



MIAMI-DADE COMMISSION ON ETHICS AND PUBLIC TRUST

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MEMORANDUM

TO: Honorable Danielle Cohen Higgins, District 8 Commissioner
Miami-Dade Board of County Commissioners

FROM: Nolen Andrew Bunker, Staff Attorney
Miami-Dade Commission on Ethics and Public Trust

SUBJECT: INQ 2025-51; Section 2-11.1(j), Conflicting employment prohibited; Section 2-11.1(h), Prohibition on use of confidential information; Section 2-11.1(g), Exploitation of official position prohibited; Section 2-11.1(m), Certain appearances and payment prohibited; Section 2-11.1(c), Prohibition on transacting business within the County; Section 2-11.1(d), Further prohibition on transacting business with the County; Section 2-11.1(u), Prohibition on certain business transactions; Section 2-11.1(p), Recommending professional services.

DATE: May 30, 2025

CC: All COE Legal Staff; Gerald Sanchez, First Assistant County Attorney, Miami-Dade County Attorney's Office

Thank you for contacting the Miami-Dade Commission on Ethics and Public Trust and seeking guidance regarding possible conflicts of interest arising from your interest in engaging as “of counsel” with a law firm considering doing business in Miami-Dade County.

Facts

Commissioner Cohen Higgins was elected to the Miami-Dade Board of County Commissioners (“BCC”) in August 2022, and she serves as the Commissioner for District 8.¹ As such, she is a member of the County’s legislative body and, along with her colleagues on the Commission, is responsible for setting policies and establishing laws for the County.²

¹ See *Commissioner Danielle Cohen Higgins*, DISTRICT 8, <https://www.miamidade.gov/global/government/commission/district08/home.page> (last visited May 30, 2025).

² See *Governance*, ABOUT THE BOARD OF COUNTY COMMISSIONERS (BCC), <https://www.miamidade.gov/global/government/commission/about-bcc.page> (last visited May 30, 2025).

Commissioner Cohen Higgins is an attorney by profession, having been admitted as a member of the Florida Bar in 2006. She is the founder and manager of The Cohen Law Group, LLC, a Florida limited liability company. Through The Cohen Law Group, LLC, she represents entrepreneurs, chief executive officers (“CEOs”), start-up founders, and other business sector professionals in commercial litigation.³

Commissioner Cohen Higgins is considering entering into a relationship with a law firm as “of counsel.” The term “of counsel” has broadened from its historical usage and is now used to identify an attorney who maintains a close, continuing relationship with a firm, but is neither a partner, an associate, nor a shareholder. *See* Fla. Bar Ethics Op. 00-1.⁴ While the exact parameters of the contemplated “of counsel” relationship are unknown at this time, the Commissioner’s work for the law firm will primarily involve business development. Additionally, for purposes of this opinion we will anticipate that Commissioner Cohen Higgins will not have any ownership interest or equity in the law firm, but that she will be compensated via a salary from the law firm.

Issue

Whether any prohibited conflict of interest may exist between Commissioner Cohen Higgins’ County service and her proposed engagement as “of counsel” with a law firm doing business in Miami-Dade County.

Analysis

This inquiry involves several sections of the Miami-Dade Conflict of Interest and Code of Ethics Ordinances (“County Ethics Code”), each of which is analyzed in turn below:

i. Section 2-11.1(j) – Conflicting employment prohibited

The County Ethics Code prohibits County Commissioners from accepting outside employment, “which would impair his or her independence of judgment in the performance of his or her public duties.” County Ethics Code § 2-11.1(j). Outside employment is considered “any non-County employment or business relationship in which the County employee provides a personal service to the non-County employer that is compensated or customarily compensated.” RQO 17-03. Several factors are considered to determine whether a potential conflict of interest exists between an individual’s County position and his or her outside employment, including: the nexus between the public duties and the outside employment; whether the individual has decision-making authority

³ *See Civil Trial, Commercial & Business Litigation Representation*, HOME, <https://cohenlawpa.com/> (last visited May 30, 2025).

