



Via First Class Mail  
and  
email at [mjurney@teamjai.com](mailto:mjurney@teamjai.com)

**ETHICS COMMISSIONERS**

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ARDYTH WALKER  
STAFF GENERAL COUNSEL

November 7, 2011

Martha C. Journey, President  
JURNEY & ASSOCIATES, INC.  
782 NW 42 Ave., Suite 429  
Miami, FL 33126

**Re: INQ 11-167**

Prohibition on Renewing Polygraph Contract with Police Department  
See Miami-Dade County Ethics Code at Secs. 2-11.1 (c)(2) and (c)(4)

Dear Ms. Journey:

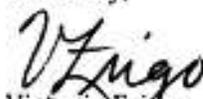
Based on the facts you provided in an email of November 3, 2011, please be advised that the County Ethics Code prohibits your private company, JURNEY & ASSOCIATES, INC., from renewing your polygraph contract with the Miami-Dade County Police Department, unless you receive a waiver from the Board of County Commissioners at a public meeting.<sup>1</sup>

The County Code does not allow immediate family members of County employees, including stepparents, from contracting with the department that employs their relative. In your case, you own JURNEY & ASSOCIATES, INC., and you are the stepparent of Kent C. Journey, Jr., an employee of the Miami-Dade County Police Department. Therefore, you and JURNEY & ASSOCIATES, INC., are prohibited from contracting with the County Police Department.

Only the Board of County Commissioners (not the Ethics Commission) is authorized to waive this prohibition. IF YOU WISH TO SEEK A WAIVER FROM THE BOARD OF COUNTY COMMISSIONERS, YOU MUST FILE A NOTICE OF APPEAL TO THE ETHICS COMMISSION WITHIN TEN DAYS OF RECEIPT OF THIS OPINION.<sup>2</sup> The Ethics Commission will forward your notice to the Clerk of the Board for consideration to be placed on the Board's agenda.

If you have additional questions, please do not hesitate to call our Executive Director, Joe Centorino, at 305 579-2594 or me at 305 350-0601.

Sincerely,

  
Victoria Frigo  
Staff Attorney

copies: Joe Centorino (COE)  
Maria Carballeira (ISD)

<sup>1</sup> The prohibition is found in the Miami-Dade County Code at Sec. 2-11.1 (c)(2).

<sup>2</sup> The waiver requirements are found in the Miami-Dade County Code at Sec. 2-11.1 (c)(4).