



July 26, 2000

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**ARDYTH WALKER**  
STAFF GENERAL COUNSEL

Lawrence Cook  
Miami Dade Police Department  
9105 N.W. 25<sup>th</sup> Street Room 1044  
Miami, FL 33172

**RE: REQUEST FOR ADVISORY OPINION 00-87**

Dear Mr. Cook:

The Commission on Ethics and Public Trust considered your request for an advisory opinion at its meeting on July 25, 2000 and rendered its opinion based on the facts stated in your letter.

You requested an opinion regarding your ability to accept outside employment with a firm that markets services to county employees.

In your letter you advised the Commission that you have been offered outside employment with an insurance company that markets various services to county employees. You would like to know if you may sell the products to county employees if you do not sell the products during work hours.

The Commission found that The Conflict of Interest and Code of Ethics ordinance does not prohibit you from working for a company that markets products and services to county employees. Section 2-11.1(j) provides that an employee may not accept other employment which would impair his or her independence of judgment in the performance of his or her public duties. Since your outside employment probably would not impair your work for the police department, you are not prohibited by

the Conflict of Interest ordinance from accepting the outside employment.

However, you may not solicit business from other members of the Miami-Dade Police Department at any time. Further, you may not solicit other county employees on county property or during working hours and you may not use county equipment in your outside employment. Finally, pursuant to 2-11, you must obtain departmental approval for your work and pursuant to 2-11.1(k)(2), you must file an outside employment report 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 the opinion, please call the undersigned at (305) 579-2954 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