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**ARDYTH WALKER**  
STAFF GENERAL COUNSEL

September 10, 2002

Sandra Walker  
1750 N.W. 175<sup>th</sup> Street  
Miami, FL 33056

**RE: REQUEST FOR ADVISORY OPINION 02-79**

Dear Mrs. Walker:

The Commission on Ethics and Public Trust considered your request for an advisory opinion at its meeting on September 9, 2002 and rendered its opinion based on the facts stated in your letter.

You requested an opinion regarding your outside employment as a financial advisor.

In your letter, you advised the Commission that you are a business consultant and educator on personal finance issues in addition to your work for the Miami-Dade Housing Agency. As a business consultant, you educate groups and individuals on wealth acquisition, business ownership and tax issues. Your clients are solicited through flyers, ads and word of mouth. The cost of the training ranges from \$179 to \$449.

The Family Self-Sufficiency program helps empower persons in public and subsidized housing towards the goal of private home ownership. As Program Administrator, you are responsible for making sure that the program functions according to Federal housing guidelines. You supervise a staff of two

people. The families who participate in the housing program are not involved in the personal finance education business and are not solicited as clients.

The Commission found the Conflict of Interest and Code of Ethics ordinance permits you to engage in outside employment as a personal finance consultant. Section 2-11.1(j) provides that "(n)o person included in the terms defined in subsections b)(1) through (6) shall accept other employment which will impair his or her independence of judgment in the performance of his or her public duties." Since you do not solicit Housing Department clients and there is no overlap between your outside employment and your position with the housing agency, your outside employment does not violate the Conflict of Interest and Code of Ethics ordinance. Therefore, you may continue you work as a personal finance consultant.

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,



ROBERT MEYERS  
Executive Director