



April 22, 1999

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STAFF GENERAL COUNSEL

Mariella M. Carnight
Senior Loan Officer
CTX Mortgage Company
1500 San Remo Avenue
Suite 150
Coral Gables, FL 33146

Dear Ms. Carnight:

The Commission on Ethics and Public Trust considered your request for an advisory opinion at its meeting on April 22, 1999 and rendered its decision based on the facts stated in your letter.

You requested an advisory opinion as to whether you can continue to advertise your mortgage services to county employees through flyers distributed by the Employee Benefits office.

In your letter, you advised the commission that CTX Mortgage Company is a mortgage originator with offices in thirty states. CTX wants to market their services directly to county employees. You want to know if your actions are prohibited by the Conflict of Interest and Code of Ethics ordinance.

The commission found that the Conflict of Interest and Code of Ethics ordinance does not prohibit CTX from distributing flyers advertising their services to county employees. The Conflict of Interest and Code of Ethics ordinance does not ban solicitation by outside entities to county employees. Therefore, CTX Mortgage Company may advertise their services to county employees.

If you have any questions regarding the opinion, please call Robert Meyers, Executive Director at (305) 579-2954 or Ardyth Walker at (305) 579-2653.

Sincerely Yours,

ROBERT MEYERS
Executive Director