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September 2, 2008

## ETHICS COMMISSIONERS

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Patricia Ford President and CEO The Ford Group, Inc. 2980 Point East Drive D614 Aventura, FL 33160

## RE: REQUEST FOR ADVISORY OPINION RQO 08-37

Dear Ms. Ford:

The Commission on Ethics and Public Trust considered your request for an advisory opinion at its meeting on August 28, 2008 and rendered its opinion based on the facts in your request. You requested an opinion regarding whether you may become a registered county vendor.

In your request, you advised the Commission that you are the President and CEO of The Ford Group. The Ford Group provides public relations and marketing services. The firm is seeking to become a registered county vendor and provide public relations, marketing and public information services to county vendors.

You are currently a member of the Equal Opportunity Board. The Equal Opportunity Board is a quasi-judicial board charged with the responsibility of enforcing antidiscrimination legislation in the fields of public accommodations, housing, credit and financing, employment, family leave and pricing. The Equal Opportunity Board does not hear complaints from public employees.

The Ethics Commission found that the Ford Group may become a registered county vendor.

Section 2-11.1(c)(3) provides that "Notwithstanding any provision to the contrary herein, subsection (c) and (d) shall not be construed to prevent any person defined in subsection (b)(3)(quasi-judicial personnel) from entering into any contract, individually or through a firm, corporation, partnership or business entity in which the board member 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. However, any person defined in subsection (b)(3) is prohibited from contracting with any agency or department of Miami-Dade County subject to the regulation, oversight, management, policy-setting or quasi-judicial authority of the board of which the person is a member.

Since the Equal Opportunity Board does not regulate Miami-Dade County departments and does not handle complaints from county employees, the Ford Group is permitted to register as a county vendor and contract with any department or agency of Miami-Dade County.

This opinion construes the Miami-Dade Conflict of Interest and Code of Ethics opinion 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) 350-0616.

Sincerely Yours,

ROBERT MEYERS Executive Director