

Commission on Ethics and Public Trust

June 30, 1998

Mr. Herman Rackley
C/o Richmond-Perrine Realty
14660 Lincoln Blvd.
Miami, Florida 33176

Re: Conflict of Interest Opinion

Dear Mr. Rackley:

The Commission on Ethics and Public Trust is in receipt of your letter dated June 23, 1998, in which you request a Conflict of Interest Opinion. In your letter you indicate that you are a member of the Affordable Housing Advisory Board of the Miami-Dade County Housing Agency. In your letter you further state as follows:

“Several developers who receives funds from the Housing Agency has requested my assistance in developing a potential client base for them. Since I am on the board and vote on matters concerning these developers, would it be construed as a conflict of interest.”

The Ethics Commission concluded that as a member of the Affordable Housing Agency, you meet the definition of “advisory personnel” set forth in Section 2-11.1(b)(4) of the Dade County Code. As a result, the Commission determined that a conflict of interest would exist in the event that you were to vote as a Board Member on any matters concerning Developers with whom you consult. Please note that you are also subject to the provisions of Section 2-11.1(h), entitled “Prohibition of use of confidential information”, as well as other provisions of the Conflict of Interest and Code of Ethics Ordinance which may be applicable.

I enclose a copy of the Conflict of Interest and Code of Ethics Ordinance for your review.

Very truly yours,



Robert Meyers
Executive Director

Enc.