

**Meyers, Robert (COE)**

IN2001-19

**From:** Meyers, Robert (COE)  
**Sent:** Thursday, February 19, 2004 5:08 PM  
**To:** Butler, Constance L. (ERD)  
**Subject:** RE: Need an Opinion

Connie,

As I understand your request for opinion, you want to know whether the Florida Martin Luther King Jr. Institute for Nonviolence can be compensated for training it conducts for the County Transit Agency when the Executive Director of the Institute also serves as the Chairman of MMPA. Under the circumstances you have presented, there is nothing in the Code of Ethics Ordinance that would prohibit the County from entering into an agreement with Miami-Dade College to provide this training. In this case, Mr. Jones will not be transacting business directly with the County. Furthermore, the funds are not going directly to Mr. Jones; rather, the funds are being disbursed to his agency.

I would rather not offer an opinion on whether such an arrangement creates an appearance of impropriety. If your office does not feel comfortable going forward with this matter, then I would defer to your judgment. As you know, the Code of Ethics Ordinance does not give the Ethics Commission the authority to offer opinions about appearances of conflicts -- only actual conflicts.

If you need additional information, please contact me at your earliest convenience.

Robert

-----Original Message-----

**From:** Butler, Constance L. (ERD)  
**Sent:** Thursday, February 19, 2004 9:40 AM  
**To:** Meyers, Robert (COE)  
**Subject:** Need an Opinion

As you know, we have partnerships with several local schools to provide academic and other training related services. We recently were requested to provide two workshops for Miami Dade Transit. One of the workshops includes Martin Luther King's Non Violence Training. Because this training is not provided by us, we contacted our partners at Miami Dade College.

The college provides this training through a contractual agreement with Florida Martin Luther King Jr. Institute for Nonviolence. Mr. John T. Jones Jr. is the Executive Director of the institution and he is also the current **Chairman, of (MMA) Metro Miami Action Plan**. Does a conflict exist if Miami-Dade County University contracts with Miami Dade College? We would be invoiced by Miami Dade College; however, I learned the Mr. Jones' institution will probably be the primary receiver of the funds. We need an opinion ASAP because we do not want to enter into an agreement that will compromise the County. Even the perception of improper behavior would concern me. Please advise. Many thanks, CB