



October 29, 2009

ETHICS COMMISSIONERS

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ARDYTH WALKER
STAFF GENERAL COUNSEL

Kent & Martha Jurney, Sr.
JURNEY & ASSOCIATES, INC.
782 NW 42nd Ave., #429
Miami, FL 33126

Via First Class Mail and email at mcjurney@aol.com

Re: INQ 09-174 Registering as a County Vendor

Dear Mr. and Mrs. Jurney:

In correspondence to our office on October 27, 2009, you said that you wish to register your company, JURNEY & ASSOCIATES, INC., as a County vendor.

The facts as we understand them are as follows:

- Your son, Kent C. Jurney, Jr., is employed by the Miami-Dade County Police Department as a police officer.
- JURNEY & ASSOCIATES, INC., is a business owned jointly by you that provides polygraph and investigation services.

It is the opinion of the Ethics Commission staff that JURNEY & ASSOCIATES, INC., may register to contract with the County as long as any contract does not interfere with the full and faithful discharge of your son's duties to the County. This includes the condition that your son will not participate in determining the contract requirements or in awarding the contract. Additionally, none of your son's responsibilities will require him to be involved in the contract in any way including, but not limited to, its enforcement, oversight, administration, amendment, extension, termination, or forbearance. Finally, your son may not be employed by any County department or agency that will enforce, oversee, or administer the contract. This means that, **as long as your son is employed by the Miami-Dade County Police Department, your company may not contract with the Miami-Dade County Police Department.**

If any of the facts you have presented change, or if you have further questions, please do not hesitate to contact me at 305 350-0601.

Sincerely,

VICTORIA FRIGO
Staff Attorney