

Meyers, Robert (COE)

INQ 07-168

From: Meyers, Robert (COE)
Sent: Tuesday, November 06, 2007 11:20 AM
To: 'Roosevelt Bradley'
Subject: RE: Roosevelt Bradley-The Allen Group, LLC

Dear Mr. Bradley:

I apologize for not responding sooner to your inquiry. Essentially, you ask for clarification in three areas and I will respond to each question separately.

- 1) You wish to know whether you can manage The Allen Group's scope of work and supervise its employees assigned to Miami-Dade County projects in your capacity as an executive of the company and a former Miami-Dade County employee.

Answer: The Two Year Rule prohibits you from lobbying Miami-Dade for a period of two years after you left the County, but it does not prevent you from supervising employees who are assigned to Miami-Dade County contracts. I am assuming that for purposes of this question you would not have any interaction with County officials or employees – that would be left to other employees of the company.

- 2) You wish to know whether you may meet with County personnel and County Commissioner as an employee of The Allen Group.

Answer: This answer depends upon the content of the communications. You can meet with County officials and employees and share information with them and you may request information from them. You may discuss routine administrative matters with them without violating the Two Year Rule. You may even be permitted to discuss projects/ideas your company has relative to matters that are not current in the pipeline or under consideration by Miami-Dade County.

The anti-lobbying rule means you personally cannot attempt to influence County decision-makers on behalf of a third party (The Allen Group) with respect to items that are currently before them. Both written and verbal communications are covered by the Two Year Rule. Furthermore, if your company were to ask for a private meeting with County decision-makers and you attended the meeting but did not participate, this would still be considered a form of lobbying, as your presence might a difference. If the meeting took place in a public setting, you would be permitted to attend.

- 3) You wish to know whether any other restrictions exist that would bar you from working with other companies with or without County contracts for The Allen Group.

Answer: The Two Year Rule is applicable only to dealings that you might have directly with the County and does not preclude you from lobbying other governments nor does it prohibit you from working with other companies in the areas identified in your e-mail.

If you have any additional questions, please do not hesitate to contact me at your convenience.

Sincerely,

Robert Meyers, Executive Director
 Miami-Dade Commission on Ethics and Public Trust
 (305) 350-0613

From: Roosevelt Bradley [mailto:rbradley@the-allen-group.com]
Sent: Wednesday, October 31, 2007 9:52 AM
To: Meyers, Robert (COE)
Subject: Roosevelt Bradley-The Allen Group, LLC

October 31, 2007

11/6/2007

Mr. Robert Meyers, Executive Director
Miami-Dade County Ethics and Public Trust
19 West Flagler Street, Suite 820
Miami, Florida 33130

Dear Mr. Meyers,

Thank you for taking time to talk with me regarding Miami-Dade County's ethics rules for former county executives. As I indicated during our conversation, I am currently employed as Senior Vice President with The Allen Group, LLC, a construction management consulting firm. The Allen Group, LLC currently serves as a subconsultant to Parsons Brinkerhoff, the prime Program Manager Consultant for Miami-Dade Transit.

To ensure that I do not violate any of the Miami-Dade County ethics rules, I am writing to ask that you provide me with understanding and clarification for the following:

1. As an executive and employee of The Allen Group, LLC, can I manage The Allen Group's scope of work and supervise its employees assigned to the Miami-Dade County projects?
2. Can I meet with Miami-Dade County employees, executives and County Commissioners on behalf of and regarding The Allen Group, LLC business activities?
3. Are there any restrictions that prohibit me as an employee of The Allen Group, LLC from working with other companies with or without County contracts in the areas of community relations, transit operations and maintenance, strategic planning, pre-construction development, construction management and transit oriented development etc?

Very truly yours,
THE ALLEN GROUP, LLC

Roosevelt Bradley
Senior Vice President



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