



Miami-Dade Commission on Ethics & Public Trust

Report of Inquiry

Investigator: Sylvia Batista

Case: PI15-007	Case Name:	<u>Date Opened:</u>	CASE CLOSED Date: 3/30/2015
Complainant(s): N/A	Subject(s): Public Housing and Community Development.	03/16/15	

Allegation(s):

This matter was initiated as a follow-up to the introduction of the revised Ethics Disclosure Statement form (the "form") for Public Housing and Community Development (PHCD) programs that was put into effect and provided to pertinent PHCD staff on 01/30/15. The revised form was implemented as a way to ensure compliance with Section 2-11.1(c) (5) (5), Miami-Dade County Conflict of Interest and Code of Ethics Ordinance. Inclusion of the form as part of every application for assistance would indicate to PHCD staff whether or not a conflict of interest is present which would determine whether an ethics opinion from the COE is required.

The COE considers that it is advisable to monitor that the form is being, and will continue to be, properly used in all instances by PHCD staff as a necessary step to ensure compliance with the aforementioned code.

Relevant Law:

Section 2-11.1(c) (5) (5), Miami-Dade County Conflict of Interest and Code of Ethics Ordinance.

Investigation:

E-mails and telephone conversations:

03/17/15 – e-mail from the COE to Alisa Caballero, Quality and Assurance Officer, Administrative Services Division, PHCD and Mari Saydal-Hamilton, Assistant Director, PHCD, requesting copies of all Ethics Disclosure Statement forms for all PHCG programs filed as of February 2, 2015 to the present.

03/17/15 - e-mail confirming a telephone conversation with Alisa Caballero wherein Ms. Caballero informed that the Ethics Disclosure Statement forms are collected by various staff members of PHCD who have been assigned to receive and maintain custody of the forms. Ms. Caballero agreed to provide the names of those PHCD employees.

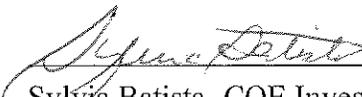
03/17/15 – conversation with Mari Saydal-Hamilton who wanted clarification and an explanation as to the need for the requested information. Ms. Saydal-Hamilton explained that the applications for the programs are kept by each of the various persons assigned to the programs and not maintained in a central depository. She stated that the task of gathering all of the forms is a daunting one and also unnecessary. Ms. Saydal-Hamilton was told by the COE investigator that the COE has seen a reduction in requests for advisory opinions since introducing the form and considers that monitoring might be indicated. Ms. Saydal-Hamilton explained that the form alone does not guarantee total compliance with the Code, and that they cannot control if an applicant is untruthful. Ms. Saydal-Hamilton added that PHCD will detect any irregularity when they perform their annual audit in September of each year.

03/18/15 – e-mail from COE to Ms. Caballero and Ms. Saydal-Hamilton to serve as notice of the correct and consistent use of the form towards ensuring compliance with the Code.



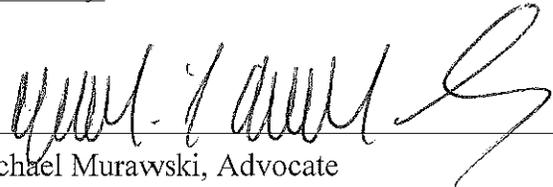
Conclusion(s):

This matter is closed with no further action pending PHCD's annual audit and report in September.

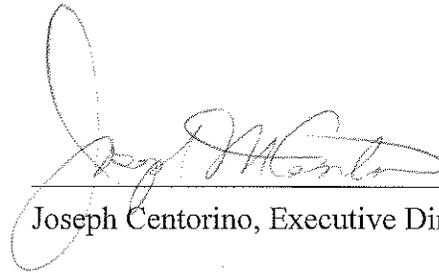


Sylvia Batista, COE Investigator

Approved by:



Michael Murawski, Advocate



Joseph Centorino, Executive Director

Date: 3/30/15