⁴ “An ‘of counsel’ relationship is more than a mere referral arrangement. A lawyer may be considered ‘of counsel’ if he or she has a regular, continuing relationship with a lawyer or firm in a capacity other than that of partner or associate.” *See What is meant by the term ‘of counsel’?*, FREQUENTLY ASKED ETHICS QUESTIONS, <https://www.floridabar.org/ethics/etfaq/> (last visited May 30, 2025). Note, if you continue your work for The Cohen Law Group, LLC, while also engaged as “of counsel” with another firm, additional Rules Regulating the Florida Bar may apply. *See id.*

over the same subject matter that the outside employment concerns; whether the individual solicits business or customers in the same area over which he or she has jurisdiction; whether the individual will come into contact with the same or similar people or entities in both his or her public position and outside employment; and whether the public entity with which the individual serves funds or has a contract with his or her outside employer. *See* RQO 17-01; INQ 21-66.

However, there is no blanket prohibition under the County Ethics Code on a County Commissioner from accepting outside employment with an entity that does business with the County, provided no other section of the County Ethics Code would prohibit said employment. *See* RQO 21-01; INQ 22-158.

In practice, a Miami-Dade County Commissioner did not have a prohibited conflict of interest in her outside employment as the co-host of a radio program that delivered broadcast content on local issues, including local governance policy and legislative issues, as well as interviewing County officials and staff other than fellow County Commissioners. *See* RQO 21-01. Additionally, a Miami-Dade County Commissioner did not have a prohibited conflict of interest in his outside employment as Chief of External Affairs for a nonprofit entity, even though the nonprofit primarily received funding from The Children’s Trust (“TCT”) – a Miami-Dade County entity – because TCT funding resolutions were not reviewed or approved by the BCC and because he would not engage in outreach or funding solicitation activities in Miami-Dade County. *See* INQ 21-66. Similarly, a Miami-Dade County Commissioner did not have a prohibited conflict of interest in her outside employment as the compensated Executive Director of a not-for-profit corporation that advocated on behalf of marginalized residents and provided support services to the same population, provided she does not receive compensation from any County grants awarded to her employer. *See* INQ 22-158.

Here, based on the facts provided, it does not appear that the County Ethics Code would prohibit Commissioner Cohen Higgins from engaging in outside employment as “of counsel” with a law firm and engage in business development for the firm, provided that she does not engage with prospective clients who are doing business with the County or who have a matter before the County, and provided that she does not receive any compensation from the firm in relation to work performed for clients doing business with the County. *See* RQO 21-01; RQO 17-01; INQ 22-158; INQ 21-66.

Furthermore, while the Ethics Commission does not have jurisdiction over State law, it cannot be ignored. Section 112.313(7)(a), Florida Statutes, provides that:

No public officer or employee of an agency shall have or hold any employment or contractual relationship with any business entity or any agency which is subject to the regulation of, or is doing business with, an agency of which he or she is an officer or employee . . . nor shall an officer or employee of an agency have or hold any employment or contractual relationship that will create a continuing or frequently recurring conflict between his or her private interests and the performance of his or her public duties or that would impede the full and faithful discharge of his or her public duties.

The first part of Section 112.313(7), Florida Statutes, prohibits a County Commissioner from having a contractual relationship with any business entity regulated by or doing business with the County Commission. *See* CEO 07-13. As an attorney employed by a law firm as “of counsel,” Commissioner Cohen Higgins will be engaged in a contractual relationship with the law firm. Thus, if the law firm seeks to engage in business directly with the County, this provision of State law would likely prohibit the Commissioner’s employment with them. *See id.* To the extent that the law firm’s clients may do business with the County or be regulated by the County and its agencies, the Florida Ethics Commission has opined that this would not give rise to a violation of the first part of Section 112.313(7), Florida Statutes. *See id.* (citing CEO 00-14; CEO 92-2).

The second part of Section 112.313(7), Florida Statutes, prohibits a County Commissioner from having any contractual relationship that would create a continuing or frequently recurring conflict with his or her public duties, or that would impede the full and faithful discharge of his or her public duties.

This provision establishes an objective standard which requires an examination of the nature and extent of the public officer’s duties together with a review of his private interests to determine whether the two are compatible, separate and distinct, or whether they coincide to create a situation which “tempts dishonor.”

CEO 07-13. The Florida Ethics Commission has opined that a City Commissioner had a prohibited conflict of interest that impeded the performance of his public duty when either he or his law firm represented a client before the City Commission, regardless of whether or not he recused himself from the matter. *See id.* The Florida Ethics Commission further noted that:

We have also found that such a conflict would exist where the official serves in an “of counsel” capacity to his firm. Although as an “of counsel” attorney you would not have a contractual relationship with the firm’s clients, [he] would still have a contractual relationship with the firm itself, and therefore a duty of loyalty to the firm’s clients which would create a conflict were [he] called upon to make a decision when the firm was representing such a client.

