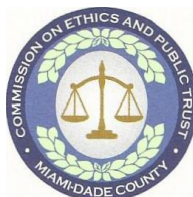


MIAMI-DADE COMMISSION ON ETHICS AND PUBLIC TRUST

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June 25, 2024

Mr. De'Andre Coley
Vice-President and Director, Miami Knights Optimist
Deandrecoley95@gmail.com

Re: INQ 2024-114, Jurisdiction and Limitations on Doing Business with the County, §§ 2-11.1(b) and (c) respectively, County Ethics Code

Greetings Mr. Coley,

It was a pleasure speaking to you regarding your non-profit organization's intention to contract with the County, given the fact that you have an aunt who is a county employee. You stated that you are employed by the Miami-Dade County Public School Board as a Security Monitor. You are also the Vice-President and Director of Miami Knights Optimist, a not-for-profit organization which provides sports programs for inner city youth. Your aunt, Jacqueline Coley, is a Train Operator for the County's Department of Transportation and Public Works. You have applied for a permit with Miami-Dade County's West Little River Park for the use of the park to conduct a football sports program.¹

The County Ethics Code at Sections 2-11.1 (c)(2) and (d) allows county employees and/or their *immediate family members* to enter into a contract, agreement, or business engagement, individually or through a firm, with Miami-Dade County, as long as the contract, agreement, or business engagement, does not interfere with the full and faithful discharge of the county employee's duties to her county department and Miami-Dade County in general.

Section 2-11.1(b)(9) of the Ethics Code defines "immediate family" members of an employee as "the spouse, domestic partner, parents, stepparents, siblings, half-siblings, step-siblings, children, and stepchildren" of the employee. Consequently, **as the nephew of a county employee, you do not fall within the jurisdiction of the County Ethics Code.**

Sincerely,

A handwritten signature in black ink, appearing to read "Martha D. Perez". The signature is fluid and cursive, written over a horizontal line.

Martha D. Perez, Temporary Staff Attorney

¹ West Little River Park is managed by the County's Parks, Recreation and Open Spaces Department ("PROS").

