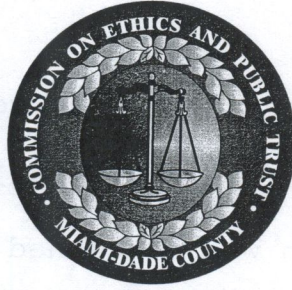


CLERK OF THE BOARD

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CLERK, CIRCUIT & COUNTY CTG
MIAMI-DADE COUNTY, FLA.
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MIAMI-DADE COUNTY
COMMISSION ON ETHICS & PUBLIC TRUST

In re: Public Health Trust
_____ /

Case No: 11-28

PUBLIC REPORT AND FINAL ORDER

Thomas McCullough filed the above-captioned complaint against the Public Health Trust for whistleblower retaliation. McCullough was terminated from the Public Health Trust after filing a complaint with the Office of Inspector General.

McCullough served as Director of Physician Services for the Public Health Trust (PHT). In that capacity, McCullough served as contract administrator for Community Medical Practices contracts. Community Medical Practices (CMP) is a division within the PHT that operates medical practices in the community. The PHT contracts with physician groups to provide services and the PHT pays management costs and other fees to the physician group.

In February and March of 2010, McCullough advised the PHT Chief Financial Officer and the PHT Vice-President of

Physician Services of several issues related to South Florida International Cardiology Consultants (SFICC). Specifically, McCullough was concerned that SFICC was being paid by the PHT at a higher rate than authorized under its agreement with the PHT and the lease of office space owned by a SFICC official to the PHT at the rate of \$100,000 a month.

In early 2011, PHT officials met with SFICC to discuss contract renewal. During negotiations, PHT officials declined to renegotiate the rate based on the recalculated rate proposed by McCullough and agreed to pay the higher rate. McCullough raised his objections to the new Vice-President of Physician Services as well as the Chief Medical Officer. Subsequently, McCullough was excluded from the negotiations between the PHT and SFICC.

In May of 2011, McCullough filed a written complaint with the Office of Inspector General (OIG) regarding the above allegations. The OIG later took a sworn statement from McCullough. Exactly one month later, McCullough was advised that his position was being eliminated for budgetary reasons.

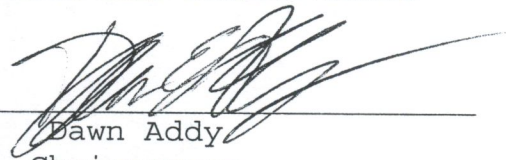
On October 25, 2011, the Advocate made a No Probable Cause recommendation on the grounds that McCullough was terminated for budgetary reasons. Thereafter, upon review

the complaint and being otherwise advised in the premises,
the Ethics Commission ordered the complaint dismissed for
lack of probable cause.

DONE AND ORDERED by the Miami-Dade County Commission
on Ethics and Public Trust in public session on October 25,
2011.

**MIAMI-DADE COUNTY COMMISSION
ON ETHICS AND PUBLIC TRUST**

By: _____



Dawn Addy
Chairperson

cc: Thomas McCullough
Barbara Ronda
Dr. Michael Butler
Ted Shaw