Id.; *see also* CEO 09-10 (finding that a County Commissioner had a prohibited conflict of interest that prevented him from engaging in outside employment as “of counsel” to a law firm that represented clients before the County Commission because his contractual relationship with the firm caused him to owe a duty of loyalty to the firm’s clients).

However, the Florida Ethics Commission concluded that the same prohibited conflict of interest discussed above did not apply when the law firm represented clients before other County or City boards. *See* CEO 09-10, n.6; CEO 07-13.

Here, it appears that State law would not prohibit Commissioner Cohen Higgins from engaging in her proposed outside employment with the law firm, provided that neither she nor any lawyer from the law firm represent any client in any matter before the BCC *See* CEO 09-10; CEO 07-13. However, the Ethics Commission cannot provide an authoritative interpretation of State law, and Commissioner Cohen Higgins is encouraged to request an opinion from the Florida Ethics Commission regarding this matter.

ii. Section 2-11.1(h) – Prohibition on use of confidential information

The County Ethics Code provides that no County Commissioner shall:

accept employment or engage in any business or professional activity which he or she might reasonably expect would require or induce him or her to disclose confidential information acquired by him or her by reason of his or her official position, nor shall he or she in fact ever disclose confidential information garnered or gained through his or her official position with the County, nor shall he or she ever use such information, directly or indirectly, for his or her personal gain or benefit.

County Ethics Code § 2-11.1(h).

In practice, a County Commissioner could not use or disclose confidential information acquired as a result of her County position to benefit her outside employer – a radio station that covered local news. *See* RQO 21-01.

Here, because Commissioner Cohen Higgins’s job responsibilities appear to be unrelated to her County services, it does not appear that she will be engaged in activity that would require or induce her to disclose confidential information acquired due to her County service. However, she should not engage with any potential clients of the law firm who have business with or before the BCC, and she further may not disclose any confidential information acquired by virtue of her County position to her law firm colleagues or any law firm client. *See* County Ethics Code § 2-11.1(h); RQO 21-01.

iii. Section 2-11.1(g) – Exploitation of official position prohibited

The County Ethics Code prohibits a County Commissioner from using or attempting to use, “his or her official position to secure special privileges or exemptions for himself or herself or others” County Ethics Code § 2-11.1(g). One of the primary rationales underlying this provision of the County Ethics Code is that a public officer or employee may not use his or her official position to secure the use of public resources for private use. *See* C24-13-05, *Letter of Instruction* (instructing that a City of Doral Councilwoman must take care to separate her private employment as an attorney and her public work for the City). A Commissioner may not use his or her official title, nor may he or she use any County resource, such as stationery and e-mail, to promote or further a private for-profit business. *See id.*; *see also* INQ 18-179 (a City of South Miami Commissioner may not use his title or position to further the interests of his private business).

In practice, a County Commissioner who served as the volunteer director of a non-profit organization was prohibited from using his public position to favor the organization and needed to take particular care when soliciting grant funding for the organization. *See* INQ 21-10. Furthermore, a candidate for the City of Opa-Lock City Commission was advised that, if elected as a City Commissioner, he should keep his employment separate from his City service, including refraining from utilizing his official Commissioner title on his business cards or using his official title while performing his duties for his private employer. *See* INQ 18-156; *see also* INQ 16-277 (a member of a Community Council may not use his title while conducting his private business as the owner and operator of a private electrical company).

Here, Commissioner Cohen Higgins may not use her title when engaging in her proposed outside employment with a law firm as “of counsel,” nor may she use any County resource, including, but not limited to, her County letterhead or e-mail address. *See* C24-13-05; INQ 18-179; INQ 18-156. Furthermore, the Commissioner’s work for the law firm must occur outside of her County work, and she may not use her County offices to conduct work for the law firm. *See id.*

iv. Section 2-11.1(m)(1) – Certain appearances and payment prohibited

The County Ethics Code provides that no County Commissioner shall:

appear before any County Board or agency and make a presentation on behalf of a third person with respect to any license, contract, certificate, ruling, decision, opinion, rate schedule, franchise, or other benefit sought by the third person. Nor shall such person receive compensation, directly or indirectly or in any form, for services rendered to a third person, who has applied for or is seeking some benefit from the County or a County agency, in connection with the particular benefit sought by the third person. Nor shall such person appear in any court or before any administrative tribunal as counsel or legal advisor to a party who seeks legal relief from the County or a County agency through the suit in question.

