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December 20, 1999

Clydia M. Armstrong
President
Communications X, Inc.
8404 Miramar Parkway
Miramar, Florida 33025

RE: REQUEST FOR ADVISORY OPINION 99-56

Dear Ms. Armstrong:

The Commission on Ethics and Public Trust considered your request for an advisory opinion at its meeting on December 15, 1999 and rendered its opinion based on the facts stated in your letter.

You requested an opinion regarding your ability to provide training through the Metro-Miami Action Plan (MMAP).

In your letter, you advised the Commission that you worked as a county employee from August of 1993 until April of 1999. You would like to apply for a contract to provide entrepreneurial training for youth with the Metro-Miami Action Plan (MMAP).

The Commission found that The Conflict of Interest and Code of Ethics Ordinance does not prohibit former employees from contracting with the county to provide services. Section 2-11.1(q) only restricts former employees from lobbying Miami-Dade County in connection with any judicial or other proceeding, application, RFP, RFQ, bid, request for ruling or other determination, contract, claim, controversy, charge, accusation, arrest or other particular

subject matter in which Miami-Dade County or one of its instrumentality has any interest whatever, direct or indirect. Therefore, you may apply for county contracts as long as you do not lobby any county officials or department.

Therefore, the Conflict of Interest and Code of Ethics ordinance does not prohibit you from contracting with MMAP to provide entrepreneurial training for youth.

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. Please contact the State of Florida Commission on Ethics if you have any questions regarding possible conflicts under state law.

If you have any questions regarding the opinion, please call the undersigned at (305) 579-2954 or Ardyth Walker, Staff General Counsel at (305) 579-2653.

Sincerely Yours,

A handwritten signature in cursive script, appearing to read "Robert Meyers", with a long horizontal flourish extending to the right.

ROBERT MEYERS
Executive Director