



## MIAMI-DADE COMMISSION ON ETHICS AND PUBLIC TRUST

Overtown Transit Village North  
701 Northwest 1<sup>st</sup> Court · 8<sup>th</sup> Floor · Miami, Florida 33136  
Phone: (305) 579-2594 · Facsimile: (305) 579-0273  
Website: [ethics.miamidade.gov](http://ethics.miamidade.gov)

---

### MEMORANDUM

---

**TO:** Robert Smith  
Special Projects Administrator II  
CareerSource South Florida

**FROM:** Etta Akoni, Assistant General Counsel  
Miami Dade County Commission on Ethics and Public Trust

**SUBJECT:** INQ 2025-55, Section 2-11.1(c), Limitations on Contracting with the County

**DATE:** June 12, 2025

**CC:** All COE Legal Staff; Melissa Gallo, Assistant County Attorney, Miami-Dade County Attorney's Office

---

Thank you for contacting the Miami-Dade Commission on Ethics and Public Trust and requesting our guidance regarding potential conflicts of interest that could follow from the award of South Florida Workforce Investment Board Out of School Year-Round Youth Services Contract to Affirming Youth Foundation, Inc.

Facts:

The South Florida Workforce Investment Board d/b/a CareerSource South Florida (SFWIB, CareerSource, or Board), is one of 24 Local Workforce Development Boards (LWDB) in the State of Florida. The SFWIB is a governmental agency and instrumentality of Miami-Dade County, subject to the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance ("County Ethics Code").

The SFWIB, through its competitive procurement process, solicited proposals from select organizations to develop and fully implement a menu of services to qualified Out of School (disconnected) Youth through Request for Proposal (RFP) #01-OSY 2025-2028. The role of the Youth Services Provider(s) is to oversee, maintain compliance and provide services to youth that includes year-round education, short-term training and employment programs to Workforce

Innovation and Opportunity Act (WIOA) eligible low-income/economically disadvantaged and high-risk youth ages 16-24 residing in Miami-Dade County.

CareerSource received several responses to the RFP, including a response from Affirming Youth Foundation, Inc. Affirming Youth Foundation, Inc. is a 501 (c)(3) Nonprofit organization established in 2011.<sup>1</sup> On Affirming Youth Foundation, Inc.'s Annual Corporate Report filed on March 14, 2025<sup>2</sup>, Ronald Mumford was listed as an Officer<sup>3</sup> along with two (2) other persons: Jonathan Spikes, listed President and Registered Agent, and Jaswant Singh, listed as Treasurer. Additionally, on the Affirming Youth Foundation, Inc. website, Ronald Mumford is listed on the "Visionary Leadership" page with a picture of himself just below the title "Program Manager," which is followed by a brief synopsis of his qualifications and experience.<sup>4</sup> The other individuals listed on the "Visionary Leadership" page of the Affirming Youth Foundation, Inc. website are Jonathan Spikes (Executive Director), Joy J. Davis (Licensed Clinical Social Worker), Chaundra Whitehead (Project Manager), and Isnnavys Perez (Master of Public Health Policy and Management-Intern), who appear to be employees of the organization.

Ronald Mumford is also an employee of CareerSource South Florida. Specifically, Mr. Mumford is a Youth Programs Manager (Special Projects Administrator 2). In that role, Mr. Mumford oversees the performance requirements of CareerSource South Florida youth contractors and was involved in the creation of the Out of School (disconnected) Youth RFP #01-OSY 2025-2028.

#### Issue:

Whether any conflicts of interest would result from the award of the CareerSource South Florida RFP #01-OSY 2025-2028 to Affirming Youth Foundation, Inc., pursuant to the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance, due to Ronald Mumford's employment with the CareerSource South Florida and his employment and board service with Affirming Youth Foundation, Inc. for the same or similar services in both positions.

#### Analysis

Generally, sections 2-11.1 (c) and (d) of the County Ethics Code permit County employees to transact business with the County individually or through a firm, corporation, partnership, or business entity in which the employee or any member of his immediate family has a controlling

---

<sup>1</sup> Pursuant to the Articles of Incorporation filed with the State of Florida, Department of State, Division of Corporations on November 16, 2011 (file number N11000010735), this entity was originally named Jonathan Spikes Foundation, Inc.

<sup>2</sup> 2025 Florida Not For Profit Corporation Annual Report filed March 14, 2025, document number # N11000010735, filing number 2565999148CC.

<sup>3</sup> At the time of this opinion, Ronald Mumford and his supervisors have not asked the Miami-Dade County Commission on Ethics and Public Trust to opine on any conflicts of interest relating to his outside employment with Affirming Youth Foundation, Inc.

