



May 11, 2000

Betty Bennett
12500 S.W. 259th Street
Homestead, FL 33022

ETHICS COMMISSIONERS

Kerry E. Rosenthal, Chairperson
Charles A. Hall, Vice Chairperson
Elizabeth M. Iglesias
Knovack G. Jones
Robert H. Newman

RE: REQUEST FOR OPINION 00-86

ROBERT A. MEYERS
EXECUTIVE DIRECTOR

CHRISTOPHER R. MAZZELLA
INSPECTOR GENERAL

ARDYTH WALKER
STAFF GENERAL COUNSEL

Dear Ms. Bennett:

The Commission on Ethics and Public Trust considered your request for an advisory opinion at its meeting on May 4, 2000 and rendered its opinion based on the facts stated in your memorandum.

In your letter, you advised the Commission that you are on loan from the Department of Human Services to the Miami-Dade/Monroe WAGES Coalition. The Wages Coalition is charged with the responsibility of implementing welfare reform and establishing plans for providing services to public assistance recipients as they move from welfare to work. You have been assigned to develop and implement service policies and procedures for the coalition. Lockheed Martin, a WAGES service provider, has contacted you about providing technical assistance to the company as they develop internal procedures and performance measures.

The Commission found that the Conflict of Interest and Code of Ethics ordinance does not preclude you from contracting with Lockheed Martin IMS to provide services. Section 2-11.1(c) only prohibits employees from contracting with their department or on contracts in which they have involvement. The ordinance does not prohibit an employee from contracting with a county contractor to provide services. However, you must receive approval from your department for the outside employment pursuant to 2-11 and file a notice

of said employment with the Department of Elections.

This opinion construes the Miami-Dade Conflict of Interest and Code of Ethics ordinance only and is not applicable to any conflict under state law. Please contact the State of Florida Commission on Ethics if you have any questions regarding possible conflicts under state law.

If you have any questions regarding this opinion, please call the undersigned at (305) 579-2594 or Ardyth Walker, Staff General Counsel at (305) 579-2653.

Sincerely Yours,

A handwritten signature in black ink, appearing to read "Robert Meyers", with a long horizontal flourish extending to the right.

ROBERT MEYERS
Executive Director