



August 29, 2005

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ADVOCATE

ARDYTH WALKER
STAFF GENERAL COUNSEL

Andrea Cambridge-Rasul
Diamond Construction Group, Inc.
10801 S.W. 173 Street
Miami, Florida 33130

Dear Ms. Cambridge-Rasul:

I am in receipt of your letter dated August 8, 2005 asking the Miami-Dade Ethics Commission for an opinion concerning a possible conflict of interest that could exist due to a company you and your husband own and your County employment. You state in your letter that you are employed with Miami-Dade Transit as the Manager of Training and Development and you and your spouse own a residential and commercial construction company, which is seeking to finalize its Business Enterprise Certification application.

There are three sections of the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance that must be analyzed in light of the abovementioned facts. The first question is whether your secondary employment conflicts with your County employment. Based upon your position with the County, there appears to be no conflict of interest created by your ownership of a construction company, as the scope of the firm's activities seem unrelated to your duties with the County.

The second area of inquiry involves transacting business with the County. The Code of Ethics permits Diamond Construction Group to transact business with the County as long as it does not engage in business with the Transit Department. Therefore, the firm can enter into contracts with all other County departments and agencies, with the exception of Miami-Dade Transit.



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The third point is that you must be careful when interacting with the County when you are representing third parties who have hired your company to work on construction projects in Miami-Dade County. This means that you, because you are a County employee, cannot meet with other County employees to discuss anything related to the activities of Diamond Construction Group, other than routine administrative matters. Therefore, if problems arise between one of your clients and Miami-Dade County, you are not permitted to intervene on behalf of your clients.

Lastly, all requests for outside employment must be approved by your Department Director and all income generated from your outside employment must be reported pursuant to the Conflict of Interest Code of Ethics Ordinance.

If you have any questions, please do not hesitate to contact me at your convenience.

Sincerely,

Robert Meyers
Executive Director

INQ 05-133

**Diamond Construction
Group, Inc.**

10801 S.W. 173 Street Miami, Florida 33157 CGC 062067 Licensed and Insured

August 8, 2005

Commission on Ethics and Public Trust
19 West Flagler
Suite 209
Miami, Florida 33130

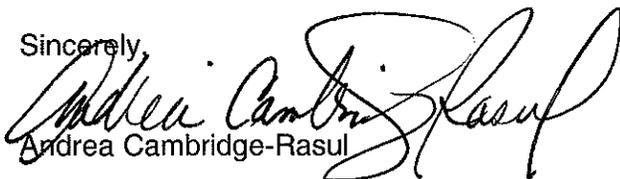
Re: Request for Legal Opinion

Dear Commission:

This letter serves to request a legal opinion to finalize my company's Business Enterprise Certification application. I have been employed by Miami Dade County since 1993. Currently, I am employed with Miami Dade Transit as the Manager of Training and Development. Along with my husband, I own Diamond Construction Group, Inc.; a residential and commercial construction company.

Should you require additional information, I may be reached at 786-357-0199.
Thank you for your attention to this matter.

Sincerely,


Andrea Cambridge-Rasul