

# Memo

**To:** Wanda Walker  
Assistant Division Director  
Community Action Agency

**From:** Ardyth Walker  
Staff General Counsel

**Date:** 9/25/2007

**Re:** Inquiry 07-1152

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I received your request for an opinion regarding your outside employment and am rendering this staff opinion based on the facts in your request. In your request, you advised me that you and your husband own a catering company. The catering company recently received a contract for St. Albans Head Start. St. Albans is a delegate head start site for CAA. You are an Assistant Division Director in the Self-Help Division and have no oversight responsibilities for the Head Start program.

The Conflict of Interest ordinance permits your husband's company to contract with a company that does business with Miami-Dade County. Section 2-11.1 (d) of the Conflict of Interest ordinance only prohibits the spouses of employees from contracting directly with their spouse's department. Since the contract is with St. Albans and not the Community Action Agency or Miami-Dade County, the contract is not a conflict of interest.

As for the Section 8 matter, the same section applies. You may contract with Miami-Dade County to provide Section 8 housing as long as you are not an employee of the Housing Agency or administer a housing program that refers clients or participants to the Section 8 program. However, at the time that you actually register with the Housing Agency to participate in the Section 8 program, you will need to request a formal opinion from our office.

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Please contact me at 350-0616 if you want a formal opinion from the Ethics Commission or have any further questions.

cc: Julie Edwards, Interim Executive Director, Community Action Agency

**Walker, Ardyth (COE)**

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**From:** Walker, Wanda (CAA)  
**Sent:** Monday, September 17, 2007 9:26 AM  
**To:** Walker, Ardyth (COE)  
**Subject:** Questions in ref to Conflict of Interest

Good Morning Ms. Walker,

I am sending this email, per Mrs. Julie Edwards email to CAA employees on Outside Employment & Possible Conflict of Interest. I have two (2) questions.

1. My husband and I own a Catering Company; he runs the day to day operations of the company. My name is on the corporation as Vice President. We cater to private and charter schools, day cares, weddings, picnics etc. We were awarded the contract for St. Albans Head Start which is a delegate Head Start site. I work for CAA in the Self Help Division, not the Head Start Division. My duties as the Assistant Division Director are an administrative and supervisory. Primary functions is the oversight of the agency's sufficiency programs such as computer training, employment and training, after schools youth development programs. My question is with my husband securing a contract with a delegate Head Start program is this a conflict of interest?
2. I recently purchased (last week) a duplex in which one tenate is on Section 8. I have not gone through the process of contacting HUD to do the paper work of putting my name on record as the new owner. I plan to do that this week. The property is located in Dade County. I want to know a county employee becoming a Section 8 landlord is this a conflict of Interest?

I look forward to your response.

Thank You,

**Wanda R. Walker**, Assistant Division Director  
**Miami Dade County Community Action Agency**  
Self Help Division - Central Office  
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