

# Memo

**To:** Alberto Gonzalez  
CRA Analyst  
Community Redevelopment Division  
Office of Strategic Business Management

**From:** Ardyth Walker   
Staff General Counsel

**Date:** May 18, 2007

**Re:** INQUIRY 07-73

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I received your request for an advisory opinion regarding whether a consultant may simultaneously provide a redevelopment plan for the Goulds/Cutler Ridge Redevelopment Area and provide management consulting services to the Town of Cutler Bay. The Executive Director and I have reviewed this matter and I am issuing this opinion based on the information contained in your request. The Ethics Commission has not considered this matter. Please contact me if you want the matter placed on the Ethics Commission's June agenda.

In your request, you advised me that PMG Associates, Inc. is currently under contract with Miami-Dade County to conduct finding of necessity studies and community redevelopment plans for designated areas. PMG Associates is currently working on the CRA Plan for the Goulds/Cutler Ridge area that includes the Town of Cutler Bay. The work requires PMG Associates to coordinate community meetings with all stakeholders, develop funding alternatives and present a draft and final plan at a community meetings.

The Town of Cutler Bay has contacted PMG Associates to provide a proposal regarding providing management and financial services to the town. The proposed scope of services includes assistance with budget issues including capital budget

preparation. The consultant will also provide human resources, process and permitting assistance. Additionally, the consultant will assist Cutler Bay in working with Miami-Dade County on economic development, capital improvement and development issues.

PMG Associates may provide management and consulting services to the Town of Cutler Bay. However, PMG Associates is prohibited from providing any services to the Town of Cutler Bay regarding CRA issues or economic development issues that will be affected by the CRA proposal. Section 2-11.1(j) prohibits covered persons from accepting other employment that would impair his or her judgment in the performance of public duties. The Ethics Commission has consistently opined that this section prohibits contractors from working under agreements where there are overlapping responsibilities. Accordingly, PMG Associates may provide any management consulting services to the Town Cutler Bay that are unrelated to the CRA redevelopment plan.

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) 350-0616 or e-mail me at [awalker@miami-dade.gov](mailto:awalker@miami-dade.gov).