<sup>4</sup> [www.affirmingyouth.org/our-team/](http://www.affirmingyouth.org/our-team/) last visited June 11, 2025.

financial interest, direct or indirect, so long as the contract does not interfere with the full and faithful discharge of the County employee's duties, the County employee does not participate in negotiating or awarding the contract, and the County employee's job duties will not require him or her to be involved with enforcing or overseeing the contract. Additionally, the County Ethics Code prohibits a County employee from transacting business with the County department for which he or she, or one of their immediate family members, works. Specifically,

[the limited exclusion from the general prohibition on County employees contracting with the County] shall not be construed to authorize an employee or his or her immediate family member to enter into a contract with Miami-Dade County or any person or agency acting for Miami-Dade County, if the employee works in the county department which will enforce, oversee or administer the subject contract.

County Ethics Code § 2-11.1(c)(2).

While there is no indication that Mr. Mumford owns or has a controlling financial interest in Affirming Youth Foundation, Inc., in prior ethics opinions the limitations of sections 2-11.1 (c) and (d) of the County Ethics Code have been extended to non-profit board members who are meaningfully involved in the operations of the non-profit. For instance, in INQ 24-115, Miami Knights Optimist, a non-profit youth organization, whose President was a Train Operator for the Miami-Dade County Department of Transportation and Public Works, had to adhere to limitations of the County Ethics Code due to their President's County employment. Similarly, in INQ 17-279, the Executive Director of the Optimist Foundation of Greater Goulds, a non-profit foundation, was a Councilwoman for Miami-Dade County Community Council 15, and her husband also served on the board. Due to the Councilwoman position with Miami-Dade County and her and her husband's roles with the Optimist Foundation, the Optimist Foundation was required to follow the County Ethics Code in its interactions with Miami-Dade County. In both above referenced prior Ethics opinions, board leadership by a county employee in a non-profit organization subjected the non-profit organization to contractual restrictions enumerated in sections 2-11.1 (c) and (d) of the County Ethics Code. In the instant matter, Mr. Mumford's dual role as an officer of the board and Program Manager creates a similar circumstance to the non-profit officers in INQ 24-115 and INQ 17-279, as he is meaningfully involved in the operations of the non-profit and a part of its leadership team.

Therefore, Mr. Mumford's dual role as an employee of CareerSource South Florida and Officer and employee of Affirming Youth Foundation, Inc., subjects Affirming Youth Foundation, Inc. to the contractual restrictions enumerated in sections 2-11.1 (c) and (d) of the County Ethics Code. *See* INQ 22-04 (A Northwest 7th Avenue Community Redevelopment Agency board member was prohibited from any actions through his private company wherein he would receive a financial

benefit or participate in a project resulting from recommendations made by his board/CRA); INQ 23-25 (a Miami-Dade County Department of Transportation and Public Works traffic engineer could not contract to provide engineering services through his private company to the County department that employs him); INQ 25-27 (The County's Climate Tech and Economic Innovation Manager may not contract with his own department, through his private company, to provide consultations consistent with his current role, and may not negotiate said contract while employed with Miami-Dade County. Additionally, he may not disclose or use any confidential or proprietary information acquired as a result of his past County service to derive any personal benefit); *see also* RQO 11-29; INQ 11-167. Thus, Affirming Youth Foundation, Inc. cannot contract with the department that employs Mr. Mumford (CareerSource South Florida), cannot interfere with the full and faithful discharge of Mr. Mumford's duties to Miami-Dade County, Mr. Mumford cannot participate in negotiating or awarding any contract to Affirming Youth Foundation, Inc., and Mr. Mumford's job duties must not require him to be involved with enforcing or overseeing any contract involving Affirming Youth Foundation, Inc.

Moreover, due to the sensitivity of the procurement process and the need to sustain public confidence in it, the Ethics Commission also opines whether there may be an appearance of impropriety. *See* Miami-Dade County Code § 2-1067; Ethics Commission Rule of Procedure § 2.1(b). "In all procurement matters, appearances of integrity and fairness are paramount, [as there is a] 'need for the County to conduct its procurement operations in a manner that will not create appearances of impropriety, favoritism or undue influence . . . [which] may require a higher standard of ethics . . .'" INQ 17-131 (quoting INQ 14-242). Considering Mr. Mumford's role in creating the CareerSource South Florida's RFP #01-OSY 2025-2028 and his anticipated role in the management of the contract once awarded, an award of the RFP to Affirming Youth Foundation, Inc., an organization with which he has an enumerated relationship, would present appearance of impropriety as it could directly benefit from his actions in his role with CareerSource South Florida. *See* INQ 20-128 and INQ 21-118.

### Opinion

Based on the facts presented here and discussed above, Affirming Youth Foundation, Inc. cannot contract with CareerSource South Florida, as one of Affirming Youth Foundation, Inc.'s three (3) board members are employed by CareerSource South Florida. *See* County Ethics Code § 2-11.1(c). Therefore, awarding CareerSource South Florida's RFP #01-OSY 2025-2028 to Affirming Youth Foundation, Inc. would be prohibited by the Miami-Dade County Conflict of Interest and Code of Ethics Ordinance.

This opinion is based on the facts presented. If these facts change, or if there are any further questions, please contact the above-named agency counsel. Other conflicts may apply under state law. 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.*