you may not contact anyone within the County, or anyone working on behalf of the County, in an attempt to influence his/her decision about the grant you are seeking.

This opinion construes the Miami-Dade Conflict of Interest and Code of Ethics Ordinance only and is not applicable to any conflict under state law. Inquiries regarding possible conflicts under state law should be directed to the State of Florida Commission on Ethics.

19 W. Flagler St. • Ste. 820 • Miami, FL 33130 • (305) 579-2594 • ethics@miamidade.gov • ethics.miamidade.gov

Please feel free to contact me if I can be of further assistance.

Sincerely,

Eitner Dig - hus

Gilma Diaz-Greco Staff Attorney

Copies: Leroy Jones Executive Director Neighbors and Neighbors Association, Inc. 180 NW 62<sup>nd</sup> Street Miami, FL 33150

> Commissioner Jean Monestime Stephen P. Clark Center 111 NW 1st Street, Suite 220 Miami, Florida 33128





## **Request for Opinion from Commission on Ethics Acquiring Financial Interest**

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Are y	ou curr
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- am being

District 2



Zachary Rinkins
(Owner or President Name)
<u> (Business Name)</u>
2499 N.W. 86 Street Miami, I
(Business Address, City, State, Zip)
ently an employee of Miami Da
Department? <u>Miami-Dade</u>
g considered for funding thro
rant Program and request the

ough the Mom and Pop Small Business Grant Program and request the clearance from the Commission on Ethics. Please review my request and forward to Neighbors And Neighbors Association, Inc. to the attention of Leroy Jones, Executive Director, 180 NW 62<sup>nd</sup> St., Miami, FL 33150 or fax (305) 756-6008. Thank you in advance for your attention to this very important matter.

# This page must be fully completed

Financial Interest with County, FY 13/14 – Mom and Pop Small Business Grant Program

the owner or president of <u>LLC</u>, whose business address is FL 33147

ade County? Yes: No: \_\_\_\_ Economic Advocacy Trust

