



April 3, 2003

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STAFF GENERAL COUNSEL

Lydia Osborne
Director of Programs and Grants Management
Miami-Dade Empowerment Zone Trust
3050 Biscayne Boulevard Suite 300
Miami, FL 33137

RE: REQUEST FOR ADVISORY OPINION 03-52

Dear Dr. Osborne:

The Commission on Ethics and Public Trust reviewed your request for an advisory opinion at its meeting on March 28, 2003. The Empowerment Zone Trust is governed by an internal conflict of interest policy and not the Conflict of Interest and Code of Ethics ordinance. The Commission declined to issue an advisory opinion because the internal conflict of interest policy established by your by-laws is not subject to the Ethics Commission's jurisdiction.

Please contact the undersigned if you have questions or we can provide any other assistance.

SINCERELY YOURS,

ROBERT MEYERS
Executive Director