

contract that you apply for and include a copy of such request with each bid.

Therefore, Section 2-11.1(c), permits you to contract with some county departments to provide locksmith services. You must submit a request for opinion with each bid and receive an opinion prior to entering into a contract with any department.

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 this opinion, please call the undersigned at (305) 579-2594 or Ardyth Walker, Staff General Counsel at (305) 579-2653.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Robert Meyers", with a long horizontal line extending to the right.

ROBERT MEYERS  
Executive Director

Section 2-11.1 (c) provides that "Notwithstanding any provision to the contrary herein, subsection (c) and (d) shall not be construed to prevent any employee as defined by subsection (b) (6) [excluding departmental personnel as defined by subsection (b) (5)] or his or her immediate family as defined by subsection (b) (9) from entering into any contract, individually or through a firm, corporation, partnership or business entity in which the employee or any member of his or her immediate family has a controlling financial interest, with Miami-Dade County or any person or agency acting for Miami-Dade County, as long as: 1) entering into the contract would not interfere with the full and faithful discharge by the employee of his or her duties to the county, 2) the employee has not participated in determining the subject contract requirements or awarding the contract, and 3) the employee's job responsibilities and job description will not require him or her to be involved with the contract in any way, including but not limited to its enforcement, oversight, administration, amendment, extension, termination or forbearance. However, this limited exclusion shall not be construed to authorize an employee or his or her immediate family member to enter into a contract with Miami-Dade County or any person or agency acting for Miami-Dade County if the employee works in the county department which will enforce, oversee or administer the subject contract.

You may contract with these departments to provide lock services because your husband is not involved with the subject contracts in any of the ways enumerated in the contract. However, you would still be prohibited from contracting with the Aviation Department to provide locks.

Further, the ordinance requires you to request an advisory opinion for each county



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**ARDYTH WALKER**  
STAFF GENERAL COUNSEL

March 30, 2000

Jennifer Renderer  
All County Lock and Key  
1746 N.E. Miami Gardens Drive  
Miami, FL 33179

**RE: REQUEST FOR ADVISORY OPINION 00-09**

Dear Mrs. Renderer:

The Commission on Ethics and Public Trust considered your husband's request for an advisory opinion at its meeting on March 29, 2000 and rendered its opinion based on the facts stated in your memorandum.

Your husband requested an opinion regarding your ability to contract with the county to provide locksmith services.

In his letter, your husband advised the Commission that you are the sole owner of All County Lock and Key. You would like to bid on contracts with several county departments including Housing, Transit, Corrections and Water and Sewer. You would like to know what are the requirements for you to apply for bids under the amendment to the contracting ordinance and whether you can receive contracts from these departments.

The Commission found that you may contract with the county to provide locks to the Housing, Transit, Corrections and Water and Sewer Department. Section 2-11.1 (d), as amended, permits the immediate family members of county employees to contract with the county through corporations in which they have a controlling financial interest.