



Via First Class Mail  
and  
email at [zna@miamidade.gov](mailto:zna@miamidade.gov)

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December 27, 2011

Zafar Ahmed, GIS Database Asset Manager  
Miami-Dade Parks Department  
275 NW 2<sup>nd</sup> St.  
Miami, FL 33128

**Re: RQO 11-30**

Permission to engage in outside employment  
See Miami-Dade County Ethics Code at Secs. 2-11.1 (j) and (k)

Dear Mr. Ahmed:

In a public meeting on December 14, 2011, the Miami-Dade Ethics Commission found that you may engage in outside employment with certain limitations.

In your current County position, you create maps of County-owned recreational facilities using the geographic information system (GIS). You also manage the County's database of recreational assets. In your outside employment, you provide financial analyses to private developers of affordable housing.

Although your department may collaborate on affordable housing initiatives with the Housing Agency in the near future, you currently do not work with developers of affordable housing in your County position. Furthermore, you have advised us that you will not participate in choosing developers to work with the County prospectively, and you will not provide any technical support to those developers chosen by the County.

The County Code at Sec. 2-11.1 (j) states that a County employee may not accept outside employment if it will impair his independence of judgment in the performance of his public duties. At Sec. 2-11.1 (m), the Code prohibits County employees from meeting with County staff on behalf of third parties.

The Ethics Commission found that you may continue outside employment as a consultant to private developers of affordable housing, with the following provisos:

- You may not work as a private consultant with developers of affordable housing who also receive your assistance as a County employee.
- You may not work as a consultant for any firm seeking a grant or technical assistance from the Parks and Recreational Department as part of upcoming housing initiatives.
- You must submit a list of private clients to your department supervisor annually for evaluation as to any potential conflicts.
- You may not meet with County staff regarding funding for developers of affordable housing.

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. Inquiries regarding possible conflicts under state law should be directed to the State of Florida Commission on Ethics.

Please feel free to contact me or Victoria Frigo, Staff Attorney, if we can be of further assistance.

Sincerely,



JOSEPH CENTORINO  
Executive Director

Copy: Maria Nardi, Section Supervisor, Parks & Recreation Dept. at  
[MNARDI@miamidade.gov](mailto:MNARDI@miamidade.gov)