County Ethics Code § 2-11.1(m)(1).

In essence, a County Commissioner may not appear before any County board on behalf of their employer or client. *See* RQO 21-01 (a County Commissioner may not appear before any County board on behalf of her outside employer); RQO 12-13 (a County Commissioner may not appear before any County board on behalf of an entity with whom he is doing business). This prohibition is broad and intended “to prevent cronyism by leveling the playing field for citizens who interact with their government,” and prohibits County Commissioners from engaging in conversations with County officials or staff on behalf of third parties. RQO 12-10; *see also* INQ 22-158.⁵

⁵ However, a City of Coral Gables Commissioner who owns a permit expediting company could, either directly or through her employees, engage with the City “as long as the contacts or representation are limited

In addition to appearances, the County Ethics Code also prohibits a County Commissioner from receiving compensation, either directly or indirectly, for services rendered to a third party who is seeking some benefit from the County. *See* INQ 22-158 (a County Commissioner is prohibited from receiving any compensation from her non-profit employer in connection with the application for grant money from the County).

Here, Commissioner Cohen Higgins may not appear before any County board on behalf of the law firm with which she will be employed as “of counsel,” nor may she appear before any County board on behalf of any of the law firm’s clients. *See* County Ethics Code § 2-11.1(m)(1); RQO 21-01; RQO 12-13; RQO 12-10. However, other lawyers who work for the law firm with whom Commissioner Cohen Higgins will be employed as “of counsel” may appear before County boards, other than the BCC, to represent third parties, provided that Commissioner Cohen Higgins will not be compensated, directly or indirectly, for the services rendered. *See* RQO 07-08 (under the County Ethics Code, lawyers working at the same law firm as a City of Miami Beach City Commissioner may represent third parties before the City).⁶ Finally, while Commissioner Cohen Higgins’ work with the law firm will primarily involve business development, the County Ethics Code also prohibits her from representing, advising, or otherwise appearing in any Court or other administrative tribunal on behalf of a third party whose interests are adverse to the County’s interests. *See* County Ethics Code § 2-11.1(m)(1).

v. Sections 2-11.1(c) & (d) – Prohibitions on transacting business within the County

The County Ethics Code prohibits County Commissioners from entering into any contract or transacting any business with Miami-Dade County or any person or agency acting for Miami-Dade County. *See* County Ethics Code § 2-11.1(c)(1); RQO 23-01. This broad prohibition also applies to firms, corporations, partnerships, and other business entities in which the County Commissioner has a controlling financial interest. *See* County Ethics Code § 2-11.1(d).

Here, it does not appear that these provisions of the County Ethics Code would apply because the law firm is not contemplating contracting directly with Miami-Dade County. Regardless, even if the law firm were to consider contracting with the County, Commissioner Cohen Higgins will not have a controlling financial interest in the law firm, such that these provisions of the County Ethics Code would not prohibit such a transaction. *See* County Ethics Code §§ 2-11.1(c), (d). Nevertheless, if the law firm were to consider transacting business with the County, several other provisions of the County Ethics Code would apply, and an opinion regarding the specifically contemplated contract should be sought when and if this situation arises.

to ministerial matters or simple informational requests.” RQO 24-02; *but see* RQO 08-30 (a County Commissioner may not sign a third party’s funding application that is appearing before a County board).

⁶ In RQO 07-08, the Ethics Commission concluded that Section 2-459 of the City of Miami Beach Code was more restrictive than Section 2-11.1(m) of the County Ethics Code, and that the City of Miami Beach Code did prohibit lawyers from the law firm that employed a City Commissioner from representing third parties before the City, regardless of whether the City Commissioner was employed as “of counsel.”

vi. Section 2-11.1(u) – Prohibition on certain business transactions

The County Ethics Code provides that no County Commissioner shall “enter into a business transaction with any person or entity that has a contract with Miami-Dade County or any shareholder, partner, officer, director or employee of said contractor, unless said business transaction is an arm’s length transaction made in the ordinary course of business.” County Ethics Code § 2-11.1(u). An “arms-length” transaction means one made at market rates and without any special consideration or special terms not generally available to other purchasers, vendors, brokers, or, where applicable, the general public. *See* INQ 14-100.

