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July 27, 2007

Michael Salem  
Executive Director  
S.T.E.P.S. in the Right Direction, Inc.  
1651 West 37<sup>th</sup> Street #406  
Hialeah, FL 33002

**RE: REQUEST FOR ADVISORY OPINION RQO 07-27**

Dear Mr. Salem:

The Commission on Ethics and Public Trust considered your request for an advisory opinion at its meeting on July 25, 2007 and rendered its opinion based on the facts stated in your letter.

You requested an opinion regarding whether S.T.E.P.S. in the Right Direction ("Steps) may contract with one of its officers for office space.

In your request, you advised the Commission that STEPS is a non-profit social services agency that provides services to disadvantaged and special needs youth and adults. STEPS provides skill training, job placement, family support services, healthcare, childcare, transportation and other services.

At its inception, STEPS operated out of a local church. During its early existence, STEPS moved on several occasions. In 2004, due to a lack of revenue, the Board accepted an offer from one of its directors to provide office space at a reduced rate. The related party transaction was disclosed in the required audits and annual reports of STEPS.

STEPS receives community-based organization (CBO) funding from the Public Health Trust. The CBO funding provides very limited funding for rent. STEPS will not seek reimbursement

for rent during the remainder of fiscal year 2007. Pursuant to the CBO agreement, STEPS is required to comply with the applicable sections of the Conflict of Interest ordinance.

The Commission found STEPS is permitted to contract with a director for office space as long as the officer does vote on the contract for office space. Section 2-11.1(n) prohibits a covered person from participating in any official action directly or indirectly affecting a business in which he or she or a member of their immediate family has a financial interest. Accordingly, STEPS may contract for the office space as long as the officer/director does not take any official action regarding the lease such as signing the agreement on behalf of STEPS or voting on the terms of the agreement on behalf of STEPS.

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 the opinion, please call the undersigned at (305) 579-2954 or Ardyth Walker, Staff General Counsel at (305) 579-2653.

Sincerely Yours,



ROBERT MEYERS  
Executive Director