

2008-08-09



August 4, 2008

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Dawn E. Addy, VICE CHAIRPERSON
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EXECUTIVE DIRECTOR

MICHAEL P. MURAWSKI
ADVOCATE

ARDYTH WALKER
STAFF GENERAL COUNSEL

William A. Brown, President
Robert S. Bruce, CEO
426 MANAGEMENT GROUP, INC.
22469 SW 103rd Avenue
Cutler Bay, Florida 33190

Dear Mr. Brown:

I am receipt of your e-mail dated July 30, 2008 wherein you ask for an ethics opinion on our official letterhead at the request of the Miami-Dade County Department of Small Business Development.

On June 2, 2008, I e-mailed you an opinion stating that your company may bid on contract opportunities with Miami-Dade County as long as the Aviation Department is not the issuing department and the Aviation Department must not be involved in the oversight, management or regulation of the contract. I further stated in the opinion that you are not permitted to meet with County personnel or appear before any selection committee concerning any possible contract with Miami-Dade County. Provided you abide by these conditions, no conflict of interest exists for you as an employee of the Aviation Department from bidding on County work through your private corporation.

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

Sincerely,

Robert Meyers
Executive Director

Meyers, Robert (COE)

From: Brown, William A. III (Aviation) [WBrown@miami-airport.com]
Sent: Wednesday, July 30, 2008 2:41 PM
To: Meyers, Robert (COE)
Cc: rsbruce27@yahoo.com; fourtwentysixinc@hotmail.com
Subject: RE: Seeking an official opinion

Mr. Meyers,

As you can see by the attached emails, we have previously sought your opinion regarding the development of our small business and our involvement in competitive Miami-Dade County contract opportunities. We sincerely appreciate your opinions regarding our business efforts.

We are now attempting to obtain DBE Certification from the Miami-Dade Department of Small Business Development (SBD). SBD claims that they cannot accept the email correspondences and insists on a signed, "official letter of opinion" which specifically states that there is no conflict of interest in the DBE Certification of our firm, 426 Management Group Inc.; in addition, SBD requests that the "official letter" (on letterhead) also restate our opinion that there is no conflict in our involvement in competitive Miami-Dade County contact opportunities.

Please address this "official letter" to our corporation and its owners:

William A. Brown, President
Robert S. Bruce, CEO
426 MANAGEMENT GROUP, INC.
22469 SW 103rd Avenue
Cutler Bay, Florida 33190

Please note that SBD has given us a ten (10) day deadline to obtain this letter from COE. Based on your prompt responses to our previous inquires, we are confident that you will be able to assist us in a timely manner. Please feel free to contact us if you require any additional information. Thanks you for your assistance.

William A. Brown
Minority Affairs Division
MIAMI-DADE AVIATION DEPARTMENT
(305) 876 - 0745

Robert Bruce
Minority Affairs Division
MIAMI-DADE AVIATION DEPARTMENT
(305) 876 - 7748

From: Meyers, Robert (COE) [mailto:RMEYERS@miamidade.gov]
Sent: Monday, June 02, 2008 11:20 AM
To: Brown, William A. III (Aviation)
Subject: RE: Seeking an official opinion

Mr. Brown,

Under the county's Conflict of Interest and Code of Ethics Ordinance, you may bid on Miami-Dade County contract opportunities provided the Aviation Department is not the issuing department and the Aviation Department must not be involved in the oversight, management or regulation of the contract. As you indicated, you are not permitted to meet with County personnel or appear before any selection committee concerning any possible contract with Miami-Dade County.

7/30/2008

Sincerely,

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

From: Brown, William A. III (Aviation) [mailto:WBrown@miami-airport.com]
Sent: Thursday, May 29, 2008 9:31 AM
To: Meyers, Robert (COE)
Subject: Seeking an official opinion

Mr. Meyers,

I am a Business Development Specialist, with Miami-Dade County, Aviation Department (MDAD). On my own time, is it permissible for me to bid on competitive Miami-Dade County contract opportunities, if MDAD is not an issuer of the contract at any level? I am not involved in any meetings with County personal or committees that are part of the selection processes? And I would have no competitive advantage over other bidders?

I look forward to your response. Thank you for your deliberation.

William A. Brown
MIAMI-DADE AVIATION DEPARTMENT
(305) 876 - 0745

From: Bruce, Robert (Aviation)
Sent: Wednesday, April 30, 2008 9:31 AM
To: Meyers, Robert (COE)
Subject: County Contracts Bidding

Dear Sir:

I am a Miami-Dade County employee working in the capacity of Business Development Specialist at the Miami International Airport (MDAD). Would I be able to bid on competitive County contracts on my own time, as long as MDAD is not an issuer of the contract at any level, and I would have no competitive advantage over other bidders?

Thanks for your kind consideration.

Robert Bruce
305-876-7748

7/30/2008

Meyers, Robert (COE)

INQ 08-917

From: Meyers, Robert (COE)
Sent: Monday, June 02, 2008 11:20 AM
To: Brown, William A. III (Aviation)
Subject: RE: Seeking an official opinion

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Sincerely,

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

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To: Meyers, Robert (COE)
Subject: Seeking an official opinion

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I look forward to your response. Thank you for your deliberation.

William A. Brown
MIAMI-DADE AVIATION DEPARTMENT
(305) 876 - 0745