In practice, the Mayor of the City of North Miami could contract with local radio stations that were City vendors in order to purchase advertising for his law firm, provided that the contracts were made at “arms-length” and “in the ordinary course of business.” RQO 12-05. However, the City Attorney for the City of Sweetwater could not enter into a business partnership with a City vendor because any such partnership could not be considered an “arms-length transaction” and, as such, would be prohibited by the County Ethics Code. *See* INQ 14-40. Similarly, a Chief of Staff/Deputy City Manager for the City of Sweetwater could not enter a contract to represent the interests of and lobby on behalf of a City vendor, even if the activities took place in another municipality, because this arrangement could not be reached or maintained at arms-length. *See* INQ 18-187.

Here, it does not appear that this provision of the County Ethics Code would apply to prohibit Commissioner Cohen Higgins from working with the law firm as “of counsel” because the law firm is not seeking to do business with the County. Furthermore, because Commissioner Cohen Higgins will not have any ownership interest in the law firm, this provision of the Ethics Code would not apply to restrict the law firm’s contracts with County vendors. However, the Commissioner should take care when engaging in her proposed business development work for the firm to ensure that any contracts or other business arrangements negotiated by her on behalf of the firm constitute “arms-length” transactions to avoid any appearance of impropriety. *See* County Ethics Code § 2-11.1(u); RQO 12-05; INQ 18-187.

vii. Section 2-11.1 (p) – Recommendation of professional services

The County Ethics Code provides that no County Commissioner shall:

recommend the services of any lawyer or law firm, architect or architectural firm, public relations firm, or any other person or firm, professional or otherwise, to assist in any transaction involving the County or any of its agencies, provided that such recommendation may properly be made when required to be made by the duties of office and in advance at a public meeting attended by other County officials, officers or employees.

County Ethics Code § 2-11.1(p).

The intent of Section 2-11.1(p) of the County Ethics Code “is to prevent cronyism that might otherwise tolerate the funneling of work by government officials and employees to

nongovernmental cohorts.” RQO 09-14 (declining to opine whether a city attorney could recommend a private attorney to a management-level city employee challenging a city disciplinary action). Furthermore, Section 2-11.1(p) “helps ensure that individuals with transactions before their government are being heard on a level playing field and not disadvantaged because they lack ‘insider information’ about who can best represent them.” *Id.*

In practice, a City of Miami Gardens Councilman could not recommend a current campaign staffer as a municipal vendor because such a recommendation would be in his discretionary capacity, and not otherwise required by the duties of his office. *See* INQ 19-124.

Here, Commissioner Cohen Higgins may not recommend the services of the law firm to any private company or individual who is conducting any transaction involving the County or any of its agencies. *See* County Ethics Code § 2-11.1(p). As such, the Commissioner must take care when developing business for the law firm to ensure she does not recommend or otherwise encourage any potential client to hire the firm in relation to any matter that the potential client may have that involves the County government or any of its agencies. *See id.*; INQ 19-124.

vii. Section 2-11.1(d) – Voting Conflicts

The County Ethics Code provides that no County Commissioner shall:

vote on or participate in any way in any matter presented to the Board of County Commissioners if said person has any of the following relationships with any of the persons or entities which would be or might be directly or indirectly affected by any action of the Board of County Commissioners: (i) officer, director, partner, of counsel, consultant, employee, fiduciary or beneficiary; or (ii) stockholder, bondholder, debtor, or creditor, if in any instance the transaction or matter would affect the [County Commissioner] . . . in a manner distinct from the manner in which it would affect the public generally.

County Ethics Code § 2-11.1(d). This voting conflict provision is stricter than State law, which prohibits a County Commissioner from voting on matters that “would inure to his or her special private gain or loss.” Fla. Stat. § 112.3134(3)(a); *see* INQ 20-18.

