

March 11, 2008

Francine M. Azel, Vice-President/Treasurer  
Andale Group, LLC  
8725 SW 84<sup>th</sup> St.  
Miami, FL 33173

Via First Class Mail and Fax at 1.866.303.6745

**Re: INQ 08-32**

The Ethics Commission has no jurisdiction over employees of the Miami-Dade County School Board.

Dear Ms. Azel:

On March 11, 2008, you asked if ethical conflicts prevent you from registering as a vendor with Miami-Dade County if you are employed as a teaching assistant with the Miami-Dade County Public Schools. Additionally, you have stated that you have no immediate family members employed by Miami-Dade County.

Based on these facts, your contracting with the County would not violate the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance because you are not employed by the County, but rather by the School Board, which is a state government entity. Furthermore, you have no immediate family members employed by the County.

The legal basis for this opinion can be found at Section 2-11.1 (a) of the Ethics Ordinance. In pertinent part, this section limits application of the County Ethics Code to employees of the *county* and *municipalities within the county*.

Please feel free to contact me if I can be of further assistance.

Sincerely,

Victoria Frigo  
Staff Attorney