In practice, a Councilmember for the City of Hialeah who started his own law firm had a prohibited conflict of interest if his firm represented any client on a matter before the City Council because, even if he was not the attorney who represented the client, there was a reasonable possibility that he would or might profit or be enhanced by the action due to the potential impact on his firm. *See* INQ 20-18. This same analysis applied even if a collaborating or partnering firm represented the client before the City Council. *See id.* Finally, there likely would still have been a prohibited conflict on the matter even if his or a partnering firm did not represent the client on the matter before the City Council because of the relationship that his firm had with the client. *See id.*

Similarly, a Mayor of the City of Miami who worked as “of counsel” for a law firm had a prohibited conflict of interest if his law firm represented any client on a matter before the City Commission because he had an enumerated relationship – “of counsel” – due to his relationship with the law firm and he would or might be directly or indirectly affected by the City Commission’s action. *See* INQ 19-113. Additionally, the Mayor may still have had a prohibited conflict of interest if another law firm represented his law firm’s client before the City Commission because his participation in the matter before the City Commission could help or hurt an existing client of his law firm, which represented a possible enhancement of his own position with his law firm, creating a reasonable probability that he would or might directly or indirectly profit or be enhanced by his official action. *See id.*

However, when a client of a municipal official’s law firm has a matter before the municipal legislative body on which the municipal official serves and the law firm is not representing the client on that matter, the analysis to determine whether there is a prohibited conflict of interest will depend on various factors, including: a) the importance of the client to the law firm; b) the nature of the business or financial relationship between the law firm and the client; c) the size of the law firm and the number of clients it has; d) the extent to which the municipal official is familiar with the client; e) the remoteness, geographical or otherwise, of the client from the law firm and practice in which the municipal official is engaged; and f) the visibility of the municipal officer in the law firm’s practice; . *See* INQ 20-18; INQ 19-113; INQ 17-277 (addressing potential voting conflicts of a City of Miami City Commissioner employed as “of counsel” with a law firm whose clients appeared before the City).

Here, Commissioner Cohen Higgins will have a prohibited voting conflict that will require her to recuse herself from any matter where the law firm with whom she will be employed as “of counsel” represents a client before the BCC. *See* INQ 20-18; INQ 19-113. Additionally, she will likely have a prohibited voting conflict if that client appears before the BCC on any other matter, regardless of whether the law firm with whom she will be employed as “of counsel” represents the client on that matter because they are still a current client of the law firm. *See* INQ 20-18; INQ 19-113; INQ 17-277. However, a fact-intensive analysis pursuant to several factors would be needed to determine if a prohibited voting conflict would arise in this scenario, where the law firm client appears before the BCC on a matter on which the law firm does not represent the client and is not otherwise involved. *See id.* Commissioner Cohen Higgins should also seek guidance if a recent client of the law firm has a matter that comes before the BCC. *See* INQ 21-143 (Town of Surfside Councilman should seek an ethics opinion before voting on matters involving recent clients).

In circumstances where there is a prohibited voting conflict, Commissioner Cohen Higgins must follow the procedure prescribed by ordinance: 1) publicly announce at the meeting the nature of the conflict before the matter is heard, 2) absent herself from the Commission chambers during that portion of the meeting when the matter is considered, and 3) file a written disclosure of the nature of the conflict with the Clerk of the Board within fifteen (15) days after the vote. *See* County Ethics Code § 2-11.1(d); INQ 17-277.

Opinion

Based on the facts presented here and discussed above, Commissioner Cohen Higgins does not have a prohibited conflict of interest that would prevent her from engaging in the proposed outside employment as “of counsel” to a law firm with her work focused primarily on business development, provided that she abides by the restrictions discussed above. However, the restrictions prescribed by Section 112.313(7)(a), Florida Statutes, may give rise to a prohibited conflict of interest that would preclude her from engaging in the proposed outside employment if the law firm represents any clients before the BCC. *See* CEO 09-10; CEO 07-13. For an authoritative interpretation of Florida law, the Commissioner should contact the Florida Ethics Commission.

This opinion is based on the facts presented and is limited to an interpretation of the County Ethics Code only. If these facts change, or if there are any further questions, please contact the above-named Staff Attorney.

Other conflicts may apply based on County directives or under state law. Questions regarding possible conflicts based on County directives should be directed to the County Attorney’s Office. For an opinion regarding Florida ethics law, please contact the Florida Commission on Ethics, P.O. Drawer 15709, Tallahassee, FL 32317, phone number (850) 488-7864, <http://www.ethics.state.fl.us/>.

INQs are informal opinions provided by the legal staff after review and approval by the Executive Director and/or General Counsel. INQs deal with opinions previously addressed in public session by the Miami-Dade Commission on Ethics and Public Trust or within the plain meaning of the County Ethics Code. RQOs are opinions provided by the Ethics Commission when the subject matter is of great public importance or where there is insufficient precedent. While this is an informal opinion, covered parties that act contrary to this opinion may be subject to investigation and a formal Complaint filed with the Ethics Commission.